



**TOWNE<sup>®</sup>**  
**PARK**

# **ASSOCIATE HANDBOOK**

**Revised October 2013**

Responsible Owner: Vice President of Administration and Compliance  
Date of Last Revision: 10/01/2013

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## Welcome to Team Towne Park!

On behalf of your colleagues, I welcome you to Towne Park and wish you every success here. Whether you have just joined our staff or have been with us for a while, we are confident that you will find our company a dynamic and rewarding place to work and we look forward to a productive and mutually beneficial relationship.

We consider our associates (our employees) be Towne Park's most valuable resource. We believe that each of you contributes directly to our growth and success, and we hope you will take pride in being a member of Team Towne Park!

Associates should familiarize themselves with the contents of the Associate Handbook as soon as possible. This Handbook was developed to describe some of the expectations of our associates and to outline the practices, policies, programs, and benefits available to eligible associates.

We hope your experience at Towne Park will be challenging, enjoyable, and rewarding. Again, welcome!

Sincerely,

A handwritten signature in black ink that reads "Jerry B. Smith". The signature is written in a cursive style with a large, stylized "J" and "S".

**Towne Park Care Line**  
**(866) 441-4313 or email [careline@townepark.com](mailto:careline@townepark.com)**

Towne Park is committed to our associates! During your employment at Towne Park, most of your questions and concerns can quickly be answered by the management team at your location. If you need further assistance, we encourage you to call the toll-free Towne Park Care. It provides you with a secure place to turn for answers to questions and issues that are important to you. We encourage you to call and leave a brief message describing your issue or concern, and information allowing us to contact you.

*Refer to Section 206 of the Associate Handbook for more details about the Towne Park Care Line.*

## Overview

Welcome to your Towne Park career! We are an exciting, innovative, successful, high growth company long considered to be the premier provider of valet parking, parking management and hospitality staffing services. Our associates across the nation are *Driven to Serve*<sup>®</sup> to make a difference in the lives of the customers and patients we encounter every moment of every day. We're proud to have you on the team and want to offer a learning environment where you can reach your fullest potential.

Towne Park was formed in 1986 by Founder and CEO Jerry South to provide superior parking-related services in the Baltimore, Washington DC and Annapolis areas. Our first client in 1988 was the Radisson Hotel in Annapolis (now the Loews Annapolis) where Jerry parked vehicles and ran the operation. From this first successful location, we have grown to more than 7,000 associates serving over 425 clients including hotels, healthcare facilities and casinos in over 40 markets nationwide.



Our company is profitable and grows when we put the needs of our associates and customers above all else. These guiding values are reflected in our Credo and our business fundamentals encompassed in our business model. It's deceptively simple! Hire the most talented people, teach them well and they will deliver world class service, leading to happy customers, growth and profitability. We truly believe that by starting with *the very best people*, anything is possible!

### **The Towne Park Credo**

*The Words We Live By*

We will become the world leader in valet parking and parking management services by deploying talent and operational expertise in hospitality, healthcare and other specialized markets.

#### **The Very Best People are the Foundation.**

*Winners seek growth and opportunities - not just a job. We maximize potential by fostering a diverse and inclusive workplace.*

#### **Customers are Our Most Important Asset.**

*We anticipate the needs of our customers and exceed their expectations. We turn customers into promoters by consistently delivering value.*

#### **Profitability Secures Our Future.**

*We will always pursue the best opportunities for our company to profit and grow. Company profitability rewards shareholders, associates, and our communities.*

#### **Integrity is Not Negotiable.**

*We operate with integrity and the highest standards of ethics in all we do. We treat all people with fairness, dignity and respect.*

#### **Good Enough Never Is.**

*We embrace positive change and thrive on continuous improvement. We are innovators with expertise valued by our customers and recognized by competitors.*

## INTRODUCTORY STATEMENT

This Handbook has been designed to acquaint you with Towne Park and provide you with information about working conditions, associate benefits, and some of the policies affecting your employment. You should read, understand and comply with all provisions of the Handbook. It describes many of your responsibilities as an associate and outlines the programs developed to benefit you. (Note: The term “associate” is used throughout this handbook to refer to an employee of the company.)

This Handbook is neither a contract of employment nor a legal document. It is not intended to create an expressed or implied contract or a guarantee of employment for any term. Your employment with Towne Park is “at will”, which means that at all times during your employment, you have the right to terminate your employment, and Towne Park has the right to terminate your employment, for any reason or no reason, so long as there is no violation of applicable federal, state, or local law.

No associate handbook can anticipate every circumstance or question about policy. As we continue to grow, the need may arise and Towne Park 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. The only exception to any changes is our employment-at-will policy permitting you or Towne Park to end our relationship for any reason at any time. The most recent electronic version of the handbook can be found on *Workday*, a website available to all associates, and Workday your employee human resource product with all your personal data.

Finally, some of the subjects described here are covered in detail in official policy and procedure documents. You should refer to these documents for specific information, since this Handbook only briefly summarizes those subjects. Please note that the terms of the written insurance policies are controlling.

### Workday Access:

Workday is the system you use to manage your personal information, pay and benefit selections, as well as obtain your pay records. Upon hire you will receive direct communication with your login information. You may also contact your manager or the Careline for information on how to access Workday.

## **100. EMPLOYMENT**

### **101. Equal Employment Opportunity**

In order to provide equal employment opportunities to all individuals, employment decisions will be based on merit, qualification, and abilities. Towne Park does not discriminate in employment opportunities or practices on the basis of race, color, religion, sex, national origin, age, disability, sexual orientation or any other characteristic protected by applicable law.

This policy of Equal Employment Opportunity applies to all policies and procedures relating to recruitment and hiring, compensation, benefits, termination and all other terms and conditions of employment.

We will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship. Any associate with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of the Human Resources Department at 1-866-441-4313 or email us at [careline@townepark.com](mailto:careline@townepark.com).

### **102. Immigration Law Compliance**

Towne Park is committed to employing persons who are authorized to work in the United States and does not unlawfully discriminate on the basis of citizenship or national origin.

In compliance with Company policy and the Immigration Reform and Control Act of 1986, each new or rehired associate, as a condition of employment, must complete the Employment Eligibility Verification Form I-9 and present documentation establishing identity and employment eligibility according to the USCIS List of Acceptable Documents.

Towne Park participates in state and federal programs to validate employment eligibility.

Associates with questions or seeking more information on immigration law compliance issues are encouraged to contact a Human Resources Representative. Associates may raise questions or complaints about immigration law compliance without fear of reprisal.

### **103. Non-Discrimination and Anti-Harassment Policy**

Towne Park is an equal opportunity employer and is committed to maintaining a work environment that is free from unlawful discrimination and harassment. We believe that unlawful discrimination and harassment, either intentional or unintentional, have no place in the work environment. Accordingly, it has been and shall continue to be Towne Park's policy that its associates and their work environment shall be free from all forms of unlawful discriminatory practices and harassment on the basis of race, color, religion, sex, pregnancy, age, national origin, disability, military status, sexual orientation or any other protected status under applicable local, state, or federal law, whether the discrimination or harassment is caused by another peer associate, a manager or other person.

Unlawful harassment can include, but is not limited to, slurs, threats, derogatory comments and unwelcome jokes that would make a reasonable person experiencing such harassment uncomfortable in the work environment or that would interfere with the person's job performance. Additionally, unlawful harassment can include, but is not limited to, verbal and physical conduct of a sexual nature by any associate, supervisor, manager, client, guest, or other person, including sexual advances, requests for sexual favors, making obscene

gestures, whistling or leering, or other conduct such as uninvited touching and sexually-related comments, jokes or innuendo that tend to create an intimidating, hostile or offensive work environment. If you are uncertain whether a behavior is acceptable, consider whether the action reflects a basic consideration and respect for the other person's feelings, or whether you would appreciate the same action or words directed at a member of your family. In general, if there is any question or uncertainty about the acceptability of an action or behavior, then it should probably be avoided.

#### **104. How to Report Instances of Harassment And/Or Discrimination**

We cannot resolve matters that are not brought to the attention of an appropriate member of management. Therefore, everyone will be held accountable for accomplishing our goal of a workplace free from discrimination and harassment. Do not assume that the Company is aware of the conduct.

Any associate who believes he or she is being subjected to unlawful harassment or discrimination by a co-worker, manager, client, guest, or other individual (whether employed by the Company or not), or who believes that his or her employment is being adversely affected by such conduct, is directed to report such incidents and any other observations of unlawful harassment or discrimination to the Human Resources Department at 1-866-441-4313 or email us at [careline@townepark.com](mailto:careline@townepark.com). If for any reason the associate is uncomfortable discussing the matter with the Human Resource Department, the associate is directed to report the matter to the Company's General Counsel.

Additionally, any associate or Account Manager/Corporate Supervisor who becomes aware of any possible unlawful discrimination or harassment (or any other potential violation of this policy), whether he or she is personally affected or not, must advise the Human Resources Department or the President of the Company.

#### **105. Investigations**

Towne Park will endeavor to conduct a prompt investigation of all reported claims or observed behavior of possible unlawful harassment or discrimination, and then take appropriate action based on its investigation. Since allegations of harassment or discrimination are serious matters for all concerned, associates will be expected to fully cooperate in our efforts to investigate and enforce this policy. For the same reasons, discretion will be utilized in investigating and, where appropriate, remedying improper conduct. Information will be kept as confidential as possible and will be released only on a "need to know" basis. In many instances, we may determine that the nature of the allegations require that Associates not disclose their participation in the investigation or the substance of the information they provide to an investigator with others. We will make such determinations on a case-by-case basis, and will advise you if we do require that such confidentiality be maintained.

#### **106. Our Commitment to an Effective Harassment And Discrimination Policy**

We will not tolerate any retaliation against an associate for making a good faith harassment or discrimination complaint or for cooperating in a harassment or discrimination investigation.

Associates will be subject to disciplinary action that may include discharge for violations of this policy. Violations of this policy include, but are not limited to, harassing or retaliating conduct, failure or refusal to cooperate in an investigation concerning reported incidents of harassment or discrimination, or other actions contrary to this policy.

#### **107. Accommodation**

Consistent with this policy of nondiscrimination, we will provide reasonable accommodations to qualified individuals with a disability, as defined by the Americans with

Disabilities Act (ADA) or applicable state or local law, who has made us aware of his or her disability, provided that such accommodation does not constitute an undue hardship on Towne Park.

Associates with a disability who believe they need a reasonable accommodation to perform the essential functions of their job should contact the Human Resources Department. Upon notification that a disability needing accommodation may exist, we may need information from your physician(s) or other health care provider(s) to determine whether an appropriate reasonable accommodation can be implemented. We will work with you to determine an appropriate reasonable accommodation, and will require active participation on your part to identify and provide an accommodation to you.

This policy is neither exhaustive nor exclusive. We are committed to taking all other actions necessary to ensure equal employment opportunity for personal with disabilities in accordance with the ADA and all other applicable federal, state and local laws.

An associate or job applicant who has questions regarding this policy or believes that he or she has been discriminated against based on a disability should notify the Human Resources Department. All such inquiries or complaints will be treated as confidential to the extent permissible by law.

Additionally, if an associate is requesting an accommodation for any other qualified reason Towne Park will review and, if valid, endeavor to provide an appropriate accommodation.

*Note for Maryland associates: Towne Park will provide a reasonable accommodation for pregnant associates in accordance with Maryland's Reasonable Accommodations for Disabilities Due to Pregnancy Act.*

### **108. Hiring of Relatives**

The employment of relatives in the same area of any organization may cause serious conflicts and problems with favoritism and associate morale. In addition to claims of partiality in treatment at work, personal conflicts from outside the work environment can be carried into day-to-day working relationships. For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the associate is similar to that of persons who are related by blood or marriage.

We discourage the supervision of associates by a relative. Although we have no prohibition against hiring relatives of existing associates, we are committed to monitoring situations in which relatives work in the same area. In case of actual or potential problems, we will take prompt action. This can include reassignment or, if necessary, termination of employment for one or both of the individuals involved.

### **109. Conflicts of Interest**

Associates have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. This policy establishes only the framework within which we wish the business to operate. The purpose of these guidelines is to provide general direction so that associates can seek further clarification on issues related to the subject of acceptable standards of operation. Contact the Human Resources department for more information or questions about conflicts of interest.

An actual or potential conflict of interest occurs when an associate is in a position to influence a decision that may result in a personal gain for the associate or for a relative as a result of Towne Park's business dealings. For the purposes of this policy, a relative is

any person who is related by blood or marriage, or whose relationship with the associate is similar to that of persons who are related by blood or marriage.

No “presumption of guilt” is created by the mere existence of a relationship with outside firms. However, if associates have any influence on transactions involving purchases, contracts, or leases, it is imperative that they disclose to an officer of Towne Park as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.

Personal gain may result not only in cases where an associate or relative has a significant ownership in a firm with whom we do business, but also when an associate or relative is promised or receives any kickback, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving Towne Park.

No associate may solicit or accept gifts of significant value (i.e., in excess of \$25.00), lavish entertainment or other benefits from potential and actual customers, suppliers or competitors. Special care must be taken to avoid even the impression of a conflict of interest.

An associate may entertain potential or actual customers if such entertainment is consistent with accepted business practices, does not violate any law or generally accepted ethical standards and the public disclosure of facts will not embarrass Towne Park.

#### **110. Duty of Fidelity**

Associates owe a duty of loyalty and fidelity to Towne Park. Associates are expected to perform their duties on behalf of Towne Park faithfully, diligently and to the best of their abilities.

#### **111. Harm to Business, Reputation or Branding**

Associates must refrain from engaging in conduct that could adversely affect the Towne Park’s business or reputation. Such conduct includes, but is not limited to:

1. Conduct that falsely claims to be from or on behalf of Towne Park, or that fails to adequately disclaim Towne Park involvement, when linking to an Associate’s personal website, weblog, or other personal site (such as Linked In, Twitter, and Facebook);
2. Conduct that is critical of Towne Park’s customers or its customers products or services;
3. Conduct that is critical of the quality of Towne Park’s services to its customers;
4. Engaging in criminal conduct or other behavior that could harm Towne Park’s business or reputation; or
5. misuse or unauthorized use of Towne Park’s intellectual property or proprietary information in a manner which relates to its products, pricing, customer service, marketing or business strategies, processes and related technologies.

#### **112. Outside Employment**

A non-management associate may hold a job with another organization as long as he or she satisfactorily performs his or her job responsibilities with Towne Park. The only restriction to this policy is an associate may not work directly for a client of Towne Park where the associate is also directly providing Towne Park services. All associates will be held to the same performance standards and will be subject to scheduling demands, regardless of any existing outside work requirements.

All management personnel are required to obtain written approval from their District Manager or Corporate Manager before participating in outside work activities. Approval can be granted unless the activity conflicts with Towne Park's interests. In general, outside work activities are not allowed when they:

- Prevent the associate from fully performing work for which he or she is employed including overtime assignments;
- Involve organizations that are doing or seek to do business with Towne Park, including actual or potential vendors or customers; or
- Violate provisions of law or Towne Park's policies or rules.

From time to time, associates may be required to work beyond their normally scheduled hours. Associates must perform this work when requested. In cases of conflict with any outside activity, the associate's obligations to Towne Park must be given priority.

### **113. Non-Disclosure**

The protection of confidential business information and trade secrets is vital to our interests and success. Such confidential information includes, but is not limited to, the following examples:

- Computer programs and codes
- Financial information (including pricing)
- Contract information
- Marketing strategies
- Training programs
- Pending projects and proposals
- Proprietary processes
- Research and development strategies

Associates who are exposed to confidential information may be required to sign a business protection agreement as a condition of employment. Associates who improperly use or disclose trade secrets or confidential business information will be subject to disciplinary action, up to and including termination of employment and legal action, even if they do not actually benefit from the disclosed information.

No Towne Park, Towne Park-related or Client information, including without limitation, documents, notes, training programs and materials, files, records, oral information, computer files or similar materials (except in the ordinary course of performing duties on behalf of Towne Park) may be removed from Towne Park's premises without permission of Towne Park. Additionally, the contents of Towne Park's or the Client's records or information otherwise obtained in regard to business may not be disclosed to anyone, except where required for a business purpose. Associates must not disclose any confidential information, purposefully or inadvertently through casual conversation, to any unauthorized person inside or outside Towne Park. Associates who are unsure about the confidential nature of specific information must ask their Account Manager/Corporate Supervisor for clarification. Associates will be subject to disciplinary action, up to and including termination of employment, for knowingly or unknowingly revealing information of a confidential nature.

### **114. Company Spokesperson(s)**

Only the CEO or COO are authorized to represent Towne Park publicly in the media. The VP of Talent has the discretion to manage Towne Park leadership in seeking authorization

directly from either the Chief Executive Officer or Chief Operating Officer prior to making public statements, speaking for or representing Towne Park in the media.

### **115. Confidentiality**

As an associate of Towne Park, you may learn information about the company that is not generally known to the public. This information might be about trade secrets, business plans, acquisitions or dispositions of assets, marketing and sales programs, financial results, customer or supplier information (including the pricing we charge), payroll information, audits, or other confidential or proprietary information that could affect Towne Park's financial or competitive position. Whether or not this type of information is specifically identified to you as confidential, you must hold such information in the strictest confidence. All information is to be treated as confidential and must not be disclosed to any person or entity outside Towne Park unless and until Towne Park has made public disclosure of such information. Confidential information must also not be disclosed to any other associate or contractor of Towne Park unless they have a need to know such information in connection with their business responsibilities to Towne Park.

You may also be subject to state or federal laws that regulate use and disclosure of personal and financial information of customers, clients and associates of Towne Park. You should therefore strictly adhere to company policies when dealing with sensitive and confidential information or personal and financial information of customers.

In addition, for associates at healthcare facilities, patient confidentiality must be maintained in accordance with the Health Insurance Portability and Accountability Act (HIPAA). In accordance with HIPAA guidelines, Towne Park has developed the following standards and policies: (NOTE: HIPAA and confidentiality applies to information regarding fellow Towne Park associates as well as guests, patients, clients.)

- Towne Park associates must maintain and protect the confidentiality of patients and/or guests as well as other information in accordance with applicable legal and ethical standards.
- Towne Park and its associates may have access to a broad variety of confidential, sensitive information. Protected Health Information (PHI) is defined as any information that can be used to identify past, present or future physical or mental conditions as related to health services. The inappropriate release of such information could be injurious to individuals, Towne Park and its clients.
- Associates must refrain from divulging confidential information from any source about a patient or Towne Park itself.
- Every Towne Park associate has an obligation to actively protect and safeguard such information in a manner designed to prevent its unauthorized disclosure.
- As a Towne Park associate you may hear conversations with PHI. This information must never be repeated and penalties for violating the law range from \$100-\$250,000 and up to 10 years in prison.
- If questions arise regarding an obligation to maintain confidentiality or the appropriateness of releasing such information, associates should seek guidance from their manager or the Towne Park Corporate Office.
- If a patient or family member inquires about clinical information, conditions, test results or schedules, refer them to the patient's nurse or doctor. Do not discuss a patient's condition with family members or respond inappropriately to emotional outbursts.
- Sometimes guests or patients give us their full name; this information can only be used to help us perform our duty. At no time can we give out information such as

names, locations, or if the person is present at the hospital, unless we have the patient's written consent.

Any associate who violates these policies will be subject to disciplinary action up to and including termination of employment.

## **200. ASSOCIATE CONDUCT AND DISCIPLINARY ACTION**

### **201. Associate Conduct and Work Rules**

It is not possible to list all the forms of behavior that are considered unacceptable in the workplace. For example, any associate may be terminated immediately for any of the following reasons:

- Removing or possessing company property without authorization
- Falsifying company records, including, but not limited to, time records
- Working under the influence of alcohol or illegal drugs, or any other violation of section 202 Drug & Alcohol Use policy
- Possessing, distributing, selling, delivering, or using alcohol or illegal drugs in the workplace, while on duty, or while operating employer-owned vehicles or equipment
- Fighting or threatening violence in the workplace
- Damaging employer-owned or customer-owned property through negligence or improper use
- Improper use of guest vehicles
- Behaving in an insubordinate or other disrespectful manner
- Using profane or vulgar language
- Sleeping on the job
- Engaging in sexual or other unlawful harassment
- Possessing dangerous or unauthorized materials in the workplace, such as explosives or firearms
- Engaging in excessive absenteeism or any absence without notice
- Engaging in an unauthorized absence from the work station during the workday
- Violating conflict of interest or outside employment policies
- Excessive personal telephone calls or unauthorized long distance telephone calls
- Violating safety rules, including failure to report accident, injury or dangerous situation
- Using telephones, mail system, or other employer-owned equipment without authorization
- Violating computer, e-mail, or cell phone policy
- Disclosing business "secrets" or confidential information
- Negligence
- Breach of trust or dishonesty
- Conviction of a felony, misdemeanor, etc
- Deliberate non-performance of work
- Larceny or unauthorized possession of, or the use of, property belonging to any co-worker, visitor, or customer of Towne Park or its clients

- Unauthorized posting of or removal of notices from associate communication boards
- Theft
- Cash handling violation
- Gambling, conducting games of chance or possession of such devices on the premises or during work hours
- Soliciting gifts or tips from guests
- Use of email, the internet, and/or electronic social media in a manner which violates any of the Associate Conduct and Work Rules, including, but not limited to, engaging in sexual or other unlawful harassment and threatening violence in the workplace.
- Any unacceptable change to an associate's MVR (Motor Vehicle Report) which puts them in violation of our minimum driver's criteria

The above instances are intended to be examples and by no means represent a complete list. Employment with Towne Park is at the mutual consent of Towne Park and the associate and either party may terminate that relationship at any time, with or without cause, and with or without advance notice.

## **202. Drug and Alcohol Use**

While on Towne Park's premises and while conducting business-related activities off Towne Park premises, no associate may use, possess, distribute, sell, or be under the influence of alcohol or illegal drugs. The legal use of prescribed drugs is permitted on the job only if it does not impair an associate's ability to perform the essential functions of the job effectively and in a safe manner that does not endanger other individuals in the workplace.

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

Associates with questions on this policy or issues related to drug or alcohol use in the workplace should raise their concerns with their Account Manager/Corporate Supervisor or the Human Resources Department without fear of reprisal.

Consistent with applicable law, Associates may be required to undergo alcohol and drug testing for reasonable cause after accidents that require medical attention or property damage and/or participation in random selection. Associates who refuse testing under these circumstances may be discharged.

### *Reasonable Suspicion*

Whenever possible, the Account Manager/Corporate Supervisor will have the associate observed by a second manager and obtain Human Resource approval before requiring testing. Reasonable cause for testing shall be determined in the sole discretion of Towne Park. Reasonable cause includes, but is not limited to:

1. Observed alcohol or drug abuse during work hours on company premises
2. Apparent physical and/or mental state of impairment
3. Marked changes in personal behavior that are otherwise unexplainable
4. Accidents or other actions that provide reasonable suspicion to believe that the associate may be under the influence of drugs or alcohol

### *Work Related Accidents*

Associates who are involved in a work related accident while on the job or on Towne Park premises or property which results in personal injury or severe property damage, may be required, upon approval from Human Resources, to undergo alcohol and drug testing. Associates who refuse drug or alcohol testing under these circumstances may be discharged.

### *Random Testing*

Due to the nature of our business all or certain areas of operation (such as shuttle operations) may be required to participate in random selection for drug and/or alcohol testing, consistent with applicable law. Whenever Towne Park determines that an associate may be required to undergo substance abuse testing, transportation to the testing facility will be arranged by the Account Manager/Corporate Supervisor or Human Resources. Should the testing facility be unavailable for services, the associate will be suspended and tested when facility services are available.

## **203. Driving Requirements, Safety and Background**

Your driving safety is important to Towne Park and our clients. Any associate driving a company vehicle, a privately owned vehicle on company premises, or a client's/guest's vehicle is expected to observe all state and federal motor vehicle laws, including applicable Department of Transportation (DOT) requirements, and to use safety belts.

Some states may require drivers to have a license in the state where they are working. Driving associates are required to comply with these laws.

All associates who will drive as part of their job duties must have a valid driver's license and are subject to our Minimum Driver's Criteria and/or Shuttle Driver Requirements. If you do any kind of driving as part of your job, you may be required to submit a copy of your driving record annually or authorize Towne Park to pull an updated copy of your driving record. Your driver's license must also be valid. Any changes in your driving record must be reported to your Account Manager.

Failure to do so will result in disciplinary action. Should you hold a license in more than one state, you need to report that as well.

In addition, should you have any changes to your background with criminal offenses including being added to the Sexual Offender's registry, you must notify Towne Park immediately for review.

## **204. Attendance and Punctuality**

We expect you to be reliable and to be punctual in reporting for scheduled work. Absenteeism and tardiness place a burden on other associates and on Towne Park. You are expected to be at your assigned workplace, ready to work at your assigned starting time each day on which you are scheduled to work. Similarly, you are allowed to take authorized breaks and must return within the allotted time.

You are required to properly record your work time. You are expected to accurately:

- clock-in when arriving at the beginning of each scheduled workday;
- clock in/out for meal breaks, and
- clock-out at the end of your scheduled workday.

Lateness: An associate who is not at his/her assigned workplace prepared to work at the beginning of his/her schedule work time is considered to be late. Six minutes or greater is considered late. Note: Conversely, you may not clock in and begin work earlier than 6 minutes before your start time unless first approved by your manager

Absences: Absent time is defined as: (1) Time off without pay; and/or (2) Time charged to Paid Time Off leave. You must notify your Account Manager/Corporate Supervisor in advance, whenever possible, of any absence. When prior notification is not possible, you should call the Account Manager/Corporate Supervisor at least 2 hours prior to the start of your shift. When providing notification, you are expected to give the reason and the estimated length of the absence.

Excessive Absences: It is essential to the business operation to have associates show up to work when assigned. A pattern of frequent and unscheduled absences impedes our ability to properly staff for business demands and is a basis for disciplinary action.

No Call/No Show: Not reporting to work and not calling to report the absence is a no call/no show and is a serious matter. Associates who fail to report to work or contact their manager for two (2) consecutive, scheduled workdays shall be considered to have abandoned their job without notice effective at the end of their normal shift on the second day.

Illness: In the case of illness prior notification is required at least 2 hours prior to the start of your shift. If an illness is longer than three (3) consecutive days or is repetitive in nature Towne Park reserves the right to request a doctor's note. FMLA and state-specific requirements will be applied if applicable.

Associates who violate these policies are subject to termination for job abandonment

## **205. Progressive Discipline**

The major purpose of any disciplinary action is to correct a problem, prevent recurrence, and prepare the associate for satisfactory service in the future. By using progressive discipline in appropriate circumstances, we hope that most associate problems can be corrected at an early state, benefiting both the associate and Towne Park.

Progressive discipline may consist of one or more written warnings or termination of employment, depending on the severity of the problem and the number of occurrences. If you are having a third formal conversation/documentation with your manager in a rolling twelve (12) months regarding performance, a termination review will be required. In some cases, infractions are serious enough to warrant skipping one or more steps of the progressive discipline process (see Section 201 for examples of infractions where progressive discipline is not applicable.) All involuntary terminations require review by a Human Resources Manager prior to action being taken.

## **206. Towne Park Care Line**

The Towne Park Care Line is a service available for our associates. It provides you with a secure place to turn for answers to questions and issues that are important to you. Most of your questions or concerns can quickly be answered by our management team at your location. If you need further assistance, we encourage you to call and leave a brief message describing your issue or concern, and information allowing us to contact you, at the Towne Park Care Line at 1-866-441-4313 or email [careline@townepark.com](mailto:careline@townepark.com). This secure process will then refer your issue to the appropriate person. Towne Park maintains confidentiality to the extent we can based on who is needed to help resolve your issue(s).

When you have questions pertaining to employment, the simple procedure outlined below should be followed to get the answers you need.

- Other than issues of harassment, first discuss your question, issue or concern with your Account Manager/Corporate Supervisor.
- In the event you do not receive an answer to your question or concern or if you are uncomfortable approaching your Account Manager/Corporate Supervisor, then call the Towne Park Care Line at 1-866-441-4313 or email us at [careline@townepark.com](mailto:careline@townepark.com). You may leave a message on at any time during the day. We will return your call by the next business day.
- Your communication will be answered by a Towne Park Care Line HR representative who will ask you specific questions regarding your concern or issue.
- If the Towne Park Care Line representative cannot answer your questions, he/she will refer your inquiry to the appropriate Towne Park executive for follow-up and action. You will be contacted for additional information as necessary.

When you follow these simple steps you will get answers to the questions and issues that are important to you. That's our commitment to you.

### **207. Problem Resolution**

We are committed to providing the best possible working conditions for our associates. This commitment encourages an open and frank atmosphere in which any problem, complaint, suggestion, or question receives a timely response from Towne Park management.

We strive to ensure fair and honest treatment of all associates. Managers and associates are expected to treat each other with mutual respect. Associates are encouraged to offer positive and constructive criticism.

If you disagree with established rules of conduct, policies, or practices, you can express your concern through the problem resolution procedure. No associate will be penalized, formally or informally, for voicing a complaint with Towne Park in a reasonable, business-like manner, or for using the problem resolution procedure.

If a situation occurs when you believe that a condition of employment or a decision affecting you is unjust or inequitable, you are encouraged to contact Human Resources in a timely manner. Delay in reporting the complaint or concern appropriately to Human Resources can diminish the company's opportunity to address such complaint or concern. Please call the Care Line at 1-866-441-4313 or email us at [careline@townepark.com](mailto:careline@townepark.com).

Problem resolution steps include but are not limited to reviewing background information, documents and decision making. This process is done by HR leaders and other senior leaders as required.

Not every problem can be resolved to everyone's total satisfaction, but only through understanding and discussion of mutual problems can you and management develop confidence in each other. This confidence is important to the operation of an efficient and harmonious work environment, and helps to ensure everyone's job security.

## **208. Personal Appearance**

Dress, grooming and personal cleanliness standards contribute to the morale of all associates and affect the business image Towne Park presents to customers and visitors.

During business hours, you are expected to present a clean and neat appearance and to dress according to the requirements of your position. You may be required to adhere to appearance standards as set forth by our clients. Associates who appear for work inappropriately dressed will be sent home and directed to return to work in proper attire. Under such circumstances, associates will not be compensated for the time away from work. Continued failure to adhere to appearance standards may result in disciplinary action and/or immediate termination. Consult your Account Manager/Corporate Supervisor or department head if you have questions as to what constitutes appropriate attire.

### **For Corporate and Non-Uniformed Management Positions:**

Clothing should be clean, pressed and wrinkle free, without faded or frayed areas, and should fit properly (neither tight and fitted, nor loose and baggy). A traditional and professional look should be selected for your business wear.

### **Grooming Standards**

1. Corporate male associates should always be clean shaven. The only permitted facial hair is a neatly trimmed mustache, which may not extend below the corner of the mouth. No other facial hair will be permitted, unless approved in advance by the appropriate Towne Park's Chief Operating Officer.
2. All corporate associates must have a neat haircut. For males this will be a standard, professional style. Females will have a neat hair style without flamboyant decorations. Hair color for both males and females should appear natural.
3. All corporate associates are expected to adhere to minimum standards of personal grooming and hygiene (i.e. daily bathing, wearing deodorant, and dental care). Perfumes, colognes and aftershave should not be used excessively to avoid a potential negative affect on other associates with sensitivities.
4. All corporate associates may at one time or another be on Towne Park properties therefore gauge earrings must be removed prior to reporting to work and removal must not result in a disfigurement or significant alteration from the natural look of the earlobe. Earrings are not allowed for male associates and, unless state or local laws take precedence, males must comply with the same restrictions as females. Other jewelry must be in traditional and moderate in quantity.
5. No readily obvious or visible tattoos or pierced body parts are allowed (other than ear piercing for female associates). The definition of "readily obvious or visible" means:
  - While wearing Towne Park's uniform or business attire, the look of the uniform may not be altered to cover up tattoos or body piercings. For example, wearing a long sleeved shirt when short sleeves are required.
  - Covering of tattoos must look professional and inconspicuous (subtle). For example, wearing an Ace bandage from shoulder to wrist is unprofessional and glaring as is wearing multiple regular band-aids. Alternately, one small/regular sized band-aid is considered inconspicuous and may be used to cover a tattoo.

- Use of skin makeup to cover up tattoos is permissible so long as it matches one's skin tone to not be obvious and does not streak or wear off during the performance of one's job duties.

### Business Casual Attire

Business casual attire is defined as clothing that allows associates to feel comfortable at work, yet is appropriate for a professional office environment. Business casual attire includes, but is not limited to: slacks, dress khakis, sports shirts, golf shirts, polo shirts, skirts and dresses, turtlenecks, sweaters, loafers, and sandals. Clothing must be neat, clean and free from wrinkles.

### Traditional Business Attire

For office settings that require traditional business attire, the following guidelines apply:

- For Men – Acceptable attire includes: business suits; sports jackets or blazers with coordinated slacks; collared shirts; and dress shoes. Ties are required at all times, unless wearing a tie presents a safety hazard.
- For Women – Acceptable attire includes: business suits; pant suits; business dresses; coordinated skirts, blouses, and blazers; and dress shoes.

### Unacceptable Attire

Regardless of the dress code in effect, there are certain types of clothing that may not be worn at work. From time to time, Towne Park may allow special casual days (i.e. “jeans day”) where the standards may be relaxed. Any such opportunities will be announced in advance.

Unacceptable attire includes, but is not limited to:

- cropped pants (“capri pants”);
- denim clothing (including jeans);
- tank tops, t-shirts; sweatpants, sweatshirts, or workout attire;
- cutoffs, beach attire, halter tops or tank tops;
- mid-drifts, dresses, skirts, or shorts that are excessively short;
- sheer clothing or clothing that is revealing, distracting, or provocative; and
- flip-flops or athletic shoes.

Corporate Workers must comply with field grooming and dress standards when on a Towne Park operated property in an official capacity.

Remote Workers must comply with field or corporate grooming and dress standards when on a Towne Park operated property or in the office in an official capacity. If you are participating in any video conference you must dress in a professional manner.

Field Managers must be in an appropriate business suit while on property unless otherwise dictated by the client.

Please contact Human Resources for additional information.

### **For Field Operations Associates:**

Always be in a clean, complete uniform that has been issued by or approved by Towne Park and Towne Park’s client. You will wear site appropriate colors and accouterments. No uniform may be modified without prior approval.

1. Male associates should always be clean shaven. The only permitted facial hair is a neatly trimmed mustache, which may not extend below the corner of the mouth.

- No other facial hair will be permitted, unless approved in advance by the appropriate Towne Park Regional Vice President & General Manager
2. All associates must have a neat haircut approved by Towne Park management and Towne Park's client. For males this will be a standard, professional short style that does not extend below the collar or over the ears. Females will have a neat hair style without flamboyant decorations. Hair color for both males and females should appear natural.
  3. All associates are expected to adhere to minimum standards of personal grooming and hygiene (i.e. daily bathing, wearing deodorant, and dental care). Perfumes, colognes and aftershave should not be used excessively and may be prohibited at locations where there is a potential negative affect on guests with sensitivities.
  4. A watch or one basic ring per hand (such as a wedding band) may be worn. Necklaces and bracelets are not acceptable for either male or female associates.
  5. One small earring (not larger than a quarter) per ear lobe is acceptable for female associates. Gauge earrings must be removed prior to reporting to work and removal must not result in a disfigurement or significant alteration from the natural look of the earlobe. Earrings are not allowed for male associates and, unless state or local laws take precedence, males must comply with the same restrictions as females.
  6. No readily obvious or visible tattoos or pierced body parts are allowed (other than ear piercing for female associates). The definition of "readily obvious or visible" means:
    - i. While wearing Towne Park's uniform or business attire, the look of the uniform may not be altered to cover up tattoos or body piercings. For example, wearing a long sleeved shirt when short sleeves are required.
    - ii. Covering of tattoos must look professional and inconspicuous (subtle). For example, wearing an Ace bandage from shoulder to wrist is unprofessional and glaring as is wearing multiple regular band-aids. Alternately, one small/regular sized band-aid is considered inconspicuous and may be used to cover a tattoo.
    - iii. Use of skin makeup to cover up tattoos is permissible so long as it matches one's skin tone to not be obvious and does not streak or wear off during the performance of one's job duties.
  7. Sunglasses (including transitioning lenses) are prohibited unless approved in advance by the appropriate Towne Park Regional Vice President & General Manager.

In certain circumstances, Towne Park may make exceptions or modifications to these standards if required to accommodate an Associate's religious beliefs or medical needs. Associates who believe they may need such an accommodation should contact Towne Park Care Line at 1-866-441-4313 or email [careline@townepark.com](mailto:careline@townepark.com).

## **209. Uniforms**

All associates required to be in uniform will be issued uniforms. There will be no cost to you for most of the uniform items. You may be required to purchase some of the uniform items (such as shoes). You may be required to sign an agreement that requires you to

maintain the uniform in acceptable condition (except normal wear) and that at the time of termination the uniforms must be returned to us in this condition. Any uniforms that are not returned or are damaged will become your responsibility and the cost of replacement uniforms may be withheld from the final paycheck, consistent with applicable law.

Over time, as uniforms wear out, we will provide a replacement uniform in exchange for the worn out one so long as the wear is from normal use. Subject to applicable law, should you lose or damage a uniform, you may be responsible for purchasing a replacement. It will always be your responsibility to ensure that you maintain the uniform in a condition consistent with our dress standards.

#### **210. Business Conduct/Ethic and Reporting Irregularities**

It is the responsibility of all associates of Towne Park to report irregularities to Human Resources. Knowledge of significant/severe irregularities and not reporting it can, in some cases, hold you to some degree of culpability. Irregularities can range from significant service failures to unusual accounting practices. Some examples of unusual accounting practices can range from holding or modifying cash/cash drops to giving away short term and prepaid ticketing. Should you feel there is any type of irregularity at your property, please contact Human Resources at 1-866-441-4313 or email us at [careline@townepark.com](mailto:careline@townepark.com). We will do our utmost to keep the information confidential and only involve necessary parties needed to conduct an investigation.

#### **211. Personal and Social Relationships in the Workplace**

We strive to provide a workplace free of favoritism. We have no desire to interfere with the private lives of our associates or their off duty conduct. However, where such conduct impacts the work environment in a negative manner, management may take whatever action is appropriate, in its discretion, to protect the company's interests.

You should maintain professional and business-like relations with all associates, client's associates and client's guests/patients at all times. With the exception of company-sponsored functions, fraternization with associates of the client or guests is not allowed on the work premises. In addition, it is strictly forbidden to fraternize with guests outside the work premises. The intimate or social relationships between non-management associates will be addressed only when and if they create work environment issues.

All managers are responsible for maintaining a professional business environment. An intimate relationship between individuals who have a direct or indirect supervisory relationship is highly inappropriate. If such a situation develops, the involved associate in the supervisory role must communicate this fact to Human Resources so that a transfer or reassignment may be considered for either party.

Failure to follow this policy is considered serious misconduct and may result in disciplinary action up to and including termination of employment.

#### **212. Hotel Rooms for Towne Park Associates or Friends**

No one in the company may obtain hotel rooms from any of our hotel clients for Towne Park associates or friends in any hotel operated by Towne Park without the prior consent of a District Manager or Vice President. (Account Managers are not authorized to provide this consent.)

If approved we expect you and your family and friends to behave in a manner that represents Towne Park in a positive manner. Failure to comply with this policy will result in disciplinary action up to and including termination of employment.

### **213. Return of Property**

You are responsible for all Towne Park property, uniforms, materials, or written information issued to you or in your possession or control. All Towne Park property must be returned by you on or before your last day of work. Where permitted by applicable laws, we may withhold from your check or final paycheck the cost of any items that are not returned when required. Towne Park may also take all action deemed appropriate to recover or protect its property.

### **214. Security Inspections**

We wish to maintain a work environment that is free of illegal drugs, alcohol, firearms, explosives, or other improper and/or dangerous materials and substances. To this end, Towne Park prohibits the possession, transfer, sale or use of such materials and substances on its premises. We require the cooperation of all associates in administering this policy.

Desks, lockers, and other storage devices may be provided for the convenience of associates, but remain the sole property of Towne Park. Accordingly, they, as well as any articles found within them, can be inspected by any agent or representative of Towne Park at any time, either with or without prior notice to the associate.

Additionally, Towne Park does not tolerate theft or unauthorized possession of the property of associates, Towne Park, visitors, and customers. To facilitate enforcement of this policy, Towne Park, or its agents or representatives may inspect not only desks and lockers but also persons entering and/or leaving the premises and any packages or other belongings. This also includes coats, backpacks, briefcases, work areas and personal vehicles parked on Towne Park or client property. Such searches may be conducted at any time without advance notice.

Refusal to consent to a search or inspection may result in immediate termination of employment. Any associate who wishes to avoid inspection of any articles or materials should not bring such items onto Towne Park's and/or the client's premises.

You are prohibited from using personal locks on Company property unless specifically authorized by management to do so. In the event you are permitted to use a personal lock on Towne Park or client property, you must provide your supervisor with a copy of the key or combination of all locks.

### **215. Solicitation, Distribution and Use of Bulletin Boards**

Persons not employed by Towne Park may not solicit or distribute literature in the workplace at any time for any purpose.

We recognize that you may have interests in events and organizations outside the workplace. However, you may not solicit or distribute literature concerning these activities during your working time or the working time of the person being solicited. (Working time does not include lunch periods, work breaks, or any other periods in which associates are not on duty.) **At no time may any Towne Park associate solicit or distribute literature concerning these activities to any employee of our client or their guests.**

In addition, the posting of written solicitations on company bulletin boards is prohibited. Bulletin boards are reserved for official organization communications on items such as internal memoranda. All posted material must have authorization from Human Resources. All associates are expected to check these bulletin boards periodically for new and/or updated information and to follow the rules set forth in all posted notices. Associates are not to remove material from the bulletin boards.

## **300. TIMEKEEPING & PAYROLL**

### **301. Timekeeping**

Towne Park's policy is to pay you for *all* your time worked. (Time worked is all the time actually spent on the job performing assigned duties.) To maintain that policy, it is imperative that you accurately record time worked in the manner prescribed by Towne Park. This is a requirement of your job. You may not, under any circumstances, inaccurately report or fail to report any time worked.

You should accurately record the time you begin and end your work, as well as the beginning and ending time of each meal period. If you have a missing or incorrect punch you must notify your manager *immediately* and follow Towne Park's established process for correcting a punch to ensure proper time records and pay.

To help ensure associates are taking proper and complete meal breaks, Towne Park has programmed its time systems to prevent associates from clocking back from a meal break prior to the mandatory 30 minutes. However, in the event you take a meal break shorter than 30 minutes you *must* follow Towne Park's established process for correcting your punch to reflect the actual time you returned from your break. The timeclock "lock out" function is intended to encourage associates to take their full breaks – not to create inaccurate time records. Therefore, you must *always* (and without exception) correct your time to reflect any meal periods of less than 30 minutes. If you have any difficulties in this regard, simply contact your manager to report the fact that you took a short lunch.

Under no circumstances may anyone: (a) alter, falsify, or tamper with your time; (b) ask, require, or pressure you to work "off the clock" or to misrepresent your hours worked; or (c) otherwise violate or pressure you to violate the above timekeeping requirements. If anyone does so, it is your obligation to *immediately* report such conduct to Towne Park's Careline— even if someone threatens you not to share such information. *You will never be disciplined or retaliated against for raising good faith complaints.* We cannot help you resolve problems if they are not timely reported. Our policy is to individually investigate and respond to all good faith complaints.

Similarly, under no circumstances may you alter, falsify, or tamper with time records, or record time on another associate's time record. Any of this conduct may result in disciplinary action, up to and including termination of employment.

### **302. Meal & Rest Periods**

Towne Park's policy is to provide associates with all meal and rest periods required by law. Further, you are required to actually take all meal and rest periods in the manner required under the particular state and federal laws applicable where you work. Therefore, you are required to familiarize yourself with Towne Park's specific meal and rest period rules applicable where you work.

Because state laws differ and particular locations may have unique policies, this

Handbook does not provide a detailed description of the meal and rest rules applicable in every location. *You are required to check Towne Park's written policies to familiarize yourself with the rules applicable where you work.* In addition, most Towne Park facilities hang posters describing the applicable meal/rest rules, and Towne Park will provide periodic training regarding these rules. If you have difficulty locating the applicable policies or have questions, please contact your manager or the Careline **at 1-866-441-4313 or email [careline@townepark.com](mailto:careline@townepark.com)**. In most circumstances Towne Park will schedule your breaks for you, but it is up to you to ensure you are taking proper breaks at the proper times in compliance with company policy.

In addition to the rules specific to your work location, please keep in mind the following:

You must always accurately record the start and stop time of all meal breaks. If you skip a meal break, or take one in a manner that does not comply with company policy your punch records must nevertheless accurately record the break you actually took, or the fact that you did not take a break at all. However, there will be occasions where, due to business demands you may be unable to take a proper meal break. These should be infrequent and due to unforeseen circumstances. If you are concerned this is happening too frequently please contact the Careline. The company will address the situation, ensure you are treated and paid in compliance with applicable law, and you will not be disciplined. However, if you simply fail to comply with company policy regarding meal periods, you may be subjected to disciplinary action, up to and including termination of employment.

You are not required to record the start and stop times of rest breaks. However, if you skip a rest break, or take one in a manner that does not comply with company policy, you must immediately report such an event to your account manager. However, there will be occasions where, due to business demands you may be unable to take a proper rest breaks. These should be infrequent and due to unforeseen circumstances. If you are concerned this is happening too frequently please contact the Careline. The company will address the situation, ensure you are treated and paid in compliance with applicable law, and you will not be disciplined. However, if you simply fail to comply with company policy regarding meal periods, you may be subjected to disciplinary action, up to and including termination of employment.

Under no circumstances may anyone ask, require or pressure you to violate company policies relating to meal and rest breaks, or pressure you to misrepresent when and how you take your breaks. If anyone does so, it is your obligation to *immediately* report such conduct to the Careline – even if someone threatens you not to share such information. *You will never be disciplined or retaliated against for raising good faith complaints.* We cannot help you resolve problems if they are not timely reported. Our policy is to individually investigate and respond to all good faith complaints.

### **303. Tip Reporting and Tip Credit**

Where applicable under federal and state law Towne Park takes a tip credit using tips as part of earned wages to satisfy minimum wage obligations. A “tipped employee” as defined by the IRS is “any employee engaged in an occupation which he customarily and regularly receives more than \$20 a month in tips.” Tipped Associates are required to accurately report 100% of their tipped income. Towne Park will provide tipped associates the opportunity to report their tipped income. Please advise your Account Manager if you believe you may have inaccurately recorded your tips. Please understand that failure to accurately report tips exposes every team member and every location to the risk of an IRS audit. The IRS can review up to three (3) years in assessing prior year federal taxes, state

taxes, FICA taxes, penalties, and interest on unreported income. It is important that you protect yourself from potential audits or tax penalties by maintaining good records and reporting all tips.

To ensure with tip reporting guidelines, Towne Park may periodically review tip reporting. Investigations of potential underreporting may involve interviewing other team members, watching guest tipping habits, and inspecting staff tipping records.

We have standard procedures for tip collection and disbursement. It is a requirement of all associates to comply with those procedures. Associates in position considered by Towne Park as part of the chain of service are eligible to participate in tip disbursement. In no event should any supervisors (*i.e.: any associate with authority to hire, discharge, discipline or meaningfully direct/control the work of other associates*) participate in or receive any tip disbursements.

### **304. Paydays**

All associates will be paid biweekly on Friday. For hourly associates, each pay will include earnings for all work performed through the end of the previous payroll period. Salaried, exempt associates are paid biweekly for all work performed in the same biweekly period. In the event that a regularly scheduled payday falls on a holiday, you will be paid on the business day prior to the regularly scheduled payday. You may find the published pay dates on Workday.

### **305. Direct Deposit and Paycards**

To ensure the secure and convenient availability of your earnings, we offer two electronic options to receive your pay; direct deposit, and a VISA pay card program. Only in states where law requires paper check, can an associate choose to "opt out" of one of the electronic methods. In "opt out" states, associates can elect their method of payment, or "opt out" of electronic payment and received a paper check. *Opt out states as of June 2013, are: Alaska, Arkansas, California, Connecticut, DC, Florida, Georgia, Hawaii, Idaho, Illinois, Iowa, Maryland, Minnesota, Montana, Nevada, New Hampshire, New Jersey, New Mexico, New York, Oregon, Pennsylvania, Rhode Island, Vermont, Virginia, West Virginia, Wyoming.* If you do not work in an opt out state, you will receive a VISA paycard to access your earnings unless you have another source of receiving direct deposit.

Associates in opt out states may choose to opt out by contacting your Account Manager/Corporate Supervisor. If you chose to opt out of the paycard option and do not have direct deposit you will receive a paper check.

All of your pay information may be found on Workday.

### **306. Replacement of Paycards**

In the event of a lost paycard, your Account Manager/Corporate Supervisor must be notified as soon as possible. You will be advised on the best method for obtaining a replacement card.

In the event of a lost pay card, you must notify the Pay Card Customer Careline at 800-279-5066 immediately to report the card lost and request a replacement card.

### **307. Pay Adjustments and Corrections**

You are responsible for ensuring that your pay check accurately reflects payment for all work you have performed for Towne Park during the applicable pay period. If there is an

error in your pay, you must immediately bring it to your Account Manager's/Corporate Supervisor's attention. All corrections/adjustments will be processed as soon as possible.

If you have not received a quick and satisfactory resolution to an error in your pay, you must then contact the Careline for immediate escalation at 1-866-441-4313 or email us at [careline@townepark.com](mailto:careline@townepark.com). We encourage you to raise concerns to our attention and you will never be retaliated against for raising good faith complaints or concerns.

### **308. Work Location and Taxation**

It is Towne Park's business model to share associates between work sites. In doing so, at times those associates may cross state lines. It is the associate's responsibility to obtain a new state tax form for any new state they will be working in and submit it to their Account Manager or Corporate Supervisor. Towne Park processes state withholding based on "worked in" location. The appropriate forms need to be completed in order to be taxed accordingly.

If you change your address in Workday you will be sent a "To Do" that connects you to the links for the appropriate state tax form.

You may also go to [statew4.com](http://statew4.com) to obtain a correct state W4 form to remit to Towne Park.

### **309. How Overtime is Calculated**

Towne Park pays overtime in compliance with applicable state and federal law. State laws vary so please check with your local Human Resources representative if you have questions regarding the calculation of your overtime or overtime rates. It is possible you may have two separate rates of pay if you work more than one job in a given week that are considered in overtime calculations.

Towne Park's work week for the purpose of overtime calculations is Monday through Sunday.

## **400. WORK CONDITIONS AND HOURS**

### **401. Safety**

To assist in providing a safe and healthful work environment for associates, customer and visitors, we have established a workplace safety program. This program is a top priority. We provide information to associates about workplace safety and health issues through regular internal communication channels such as associate meetings, bulletin board postings, memos, or other written communications.

Some of the best safety improvement ideas come from associates. Those with ideas, concerns, or suggestions for improved safety in the workplace are encouraged to raise them with their Account Manager/Corporate Supervisor/District Manager and/or other corporate personnel such as the Loss Prevention Manager. Reports and concerns about workplace safety issues may be made anonymously if the associate wishes by using the Towne Park Care Line 1-866-441-4313 or email at [careline@townepark.com](mailto:careline@townepark.com). Reports can be made without fear of reprisal.

You are expected to obey safety rules and to exercise caution in all work activities. You must immediately report any unsafe condition to your Account Manager/Corporate Supervisor. Associates who violate safety standards, who cause hazardous or dangerous

situations, or who fail to report or, where appropriate, remedy such situations, may be subject to disciplinary action, up to and including termination of employment.

In the case of accidents that result in injury, regardless of how insignificant the injury may appear, you should immediately notify the Account Manager/Corporate Supervisor or Human Resources. Failure to do so may jeopardize eligibility for Workers' Compensation at a later date.

#### **402. Work Schedules**

Work schedules for associates vary throughout the organization. Account Managers/Corporate Supervisors will advise you of your individual work schedule. Staffing needs and operational demands may necessitate variations in starting and ending times, as well as variations in the total hours that may be scheduled each day and week.

Flexible scheduling is available in some cases to allow you to vary your starting and ending times each day within established limits. Please discuss with the Account Manager/Corporate Supervisor involved. Issues such as staffing needs, your performance, and the nature of the job will be considered before approval.

#### **403. Working at Multiple Properties**

The company reserves the right to assign you to a different work location as needed to meet business or staffing demands. When working at a location other than your home property you will be paid, minimally, at the base rate of the property and position to which you were reassigned. The current base rate(s) for the location you may be required to work are available upon request.

#### **404. Overtime**

When operating requirements or other needs cannot be met during regular working hours, associates will be required to work overtime. All overtime work must receive the Account Manager's/Corporate Supervisor's prior authorization. Overtime assignments will be distributed as equitably as practical to all associates qualified to perform the required work.

For associates who are eligible for overtime compensation, overtime pay is based on actual hours worked. Time off on sick leave, Paid Time Off (PTO), or any leave of absence will not be considered hours worked for purpose of performing overtime calculations. As with all pay matters, it is imperative that all associates accurately record all hours worked, including all overtime hours worked. If you believe you may have worked overtime and have not accurately been paid for that time, you must promptly report your concerns following the process in Section 306 above.

#### **405. Low Need Time**

In the event that scheduled staff exceeds staffing needs, an Account Manager/Corporate Supervisor may need to temporarily reduce hours. The Account Manager/Corporate Supervisor will attempt to adjust staffing levels to the business demands in a variety of methods to help reduce impact to associates. However, the responsibility to the client to manage staffing and payroll effectively may not be superseded by personal needs.

#### **406. Returning to Work Premises Outside of Work Time**

You are expected to leave the work premises after your work shift is over. Occasionally, circumstances may arise when you are permitted to return to the site after your work shift is over or on your days off. On these occasions, you must obtain management approval prior to returning to the premises.

#### **407. Leaving Property During Work Hours**

Excluding meal breaks in which you are already off the clock, it is recognized that, at times, you must leave the work premises during working hours to conduct pre-notified personal business or emergency. Since the Account Manager/Corporate Supervisor is responsible for the whereabouts of all associates in the department and for maintaining proper staffing at all times, when it is necessary to leave the property at any time during working hours, you must do the following:

1. Obtain permission from your Account Manager/Corporate Supervisor before leaving the property.
2. Punch out when leaving and punch in when returning.
3. Check in with your Account Manager/Corporate Supervisor as soon as you return.

#### **408. Visitors**

Visitors are not allowed on a client's property unless it is an emergency and then, only with the approval of the Account Manager.

#### **409. Parking**

You need to park in the designated areas. Your Account Manager/Corporate Supervisor will show you these areas. You must remove your vehicle from the premises at the end of your shift. If complimentary parking is provided then it is considered a privilege not a right. Violations will result in disciplinary action, revocation of the privilege, and/or termination of employment.

#### **410. Smoking and Chewing Tobacco**

In keeping with our intent to provide a safe and healthful work environment, smoking/chewing tobacco is prohibited throughout the workplace, except in locations where there is a designated smoking area. Smoking/chewing tobacco is allowed only during approved break times.

#### **411. Gum Chewing**

As providers of quality customer service, gum chewing is not allowed while you are working.

#### **412. Use of Phone and Mail Systems**

Personal use of the business telephones for long-distance and toll calls is not permitted. You should practice discretion when making local personal calls and may be required to reimburse Towne Park for any charges resulting from your personal use of the telephone.

The use of Towne Park-paid postage for personal correspondence is not permitted.

#### **413. Cellular Phone and Texting Policy**

##### *Personal Cellular Phones – Hourly Operations Associates*

The use of a cell phone (or similar device) is strictly prohibited while working. In addition, cell phones should not be brought into the workplace. Please leave your cell phone at home or securely in your vehicle before arriving to work. However, you may give the office phone number to any necessary individuals for emergency contact.

##### *Personal Cellular Phones – Salaried and Corporate Staff*

While at work you are expected to exercise the same discretion in using personal cellular phones as is expected for the use of company phones. Excessive personal calls during the work day, regardless of the phone used, can interfere with productivity and be

distracting to others. A reasonable standard the company encourages is to limit personal calls during work time to no more than one per day as needed. You are therefore asked to make any other personal calls on non-work time where possible to ensure that friends and family members are aware of the company's policy. Flexibility will be provided in circumstances demanding immediate attention.

#### *Safety Issues for Cellular Phone Use*

Associates whose job responsibilities include regular or occasional driving and who have a cell phone for business use are expected to follow all applicable cell phone use laws and endeavor to refrain from using their phone while driving. Safety must come before all other concerns. If acceptance of a call is unavoidable and pulling over is not an option, you are to use hand-free options, but only if such use is valid in the state where you are driving. Special care should be taken in situations where there is traffic, inclement weather or you are driving in an unfamiliar area.

Associates whose job responsibilities do not specifically include driving as an essential function, but who use a cell phone for business use, are also expected to abide by the provisions above. Under no circumstances are you allowed to place yourself at risk to fulfill business needs.

At no time may any authorized cell phone user send or read text messages or e-mails while operating a vehicle.

Associates who are charged with traffic violations resulting from the use of their phone while driving will be solely responsible for all liabilities that result from such actions. Violations of this policy will be subject to disciplinary action, up to and including termination of employment.

#### **414. Computer and E-mail Usage**

Computers, computer files, the e-mail system and software furnished to associates are Towne Park property intended for business use. You should not use a password, access a file, or retrieve any stored communication without authorization. To ensure compliance with this policy, computer and e-mail usage may be monitored. All e-mail, documents and any electronic files or media created or stored on a Towne Park issued system or device remains the property of Towne Park. (Use of personal devices such as iPads, etc. are strictly prohibited.)

Towne Park strives to maintain a workplace free of harassment and sensitive to the diversity of its associates. Therefore, we prohibit the use of computers and the e-mail system in ways that are disruptive, offensive to others, or harmful to morale. For example, the display or transmission of sexually explicit images, messages, and cartoons is not allowed. Other such misuse includes, but is not limited to, ethnic slurs, racial comments, off-color jokes, or anything that may be construed as harassment or showing disrespect for others.

E-mail or other electronic methods or media devices may not be used to solicit others for any non-business purposes, including commercial ventures, religious or political causes, and outside organizations.

We provide internet access to some associates for business use only. The policies listed below are a guide to help associates determine proper business Internet usage. We reserve the right to modify policies at any time. If a questionable situation arises, please contact the Human Resources Department, or any other member of management, for

clarification. We reserve the right to monitor and record Internet usage and fileserver utilization of all associates. The company reserves the right to suspend individual user accounts for violation of company policies.

- Passwords must be protected and not shared
- E-mail and file transfers are to be for business use only by authorized users.
- Copying of e-mails, files or any electronic information is not permitted except for approved business purposes.
- Use of another associate's account or accessing their personal files without their consent is strictly prohibited.
- Confidential or protected information is not to be transmitted over the internet without proper encryption and only to authorized or approved recipients.
- All downloaded files or applications are to be scanned for viruses before being saved on the company's network.
- The company's network administrator must approve all downloaded applications before they are installed on any Towne Park system or personal system that might connect to the network.
- Transmission or displaying of harassing, discriminatory, or otherwise objectionable e-mail or files (as determined by the recipient) is strictly prohibited.
- Access to non-business related, obscene, or offensive sites is strictly prohibited.
- Disruptive behavior such as introducing viruses or intentionally destroying or modifying files on the network is strictly prohibited.
- Any personal use of Towne Park devices or the network for commercial or illegal activity is strictly prohibited.
- Transmission of any religious or political messages is strictly prohibited.
- Game playing is strictly prohibited.

You should notify your Account Manager/Corporate Supervisor, the Human Resources Department or any member of management upon learning of violations of this policy. Associates who violate this policy will be subject to disciplinary action, up to and including termination of employment.

#### **415. Workplace Monitoring**

Workplace monitoring may be conducted to ensure quality control, associate safety, security, and customer satisfaction. We may conduct video surveillance of non-private workplace areas. Video monitoring is used to identify safety concerns, maintain quality control, detect theft and misconduct, and discourage or prevent acts of harassment and workplace violence. In addition, all correspondences in the Towne Park email system are stored.

Because we are sensitive to the legitimate privacy rights of associates, every effort will be made to ensure that workplace monitoring is done in a respectful manner and is consistent with legitimate business needs.

#### **416. Use of Equipment and Vehicles**

When using property, you are expected to exercise care, perform required maintenance, and follow all operating instructions, safety standards, and guidelines.

Please notify the Account Manager/Corporate Supervisor if any equipment, machines, tools, or vehicles appear to be damaged, defective, or in need of repair. Prompt reporting of damages, defects and the need for repairs could prevent deterioration of equipment

and possible injury to associates or others. The Account Manager/Corporate Supervisor can answer any questions about an associate'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 avoidable traffic and parking violations, can result in disciplinary action, up to and including termination of employment.

#### **417. Emergency Closings**

At times, emergencies such as severe weather, fires, power failures, or earthquakes, can disrupt company operations. In extreme cases, these circumstances may require the closing of a work facility.

It is the policy of Towne Park that office facilities (i.e.: Annapolis Headquarters, Kansas City Satellite Office) remain open during most periods of inclement weather or other emergency conditions; however, where extraordinary circumstances warrant, Towne Park reserves the right to close a facility. Thus, corporate associates are encouraged to call our dedicated line 410-972-4747 after 6:00 am during periods of adverse weather or emergency conditions to find out if the facility is open or closed on a given day.

##### Corporate Facility Closed

If a facility is announced to be closed on a given day, all exempt level staff will receive their regular pay for the day of closure and remain resourceful in managing their work and deadlines. For corporate hourly associates, on a day of closure, associates will receive an amount equivalent to four hours of base pay for the day. They may choose to utilize any unused PTO for the balance of the day.

##### Corporate Facility Open

If the facility remains open on an adverse day, associates who report to work will receive their normal pay for the day. If an exempt level staff member elects not to report to work for safety reasons, they will receive regular pay for the day and remain resourceful in managing their work and deadlines. If an hourly associate elects not to report to work on a facility open day, the associate can elect to 1) use any accrued paid time off for the missed day or 2) the associate will not be paid for the day. If any associate elects to not report to work, the associate must first call his/her manager or supervisor prior to the beginning of the work day.

##### Remote Corporate Hourly Workers

Remote corporate hourly workers are not affected by a facility closing and will be required to work their normal shift. If systems are affected, remote workers should still provide modified services and be available.

Dedicated associate line 410-972-4747 and the status page web address

<http://www.townepark.com/status.html>

#### **418. Event Travel for Hourly Associates**

On occasion hourly paid associates may be required to travel for work related purposes. When this occurs, hourly paid associates are required to accurately record their time and will be paid in accordance with Towne Park Event Travel for Hourly Associates policy and any applicable state and federal law.

#### **419. Official Headquarters Event – Hourly Volunteering**

Towne Park hosts special fund raising events in partnership with The Foundation and other non-profit organizations. If your manager approves you to work at an event for The Foundation, you will be paid for your work hours only. If you choose to attend any such function and not work, you of course will not be paid.

#### **420. Social Media**

Social media includes items such as blogs, podcasts, discussion forums and social networks. Associates are expected to adhere to laws and policies regarding duty of loyalty, harassment, confidentiality, Towne Park compliance requirements, Code of Conduct and Business Protection Agreement when using or participating in social media. All the rules that apply to other Towne Park communications apply here, specifically: existing or prospective associates/customers/clients; protecting confidentiality, privacy and security; and safeguarding and proper use of Company assets.

Associates may not disclose confidential or proprietary information of or about Towne Park, its affiliates, vendors, or suppliers, that reveals intellectual property or proprietary information relating to pricing, customer service, marketing, or business strategies, processes, and related technologies.

Associates may not, without prior authorization from the appropriate manager, represent that they are communicating the views of Towne Park, or do anything that might reasonably create the impression that they are communicating on behalf of or as a representative of Towne Park.

Associates may not reveal confidential personal identifying information regarding an existing or prospective associate/customer/client (for example, social security numbers, date of birth, or credit card information) or medical or other protected health information. Even if an individual is not identified by name within the information you wish to use or disclose, if there is a reasonable basis to believe that the person could still be identified from that information, then its use or disclosure could constitute a violation of the Health Insurance Portability and Accountability Act (HIPAA) and/or Towne Park policy.

Associates may not use social media to criticize the quality of Towne Park's services to customers, nor may they use social media to criticize the quality of a customer's products or services or otherwise interfere with the relationship between Towne Park and its customers or prospective customers.

## **500. EMPLOYMENT STATUS AND RECORDS**

#### **501. Access to Personnel Files**

We maintain a personnel file on each associate. The personnel file includes such work-related information as the associate's job application, resume, records of training, documentation of performance, salary history, and other employment records.

Personnel records are the property of Towne Park, and access to the information they contain is restricted. Generally, only Account Managers/Corporate Supervisors and management personnel of Towne Park who have a legitimate reason to review information in a file are allowed to do so.

Associates who wish to review their own file should contact the Human Resources Department. With reasonable advance notice, you may review your personnel file in our offices and in the presence of an individual appointed by Towne Park to maintain the files.

### **502. Personnel Data Changes**

It is the responsibility of each associate to promptly update their personnel records in Workday. Your name and/or marital status, personal mailing addresses, telephone numbers and names of eligible dependents, individuals to be contacted in the event of emergency, educational accomplishments, W-4 deductions and other such status reports should be accurate and current at all times.

### **503. Inactive Status**

If you have not worked any hours in a 30 day period your status will be considered inactive and you will be terminated from our system. The only exceptions are during the use of any documented, pre-approved leave for the following purposes: worker's compensation, Paid Time Off, FMLA, or approved ADA leave of absence.

### **505. Full-time/Part-time Status**

Due to the flexible and variable nature of our work schedules, hourly operations associates are NOT classified as either full-time or part-time. Factors that determine the number of hours worked include business volumes, client needs, and the associate's flexibility and availability to work. Eligibility for benefits and PTO programs is based on hours worked over a specified period of time. Refer to benefits materials for eligibility requirements.

### **506. Employment Verification and References**

Towne Park requires that any information pertaining to current or former associates remains confidential and accurate. Therefore, all requests for information, including reference checks, employment verifications, and letters of recommendation must be deferred to the corporate Human Resources department for processing. Managers are not authorized to provide employment verifications and references.

All Requests for Employment Verification and References must be submitted via email (Verification@townepark.com) or fax 508-503-3792.

## **600. ASSOCIATE BENEFIT PROGRAMS**

### **601. Associate Benefits**

Eligible Associates are provided a wide variety of benefits. Benefits eligibility is dependent upon a variety of factors, including job classification. Your Account Manager/Corporate Supervisor can help direct you to resources detailing the benefit category and the programs for which you are eligible. A summary of these benefits, by category, are located on Workday.com

#### **Associate Perks:**

Towne Park partners with many nationwide vendors to provide our associates with a wide variety of discounted services. Perks include discounts on cellular services, office supplies, banking, auto towing, lodging and much more. A list of Perks is posted on Workday.com. Perks are updated as they become available.

## **602. Workers' Compensation Insurance**

This program generally covers any injury or illness sustained in the course of employment that requires medical, surgical, or hospital treatment. Subject to applicable legal requirements, workers' compensation insurance provides benefits after a short waiting period or, if the associate is hospitalized, immediately.

If you sustain work-related injuries or illnesses you should inform your Account Manager/Corporate Supervisor immediately. No matter how minor an on-the-job injury may appear, it must be reported immediately. This will enable an eligible associate to qualify for coverage as quickly as possible. Failure to do so may jeopardize eligibility for Workers' Compensation at a later date.

Neither Towne Park nor the insurance carrier will be liable for the payment of workers' compensation benefit for injuries that occur during an associate's voluntary participation in any off-duty recreational, social, or athletic activity sponsored by Towne Park.

## **603. Bereavement Leave**

Associates who wish to take time off due to the death of an immediate family member should notify their Account Manager/Corporate Supervisor/District Manager immediately. For the purpose of this policy, "immediate family" is defined as the associate's spouse, life partner, parent/legal guardian, child, sibling, grandparent or grandchild; the associate's spouse's parent/legal guardian, child or sibling; or the associate's child's spouse.

It is the intention of Towne Park to provide up to 3 days of paid bereavement leave which will be based on the loss of actual scheduled shifts. Bereavement pay is calculated based on the base pay rate at the time of absence.

Bereavement leave will normally be granted unless there are unusual business needs or staffing requirements. Proof of death may be required. You may, with proper approval, use any available paid leave for additional time off as necessary.

## **604. Jury Duty**

We encourage associates to fulfill their civic responsibilities by serving jury duty when required. Associates may receive up to 10 days of paid jury duty leave over any 12 month calendar year period.

Jury duty pay will be calculated on your base pay rate times the number of hours you would otherwise have worked (scheduled) on the day of absence. If you are required to participate in jury duty beyond the period of paid jury duty leave, you may use any available Paid Time Off or may request an unpaid jury duty leave of absence.

You must show the jury duty summons to your Account Manager/Corporate Supervisor/District Manager as soon as possible so that the Account Manager/Corporate Supervisor/District Manager may make arrangements to accommodate your absence. Of course, you are expected to report for work whenever the court schedule permits.

Either Towne Park or the associate may request an excuse from jury duty if, in our judgment, the associate's absence would create serious operational difficulties.

We will continue to provide health insurance benefits until the end of the month in which the unpaid jury duty leave begins. At that same time, you will become responsible for the full costs of these benefits if you wish coverage to continue. When you return from jury duty, benefits will again be provided by Towne Park according to the applicable plans.

Benefit accruals will be suspended during unpaid jury duty leave and will resume upon return to active employment.

#### **605. Holidays – Salaried and Corporate Associates**

It is our policy to designate and observe certain days each year as holidays. Eligible salaried and corporate associates will receive their regular rate of pay for each observed holiday unless otherwise disclosed.

##### Observed Holidays:

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

In addition, Associates are eligible for Two (2) Floating Holidays each year.

We may schedule work on an observed holiday if it is considered necessary. Work on an observed holiday will be paid as a regularly scheduled work day. In the instance you are required to work on an observed holiday you will be given a replacement holiday. Approval for the replacement holiday is subject to business needs. Replacement holidays will be paid the same as an observed holiday.

#### **606. Holiday Premium Pay Program – Hourly Associates**

It is our policy to designate and observe certain days each year as holidays. Eligible hourly associates who are required to work on any observed holiday will receive Holiday Premium Pay. Holiday Premium Pay is defined as one and a half the associate's rate of pay for the position worked. Our observed holidays are:

- New Year's Holiday (3pm New Year's Eve through midnight New Year's Day)
- Easter
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day
- Christmas Holiday (3pm Christmas Eve through midnight Christmas Day)

#### **607. Non-Standard Holidays**

We recognize that some associates may wish to observe, as periods of worship or commemoration, certain days that are not included in our regular holiday schedule. Accordingly, you may do so if it will not unduly disrupt business and if your Account Manager/Corporate Supervisor approves. Planned days off must be requested two weeks in advance and approved by your Account Manager/Corporate Supervisor. Such days are unpaid unless PTO is available.

#### **608. Benefits Continuation (COBRA)**

The federal Consolidated Omnibus Budget Reconciliation Act (COBRA) gives associates and their qualified beneficiaries the opportunity to continue health insurance coverage under Towne Park's health plan when a "qualifying event" would normally result in the loss of eligibility. Some common qualifying events are resignation, termination of employment,

or death of an associate; a reduction in an associate's hours or a leave of absence; an associate's divorce or legal separation; and a dependent child no longer meeting eligibility requirements.

Under COBRA, the associate or beneficiary pays the full cost of coverage at Towne Park's group rates plus an administration fee. Towne Park provides each eligible associate with a written notice describing rights granted under COBRA when the associate becomes eligible for coverage under Towne Park's health insurance plan. The notice contains important information about the associate's rights and obligations.

## **700. LEAVES OF ABSENCE**

### **701. Unpaid Leaves of Absence**

Towne Park does not provide unpaid leaves of absence. If you do not have PTO or qualify under any mandatory or benefit type leave such as workers compensation, FMLA, military leave, ADA, and have been inactive for over 30 days, your employment will terminate.

### **702. Family and Medical Leave**

We provide family leaves of absence in accordance with the Family and Medical Leave Act (FMLA) or applicable State law. Under the FMLA, eligible associates include those who:

1. Work at a worksite with 50 or more associates within a 75-mile radius
2. Have worked for Towne Park for at least 12 months, and
3. Have worked at least 1,250 hours in the 12 months immediately preceding the leave
4. Have a qualifying reason for leave

Associates who meet the eligibility requirements described above are eligible to take up to 12 weeks of leave during a 12-month period, defined later, for one, or more, of the following reasons:

- to care for a new child, whether for the birth of a son or daughter, or for the adoption or placement of a child in foster care;
- to care for a seriously-ill family member (spouse, child or parent);
- to recover from an associate's own serious illness;
- to care for an injured service member in the family; or
- to address qualifying exigencies arising out of a family member's deployment.

If a husband and wife are both employed by Towne Park, they will be limited to a combined total leave of twelve weeks if the leave is taken for the birth of, or to care for, a newborn child; for the placement of, or to care for, a newly adopted or foster care child; or to care for a sick parent.

Towne Park designates the method used to calculate the 12-month period in which associates can take FMLA leave for qualifying reasons as a "rolling" 12-month period measured backward from the date an employee uses any FMLA leave.

#### Requesting Use of FMLA

*Foreseeable:* If an associate's need for FMLA leave is foreseeable, the associate must give Towne Park at least 30 days' prior notice of the need to take leave.

*Unforeseeable:* When 30 days' notice is not possible, associates must give notice as soon

as practicable (generally within two business days of learning of the need for leave, except in extraordinary circumstances). Failure to provide such notice may be grounds for delaying or denying leave.

Associates are required to provide, at the time of their request for leave, the Certification of Health Care Provider. A Fitness for Duty form will be required to return to work within the prescribed authorized leave. Any associate that exceeds the maximum allowed leave time is not guaranteed continued employment or resumption of their previous position

Leave is unpaid; however, any available Paid Time Off (PTO), accrued and/or entitled to accrue in the benefit year will be applied and run simultaneously with this benefit. For example: if you have two weeks of PTO accrued and take 12 weeks off, two of the 12 weeks will be paid using your PTO and 10 weeks will be unpaid.

Please contact your manager, Human Resources Manager or the Careline at 1-866-441-4313 or email us at [careline@townepark.com](mailto:careline@townepark.com) for more information or to obtain forms.

Where State or local family and medical leave laws offer more protections or benefits to associates, the protections or benefits provided by such laws will apply.

### **703. Military Leave**

A military leave of absence will be granted to associates who are absent from work because of military service in the U.S. uniformed services in accordance with the Uniformed Services Employment and Reemployment Rights Act (USERRA). Advance notice of military service is required, unless military necessity prevents such notice or it is otherwise impossible or unreasonable.

The leave will be unpaid. However, associates may use any available Paid Time Off for the absence. Continuation of health insurance benefits is available as required by the USERRA based on the length of leave and subject to the terms, conditions and limitations of the applicable plans for which the associate is otherwise eligible. Benefit accruals, such as Paid Time Off, will be suspended during the leave and will resume upon return to active employment.

Associates on military leave for up to 30 days are required to return to work for the first regularly scheduled shift after the end of service, allowing reasonable travel time. Associates on longer military leave must apply for reinstatement in accordance with USERRA and all applicable laws.

Associates returning from military leave will be placed in the position they would have attained had they remained continuously employed or a comparable one depending on the length of military service in accordance with USERRA. They will be treated as though they were continuously employed for purposes of determining benefits based on length of service. Contact your Human Resources Manager or the Careline at 1-866-441-4313 or email us at [careline@townepark.com](mailto:careline@townepark.com) for more information about military leave.

## ASSOCIATE HANDBOOK ACKNOWLEDGMENT

Towne Park's Associate Handbook describes important information about the company and I understand it is my responsibility to read and comply with the policies contained in this Handbook and any revisions made to it. I should consult the Human Resources Department regarding any questions not answered in the Handbook. I have entered into my employment relationship with Towne Park voluntarily and acknowledge that there is no specified length of employment. Accordingly, either I or Towne Park can terminate the relationship at will, with or without cause, at any time, so long as there is no violation of applicable federal or state law.

Since the information, policies, and benefits described here are necessarily subject to change, I acknowledge that revisions to the Handbook may occur, except to Towne Park'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 the President of Towne Park has the ability to adopt any revisions to the policies in this Handbook. Furthermore, I acknowledge that this Handbook is not a contract of employment for any particular length of time and contains no contractual rights or provisions.

I acknowledge that I have been given access to the contents of the electronic handbook and any state specific addendums located on Workday. I also acknowledge that I have the direct ability to print or review the handbook at any time from the electronic version or may request a hard copy from Towne Park at any time.

**Associate Signature:** \_\_\_\_\_

**Associate Name (printed):** \_\_\_\_\_

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

*Note: This is a copy of the acknowledgment that is signed during orientation.*