



Employee Handbook

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INTRODUCTION

WELCOME

We welcome you to North Risk Partners and we wish you every success here.

We believe each employee contributes directly to North Risk Partners' growth and success and we hope you take pride in being a member of its #oneTEAM.

This handbook was developed to describe and clarify some of the expectations of our employees, and to outline the policies, practices, procedures, and benefits available to eligible employees. You should familiarize yourself with the contents of the handbook as soon as possible for it will answer many questions about your employment with North Risk Partners.

We hope your experience here will be enjoyable, challenging, and rewarding.

ABOUT THE COMPANY

North Risk Partners is an independent insurance brokerage and risk management advisory firm specializing in strategic solutions for businesses and individuals. The firm's core areas of capability are property and casualty, including commercial, home, auto, farm, and more; and benefits, including health and life plans for employee benefit programs as well as individuals and families. North Risk also has a significant surety bonds practice.

The North Risk Partners team is committed to helping clients face risk head-on with right-fit insurance coverage and attention to opportunities for preventing avoidable losses. For businesses, the firm offers programming and compliance support in the areas of human resources, safety, worksite wellness and more.

NATURE AND PURPOSE OF THE EMPLOYEE HANDBOOK

This handbook is a compilation of personnel policies, practices, and procedures currently in effect at North Risk Partners.

The handbook is designed to provide you with a description of North Risk Partners policies as they pertain to you as an employee, and to help answer many of the questions that may arise in connection with your employment. It presents a standardized approach for the administration of policies to reduce ambiguities and difficulties that might arise from unwritten or inconsistent policies or lack of proper communications.

This handbook and the policies contained herein do not in any way constitute, and should not be construed as, a binding contract of employment or a promise of continued employment between North Risk Partners and the employee.

This handbook does not alter the at-will employment relationship between North Risk Partners and its employees. Please see the at-will employment relationship section for further details.

The handbook is intended solely to describe the present policies and working conditions at North Risk Partners. It does not purport to include every conceivable situation; it is merely meant as a guideline and, unless laws prescribe otherwise, common sense shall prevail. Federal, state and/or local laws will take precedent over company policies where applicable. With regard to your health benefits, for example, the descriptions in this handbook should not be relied upon; rather you should consult the actual plan documents for detailed plan information.

This handbook supersedes and replaces any and all written personnel policies, handbooks, and guides previously distributed to, made available to, or applied to employees of North Risk Partners, and is the only handbook with any force or effect. All prior personnel policies and handbooks are hereby rescinded and revoked.

North Risk Partners complies with applicable state regulations. State specific regulations may be found in the Appendix of this handbook. Any state specific regulation will supersede policies set forth in this handbook.

North Risk Partners reserves the right to apply any or all of these policies in whole or in part at its discretion as it deems appropriate depending on individual circumstances. North Risk Partners can deviate from this handbook as it deems appropriate. The application or non-application of any or all of these policies does not alter or change North Risk Partners' right to apply these policies in whole or in part as it deems appropriate.

North Risk Partners reserves the right to change, withdraw, apply or amend any of our policies or benefits, including those covered in this handbook, at any time. North Risk Partners may notify you of such changes via email, a posting on North Risk Partners' intranet, or via a printed memo, notice, amendment to or reprinting of this handbook but may, in its discretion, make such changes at any time, with or without notice.

As used in this handbook:

"Manager" or "supervisor" means an individual with the authority to assign, direct, and review the work of subordinates.

"Week" is equal to 40 hours as related to "full-time" employees.

"Company", "agency" or "the company" refers to North Risk Partners.

EMPLOYMENT POLICIES

EQUAL EMPLOYMENT OPPORTUNITY

North Risk Partners is fully committed to equal employment opportunities (EEO). All employment decisions will be made without regard to race, color, age, religion, sex, pregnancy, marital status, familial status, disability, national origin, sexual orientation, veteran status, status with regard to public assistance, or activity in a local human rights commission. In addition, we comply with all applicable state and local laws governing non-discrimination in employment in every location in which we maintain facilities.

Decisions concerning employment are based strictly on an individual's qualifications and ability to perform the job under consideration, the comparative qualifications and abilities of the other applicants or employees, and the individual's past performance within the organization. Employment decisions include, but are not limited to: recruitment, hiring, promotions, salary or other compensation, benefits, transfers, corrective actions, layoffs, termination, and training.

If you believe that an employment decision has been made that does not conform to management's commitment to equal opportunity, the matter should be brought promptly to the attention the Employee Relations Department or a member of the company's executive leadership team. Your complaint will be thoroughly investigated. There will be no retaliation against any employee who files a complaint in good faith, even if the result of the investigation produces insufficient evidence to support the complaint. Please see the North Risk Partners Workplace Harassment Policy for additional information.

REASONABLE ACCOMMODATION

North Risk Partners is committed to principles of fair and equitable treatment for all persons with disabilities. Our policy is to provide reasonable accommodation and access for qualified applicants and employees with disabilities, as defined by the Americans with Disabilities Act and other federal, state, and local law.

North Risk Partners will make every effort to provide a reasonable accommodation to the known disability of a qualified applicant or employee to enable the individual to participate in the job application process and/or perform the essential functions of his or her job. An accommodation that would impose an undue hardship on North Risk Partners is not considered "reasonable," as defined by law.

Individuals desiring a reasonable accommodation must let the company know that they need a work-related modification or adjustment due to a disability. An employee who wishes to request a reasonable accommodation should contact the Employee Relations Department and their supervisor to discuss the accommodation. Each request will be handled on a case-by-case basis. North Risk Partners will enter into an interactive process with the employee to

clarify what the individual needs and identify an appropriate reasonable accommodation. North Risk Partners may ask the employee for documentation of his or her disability and functional limitations.

IMMIGRATION LAW COMPLIANCE

North Risk Partners complies with the Immigration Reform and Control Act of 1986 by employing only United States citizens and non-citizens who are authorized to work in the United States. All employees are asked prior to their first day of employment to provide original documents verifying the right to work in the United States and to sign a verification form required by federal law (Form I-9). If an individual cannot verify his/her right to work within three days of hire, North Risk Partners must terminate employment.

WORKPLACE ANTI-HARASSMENT POLICY

There is a responsibility for everyone throughout the company to ensure harassment and/or unwelcome conduct toward any person does not occur. That includes harassment of any employee, customer, vendor, or anyone else who comes into contact with North Risk Partners. The company will not tolerate behavior that violates this policy.

This policy prohibits unacceptable conduct based on gender, sexual orientation, race, color, age, national origin, disability, veteran status, religion or any other legally protected characteristic. Prohibited conduct includes, but is not limited to, the types of behavior described in this policy. Anyone found to violate this policy with respect to another employee, customer, vendor, or visitor will be disciplined in accordance with the company's disciplinary policy. No employee will suffer retaliation for reporting prohibited behavior or for participating in an investigation or inquiry.

Prohibited Conduct

Behavior which employees find to be inappropriate for gender-related reasons or because of sexual content can be particularly difficult to describe or define. As a result our policy does not focus on what conduct would meet the legal definition of sexual harassment. Instead we concentrate on whether particular conduct violates our policy and values. Nonetheless we begin this policy with the technical definition of sexual harassment provided by the Equal Employment Opportunity Commission. Sexual harassment is unwelcome sexual advances or requests or demands for sexual acts or other verbal, nonverbal, or physical conduct of a sexual nature when:

- Submission to this conduct is made - either explicitly or implicitly - a term or condition of an individual's employment
- Submission to or rejection of this conduct by an individual is used as the basis for a "tangible employment action" (e.g., a negative effect on employment such as a demotion, pay cut, failure to get a pay increase, etc.) affecting that individual

- The conduct has the purpose or effect of unreasonably interfering with an individual's work performance or of creating, or resulting in, an intimidating, hostile, or offensive work environment for the harassed employee

Any of the conduct described above would violate our policy; however conduct much less intrusive also can violate our policy. The conduct itself does not have to have sexual content or be of a sexual nature. Also prohibited is conduct that harasses or inappropriately singles out another because of that person's gender, sexual orientation, race, color, age, national origin, disability, veteran status, religion or any other legally protected characteristic.

Given the complexities of human interactions and relationships, it is impossible to produce a comprehensive list of all the behaviors that could be offensive to others and a violation of this policy. What may offend one person might not be bothersome to another. When you are considering whether a behavior (either yours or someone else's) could be considered to violate this policy, ask yourself the following questions.

- Could the behavior be offensive, unwanted, or uninvited?
- Could the behavior interfere with job performance?
- Could the behavior cause discomfort, humiliation, embarrassment, hurt feelings, or harm to an employee, customer, vendor, or visitor?

If you can answer "yes" to any one of these questions, the behavior likely violates our policy.

Unwelcome

Throughout this policy we talk about behavior being "unwelcome." Certain behaviors are so offensive and inappropriate that any reasonable person would consider them unwelcome. A person engaging in any such behavior at work is almost certainly violating this policy and is subject to discipline. Short of that, there are some behaviors, comments or conversations that one person might find offensive while another would not. We encourage employees who experience unwelcome behavior of this type to politely but clearly let the other person know the behavior is offensive to them. But for various reasons employees will not always be willing to do that, so all employees must be alert for unspoken indicators that a person has been offended. For instance, a person abruptly walking away from a discussion looking embarrassed, hurt, or offended, or another person quickly changing the subject of a discussion could both be offering non-verbal clues suggesting that they have been offended.

All employees are entitled to work in a non-threatening, professional, business-like environment, free of harassment. This means that all employees must be considerate of the feelings, points of view, and sensitivities of other employees, customers, vendors, and visitors.

How to Report Perceived Harassment and Unwanted Conduct

If you feel you are the recipient of unwanted conduct of the type described in this policy, you must report the behavior immediately to any of the following people.

- The Employee Relations Department
- Your supervisor or another department supervisor
- A member of the company's executive leadership team

You also are required to report any behavior you witness which you judge to be unwanted by or offensive to another employee - even if you do not feel personally offended by the behavior. You must also report any complaints or reports of harassment alleged to be committed by an employee that may be made to you by any other person, whether an employee, vendor, customer, etc. Reporting is not optional; all employees are expected to report all unwelcome, offensive behavior.

Investigations

Each time a complaint is made, North Risk Partners will undertake an investigation to determine if a violation of the policy took place. We cannot promise complete confidentiality because, by the very nature of the problem, other people must be interviewed during an investigation. You are assured, however, that the matter will be treated sensitively and that only the information necessary to conduct the investigation will be revealed and then only to those with a need to know. You are also assured that there will be no retaliation for reporting suspected harassment or unwanted, offensive conduct or for participating in an investigation. Whether a person's conduct violates this policy will depend on the individuals involved, their relationship, the conduct in question, the circumstances under which the behavior took place, whether the conduct was welcome to the recipient, and other circumstances as varied as the people who work with us.

If it is determined that inappropriate conduct has occurred, we will act promptly to eliminate the offending conduct, and we will take such action as is appropriate under the circumstances. Such action may range from counseling to termination of employment and may include such other forms of corrective action as we deem appropriate under the circumstances and in accordance with applicable law.

North Risk Partners recognizes that false accusations can have serious effects on innocent persons. If an investigation results in a finding that a person who has accused another of a violation of this policy has maliciously or recklessly made false accusations, the accuser will be subject to appropriate corrective action, up to and including termination.

In addition to the above, if you believe you have been subjected to sexual harassment, you may file a formal complaint with the appropriate government agency. Using our complaint process does not prohibit you from filing a complaint with these agencies.

What You Must Do to Prevent Harassment

Read this policy and know what it says. Live up to the letter and the spirit of the policy and encourage others to do the same. Specifically:

- Conduct yourself in a professional manner
- Report suspected harassment and unwanted, uninvited, unwelcome conduct as directed above
- Treat employees, vendors, customers, and visitors with dignity, sensitivity, and respect
- Participate in annual anti-harassment training through North Risk Partners.

If you have any questions at all about this policy or anything related to it, please speak with the Employee Relations Department, your supervisor, or a member of the executive leadership team.

SUBSTANCE ABUSE

North Risk Partners' substance abuse policy complies with federal and state laws and regulations. North Risk Partners believes every employee has the right to work in an environment free of hazards and our clients deserve reliable employees who will not introduce hazards to their workplace. North Risk Partners recognizes alcohol and drug abuse as potential health, safety and security problems. North Risk Partners expects all employees to assist in maintaining a work environment free from the effects of alcohol, drugs, or other intoxicating substances. Compliance with this substance abuse policy is a condition of employment.

Occasionally employees may find themselves at company functions where alcohol is available. Any employee who chooses to consume alcohol at these functions is expected to do so reasonably and moderately. Excessive consumption of alcohol while conducting company business or while attending company functions is prohibited. Employees who abuse alcohol in these instances can expect to face disciplinary action.

North Risk Partners prohibits employees from the possession, use, impairment by, sale, dispensation, distribution, purchase, or unlawful manufacture of un-prescribed drugs and intoxicants on North Risk Partners premises and from working under the influence of illegal substances or intoxicants during working hours.

Any violator of this substance abuse policy will be subject to appropriate corrective action, up to and including termination of employment.

WORKPLACE VIOLENCE PREVENTION

North Risk Partners is committed to preventing workplace violence and maintaining a safe work environment. We have adopted the following guidelines to deal with intimidation, harassment, or other threats of (or actual) violence that might occur during business hours or on our premises.

All employees, including supervisors and temporary employees, should be treated with courtesy and respect at all times. Employees are expected to refrain from fighting, "horseplay," or other conduct that may be dangerous to others. We prohibit firearms,

weapons, and other dangerous or hazardous devices and substances from the premises of North Risk Partners without proper authorization.

North Risk Partners will not tolerate conduct that threatens, intimidates, or coerces another employee, a client, or a member of the public at any time, including off-duty periods. This includes all acts of harassment, including harassment that is based on an individual's race, creed, color, ethnicity, national origin, religion, sex, sexual orientation, gender expression, age, height, weight, physical or mental ability, veteran status, military obligations, marital status or any other characteristic protected by federal, state, or local law.

All threats of (or actual) violence, either direct or indirect, should be reported as soon as possible to the Employee Relations Department. This includes threats by employees as well as threats by clients, vendors, solicitors, or anyone else. When reporting a threat of violence, you should be as specific and as detailed as possible.

Be sure to report any suspicious person or activities as soon as possible to the Employee Relations Department. Do not place yourself in peril. If you see or hear a commotion or disturbance near your work area, do not try to intercede or see what is happening.

The Employee Relations Department will promptly and thoroughly investigate all reports of threats of (or actual) violence and of suspicious individuals or activities. The identity of the person who made the report will be protected to the extent practical. To maintain workplace safety and the integrity of its investigation, North Risk Partners may suspend an employee, either with or without pay, pending investigation.

Any person who violates these guidelines will be subject to corrective action, up to and including termination of employment. Violations include making a threat of violence or actually committing a violent act.

If you are having a dispute or difference with another employee, we encourage you to discuss it with your supervisor or a member of the executive leadership team before the situation escalates into potential violence. North Risk Partners is eager to assist in the resolution of employee disputes.

POLICY PROHIBITING WEAPONS IN THE WORKPLACE

North Risk Partners is committed to providing its employees, contractors, clients, vendors, and other visitors with an appropriate and safe workplace environment. As a part of the process, North Risk Partners prohibits all employees from carrying, concealing, using, or storing any weapons or ammunition on North Risk Partners premises, vehicles, or a client's property.

Employees are also prohibited from carrying, concealing, using, or storing any weapon or ammunition at any time the employee is acting within the course and scope of his or her employment, regardless of whether the employee is on North Risk Partners premises or a

client's premises, or whether the employee is using a North Risk Partners provided vehicle. North Risk Partners "premises" includes all buildings, storage areas, work areas and outdoor lots. A "weapon" includes, without limitation guns, pistols, knives, clubs and any other item the purpose of which is to threaten or inflict bodily harm upon any person.

This policy applies, without limitation, to concealed weapons for which a valid permit has been issued and to all persons to whom a valid permit to carry a concealed weapon has been issued. An employee who has a valid permit to carry a concealed weapon may, when not acting within the course and scope of his or her employment, carry or possess that weapon in the parking area North Risk Partners provides for employees, but in no other location on North Risk Partners premises or a client's premises. Weapons other than concealed weapons for which a valid permit has been issued are prohibited in the employee parking area. Employees who violate this policy are subject to corrective action up to and including termination of employment.

North Risk Partners' policy banning weapons and ammunition from the premises also applies to non-employees, including those with proper licenses to carry a concealed weapon. Persons with lawful permits to carry guns may carry or possess the weapon in the parking areas provided by North Risk Partners, but in no other location on North Risk Partners' premises.

RECRUITMENT AND HIRING

North Risk Partners' primary goal when recruiting new employees is to fill vacancies with individuals who have the best available skills, abilities or experience needed to perform the work. Decisions regarding the recruitment, selection and placement of employees are made on the basis of job-related criteria.

When positions become available, qualified staff members are encouraged and are welcome to apply for the position. As openings occur, notices relating general information about the position are posted. The manager of the department with the opening will participate in interviews with applicants.

EMPLOYMENT AT-WILL

Employment at North Risk Partners is not for any definite period of time. Rather, employment is considered "at-will," meaning that either the employee or North Risk Partners may terminate the relationship at any time and for any reason not contrary to law. Two-week's notice prior to resignation, however, is customary as a matter of general business practice.

No representative of the company, except for the company CEO by express written agreement, has the authority to make representations or agreements with an employee that are contrary to the foregoing.

OPEN DOOR POLICY

North Risk Partners has an open-door policy to provide employees who have work-related problems, issues, complaints, or ideas with an opportunity to have them discussed. Employees should discuss any problem or issue with their immediate supervisor as soon as possible. If the problem or issue is not resolved, the employee should normally follow the appropriate "chain of command" and discuss the problem or issue with the supervisor's supervisor. Employees are also encouraged to contact their supervisor to inquire further about the open-door process or for resolution of personnel matters. For specific concerns regarding harassment or discrimination, an employee should contact the Employee Relations Department.

NEW EMPLOYEE ORIENTATION

The new employee orientation is designed to answer your questions and give you a good comfort level about your new job. This time is also used to complete forms to satisfy legal, statutory, and company policy requirements. Normally you will receive orientation within the first week of work.

Orientation will:

- Describe the background and history of North Risk Partners

- Outline the North Risk Partners' corporate philosophy, including values and corporate objectives
- Communicate key corporate policies, including but are not limited to Harassment, Confidentiality, Code of Business Conduct and email and internet usage
- Discuss the work schedule
- Give an overview of your paid time off benefits, including holidays as well as vacation and sick days
- Assist you to enroll in group benefits such as health insurance, life insurance, and the company's 401(k) plan

Your manager or supervisor will:

- Introduce you to your work area and team members
- Provide a tour of your office environment
- Make sure you have a thorough orientation of your workstation (e.g., telephone, voicemail, email, computer applications)
- Discuss the objectives of your role
- Create and communicate your training plans
- Identify your key contact for questions

It is our goal to make your time spent during onboarding and training a positive and rewarding experience.

PROFESSIONAL EDUCATION

North Risk Partners feels strongly about the professionalism of its staff. We encourage you to take advantage of educational opportunities in the insurance field or other areas that are directly related to your job duties and position.

Insurance Licensure

Holding an insurance license in property and casualty or life and health is a condition for employment in a client-facing role with North Risk Partners. A team member will be in a client-facing role only after his or her insurance license is obtained. North Risk Partners will pay all expenses associated with obtaining a license one time. If the exam is not passed after the first attempt, a job candidate will be responsible for the cost of obtaining their license. North Risk Partners allows a maximum of three attempts for passing the licensing exam. If the exam is not passed after three attempts, you may be terminated from employment with North Risk Partners.

Continuing Education & Designations

The company wants to have every employee, if applicable to their role, work toward certification in one or more of the available designations (e.g., CIC, CPCU, CLU, Risk

Management, and CISR). North Risk Partners will pay for continuing education classes concurrent with your license renewal. Below are the standard protocols North Risk will follow in relation the number of classes employees can take per year:

- The general rule is that North Risk Partners will pay for one continuing education class per licensing year; however, exceptions may be made.
 - North Risk Partners will allow you to take two classes in a licensing year while you are working towards a designation.
 - If you'd like to take more than two classes in the licensing year, you may need to pay for the class and any expenses associated with the class.
 - All classes beyond what is outlined above must be approved by your supervisor.
- In order to earn several of the industry's core designations, all corresponding exams must be passed within five years of passing the first exam. If your five-year clock is close to expiration, depending on the circumstances, the company may or may not pay for classes above and beyond what is outlined above.
- Employees should record time off for continuing education in the company's online recording keeping system (Paylocity) as "Professional Development".

Below are the standard protocols North Risk will follow in relation to payment and/or reimbursement of professional education:

- Payment will include your wages and expenses while at class.
- Employees should record time off for continuing education in the company's online recording keeping system (Paylocity) as "Professional Development".
- The cost of tuition will be paid up front or reimbursed by the company.
- You will be reimbursed for certain expenses incurred during professional development classes:
 - The cost of mileage and lodging will be reimbursed as it is incurred by the employee and submitted on an expense report at the end of the month.
 - Each day you will be allowed the following maximum for meals:
 - \$40 for a full day and
 - \$20 for a half day (i.e., \$10 for breakfast, \$10 for lunch).
 - This amount **MUST BE INCLUDED** on your expense reports and receipts will be required for the meals unless you're taking the per diem.

*Please see page 52 for additional information related to travel reimbursement.

You must have classes approved by management prior to registration. Other educational seminars and workshops may also be reimbursed. To receive reimbursement, prior approval must be obtained from management.

North Risk Partners expects all employees to conduct themselves with professionalism when attending classes and to use the dress code in this employee handbook as a guide. Jeans are acceptable attire at CIC and CISR classes.

ONGOING TRAINING

North Risk Partners may periodically conduct orientation and training programs. In order to keep you informed and up-to-date on changes that may affect your position, additional continuing education and/or training programs may be encouraged and/or required.

TRANSFERS AND PROMOTIONS

In an effort to match you with the job you are most suited for, and because of the dynamic and changeable nature of our industry, you may be transferred to another department from your current job. This may be either at your request or as a result of a decision by North Risk Partners.

Reasons for transfer may include but are not limited to: fluctuations in department workloads or production flow, more efficient utilization of personnel, increased career opportunities, personality conflicts, or other personal situations.

The management of North Risk Partners does reserve the right, however, to transfer or promote an employee without posting the availability of that position. Temporary transfers may be made at the discretion of North Risk Partners management.

Your eligibility for transfer or promotion is determined by the requirements of the new job. Another condition of transfer or promotion is satisfactory performance of your current job for a period of six months prior to your request for transfer. However, a transfer may take place within the first six months of employment if the management of North Risk Partners believes that it is in the best interest of North Risk Partners to make an exception to this guideline.

VERIFICATION OF EMPLOYMENT

The Employee Relations Department will handle verification of current and former employees of the company (usually for loan and credit purposes) as well as reference inquiries from other employers. Responses to such inquiries will generally be limited to confirming the dates of employment and positions held. Requests for additional information must be accompanied by a release from the employee. Individual employees should refer all reference checks to the Employee Relations Department.

EMPLOYMENT PRACTICES

PAY PERIODS AND PAYROLL DISTRIBUTION

Employees get paid semi-monthly with paydays on the 15th and last day of the month. The pay periods are the 1st – 15th and 16th – end of month. Commission-only employees have monthly pay periods with paydays on the 15th. There are 24 pay periods each year. You will have access to view your paystub, which includes a statement of earnings and deductions for the pay period. If a payday falls on a weekend or company-scheduled holiday, you typically will be paid on the last working day prior to the weekend or holiday.

If necessary, most payroll-related adjustments or errors will be corrected on the following paycheck. Contact the Payroll Department if there is a question regarding your paycheck.

New employees will need to provide financial institution information for electronic funds transfer of payroll amounts. Notify Payroll if there is a change in your financial institution for all direct deposits. North Risk Partners is not responsible for advancing additional payroll should an employee neglect to contact the company regarding an institutional change.

PAYROLL DEDUCTIONS

All mandatory deductions (and withholdings), such as federal income tax, Social Security, state, city and/or local income tax and disability, as applicable, as well as all authorized voluntary payroll deductions, such as for health insurance, other employee benefits and other deductions, as arranged with the company, will be withheld automatically from your paycheck. Deductions taken from your paychecks are for the same period as time worked.

HOURS OF WORK

The workweek is generally Monday through Friday with normal operating hours from 8:00 a.m. to 4:30 p.m. Employees working an eight-hour daily schedule are entitled to, and encouraged to take, an unpaid lunch break and two paid short breaks each day. The two paid short breaks may not be taken at the beginning or end of your shift. Breaks must be staggered throughout the day to ensure adequate office coverage. In addition, the two short breaks may not be combined for one longer break.

Your actual work schedule will depend upon your position. Not everyone will have the same schedule of workdays, work hours, and lunch breaks. You and your manager will agree on a schedule specific to your position. Any changes to your standard schedule must be approved in advance with your manager. In order to be responsive to business demands, schedules may need to be altered from time to time. Overtime may occasionally be required to meet business demands or deadlines.

OVERTIME

Overtime refers to time worked over the regular number of hours in a workweek. North Risk's workweek is recognized as Sunday through Saturday. The federal government, through the Fair Labor Standards Act (FLSA), recognizes a standard workweek as 40-hours long (it can be less than 40 hours if a company so chooses, but no longer), and when someone in a non-exempt position works more than 40 hours, that individual must receive special compensation for those extra hours. The law further dictates overtime be paid at a rate no less than 1.5 times the employee's normal hourly rate. Overtime requires pre-approval from your supervisor.

- "Exempt" means the job, or position, has been ruled exempt from the part of the Fair Labor Standards Act that requires employees be paid overtime. The Fair Labor Standards Act states "any employee employed in a bona fide executive, administrative or professional capacity..." is exempt from overtime pay.
- "Non-exempt" simply means the position must be paid overtime for hours worked beyond 40.

Only actual hours worked in a given workday or workweek will be applied in calculating overtime. Generally, holidays or paid time off are not considered hours worked for the purpose of calculating overtime pay.

REPORTING TIME WORKED

Non-exempt employees will report hours worked through an online timesheet. All requests submitted online are electronically routed to your manager for approval. Please remember, working overtime must be approved in advance by your manager. Any work performed for the company away from the office must also be recorded on the timesheet if you are a non-exempt employee.

Each employee must record his or her own time. No employee may record time for another employee. Supervisors, the Employee Relations, and Payroll Departments are the only authorized employees to modify the time record of another employee. Each employee must ensure that his or her time record is complete and accurate. If an employee identifies an error in the time record, the employee must contact their supervisor to report the error. The employee's supervisor must approve the corrected time record. Any errors in the employee's time record must be reported as soon as possible. Falsification of time records will result in disciplinary action up to and including termination of employment.

ADVERSE WEATHER CONDITIONS

The company opens and closes at the normal working hours regardless of weather conditions. While it is anticipated that most employees will report to work on such occasions, no employee is to endanger their personal health and safety by doing so.

Management should determine whether or not a day will be considered an “Adverse Weather Day” and consequently if it is an excused or an unexcused absence.

PERSONAL BUSINESS DURING WORK TIME

The need to conduct personal business while at the office will arise on occasion, and employees should feel free to discuss this need with their supervisors. However, communications other than those involving the company, including mail, visitors, and phone conversations, should be kept to a minimum. Visitors to the office should be told to stop at the reception desk in the lobby, and the employee being contacted should meet the visitor in the lobby and accompany them throughout the office.

PUNCTUALITY AND ATTENDANCE

Good attendance and punctuality are essential for the efficient operation of North Risk Partners. All employees are expected to arrive at work on time for each scheduled day of work. If an employee is going to be late or absent, the supervisor should be notified as soon as possible, but not later than the employee’s scheduled start time. Notification is to include the reason for the absence and an indication as when the employee expects to arrive or return to work. If the employee’s supervisor is unavailable when the employee calls, a message including the phone number where the employee can be reached is to be left with another member of the company, preferably someone within the same department.

You are expected to be at your workstation at the beginning of each business day. Regular delays in reporting to work will result in disciplinary action and/or loss of pay for the time not worked.

GENERAL RULES OF CONDUCT

To assure orderly operations and provide the best possible work environment, North Risk Partners expects employees to follow rules of conduct that will protect the interests and safety of all employees and North Risk Partners. Above all, employees are expected to treat coworkers and clients courteously and are responsible for maintaining positive, productive relationships. Any actions or behavior which may be offensive to coworkers or may jeopardize customer relations are strictly forbidden.

While it is not possible to list all of the forms of behavior that are considered unacceptable in the workplace, the following is a nonexclusive list of examples of infractions of rules of conduct that may result in corrective action, up to and including termination.

- Carelessness which results in damage or injury to North Risk Partners property or employees

- Coercion of, threats against, intimidation of, interference with or abuse of other employees
- Discourteous treatment of coworkers, management, customers, suppliers or an individual where contact is in the capacity of an employee of North Risk Partners
- Dishonesty or falsification of records
- Failure to follow instruction from your direct supervisor, executive leadership, or the Employee Relations Department
- Expressing defiance, general insubordination, or other disrespectful conduct to your direct supervisor, executive leadership, or the Employee Relations Department
- Failure to adhere to policies and procedures as outlined in this handbook
- Failure to report for work, being tardy, sleeping, loitering, loafing, excessive visiting, abuse of rest periods, wasting time or failing to expend the necessary effort in the performance of the work assignment
- Harassment of or discrimination against another employee, customer or any other person where contact is a result of the employment relationship with North Risk Partners
- Making or publishing false or malicious statement about employees or North Risk Partners
- Possession or use of weapons on North Risk Partners property
- Theft or inappropriate removal or possession of property
- Transporting, possessing, transferring, using or being under the influence of intoxicating beverages or controlled substances at any time, including while en route to work
- Unauthorized disclosure of confidential information
- Unauthorized release or disclosure of business or customer information

JOB PERFORMANCE

Each and every employee contributes to the success or failure of North Risk Partners. We expect everyone to perform to the highest level possible. Poor job performance can lead to corrective action up to and including termination of employment.

Because our employee's performance is vital to our success, North Risk Partners conducts annual reviews during an employee's anniversary month evaluating individual performance. We hope that through these reviews, our employees will learn what we expect of them and we will learn what they expect of us. We require all employees to participate in the review process when it occurs. Failure to participate could lead to corrective action up to and including termination of employment.

A performance review does not always result in an automatic salary increase. The employee's overall performance and salary level relative to a position's responsibilities must be evaluated to determine whether a salary increase is warranted. If warranted, compensation adjustments

will be applied to the first full pay period following an employee's anniversary. Out-of-cycle salary increases must be preapproved by the company's CEO or CFO.

Progressive Discipline

Any employee conduct that violates North Risk Partners policies or that, in the opinion of North Risk Partners, can interfere or adversely affect our business is sufficient grounds for corrective action. Corrective action can range from coaching to immediate discharge. Our general policy is to take corrective steps in the following order.

- Verbal warning(s)
- Written warning(s)
- Termination

North Risk Partners reserves the right to alter the order described above, to skip corrective steps, to eliminate corrective steps or to create new or additional corrective steps depending on the facts and severity of each individual case. In choosing the appropriate corrective action, management may consider any number of factors, including severity of conduct, history of misconduct, employment record, length of employment, strength of evidence against the accused, ability to correct the conduct, attitude about the conduct, actions taken for similar conduct by other employees, how the conduct affects the company, its clientele and employees, and other factors related to the nature of the misconduct.

You should remember that your employment is at the mutual consent of you and North Risk Partners. This policy does not change your employment-at-will status.

CONFLICTS OF INTEREST

As an employee of North Risk Partners, you are representing us, and we request you conduct yourself with the highest degree of loyalty and personal integrity. Business dealings that appear to create a conflict between the interests of North Risk Partners and an employee are unacceptable. North Risk Partners recognizes the right of employees to engage in activities outside of their employment which are a private nature and unrelated to our business. However, the employee must disclose any possible conflicts so that North Risk Partners may assess and prevent potential conflicts of interest from arising.

Although it is not possible to specify every action that might create a conflict of interest, this policy sets forth the ones which most frequently present problems. If an employee has any question whether an action or proposed course of conduct would create conflict of interest, he or she should immediately contact their supervisor to obtain advice on the issue. The purpose of this policy is to protect employees and the company from any conflict of interest that might arise.

A violation of this policy will result in appropriate corrective action, up to and including termination.

Outside Employment and Activities

Our expectation for full-time employees is that your primary job responsibility is to the company. Any outside employment or other source of income or activity must not interfere with the expected performance of your duties and responsibilities to the company, nor should they affect your objectivity, independence, or loyalty. You should also not engage in any outside activity that might embarrass or bring discredit upon North Risk Partners. You are prohibited from working in any capacity with one of our competitor or suppliers. We ask that you disclose all outside employment to your supervisor. The purpose of this to ensure you are not working for a customer and working on their account. You are also not permitted to conduct outside business affairs during the company working hours or in the company facilities.

Hiring of Relatives

Usually North Risk Partners will not refuse to hire someone simply because he or she is related to one of the company's current employees. There are times however, when employing relatives is inappropriate and has the potential to affect the morale of other employees and to create conflicts of interest for the relatives involved. Therefore, we will not hire relatives of our current employees where one relative will have to supervise the other. If two employees become related while working for North Risk Partners, and if one of them is in a position of supervision over the other, only one of the employees will be allowed to keep his or her position. The other will have to transfer to another position or leave North Risk Partners.

Under this policy, the term "relatives" encompasses husbands, wives, live-in partners, domestic partners, parents, grandparents, children, grandchildren, siblings, in-laws, cousins, aunts, and uncles. This policy covers biological relationships, marriage relationships and step relationships.

Personal Office Relationships

We prohibit individuals in supervisory capacities from having romantic relationships with subordinates. These relationships can result in conflicts of interest, allegations of favoritism, or potential charges of sexual harassment. Any such relationship must be disclosed to the Employee Relations Department. The Employee Relations Department will assess the situation and make a recommendation to resolve any actual or potential conflict or impropriety created. This may include transferring one of the employees to another department.

Entertainment

We recognize there will be instances in the normal course of business relationship-building when it may be appropriate for you to accept invitations that would include joining a current or

prospective business partner in meals, entertainment, or other activities considered social or recreational in nature. In such instances, business can be discussed, and valuable relationships can be developed or maintained and thus be in the company's best interest. Your good judgment should govern the acceptance of such invitations. If you have any question as to the appropriateness of an invitation, you should discuss the matter with your manager or supervisor.

Gifts

Accepting gifts, defined as goods, services, discounts, etc., valued at more than \$150 (singly or in aggregate) from a third-party doing business with the company must be communicated to management.

Personal Transactions

While it is not a violation for you or your immediate family to be a client of the company or any of its affiliates, you may not use your position to underwrite a policy, pay a claim, or otherwise process or influence any transaction in which you have a personal interest.

CONFIDENTIALITY

Maintaining the confidentiality of all the information you come in contact with during your employment with the company is of utmost importance.

Nonpublic Personal Information

Working for an insurance agency brings employees into contact with a wide variety of information about insureds and applicants for insurance. Much of this information is nonpublic personal information and must be considered and treated as confidential information.

Examples include but are not limited to:

- Claims information
- Credit history
- Scheduled personal property,
- Home address, phone numbers, etc.

Employees are reminded that we are provided this information for business use only. This information is not to be used by any employee except in fulfilling his or her business responsibilities. Nor is this information to be shared with anyone except other employees, vendors and affiliates, all of whom must have a legitimate business need for such information in providing a service to the company as it respects clients or consumers, or as required by law pursuant to a facially valid subpoena or other court order.

Improper use or disclosure is not permitted by law and is contrary to company policy. Any employee who violates this policy is subject to discipline, up to and including termination of employment.

Confidential, Proprietary Information

All information concerning the insurance written through North Risk Partners, including but not limited to driving records, medical information (subject to HIPAA regulations), expiration data in connection therewith, client identities, policy terms, conditions and rates, financial data, familiarity with client risk characteristics and information concerning insurance markets for particular risks, (collectively "Confidential Information") is confidential and proprietary and shall be treated as such by the employee.

In addition, all the company's records and files maintained in any form or format documenting Confidential Information and any other information owned by the company (collectively "Agency Records") is also proprietary, protected property of the company which is and shall remain the property of the company exclusively. An employee shall not directly or indirectly make use of Confidential Information or Agency Records for his or her own benefit nor divulge Confidential Information or Agency Records except to the company or its representatives, or pursuant to company agreements with insurers to which the company is a party and as otherwise required by law.

Employees who are unsure about the confidential nature of specific information must ask their supervisor for clarification.

Employees who improperly use or disclose trade secrets or confidential business information will be subject to corrective action, up to and including termination of employment and legal action, even if they do not actually benefit from the disclosed information.

Individuals no longer employed by North Risk Partners may be subject to legal action for disclosure of any proprietary information prior to that information becoming public information through appropriate channels.

EMPLOYEE CLASSIFICATIONS

Employees are classified as either exempt or non-exempt for pay administration purposes as determined by the Fair Labor Standards Act (FLSA). The definitions of the worker classification categories can be summarized as follows:

EXEMPT

Management, supervisory, professional, sales, or administrative employees whose positions meet FLSA standards are exempt from overtime pay requirements.

NON-EXEMPT

Employees whose positions do not meet the FLSA exemption standards are paid overtime. Employees classified as non-exempt generally work in non-supervisory or non-professional role.

In addition, each employee's status is defined as one of the following:

FULL-TIME

Employees who work a minimum of 40 hours per week are full-time. Such full-time employees are eligible for benefits after applicable requirements for length of service have been met.

North Risk Partners supplements its regular work force with temporary or part-time employees to help compensate for workload, employee absences, or other situations. Management will determine which positions are regular part-time and which are considered temporary or seasonal.

PART-TIME

Employees who work less than 40 hours per week are non-exempt and considered to be part-time. Employees working less than 40 hours, but more than 30 hours are still eligible for benefits after applicable requirements for length of service have been met.

Employees who work 30 hours or less per week, or who work on a temporary project basis, will receive all legally mandated benefits (such as Workers' Compensation and Social Security benefits), but are ineligible for all other benefit programs described in this handbook.

TEMPORARY

Temporary employees are those engaged to work either part-time or full-time on the North Risk Partners' payroll, but have been hired with the understanding that their employment will be terminated no later than upon their completion (at the discretion of North Risk Partners) of a specific assignment. This category includes interns. Such employees may be either "exempt"

or “non-exempt” but are not eligible for North Risk Partners benefits except as mandated by law.

If your status changes from temporary or part-time to full-time, you are considered hired on the date you become a full-time employee for purposes of calculating eligibility for benefits that require full-time employment for eligibility purposes.

BENEFITS AND LEAVE TIME

Eligible employees at North Risk Partners are provided a wide range of benefits that we feel are attractive and competitive in our marketplace. These benefits are designed to assist you in meeting the financial burdens that can result from illness and disability and to help you plan for retirement. Your eligibility for benefits is dependent upon a variety of factors, including your employment classification, time with the company, and more.

Final determination of eligibility and benefits will be made in accordance with actual plan descriptions, insurance handouts, or legal documentation which describes the plans or policy. These are available to you during the enrollment process, posted on the company intranet or the human resources and payroll system (Paylocity).

North Risk Partners reserves the right to amend, modify or terminate, in whole or in part, any or all of the provisions of the benefit plans described. The company reserves the right to administer, apply and interpret the benefit plans described, and to decide all matters arising in connection with the operation or administration of such plans.

The following benefits are allowable to employees.

HOLIDAYS

The company observes the following holidays for regular full-time employees with paid time off.

- New Year's Day
- Good Friday*
- Memorial Day
- Independence Day
- Labor Day
- Veterans Day**
- Thanksgiving
- Day after Thanksgiving
- Christmas Eve***
- Christmas Day

*On Good Friday, North Risk offices will close at 12:00 p.m. Team members will receive holiday pay for the remainder of the day.

**All team members who are Veterans will receive Veterans Day off each year. The office will remain open for all other team members.

***When Christmas Eve falls Monday – Thursday team members will receive that day as a holiday. When Christmas Eve falls on a Friday – Sunday, North Risk will close at 12:00 p.m. the workday before and team members will receive holiday pay for the remainder of the day.

Holidays occurring on Sunday are observed the following Monday; those falling on Saturday are observed the previous Friday.

Regular office hours will be maintained prior to a holiday. Employees who are in a non-pay status the day before or after a holiday will not receive pay for the holiday without their supervisor’s approval. When an employee terminated in a week that includes a holiday, the effective date of the termination is the last date actually worked. Employees who terminate prior to a holiday are not paid for that holiday.

PAID TIME OFF

Paid Time Off (PTO) provides eligible employees with paid time away from work that can be used for vacation, personal time, sick leave, or time off to care for dependents. PTO must be scheduled in advance and have supervisor approval, except in the case of illness or emergency.

North Risk’s PTO calendar year will be defined as: February 1 – January 31.

Regularly scheduled employees working more than 30 hours per week are eligible for Paid Time Off (PTO). Temporary employees are not eligible for PTO regardless of the number of hours they work per week. PTO balance is determined by the years of service a team member will reach in the PTO calendar year. Please see the below chart.

Years of Service	No. of PTO days/year
0	15
1	17
2	18
3	19
4	20
5	21
6	22
7	23
8	24
9	25
10	26
11	27
12+	28

** Part-time employees working 30 hours or more per week, will receive a pro-rated amount based on years of service and the scheduled hours of work listed in the payroll system.*

** Team members who join North Risk through acquisition will receive PTO days based on their original date of hire with their former agency.*

*** New hires or acquisitions who join after Feb. 1 will receive a pro-rated number of PTO hours based on their hire date with North Risk.*

Requesting and Using PTO

Employees may request and use PTO in half hour or hour increments. Employees are invited to express their preference for PTO; however, PTO can be used only with the prior approval of the employee's supervisor. In requesting use of PTO employees are expected to comply with the company's scheduling procedures.

In considering PTO requests, supervisors will review the workload and the need for the employee to be available for work and may be denied based on business and staffing needs. Should a conflict arise between two or more employees requesting the same days off, the supervisor will consider factors such as need, date of the requests, and length of service in determining the employee who will get first choice. Except for sudden emergencies, employees are expected to give one week's advance notice for short PTO periods of up to one or two days and are expected to give two weeks' notice for longer periods.

PTO periods of longer than two weeks require the approval of an employee's supervisor and the Employee Relations Department.

For a sudden emergency or unplanned need, employees must notify their supervisor (or have a designated individual contact their direct manager on their behalf) prior to the start of their normal working hours, if possible.

Employees will still be held accountable for productivity, performance, and any quarterly/annual goals. If employees are unable to meet performance expectations due to attendance, supervisors may deny future requests until performance expectations are met.

PTO will be paid at the employee's rate of pay and is not part of any overtime calculation.

If a holiday falls within the employee's PTO period that day is not deducted from PTO.

Unpaid Time

Available PTO hours must be used prior to an employee taking unpaid time. Unpaid time up to five working days may be taken with prior approval of the Employee Relations Department and the employee's immediate supervisor.

Termination

Employees have the ability to use their available PTO balance at the beginning of North Risk's PTO calendar year; PTO hours are frontloaded on Feb. 1. For the purpose of PTO payout at

time of termination, PTO hours will accrue on a monthly basis on the backend of North Risk's payroll system, Paylocity.

At the time of termination, an employee will be paid out only for the accrued but unused PTO hours. The payout will be calculated based on the date and month in which they terminate. Terminations with a final date of employment prior to the 16th do not accrue PTO hours for that month. Terminations with a final date of employment on or after the 16th will accrue PTO hours for that month.

PTO payout maximum is 80 hours. Any accrued but unused PTO hours exceeding 80 hours will be forfeited.

PTO compensation is paid at the employee's last rate of pay and is included in the final paycheck.

Applicable state laws will supersede this provision.

Carryover

Up to one week (40 hours) of unused PTO may be carried forward to the next PTO calendar year. Employees who work less than 40 hours a week will have a prorated PTO carryover limit based on their hours worked per week. Employees will not be compensated for PTO days that exceed the allowable carryover days. Those days will be forfeited or can be donated to a PTO donation request. Applicable state laws will supersede this provision.

Leave of Absence

When on an approved leave of absence, the employee will continue to earn PTO. While PTO benefit will continue to accrue, PTO can run concurrently with certain approved leaves of absence. PTO may be used concurrently with FMLA but may not be used when on a paid disability leave.

Personal Time

North Risk Partners allows employees to use personal time to tend to obligations that arise during scheduled work hours. Employees may make up, up to two hours of personal time within a calendar week. Personal time requires prior approval from management.

STATE-SPECIFIC PTO POLICIES AND PROCEDURES

Nebraska

In accordance with the state of Nebraska, North Risk Partners will abide by Nebraska's PTO regulations for employees within this state. Employees in Nebraska will accrue PTO each pay

period based on the PTO schedule listed in this handbook; however, employees in Nebraska will cap out at a maximum of 100 PTO hours. Employees must use PTO prior to accruing any additional PTO once 100 hours has been accrued.

PTO will carryover from year to year not to exceed the 100-hour maximum cap. All PTO will be paid out upon termination in compliance with state regulations.

North Dakota

If an employee separates from employment, North Risk Partners will comply with applicable state laws regarding the payment of PTO at the time of resignation.

PAID TIME OFF DONATION PROGRAM

North Risk Partners offers a Paid Time Off (PTO) Donation Program, which enables employees to donate PTO to individuals in need. When an employee is on an approved leave of absence due to a medical condition or a major disaster, they may complete a PTO Donation Request Form and submit it to the Employee Relations Department. Requests should be submitted to the Employee Relations Department within 14 days of the approved leave of absence. Requests submitted outside of the 14-day time period may not be approved.

Upon approval of the request, the Employee Relations Department will review and send an email to the applicable division or team stating the employee's name and the total number of hours they are requesting. All other information will be kept confidential and in compliance with HIPAA and ADA. The Employee Relations Department will only send one email for each PTO request.

Team members will be able to donate their PTO to the specific individual in need at the time of a request. Team members will only be able to donate a maximum of up to half of their current balance for each request. If we reach the total amount of requested hours, no additional donations will be accepted.

Once each PTO calendar year, the Employee Relations Department will hold a PTO Donation period for team members to donate PTO to the general PTO donation pool. PTO that is donated to the pool will be distributed to recipients on an approval basis at the discretion of the Employee Relations Department. PTO donated to the PTO pool may not be claimed as an expense, tax deduction or charitable contribution by the donor employee and may not be reclaimed. PTO will be paid out at the recipient's rate of pay, regardless of the rate of pay of the donor.

Employees who meet the required criteria may request PTO from the donation pool. The recipient of PTO from this pool must exhaust all their PTO prior to receiving this benefit. Recipients will receive a maximum of 12 weeks of paid leave at his/her current rate of pay and in accordance with normal pay cycles; lump sum payments will not be made. Additionally, all

paid leave granted to the recipient employee is considered wages and is subject to the Federal Insurance Contributions Act (FICA) withholding, Federal Unemployment Tax Act (FUTA) withholding and any other required tax withholdings.

VOLUNTEER PAID TIME OFF

The intention of Volunteer Time Off (VTO) is to support employees in their interests and participation in community events. North Risk Partners recognizes that participating in these sorts of activities enriches the lives of its employees.

North Risk Partners provides employees VTO to support a charity of their choice. Full-time employees will receive 24 hours (three days) and part-time employees will receive eight hours (one day) of VTO per calendar year. This time is to be used specifically toward supporting a 501c3 charitable organization(s). VTO is separate from personal, vacation, and sick days taken as PTO, however it will be considered paid time off. The pay rate will be the employee's current base salary on the day(s) the time is taken. VTO may be used during standard business hours only.

Time off is refreshed at the beginning of each calendar year, unless the program is amended or discontinued, and does not accrue from year to year. This time is not eligible for payout at termination.

PARENTAL LEAVE PROGRAM

North Risk Partners values family and believes it is important for mothers to recover after giving birth and for both mothers and fathers to spend quality time with their new child without worrying about financial hardship. Upon being employed two years with North Risk Partners, full-time team members will be eligible for paid maternity and paternity leave as outlined below. Eligible employees will be granted leave once during a rolling 12-month period. Employees working less than 40 hours each week will receive a prorated amount of leave based on their actual hours worked.

Recovery Leave: Mothers giving birth to a newborn child will be eligible for two weeks of 100% paid leave for recovery.

Bonding Leave: Mothers and Fathers who have their own child or are experiencing the placement of a child in connection with adoption or foster care, will be eligible for two weeks of 100% paid leave for bonding.

*Mothers who give birth are eligible for two weeks of recovery leave and two weeks of bonding leave.

Paid leave under this policy must be used within the first sixteen weeks of birth or placement of a child. Paid leave under this policy will run concurrent with FMLA leave on a rolling 12-month calendar. Leave under this policy will be paid at your current rate of pay while on leave.

BEREAVEMENT LEAVE

The purpose of bereavement leave is to plan, arrange, and attend memorial services for deceased loved ones.

- Up to five days of bereavement leave will be provided to an employee when an employee's spouse/domestic partner or child passes away.
- Up to three days of bereavement leave will be provided to an employee when there is a death in the employee's immediate family.
- Up to one day of bereavement leave will be provided to an employee when there is a death of a close relative that is not immediate family.

For purposes of this policy the following definitions apply:

- Domestic partner is defined as a committed relationship where the couple is living together and has been together for 7+ years but is not legally married.
- Immediate family is defined as a parent/legal guardian, sibling, grandparent, or grandchild.
- A close relative is defined as aunts, uncles, nieces, nephews, or other nontraditional family relationships in which a strong personal relationship history denotes a close connection between the employee and the deceased.
- Step relatives and in-laws are included in the definition of all family relationships listed above.

Should additional time be needed, the employee may request additional time from his or her supervisor and the Employee Relations Department.

SUMMER FLEX

Summer Flex Hours give employees an option to work a flexible work schedule during the summer. This is an employee benefit offered to full-time employees. During Memorial Day through Labor Day, employees may work extra hours to leave up to 4 hours early on their Flex Day. Employees must meet eligibility requirements and participation is at the discretion of the employee's supervisor.

REFERRAL PROGRAM

North Risk Partners has implemented the #oneTEAM Referral Program. Eligible team members may be awarded a referral bonus of \$750 (less taxes) if they refer a candidate and the referral is

hired and remains and employee. Referral bonuses will be awarded to referring team members in two increments following the referred team members start date: \$250 after six months of employment and \$500 after one full year of employment of the referred employee. Both employees must be in good standing at time of bonus payment.

JURY DUTY LEAVE

North Risk Partners realizes that it is the obligation of all U.S. citizens to serve on a jury when summoned to do so, and employees will be allowed time off to perform such civic service as required by law. Employees are expected, however, to provide North Risk Partners with proper notice of your request to perform jury duty and verification of service. You also are expected to keep management informed of the expected length of your jury duty service and to report to work for the major portion of the day if you are excused by the court. If the required absence presents a serious conflict for management, you may be asked to try to postpone your jury duty.

WITNESS LEAVE

An employee called to appear as a witness will be permitted time off to appear, but without pay. Employees will be permitted to use paid time off when appearing as witnesses.

VOTING LEAVE

North Risk Partners encourages all employees to vote. Individuals who wish to express their right to vote are asked to work with their supervisor to determine a voting time if applicable time before or after work is not available. An employee who is a registered voter who does not have three consecutive hours in the period between the time of the opening and closing of the polls during which (s)he is not required to be present at work is entitled on Election Day to be absent from employment for such a period of time as well, in addition to his/her non-working time, total three consecutive hours between the time of opening and closing of the polls. North Risk reserves the right to specify the hours during which the employee will be absent to vote. In accordance with state regulations, North Risk will not deduct wages for those within compliance of this policy.

MILITARY SERVICE LEAVE

Employees serving in the reserve or National Guard may take unpaid military leave, as needed, to enable them to fulfill their obligations as reservists or Guard members. Employees may use paid time off for this purpose.

MILITARY LEAVE

North Risk Partners will grant unpaid Military Leave to employees who are absent from work because they are serving in the U.S. uniformed services in accordance with the Uniformed Services Employment and Reemployment Rights Act (USERRA). You are required to give your supervisor advance notice of upcoming military service, unless military necessity prevents advance notice or it is otherwise impossible or unreasonable.

Continuation of health insurance benefits is available as required by USERRA based on the length of the leave and subject to the terms, conditions, and limitations of the applicable plans for which you are otherwise eligible.

When you return from Military Leave, you will be reinstated to your previous position or a position of like seniority, status and pay you would have attained if you had remained continuously employed. For the purpose of determining benefits that are based on length of service, you will be treated as if you had been continuously employed.

If you have questions about Military Leave, contact the Employee Relations Department for more information.

FAMILY MILITARY LEAVE

North Risk Partners will grant an unpaid leave of absence of up to 10 working days to qualified employees under the following conditions.

Employee's immediate family member is a member of the armed forces and has been injured or killed while engaged in active service

Employee's immediate family member has been ordered into active service in support of a war or other national emergency

Immediate family member includes parent, child, grandparents, spouse or siblings.

The employee should give North Risk Partners as much notice as practicable to take a leave under this policy.

Per COBRA guidelines, the employee or his or her dependents will be responsible for the full cost of the plan.

FAMILY MEDICAL LEAVE

General Provisions

Employees of North Risk Partners, after the completion of one year of employment and 1250 hours, may be granted up to twelve weeks of unpaid leave for:

- The birth of a child and to care for such child or for a child newly placed with the employee through adoption or foster care
- The care of the employee's seriously ill current spouse, child, or parent (or up to 10 business days of family military leave to care for a service member with a serious injury or illness)
- A serious health condition which makes the employee unable to perform his or her job duties

The employee must have worked for North Risk Partners for 12 months or 52 weeks and have worked at least 1,250 hours during the 12-month period immediately before the date when the leave is expected to begin. The principles established under the Fair Labor Standards Act (FLSA) determine the number of hours worked by the employee. The FLSA does not include time spent on paid or unpaid leave as hours worked. Consequently, these hours of leave should not be counted in determining the 1,250 hours eligibility test for an employee under FMLA.

If spouses are both employed by North Risk Partners, the maximum combined total is 12 weeks during a rolling 12-month period for the birth or adoption of a child or to care for a seriously ill parent. Each spouse is allowed 12 weeks in a rolling 12-month period due to serious illness of themselves, their spouse, or their child.

An eligible employee who is a covered service member's spouse, child, parent, or next of kin may also take up to 26 weeks of FMLA leave in a single rolling 12-month period to care for the service member with a serious injury or illness.

Notice of Request for Leave

In order to have an absence considered leave, an employee must notify the Employee Relations Department and their supervisor 30 days prior to the absence if possible.

If circumstances do not permit a 30-day notice, the employee must notify the Employee Relations Department and their supervisor of the absence as soon as practicable. An employee's entitlement to leave for the birth or placement of a child must take place within 12 months after the birth or placement and be completed by the end of the rolling 12-month period.

Certification

When leave is requested either to care for an employee's seriously ill family member or due to a personal serious health condition that makes the employee unable to perform the functions of his or her job, a proper medical certification from a health care provider must be furnished to the Employee Relations Department for the leave to be approved. North Risk Partners may request a second and possibly third medical opinion at North Risk Partners' expense. The employee may also be required to provide re-certifications from the health care provider.

Continuation of Health Care Benefits During Leave

North Risk Partners will continue to provide medical insurance benefits during FMLA leave to eligible employees. Employees will be required to continue any premium contributions that may apply to continue active health, dental, vision and other voluntary insurance coverage. Premium contributions are due the 1st of each month. If FMLA leave is paid or covered by North Risk Partners' Short-Term Disability, the premiums will continue to be deducted from your paycheck. Employees will be required to submit payment to North Risk Partners for benefits when not receiving compensation from the company. Please coordinate with the Employee Relations Department in advance to determine and plan for premium contributions while on leave.

If an employee elects not to return to work for reasons other than a continued serious health condition, they will be responsible for reimbursing North Risk Partners for the applicable medical insurance premiums paid by the company on their behalf during the leave.

PTO Use During FMLA

FMLA leave is unpaid leave, except for Risk Advisors. Risk Advisors on FMLA will continue to receive their commission each month. Company policy requires employees to use any paid leave (PTO) available to them as part of their 12 weeks of FMLA leave. Three days of PTO may be retained for future utilization after the FMLA leave has been completed.

Returning to Work After Leave

Upon returning to work from Family Medical Leave, employees who were absent due to their own serious health condition must present a fitness for duty certification from their health care provider stating they are able to return to work. Once it is demonstrated that an employee is able to return to work, he or she will be reinstated to their previous or an equivalent position.

To help us plan for your return from leave, we request at least a two-week notice before your expected return date. When you return from medical leave, you will be reinstated to your position unless that job is no longer available. If it is not available, you will be placed in an equivalent position for which you are qualified.

If you do not report back to work within three days at the end of a medical leave, we will assume you have resigned.

WORKING PARENT RIGHTS

Pregnancy Accommodations

North Risk Partners will provide reasonable accommodations to an employee for health conditions related to pregnancy or childbirth if she so requests, with the advice of her licensed health care provider or certified doula, unless doing so would impose an undue hardship on the

company. "Reasonable accommodation" may include, but is not limited to, temporary transfer to a less strenuous or hazardous position, seating, more frequent restroom, food and water breaks, and limits to heavy lifting.

At a minimum, North Risk Partners will offer the following accommodations to the pregnant employee without requiring them to seek advice of her licensed health care provider or certified doula: more frequent restroom, food and water breaks; seating; and limits on lifting over 20 pounds.

North Risk Partners will not retaliate against an employee for requesting or obtaining accommodation under this section. Further North Risk Partners shall not require an employee to take a leave or accept an accommodation.

Nursing Mothers

North Risk Partners complies with federal and state regulations allowing employees who need to express breast milk for infant children reasonable break time. If possible, the employee's break time will run concurrently with any other break time already provided to the employee. North Risk Partners will make reasonable efforts to provide a room or other location that is shielded from view, free from intrusion from coworkers and the public and includes access to an electrical outlet for the employee to express her milk in privacy. The room utilized will not be a bathroom.

North Risk Partners will not retaliate against an employee for asserting her rights under this statute.

BONE MARROW DONOR LEAVE

An employee who works an average of at least 20 hours per week is eligible for this leave. Team members may request leave to serve as a bone marrow donor if you are a match to someone needing the donation. Notify the Employee Relations Department and your supervisor that you need to take leave at least 30 days before the procedure is scheduled to take place. Written medical certification of the need for leave is also required.

Bone Marrow Donor Leave will be paid and may last up to 5 days, including any time needed for testing before the procedure. Leave will not generally be granted more than once in a rolling 12-month period.

North Risk Partners will not retaliate against you for requesting or obtaining a Bone Marrow Donor Leave.

PERSONAL LEAVE

North Risk Partners will consider a request from an eligible employee to take an unpaid Personal Leave to fulfill personal obligations. Employees become eligible for personal leave 90 days after their hire date.

In order for us to give your leave request adequate consideration, we ask that you submit the request in writing to your supervisor and the Employee Relations Department as far in advance as possible.

An eligible employee may not take more than 30 calendar days of Personal Leave every two years. We will also consider a written request for a single extension of no more than 10 calendar days. With supervisor and the Employee Relations Department's approval, you may include available paid time off as part of your Personal Leave period.

We will give each request individual consideration. The decision to approve a Personal Leave will be based on a number of business factors such as anticipated workload needs and staffing considerations during the proposed absence.

Subject to the terms, conditions, and limitations of the applicable plans, North Risk Partners will provide health insurance benefits until the end of the first full month of an approved Personal Leave. At that time, you will become responsible for the employer portion of those benefits in order for coverage to continue. When you return from Personal Leave, North Risk Partners will resume providing those benefits according to the applicable plans.

When a Personal Leave ends, we will make every reasonable effort to return you to the same position if it is available or to an available similar position for which you are qualified. However North Risk Partners cannot guarantee reinstatement in all cases.

If you do not report to work within three days at the end of a Personal Leave, we will assume you have resigned.

CRIME VICTIM LEAVE

Eligible employees may take a reasonable leave to appear as a witness, to consult with a district attorney, or to exercise certain other rights under the law. Employees who are crime victims or who are subpoenaed as witnesses at criminal proceedings must provide North Risk Partners with at least one day's notice before taking the leave. North Risk Partners will not discharge or penalize any employee who exercises his or her right to take such leave. Crime Victim Leave will be unpaid, but employees may utilize PTO.

DOMESTIC VIOLENCE LEAVE

North Risk Partners will provide a reasonable leave to employees whom are victims of domestic violence. Leave will be allowed to seek medical attention, obtain counseling, legal services, or

to take action to increase safety. Leave may be taken for oneself or their child whom is a victim. This leave will be unpaid, but employees may utilize their PTO.

Employees must provide reasonable advance notice of the leave where feasible. When advance notice is not feasible, the employee must provide a certification if requested. The certification must be in the form of a police report, a court order or other evidence that the employee appeared in court, or documentation from one of several specified counseling or medical professionals.

CONTINUATION OF MEDICAL COVERAGE INSURANCE (COBRA)

If an employee participates in North Risk Partners' benefit plan and then loses coverage due to a reduction in hours, disability, termination, divorce, children losing dependent status, death, or Medicare entitlement, he or she may continue his or her medical insurance for up to 18, 29, 36 months, or indefinitely, depending on the qualifying event and in accordance with applicable state laws. The employee must elect continuation within 60 days of the qualifying event. It is the employee's responsibility to advise the Employee Relations Department if dependent coverage is being lost due to any of the above reasons.

STANDARD OF CONDUCT

ACCEPTABLE USE POLICY

The purpose of the North Risk Partners Acceptable Use Policy is to establish acceptable practices regarding the use of North Risk Partners Information Resources in order to protect the confidentiality, integrity and availability of information created, collected, and maintained.

[North Risk's Acceptable Use Policy »](#)

SOCIAL MEDIA POLICY

At North Risk Partners we understand social media can be a fun and rewarding way to share your life and opinions with family, friends and co-workers around the world. However, use of social media also presents certain risks and carries with it certain responsibilities. To assist you in making responsible decisions about your use of social media, we have established these guidelines for appropriate use of social media.

This policy applies to all employees who work for North Risk Partners.

Guidelines of the social media policy:

In the rapidly expanding world of electronic communication, social media can mean many things. Social media includes all means of communicating or posting information or content of any sort on the internet, including your own or someone else's web log or blog, journal or diary, personal website, social networking or affinity website, web bulletin board or a chat room, whether or not associated or affiliated with North Risk Partners, as well as any other form of electronic communication.

The same principles and guidelines found in North Risk Partners policies apply to your activities online. Ultimately, you are solely responsible for what you post online. Before creating online content, consider some of the risks and rewards that are involved. Keep in mind that any of your conduct that adversely affects your job performance, the performance of fellow employees or otherwise adversely affects customers, suppliers, people who work on behalf of North Risk Partners or North Risk Partners' legitimate business interests may result in disciplinary action up to and including termination.

Know and follow the rules.

Carefully read these guidelines, the North Risk Partners Code of Business Conduct Policy, the North Risk Partners Electronic Mail and Online Services Policy and the Workplace Harassment Policy, and ensure your postings are consistent with these policies. Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence or similar

inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including termination.

Be respectful.

Always be fair and courteous to fellow employees, clients, suppliers or people who work on behalf of North Risk Partners. Also, keep in mind that you are more likely to resolve work-related complaints by speaking directly with your co-workers or by utilizing our Open-Door Policy than by posting complaints to a social media outlet. Nevertheless, if you decide to post complaints or criticism, avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating, that disparage clients, employees or suppliers, or that might constitute harassment or bullying. Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion or any other status protected by law or company policy.

Be honest and accurate.

Make sure you are always honest and accurate when posting information or news, and if you make a mistake, correct it quickly. Be open about any previous posts you have altered. Remember that the internet archives almost everything; therefore, even deleted postings can be searched. Never post any information or rumors that you know to be false about North Risk Partners, fellow employees, clients, suppliers, and people working on behalf of North Risk Partners or competitors.

Post only appropriate and respectful content.

- Maintain the confidentiality of North Risk Partners trade secrets and private or confidential information. Trade secrets may include information regarding the development of systems, processes, products, know-how and technology. Do not post internal reports, policies, procedures or other internal business-related confidential communications.
- Respect financial disclosure laws. It is illegal to communicate or give a "tip" on inside information to others so that they may buy or sell stocks or securities. Such online conduct may also violate the Insider Trading Policy.
- Do not create a link from your blog, website or other social networking site to a North Risk Partners website without identifying yourself as a North Risk Partners employee.
- Express only your personal opinions. Never represent yourself as a spokesperson for North Risk Partners. If North Risk Partners is a subject of the content you are creating, be clear and open about the fact that you are an employee and make it clear that your views do not represent those of North Risk Partners, fellow employees, clients, suppliers or people working on behalf of North Risk Partners. If you do publish a blog or post online related to the work you do or subjects associated with North Risk Partners, make it clear that you are not speaking on behalf of North Risk Partners. It is best to include a

disclaimer such as “The postings on this site are my own and do not necessarily reflect the views of North Risk Partners.”

Using social media at work:

Refrain from using social media while on work time or on equipment the company provides, unless it is work-related as authorized by your manager or consistent with the Electronic Mail and Online Services Policy. Do not use North Risk Partners email addresses to register on social networks, blogs or other online tools utilized for personal use.

Retaliation is prohibited.

North Risk Partners prohibits taking negative action against any employee for reporting a possible deviation from this policy or for cooperating in an investigation. Any employee who retaliates against another employee for reporting a possible deviation from this policy or for cooperating in an investigation will be subject to disciplinary action, up to and including termination.

Media contacts

Employees should not speak to the media on North Risk Partners’ behalf without first contacting a member of its executive leadership. All media inquiries should be directed to executive leadership or the company’s Communications team for response.

PHONE AND VOICEMAIL PHILOSOPHY

North Risk Partners is a customer service business, so phone mail should be used efficiently as a business tool to provide excellent service to our customers, and it should never be used in any manner that results in inferior service to our customers.

Remember:

- Most people want to talk to a “live” person when they have a question or problem. Consequently, there must always be an option to allow the caller to speak with a “real, live person” should he or she choose to do so.
- Work groups must be structured in such a way that a person is always available to take calls. If that is not the case in your area, please let your manager/supervisor know so that this can be remedied.
- Clients also have a timeliness expectation which must be satisfied. They should be able to speak with the person when they make the call or as soon as possible afterward.

To improve your service to our clients, be sure to:

- Change your message frequently
- State if you are in or out of the office and the length of time you will be unavailable

- Check your messages frequently, and return all calls promptly

A good rule of thumb is to provide the same information in a phone mail greeting that would be provided in a traditional person-to-person telephone conversation.

USE OF CELL PHONES OR SIMILAR DEVICES FOR PERSONAL USE

While at work, employees are expected to exercise the same discretion in using personal cell phones as they use with company phones. Excessive personal calls during the workday, regardless of the phone used, can interfere with employee productivity and be distracting to others. Employees should restrict personal calls during work time and should use personal cell phones for calling and/or texting only during scheduled breaks or lunch periods in non-working areas. Other personal calls or texts should be made during non-work time whenever possible, and employees should ensure that their friends and family members are instructed of this policy. North Risk Partners is not liable for the loss of personal cell phones brought into the workplace.

To ensure the effectiveness of meetings, employees are asked not to bring their cell phones. On the unusual occasion of an emergency or anticipated emergency that may require immediate attention, the cell phone may be carried to the meeting but must be on vibrate mode. Given that personal use of a cell phone or similar device during working hours is restricted, we ask that the support staff not have their cell phones on their desk during working hours.

SOLICITATION, CANVASSING AND DISTRIBUTION

Solicitation, distribution of literature or other material, or selling of merchandise to employees on North Risk Partners property or on property leased by the company is not permitted at any time by anyone who is not employed by North Risk Partners.

ANTI-CORRUPTION COMPLIANCE POLICY

The company will not tolerate bribery, kickbacks, or corruption of any kind, directly or through third parties, whether or not explicitly prohibited by this policy or by law. Company personnel are not permitted to give or offer anything of value (including gifts, hospitality, or entertainment) to anyone for the purpose of bribing, or improperly obtaining or retaining a business advantage. Similarly, company personnel may not solicit or accept such improper payments.

Company employees who violate this policy may be subject to disciplinary action, up to and including termination. Company personnel must conduct their activities in full compliance with this policy, the laws of the U.S. and all applicable anti-corruption laws, including without limitation any state or local anti-corruption laws, the UK Bribery Act and the United States

Foreign Corrupt Practices Act (“FCPA”). Company personnel are not permitted to give or offer anything of value, directly or indirectly, to any Government Official¹ for the purpose of improperly obtaining or retaining a business advantage. “Anything of value” should be broadly interpreted to include cash, gifts to family members, forgiveness of a debt, loans, personal favors, entertainment, meals and travel, political and charitable contributions, business opportunities and medical care, among other items. **Simply put, bribes, kickbacks or similar payments for improper purposes are never permitted, whether made to a Government Official or other private parties. Similarly, company personnel may not solicit or accept such improper payments.**

Meals, entertainment, travel and lodging should only be offered if it is appropriate, reasonable for promotional purposes, offered or accepted in the normal course of an existing business relationship, and if the primary subject of discussion or purpose is business. The appropriateness of a particular type of entertainment, travel and lodging of course depends upon both the reasonableness of the expense and on the type of activity involved. This is determined based on whether or not the expenditure is sensible and proportionate to the nature of the individual involved. Adult entertainment is strictly prohibited. Any meal, entertainment, travel or lodging expense incurred on behalf of a Government Official, and any expense at all that is incurred for meals, entertainment, travel or lodging unrelated to a legitimate business purpose or promotional purposes, must be pre-approved by the Chief Financial Officer (CFO). When in doubt whether something is appropriate, ask the CFO.

On occasion, Government Officials may request that the company provide internships or employment to certain individuals. Offering internships or employment to Government Officials may be viewed as providing an item of value. If the company is planning to offer an internship to or on behalf of a Government Official, or at the request of a Government Official, such offer must be pre-approved by the company’s CFO. Additionally, anti-corruption laws prohibit indirect payments made through a third party, including giving anything of value to a third party while knowing that value will be given to a Government Official for an improper purpose. Therefore, company personnel should avoid situations involving third parties that might lead to a violation of this policy.

The company takes its commitment to anti-corruption compliance very seriously and expects all company personnel to share that commitment. The company therefore expects and requires

¹ The term “Government Official” includes all officers or employees of a government department, agency or instrumentality; permitting agencies; customs officials; candidates for political office; and officials of public international organizations (e.g., the Red Cross). This term also includes officers or employees of government-owned or controlled commercial enterprises such as state-owned or controlled universities, airlines, oil companies, health care facilities or other vendors. The term also includes family members and close associates of such individuals (e.g., it is not permissible to give a lavish gift to the sibling, spouse or child of a government employee if a gift to the individual would be prohibited under this policy).

any company personnel who have knowledge of, or reason to suspect, any violation of this policy to contact the CFO immediately. Reports may be made anonymously. If any company personnel fail to report known or suspected violations, then the relevant company personnel may be subject to disciplinary action, up to and including termination.

If an employee wishes to report an incident anonymously, they may do so by using this reporting form: <https://www.lighthouse-services.com/reportingline>

It is the company's policy that, if the report of known or suspected violations is made honestly and in good faith, no adverse employment-related action will be taken against any company personnel in retaliation for reporting a violation or suspected violation of anti-corruption laws or this policy. All questions regarding this policy should be directed to the CFO.

SMOKE-FREE ENVIRONMENT

In response to evidence that passive smoke is harmful to smokers and non-smokers alike, North Risk Partners provides a tobacco-free work environment to employees and prohibits the smoking of any tobacco product or e-cigarette and the use of smokeless or chewing tobacco on company owned and leased property, including vehicles. This prohibition applies to visitors as well as all employees.

DRESS CODE

How North Risk Partners' team presents itself matters. We respect individual preference and choice in dress and appearance. We trust employees will use their best judgment in following the company's dress and attire guidelines. At all times employees should make certain their appearance is well-groomed and clean, and that clothing is appropriate, neat, clean and well-fitting.

As a general rule, North Risk Partners employees are expected to dress in traditional business attire when formally meeting with clients, prospects, and vendors. An exception to this rule may be made only when it makes good business sense. On days when an employee knows he or she is not meeting with someone from one of the three previously mentioned groups, he or she is free to dress casually.

On occasion, there may be a specific business reason to require all employees dress in traditional business attire. In such an instance, this requirement will be communicated to employees in advance.

The following are some modes of dress that are unacceptable at all times.

- Flip flops, snow boots, industrial work boots
- Leggings or extremely short dresses, skirts or shorts
- Sweatshirts, t-shirts, oversized shirts, tank tops, halter tops or crop tops

- Dirty, ragged, ungroomed, sexually provocative, revealing or see-through clothing
- Any clothing displaying an offensive comment or graphic illustration
- Clothing with graphics such as sport team logos, cartoon characters, and more unless otherwise specified

GENERAL INFORMATION

Office Equipment

Certain equipment is assigned to staff depending on the needs of the job. That equipment can include items such as a personal computer, printer, calculator, and access to our central computers and servers. This equipment is the property of North Risk Partners and cannot be removed from the office without prior approval from management. It is expected that you will treat this equipment with care and report any malfunctions immediately to staff members equipped to diagnose the problem and take corrective action.

Workplace Privacy and Company Property

Employees do not have a right to privacy in their workspaces or in any other property belonging to North Risk Partners. North Risk Partners reserves the right to search North Risk Partners property at any time without warning to ensure compliance with our policies, including those that cover employee safety, workplace violence, harassment, theft, drug and alcohol use, and possession of prohibited items. North Risk Partners property includes but is not limited to lockers, desks, file cabinets, storage areas and workspaces.

Work Product Ownership

All North Risk Partners employees must be aware the company retains legal ownership of the product of their work. No work product created while employed by North Risk Partners can be claimed, construed, or presented as property of the individual, even after employment with North Risk Partners has been terminated or the relevant project completed. This includes written and electronic documents, audio and video recordings, system code, and also any concepts, ideas, or other intellectual property developed for North Risk Partners, regardless of whether the intellectual property is actually used by the company.

Although it is acceptable for an employee to display and/or discuss a portion or the whole of certain work product as an example in certain situations (e.g., on a resume, in a freelancer's meeting with a prospective client), one must bear in mind that information classified as confidential must remain so even after the end of employment, and that supplying certain other entities with certain types of information may constitute a conflict of interest. In any event, it must always be made clear that work product is the sole and exclusive property of North Risk Partners. Freelancers and temporary employees must be particularly careful in the course of any work they discuss doing, or actually do, for a competitor of North Risk Partners.

Wage Disclosure Protections

North Risk Partners will not prohibit employees from discussing his or her wages as a condition of employment. Further North Risk Partners will not require an employee to sign a waiver or other document that takes away their right to disclose their wages.

North Risk Partners will not take any adverse employment action against an employee for disclosing the employee's own wages or discussing another employee's wages which have been disclosed voluntarily.

However, nothing in this section shall be construed to:

- create an obligation for the employer or employee to disclose wages
- permit an employee, without the written consent of the employer, to disclose proprietary information, trade secret information, or information that is otherwise subject to a legal privilege or protected by law
- diminish any existing rights under the National Labor Relations Act under United States Code, title 29
- permit the employee to disclose wage information of other employees to a competitor of their employer

We will not retaliate against an employee for asserting their rights or remedies under these Statutes.

Personnel File

North Risk Partners maintains a personnel file on each employee. The purpose of this file is to allow us to make decisions and take actions that are personally important to an employee, including notifying your family in case of emergency, calculating income tax deductions and withholding, and paying for appropriate insurance coverage. It is impossible to list the all types of documentation we keep in an employee's personnel file. We do not keep medical records or work eligibility forms in personnel files. Those are kept separately.

Personnel files are the property of North Risk Partners. Generally, only the Employee Relations Department, supervisors and management personnel of North Risk Partners who have a legitimate reason to review information in a file are allowed to do so in accordance with state law. At the company's discretion, parts of an employee's file may be made available to view by the employee on an ongoing basis through the company's online payroll system (Paylocity).

Employees may review their personal file in Paylocity at anytime during the duration of employment. Employees who wish to request a hard copy of their file should notify the Employee Relations Department in writing.

Within seven working days of receiving your request (or within 14 working days if your personnel records are stored out of state), North Risk Partners will make available for your

review either your original file or an accurate copy of your file. You will have access to your file during normal operating hours either at your job site or at a nearby location. We may require that this review take place in the presence of a company representative. After you have had an opportunity to review your file, you may make a written request for a copy of the record. If you make such a request, we will provide you with a copy of your file at no charge to you.

After your separation from employment (for whatever reason), you may review your file once annually for as long as we maintain the record. If you make a good faith, written request to review your file after your employment with us has ended, we will provide a copy of your file at no cost to you.

If, after reviewing your file, you dispute specific information contained in the record, we may agree to remove or revise the disputed information. If no such agreement is reached, you are entitled to submit a written statement of no more than five pages explaining your position. This position statement will be included in your file, along with the disputed information, for as long as we maintain the record.

We will not retaliate against you for asserting your rights under this regulation.

Motor Vehicle Operation

North Risk Partners may periodically review driving records and require state-mandated liability insurance verification to assure that the company and those who operate company or personal vehicles on company business are properly protected. Mileage costs we pay are meant to partially offset your gas, insurance, maintenance expenses, etc.

Certain positions here require the operation of a motor vehicle on company time and/or for company business. Operation of a motor vehicle without a valid operator's license is against the law. If you hold such a position, you must have a valid driver's license. Those who drive personal cars on company business must also carry at least \$300,000 CSL or \$100,000/\$300,000 split limit liability insurance. Driving with a suspended or revoked license or, if driving your own car, without required insurance, is breaking the law and putting the company in a position of great risk and potential liability.

If you need a driver's license to do your job, and your license is suspended or revoked, you must immediately inform management and cease to operate any motor vehicle on company time or for company business. Depending upon business needs and your employment history, we may attempt to find an alternative temporary position for you until your license can be reinstated. For positions where independent travel by motor vehicle is critical to job performance, your employment may be immediately suspended or terminated.

Failure to notify management of suspension or revocation of your driver's license, or operating a motor vehicle during work hours or on company business without a valid operator's license or

for personal cars the required insurance coverage, will result in disciplinary action, up to and including termination.

Travel Reimbursement

North Risk Partners will reimburse certain travel expenses when they are incurred for business-related purposes. For team members that have an Addendum A, travel reimbursement will be highlighted on the Addendum A. For other team members who do not have an Addendum A, certain travel expenses will be reimbursed. Below are guidelines that apply to all team members.

- For those traveling by car for business purposes, we will reimburse the standard IRS mileage rate.
 - If you are traveling by airplane or other method of transportation, you should consult with your supervisor to determine what will be reimbursed.
- When travel is required, and meals are not provided during travel (e.g., at hotel or at the meeting/conference), employees may submit reimbursement for meal expenses.
 - The per diem method is:
 - \$10 for breakfast and lunch
 - \$20 for dinner

As a general rule, limitations on travel related reimbursement are detailed on the Addendum A (if applicable); or as approved by your manager. Employees are encouraged to check with their manager before incurring business related travel expenses to gain prior approval and avoid confusion.

Reimbursements are submitted through an online expense tracking platform. Please refer to the company intranet site for specific due dates. Reimbursement dates are aligned with the semi-monthly payroll. Reimbursements are included with payroll as a separate non-taxable line item on your payroll check stub. You will see it listed as "Exp. Reimbursement".

EMERGENCY PROCEDURES AND WORKERS' COMPENSATION

We all have a responsibility to each other to provide a safe, comfortable working environment. Colleagues should report any unsafe conditions to their supervisor and the Employee Relations Department. North Risk Partners believes in providing a safe environment in which to work. If you, a co-worker or an external visitor is injured, you must report the incident to department supervisor and the Employee Relations Department immediately. Prompt reporting of injuries will help the company address any safety issues and is necessary for insurance procedures. All employees must abide by all safety rules and regulations.

All offices should have in place specific and up-to-date procedures for reacting to both emergency and nonemergency injuries and illnesses.

Emergency Procedures

It is our commitment that all employees receive speedy and appropriate treatment for work-related accidental injuries or illnesses. North Risk Partners is also dedicated to providing a workplace that is safe from hazards and where constant and proactive assessment is utilized as a tool to prevent injuries. The expectation is that every employee will be vigilant in identifying and eliminating any situation or activity that could potentially cause injury to any employee. Upon detecting a medical emergency, the affected employee must receive immediate medical attention and employees who are aware of the situation are to assist in obtaining such medical attention.

Non-emergency Procedures

The affected employee's manager or supervisor should contact the Employee Relations Department or a member of senior management to arrange for nonemergency medical evaluation and treatment and provide all information available regarding the event which caused the injury or the illness, including names of witnesses. If the employee is not capable of safely operating a motor vehicle, the manager or supervisor should arrange appropriate transportation.

Reporting

Management is responsible for submitting a first report of injury to the Employee Relations Department within 12 hours of an incident occurring. Every attempt will be made to provide appropriate work for an employee placed on restricted or light duty after medical evaluation and treatment. If it is not possible to provide light duty in accordance with the restrictions assigned, the employee will be placed on Family and Medical Leave (FMLA) pending release of the work restriction by the attending physician.

Per federal statute, the employee's medical absence due to Workers' Compensation injuries is charged to the employee's annual allocation of Family and Medical Leave Act (FMLA) leave time.

Employee Responsibilities

An employee who is injured or becomes ill should notify their immediate supervisor and the Employee Relations Department as soon as possible. The employee should provide details how the injury happened and names of witnesses if possible.

Employees are expected to cooperate with any designated health care provider in receiving treatment or undergoing therapy to speedily resolve the injury or illness. This would include taking any medications, participating in therapy, and wearing or otherwise using any devices prescribed by the health care provider.

Employees who are unable to return to work are expected to maintain open communication with the Employee Relations Department and their supervisor during the duration of leave. This contact is necessary in order to preserve the benefits of both Workers' Compensation and FMLA.

Employees who are working and are injured or become ill outside of normal business hours and not on company property should seek immediate medical attention. They should report the event on the next business day to their manager or supervisor. In case the employee is in some way incapacitated and unable to make a report, the employee should ask someone else to report to the company on their behalf.

Medical benefits are provided to employees who sustain occupational injury/illness covered by the applicable Workers' Compensation statute. Wage loss for temporary disabilities may not be payable until after any applicable waiting period.

It is the employee's personal responsibility to cooperate diligently in receiving medical care to alleviate disability and to promote return to work as soon as possible.

Workers compensation is intended to cover only work-related injuries and illnesses. Because of this, neither North Risk Partners nor our insurance carrier will be liable for the payment of Workers' Compensation benefits for injuries that might occur during employee's voluntary participation in off-duty recreational, social or athletic activities that we may sponsor. If any North Risk Partners employee is injured on the job a mandatory drug and/or alcohol test may be required.

TERMINATION OF EMPLOYMENT

Termination of employment is an inevitable part of personnel activity within any organization and many of the reasons for termination fall into one of the below categories. The following are some of the most common circumstances for employment terminations.

- Resignation: voluntary employment termination initiated by an employee
- Discharge: involuntary employment termination initiated by North Risk Partners
- Separation: involuntary employment termination initiated by the organization for non-corrective action reasons
 - Separation includes layoff, displacement, or work force reductions
- Furlough: involuntary temporary leave initiated by the organization for non-corrective action reasons
- Retirement: voluntary employment termination initiated by the employee meeting age, length of service and any other criteria for retirement from the organization

North Risk Partners and its employees share a working relationship defined, as employment-at-will. Simply stated, employment-at-will means that in the absence of a specific written agreement, you are free to resign at any time, and North Risk Partners reserves the right to

terminate your employment for any reason (which does not violate any applicable law) with or without prior notice.

If you wish to resign, you are requested to notify your manager of your anticipated departure date at least two weeks in advance. This notice should be in the form of a written statement. Failure to provide this written statement may result in the employee losing all accrued by unused PTO.

In the case of involuntary terminations, unused PTO will not be paid out in compliance with applicable state laws. A health insurance extension of benefits under the COBRA regulations is available and is offered via mail to eligible employees. Credit cards, office keys, company equipment, and vehicle keys (if applicable) must be returned at this time.

If you leave North Risk Partners in good standing, you may be considered for re-employment. In the case that you are rehired, you will be considered a new employee with respect to PTO, benefits, and years of service, and may include a new rate of pay.

APPENDIX: APPLICABLE STATE SPECIFIC REGULATIONS

IOWA

Iowa Pregnancy and Disability Leave

When alternative federal and state leaves are not available or sufficient leave is not available, North Risk Partners will grant an employee disabled by pregnancy a leave of absence for the length of time that is the lesser of:

- The period that the employee is disabled because of pregnancy, childbirth, or related medical conditions; or
- 8 weeks.

North Risk may require that the employee's disability resulting from pregnancy be verified by medical certification stating that the employee is not able to reasonably perform the duties of employment.

MINNESOTA

Minnesota Pregnancy and Parental Leave Law

North Risk Partners complies with the Minnesota Pregnancy and Parental Leave Law governing parental leave rights. The law provides eligible employees with up to 12 workweeks of unpaid leave for the birth or adoption of a child. This leave can also be used to cover prenatal care, incapacity due to pregnancy, childbirth, or related conditions for female employees.

The employee must have worked for North Risk Partners for at least 12 months preceding the request; and for an average number of hours per week equal to one-half the full-time equivalent position in the employee's job classification during the 12-month period immediately preceding the leave.

An employee should request a leave in writing and submit it to their supervisor at least 30 days prior to the leave. The leave may begin anytime within 12 months after the birth or adoption of a child, or within 12 months after the child leaves the hospital, if the child remains in the hospital longer than the mother.

Leave is unpaid unless the employee uses available paid time off with the terms applicable to that benefit. An employee who receives group insurance coverage may retain the same insurance that applied before the leave commenced. To continue coverage employees must continue to pay all employee contributions throughout the leave. Employees who are not receiving paychecks from which deductions may be made must send their portion of the premium to North Risk Partners either in full, in advance, or in installments by each payday for

which an associate contribution to the premium is due. Failure to pay the associate contribution may result in cancellation of coverage.

An employee eligible for leave will be restored to his or her prior position or to a position with equivalent pay, benefits and other terms and conditions of employment. In the event that the prior position is no longer available, North Risk Partners will determine an equivalent position.

Failure to return to work within three days at the conclusion of the leave may result in termination of employment as of the last date worked prior to the leave and may necessitate repayment of any insurance premiums, if applicable, paid for by North Risk Partners.

NEBRASKA

PAID TIME OFF (PTO)

In accordance with the state of Nebraska, North Risk Partners will abide by Nebraska's PTO regulations for employees within this state. Employees in Nebraska will accrue PTO each pay period based on the PTO schedule listed in this handbook; however, employees in Nebraska will cap out at a maximum of 100 PTO hours. Employees must use PTO prior to accruing any additional PTO once 100 hours has been accrued.

PTO will carryover from year to year not to exceed the 100-hour maximum cap. All PTO will be paid out upon termination in compliance with state regulations.

NORTH DAKOTA

PAID TIME OFF (PTO)

If an employee separates from employment, North Risk Partners will comply with applicable state laws regarding the payment of PTO at the time of resignation. *PTO*

NEW YORK

Paid Family Leave

Employees in the state of New York are eligible for job-protected paid family leave. North Risk Partners complies with the state requirements for paid family leave.