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# New York Contractor Handbook

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Populus Group

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## Welcome to Populus Group!

We are very excited that you have joined our dynamic team. We are strongly committed to an organization and environment where each of our employees can reach their highest potential. This handbook is designed to acquaint you with the Company and provide you with information about some of the policies affecting your employment. You should read, understand, and comply with all provisions of the handbook.

No employee handbook can anticipate every circumstance or question about policy. The Company reserves the right to revise, supplement, or rescind any policies or portion of the handbook from time to time as it deems appropriate, in its sole and absolute discretion.

If you have any questions about the Company's policies, please feel free to contact any Company representative.

Throughout this Handbook, "The Company" refers to Populus Group, LLC.

The Company intends to comply with all applicable federal, state, and local laws, including but not limited to those relating to medical, family or military leave; equal employment opportunity; environmental regulations and laws; safety; health; and laws regarding any other terms and conditions of employment. Similarly, we expect employees to comply with all laws that apply to their jobs.

This Handbook and each of its provisions is to be interpreted and/or applied in accordance with all applicable federal, state, and local laws. Insofar as there is or may appear to be a conflict between the wording of any provision of this Handbook and applicable law, the law shall take precedence and the provision in question shall be interpreted and applied in a way that conforms to the law.

### Important Note About this Handbook and Employment-At-Will

Populus Group is an at-will employer. Either you or The Company may terminate the employment relationship at any time, for any reason, with or without cause or notice. Nothing in this Handbook shall limit the right for employment to terminate at-will. No supervisor or representative of The Company is authorized to enter into an agreement – expressed or implied – with any employee for employment other than at-will. Only the President of the Company has any authority to enter into any agreement for employment for any specified period. Any such agreement by the President shall be in writing and signed by the President.

This Handbook is not an expressed or implied contract.

## Code of Conduct

In addition to this employee handbook, the company also maintains a code of conduct ("Code"). You should review and comply with our code in addition to this employee handbook. Our code is designed to provide guidance for conducting business according to the highest ethical standards. Based on our shared values, it also provides guidance and instruction on how to

identify and deal with ethical issues if and when they arise period our code also provides clear mechanisms for reporting unethical conduct without fear of retaliation or retribution.

To make an ethics violation report, you may contact any of the following resources:

- A Human Resources representative for the Company
- The Legal department for the Company
- The Company Corporate Ethics and Compliance Officer, by mail or e-mail
  - By mail: 3001 Big Beaver Rd. Troy, MI 48084
  - By e-mail: [hr@populusgroup.com](mailto:hr@populusgroup.com)
- The External Hotline
  - By phone: 844-781-8201
  - Via the internet: <https://secure.ethicspoint.com/domain/media/en/gui/49372/index.html>

## Equal Employment Opportunity

To provide equal employment and advancement opportunities to all individuals, employment decisions at the Company are based on merit, qualifications, and abilities. The Company does not discriminate in employment opportunities or practices on the basis of race, color, religion, sex, gender expression, gender identity, sexual orientation, national origin, age, disability, pregnancy, childbirth or related medical condition, citizenship status, military or veteran status, genetic information, union affiliation or any other characteristic protected by federal, state, or local law ("Protected Characteristics"). This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training. Any employees with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their immediate supervisor or team leader. Employees can raise concerns and make reports without fear of reprisal. Anyone found to be engaging in any type of unlawful discrimination or any supervisor who retaliates against any employee for reporting concerns is subject to disciplinary actions, up to and including immediate termination of employment.

## Employment Selection Policy

It is the Policy of the Company to conduct an employment selection process that includes a variety of procedures to ensure that it evaluates, selects, refers, and employs the most qualified individuals. The Company's Employment Selection Process ("Selection Process") is designed to assess an applicant's/employee's ability: (1) to meet the qualifications of the position; (2) to adhere to the Company's, and as required, the designated Client's legal, ethical and conduct standards; and (3) to perform the job requirements of the position without posing an unacceptable risk of harm to self or others.

The Selection Process primarily includes a review of the applicant/employee's qualifications, prior employment history, reference checks and ability to perform the job. The Selection Process may also include pre-employment ability testing, medical examinations, drug screening and/or Consumer Reports. "Consumer Reports" may include, but are not limited to criminal

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conviction history, credit history, employment, and education verification, driving history and other public records. All requested Consumer Reports are initiated by the Company through an authorized third-party vendor. Only Consumer Reports secured from an authorized third-party vendor will be considered part of the Company's Selection Process for purposes of determining employment eligibility.

## Consumer Report Policy

It is the policy of the Company to initiate an applicant's Consumer Reports after an offer has been made and before the position start date. The Company may also conduct Consumer Reports in connection with promotion, retention, and reassignment decisions for all internal positions. In addition, the Company may conduct post offer, pre-employment applicant, promotion, retention, and reassignment Consumer Reports, consistent with this process at the request of the designated Client for any contract assignment.

Initiation of a Consumer Report requires a completed and signed Authorization for the Procurement of a Consumer Report Form ("Authorization Form"). The Company reserves the right to exclude any applicant from further consideration for employment, or to terminate any employee, who refuses to sign the Authorization Form and/or submit to a Consumer Report. Customers that require an applicant/employee to submit to a Consumer Report must complete and sign a Customer Position Certification Form ("CPC"), and/or other designated forms. The Company reserves the right to deny Client requests to perform a Consumer Report if a CPC, or other required forms, are absent, or if the request is inconsistent with applicable legal regulations.

The Company conducts a targeted screen of all Consumer Report results to determine if an applicant/employee will be disqualified from further consideration for the applicable position. The Company will notify the applicant/employee of a pre adverse disqualification for employment in accordance with the Fair Credit Reporting Act (FCRA) requirements and provide the applicant/employee with an opportunity to submit additional relevant information for consideration concerning the facts and/or circumstances of the conviction(s) and/or conduct. Consumer Reports disputed for inaccuracies in accordance with the FCRA that result in an amended Consumer Report will be reassessed by the Company in accordance with this policy. Any additional relevant information received from an applicant/employee will be reviewed and considered in an individualized assessment conducted by the Company.

The Company utilizes the following criteria when evaluating the results of a Consumer Report:

## Criminal Conviction Results

The Company conducts a targeted screen of all criminal results to determine if an applicant/employee will be disqualified from further consideration for the applicable position. The targeted screen shall consider the nature and gravity of the offense or conduct, the time elapsed since the offense, conduct and/or completion of the sentence and the nature of the job. Any applicant/employee preliminarily disqualified during the targeted screen will be provided with notice and an opportunity to participate in an individualized assessment by completing a Background Individualized Assessment Form ("Assessment Form") as

part of the FCRA pre-adverse action notification process. Applicant/employees who receive a pre-adverse action notification have five (5) business days to complete and return Assessment Form to Company; otherwise, the Company will proceed with making the hiring decision based on the information obtained in the Consumer Report results.

An assessment of Criminal Conviction shall include, among other details, any additional relevant information provided by the applicant/employee concerning the facts or circumstances surrounding the offense or conduct. The assessment may also consider the following factors, including but not limited to: (1) age at the time of conviction or conduct; (2) age when released from criminal conduct penalties, if applicable; (3) relevant work history after the offense or conduct, related to the applicable potential position, such as same or different employer, with any known incidents of criminal conduct; (4) length and consistency of employment history before and after the offense or conduct; (5) rehabilitation efforts related to the offense or conduct; (6) employment or character references and any other information regarding fitness for the applicable position at Client; and (6) whether the individual is bonded under a federal, state or local bonding program. Upon receipt of the Assessment Form, a Background Investigation Analyst will consider and weigh the information provided by the applicant/employee against job related factors and business necessity to reassess his/her eligibility for the applicable position. Where appropriate, the Background Investigation Analyst may also consult with HR and legal representatives when evaluating the additional information.

## Reasonable Accommodations/Modified Job Duties

To assist our employees who are or become disabled, who suffer on-the-job injuries or who are pregnant, we will make reasonable accommodations to enable such employees to continue performing the essential functions of their jobs. Consistent with this policy, we may modify job duties to comply with medical requirements or restrictions. Other accommodations, such as transferring to another position, allowing employees to apply for a vacant position for which the employee is qualified or providing a leave of absence may be appropriate, depending upon specific facts and circumstances of individual situations. Likewise, we will make reasonable accommodations for an individual's sincerely held religious beliefs and practices to the extent required by applicable law.

There are limits to the accommodations we can realistically make. For example, where an accommodation would cause an undue hardship to the Company, we may be unable to make the accommodation. Similarly, if placing an individual in a position, with or without accommodation, would cause the employee to be a direct threat to him or herself or others, we may be unable to place the employee in a particular position.

If you need to request a reasonable accommodation because of a disability, pregnancy, on-the-job injury, or religious beliefs, please notify your Populus Group point of contact. We will discuss the matter with you, investigate your request, and to the extent possible, attempt to reasonably accommodate you.

Any employee who has questions or concerns about reasonable accommodations in the workplace is encouraged to speak to Human Resources. Employees can raise concerns and make reports and/or requests without fear of retaliation or retribution. Anyone who retaliates against any employee for reporting concerns or making accommodation requests may be subject to discipline, up to and including immediate termination.

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## Preventing Harassment

We are committed to creating a positive and productive work environment in which everyone is treated with respect and dignity. This means we must not engage in behavior that could be viewed as harassing or hostile to our coworkers or customers. Such behavior includes disparaging or inappropriate remarks, gestures, or conduct relating to a person's:

- Race, color, or national origin
- Gender
- Genetic origin
- Gender Identity
- Gender Expression
- Sexual orientation
- Religion
- Age
- Disability
- Veteran status
- Other characteristics protected by applicable law

Harassment can be sexual or non-sexual in nature. Sexual harassment includes conduct such as unwanted advances, inappropriate sexual jokes, sexually suggestive comments, inappropriate touching, requests for sexual favors and inappropriate comments about another's appearance. Non-sexual harassment may include intentionally refusing to use an employee's preferred name or pronoun, offensive comments, jokes or pictures related to the topics listed above.

Use of Populus Group, or a client's, network, system, or any electronic device (personal or company- issued) to harass another person is also strictly prohibited.

Individuals who believe they are being harassed or who believe they have witnessed such prohibited conduct should immediately notify their Populus Group point of contact or Human Resources department ([HR@PopulusGroup.com](mailto:HR@PopulusGroup.com)).

For further information about preventing harassment, you may also consult the Human Resources department ([HR@PopulusGroup.com](mailto:HR@PopulusGroup.com)).

## Sexual Harassment

Populus Group is committed to maintaining a workplace free from sexual harassment. Sexual harassment is a form of workplace discrimination. All employees are required to work in a manner that prevents sexual harassment in the workplace. This Policy is one component of the Populus Group's commitment to a discrimination-free work environment. Sexual harassment is against the law<sup>1</sup> and all employees have a legal right to a workplace free from sexual harassment and employees are urged to report sexual

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<sup>1</sup> While this policy specifically addresses sexual harassment, harassment because of and discrimination against persons of all protected classes is prohibited. In New York State, such classes include age, race, creed, color, national origin, sexual orientation, military status, sex, disability, marital status, domestic violence victim status, gender identity and criminal history.



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harassment by filing a complaint internally with the Company. Employees can also file a complaint with a government agency or in court under federal, state, or local antidiscrimination laws.

## Policy:

1. This policy applies to all employees, applicants for employment, interns, whether paid or unpaid, contractors and persons conducting business, regardless of immigration status, with Populus Group.
2. Sexual harassment will not be tolerated. Any employee or individual covered by this policy who engages in sexual harassment or retaliation will be subject to remedial and/or disciplinary action up to and including termination.
3. Retaliation Prohibition: No person covered by this Policy shall be subject to adverse action because the employee reports an incident of sexual harassment, provides information, or otherwise assists in any investigation of a sexual harassment complaint. The Company will not tolerate such retaliation against anyone who, in good faith, reports or provides information about suspected sexual harassment. Any employee of Populus Group who retaliates against anyone involved in a sexual harassment investigation will be subjected to disciplinary action, up to and including termination. All employees, paid or unpaid interns, or non-employees<sup>2</sup> working in the workplace who believe they have been subject to such retaliation should inform a Company supervisor, manager, human resources ([HR@PopulusGroup.com](mailto:HR@PopulusGroup.com) or 630 874 7251), or contact the ethics hotline (844-781-8201 or <https://secure.ethicspoint.com/domain/media/en/gui/49372/index.html>). All employees, paid or unpaid interns or non-employees who believe they have been a target of such retaliation may also seek relief in other available forums, as explained below in the section on Legal Protections.
4. Sexual harassment is offensive, is a violation of our policies, is unlawful, and may subject Populus Group to liability for harm to targets of sexual harassment. Harassers may also be individually subject to liability. Employees of every level who engage in sexual harassment, including managers and supervisors who engage in sexual harassment or who allow such behavior to continue, will be penalized for such misconduct.
5. Populus Group will conduct a prompt and thorough investigation that ensures due process for all parties, whenever management receives a complaint about sexual harassment, or otherwise knows of possible sexual harassment occurring. The Company will keep the investigation confidential to the extent possible. Effective corrective action will be taken whenever sexual harassment is found to have occurred. All employees, including managers and supervisors, are required to cooperate with any internal investigation of sexual harassment.
6. All employees are encouraged to report any harassment or behaviors that violate this policy. The Company will provide all employees a complaint form for employees to report harassment and file complaints.
7. Managers and supervisors are **required** to report any complaint that they receive to human resources, or any harassment that they observe or become aware of, to human resources or contact the ethics hotline.

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<sup>2</sup> A non-employee is someone who is (or is employed by) a contractor, subcontractor, vendor, consultant, or anyone providing services in the workplace. Protected non-employees include persons commonly referred to as independent contractors, "gig" workers and temporary workers. Also included are persons providing equipment repair, cleaning services or any other services provided pursuant to a contract with the employer.

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This policy applies to all employees, paid or unpaid interns, and non-employees and all must follow and uphold this policy.

## What Is “Sexual Harassment”?

Sexual harassment is a form of sex discrimination and is unlawful under federal, state, and (where applicable) local law. Sexual harassment includes harassment based on sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity and the status of being transgender.

Sexual harassment includes unwelcome conduct which is either of a sexual nature, or which is directed at an individual because of that individual’s sex when:

- Such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile or offensive work environment, even if the reporting individual is not the intended target of the sexual harassment.
- Such conduct is made either explicitly or implicitly a term or condition of employment; or
- Submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual’s employment.

A sexually harassing hostile work environment includes, but is not limited to, words, signs, jokes, pranks, intimidation, or physical violence which are of a sexual nature, or which are directed at an individual because of that individual’s sex. Sexual harassment also consists of any unwanted verbal or physical advances, sexually explicit derogatory statements or sexually discriminatory remarks made by someone which are offensive or objectionable to the recipient, which cause the recipient discomfort or humiliation, which interfere with the recipient’s job performance.

Sexual harassment also occurs when a person in authority tries to trade job benefits for sexual favors. This can include hiring, promotion, continued employment or any other terms, conditions, or privileges of employment. This is also called “quid pro quo” harassment.

Any employee who feels harassed should report so that any violation of this policy can be corrected promptly. Any harassing conduct, even a single incident, can be addressed under this policy.

## Examples of sexual harassment

The following describes some of the types of acts that may be unlawful sexual harassment and that are strictly prohibited:

- Physical acts of a sexual nature, such as:
  - Touching, pinching, patting, kissing, hugging, grabbing, brushing against another employee’s body, or poking another employee’s body.
  - Rape, sexual battery, molestation or attempts to commit these assaults.
- Unwanted sexual advances or propositions, such as:

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- Requests for sexual favors accompanied by implied or overt threats concerning the target's job performance evaluation, a promotion or other job benefits or detriments.
  - Subtle or obvious pressure for unwelcome sexual activities.
  - Sexually oriented gestures, noises, remarks or jokes, or comments about a person's sexuality or sexual experience, which create a hostile work environment.
  - Sex stereotyping occurs when conduct or personality traits are considered inappropriate simply because they may not conform to other people's ideas or perceptions about how individuals of a particular sex should act or look.
  - Sexual or discriminatory displays or publications anywhere in the workplace, such as:
    - Displaying pictures, posters, calendars, graffiti, objects, promotional material, reading materials or other materials that are sexually demeaning or pornographic. This includes such sexual displays on workplace computers or cell phones and sharing such displays while in the workplace.
  - Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity and the status of being transgender, such as:
    - Interfering with, destroying, or damaging a person's workstation, tools, or equipment, or otherwise interfering with the individual's ability to perform the job.
    - Sabotaging an individual's work.
    - Bullying, yelling, name-calling.

## Who can be a target of sexual harassment?

Sexual harassment can occur between any individuals, regardless of their sex or gender. New York Law protects employees, paid or unpaid interns, and non-employees, including independent contractors, and those employed by companies contracting to provide services in the workplace. Harassers can be a superior, a subordinate, a coworker or anyone in the workplace including an independent contractor, contract worker, vendor, client, customer, or visitor.

## Where can sexual harassment occur?

Unlawful sexual harassment is not limited to the physical workplace itself. It can occur while employees are traveling for business or at employer sponsored events or parties. Calls, texts, emails, and social media usage by employees can constitute unlawful workplace harassment, even if they occur away from the workplace premises, on personal devices or during non-work hours.

## Retaliation

Unlawful retaliation can be any action that could discourage a worker from coming forward to make or support a sexual harassment claim. Adverse action need not be job-related or occur in the workplace to constitute unlawful retaliation (e.g., threats of physical violence outside of work hours).

Such retaliation is unlawful under federal, state, and (where applicable) local law. The New York State Human Rights Law protects any individual who has engaged in “protected activity.” Protected activity occurs when a person has:

- Made a complaint of sexual harassment, either internally or with any anti-discrimination agency.
- Testified or assisted in a proceeding involving sexual harassment under the Human Rights Law or other anti-discrimination law.
- Opposed sexual harassment by making a verbal or informal complaint to management, or by simply informing a supervisor or manager of harassment.
- Reported that another employee has been sexually harassed; or
- Encouraged a fellow employee to report harassment.

Even if the alleged harassment does not turn out to rise to the level of a violation of law, the individual is protected from retaliation if the person had a good faith belief that the practices were unlawful. However, the retaliation provision is not intended to protect persons making intentionally false charges of harassment.

## Reporting Sexual Harassment

**Preventing sexual harassment is everyone’s responsibility.** Populus Group cannot prevent or remedy sexual harassment unless it knows about it. Any employee paid or unpaid intern or non-employee who has been subjected to behavior that may constitute sexual harassment is encouraged to report such behavior to a Company supervisor, manager, human resources, or contact the ethics hotline. Anyone who witnesses or becomes aware of potential instances of sexual harassment should report such behavior to a Company supervisor, manager, human resources, human resources ([HR@PopulusGroup.com](mailto:HR@PopulusGroup.com) or 630 874 7251), or contact the ethics hotline (844-781-8201 or <https://secure.ethicspoint.com/domain/media/en/gui/49372/index.html>).

Reports of sexual harassment may be made verbally or in writing. A form for submission of a written complaint is attached to this Policy, and all employees are encouraged to use this complaint form. Employees who are reporting sexual harassment on behalf of other employees should use the complaint form and note that it is on another employee’s behalf.

Employees, paid or unpaid interns or non-employees who believe they have been a target of sexual harassment may also seek assistance in other available forums, as explained below in the section on Legal Protections.

## Supervisory Responsibilities

All supervisors and managers who receive a complaint or information about suspected sexual harassment, observe what may be sexually harassing behavior or for any reason suspect that sexual harassment is occurring, are required to report such suspected

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sexual harassment to human resources [HR@PopulusGroup.com](mailto:HR@PopulusGroup.com) or 630 874 7251), or contact the ethics hotline (844-781-8201 or <https://secure.ethicspoint.com/domain/media/en/gui/49372/index.html>).

In addition to being subject to discipline if they engaged in sexually harassing conduct themselves, Company supervisors and managers will be subject to discipline for failing to report suspected sexual harassment or otherwise knowingly allowing sexual harassment to continue.

Company supervisors and managers will also be subject to discipline for engaging in any retaliation.

## Complaint and Investigation of Sexual Harassment

**All** complaints or information about sexual harassment will be investigated, whether that information was reported in verbal or written form. Investigations will be conducted in a timely manner and will be confidential to the extent possible.

An investigation of any complaint, information or knowledge of suspected sexual harassment will be prompt and thorough and completed as soon as possible. The investigation will be kept confidential to the extent possible. All persons involved, including complainants, witnesses and alleged harassers will be accorded due process, as outlined below, to protect their rights to a fair and impartial investigation.

Any employee may be required to cooperate as needed in an investigation of suspected sexual harassment. The Company will not tolerate retaliation against employees who file complaints, support another's complaint or participate in an investigation regarding a violation of this policy.

While the process may vary from case to case, investigations should be done in accordance with the following steps:

- Upon receipt of complaint, the Company will conduct an immediate review of the allegations, and take any interim actions (e.g., instructing the respondent to refrain from communications with the complainant), as appropriate. If the complaint is verbal, encourage the individual to complete the "Complaint Form" in writing. If he or she refuses, prepare a Complaint Form based on the verbal reporting.
- If documents, emails, or phone records are relevant to the investigation, take steps to obtain and preserve them.
- Request and review all relevant documents, including all electronic communications.
- Interview all parties involved, including any relevant witnesses.
- Create a written documentation of the investigation (such as a letter, memo, or email), which contains the following:
  - A list of all documents reviewed, along with a detailed summary of relevant documents.
  - A list of names of those interviewed, along with a detailed summary of their statements.
  - A timeline of events.
  - A summary of prior relevant incidents, reported or unreported; and
  - The basis for the decision and final resolution of the complaint, together with any corrective action(s).

- Keep the written documentation and associated documents in a secure and confidential location.
- Promptly notify the individual who reported and the individual(s) about whom the complaint was made of the final determination and implement any corrective actions identified in the written document.
- Inform the individual who reported of the right to file a complaint or charge externally as outlined in the next section.

## Legal Protections and External Remedies

Sexual harassment is not only prohibited by the Company but is also prohibited by state, federal, and, where applicable, local law.

Aside from the internal process at the Company, employees may also choose to pursue legal remedies with the following governmental entities. While a private attorney is not required to file a complaint with a governmental agency, you may seek the legal advice of an attorney.

In addition to those outlined below, employees in certain industries may have additional legal protections.

### State Human Rights Law (HRL)

The Human Rights Law (HRL), codified as N.Y. Executive Law, art. 15, § 290 et seq., applies to all employers in New York State regarding sexual harassment, and protects employees, paid or unpaid interns and non-employees, regardless of immigration status. A complaint alleging violation of the Human Rights Law may be filed either with the Division of Human Rights (DHR) or in New York State Supreme Court.

Complaints with DHR may be filed any time **within one year** of the harassment. If an individual did not file at DHR, they can sue directly in state court under the HRL, **within three years** of the alleged sexual harassment. An individual may not file with DHR if they have already filed a HRL complaint in state court.

Complaining internally to the Company does not extend your time to file with DHR or in court. The one year or three years is counted from date of the most recent incident of harassment.

You do not need an attorney to file a complaint with DHR, and there is no cost to file with DHR.

DHR will investigate your complaint and determine whether there is probable cause to believe that sexual harassment has occurred. Probable cause cases are forwarded to a public hearing before an administrative law judge. If sexual harassment is found after a hearing, DHR has the power to award relief, which varies but may include requiring your employer to take action to stop the harassment, or redress the damage caused, including paying of monetary damages, attorney's fees, and civil fines.

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DHR's main office contact information is: NYS Division of Human Rights, One Fordham Plaza, Fourth Floor, Bronx, New York 10458. You may call (718) 741-8400 or visit: [www.dhr.ny.gov](http://www.dhr.ny.gov).

Contact DHR at (888) 392-3644 or visit [dhr.ny.gov/complaint](http://dhr.ny.gov/complaint) for more information about filing a complaint. The website has a complaint form that can be downloaded, filled out, notarized, and mailed to DHR. The website also contains contact information for DHR's regional offices across New York State.

## Civil Rights Act of 1964

The United States Equal Employment Opportunity Commission (EEOC) enforces federal anti-discrimination laws, including Title VII of the 1964 federal Civil Rights Act (codified as 42 U.S.C. § 2000e et seq.). An individual can file a complaint with the EEOC anytime within 300 days from the harassment. There is no cost to file a complaint with the EEOC. The EEOC will investigate the complaint and determine whether there is reasonable cause to believe that discrimination has occurred, at which point the EEOC will issue a Right to Sue letter permitting the individual to file a complaint in federal court.

The EEOC does not hold hearings or award relief but may take other action including pursuing cases in federal court on behalf of complaining parties. Federal courts may award remedies if discrimination is found to have occurred. In general, private employers must have at least 15 employees to come within the jurisdiction of the EEOC.

An employee alleging discrimination at work can file a "Charge of Discrimination." The EEOC has district, area, and field offices where complaints can be filed. Contact the EEOC by calling 1-800-669-4000 (TTY: 1-800-669-6820), visiting their website at [www.eeoc.gov](http://www.eeoc.gov) or via email at [info@eeoc.gov](mailto:info@eeoc.gov).

If an individual filed an administrative complaint with DHR, DHR will file the complaint with the EEOC to preserve the right to proceed in federal court.

## Local Protections

Many localities enforce laws protecting individuals from sexual harassment and discrimination. An individual should contact the county, city, or town in which they live to find out if such a law exists. For example, employees who work in New York City may file complaints of sexual harassment with the New York City Commission on Human Rights. Contact their main office at Law Enforcement Bureau of the NYC Commission on Human Rights, 40 Rector Street, 10th Floor, New York, New York; call 311 or (212) 306-7450; or visit [www.nyc.gov/html/cchr/html/home/home.shtml](http://www.nyc.gov/html/cchr/html/home/home.shtml).

## Contact the Local Police Department

If the harassment involves unwanted physical touching, coerced physical confinement or coerced sex acts, the conduct may constitute a crime. Contact the local police department.

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## Harassment Prevention Training Requirement

Populus Group Employees in California, Connecticut, Delaware, Illinois, Maine, and New York are required to complete the harassment prevention training based on the state guidelines. The training will be provided during the first week of the employment via training portal: Litmos.com and expected to be completed during working hours.

## Pay Transparency

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

## Employee Conduct and Work Rules

Populus Group believes in conducting business in accordance with uncompromising ethical standards. Employees are required to always conduct themselves in a professional and productive manner. Although it is not possible to list every form of inappropriate workplace behavior, the following are examples of inappropriate conduct that may result in discipline, up to and including immediate termination:

- Theft or unauthorized removal or possession of Company property.
- Falsifying Company or client records whether paper or electronic.
- Possessing, distributing, selling, transferring, or using illegal drugs or alcohol or working under the influence of illegal drugs or alcohol in the workplace, while on duty, or while operating vehicles or equipment in the performance of their work duties.
- Distributing, selling, or transferring prescription drugs.
- Fighting or threatening violence in the workplace.
- Damaging employer-owned or customer-owned property through negligence or improper use.
- Behaving in an insubordinate or other disrespectful manner.
- Behaving in a rude or unprofessional manner.
- Using profane or vulgar language.
- Sleeping on the job.
- Violating safety or health rules.
- Smoking or use of tobacco in prohibited areas.
- Engaging in sexual or other unlawful harassment or discrimination.
- Starting or perpetuating rumors, false statements, or gossip.
- Possessing dangerous or unauthorized materials in the workplace, such as explosives or firearms.



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- Violating attendance expectations
  - Using telephones, mail system, or other employer-owned equipment without authorization.
  - Excessive personal phone use, including cell phone use, during work hours.
  - Disclosing business secrets or confidential information.
  - Violating personnel policies.
  - Unsatisfactory performance.
  - Inappropriate computer use; or
  - Verbalizing, publishing, electronically posting or distributing false or malicious statements concerning THE COMPANY, clients, managers, or any employee.

This list is not all-inclusive and there may be other circumstances for which employees may be disciplined or terminated at the discretion of the Company considering the nature and severity of the behavior. If you have any questions about these rules, or what we expect of our employees, please discuss them with Human Resources.

Nothing in this handbook or this policy is intended to unlawfully restrict your right to engage in any of the rights guaranteed by Section 7 of the National Labor Relations Act, including, but not limited to, the right to engage in concerted activity for the purposes of mutual aid and/or protection, or any similar state law provision. Nothing in this handbook or policy will be interpreted, applied, or enforced to interfere with, restrain or coerce employees in the exercise of Section 7 rights or any other legal rights.

## Workplace Identity Theft Policy

Identity theft often begins with a crucial piece of personal data and results in thousands of dollars of loss and hours in fixing the problems. Populus Group has a policy that protects the personal information of everyone our company touches: from contractors to internal employees.

If you work with personal information such as social security numbers, salaries, and address information, you have a responsibility to protect this information. For guidelines on how to handle and safeguard personal information, refer to the policies in THE COMPANY's Information Security Program.

Failure to comply with these policies will result in penalties up to and including the termination of your employment, depending on the severity of the incident.

## Smoking/Tobacco

Populus Group maintains a smoke- and tobacco-free office. No smoking or other use of tobacco products (including, but not limited to, cigarettes, pipes, cigars, snuff, or chewing tobacco) is permitted in any part of the building. Employees may smoke outside in designated areas during breaks, when complying with building regulations as well as local ordinances and laws.

# Substance Abuse

## Policy Statement

It is the Company's desire to provide a drug and alcohol-free, healthy, and safe workplace. To promote this goal, employees are required to report to work, and while at work, remain at all times in a condition to perform their jobs in a satisfactory manner. This policy covers all Company employees - full-time, part-time, and temporary employees, and interns.

While on Company premises and while conducting business-related activities off Company premises, no employees may use, possess, distribute, sell, or have a system presence of illegal drugs. The legal use of prescribed drugs is permitted on the job only if it does not impair a Populus employee's ability to perform the essential functions of the job effectively and safely. The Company will follow the federal guidelines in determining the definition of illegal drugs.

## Stipulations

Violations of this policy may lead to disciplinary action, up to and including immediate termination of employment. Such violations may also have legal consequences.

## Rehabilitation

The Company encourages any employee with a drug or alcohol abuse problem to seek treatment voluntarily.

No employee is subject to disciplinary action solely for acknowledging a drug or alcohol problem and seeking treatment for the problem. However, in order to take advantage of that protection, you must come forward and seek treatment before you have received a positive drug or alcohol test result or otherwise violated this policy.

Under the rehabilitation program and agreement, employees who participate are, among other things, required to successfully complete an alcohol or drug treatment program recommended by their substance abuse professional before returning to work. Employees must agree to keep The Company apprised of their compliance with the program recommended by the substance abuse professional.

In the case of a positive test result or the violation of any other aspect of this policy, The Company reserves the right to determine whether to allow the employee an opportunity to enter a rehabilitation program or an individual rehabilitation agreement as an alternative to termination.

Employees with drug or alcohol problems that have not resulted in, and are not the immediate subject of disciplinary action, may request approval to take unpaid time off to participate in a rehabilitation and treatment program. The Company's health

insurance coverage may pay for portions of that treatment. Leave may be granted if the employee agrees to the following conditions:

- Abstain from use of the problem substance; and
- Abide by all Company policies, rules, and prohibitions relating to conduct in the workplace; and
- If granting the leave does not cause The Company any undue hardship.

Employees' acknowledgment of a drug or alcohol problem, and their participation in drug or alcohol rehabilitation does not relieve the employee of the responsibility of behaving properly at work and properly performing their jobs; nor does it excuse employees from complying with this policy. The Company may take disciplinary action, up to and including termination, whenever an employee's performance or behavior is deemed by The Company to be unacceptable, or if the employee violates this policy.

## Drug Testing

The Company requires that all employees be free of alcohol and illegal drugs while working in the workplace. The Company reserves the right to require drug and alcohol tests in the following situations: Pre-employment; Reasonable cause or suspicion; Following an on the job incident which results in serious personal injury or property damage.

An employee's failure to immediately comply with a request to submit to a substance test results in immediate termination.

All drug and alcohol tests are performed by a certified laboratory in accordance with the guidelines for Federal Workplace Testing. All positive results are verified with a second clinical test on the same sample.

Employees with questions about this policy or issues related to drug or alcohol use in the workplace should raise their concerns, without fear of reprisal, with their supervisor or any member of the leadership Team.

## Travel & Expense Policy

### Overview

This policy applies to all Populus Group Contract Employees performing work for Populus Group's respective Clients. This policy outlines the framework and limitations for reasonable and authorized expense reimbursement. If a circumstance arises that is not specifically covered in this travel policy, then the most conservative course of action should be taken.

It is the policy of Populus Group to reimburse Contract Employee's for Client approved expenses deemed reasonable and necessary for Client business. The nature of the business connection and reasonableness will rely largely on the designated Client personnel approval. In good practice, Contract Employees should obtain advance Client and Populus Group approval to ensure reimbursement eligibility.

Contract Employees incurring business related travel expenses should incur the lowest reasonable travel rates, unless outlined otherwise in Client travel policies. It is the Contract Employee's responsibility to obtain advance approval for business related travel costs. Business related travel arrangements will not be reimbursed until after the trip occurs and submitted expense reports are approved by the designated Client personnel.

## Procedure

- It is the Contract Employee's responsibility to ensure the complete, Client approved expense report is routed to Populus Group for review and payment processing. Populus Group has the right to withhold or delay expense reimbursement to validate any expense discrepancies with Client or Contract Employee. **Expenses submitted after 90 days from the date of transaction will not be processed for reimbursement.**
- A complete expense report includes expense type (i.e., meal, mileage, airfare, etc.), amount, business reason, and legible proof of purchase, (i.e., original or scanned itemized receipt). **Expense reports submitted without proof of purchase will not be eligible for reimbursement**, with the exception of travel mileage or toll fees. International expense reports must also include exchange rate documentation at the time of purchase.
- Mileage will be reimbursed per mile at the yearly established IRS federal rate unless the Client has established an alternate reimbursement rate.
- It is Populus Group's policy to deem an extreme purchase or cost ineligible for reimbursement without receiving advanced designated Client personnel approval.

## Reimbursable Expenses – *not inclusive*

- Hotel
- Airfare
- Baggage
- Transportation: Taxi, Train, Bus, Car Service, etc.
- Mileage
- Toll Fees
- Parking
- Meals

## Prohibited Expenses – *not inclusive*

- Credit, debit, and charge card fees (including interest, annual costs)
- Personal dues to clubs for airlines
- Tourist attractions
- Alcoholic beverages
- Toiletries and personal use items
- Personal entertainment
- Health/fitness memberships

- 
- Parking tickets and traffic fines
  - Childcare or Pet care

## Data Expense Reimbursement

Under certain state laws, employers are required to provide employees with a reasonable reimbursement for business expenses incurred on behalf of an employer. Populus Group will pay W2 contractors who are working remote due to mandatory requirements of a client or Populus Group and working in a designated state/city 0.10 cents per hours, up to 40 hours or a maximum of \$4 per week. This payment is intended to reimburse the contractor for reasonable and necessary work-related expenses because of working remotely, such as cell phone use, internet, or other work-related expenses. A contractor who is an active Populus Group employee but does not report hours for the week ending date will not be reimbursed for this expense. If a contractor is currently receiving a reimbursement for a cellphone or other business-related expense as a result of working remotely, they would not be eligible to additionally receive the Data Expense Reimbursement. Contractors will be required to submit the data expense for reimbursement weekly when entering in their timecard. Please reach out to your Populus Group main point of contact on how to enter this expense, as this can differ based on your client guidelines.

Populus Group Contractors in the following states and cities would be eligible for the Data Expense Reimbursement:

- California
- Illinois
- Montana
- New Hampshire
- North Dakota
- South Dakota
- Seattle, Washington

## Populus Group Referral Program

Populus Group is happy to provide current employees with a referral bonus in the amount of \$150 for a successful referral to an open position with Populus Group.

The new employee must complete 120 consecutive days of work before the bonus will be released. This bonus will be paid out as a one-time bonus. If the 120 consecutive days is not completed, no bonus will be issued.

You may obtain a referral form to be submitted with the prospective candidates resume. This can be submitted to the hiring manager at Populus Group who is recruiting for the open position. A copy of the form will be kept in on file. You will not be able to receive a referral bonus for an employee that you yourself will be directly managing at the onset of their employment.

## Accident Reporting

### Policy

It is the Company's policy to provide medical care to employees experiencing an unintentional on-the-job injury or illness. Contract employees and consultants must notify a Company representative and supervisor immediately following an unintentional on-the-job injury or illness. Once reported, a medical facility is authorized to provide adequate medical care. To assist in the rehabilitation process following an on-the-job injury, the Company offers modified-duty assignments to contract employees and consultants based on prescribed medical limitations.

## Procedures for Accident Reporting

The following steps must be followed by a contract employee or consultant who suffers an unintentional on-the-job injury or illness:

1. Notify the client supervisor and a Company representative immediately.
2. In emergency situations, proceed to the nearest emergency medical facility and obtain temporary medical care.
3. Complete a Company Employee Unintentional Injury report. Provide a detailed explanation of the event. Include information such as the time, date, location, cause, and effect of the event.

A Company representative must provide a listing of physicians, industrial clinics, and medical facilities in the area. Update the Company representative about the status of your health and ability to return to work.

## Worker Compensation Fraud

All unintentional on-the-job injuries or illnesses claimed by Company contract employees and consultants are thoroughly investigated. Fraudulent claims are not tolerated and are pursued to the fullest extent.

## Foreign National Family Insurance Enrollment

Due to the fact that some foreign national consultants are unable to enter the United States accompanied by their immediate family at the time of hire; our company policy states that a foreign national is eligible to add an immediate family member to their current insurance policy at the point when that immediate family member enters the United States. A proof of entry will be required at that time and the consultant will need to complete the enrollment process within 30 days from the date of entry to add the family member. If not completed within the 30 days, they will be eligible during the next open enrollment period.

Note: In order to be eligible, you must be a full-time employee, working a minimum of 32 hours per week.

## Separating from The Company

### Voluntary Termination of Employment

A termination is considered voluntary when the employee:

- Gives notice of his or her intention to resign from The Company
- Is absent from work for two consecutive days without notifying The Company
- Fails to return to work at the end of an approved leave of absence

An employee who resigns from a position must:

- Provide written notification of resignation to The Company; and
- Submit the written notification to his or her Populus Group point of contact at least two weeks prior to the anticipated last day employment.

Employees who choose to resign under favorable terms and conditions will be considered eligible to reapply with The Company for any future opportunities.

### Return of Property

When an employee leaves the Company, all Company property must be returned no later than the last day of employment. Company property includes, but is not limited to: the original and any copies of any electronic or hardcopy Confidential Information, Trade Secret information, Company-issued keys, pass cards, tools, samples, fax machines, cell phones, PDAs, computers (laptop and/or desk top), credit cards, rolodexes, files, brochures, equipment, documents, lists, reports, printouts, drawings, plans, sketches, computer disks, zip drives, printouts and any other record or document relating to the Company or its business, products or services, or any information required to be returned in accordance with any applicable employment agreement. You are required to abide by any obligations set forth in an applicable employment agreement when separating from the Company.

## Notice

Employee benefits are affected by employment termination. The employee may choose to continue some benefits at their own expense. The employee is notified in writing of the benefits that may be continued and of the terms, conditions, and limitations of such continuance.

Unless otherwise required by local or state law or regulations, the terminated employee's final paycheck is generally available at the next regularly scheduled pay period.

The Company expects its employees to give at least two weeks' notice before resigning. The Company reserves the right to end employment prior to the final date of employment provided in an employee's resignation. Employees who have signed non-compete agreements are required to reaffirm their obligation under an understanding of the agreement to be eligible for notice pay.

Employees who are discharged (involuntarily terminated) are not eligible for notice pay.

Employees who are absent from work for two or more consecutive days without contacting their supervisor, are considered to have abandoned their job and to have resigned without notice.

Any paid time off that is detailed in an employee's employment agreement will not be paid out at time of termination unless state law states otherwise.

## Employee Leave

We encourage each of our employees to accept their civic responsibilities. As a good corporate citizen, the Company is pleased to assist you in the performance of your civic duties.

### Jury Duty

If you receive a call to jury duty, please notify your supervisor immediately so we can plan the work with as little disruption as possible. While you are on jury duty, the Company will comply with applicable law including with regard to payment of wages while an employee is on jury duty where applicable.

Employees on jury duty must provide their supervisor with a copy of the subpoena. Employees who are released from jury service before the end of their regularly scheduled shift or who are not asked to serve on a jury panel are expected to call their supervisor as soon as possible and report to work if requested and if allowed by law.



## Witness Duty

If you are subpoenaed to appear as a witness, please notify your supervisor immediately so we can plan the work with as little disruption as possible. We do not pay employees who are subpoenaed to appear as witnesses unless the employee's appearance is requested by or on behalf of the Company or required by applicable law.

Employees with witness duty must provide their supervisor with a copy of the subpoena. Employees who are released from witness service before the end of their regularly scheduled shift are expected to call their supervisor as soon as possible and report to work if requested.

## Voting

Although polls are open most of the day, we realize that in some instances our employees are required to work long hours or overtime and may have insufficient time to get to the polls. If you have a problem in this regard, please let your supervisor know so that we can make arrangements for you to have the necessary time to get to the polls. You may be entitled to up to two (2) hours of paid time off to vote.

## Sick Leave

For any qualified employee requesting 3 or more consecutive days of sick leave, the Company reserves the right to require a note from a medical provider verifying that the absence was caused by a medical situation.

For additional information, or to confirm if you qualify for paid sick leave, contact your Populus Group representative.

## Bereavement Time

An employee is eligible to receive up to 8 hours paid leave for a death in the employee's immediate family (spouse, child, grandchild, parent, parents-in-law, siblings, grandparents) or those who took the place of parents.

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## Family and Medical Leave (including Military-Related FMLA Leave)

The Family and Medical Leave Act ("FMLA") provide eligible employees the opportunity to take unpaid, job-protected leave for certain specified reasons.

### Employee Eligibility

- Have worked at least 12 months for the Company in the last seven years; and
- Have worked at least 1,250 hours for the Company over the preceding 12 months

All periods of absence from work due to Military-related FMLA Leave (see section below) are counted in determining FMLA eligibility.

### Conditions Triggering Leave

- Family Medical Leave may be taken for the following reasons:
- Family obligations relating directly to childbirth (FMLA only), adoption or placement of a foster child (up to 12 weeks).
- Care for a child, spouse, or parent with a serious health condition (up to 12 weeks).
- An employee's serious health condition that makes the employee unable to perform the employee's job (up to 12 weeks).
- Care for a member of the Armed Forces (including National Guard) who is a spouse, parent, child and certain other next of kin relatives (up to 26 weeks) (see Military Caregiver Leave under Military-Related FMLA Leave); or,
- Handle certain qualifying exigencies related to activities such as short notice deployment, military events, arranging alternative childcare, making financial and legal arrangements related to the deployment, rest and recuperation, counseling, parental care, and post- deployment debriefings (up to 12 weeks) (see Qualifying Exigency Leave under Military- Related FMLA Leave).

The maximum amount of leave that may be taken in a 12-month period for all reasons combined is 12 weeks, with one exception. For Military Caregiver leave, the maximum combined leave entitlement is 26 weeks, with leaves for all other reasons constituting no more than 12 of those 26 weeks.

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## Definition of Serious Health Condition

"Serious Health Condition" is an illness, injury, impairment or physical or mental condition that involves either an overnight stay in a medical care facility, continuing treatment by a health care provider for a condition that either prevents the employee from performing the functions of the employee's job or prevents the qualified family member from participating in school or other daily activities, including treatment for substance abuse.

## Identifying the 12-Month Period

The Company measures the 12-month period in which leave is taken by the "rolling" 12-month method, measured backward from the date of any Family Medical Leave with one exception. For Military Caregiver, the Company calculates the 12-month period beginning on the first day the eligible employee takes FMLA leave to care for a covered service member and ends 12 months after that date. Family Medical Leave taken for bonding with newborn, adopted or foster care child must be concluded within 12 months of the birth or placement.

## Using Leave

Eligible employees may take Family Medical Leave in a single block of time, intermittently (in separate blocks of time) or by reducing the normal work schedule for:

- The Serious Health Condition of the employee or immediate family member, or in the case of a covered service member, their own injury or illness.
- Qualifying Exigency Leave; or
- Bonding with a newborn or newly placed child. Intermittent leave taken for bonding must be taken in minimum increments of one week or more (up to two exceptions will be granted) and must be completed within a year of the birth or placement of the child.

Employees who require intermittent or reduced-schedule leave must try to schedule their leave so that it will not unduly disrupt the Company's operations.

## Use of Accrued Paid Leave

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Family and Medical Leave is unpaid. Employees participating in a paid sick leave plan must use accrued unused paid sick leave concurrently with Family Medical Leave except during times that workers' compensation or other disability benefits are available to the employee. This includes use of available paid sick leave during any elimination period for receipt of benefits.

## Maintenance of Health Benefits

If you and/or your family participate in our group health plan, the Company will maintain coverage during your Family Medical Leave on the same terms as if you had continued to work. If applicable, you must make arrangements to pay your share of health plan premiums while on leave. In some instances, the Company may recover premiums it paid to maintain health coverage or other benefits for you and your family. Use of Family Medical Leave will not result in the loss of any employment benefit that accrued prior to the start of your leave.

## Notice and Medical Certification

When seeking Family Medical Leave, you are required to provide:

1. Sufficient information for us to determine if the requested leave may qualify for FMLA protection and the anticipated timing and duration of the leave. You must also inform the Company if the requested leave is for a reason for which FMLA leave was previously taken or certified.

Notice must be provided:

- If the need for leave is foreseeable: 30 days in advance of the anticipated beginning date of the leave.
  - If the need for leave is not foreseeable: as soon as is practicable and in compliance with the Company's normal procedures.
2. Medical certification supporting the need for leave due to a serious health condition affecting you or an immediate family member within 15 calendar days of the Company's request to provide the certification. Second or third medical opinions for an employee's own serious health condition may also be required.
  3. Periodic reports as deemed appropriate during the leave regarding your status and intent to return to work; and
  4. Medical certification of fitness for duty before returning to work if the leave was due to your serious health condition. The Company will require this certification to address whether you can perform the essential functions of your position.

Failure to comply with the foregoing requirements may result in delay or denial of leave.

## Employer Responsibilities

To the extent required by law, the Company will inform employees whether they are eligible under the FMLA. Should an employee be eligible for Family Medical Leave, the Company will provide the employee with a notice that specifies any additional information required as well as the employee's rights and responsibilities. If employees are not eligible, the Company will provide a reason for the ineligibility. The Company will also inform employees if leave will be designated as FMLA-protected and, to the extent possible, note the amount of leave counted against the employee's leave entitlements. If the Company determines that the leave is not protected, the Company will notify the employee.

## Job Restoration

Upon returning from Family Medical Leave, eligible employees will typically be restored to their original job or to an equivalent job with equivalent pay, benefits and other employment terms and conditions to the extent available with the current or other client.

## Failure to Return After Family Medical Leave

Any subsequent request for Family Medical Leave beyond the original approved leave must be accompanied by a new Medical Certification Form and submitted to the Benefits department for review and approval. Any employee who fails to return to work as scheduled after FMLA leave or exceeds the 12-week entitlement (or in the case of military caregiver leave, the 26-week FMLA entitlement), will be subject to the Company's standard leave of absence and attendance policies. This may result in termination if you have no other Company-provided leave available to you that applies to your continued absence, and you failed to obtain requisite approval from the Benefits department. Likewise, following the conclusion of your FMLA leave, the Company's obligation to maintain your group health plan benefits ends (subject to any applicable COBRA rights).

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

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

While the Company encourages employees to bring any concerns or complaints about compliance with the FMLA to the attention of your local HR representative or Customer Support Associate, you may also file a complaint with the U.S. Department of Labor or bring a private lawsuit against an employer.

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## Military Related FMLA Leave

There are two forms of Military-Related leave: Military Caregiver Leave and Qualifying Exigency Leave.

### Military Caregiver Leave

Unpaid Military Caregiver Leave is designed to allow eligible employees to care for certain family members who have sustained serious injuries or illnesses in the line of duty while on active duty. Military Caregiver Leave is a special leave entitlement that permits eligible employees to take up to 26 weeks of leave to care for a covered service member during a single 12-month period. Any FMLA taken for any reason from the time of the incident going forward counts against the 26 weeks of leave but not anything used before that time. An employee seeking Military Caregiver

Leave may be required to provide appropriate certification from the employee and/or covered service member and it should be completed by an authorized health care provider within 15 days.

### Qualifying Exigency Leave

Eligible employees may take unpaid "Qualifying Exigency Leave" to tend to certain "exigencies" arising out of the covered active duty or call to covered active-duty status of a "military member."

Qualifying Exigency Leave is available under the following circumstances:

- **Short-notice deployment.** To address any issue that arises out of short notice (within seven days or less) of an impending call or order to covered active duty.
- **Military events and related activities.** To attend any official military ceremony, program, or event related to covered active duty or call to covered active-duty status or to attend certain family support or assistance programs and informational briefings.
- **Childcare and school activities.** To arrange for alternative childcare; to provide childcare on an urgent, immediate need basis; to enroll in or transfer to a new school or daycare facility; or to attend meetings with staff at a school or daycare facility.
- **Financial and legal arrangements.** To make or update various financial or legal arrangements; or to act as the covered military member's representative before a federal, state, or local agency in connection with service benefits.
- **Counseling.** To attend counseling (by someone other than a health care provider) for the employee, for the military member, or for a child or dependent, when necessary, as a result of duty under a call or order to covered active duty.

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- **Temporary rest and recuperation.** To spend time with a military member who is on short-term, temporary rest and recuperation leave during the period of deployment. Eligible employees may take up to 15 calendar days of leave for each instance of rest and recuperation.
  - **Post-deployment activities.** To attend arrival ceremonies, reintegration briefings and events, and any other official ceremony or program sponsored by the military for a period of up to 90 days following termination of the military member's active-duty status. This also encompasses leave to address issues that arise from the death of a military member while on active-duty status.
  - **Parental care.** To care for the military member's parent who is incapable of self-care.
  - **Mutually agreed leave.** Other events that arise from the military member's duty under a call or order to active duty, provided that the Company and the employee agree that such leave shall qualify as an exigency and agree to both the timing and duration of such leave.

An employee seeking Qualifying Exigency Leave may be required to submit appropriate supporting documentation in the form of a copy of the military member's active duty or rest and recuperation orders or other military documentation indicating the appropriate military status and the dates of active-duty status, along with a statement setting forth the nature and details of the specific exigency, the amount of leave needed and the employee's relationship to the military member, within 15 days.

## Uniformed Services Employment and Reemployment Rights Act

The Uniformed Services Employment and Reemployment Rights Act (USERRA) protects service members' reemployment rights when returning from a period of service in the uniformed services, including those called up from the Reserves or National Guard, and prohibits employer discrimination based on military service or obligation. The Company complies fully with USERRA and similar state laws.

### Benefits

An employee on military leave is eligible to continue their health benefits for up to 24 months. The individual will be responsible for all payments for dependent coverage during this time. The employee can arrange payment either in one lump sum or pay it monthly. During the first 12 months of such benefit continuation, the cost will be the same as if the individual was still actively employed. If the leave of absence extends beyond 12 months, the cost will change to the COBRA rate for the remaining 12 months. Please contact the Benefits department to coordinate any changes in an employee's status.

### Reinstatement

The Company reinstates employees returning from military leave as required by USERRA. When you are released from service, please contact the Benefits department and your local HR representative or Customer Support Associate as soon as possible to discuss reinstatement.

## Request for Military Leave

Contract Employees called to military leave shall notify your Recruiter, Customer Support Associate, or Human Resources and provide a copy of their military orders or training notice (if available) to initiate the request for leave. Any questions regarding the status and/or approval of military leave should thereafter be directed to your Customer Support Associate, Human Resources, or the Benefits department.

## Anti-Human-Trafficking Policy

Populus Group and the United States Government prohibit trafficking in persons. Populus Group is committed to a work environment that is free from human trafficking and slavery, which for purposes of this policy includes forced labor and unlawful child labor. Populus Group will not tolerate or condone human trafficking or slavery in any part of our global organization.

Populus Group employees, subsidiaries, contractors, subcontractors, vendors, suppliers, partners and others through whom Populus Group conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery.

### Procedures

Report any conduct that you believe to be a violation of this policy to Populus Group's human resources department. Reports may also be made through the EthicsPoint Hotline at 844-781-8201 or via the internet at the following website: EthicsPoint, which allows anonymous reporting as permitted by applicable law.

Populus Group will not tolerate retaliation against an employee for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report.

## Other Important Policies and Procedures



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## Lactation Break

Any Contract Employee that will require lactation breaks should provide advance notice to the Company, which allows the Company to work with its customer and the Contract Employee to ensure a reasonable amount of break time in a private room that is not a bathroom. The Company will respond within five business days to an employee's request for a room or location to express milk. Employees can take breaks at least once every three hours to pump and can also take breaks right before or after scheduled paid rest periods or meal breaks. Employees may take breaks "each time such employee has reasonable need to express breast milk" for up to three years following childbirth. If a non-exempt hourly employee does not have enough break time to cover the time needed to express milk, any additional time for a lactation break will be unpaid.

Retaliation against Contract Employees that request to express milk at work or a lactation accommodation is expressly prohibited. Contract Employees may report violations of their right to express milk or to request a lactation accommodation to their HR representative.

## Meal and Rest Periods

The Company complies with federal and state legal requirements concerning meal periods and rest breaks.

## Personal Appearance

Employees are expected to project a professional image that positively represents the Company. When working at a customer site, employees must comply with the customer's dress code policy.

# Safety

## Reporting of Accidents and Hazards

It is the Company's policy to provide medical care to employees experiencing an unintentional on-the-job injury or illness. Contract Employees must notify their Customer Support Associate or Recruiter and the customer supervisor immediately following an unintentional on-the-job injury or illness. Once reported, a medical facility is authorized to provide adequate medical care. To assist in the rehabilitation process following an on-the-job injury, the Company offers modified duty assignments to Contract Employees based on prescribed medical limitations.

## Procedures for Accident Reporting

The following steps must be followed by a Contract Employee who suffers an unintentional on-the-job injury or illness:

1. Notify the client supervisor and a Company representative immediately.
2. In emergency situations, proceed to the nearest emergency medical facility and obtain temporary medical care.
3. Complete all required documents related to the event that can be obtained through your Customer Support Associate. Provide a detailed explanation of the event, including information such as the time, date, location, cause and effect of the event.

A Customer Support Associate must provide a listing of physicians, industrial clinics, and medical facilities in the area. Update your Recruiter or Customer Support Associate about the status of your health and ability to return to work.

## Workers' Compensation Fraud

All unintentional on-the-job injuries or illnesses claimed by Company Contract Employees are thoroughly investigated. Fraudulent claims are not tolerated and are pursued to the fullest extent.

## Violence-Free Environment

The Company will not tolerate violence in the workplace. Violence includes physical altercations, coercion, pushing or shoving, horseplay, intimidation, stalking, and threats of violence. Employees should not joke or make offhand remarks about violence. Any comments about violence will be taken seriously and may result in discipline up to and including immediate termination. Weapons of any kind, including but not limited to concealed weapons, are not allowed on the premises of the Company, the customer's premises, or any place where work is being performed, in accordance with applicable law.

## What to do in Case of Violence

If you observe an incident or threat of violence that you believe is imminent and may cause risk of injury or serious harm to you or others in the workplace, IMMEDIATELY DIAL 9-1-1 and report it to the police. If the incident or threat of violence does not appear to require immediate police intervention, please report it to your Recruiter, Customer Support Associate, the leader of the local office, or Human Resources as soon as possible. All complaints will be investigated, and appropriate action will be taken.

## Short Term Disability-State Offered Benefits

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Some states may provide programs which offer short-term Disability Insurance and/or Paid Family Leave in form of wage replacement benefits to eligible workers who need time off work. If your state offers these benefits, you may be eligible if you are unable to work due to non-work-related illness or injury, pregnancy, or childbirth.

For more information, please contact the Benefits Team at [PGBenefits@PopulusGroup.com](mailto:PGBenefits@PopulusGroup.com).

## Solicitation and Distribution

The Company strives to create a work environment where employees have the time, tools, and support necessary to perform their jobs without distraction. In the interest of maintaining this work environment, The Company strictly regulates the solicitation of employees and the distribution of non-work-related literature to employees. Solicitation of employees for any non-work-related purpose, during working time is prohibited. Posting or distribution of non-work-related materials in any Company working area is also prohibited.

Employees are prohibited from distributing non-work-related material in The Company's working areas. Employees may distribute non-work-related material in non-working areas during non-working time but must obtain prior authorization from his/her manager to distribute non-work-related material during the Employee's working time or the working time of other employees. This does not apply to solicitation for Company related fundraising events that have been approved by The Company Leadership, which can occur during working hours and in working areas.

For purposes of this policy, "working time" means the period of time that an employee spends performing actual job duties and but does not include rest periods, meal breaks, and other specified times when employees are not expected to be working and "working areas" include all locations on The Company's premises where employees conduct work for The Company, but does not include break areas, cafeterias, social gathering areas, or parking lots where employees are not expected to be working. The Company also reserves the right to regulate and remove non-work-related materials on company bulletin boards.

Nothing in this policy is intended to interfere with the rights protected under the National Labor Relations Act, or similar state law, which gives employees the right to engage in, as well as the right to refrain from engaging in protected concerted activity relating to terms and conditions of employment including but not limited to conduct for union organizational purposes.

## Timekeeping Procedures, Overtime and Pay

### Exempt/Non-Exempt Status

All positions in The Company are classified as either exempt (salaried) or non-exempt (hourly) pursuant to the applicable provisions of the Fair Labor Standards Act ("FLSA") and applicable state and local laws. Only positions classified as non-exempt are eligible for overtime compensation. All employees in non-exempt positions in The Company are strictly prohibited from

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conducting any work outside of their normal business hours, which includes not performing work on any Company issued or personal electronic device such as cell phones, smart phones, tablets, computers, PDAs, BlackBerrys, and/or laptops, without the prior approval of their supervisor or manager. Exempt employees may not be subject to certain salary deductions, and The Company will only take those deductions that are permitted under applicable law.

## Timekeeping

Each non-exempt employee is required to record his or her hours of work for The Company. Accurately recording all of your time is required in order to be sure that you are paid for all hours worked. You will be informed on your first day on the job whether you are required to keep your time by a time clock, a time sheet, or some other method. Whatever your method of timekeeping, you are expected to follow the established procedures in keeping an accurate record of your hours worked.

Additionally, when applicable, non-exempt employees must record any other non-working time (except breaks) such as time away from The Company for errands, doctor appointments, etc.

Any changes or corrections to your timecard or time record must be updated and approved by you and your supervisor. Under no circumstances may any employee record another employee's timecard or ask another employee to record his or her timecard. Recording another employee's timecard or asking another non-management employee to record your time may result in discipline, up to and including immediate termination.

## "Off-the-Clock" Time is Not Allowed

Comp time, banked time or "off-the-clock arrangements," in lieu of hours worked is strictly prohibited. All hours worked must be recorded appropriately and paid at the applicable straight time and/or overtime rate during the payroll period worked. If you are asked to hold, bank or under report time, report it immediately to Human Resources.

## Schedule

THE COMPANY pays employees for all time worked in accordance with our payroll schedule and in compliance with federal and applicable state/local law. Your supervisor will set your schedule. Populus Group's workweek runs from Sunday to Saturday.

## Recoupment of Wages and/or Expenses Overpayment

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Overpayments occur from time to time because of an error on the part of the employee, client, or in The Company's processing of your pay or expenses. For example, occasionally a clerical error or an incorrect timecard will result in a payment for more hours than were worked.

Should you receive an overpayment, under these or any other circumstances, The Company will recoup the overpayment to the extent allowed by law, including but not limited to, payroll deductions, repayment plans, or legal action. You must notify The Company immediately if you become aware of an overpayment. Unless otherwise prohibited by applicable law, your acknowledgement of the guidebook is authorization for correction of any overpayment of wages.

## Commissions

Some Company employees earn commissions. The details of any commission pay will be outlined in a commission agreement or commission policy. Please refer to your applicable Company commission agreement or compensation plan for additional details.

## Information Security

The Company is committed to ensuring the safety, security and privacy of personnel and Company data in adherence with data protection and data privacy laws. The goal of the Information Security Management Framework is to ensure all information assets identified with, owned by, or entrusted to the Company are protected in a manner consistent with the value attributed to them by the Company in accordance with business requirements, customer requirements and relevant laws and regulations. The Information Security Management Framework includes the following Company policies:

- **Information Security Policy** - contains important rules covering information security and establishes safeguards and controls to protect the Company's informational assets from loss and from unauthorized access, modification, destruction, or disclosure. This includes rules around storage of data and encryption of data.
- **Information Classification Policy** - provides guidelines for classifying the Company's information by sensitivity level and establishes consistent security requirements for classifying, labeling, handling, and disposing of information in a secure manner
- **Employee Privacy Policy** - outlines how the Company protects personal data, who it is provided to, or accessible by the Company and explains the Company's Global Privacy Principles
- **Acceptable Use Policy** - establishes acceptable use of the Company's electronic resources, including (but not limited to) desktop and laptop computers, personal digital assistants, cell phones, electronic mail ("e-mail"), Internet access, internal network resources ("intranet"), external network resources ("extranet"), file shares, SharePoint sites, telephones, voice mail, fax machines, multifunction devices/printers, software, applications, operating systems, databases and electronic storage media
- **Social Media Policy** - provides guidance for acceptable/unacceptable uses of social media as well as information on the appropriate use of social media for certain roles in the Company such as employees in recruiting roles and employees in the Marketing department

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- **Records Retention Policy** – provides guidance for the proper storage, maintenance, and destruction of Company records

## The policies of the Information Security Management Framework:

- Apply to all Company personnel, including employees, Contract Employees, temporary workers, and any authorized representatives, independent contractors, or agents
- Apply regardless of whether the activities are conducted from the Company's premises
- Are mandatory and will be enforced worldwide
- Establish a minimum standard of acceptable conduct

Any employee who is found to have violated any of the policies of the Information Security Management Framework may be subject to discipline, up to and including immediate termination.

## Unauthorized Recording

To maintain the security of our premises and systems, The Company prohibits unauthorized photography or audio and video recording by an employee. Do not use a cell phone or any other device to make any type of unauthorized photograph or audio or video recording. Authorization for any type of recording requires the advance written approval of Human Resources. Violation of this policy may result in discipline, up to and including immediate termination. Nothing contained herein shall preclude an employee from engaging in conduct that is protected by Section 7 of the National Labor Relations Act.

## Verification of Employment and Personnel Files

Employees may review their personnel file in person, with their manager, at a time and place mutually convenient for both the employee and The Company. Employees must request such a review, in writing, to the Human Resources Department, or as required by applicable state law.

Employees may not remove items from their personnel file. Copies of documents that an employee has signed will be provided upon written request. Copies of additional documents will be provided at the discretion of The Company or as required by applicable state law.

## Employee Handbook Acknowledgment Form

The employee guidebook describes information about Populus Group, and I understand that I should consult my supervisor regarding any questions not answered in the guidebook. I have entered into my employment relationship with Populus Group voluntarily and acknowledged that there is no specified length of employment. Accordingly, either Populus Group or I can terminate the relationship at will, with or without cause, at any time, so long as there is not violation of applicable federal or state law.

Since the information, policy and benefits described in the guidebook are necessarily subject to change, I acknowledge that revision to the guidebook may occur, except to Populus Group's policy of employment-at-will. All such changes will be communicated through official notices, and I understand that revised information may supersede, modify, or eliminate existing policies. Only Populus Group's President, or Vice President of Human Resources has the ability to adopt any revision to the policies in this guidebook.

Furthermore, I acknowledge that this guidebook is neither a contract of employment nor a legal document. I understand that these policies are a guide that no guidebook can anticipate every circumstance or question about policy. I have received the guidebook and I understand that it is my responsibility to read and comply with the policies contained in the guidebook and any revisions made to it.

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

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

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

# Drug & Alcohol Use Policy & Procedure

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## Policy Statement

Populus Group is committed to providing a safe work environment and to promoting and protecting the health, safety and wellbeing of its employees, contractors, customers and clients. This commitment is jeopardized when an employee or contractor engages in the use, possession, sale, conveyance, distribution, or manufacture of illegal drugs, intoxicants, or controlled substances or abuses prescription drugs or alcohol. Substance abuse is a serious health problem and has a detrimental effect on Populus Group, its customers and clients in terms of productivity, absenteeism, accidents, medical costs, theft and worker's compensation costs. Populus Group will vigorously comply with all applicable laws, including the Federal Drug Free Workplace Act of 1988, the Federal Controlled Substances Act and applicable State laws. This policy covers all internal and contract (full-time, part-time and temporary employees) and interns. Therefore, Populus Group has established the following policy:

## Policy

While on Populus Group, client or customer premises and while conducting business-related activities of Populus Group, client or customer, no contract employee may use, possess, distribute, sell, convey, manufacture, or have a bodily system (blood, sweat, hair, urine or saliva) presence of any illegal drugs. The legal use of prescribed drugs is permitted on the job only if it does not impair an employee's ability to perform the essential functions of the job effectively and safely. Populus Group will follow the federal and applicable State guidelines in determining the definition of illegal drugs (including determinations regarding the use of medical marijuana).

Alcohol must not be consumed at a Populus Group client or customer facility. Contract employees may not report to work, or return from lunch or other break periods under the influence of alcohol (defined as when the result of drinking any amount of alcohol impairs mental or physical faculties in such a way as to reduce the ability to act with ordinary care). A person shall be determined to be under the influence if the blood alcohol level is .04% or higher.

## Stipulations

Violations of this policy may lead to disciplinary action, up to and including immediate termination of employment. Such violations may also have other legal consequences.

## Drug and Alcohol Testing

Where permitted by law, Populus Group reserves the right to require drug and alcohol tests of contract employees in the following situations:

- Post-offer;
- Pre-employment;
- Reasonable cause or suspicion;



## Drug & Alcohol Use Policy & Procedure

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- Random;
- Following an on the job accident which results in personal injury or property damage;
- Pursuant to the policies of the client or customer; or
- As a condition of employment for safety sensitive roles.

A contract employee's failure to immediately comply with a request to submit to a reasonable cause or suspicion, post-accident or random substance test may lead to disciplinary action, up to and including immediate termination of employment.

A contract employee's failure to comply within 48 hours with a request to submit to a post-offer, pre-employment substance test may result in the contract employee being temporarily ineligible for placement for 180 days.

All positive drug tests are confirmed in SAMHSA (Substance Abuse and Mental Health Service Administration) certified laboratories. All positive breath-alcohol tests are verified with a second confirmation test.

Any contract employee with a positive drug or alcohol test (regardless of reason for the test) is temporarily ineligible for placement for 180 days from notification of positive specimen regardless of a client testing requirement. After 180 days, the contract employee must resubmit to another drug test before working for Populus Group. The 180 days ineligibility period begins on the date the MRO (Medical Review Officer) validates the result, not the actual date the test was taken. You may contact the Populus Group DER (Designated Employer Representative) by emailing [HR@PopulusGroup.com](mailto:HR@PopulusGroup.com) to verify the 180 day ineligibility date expiration for any contract employee.

### No Contact Timeframes

Upon receiving a presumptive positive result from the laboratory, the MRO will make three call attempts over a period of 72 hours to the contract employee in an effort to determine if there is a valid medical explanation for the positive result. Should no contact be made with the contract employee within the 72 hour timeframe, the result will be reported as positive. The contract employee has up to 60 days after the result has been reported to contact the MRO to discuss and provide an explanation and supporting information for the result. The MRO may change the result if appropriate following the discussion and review of supporting information.

### Privacy/Communication of Results

All initial communications regarding confirmed positive drug and alcohol tests will come from the MRO, directly to the contract employee in process. In the case that a Payroll Representative identifies that the test is in the 'Under Review of MRO' status, the Payroll Representative will provide the MRO's contact information to the contract employee under review, allowing for them to privately follow up on the status of their results. The MRO will discuss any options available for retesting with the contract employee, as applicable.

# Drug & Alcohol Use Policy & Procedure

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## Expiration of Drug Test

Drug tests are valid for 90 days or the life of the assignment, whichever is greater. Client requirements will supersede this when documented.

## Cancelled Tests

In the event that a drug or alcohol test is canceled, the result is considered null, and is neither positive nor negative. A new specimen must be provided within 48 hours of notification to the contract employee of the retest. Certain reasons for cancellation will require that the retest be under direct observation by a same-sex collector. Instruction will be provided by the DER on how to proceed in the event of a cancelled test.

The contract employee will be asked to remain at the clinic and provide a new sample under direct observation by a same-sex observer. Should the contract employee decline the second collection, this will be treated as a refusal.

## Refusals to Test

Failure to appear for the test within the 48 hour timeframe, failure to remain at the testing site until the test process is complete, failure to provide the required specimen, failure to provide sufficient volume of specimen, failure to comply with re-testing following a cancelled test, or providing a specimen that has been adulterated will be treated as a refusal to test and the contract employee will be temporarily ineligible for placement for 180 days from refusal to test.

The testing process starts once the contract employee has registered at the clinic. In the event that the contract employee is unable to provide a sufficient volume of specimen, shy bladder/lung procedures will be followed as directed by the clinic.

## Negative Dilute/Negative Super Dilute/Positive Dilute Tests

If a client's requirements identify a negative dilute specimen as passing, a retest will not be required. If the client requirements do not accept a negative dilute result, a new drug screen must be completed within 24 hours of the initial result being received. If an employee then receives a second negative dilute, the result would be considered a positive specimen. Any retest taken will be at the cost of the contractor.

A negative super dilute result will require a retest within 24 hours of notification under direct observation by a same-sex observer. A positive dilute result is considered a positive result and will make the contract employee temporarily ineligible for employment for 180 days from the notification of a positive specimen.

# Drug & Alcohol Use Policy & Procedure

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## Prescription Drug Use

Use of prescription medication must be as advised by a Physician. Prescription drugs will be confirmed with the pharmacy issuing them by the MRO. Under no circumstances should anyone other than the MRO discuss medical or prescription information with the contract employee. Any confirmed positive test result due to use of an expired prescription drug not authorized by a Physician, or use of prescription medication prescribed to a spouse, child, parent or person other than contract employee will be treated as a positive test result making the contract employee temporarily ineligible for employment for 180 days from the notification of a positive specimen.

## Marijuana Usage

Although some states have legalized marijuana for medicinal purposes and/or personal use, Populus Group is not required to allow the use or presence of marijuana in the workplace, nor is it required to permit an employee to be under the influence of marijuana while performing his/her job duties. Even in states where marijuana may be legal in some form, use and possession is strictly prohibited on company property and may result in discipline, up to and including termination.

Populus Group abides by applicable Federal and State laws concerning marijuana. Due to the growing number of state laws which legalize the use of marijuana for medical purposes, Populus Group will not automatically prohibit the hiring of contract employees if the drug screen result for a post-offer, pre-employment test is positive due to medical marijuana and the employee is qualified under that particular state's law as a medical marijuana user. Specific requirements in accordance with the laws in applicable states must be met and all internal and contract employees impacted will be vetted in accordance with those requirements by the MRO and DER.

Populus Group abides by applicable Federal and State laws with regard to all other testing situations when an individual who tests positive for marijuana qualifies under state law as a medical marijuana user.

## Recreational Usage

While the recreational use of marijuana has now been legalized by several states, marijuana remains an illegal drug under federal law and its use in the workplace is strictly prohibited. Populus Group will not automatically decline to hire a prospective employee upon receipt of a post-offer, pre-employment drug test that is positive for recreational marijuana. Rather, the Company will address a positive test result in a manner consistent with the specific requirements of any applicable state laws.

## Post-Accident Testing

Any incident resulting in a work-related injury or illness must be reported to your Populus Group point of contact immediately. Every employee has the right to bring a workplace safety or health concern to the attention of

## Drug & Alcohol Use Policy & Procedure

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Populus Group and the employee's manager or client manager (if applicable), and report a work-related injury, illness or safety concern without fear of retaliation. Any employee involved in an on-the-job incident which results in personal injury to the employee causing the incident; causes injury to another; causes property damage; or, results in the need for action mandated by Federal Regulation or client regulatory requirement, will be referred for consideration of post-accident drug and/or alcohol testing simultaneously or no later than immediately following any treatment for injury.

Employees involved in incidents occurring as a result of equipment failure; an environmental factor; a medical emergency or illness; a repetitive motion injury; a not-at-fault car accident; an injury for which only on-site first aid is required; or, any other cause not consistent with possible drug or alcohol use, will not be referred for testing. When a test panel is not specified in writing by the client, Populus Group will perform a 5-panel drug test. An employee involved in the type of on-the-job incident warranting consideration of, and/or referral for, post-accident drug and/or alcohol testing may be suspended in the sole and absolute discretion of Populus Group pending final test results. Populus Group will comply with all applicable Federal regulations and State and local laws in administering any testing after an incident.

### Follow-Up Testing

Any follow-up testing requirement will be determined by the SAP (Substance Abuse Professional). There needs to be a minimum of at least one follow-up test prior to the employee returning to work.

### For Cause-Reasonable Suspicion Testing

Action will be taken to determine if there is justification for a reasonable suspicion test in accordance with the Reasonable Suspicion Procedure for Alcohol/and or Substance Abuse document. If Reasonable Suspicion is determined the contract employee will be sent for a drug test, as well as a breath alcohol test. The contract employee will be suspended without pay pending result confirmation from the DER. Failure to comply with the testing request may result in immediate termination of the contract employee. Populus Group will comply with all applicable State laws when administering any testing and in conducting reasonable suspicion testing generally.

### Self-Identified Substance Abuse

An employee choosing to disclose a substance abuse problem should contact their HR Representative for assistance.



## Drug & Alcohol Use Policy & Procedure

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### Drug and Alcohol Use Policy Acknowledgement Form

I, \_\_\_\_\_ have received and read a copy of Populus Group's (the "Company") Drug and Alcohol Policy. I have read this policy and have had the opportunity to ask questions. I agree to follow the policy and to accept the penalties, including among others, the penalty of immediate discharge for violating the policy. I understand that my compliance with this policy is a condition of my employment and continued employment. I hereby certify that I am not a current user of illegal drugs.

I hereby give my consent to and authorize the Company, and the testing laboratory designated by The Company, to perform the appropriate tests and procedures to identify the presence of controlled substances. I also give my permission for the results of the controlled substance test to be released to The Company and to The Company's clients requesting my services.

I understand that refusal to take a controlled substance test, provide a sufficient amount of specimen, attempts to adulterate the sample, or a positive test result for controlled substances will result in The Company denying my application for employment or immediately terminating my employment.

I hereby release and hold harmless the Company, its employees, agents, contractors, clients and any persons or other parties disclosing information from any and all liability whatsoever arising from this request for a controlled substance test, from the testing of the sample, and from decisions made concerning my application for or continuation of employment based upon the results of the controlled substance test. I hereby authorize that a photocopy of this authorization may be construed as an original. I also give my permission to the Company to release the results of the controlled substance test, in defense of any claim(s) brought forth in connection with the denial of my application for employment or the termination of my employment.

I acknowledge that the Company's Drug and Alcohol Policy is subject to change at any time without notice, and nothing contained herein shall alter or limit the Company's right to terminate my employment at any time, for any reason, without prior notice.

\_\_\_\_\_  
Printed Name (First, Middle, Last)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

## CONTRACT EMPLOYEE SAFETY HANDBOOK

# CONTRACTOR SAFETY HANDBOOK



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## Management Policy Statement

At Populus Group employee safety is a top priority, and part of that is ensuring that every reasonable effort will be made to prevent accidents and other health risks.

We believe that many accidents can be prevented by taking common sense precautions. If each one of us does our part, including acting and talking with safety in mind, accident prevention and improved safety on the job can be achieved.

We are absolutely committed to the safety of all of our employees; however, Populus Group is unable to directly supervise or control the working environments established by its Clients. As a result, the Clients, as required by law, must exercise primary responsibility for evaluating and correcting unsafe working conditions.

Realizing that accident prevention requires a continued effort, and the participation of all contract employees, it is the firm policy of Populus Group that no part of our job is so important that we cannot take the time to do it safely. Our success depends on the safety and well-being of our contract employees and their families. Therefore, it is imperative that workplace hazards be identified, appropriately evaluated and effectively controlled.

Your cooperation in helping to build safe work environments is required and very much appreciated.

*Nicole Stevens*

Manager of Compliance and Risk Management

## General Safety Procedures and Training

Populus Group is unable to directly supervise or control the working environments provided by its Clients. Therefore, it is the Client's primary responsibility to evaluate and correct unsafe working conditions. As a contract employee you also have an important role.

- » Always make sure that you have been properly trained for the tasks that you have been assigned to perform
- » Immediately notify your Client supervisor or an Populus Group representative if you do not have the necessary training to perform an assigned task
- » Take the necessary time to make sure that you know the Client's safety and operating procedures before starting work
- » Do not attempt to operate any machinery, equipment or hand tools until you have been properly trained

## Code of Safe Practices

All contract employees are required to follow the safety procedures established by Populus Group's Clients. Willful disregard for safety procedures or repeated unsafe acts may be grounds for discipline, including termination of employment.

You are required to report all cases of violence, threats of violence, and unsafe work conditions to the Client supervisor and an Populus Group representative or to the **Safety Hotline at 248-712-8055**.

Be alert! You are ultimately responsible for your own safety.

1. Immediately report any injury or illness to your supervisor and Populus Group representative
2. The use of or possession of drugs or alcohol on the job is prohibited and will be grounds for immediate employment termination
3. The possession of an offensive/defensive weapon on company or Client property is strictly prohibited
4. Horseplay on the job is prohibited and may be grounds for discipline, including employment termination
5. If you do not have current first aid training (Red Cross or American Heart Association), do not move or treat an injured person unless there is an immediate peril, such as profuse bleeding or stoppage of breathing
6. Appropriate clothing and footwear must be worn on the job at all times
7. You shall not perform any task unless you are trained to do so and are aware of the associated hazards
8. You may be assigned certain personal protective safety equipment. This equipment is to be available for use on the job and should be maintained in accordance with the manufacturer

9. Learn safe work practices. When in doubt about performing a task safely, contact your supervisor for instruction and training
10. Learn where fire extinguishers and first aid kits are located
11. Obey all traffic regulations when operating vehicles on public highways.
12. When operating or riding in company vehicles or using your personal vehicle for business purposes, wear your seat belt
13. Maintain a condition of good housekeeping in all work areas at all times
14. Be alert to all hazards that could affect you and your fellow employees
15. Obey all safety signs and tags
16. Always perform your assigned tasks in a safe and proper manner; do not take shortcuts
17. Do not handle or tamper with any electrical equipment, machinery, air or water lines or other potentially hazardous devices in a manner outside the scope of the duties unless you have received specific instructions from your supervisor
18. All cords running into walking areas must be taped down or inserted through rubber protectors to prevent tripping hazards
19. Plug all electrical equipment into appropriate wall receptacles, or into an extension of only one cord of similar size and capacity. Three-pronged plugs should be used to ensure continuity of ground
20. Keep appliances such as coffeepots or microwave ovens in working order and inspect them for signs of wear, heat or frayed cords
21. Keep any individual heaters in work areas clear of combustible materials, such as drapes or waste from wastebaskets. Use only newer heaters that are equipped with tip-over switches
22. Use equipment such as scissors or staplers for their intended purposes only and do not misuse them as hammers, pry-bars or screwdrivers
23. Store files and supplies in a manner that prevents damage to supplies or injury to personnel when they are moved. Store heaviest items closest to the floor and lightweight items above
24. Never stack materials precariously on top of lockers, file cabinets or other high places
25. Store cleaning supplies away from edible items on kitchen shelves.
26. Store cleaning solvents and flammable liquids only in approved containers
27. Keep solutions that may be poisonous or are not intended for consumption in well-labeled containers

28. Wipe all spills promptly. Keep all stairways clear of items that can be tripped over

## OSHA Regulations

Occupational Safety and Health Administration (OSHA) creates and enforces standards or regulations to improve on-the-job health and safety.

### General Duty Clause

Hazards that do not have specific OSHA standards are covered by a clause. The General Duty Clause requires each employer to provide:

"...a place of employment which is free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees."

You should feel safe while in the workplace. If you are fearful for your safety then you should bring it to the attention of your supervisor, and a Populus Group representative, call the **Safety Hotline at 248-712-8055**.

### Medical Screening and Monitoring

Based on the type of work you are performing, medical screening and/ or monitoring may be required. This will be determined based upon the materials being used and the potential for exposure, wearing a respirator, physical effort and duration and environmental hazards. The purpose of medical screening and monitoring is to identify medical conditions which could lead to injury or occupational disease.

Specific test results and other personal medical information generated by the exams will be kept confidential. You have the right to request copies of your medical or exposure records at any time by contacting your Populus Group representative or the **Safety Hotline at 248-712-8055**.

## Chemical Handling & Hazard Communication

Federal law requires that you receive hazard communication training before handling hazardous chemicals in the workplace.

Do not handle any chemical products or hazardous materials of any kind until you have been trained in the following topics:

- » The characteristics of the chemicals
- » The health hazards of the chemicals
- » Proper handling and safe use procedures
- » Proper storage and disposal
- » First aid procedures
- » The location of the Client's hazard communication program, chemical inventory and material safety data sheets (MSDS)



The law requires that you have hazard communication training and access to all MSDS available for the hazardous chemicals that are located in your workplace.

## Safety Hazard Identification

Accidents are caused by unsafe conditions and unsafe acts. To prevent accidents, we must know how to identify unsafe conditions and acts and then take action to correct them. Safety hazards exist in the following forms:

- » Acceleration
- » Biological
- » Chemical
- » Electrical
- » Ergonomics
- » Explosives
- » Flammability and Fire
- » Heat/Cold
- » Mechanical
- » Pressure
- » Radiation
- » Vibration and Noise
- » Violence

## Controlling Hazards

### Engineering Controls

- » Process design
- » Isolation through closed systems
- » Ventilation and humidifying systems
- » Protection at points of operations
- » Ergonomic designs

### Administrative Controls

- » Supervision
- » Personnel rotation
- » Periodic breaks
- » Reduction in duration of exposure
- » Education

### Personal Protective Equipment (PPE)

- » Face shields
- » Aprons
- » Respirators
- » Gloves
- » Safety shoes, etc.

## What to do when you find a safety hazard

Immediately report any safety hazards to Client supervisor and your Populus Group representative.

## Personal Protective Equipment (PPE)

Contract employees will receive training on any "site-specific" personal protective equipment as part of the Populus Group Client's site-specific safety and health program.

PPE for eyes, face, head and extremities shall be used and maintained according to the manufacturers' instructions and in the guidelines outlined below.

### Eye & Face Protection

All contract employees shall be provided with and wear eye and face protection, such as safety glasses, goggles and splash shields, when working in areas where machines or operations pose an injury threat from physical, thermal or chemical splash exposure and in all areas as directed by the Populus Group Client's site-specific health and safety programs.



### Respiratory Protection

All contract employees must receive respiratory protection training and be enrolled in Populus Group medical screening program before being placed on a project requiring the use of a respirator.

**YOU MUST CONTACT YOUR POPULUS GROUP REPRESENTATIVE IMMEDIATELY IF A CLIENT REQUIRES YOU TO WEAR ANY FORM OF RESPIRATORY PROTECTION.**

### Hearing Protection

In an effort to prevent any temporary or permanent hearing loss, all Populus Group contract employees working in the vicinity of any machinery or devices that create unwanted noise levels in excess of 85 decibels must be provided with and wear adequate hearing protection devices. All contract employees must also be familiar with the Populus Group Client's site-specific hearing conversation measures and follow them accordingly.

### Head Protection

All persons exposed to hazards to the head including but not limited to: overhead hazards, sunlight, cold temperatures and chemical splash; and in any area deemed necessary by an Populus Group Client's protocol, will wear appropriate headgear. All hard-hats shall be worn properly with the "bill" forward and shall be free of excessive stickers and advertisements.

### Foot Protection

Protective footwear, such as rubber boots, steel toe shoes and protective covers, shall be worn by all persons exposed to hazards to the feet, including but not limited to: crushing, puncture, electric shock, cold temperatures, slippery surfaces and chemical contamination.

## Hand Protection

Appropriate hand protection shall be provided and worn by all persons exposed to hazards of the hands, including but not limited to: cuts, abrasions, thermal extremes, poisonous vegetation, electric shock and chemical exposure.

## Fall Protection

Falls may result from a number of factors, including unstable working surfaces, misuse of fall protection equipment and human error. Studies have shown that the use of guardrails, fall arrest systems, safety nets, covers and travel restriction systems can prevent many of the deaths and injuries that result from falls.

Populus Group employees and safety representatives must work closely with Client management to identify and reduce fall hazards. Where engineering controls alone do not mitigate the hazard, the use of approved fall protection equipment is required. Each employee should examine his or her work area continually to identify potential fall hazards and find ways to reduce those hazards as much as possible. Communication with your immediate supervisor and/or Populus Group safety representatives is important in maintaining a safe work area and controlling fall hazards.

Strict adherence to OSHA, Client and Populus Group standards regarding the use of fall protection equipment is required of all employees. Proper use, care, storage and inspection of fall protection equipment is mandatory. Any concerns about fall protection equipment must be addressed immediately.

## Safe Lifting Techniques

Improper lifting techniques are the single most common cause of back pain and injuries in the workplace. Following simple lifting and handling guidelines can reduce the strain on your back and greatly reduce the chance of back injury.

### Pre-Lifting

Before lifting any object, you should first determine if mechanical lifting devices are available to assist you in accomplishing the task. Mechanical devices include forklifts, dollies and hoists. If these devices are unavailable, other options such as splitting the load into smaller ones or finding someone to share the load should be considered.

### Safe Lifting Practices

In order to avoid back injury while lifting, observe the following safe lifting practices:

- » Over-reaching and stretching to reach overhead objects may result in strains or falls. Use a ladder instead of chairs, boxes, etc.
- » Stack material to permit full view while carrying
- » Always use proper personal protective gear. Hand protection and safety shoes are a must for most lifting jobs
- » When lifting and carrying with another person - teamwork is important. The load should be equally distributed. Movements must be coordinated so you both start and finish the lift action

at the same time and perform turning movements together. When two people carry a long object, it should be held at the same level by both and on the same side of the object

## Performing the Lift

When you need to lift an object, perform the following steps to prevent back injury:

- » Approach the load and size it up - weight, size, shape. Plan your lift before you start - where you will grip it, where it is going, the path you will follow and how to put it down
- » Consider your physical ability to handle the load. Tip the load on its side to get an idea of its weight. If it is too heavy, get help or use a hand truck
- » Place one foot alongside the object and one foot behind it. Keep feet comfortably spread and firmly on the floor with your body weight centered over your feet
- » Bend your knees and get a good handhold on the object using the palm of your hand. Tuck in your chin and keep your back straight
- » Lift the load straight up - smoothly and evenly - using your leg muscles. Keep the load and your arms close to your body
- » Lift the object into carrying position. Do not twist or turn while carrying a heavy load. Turn your body with changes of foot position while making sure your path is clear of slipping or tripping hazards
- » Setting the load down is just as important. Using leg and back muscles, comfortably lower the load by bending your knees. When the load is positioned, release your grip. A helpful hint is to avoid strain by storing heavy objects at least 12 inches above the floor

## Ergonomics

Ergonomics is the science of fitting the job to the worker.

Workers who must repeat the same motion throughout their workday, do their work in an awkward position, use a great deal of force to perform their jobs, repeatedly lift heavy objects or who face a combination of these risk factors are most likely to develop Work-Related Musculoskeletal Disorders (WMSDs).

Preventing injury involves adjusting the work environment to reduce, repetitive motion, heavy lifting, jolts, vibrations and awkward positions.

## Computer Fitness

If you work with a computer, discomforts and sometimes more serious ailments may result from sitting in one position, staring at a screen terminal for long periods or repetition of movements.

There are various ways to reduce the strains associated with computer work, including the following:

- » Relieve tense muscles by moving and stretching every hour
- » Break your hours at the terminal with other types of work
- » Blink often or look away from the terminal



- » Make sure the lighting is adjusted to prevent glare
- » Adjust your workstation to fit your body

Because everybody is different, it is important to personalize your workstation. When your work area fits your body, you suffer less fatigue. Listen to your body and take active steps to ensure a comfortable relationship between you and your workspace. If your workspace cannot be adjusted to fit your body, talk to your supervisor or Populus Group representative.

## Hand & Power Tools

Tools are such a common part of our lives that it is difficult to remember that they may pose hazards. Contract employees who use hand and power tools and are exposed to the hazards of falling, flammable and splashing objects or to harmful dusts, fumes, mists, vapors or gases, must be provided with the appropriate PPE.

Five basic safety rules can help prevent hazards associated with the use of hand and power tools:

- » Keep all tools in good condition with regular maintenance
- » Use the "right" tool for the job
- » Examine each tool for damage before use and do not use damaged tools
- » Operate tools according to the manufacturer's instructions
- » Provide and properly use the right personal protective equipment

### THE GREATEST HAZARDS POSED BY HAND TOOLS RESULT FROM MISUSE AND IMPROPER MAINTENANCE.

Populus Group's Client is responsible for the safe condition of tools and equipment used by employees. Employers shall not issue or permit the use of unsafe hand tools, even tools supplied by the contract employee. Employees should be trained in the proper use and handling of tools and equipment.

To prevent hazards associated with the use of power tools, contract employees should observe the following general precautions:

- » Never carry a tool by the cord or hose
- » Never yank the cord or the hose to disconnect it from the receptacle
- » Keep cords and hoses away from heat, oil and sharp edges
- » Disconnect tools when not using them, before servicing and cleaning them, and when changing accessories such as blades, bits and cutters
- » Keep all people not involved with the work at a safe distance from the work area
- » Secure work with clamps or a vise, freeing both hands to operate the tool
- » Avoid accidental starting. Do not hold fingers on the switch button while carrying a plugged-in tool
- » Maintain tools with care; keep them sharp and clean for best performance
- » Follow instructions in the user's manual for lubricating and changing accessories
- » Be sure to keep good footing and maintain good balance when operating power tools

- » Wear proper apparel for the task. Loose clothing, ties or jewelry can become caught in moving parts
- » Remove all damaged portable electric tools from use and tag them: "Do Not Use"

## Machine Guarding

Any machine part, function or process which may cause injury must be safeguarded. When the operation of a machine or accidental contact with it can injure the operator or others in the vicinity, the hazards must be either controlled or eliminated.

As a **contract employee** you should:

- » Never operate tools or machinery without obtaining permission
- » Always have the supervisor demonstrate the safe way to operate machines or equipment
- » Never clean, repair or service equipment or machines while in operation
- » Never wear loose clothing or jewelry which can catch in the machinery and restrain long hair
- » Never leave a machine or equipment unattended while in operation
- » Never remove or alter guards in any manner
- » Always guard safety devices used for your protection. If you can reach into the point of danger, the machine or equipment is not guarded. Notify your supervisor

## Lockout/Tagout

The purpose of lockout/tagout is to prevent injuries due to accidental machine and/or equipment start-up or the unexpected release of "stored energy" when maintenance or service is performed on machinery or equipment. Stored energy includes:

- » Electrical
- » Mechanical (pulleys, wheels, gears)
- » Pneumatic (arms, rams, presses)
- » Fluid and gas
- » Hydraulic (pistons, rams, presses)
- » Thermal (steam, hot water)
- » Gravity
- » Chemical

No contract employee shall engage in any work activity that involves the use of lockout/tagout procedures or devices unless trained by the Populus Group Client as an "authorized person." An "authorized person" is an employee specifically trained and designated as one who locks out or tags out machines or equipment, to perform servicing or maintenance.

## Electrical Safety

Electrical injuries consist of four main types: electrocution (fatal), electric shock, burns and falls caused as a result of contact with electrical energy.

## **Working on or near Energized Equipment**

- » Check and double check the safety regulations when a ladder or parts of any vehicle or mechanical equipment structure will be elevated near energized overhead power lines. Call your local electric utility for assistance. People standing on the ground may be particularly vulnerable to possible injury
- » Wear protective clothing and equipment and use insulated tools in areas where there are possible electrical hazards
- » De-energize and visibly guard (where possible) whenever contact with uninsulated overhead power lines is possible
- » Do not wear metal objects

## **Cord-Powered Equipment and Tools, Cords & Temporary Wiring**

- » Protect flexible cords and cables from physical damage
- » Keep slack in flexible cords to prevent tension on electrical terminals
- » Check cords for cut, broken or cracked insulation
- » Extension cords are for temporary use. Install permanent wiring when use is not temporary

## **Equipment and Tool Grounding**

- » Verify that all three wire tools and equipment are grounded
- » Water, electrical equipment and power cords do not mix! Use ground fault circuit interrupter protection in wet or damp environments
- » Ground exposed parts of fixed equipment that could become energized

## **Other Considerations**

- » Verify location of all buried or embedded electrical circuits before digging or cutting
- » Determine the reason that a fuse operated, or circuit breaker tripped before replacing or resetting
- » Know where your overcurrent devices are (i.e. circuit breakers and fuses) so they can be easily and quickly reached in case of emergency
- » When replacing lamps and bulbs, verify replacement matches fire requirements

## **Overhead Lifting Devices**

Overhead lifting devices come in many different forms, including cranes and hoists. There are many things to consider when working in an environment where overhead lifting devices are being used.

OSHA requires that only authorized personnel operate overhead lifting devices. When in close proximity to an overhead lifting device, employees must be wearing the appropriate PPE according to the company's overhead lifting policy, and the employee must be supervised by a competent person.

When employees are using overhead lifting devices, the person operating the device must have appropriate training including

on-the-job training provided by the Client. Before using the overhead lifting device, the operator must check the environment to make sure their area is clear of hazards, and they must be conscious of where hazards could appear. Operators must also check all equipment prior to use; it is the operator's responsibility to make sure that all devices used in the lift are in proper working order.

If an employee is working in an area in which an overhead lifting device is in use, the employee must be aware of the cranes location and where it is going at all times to avoid an accident or incident.

When in the area of an overhead lifting device, employees should never walk in the path of the lift and/or carry. Overhead lifting devices that are locked out should not be tampered with. Be aware of any signs informing employees of the status of the lifting device.

## Forklifts

Improper forklift operation can lead to property damage, injuries and death. The following general guidelines must be followed.

As a **contract employee** you should:

- » NEVER operate a forklift without proper specific training and signoff. If a forklift needs to be used, contact your PG representative to find a specifically trained and authorized person to do so
- » ALWAYS receive training and signoff, prior to operating any forklift, powered industrial truck or powered pallet jack. You must also demonstrate a clear understanding of the capacities and limitations, and fully understand the site safety plan for operation in the areas in which you are authorized. The Client is responsible for providing this training
- » NEVER use a forklift for a purpose other than it was designed for
- » ALWAYS operate in a safe manner, which does not endanger any persons or property, and in accordance with the safety procedures established for the job site
- » ALWAYS conduct a pre-operational check per Client's policies and procedures
- » ALWAYS wear your seatbelt if so equipped
- » Wear appropriate clothing and protective equipment
- » Make sure the load does not exceed the forklift capacity
- » Center the forks to evenly distribute the weight
- » Make sure the load is balanced and secure
- » Check for overhead obstructions
- » Drive into the load as far as possible
- » Lift the load slightly and tilt it back
- » Lower the load to the safe traveling height before moving

## Scissor Lifts

The majority of manufacturers and operators have strict safety criteria for the operation of scissor lifts. In some states, licensing is also required.

Most scissor lifts have fitted guard rails around the platform, in order to help contain operators and passengers. This is supplemented by a restraining point, which is designed to secure a harness or fall arrestor.

Do not operate a scissor lift unless you have specific training on the type and model of lift and authorization to do so. If instructed to do otherwise, please report the occurrence to the site safety manager or your Populus Group representative.

## Scaffolding

Many construction accidents result from improper construction and use of scaffolds. Height is not the only factor – short falls are also dangerous as are items falling from the scaffold.

- » Scaffolds must be sound, rigid and sufficient to carry its own weight plus four times the maximum intended load without settling or displacement
- » Scaffolds must be erected on solid footing. Do not use unstable objects, such as barrels, boxes, loose bricks or concrete blocks to support scaffolds or planks
- » Scaffolds must not be erected, moved, dismantled or altered except under the supervision of a competent person
- » Scaffolds must be equipped with guardrails, mid-rails and toe-boards
- » Scaffolds accessories such as braces, brackets, trusses, screw legs or ladders that are damaged or weakened from any cause must be immediately repaired or replaced
- » Scaffold platforms must be tightly planked with scaffold plank grade material or equivalent
- » A "competent person" must inspect the scaffolding at designated intervals
- » Rigging on suspension scaffolds must be inspected by a competent person before each shift and after any occurrence that could affect structural integrity to ensure that all connections are tight and that no damage to the rigging has occurred since its last use
- » Synthetic and natural rope used in suspension scaffolding must be protected from heat-producing sources
- » Employees must be instructed about the hazards of using diagonal braces as fall protection
- » Scaffolds can be accessed by using ladders and stairwells
- » Scaffolds must be at least 10 feet from electric power lines

## Slips, Trips & Falls

Slips are primarily caused by a slippery surface and compounded by wearing the wrong footwear. Shoes with cleated, soft rubber soles and heels provide better traction and are recommended for work situations. In work areas where the walking and working surface is likely to be slippery, non-skid strips or floor coatings should be used. If the working surface is very slippery, no footwear will make it safe to walk on.

Proper housekeeping in work and walking areas can contribute to safety and the prevention of falls. Not only is it important to maintain a safe working environment and walking surface, these areas must also be kept free of obstacles, which can cause slips and trips.

Objects of any kind should never obstruct these areas.

Adequate lighting to ensure proper vision is also important in the prevention of slips and falls. Carrying an oversized object can also obstruct one's vision and result in a slip or a trip. This is a particularly serious problem on stairs.

There are specific behaviors, which can lead to slips, trips and falls, including walking too fast, or running, distractions, not watching where we are going, carrying materials which obstruct our vision, wearing sunglasses in low-light areas and failure to use handrails.

## **Falls on Stairs**

Persons using the stairwell should have one hand free to be able to use the handrail. Whenever possible, avoid carrying heavy or bulky objects which obscure your vision and/or require the use of both hands. Carry smaller, lighter loads and make more trips or obtain help with the load.

## **Ladders**

Prevention of falls from ladders requires proper planning, correct ladder selection, good work procedures and adequate ladder maintenance.

Prevention tips:

- » Do not hand-carry loads on a ladder
- » Do not try reaching so far that you lose your balance; move the ladder
- » Non-skid feet or spurs may prevent a ladder from slipping on a hard, smooth surface
- » Do not stand on the ladder's top three rungs
- » A damaged side rail may cause one side of a ladder to give way
- » The base should be spaced 1 foot away for every 4 feet it reaches up
- » Ladders used to reach a walking surface or roof must extend at least 3 feet beyond
- » Extension ladders need both locks holding to prevent overloading a rail
- » Stepladders should be securely spread open. Never use a folding ladder in an unfolded position
- » Electrical shock can occur with metal or wet wooden ladders. Not only is the shock itself dangerous, but it can cause falls resulting in injury

## **Falls from Vehicles and Equipment**

Death or serious injury is a frequent result of extra riders falling from tractors, equipment or the bed of a truck. Riding on tractor fenders, drawbars on equipment or the bed of a truck is an invitation for an accident.

## **Loading Docks**

Loading docks and ramps are dangerous areas. They are frequently congested, heavy-traffic areas and working and walking surfaces are often wet. Metal dock plates can wear smooth and become very slippery; in particular, the edge of dock plates invite trips and falls.

Accidental backward steps can result in a fall from the dock. Portable railings, which can be easily removed from the edge of the dock, could prevent many dangerous falls. They are removed when a truck or tractor is at the dock and replaced as soon as the truck or trailer leaves.

## Confined Space

OSHA defines a confined space as an enclosed space that is large enough for an employee to enter and perform assigned work but is not designed for human occupancy and has a limited or restricted entrance or exit.

Limited or restricted entrance or exit occurs when the ability to easily exit or escape in an emergency is impeded by obstacles such as a manhole, a small door or opening, a ladder or a tunnel. Normally, a trench is not considered a confined space but, in some cases, open areas surrounded by a retaining wall can create areas that are to be treated as confined spaces.

Some basic principles to remember are that confined spaces can be deadly and confined space conditions can change rapidly from non-hazardous to life threatening. Some confined spaces are so hazardous that a written permit system must be used prior to entry.

Some examples of confined spaces are tanks, manholes & sewers, boilers, grain storage bins, aircraft fuel cells or tank farms with retaining walls that can trap vapors in an area that is difficult to ventilate.

The specific hazards may include hazardous materials, engulfing materials, entrapment, moving parts and electrical or other sources of energy.

Employers are required to assess confined spaces hazards in the work place, engineer a way to eliminate or reduce the hazard and develop policies and procedures to control access to confined space areas, including a written permit system.

Each Populus Group employee is required to know and adhere to the Client's confined space program. Questions or concerns should be addressed prior to entering any environment that may be hazardous. The requirements of the Client's permit system are to be strictly adhered to.

Your immediate Client supervisor is your contact for confined space information at the work site, and your Populus Group representative should be made aware of any concerns you need to have addressed.

## Heat-Related Illness

Heat related illness results from a combination of factors, including environmental temperature and humidity, direct radiant heat from the sun or other sources, lack of air flow and workload. Personal factors such as age, weight, level of fitness, medical condition, use of medications and alcohol affect how well the body deals with excess heat.

Populus Group employees will follow the guidelines provided by the Client to minimize and prevent heat related illnesses.

Heat related illness usually occurs in stages. The signal of the first stage is heat cramps in muscles. If you recognize a person who has heat cramps, have him or her stop activity and rest. If the person is fully awake and alert, have him or her drink small amounts of cool water or a commercial sports drink. Gently stretch the cramped muscle and hold the stretch for about 20 seconds, then gently massage the muscle. Repeat these steps if necessary.

The second, more serious stage of heat related illness, is heat exhaustion. Symptoms include:

- » Cool, moist, pale skin (skin may be red after physical activity)
- » Headache
- » Dizziness and weakness or exhaustion
- » Nausea
- » The skin may or may not feel hot

Get the person to a cooler place and have him or her rest. If fully awake, have the individual drink a glass of cool water every 15 minutes. Do not let the person drink too quickly. Remove or loosen tight clothing and apply cool, wet cloths. Call 9-1-1 or the local emergency number if the person refuses water, vomits or loses consciousness.

The last stage of heat related illness is heat stroke. Symptoms include:

- » Vomiting
- » Decreased alertness or complete loss of consciousness
- » High body temperature
- » Skin may still be moist, or the victim may stop sweating and the skin may be red, hot and dry
- » Rapid, weak pulse
- » Rapid, shallow breathing

Heat stroke is a life-threatening situation. Call 9-1-1 or the local emergency number. Move the person to a cooler place. Quickly cool the body. Wrap wet sheets around the body and fan. If you have ice packs or cold packs, wrap them in a cloth and place them on the victim's wrists and ankles, in the armpits and on the neck to cool the large blood vessels. Watch for signals of breathing problems and make sure the airway is clear. Keep the person lying down.

## Asbestos

Asbestos is a naturally occurring group of minerals that can only be identified under a microscope. In structures built prior to 1978, asbestos may have been used in heat and acoustic insulation, fire-proofing as well as roofing and flooring. It may also be found in some of the more common products including:

- » Textured paints
- » Electrical wires
- » Building insulation
- » Carpet underlays
- » Roofing materials
- » Hair dryers



- » Floor tiles
- » Cements
- » Brake pads and linings
- » Wall and ceiling panels
- » Pipe and duct insulation
- » Toasters and other household appliances
- » Patching and spackling compounds
- » Pot holders and ironing board pads
- » Furnaces and other furnace door gaskets

***You should not be working with asbestos as an Populus Group employee.*** If you find that your work involves any form of contact or exposure to asbestos, please contact your Populus Group representative or the ***Safety Hotline at 248-712-8055.***

## Bloodborne Pathogens

Blood and other body fluids can carry pathogens such as HIV and the hepatitis B virus. Treat all blood and body fluids as if they are infectious.

### Protect Yourself

- » If you have breaks in your own skin – especially open cuts, scrapes or rashes – keep them covered
- » Wear impermeable (latex) gloves before touching anybody fluid
- » Wear any other protective clothing as necessary, such as glasses, goggles, masks, gowns or face shields
- » Special attention should be given to prevent fluid contact with the face area, especially the eyes, nose and mouth

### Afterwards

- » Immediately wash your hands with soap and water
- » Perform proper clean up with chemical germ killers (commercial germicide or bleach/water solution at 1:10 ratio). Note – never perform clean up unless you have been properly trained and have on proper protective clothing and equipment
- » Dispose of waste properly

If you feel you have been exposed to a bloodborne pathogen while at work, inform your Client supervisor and an Populus Group representative immediately.

## Emergency Preparedness & Evacuation

All contract employees shall become familiar with the emergency preparedness and evacuation plan for each Populus Group Client assignment.

## Fires

All contract employees shall become familiar with the fire prevention and protection plan at the Populus Group Client assignment.

- » Know the location of all fire exits, and escape routes and shelters in place
- » Do not use fire extinguishing equipment unless you have been properly trained
- » Use caution when handling flammable or combustible materials

## Reporting

Report all injuries, illnesses, unsafe acts or dangerous conditions to your Client supervisor and your Populus Group representative immediately.

Your safety and health is a primary concern to Populus Group. To ensure that your safety concerns have been addressed to your satisfaction, Populus Group has also instituted a toll-free number for you to report any unresolved safety or health concerns in your work place.

Please attempt to resolve all issues at the Client level before contacting this number. All reports are kept confidential when requested to the extent permitted by law.



**SAFETY HOTLINE**

**248-712-8055**

*In this Contract Employee Safety Handbook, the term "OSHA" refers to the Federal Occupational Safety and Health Administration (OSHA) or state approved safety and health programs. Furthermore, this Contract Employee Safety Handbook is not inclusive of all rules covered under OSHA, therefore, as required by law, Clients must exercise primary responsibility for evaluating and correcting unsafe working conditions.*

## Verification of Instruction

I, \_\_\_\_\_, have read the Populus Group Contract Employee Safety Handbook and understand that:

1. I am to receive site-specific safety training from Populus Group Client before beginning my assignment.
2. I am to wear all appropriate personal protective equipment required by my assignment.
3. I am to report any injury or illness IMMEDIATELY to the Client supervisor and my Populus Group representative.
4. I am to report any unsafe condition or situation that I am untrained to handle to my Client supervisor, Populus Group representative, or to the Populus Group Safety Hotline.
5. I understand that Populus Groups Client may have site specific training that is required as part of my assignment at the Client. I understand that I will be reposonsible for completing these trainings, should I have any questiong regarding these trainings I will reach out to the Client and my Populus Group representative.

**Accepted By:**

**Accepted By: POPULUS GROUP LLC.**

\_\_\_\_\_  
(Contract Employee Signature)

\_\_\_\_\_  
(POPULUS GROUP, LLC. Representative Signature)

\_\_\_\_\_  
(Contract Employee)

\_\_\_\_\_  
(POPULUS GROUP, LLC. Representative)

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
(Date)

# INJURIES & WORKER'S COMPENSATION



Safety is a top priority, but accidents can happen. We're here to help!

## What if I get injured at work?

Here are the steps if a workplace injury does take place.

1. Notify your supervisor at your work location immediately or within 30 minutes of injury.
2. Call your Populus Group point of contact. If you're unable to reach your point of contact, call our Health & Safety team at 248-712-8055.
3. Then we need you to report your injury ASAP -> <http://learn.populusgroup.com/workplace-safety-home-page>
4. Once your injury report is received, Populus Group will submit the report to the insurance company for processing. A representative from our Health and Safety department will contact you ASAP.
5. All doctors notes must be sent to [workerscomp@populusgroup.com](mailto:workerscomp@populusgroup.com), we will update your manager with all changes, your managers should NOT be receiving your doctor notes.

## Is my accident considered a workplace accident?

When and where an incident occurs will determine coverage. Here are some general guidelines:

### Injuries Covered:

- » Injuries that occur while on the job
- » If you drive as part of your job duties, injuries that occur while driving during your work hours.

### Injuries Not Covered:

- » Travel to and from work (before & after hours)
- » After-hours dinner or other work events

\*If you are unsure, don't hesitate to call with your question.

## Who to contact with questions:

<b>Populus Group Contacts</b>
Your Populus Group Representative
Health & Safety Team Monday-Friday 8am-5pm EST 248-712-8016 - Hotline – 248-712-8055
<b>Workers Compenstation Company</b>
CNA – you should hear from them after you've returned your injury forms.

\*\*These are Populus Groups polycys and procedures, during all contract assignments you are employed under Populus Group you must follow and abide by all of Populus Groups Injury process polycys and procedures. If instructed, you may follow the clients injury reporting directions but all injurys, questions and concerns need to be reported and directed to Populus Group.