



## COMPANY GUIDE

## Mission Statement

This Company Guide (Guide) sets forth the information necessary for the success of your employment with Elite Investigations Ltd. ("Elite" or the "Company") This has been prepared to provide our employees with a general understanding of our personnel policies, work rules and benefits. All questions regarding this Guide should be directed to a manager, a supervisor or Human Resources

## **Equal Employment Opportunity**

Elite is an equal opportunity employer. It is our policy to provide equal employment opportunities to all employees and on the basis of his or her qualifications for the job without regard to race, color, religion, age, gender, national origin, sexual orientation, citizenship status, disability, any other legally protected status. This policy governs all aspects of employment including, but not limited to hiring, recruitment, compensation, training, apprenticeship, promotions, demotions, transfer, layoffs, terminations, and any other term or condition of employment. All employment decisions are based solely on relevant criteria, such as knowledge, skills and abilities (SKEs), qualifications, experience, relevant education, training, and suitability. Elite expressly prohibits any form of unlawful employee harassment or discrimination based on any of the characteristics mentioned above.

## **Employment At-Will**

Employment at the Company is at-will. Employment at-will may be terminated with or without cause and with or without notice at any time by an employee by the Company. No employee of the Company has authority to enter into an agreement for employment for any specified period time or to make an agreement for employment other than at-will. Only the owners of the Company have the authority to make any such agreement, such agreement shall only be in writing.

All salary figures provided to an employee in annual, weekly or monthly terms are stated for the mere convenience or to facilitate comparisons and are not intended and do not create an employment contract for any specific period.

## **American with Disabilities Act Policy**

Pursuant to the federal Americans with Disabilities Act ("ADA"), and state and local Human Rights Laws, to ensure that equal employment opportunities to qualified individuals with a disability, Elite will reasonably accommodate a qualified individual with known physical or mental disabilities or handicaps. Elite is not required, however, to provide accommodations that create an "undue hardship" on the business operations of the company. This policy applies to all aspects of employment, including job selection, job assignment, compensation, discipline, termination, and access to benefits and training. Employees who may require a reasonable accommodation should contact Human Resources Department.

*Any applicant / employee that requires an accommodation in order to perform the essential functions of the job should contact the HR office in order to request such an accommodation in writing by completing a form. The Company then will investigate to identify the barriers that interfere with the equal opportunity of the applicant or employee to perform his or her job. The Company will respond in writing, and identify possible accommodations, if any, that will help*

*eliminate the limitation. If the accommodation is reasonable and will not impose an undue hardship, the Company will make the accommodation.*

### **Immigration and Reform and Control Act**

It is Elite's policy to fully comply with the regulations of the Immigration Reform and Control Act of 1986 (as amended) enforced by the Department of Homeland Security. All new hires will be required to complete the Federal I-9 form, Employment Eligibility Verification Form, upon application for employment.

### **Anti-Discrimination and Anti-Harassment Policy**

It is also Elite's policy to prohibit harassment and discrimination of one employee by another employee or third-party, including, but not limited to, harassment on the basis of race, color, marital status, ancestry, sex, religion, age, gender identity, national origin, sexual orientation, citizenship status, disability or other characteristics protected by state and federal law, is prohibited. The purpose of this policy is not to regulate employees' personal morality. Rather, it is to assure that, in the workplace, no employee harasses another on any of the aforementioned basis. While it is not easy to define precisely what discrimination and harassment are, Elite adheres to the following general definitions:

Discrimination includes conduct or comments directed towards any individual(s) based on that individual's race, color, religion, age, gender, national origin, sexual orientation, marital status, disability, or any other status protected by law or regulation that affects or impacts a term or condition of that individual's employment.

Harassment is a conduct that has the purpose or effect of creating an intimidating, hostile, or offensive work environment; has the purpose or effect of substantially or unreasonably interfering with an individual's work performance; or otherwise adversely affects an individual's membership in a protected class. Harassment includes but is not limited to epithets, jokes, pranks, intimidating acts based on race, color, ancestry, religion, age, disability or other characteristic protected by state and federal law.

### **Sexual Harassment Prevention Policy**

It is Elite's policy to prohibit harassment of one employee by another employee, or third-party on the basis of sex. The purpose of our policy is not to regulate our employees' personal morality. It is to assure that, in the workplace, no employee is subject to sexual harassment.

1. Elite's policy applies to all employees, applicants for employment, interns, whether paid or unpaid, contractors and persons conducting business, regardless of immigration status, with Elite. In the remainder of this document, the term "employees" refers to this collective 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 (e.g., counseling, suspension, 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. Elite will not tolerate such retaliation against anyone who, in good faith, reports or provides information about suspected sexual harassment. Any employee of Elite 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 working in the workplace who believe they have been subject to such retaliation should inform a supervisor, manager, or HR. 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 Elite Investigations 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. Elite 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. Elite 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 to your direct supervisor or HR. Elite will provide all employees a complaint form for employees to report harassment and file complaints at their requests.

7. Managers and supervisors are required to report any complaint that they receive, or any harassment that they observe or become aware of, to HR.

8. This policy applies to all employees, paid or unpaid interns, and non-employees and all must follow and uphold this policy. This policy must be provided to all employees and should be posted prominently in all work locations to the extent practicable (for example, in a main office, not an offsite work location) and be provided to employees upon hiring.

#### 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 on the basis of 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:
  - o Touching, pinching, patting, kissing, hugging, grabbing, brushing against another employee's body or poking another employee's body;
  - o Rape, sexual battery, molestation or attempts to commit these assaults.
- Unwanted sexual advances or propositions, such as:
  - o 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;
  - o 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:
  - o 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:

- o Interfering with, destroying or damaging a person's workstation, tools or equipment, or otherwise interfering with the individual's ability to perform the job;
- o Sabotaging an individual's work;
- o 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. Elite Investigations cannot prevent or remedy sexual harassment unless it knows about it. Any employee, paid or unpaid intern or nonemployee who has been subjected to behavior that may constitute sexual harassment is encouraged to report such behavior to a supervisor, manager or HR. Anyone who witnesses or becomes aware of potential instances of sexual harassment should report such behavior to a supervisor, manager or HR.

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. The sexual harassment complaint form can be requested to an HR Rep or alternatively through our website <https://www.eliteinvestigation.com/>

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 sexual harassment to HR.

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

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, commenced immediately 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. Elite 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, HR 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 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. The Complaint Form can be found on the Employee section of Elite’s website and can also be retrieved from an HR staff member.

- 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.

## **Harassment Training**

Elite Investigations Ltd. has zero tolerance for any form of harassment and provides appropriate, and requires, Anti-Harassment training and workplace Harassment training to help employees to recognize situations that may involve harassment and discrimination and identify what to do when the experience or witness these situations. All employees are required to train current employees at least once per year.

## **Workplace Violence, Bullying and Respect**

Employees must have a workplace free of fear, intimidation and threats, i.e., (verbal, physical, gesture, cyber, etc.), and feel safe in their working environment in order to do their jobs. Any conduct that threatens, intimidates, or coerces another employee, a client, or a member of the public, including off-duty times, will not be tolerated. This includes all acts of harassment, including harassment as defined in Elite's equal employment policy. Elite prohibits the possession of weapons on its property at all times, including our parking lots and company vehicles.



All threats of violence, both direct and indirect, or actual violence, should be reported as soon as possible to the immediate supervisor, manager, or Human Resources. These threats may originate from employees, clients, vendors, solicitors or members of the public. Elite will initiate an immediate investigation related to any reported threats of violence, suspicious person(s) or activity. The identity of the person(s), making Elite aware of the situation, will be kept confidential to the extent practical. Elite may suspend an employee with or without pay, pending the outcome of any investigation to maintain workplace safety. Any employee found to have engaged in any of the aforementioned conduct will be subjected to prompt disciplinary action up to and including termination and their conduct may be reported to the local law enforcement agency. Retaliatory conduct towards any employee or other person as a result of reporting behavior in violation of this policy will not be tolerated.

Elite encourages employees to bring disputes or differences with other employees to the attention of a supervisor or manager, and in his/her absence, the next level of management, and or Human Resources, BEFORE the situation escalates further. Elite is eager to assist in the resolution of employee disputes and will not retaliate against employees for raising such concerns.

## **Safety**

Elite makes every effort to comply with federal, state and local occupational health and safety laws, including those of the Federal Occupational Safety and Health Administration ("OSHA"), by providing a safe and secure work environment. Elite, however, needs the help of its employees in maintaining a safe and healthy workplace. Please notify your supervisor of any health or safety concerns you have regarding your workplace. To this end, employees must exercise good judgment to prevent workplace injuries to themselves or others and MUST report all injuries (regardless of how minor they may seem) within 24 hours to management. Such reports are required and required to comply with Worker's Compensation and OSHA laws.

The following are some general safety rules and precautions that all Elite employees are expected to follow:

- Employees are expected to obey safety rules and to exercise caution in all work activity.
- Employees must immediately any unsafe condition to the employee's supervisor or manager of the client or to any Elite supervisor or manager.
- Employees who violate safety standards, who cause hazards or dangerous situations, may be subject to disciplinary action up to and including termination.
- Employees, who fail to report hazardous situations, or when practical remedy such situations, may be subject to disciplinary action up to and including termination.
- Employees are required to know all safety procedures for their positions.
- Employees are encouraged to recommend ideas that will improve safety. (This notification may be done anonymously and under no circumstances with fear of any reappraisal.)

### **Right to Inspect:**

Elite reserves the right to inspect company property. There is no expectation of privacy in work areas, lockers, computers and desks or with respect to any property provided by Elite. As such, they are subject to search at any time and for any reason, with or without prior notice. Elite also has the right to search packages, containers, or briefcases brought on company property, as well as those brought into company vehicles. Any illegal substances found on company property will be turned over to the appropriate law enforcement agency and may also result in criminal prosecution. As a condition of employment, refusal or failure to cooperate with any aspect of this policy may result in disciplinary action, up to and including, termination.

### **Inclement Weather and Emergency Closings:**

Emergencies, such as severe weather, power failures or national disasters, can disrupt Company operations. In extreme cases, these circumstances may require the closing of the office. In such instances, employees should contact their managers. In general, unless required by law, non-exempt employees will not be paid for time off from scheduled work due to inclement weather or other emergency conditions.

### **Drug-Free and Alcohol-Free Workplace**

Elite is committed to ensuring a safe, healthy, and productive work environment for our employees and for protecting the safety and security of its facilities and employees. As such, Elite has adopted a strict policy of maintaining a workplace free of drugs and alcohol abuse.

Individuals under the influence of drugs, including legally prescribed drugs, and alcohol, while on duty, pose serious safety and health-risks not only to themselves, but also to all those who with whom they come in contact. Therefore, possessing, using, consuming, purchasing, distributing, manufacturing, dispensing or selling alcohol or controlled substances, during your work hours or on the company premises, will result in disciplinary action, up to and including termination. To assure compliance with the company drug-free and alcohol-free workplace policy, Elite reserves the right to require and conduct drug/alcohol testing to the extent permissible by law. Elite may test under the following conditions:

**Pre-employment:** As required by company for all perspective employees who receive a conditional offer of employment.

**For Cause:** Upon reasonable suspicion that the employee is under the influence of alcohol or drugs that could affect or has adversely affected the employees job performance.

**Random:** As authorized by Federal and State law.

This policy also applies to the use of legal and prescribed medications that may impair an employee's ability to work safely and efficiently. Employees may be suspended or separated if the company concludes that you are not able to perform your job safely because of using over the counter or prescribed medication. Please inform your supervisor prior to working over the influence of a prescribed or over the counter medication that may affect your performance.

### **Prohibited Activities**

Elite is responsible for providing a safe and secure workplace and strives to ensure that all individuals associated with the company are treated in a respectful and fair manner. Though it is

not possible to list all forms of behavior that are unacceptable in the workplace, the following are some examples of behavior that would be infractions of Elite Investigations Ltd. rules of conduct. Such behavior may result in disciplinary action up to and including termination of employment. This list is not intended to be exhaustive:

- Theft or inappropriate removal of possession of company property or the property of a fellow employee or client.
- Willful destruction of company property or the property of a fellow employee.
- Working under the influence of alcohol or illegal drugs.
- Possession, distribution, sale, transfer or use of alcohol or illegal drugs in the workplace, while on duty or while operation employer-owned vehicles or equipment.
- Fighting or threatening violence in the workplace of any employee or client.
- Sexual or any other type of harassment
- Using abusive, threatening or obscene language.
- Using intimidation tactics and making threats.
- Sabotaging another person's work
- Making malicious, false and harmful statements about others
- Disclosing private information
- Possession of unauthorized material, such as explosives and firearms in the workplace.
- Falsifying company records or reports, including one's time records or the time records of another employee.
- Failure to follow safety rules or procedures or general neglect of safety concerns.
- Excessive tardiness and absences
- Unauthorized or excessive use of company telephones
- Being away from work area without prior authorization
- Sleeping or neglecting your job duties
- Failure to follow dress standards

#### **Ethics and Corporate Compliance:**

Elite expects all employees to maintain the highest standards of courtesy, professionalism, respect, integrity, honesty and comply with all applicable policy and procedures set forth and in place, to assist the company with maintaining their earned reputation, enabling Elite with building an excellent relationship with clients.

#### **Non-Fraternization Policy:**

Elite desires to avoid misunderstandings, complaints of favoritism, possible claims of sexual harassment and employee morale and dissension problems that potentially result from romantic

and/or sexual relationships (used interchangeable: "romantic relations") between employees. Accordingly, all employees are discouraged from fraternizing or becoming romantically involved with other associates, and can be prohibited from such relationships when, in the opinion of Elite management, their personal relationships may create a potential conflict of interest, cause disruption, create a negative or unprofessional work environment, or present concerns regarding supervision, safety, security or morale.

The terms dating and romantic relationship, as used in this handbook, include, but are not limited to: casual dating, serious dating, casual sexual involvement where the parties have no intention of carrying on a long-term relationship, cohabitation, and any other conduct behavior normally associated with romantic or sexual relationship.

The restrictions on romantic relationships apply regardless of the sexual orientation of the employees involved. Thus, this policy applies equally to opposite-sex, same-sex, and transgender relationships.

The policy applies only to consensual romantic or sexual relationships between employees. Unwanted sexual attention (including, but not limited to, physical contact) and sexually oriented behavior with the purpose or effect of creating an offensive environment are strictly prohibited per Elite's aforementioned policies.

### **Confidentiality**

Elite employees are entrusted with and have access to company equipment, confidential and proprietary information, medical information, payroll information, and confidential client information. Violating that trust will result in immediate termination, as well as possible criminal prosecution. The protection of confidential Company and client information and trade secrets is vital to the interests and the success of the Company. Confidential information is any nonpublic information including, but not limited to, trade secrets involving the Company and/or its clients, suppliers, independent contractors, or employees, business processes and trade secrets. All Company and client information must be held in strict confidence. Confidential information includes, but is not limited to, the following examples:

- Business records
- Company manuals
- Information relating to confidential or proprietary processes and technologies
- Client lists and related information
- Terms of agreements between clients and vendors
- Financial data and financial statements
- Budgets and forecast
- Licenses
- Client information, data and preferences
- Proprietary processes and methods

- Elite business information
- Bids, proposals and business plans
- Software programs and other real property and specifications owned by Elite
- Systems and programs
- Pricing strategy and information
- Trade secrets, marking plans
- Technical writing

Employees are required to sign a nondisclosure agreement as a condition of employment. However, regardless of whether a formal agreement is signed, any employee who discloses trade secrets or confidential and proprietary business information of Elite, without the written permission of an owner of Elite, to anyone other than a person known to be authorized to receive such information, will be subject to disciplinary action up to and including termination, and may also be subject to legal action. Further, each employee has a continuing obligation to safeguard all confidential proprietary information even after his or her employment with Elite ends, whether through retirement, resignation, termination or otherwise.

As the Company expects its confidential information to be respected, it is the policy of the Company to respect the confidential information of others. Any employee, who possesses confidential information from a former employer, or relating to clients of a former employer, must keep that information confidential and not disclose or use that information for any purpose. Under no circumstances are confidential materials, documents or other information to be removed from Elite's premises, without prior written authorization from the president or executive vice president of the company.

### **Conflict of Interest**

Employees are obligated to conduct business in the best interest of Elite and its guidelines that prohibit any conflict of interest. A conflict of interest occurs when an employee is in a position to influence a decision that might lead to personal benefit for themselves, a relative, or a friend, as a result of Elite business dealings. Additionally, if a member of an employee's family has a financial or other business interest in a client or a competitor of Elite, that interest could affect the employee's ability to make impartial decisions on behalf of the company.

For the purpose of this policy, a relative is a person who is related by blood, marriage, or whose relationship with the employee is similar to that of a person who is related by blood or marriage. As a result, any employee who becomes aware that Elite is or may be doing business with any such individual or company must alert management.

Employees may not solicit directly or indirectly for the employee relative's benefit, or the benefit of another person, any gift, favor or other gratuity from a person or organization with which Elite does business or who seeks to do business with Elite. Employees cannot accept nor offer any gratuity, gift or favor that might be intended to influence a business decision or could create the appearance of impropriety.

Business transactions should be handled with professionalism and business sense and should not involve or result in unusual gains, bribes, bonuses, special fringe benefits, unusual price breaks, or other windfalls designed to personally benefit Elite employees, their family and friends, the employees of other businesses, or other contacts.

### **Outside Employment**

Elite employees may hold non-competitive jobs outside of the company, during nonworking hours, provided that an outside job does not interfere with an employee's ability to satisfactorily perform the duties of his/her assignment

## **Employment Relationship**

### **Orientation**

All Security personnel hired will be required to attend a company orientation where you will be educated regarding company policy and procedures, post orders and company rules.

### **Security Guard License and other Licenses required to work**

All security personnel employed by Elite Investigations Ltd., are required to have a VALID State Issued Security Guard License as a condition of employment. Certain posts require other specific licenses (ex. F02; CPR; F80 etc.) Any security personnel who fail to maintain a current State Security Guard License or any other license required for the post the employee currently works for, shall be removed from the work schedule and subject to disciplinary action which may result in the loss of your assignment and or your termination from the company.

If you are removed from the work schedule due to any of your licenses expiring, Elite Investigation is not obligated to return your previously assigned schedule back to you upon the license reactivation, and you will be assigned whatever schedule is available.

### **Smart Phone Requirement**

All employees are required to own a smartphone during their time of employment with Elite Investigations.

### **Employee Classifications**

Understanding the definitions of employment classifications is important to the understanding of benefits eligibility and other employment status issues. These classifications do not guarantee employment for any specified period of time. Rather, the right to terminate the employment relationship "at will" (meaning at any time, for any reason, with or without prior notice) is retained by the Company.

### **Exempt and Non-Exempt Employees:**

For purposes of overtime eligibility, jobs are classified according by certain criteria as "exempt" or "non-exempt" based on their job duties, responsibilities and pay structure.

- a. Non-exempt employees are entitled to overtime pay for regular hours worked over forty (40) in any given workweek under the provisions of the Fair Labor Standards Act (FLSA) and or state or local law. Regular hours worked do not include any non-worked time,

such as meal breaks, holidays, vacation days, sick days, personal days or leaves of absence.

- b. Exempt employees are not entitled to overtime pay under the provisions of the Fair Labor Standards Act (FLSA) and or state or local law.

Each employee will belong to one of the following employment categories:

- a. Full-Time: Employees scheduled for a minimum of 35 hours on average are eligible for health benefit packages, subject to the terms, conditions and limitations of these or any additional benefit program and the Affordable Care Act.
- b. Part-Time: Employees are not considered temporary but are scheduled for less than 35 hours per week. Part-time employees are not eligible for any Elite benefit programs, other than legally mandated 'Earned Sick Leave' (ESL) or other such laws.
- e. Consultants: Hired under special contractual agreements and are not considered employees of Elite and are therefore not entitled to any benefits.

### **Performance Reviews:**

Elite Investigations Ltd. conducts performance reviews annually for HQ staff before the end of the first quarter. Performance reviews is a performance appraisal process that provides a means for discussing, planning and reviewing the performance of each employee. Performance appraisals influence salaries and promotions. The completed evaluations will be retained in the employee's personnel file. Salary increase requests must be supported by a performance appraisal for salary change processing. Managers may not discuss any proposed action with the employee until all written approvals are obtained.

### **Promotions and Employee Development**

It is Elites policy to promote from within our company whenever the most qualified candidate is available. All promotions are made on an equal opportunity basis and according to the results of the annual performance review and the analysis of the required skills required for the position. All employees are encouraged to apply.

### **Work Hours and Work Schedules:**

(Field Employees; Security Guards; Site Supervisors) Employee work schedules, breaks and work sites are set upon hire, but may be modified based on Elite operational needs with notice to the employee. Security operations employees are required to work at least one day of the weekend (e.g., Saturday or Sunday), or may work full weekends. Employees will be required to work evenings, nights, holidays, extended shifts and overtime, consistent with their work schedules, availability of work or open schedules. Employees will be expected to comply with revisions to their work schedules.

For HQ Office Staff, regular work week is from Monday to Friday from 9:00 a.m. to 5:00 p.m., with a one-hour lunch break. Individual work schedules may vary based on departmental needs.

Salaried employees are required to work a minimum of 40 hrs. per week but are subject to vary due to workflow and the needs of the company.

**Timekeeping:**

Elite will use Vision to track all non-salaried employee time worked, however each employee is encouraged to keep track of his or her time. Employees are not allowed to clock in for any other employee other than themselves. All non-salaried employees must use the app Track Force to clock in and clock out.

**Attendance and Punctuality:**

Regular attendance and punctuality are expected from all Elite employees. Excessive absenteeism and lateness, or patterns of absenteeism and lateness, including abuse of Elite's paid-time-off and leave policies, will result in disciplinary action.

- a. Security officers are required to call or check in with their Operations Manager at least 4 hours before their scheduled shift if they will not be able to report for duty.
- b. Staff members are required to call, email or text their supervisor at least 4 hours before their scheduled tour if they are not able to report for duty.

**Payday / Pay-week:**

Elite Investigations pay week is from Sunday – Saturday. Earned wages are paid weekly on Fridays by check. In the event that a regularly scheduled payday falls on a holiday, employees will receive pay on the last business day prior to the holiday. Security Officers will be paid on a schedule to be determined by Human Resources with the approval of the Senior Vice President, usually on Fridays at 3PM (unless Friday is a holiday then pay day would be the previous business day.)

**Issuance of Checks:**

Checks will be mailed out to the employee's home address unless specified otherwise. Elite also offers check distribution sites in which employees may fill out the form and choose one of the sites. Checks are available for pick up at the distribution sites on Fridays at 12:00 p.m.

**Payroll Taxes and Other Withholdings**

All compensation paid to employees is subject to federal, state and local income tax withholdings and to required Social Security and Medicare contributions based on the exemption information completed and supplied by the employee and submitted to the Company. Authorized deductions may also be taken for employee benefits plans. The Company strongly encourages all employees to carefully review all pay stubs or statements and to contact the Controller with any questions in this regard.

**Overtime**

Overtime compensation is paid to non-exempt employees at a rate of one and one-half (1 ½) times the employee's regular rate for actual hours worked in excess of forty (40) hours in a given workweek in accordance with the provision of the FLSA. Employees are not permitted to work overtime without express authorization from a supervisor or manager. Working overtime without prior authorization may subject the employee to disciplinary action.



**Payroll Disputes:**

When paychecks are received, employees are required to inform the Operations Manager “OM” of any discrepancy. All discrepancies brought to the attention of the OM will be investigated thoroughly and adjustments will be made, if deemed necessary on the next payroll check.

In the event that the employee does not receive their mailed check, they are to submit a missing check form to the Accounting Dept. in order to have the lost cancelled and reissued. This form can be found on our website at [www.eliteinvestigation.com](http://www.eliteinvestigation.com)

**Personnel Records:**

Human Resources will maintain all personnel records, which will be kept confidential. Such records will be provided only to those legally authorized under such laws as the Health Insurance Portability and Accountability Act (HIPAA) and other privacy laws.

**Access to Personnel Files:**

The Company maintains personnel files on all employees. Personnel files are maintained by the Human Resource Dept and are considered confidential. The personnel files may include such information as the employee's job application, resume, training records, documentation of performance, documentation of wages and other employment records. The Company maintains files for information regarding employment eligibility verification (Form I-9), and for medical and related benefits information, if any. Personnel files are the property of the Company, and access to the information they contain is restricted. Only management personnel of the Company who have a legitimate reason to review such information will be permitted to do so.

**Retention and Destruction of Employee Files:**

Employee documents and files will be retained in accordance with applicable federal, state and local rules and regulations.

**Personal Data Changes**

Human Resources will change data in the company computer system upon proper notification from employees on appropriate forms or via email. Alternatively certain data changes can be modified via Employee Self Service (ESS). All forms are available on our website [www.eliteinvestigation.com](http://www.eliteinvestigation.com). Employees are personally responsible to notify the Company immediately whenever there is a change in any of the following:

- Address
- Telephone number
- Person to notify in case of emergency
- Legal name
- Marital status (only if the employee elects to make a change to the W-4 form)
- Number of dependents (only if the employee elects to make a change to the W-4 form)
- Insurance beneficiaries

- Military status
- Revocation or material change of status of any license used for employment at Elite
- Health status (as it may affect employment)
- Conviction of any crime
- Citizen status (e.g. material change in status that changes the I-9 certification)

A manager or executive must approve any change made to an employee's status with the company, including promotions, demotions, and termination.

### **Hire Date**

Employees who have worked for Elite Investigations at least 5 years and have separated from the company and returned within one year of the separation date, will be able to keep their original hire date.

### **Professional Appearance / Dress Code**

All employees are always expected to be neatly groomed and to maintain proper hygiene.

Security Officers/ Site Supervisors are to wear the uniform provided to them. Belts (large or fancy belt buckles are not permitted) and shoes must be black. Uniforms are to be maintained and worn in clean and unwrinkled conditions and shirts are always to be tucked in.

Elite always requires management and office personnel to wear proper business casual attire in any company office and when on duty. This is a general overview of appropriate business casual attire. Items that are not appropriate for the office are listed, too. Neither list is all-inclusive, and both are open to change. The lists tell you what is generally acceptable as business casual attire and what is generally not acceptable as business casual attire.

No dress code can cover all contingencies so employees must exert a certain amount of judgment in their choice of clothing to wear to work. If you experience uncertainty about acceptable, professional business casual attire for work, please ask your supervisor or your Human Resources staff.

### **Slacks, Pants, and Suit Pants**

Slacks that are similar to Dockers and other makers of cotton or synthetic material pants, wool pants, flannel pants, dressy capris, and nice looking dress synthetic pants are acceptable. Inappropriate slacks or pants include jeans, sweatpants, exercise pants, shorts, bib overalls, work out leggings, and any spandex or other form-fitting pants such as people wear for biking.

### **Skirts, Dresses, and Skirted Suits**

Casual dresses and skirts, and skirts that are split at or below the knee are acceptable. Dress and skirt length should be at a length at which you can sit comfortably in public. Short, tight skirts that ride halfway up the thigh are inappropriate for work. Mini-skirts, skorts, sun dresses, beach dresses, and spaghetti-strap dresses are inappropriate for the office.

## **Shirts, Tops, Blouses, and Jackets**

Casual shirts, dress shirts, sweaters, tops, golf-type shirts, and turtlenecks are acceptable attire for work. Most suit jackets or sport jackets are also acceptable attire for the office if they violate none of the listed guidelines. Inappropriate attire for work includes tank tops; midriff tops; shirts with potentially offensive words, terms, logos, pictures, cartoons, or slogans; halter-tops; tops with bare shoulders; sweatshirts, and t-shirts unless worn under another blouse, shirt, jacket, or dress.

## **Shoes and Footwear**

Loafers, flats, dress heels, and leather deck-type shoes are acceptable for work. Flashy athletic shoes, thongs, flip-flops, slippers, and any shoe with an open toe are not acceptable in the office. Security Guard Officers are to use all black shoes.

## **Hats and Head Covering**

Hats are not appropriate in the office. Head Covers that are required for religious purposes or to honor cultural tradition are allowed.

If clothing fails to meet these standards, as determined by the employee's supervisor and Human Resources staff, the employee will be asked not to wear the inappropriate item to work again. If the problem persists, the employee may be sent home to change clothes and will receive a [verbal warning](#) for the first offense. All other policies about personal time use will apply. Progressive disciplinary action will be applied if dress code violations continue.

The Company dress code does not include maintenance staff, and any additional exceptions to this policy must be approved by an executive. Department heads are to notify an executive for approval of an exemption from this policy on days when that department's employees are performing tasks requiring more casual dress. Employees who report to work inappropriately dressed will not be permitted to work and may be disciplined.

## **Face Covering Guidelines for Mitigation of COVID-19**

Elite Investigations, LTD, employees shall possess and wear a face covering whenever they are indoors while on duty and employees shall also possess and wear a face covering whenever they are outdoors and within six feet of any other person while on duty. If you do not have a face covering one will be provided to you at your work location or by contacting Elite Investigations, LTD, OCC (212-629-3131) or requesting that one be provided to you by a Supervisor free of charge.

The following applies to all face coverings worn by Elite Investigations, LTD employees while on/off duty while onsite at a work location, at all Elite Investigations, LTD offices and while in a company vehicle with other occupants:

- Face coverings must always cover both the mouth and nose
- Face coverings must be a solid color
- Face coverings may not have any printed wording or logos

- Face coverings with the Elite logo, the words “SECURITY” or with client logo for face coverings provided to an employee by the client are permitted

### **Lactation policy**

Elite Investigations Ltd. will accommodate employees who desire to express breast milk during work hours by providing a reasonable amount of break time to be used for this purpose. If an employee requires additional other than the scheduled rest or meal periods, Elite Investigations Ltd. will make every effort to provide additional unpaid time off for this purpose.

### **COMPUTERS, TELEPHONES AND ELECTRONIC DEVICES, SOCIAL MEDIA AND PROTECTION OF INTELLECTUAL ASSETS**

The Company provides employees with access to computers, telephones, voicemail, e-mail and Internet access to help them do their jobs. These data and telecommunications devices are provided to further the business interests of the Company. The Company may provide personal passwords to employees to access voicemail and e-mail, however, these communications remain Company property and the Company reserves the right to monitor and/or tape record all telephone and e-mail communications, including voicemail and e-mail. In addition, Internet usage may be monitored and audited by management for inappropriate activity, at the Company's discretion. For security purposes, it is very important that employees never share passwords or other computer-related data with any non-employees.

#### **Use of Company Equipment (Telephones, Cellular Phones, E-Mail, Electronic Devices)**

Employees will notify a supervisor or manager if any equipment, machines, tools or vehicles appear to be damaged, defective or in need have repair. Prompt reporting of damages, defects and the need for repairs could prevent damage to equipment and possible injury to employees or others. Supervisors and managers may answer questions about an employee's responsibility for maintenance and care of equipment or vehicles used on the job. The improper, careless, negligent, destructive or unsafe use or operation of equipment or vehicles, as well as excessive or avoidable traffic and parking violations, may result in disciplinary action, up to and including termination.

#### **Company Telephones**

Office telephones are provided for Company business purposes only. In general, office telephones should not be used for personal reasons, except in an emergency. Employees should use their own mobile telephones for personal calls, subject to the protocols below.

#### **E-Mail**

The Company provides most employees with e-mail addresses and access to an e-mail system for business purposes only. Personal use of the Company's e-mail system is strictly prohibited.

E-mail must be appropriate in content and must be used in a manner consistent with Company policy, including restrictions set forth in this Guide. Employees must not engage in any e-mail communications that contains defamatory, sexually explicit, offensive or harassing messages, or messages that disclose sensitive company information or employee personal information.

Excessive or inappropriate use of computers, e-mail, Internet access, telephones, mobile phones and/or other electronic devices may result in disciplinary action up to and including termination and possible legal action.

All of Elites field staff which includes but is not limited to Security Guard Officers, Lead Guards, store detectives etc. are required to have an active working email that is checked daily as Elite Investigations uses this method as a form of communication between the company and employees.

### **Personal Mobile Phones and Other Electronic Devices**

On occasion, it may become necessary for an employee to make or receive personal calls or other communications during the workday using electronic devices such as cell phones. However, the Company expects that employees will use these devices on a limited basis and will not use these devices in a way that is intrusive, excessive or disruptive to the Company's business operations or other employees.

At all times ringers on phones and electronic devices must be turned off and on a silent mode. Also, the use of cellular phones is not permitted in common work areas. Cellular phones, when used, must be used outside of the work area in a manner not disruptive or distracting to others.

### **Computer, Internet, and Electronic Communication System Usage**

The Company provides employees with access to computers and to the Internet through Company computers for business purposes only. Accordingly, employees can have no expectation of privacy in any communications, information or data contained in or transmitted by Company computers.

Employees must use the Internet in a professional, ethical and lawful manner at all times. Employees must not access the Internet or e-mail to use, upload, post, mail, display, or otherwise transmit in any manner, any communication that, among other inappropriate uses:

- Is hateful, harassing, threatening, defamatory, pornographic, profane or sexually explicit
- Solicits or conducts any personal commercial activity, or is for personal gain or profit  
Involves personal web sites, dating web sites, or any Internet bulletin boards for personal ads or solicitations
- May be offensive to any person based on race, ethnicity, religion, national origin, sex, sexual orientation, age, physical or mental illness or disability, or any other characteristics that may be protected by applicable law
- Describes or refers to Company employees, clients or competitors in an adverse or negative light
- Discloses to unauthorized persons confidential or proprietary Company or client information.
- Constitutes or furthers any criminal activity
- Contains a virus, Trojan Horse, logic bomb, worm or other harmful component or malware

- Constitutes a chain letter or an e-mail list, or any auto-response program or service
- Makes statements on behalf of the Company without express authorization from management.

### **Social Media Guidelines**

For the purposes of this Guide, social media is defined as any form of online publication or presence that allows interactive communication, including, but not limited to, social networks, blogs, Internet websites, Internet forums, and wikis. Examples of social media include, but are not limited to, Facebook, Twitter, YouTube, Google+, and Instagram.

All Elite employees are personally responsible for the content they publish on social media. Keep in mind that everything you publish will be available online for a very long time. Elite's Social Media Guidelines are as follows:

1. Identify yourself. Make it clear that you are speaking in your individual capacity and not on behalf of Elite. If you publish content containing anything related to your employment use a disclaimer such as: "The posting on this site are my own and do not represent my employer's positions, strategies or opinions."
2. Do not provide information with respect to Elite's operations. All Elite employees are strictly prohibited from providing the following information:
  - a. The location of your post;
  - b. The client to whom Elite is providing services; and
  - c. Pictures taken while working at your post.
3. Respect your audience. Do not insult, use obscene language or behave in any way that would be inconsistent with the code of conduct discussed within this Guide.

### **Use of Company Vehicles**

The Elite Investigations Ltd. company vehicle policy gives employees guidelines for obtaining, qualifying for, and using a company vehicle. A "company vehicle" is any Elite owned vehicle that is assigned to employees. This policy applies to all employees who are authorized to use a company vehicle and applies during and outside of working hours.

#### **Personal use, passengers & authorized drivers of company vehicles.**

Company vehicles are to be driven by *authorized employees only*. Passengers should *only* be individuals who need to ride in the company vehicle in order to conduct Elite business. Elite Investigations Ltd. does not allow personal use of company vehicles. Company vehicles are by no means to be used for personal use without *prior* authorization, i.e. on weekends to go run personal errands; vacations etc.

#### **Registration/Insurance**

Employee is responsible for making sure that inspection, registration and insurance is up to date on their vehicle, as well as patrol vehicles of sites they are managing. This means you shall have current registration and inspection sticker placed on windshield and have the current

insurance card inside the vehicle at all times. (If insurance card has expired and you need updated card, please contact Operations Administrative Assistant to receive one).

### **Vehicle Maintenance and Repairs**

Proper vehicle maintenance is important to ensure safe, road worthy vehicles and will help avoid costly and unexpected breakdowns. Routine inspections are important some items to check are breaks, lights, tires, wipers, tire pressure, fluid levels, gas etc. The company vehicles must be cleaned regularly (interior & exterior) to help maintain a good appearance for you and the company. Oil changes are required every 5,000 miles. Please note employees must get pre-approval from the General Manager for any vehicle maintenance needs. When a company vehicle needs to undergo any car repair, the vehicle is to go to a certified vendor in your area. Please contact Operations Administrative Assistant for a copy of the list.

### **Gas Card/ E-Zpass**

Gas cards and E-Z passes are ONLY to be used for company vehicles not for any personal use. Any employee discovered to be violating this policy will have these privileges terminated along with disciplinary actions. Please note gas profiles are assigned per position ex; Managers, Field Supervisors, & Security Guards with patrol vehicles. The gas Elite provides is regular unleaded, under no circumstances are you to fill up company/personal vehicles with Super unleaded gas, this is not permitted or covered by company. If an employee is found to have used a company gas card for anything other than regular unleaded, the employee will be responsible for the full reimbursement of the charge.

### **Driver Safety Rules**

Obey all State and Local laws.

All driving expenses are to be documented.

Report any damage or problems to your assigned vehicle immediately.

Report changes to your driver privileges, such as driver's license suspension, immediately.

*\*\*\*Please be aware that Elite will obtain DMV records every 6 months. It is the employee's responsibility to inform the company of any changes immediately. If an employee's license is revoked or suspended the employee shall immediately discontinue operation of company vehicle. If at any time Elite obtains any DMV records with information that has not been provided by the employee, this will be considered in violation of this policy and will be subject to disciplinary action up to and including termination. \*\**

Employees are to shut off vehicle engine, ignition keys removed and lock company vehicle at whenever the vehicle is left unattended.

All drivers and passengers must wear seat belts, even if airbags are available.

Bring vehicle to scheduled maintenance appointments.

The use of a company vehicle under the influence of intoxicants or drugs, fatigued, or on any medication that can impair your driving ability is forbidden.

Smoking is not allowed in any company vehicles.

Eating in company vehicles is not allowed.

Do not lend a company vehicle.

Cellphone use is strictly prohibited while driving, if cellphone usage is necessary while driving it must be kept to a minimum and be used in a "hand free" mode via headset or speaker.

No unauthorized drivers / passengers are allowed in the company vehicles.

### **Reporting requirements for accidents and car damages**

All accidents in company vehicles, regardless of the severity must be reported to the police and their immediate supervisor. Accidents are to be reported immediately (from the scene, during the same day).

All employees are also required to complete and submit an Elite Accident Report within 24hrs. of a traffic accident or any other car damages. Elite Accident Reports are available in every company vehicle and can also be found on our website. Pertinent information includes license numbers of other drivers, insurance company names and policy numbers of other vehicle involved., make model and year of other vehicles, date and time and location of the accident, description of the weather and road conditions if it had a role in accident.

The employee must submit the report to his/her immediate supervisor or the General Manager. The Elite Accident Report must be filled out completely as well as providing Elite with all other supporting documentation available i.e. pictures of damages. If Elite finds out that an accident or any car damage has occurred, and no report has been submitted within the first 24hrs., the employee will be subject to disciplinary action up to and including termination.

### **Negligent use of company Vehicles**

Any employee that is found to have caused any accident and or damages on company vehicle due to improper, careless, negligent, destructive or unsafe will be subject to disciplinary actions up to and including termination.

### **Maintenance books / logbooks**

All company vehicles will be equipped with a maintenance book. The maintenance book is to be used to notate car services completed. Cars are always to be signed in and out, the logbook will be kept in the dispatch area in HQ.

### **Traffic tickets/violations**

Elite will not be responsible for any tickets in which the employee failed to obey parking and traffic laws. Employees who are routinely checking on sites can park in parking garages and submit a receipt to accounting along with expense sheet. Any tickets or violations that the company receives will be investigated and the employee who was using the vehicle at the time will be made responsible for the charges.

### **Uber /Lyft / SpotHero**

A car can be requested through the Operation's Administrative Assistant or the Executive Assistant to visit sites, drop off time sheets, or checks. An email needs to be sent to General



Manager for approval, after approval is given an email will be sent to Nancy with address of pick up & drop off, as well as site(s) they are visiting and the number of passengers.

The use o

## **Monitoring and Violations**

To the extent that the Company provides an employee with access to Company telephones, computers, e-mail and/or the Internet through Company computers, these items are provided for business purposes only. Accordingly, employees can have no expectation of privacy in any communications, information or data stored in or transmitted by Company computers, telephones or e-mail. Elite reserves the right at all times to access, retrieve, examine, review, copy, save, transfer, disclose or delete any stored or recorded messages, files, data, or information with or without notice to the employee, and with or without obtaining the consent of the employee. All these Company electronic devices are subject to monitoring and/or tape recording.

## **Work Environment**

### **Security of Premises**

No employee may use any other employee's computer login names, access codes, or passwords. Keys or key cards used to access Company properties may not be copied or shared with others. Only those staff members requiring keys will be issued copies. The loss of any means of access must be reported immediately to the IT Manager or an executive.

The front door to the company's headquarters must be locked at all times, and all visitors must be announced. Restricted areas, including the computer room and the equipment room, are off limits to unauthorized personnel and will be kept secure at all times.

### **Emergency Procedures – Headquarters**

In case of any emergency employees should remain calm and notify a supervisor or manager, and immediately call 911. In case of fire, employees should immediately notify OCC and leave the building. Also, employees should be aware of the location of fire exits and fire extinguishers at all times.

### **Responsibility for Personal Belongings**

Employees are responsible for their personal property and should notify Human Resources or a manager if anything is missing or damaged.

### **Visitors in the Workplace**

All visitors will be announced to the Executive Secretary and treated courteously. Visitors will remain in the waiting area by OCC until admitted by the staff member being visited.

### **No Solicitation and No Distribution Rule**

Solicitation of employees for any cause, no matter how worthy the cause may seem to one employee, may be offensive to others and could be distracting. Accordingly, solicitation for charitable causes, civic or religious groups, outside businesses, political candidates or other organizations during working hours is expressly prohibited on Company property. Solicitation

and distribution of literature by non-employees on Company property is also strictly prohibited at all times.

Solicitation includes, but is not limited to, asking employees for funds or contributions, offering goods for sale (whether for charitable or for commercial purposes), soliciting support for a political candidate, or otherwise requesting support or commitment with respect to causes, groups, or interests. Violation of this solicitation policy by any employee may result in disciplinary action up to and including termination.

### **Prohibited Conduct**

1. Employees are prohibited from asking, receiving or soliciting additional monetary compensation of any nature from a client other than contractual requirements.
2. Employees are prohibited from asking, receiving or soliciting any client for services, a loan or other financial assistance.
3. Employees are prohibited from asking, receiving or soliciting any discounted or free compensation of any nature from any client or vendor.
4. Employees are prohibited from fraternizing with clients' employees.
5. Employees are prohibited from engaging in card games or other games of chance (gambling) at any client location or on Company property.
6. Employees are prohibited from competing with the Company.
7. Employees are prohibited from viewing, copying, removing or accessing any confidential employment information or any employee, except as authorized by a Company manager or executive.
8. Employees are prohibited from giving confidential employment information or internal business-related information of to anyone unless they authorized by a Company executive.

### **Corrective Action / Progressive Discipline**

It is the policy of Elite that any conduct that interferes with or adversely affects company business or the employment environment, and/or otherwise reflects poorly upon the company, are grounds for disciplinary action, ranging from a verbal warning to termination. Per this handbook, all employment with Elite is 'at-will', meaning that either the employee or employer have the right to terminate the employment relationship at any time, with or without cause or prior notice.

Elite also retains the right to either implement progressive discipline or to terminate an employee without benefit of progressive discipline, at its sole discretion, based upon the seriousness of the disciplinary act committed. Factors that may be considered in ascertaining appropriate discipline include, but are not limited to:

- Seriousness of conduct
- Employee's prior record
- Effect of conduct on clients, other employees and/or the company

- Relevant circumstances

## **Employee Benefits**

### **Paid Safe and Sick Leave**

- a. All employees begin to accrue safe/sick time on their first day of work and are eligible to begin using safe/sick time 120 calendar days after the start of their employment.
- b. Employees accrue one hour of safe/sick time for every 30 hours in most jurisdictions (although this varies per state) and employees may use safe/sick time as it is accrued. However, the employer is only mandated to pay a maximum of 56 hours of safe/sick time per calendar year.
- c. Employees may use safe/sick time for all authorized uses under the Law and Rules, including but not limited to; (1) absence from work when the Employee or the Employee's family member has been the victim of a family offense matter, sexual offense, stalking, or human trafficking, to obtain services for relief from a family offense matter, sexual offense, stalking, or human trafficking, to participate in safety planning, relocate, or take other actions to increase the safety of the employee or employee's family member from future family offense, sexual offenses, stalking, or human trafficking matters, and (2) absence from work for the care or treatment of a mental or physical illness, injury, health condition, or for preventative medical care for an employee or an employee's family member;
- d. Family members of Employee's include: children (biological, adopted, or foster children, legal ward, children of an Employee standing in loco parentis) grandchildren, spouses, domestic partners, parents, siblings (include half, adopted, or step siblings), any other individual related to an Employee, and any other person with whom an employee has a close relationship that is like a family relationship;
- e. Any minimum increments required for use of safe/ sick time shall not exceed four (4) hours for each initial increment and thirty (30) minutes for any subsequent increments, provided such minimum increments are reasonable under the circumstances;
- f. Employees will be paid the same rate for safe/sick time as they would have earned had they worked those hours;
- g. Employees will be paid for safe/sick time used no later than the payday for the next regular payroll period beginning after the safe/sick time was used by the employee;
- h. Any requirement that an employee provide documentation from a licensed health care provider in order to be paid for sick time used (1) is limited to circumstances in which the employee uses sick time on more than three consecutive work days, (2) does not require the employee to disclose the nature of the illness, injury, or health condition, (3) only requires documentation from one licensed health care provider, and (4) allows an employee at least seven days from the date the employee returns to work to such documentation;
- i. Any requirement that an Employee provide documentation in order to be paid for safe time used (1) is limited to circumstances in which the employee uses safe time on more than three consecutive work days, (2) does not require the employee to disclose the

details of the family offense matter, sexual offense stalking, or human trafficking, and (3) requires documentation to be accepted if it is in the form of: documentation signed by an employee, agent, or volunteer of a victim services organization ; an attorney; a member of the clergy; or a medical or other professional service provider from whom the employee or that Employee's family member has sought assistance in addressing family offense matters, sex offenses, stalking, or human trafficking and their effects; a police or court record; or a notarized letter from the employee explaining the need for such time;

- j. Employees will not be required to provide notice of the need to use safe/sick time sooner than seven days prior to a foreseeable need to use safe/sick time or sooner than is practicable under the circumstances for an unforeseeable need to use safe/sick time;
- k. An employee's use of safe/sick time shall not be conditioned upon searching for or finding a replacement worker.
- l. It is a violation of the Paid Safe and Sick Leave Law for an employer to take any adverse action against an Employee for exercising his or her rights under the Law, and any Employee whose rights may have been violated may contact or file a complaint with the NYC Department of Consumer Affairs.

*\*\*\* Please note: Employees must be on schedule in order to be able to use Earned Safe and Sick Leave. \*\*\**

### **Family and Medical Leave Act**

The Family and Medical Leave Act ("FMLA") provides that all eligible employees of the Company are entitled to take up to twelve (12) workweeks of job-protected unpaid leave during any "rolling" twelve (12) month period for one (1) or more of the following reasons:

- Family Leave
- The birth of an employee's child and in order to care for such child;
- The adoption of a child by an employee or the placement of a foster child into the home of an employee;
- To care for a child, spouse or parent who has a serious health condition;
- Medical Leave
- The employee's own serious health condition.

A "serious health condition" means an illness, injury, impairment or mental condition, which in the case of family leave, requires care for your family member, or, in the case of medical leave a condition that renders an employee unable to perform the essential functions of the job, and which in all situations involves either:

1. A period of incapacity or treatment in connection with, or consequent to, inpatient care (i.e., an overnight stay) in a hospital, hospice, or residential medical care facility;
2. A period of incapacity requiring absence from work and other regular daily activities of more than three (3) calendar days, which also involves continuing treatment by (or under the supervision of) a health care provider; or

3. Continuing treatment by a health care provider for:
  - a. A period of incapacity due to pregnancy or prenatal care;
  - b. A period of incapacity or treatment for such incapacity due to a chronic serious health condition;
  - c. A period of incapacity which is permanent or long-term due to a condition for which treatment may not be effective; or
  - d. A period of absence to receive multiple treatments by a health care provider either for restorative surgery after an accident or for a condition that would likely result in a period of incapacity of more than three (3) consecutive calendar days.

Although medical leave is unpaid, an employee may be eligible to receive certain disability or workers' compensation benefits during the medical leave of absence. However, even though an employee may qualify for these benefits, the employee is still required to follow the procedures under this policy in order to be on an approved leave of absence for medical reasons.

**Eligibility :** All Elite employees are eligible for FMLA leave if employed by the Company for at least twelve (12) months (not necessarily consecutively) and have completed twelve hundred and fifty (1250) hours of service during the twelve (12) month period immediately preceding the commencement of leave.

### **Holidays**

Elite Investigations provides the following holidays to all eligible employees:

New Year's Day	Memorial Day	Independence Day
Labor Day	Thanksgiving Day	Christmas Day

Nonexempt employees working on a designated holiday will be paid for the holiday at Overtime rate.

### **Family Leave Insurance**

Family Leave Insurance is available in certain jurisdictions, cash benefits may be payable for up to ten (10) weeks to bond with a newborn or newly adopted child or to provide care for a seriously ill family member. If this is necessary, please contact the HR department AT 212-629-3131 EXT. 501 for more details of what is available in your state.

### **Personal Leave of Absence (Unpaid)**

Employees wishing to take an unpaid leave of absence for reasons other than medical necessity, military duty or the mandates of the Family Medical Leave Act, from work for a period of longer than 1 week:

- (1) may do so by completing the proper form (Unpaid Leave of Absence Request Form) and have it approved by the employee's manager and submitted to HR Dept.

Failure to provide written documentation of any unpaid leave period will result in the commencement of suspension and termination protocols for job abandonment at minimum.

If the employee is granted an unpaid leave of absence and determines that the unpaid leave can terminate sooner than the date scheduled, the employee must notify the company in writing and must immediately confer with their manager or report to the corporate office before being placed back on any schedule. The employee will submit a revised unpaid leave of absence request documenting the change in their return date. Employees returning from an unpaid leave will be placed at the next available schedule as there is no guarantee that they will be assigned back to their prior scheduled workdays, location or work hours per company policy.

If an employee does not return within the time specified in the written documentation which commenced the leave, he or she will automatically separate from the company and all benefits will cease including medical, life insurance, earned leave and any seniority and longevity. The employee may re-apply as a re-hire and if hired will be processed as a new employee with a new hire date with any pay rate or benefits consistent with that of what a new hire receives.

Failure to provide written documentation of any unpaid leave period will result in the job abandonment. Longevity regular work hours will be affected by any unpaid leave and will be a determining factor in the accrual of any future leave benefits provided to full time employees per the minimum regular work hour policies of the company.

Employees who are under investigation for violation of company policy, poor performance or criminal acts under investigation or in any judicial proceeding, convictions of a crime, or any incarceration are not eligible for this benefit or any other leave benefits.

The granting of any unpaid leave that is not required under applicable state or federal law is wholly within the Company's discretion.

### **Jury Duty Leave**

Employees called for jury duty should notify both their immediate supervisor and Operations Manager. The employee should then submit their appearance notice to Human Resources immediately for appropriate compensation (\$40).

### **Military Leave (USERRA)**

Elite complies with all New York State and federal laws regarding leave of absence for military service, including the Uniformed Services Employment and Re-employment Act ("USERRA"). Employees with questions regarding this policy should contact Human Resources.

### **Short-Term Disability Benefits**

Elite provides short-term disability insurance for employees in accordance with, and where mandated by, state law. In some cases, there may be a waiting period before eligibility begins. Employees on maternity leave may be entitled to benefits under this plan. Employees with questions regarding eligibility should direct their inquiries to Human Resources.

An employee claiming disability benefits must complete all appropriate documentation, including a doctor's certificate, stating the nature of the disability and expected date of ability to resume work. These forms are available from Human Resources.

### **Workers' Compensation Benefits**

The Company maintains Workers' Compensation insurance consistent with state law. This insurance covers only job-related illness or injury. Subject to applicable legal requirements, workers' compensation insurance provides benefits after a short waiting period or sooner if the employee is hospitalized. Employees who sustain work-related injuries or illnesses should inform a manager or executive immediately. Human Resources can provide the appropriate forms.

### **Unemployment Insurance**

Employees separated from their jobs, under certain conditions, may be eligible for unemployment insurance benefits. The amount the employee receives, if any, will be based upon earnings during employment. Unemployment benefits are administered by the state Department of Labor.

### **COBRA- Continuation of Medical Coverage**

Under certain circumstances, the Consolidated Budget Reconciliation Act (COBRA) provides covered employees and their qualified beneficiaries with rights to continued health insurance coverage under the employer's health plan when a "qualifying event" event occurs that would otherwise result in the loss of coverage. Qualifying events might include resignation, discharge, transfer to a part-time position not eligible for benefits, a leave of absence, death of the insured, divorce or legal separation, or a dependent child who no longer meets eligibility requirements.

Employees or other qualified beneficiaries must notify Human Resources of a divorce, legal separation or loss of dependent status. After a qualifying event, employees or designated beneficiaries must elect coverage within sixty (60) days of the date of the qualifying event, or benefits might be lost. Under continuation coverage, the employee and/or the beneficiaries pay the full cost of coverage, and, potentially, an administrative fee, as provided under applicable law. If continuation coverage is not chosen, the group medical insurance coverage will terminate.

### **Time Off for Voting**

Elite Investigation Ltd. recognizes that voting is a right and privilege of being a citizen of the United States and encourages employees to exercise their right to vote. In almost all cases, you will have sufficient time outside working hours to vote. If for any reason you think this won't be the case, contact your supervisor to discuss the scheduling accommodations.

### **Arbitration of Disputes**

Although Elite Investigations hopes that employment disputes with its employees will not occur, Elite Investigations believes that when these disputes do arise, it is in the mutual interest of all concerned to handle them promptly and with a minimum of disturbance to the operations of Elite Investigations' businesses and the lives of its employees.

Accordingly, to provide for more expeditious resolution of certain employment-related disputes that may arise between Elite Investigations Ltd. and its employees, Elite Investigations has instituted a mandatory mediation and arbitration procedure (the Elite Investigations Mediation and Arbitration Procedure) for all employees. Under the Procedure, certain disputes that may arise from your employment with Elite Investigations or the separation of your employment must

(after appropriate attempts to resolve your dispute internally through Elite Investigations management channels) be submitted for resolution by non-binding mediation and, if necessary, mandatory arbitration.

All employment disputes shall be adjudicated before the American Arbitration Association ("AAA"), before a single arbitrator, in a AAA office located in the City, County and State of New York, in accordance with the Commercial Rules of the AAA.

A demand for arbitration shall be made within a reasonable time after the claim, dispute or other matter in question has arisen. In no event shall the demand for arbitration be made after the date when the institution of legal or equitable proceedings based on such claim, dispute or other matter in question would be barred by the applicable statute of limitations. The demand for arbitration shall be in writing with the other party to the Agreement and with the AAA.

No arbitration arising out of or relating to this Agreement shall include, by consolidation or joinder or in any other specific manner, an additional person or entity not a party to this Agreement, except by written consent containing a specific reference to this Agreement and signed by the Parties hereto. The foregoing agreement to arbitrate and other agreements to arbitrate with an additional person or entity duly consented to by Parties to this Agreement shall be specifically enforceable in accordance with applicable law in any court having jurisdiction thereof.

The award rendered by the arbitrator or arbitrators shall be final, and judgment may be entered upon it in accordance with applicable law in any court having jurisdiction thereof.

Notwithstanding the above, the parties may attempt to resolve claims through non-binding mediation prior to the formal institution of the arbitration process set forth herein.

## **Leaving Employment**

### **Separation of Employment**

Managers and supervisors may recommend for any employee to be separated from the company. Such recommendations must be in writing on the appropriate form, with a full written explanation of all pertinent facts attached.

### **Resignations**

Although Elite Investigations Ltd. hopes that employment with the company will be a mutually rewarding experience, it is understood that varying circumstances do cause employees to voluntarily resign employment. Should this time come, employees are asked to notify HR in writing and provide two weeks' notice to facilitate a smooth transition out of the organization.

Employees who fail to report to work for three consecutive days without properly communicating to their supervisor, manager or HR the reasons for their absence will be viewed as voluntarily resigning their employment as of the third day.

### **Final Paychecks**

To the extent permitted by law, final paychecks will be payable on the next regular pay date subsequent to termination and will be mailed to the employee's home address on file or deposited in the employee's account. It is the employee's obligation to carefully review the final paycheck to ensure that it is complete and accurate. The company reserves the right to make



deductions from the final wages to recover any and all unsatisfied expenses related to their employment.

### **Exit Interviews**

The Company may schedule an exit interview for a departing employee at the time of termination. The exit interview affords an opportunity to discuss such issues as employee benefits, conversion of privileges, repayment of outstanding debts to the Company, if any, and return of Company property. Suggestions, complaints and questions and also be voiced at that time. This is a voluntary process.

### **Requests for Employment Verification and Reference Checks**

Employees may request references and employment verification letters, and if granted the Company will provide such and will include dates of employment, job title and compensation verification, provided the request is in writing and accompanied by a written, signed authorization from the former employee. All requests for references and compensation verifications must be directed to Human Resources.