

The FootBridge Companies

**PERSONNEL POLICIES
AND
GUIDELINES**



POLICIES AND PROCEDURES CHECKLIST

1. I understand The FootBridge Companies takes their responsibility as my employer very seriously, and that they have gone to great length to provide a safe work environment. If I am injured on the job, The FootBridge Companies will deal promptly with legitimate claims and has workers compensation insurance that will pay medical expenses and wages. I also understand that The FootBridge Companies has extensive experience investigating claims and will fight fraudulent claims with all available resources.
2. If I sustain an injury on the job, I will inform the client and The FootBridge Companies immediately, who will coordinate with the client and myself the proper procedures for treatment and reporting of the accident.
3. The FootBridge Companies has a Comprehensive "Substance Abuse Policy", and I have signed a consent form to submit to drug testing. I understand that my failure to comply with this agreement will be grounds for my immediate termination.
4. I understand and will comply with The FootBridge Companies safety rules and regulations and hazardous communication program explained to me in The FootBridge Companies orientation.
5. I am telephone accessible and I have reliable transportation.
6. I have read and understand The FootBridge Companies Personnel Policies and Guidelines, and the General Safety Rules including: Equal Employment Opportunity, Disability Accommodation, Immigration Law Compliance, Sexual Harassment Policy, Safety, Drug and Alcohol Use, Workplace Violence Prevention, Employee Conduct and Work Rules, Progressive Discipline, Problem Resolution Procedure, and Personal Information Security Compliance. I understand that the failure to comply with these Policies and Procedures could lead to my termination and may jeopardize employment.
7. I understand that I am expected to complete any job assignment I accept. I understand that if I do not complete or promptly notify of my inability to complete the assignment, or if I do not report for my assignment then The FootBridge Companies may assume I have voluntarily quit, and I will not be eligible for unemployment benefits.
8. If for some unexpected reason, such as an emergency or illness, I cannot make it to work or will be late, I will contact The FootBridge Companies AND my direct Supervisor at the Client Company as soon as possible.
9. I understand The FootBridge Companies requirements for receiving information documenting hours worked, the method of providing this information, and the time frame for me to provide this information. I understand The FootBridge Companies will not recognize or pay for any hours worked by an employee without proper documentation verifying hours worked.
10. I have read and fully understand the above statements regarding The FootBridge Companies policies and procedures and agree to the same. I understand that failure to comply with these policies and procedures could lead to my termination and may jeopardize employment.

Applicant Signature

Print Name

Date

FootBridge Safety Philosophy

Our employees are valuable resources to both FootBridge and our clients. No phase of business is of greater importance than their personal safety. FootBridge believes that all accidents can be prevented and that safety is an integral part of everyone's job. FootBridge management and our clients are responsible for demonstrating safety leadership, providing a safe work environment and promoting safety as a value.

FootBridge Substance Abuse Philosophy

FootBridge is committed to providing a **drug-free, healthful and safe workplace**. To promote this goal, employees are required to report to work in appropriate mental and physical condition to perform their jobs in a satisfactory manner. Individuals under the influence of drugs or alcohol in the workplace pose serious safety and health risks, not only to themselves, but also to all those who surround or come into contact with them. To help maintain this, FootBridge utilizes a **Comprehensive Substance Abuse Policy**.

FootBridge Workers Compensation Philosophy

FootBridge takes our responsibility as an employer very seriously. We go to great lengths to provide a safe working environment and workers compensation insurance for our employees. We expect that **all injuries and claims are reported** and we commit to dealing with all claims promptly. FootBridge works with our employees to help ensure their concerns and issues are addressed and that claims are expediently dispositioned. We support a modified work duty program to assist our employee's return to work. On the other hand, we have **extensive experience investigating fraudulent or malingering claims**, and we will fight these types of claims with all available resources.

Pre-Employment Background Screening Policy

FootBridge seeks to provide a safe and secure environment for employees, and protection for the financial and material assets of FootBridge and our Clients. To accomplish this goal, FootBridge reserves the right to perform background checks on new employees to identify individuals whose presence in the workplace would create an unacceptable risk to our campus community.

Falsification of application materials, including failure to disclose misdemeanor or felony convictions, is grounds for refusal or termination of employment.

Our Policy details but is not limited to the following types of verifications:

- **Criminal Record Check**
- **Credit Check**
- **Motor Vehicle Check**
- **Degree Verification**
- **Employment Verification**

Equal Employment Opportunity

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at FootBridge are based on qualifications and abilities. FootBridge does not discriminate in employment opportunities or practices on the basis of race, color, religion, sex, sexual orientation, marital status, national origin, citizenship, pregnancy, veteran's status, age, mental or physical disability, or any other personal characteristic protected by law.

FootBridge will make reasonable accommodations for qualified individuals with known mental or physical disabilities unless doing so would result in an undue hardship on the company. This policy governs all aspects of employment with The FootBridge Companies.

Any employees with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their manager. Employees can raise concerns and make reports without fear of reprisal.

Disability Accommodation

FootBridge is committed to complying fully with the Americans with Disabilities Act ("ADA") and ensuring equal opportunity in employment for qualified persons with disabilities. All employment practices and activities are conducted on a non-discriminatory basis. Hiring procedures have been reviewed and provide persons with disabilities meaningful employment opportunities. Pre-employment inquiries are made only regarding an applicant's ability to perform the duties of the position. Qualified individuals with disabilities are entitled to equal pay and other forms of compensation as well as equal treatment in job assignments, classifications, organizational structures and position descriptions.

Immigration Law Compliance

FootBridge is committed to employing only United States citizens and aliens who are authorized to work in the United States and does not unlawfully discriminate on the basis of citizenship or national origin.

In compliance with the Immigration Reform and Control Act of 1986, each new employee, as a condition of employment, must complete the Employment Eligibility Verification Form I-9 and present documentation establishing identity and employment eligibility. Former employees who are rehired must also complete the form if they have not completed an I-9 with FootBridge within the past three years, or if their previous I-9 is no longer retained or valid.

Sexual Harassment Policy

FootBridge strongly believes that every employee is entitled to a work environment free from sexual harassment. Sexual harassment is a form of employee misconduct that interferes with work productivity and wrongly deprives employees of a work environment in which employees are treated with dignity and respect. Sexual harassment is a form of sexual discrimination that is prohibited by state and federal law.

Sexual harassment is defined as unwelcome sexual or gender-based conduct that creates a hostile, intimidating or offensive work environment. It also exists when an employee exercises or threatens the authority of his or her position to control, influence, direct, or affect the job, duties, earnings, or career of another employee in order to obtain a sexual favor. In other words, it includes unwelcome sexual advances, requests for sexual favors, and other verbal, physical or visual conduct of a sexual nature, particularly where:

- a) Submission to such conduct is made a condition of employment;
- b) Submission or rejection of such conduct is used as a basis for employment decisions affecting the individual; or
- c) The conduct has the purpose or effect of substantially interfering with work performance.

All decisions regarding employment benefits, opportunities, and performance are made on the basis of merit and without discrimination or condition upon submission to any sexual or amorous conduct.

Sexual harassment may take on many forms. Examples of sexual harassment may include, *but are not limited to*, repeated offensive or unwelcome comments, unnecessary physical contact or touching, lewd or off-color humor, sexual innuendo, unwanted propositions, obscene gestures, excessive flirtation, or the display of sexually suggestive pictures or cartoons.

FootBridge expressly prohibits and will not tolerate sexual harassment in any form by or against any employee of FootBridge or management or other third party individuals who have a relationship with FootBridge which enables FootBridge to exercise some control over the individual's conduct in places and activities that relate to Footbridge (e.g., customers, vendors, visitors, etc.) If an employee believes he/she has experienced sexual harassment, then he/she is encouraged to directly inform the offending person(s) that such conduct is offensive and must stop.

Sexual Harassment Policy (cont'd)

If you do not wish to communicate directly with the alleged harasser(s), or if direct communication has been ineffective, then the person with the complaint is encouraged to immediately notify any manager of FootBridge.

FootBridge will promptly conduct an investigation into all good-faith complaints and take appropriate corrective action that may include discipline, up to and including termination of the offending party. In the course of handling complaints, FootBridge will strive to maintain confidentiality to the extent possible under the circumstances.

All employees should note that retaliation against an employee who has complained of sexual harassment or against individuals cooperating with the investigation of a sexual harassment complaint is unlawful and will not be tolerated. FootBridge guarantees that no employee will be subject to any form of retaliation or discipline for lodging any good-faith complaints of sexual harassment. Retaliation is a form of illegal sexual harassment that is against this policy and will be treated in the same manner as other forms of sexual harassment.

Anti-Harassment Policy

FootBridge is committed to providing a work environment that is free of unlawful harassment. Engaging in actions, writings, or comments based on an individual's race, color, religion, sex, sexual orientation, marital status, national origin, pregnancy, veteran's status, age, mental or physical disability, or any other legally protected personal characteristic is a violation of this policy. Unlawful harassment (both overt and subtle) is a form of employee misconduct that is demeaning to another person, undermines the integrity of the employment relationship, and is strictly prohibited. While it is not always easy to identify precisely what conduct constitutes harassment, prohibited conduct certainly includes but is not limited to slurs, epithets, derogatory comments, unwelcome jokes, teasing, or other similar verbal or physical conduct. At FootBridge freedom from unlawful harassment is not only a legal commitment it is a moral commitment as well.

FootBridge will not tolerate unlawful harassment in any form by or against any employee of FootBridge. This policy against harassment also covers other third party individuals who have a relationship with FootBridge, which enables FootBridge to exercise some control over the individual's, conduct in places and activities that relate to FootBridge (e.g. customers, vendors, etc.).

If an employee believes he or she has experienced unlawful harassment, then he or she is encouraged to directly inform the offending person(s) that such conduct is offensive

Anti-Harassment Policy (cont'd)

and must stop. If the employee does not wish to communicate directly with the alleged harasser(s), or if direct communication has been ineffective, then that employee is encouraged to immediately notify any manager of FootBridge.

FootBridge will promptly conduct an investigation into all good-faith complaints and take appropriate corrective action, which may include discipline up to and including termination of the offending party. In the course of handling complaints, FootBridge will strive to maintain confidentiality to the extent possible under the circumstances.

All employees should note that retaliation against an employee who has complained of unlawful harassment or against individuals cooperating with the investigation of an unlawful harassment complaint is unlawful and will not be tolerated. FootBridge guarantees that no employee will be subject to any form of retaliation or discipline for lodging any good-faith complaints of unlawful harassment. Retaliation is a form of illegal harassment that is against this policy and will be treated in the same manner as other forms of unlawful harassment.

Safety

To assist in providing a safe and healthful work environment for all employees, FootBridge encourages open communication relating to health and safety issues.

Some of the best safety improvement ideas come from employees. Those with ideas, concerns, or suggestions for improved safety in the workplace are encouraged to raise them with their manager, or bring them to the attention of any FootBridge manager. Reports and concerns about workplace safety issues may be made anonymously if the employee wishes. All reports can be made without fear of reprisal.

Each employee is expected to obey safety rules of the client company and to exercise caution in all work activities. Employees must immediately report any unsafe condition to the appropriate manager. Employees who violate safety standards, who cause hazardous or dangerous situations, or who fail to report or, where appropriate, remedy such situations, may be subject to disciplinary action, up to and including termination of employment.

In the case of accidents that result in injury, regardless of how insignificant the injury may appear, employees should immediately notify their FootBridge manager. Such reports are necessary to comply with laws and initiate insurance and workers' compensation benefits procedures.

Drug and Alcohol Use

It is The FootBridge Companies' desire to provide a drug-free, healthful and safe workplace. To promote this goal, employees are required to report to work in appropriate mental and physical condition to perform their jobs in a satisfactory manner. Individuals under the influence of drugs or alcohol in the workplace pose serious safety and health risks, not only to themselves, but also to all those who surround or come into contact with them.

While on FootBridge premises, or on the premises of a FootBridge client, or while conducting any business-related activities, no employee may use, possess, manufacture, distribute, dispense, sell, or be under the influence of alcohol, illegal drugs, or controlled substances. The legal use of prescribed drugs is permitted on the job only if it is pursuant to the instructions of a licensed medical practitioner, it does not impair an employee's ability to perform the essential functions of the job safely and effectively, and it does not endanger other individuals in the workplace. This extends to instances and places where you are in a position to be regarded or identified as representing The FootBridge Companies; such as traveling.

Your continued employment with FootBridge is conditioned upon your full compliance with this policy. Any violations of this policy may result in disciplinary action, up to and including immediate termination of employment. Such violations may also result in civil or criminal liability.

Workplace Violence Prevention

FootBridge is committed to preventing workplace violence and to maintaining a safe work environment. Given the increasing violence in society in general, FootBridge has adopted the following guidelines to deal with intimidation, harassment, or other threats of (or actual) violence that may occur during business hours or on its premises.

All employees, including managers and temporary employees, must 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. Firearms, weapons and other dangerous or hazardous devices or substances are prohibited from the premises of FootBridge or a client of FootBridge without proper authorization.

Conduct that threatens, intimidates, or coerces another employee, a client, or a member of the public at any time, including off-duty periods, will not be tolerated. This prohibition includes all acts of harassment, including harassment that is based on an individual's sex, race, color, religion, sex, sexual orientation, citizenship, national origin, veteran's status, marital status, pregnancy, mental or physical disability, age, or any characteristic protected by law.

Workplace Violence Prevention (cont'd)

All threats of (or actual) violence, both direct and indirect, should be reported as soon as possible to any FootBridge manager. This includes threats by employees, as well as threats by clients, vendors, solicitors, or other members of the public. When reporting a threat of violence, it is important to be as specific and detailed as possible. All suspicious individuals or activities should also be reported as soon as possible. Do not place yourself in peril. If you see or hear a commotion or disturbance near your workstation, do not try to intercede or see what is happening.

Any employees who apply for or obtain a protective or restraining order which lists FootBridge locations as being protected areas must provide FootBridge with a copy of the petition and the declarations used to seek the order, a copy of any temporary protective or restraining order which is granted, and a copy of any protective or restraining order which is made permanent. FootBridge understands the sensitivity of this information and will employ confidentiality procedures that recognize and respect the privacy of the reporting employee, while simultaneously taking steps to ensure the safety of all employees.

FootBridge will promptly and thoroughly investigate all reports of threats of (or actual) violence and of suspicious individuals or activities. The identity of the individual making a report will be protected as much as is practical. In order to maintain workplace safety and the integrity of its investigation, FootBridge may suspend employees, either with or without pay, pending investigation or take any other steps, which, at its sole discretion, it deems appropriate.

Anyone determined to be responsible for threats of (or actual) violence or other conduct that is in violation of these guidelines will be subject to prompt disciplinary action up to and including termination of employment and possible civil or criminal action.

FootBridge encourages employees to bring their disputes or differences with other employees to the attention of their manager. Footbridge is eager to assist in the resolution of employee disputes, and will not discipline employees for raising such concerns.

To ensure orderly operations and provide the best possible work environment, FootBridge expects employees to follow rules of conduct that will protect the interests and safety of all employees and FootBridge.

It is not possible to list all the forms of behavior that are considered unacceptable in the workplace. The following are examples of infractions of conduct rules that may result in disciplinary action, up to and including termination of employment:

Employee Conduct and Work Rules

- Theft, vandalism or inappropriate removal or possession of client property.
- Public embarrassment of The FootBridge Companies or client company.
- Falsification of FootBridge or client records.
- Reporting to work under the influence of alcohol or illegal drugs.
- Unethical conduct or conflicts of interest.
- Possession, distribution, sale, transfer, or use of alcohol or illegal drugs in the workplace, while on duty, or while operating vehicles during business hours.
- Gross negligence or improper conduct leading to damage of FootBridge-owned or client-owned property.
- Gross insubordination.
- Violation of safety or health rules.
- Sexual or other unlawful or unwelcome harassment or discrimination.
- Possession of dangerous or unauthorized materials, such as explosives or firearms, in the workplace.
- Using threatening language.
- Unexcused absenteeism or tardiness.
- Failing to report personal injury.
- Unauthorized use of a client company vehicle.
- Speeding or reckless driving in a client company vehicle or while on company business, including "road rage."
- Conviction of a crime.

Progressive Discipline

The purpose of this policy is to state FootBridge's position on administering equitable and consistent discipline for unsatisfactory conduct in the workplace. FootBridge's own best interest lies in ensuring fair treatment of all employees and in making certain that disciplinary actions are prompt, uniform and impartial. The major purpose of any disciplinary action is to correct the problem, prevent recurrence and prepare the employee for satisfactory service in the future.

Disciplinary action may call for any of four steps -- verbal warning, written warning, suspension with or without pay, or termination of employment -- depending on the severity of the problem

Progressive Discipline (cont'd)

and the number of occurrences. There may be circumstances when one or more steps are bypassed

Progressive discipline means that, with respect to most disciplinary problems, these steps may be followed: a first offense may call for a verbal warning; a next offense may be followed by a written warning; another offense may lead to a suspension; and, still another offense may then lead to termination of employment.

FootBridge recognizes that there are certain types of employee problems that are serious enough to justify either a suspension or, in extreme situations, termination of employment, without going through the usual progressive discipline steps.

While it is impossible to list every type of behavior that may be deemed a serious offense, the Employee Conduct and Work Rules policy includes examples of problems that may result in immediate suspension or termination of employment. However, the problems listed are not all necessarily serious offenses, but may be examples of unsatisfactory conduct that will trigger progressive discipline.

By using progressive discipline, we hope that most employee problems can be corrected at an early stage, benefiting both the employee and The FootBridge Companies.

Problem Resolution Procedure

If employees disagree with established rules of conduct, policies, or practices, they can express their concern through the problem resolution procedure.

No employee will be penalized, formally or informally, for voicing a complaint with The FootBridge Companies in a reasonable, business-like manner, or for using the open door policy. This policy applies to employees and departing or former employees. If a situation occurs when employees or former employees believe that condition of employment or a decision affecting them is unjust or inequitable, they are encouraged to speak with their manager. If their direct manager is unavailable or an employee believes it would be inappropriate to contact their direct manager, such employee may present the issue to the Human Resources Manager of FootBridge Companies. At such time, the appropriate Manager or Human Resources Manager will direct the employee to outline the problem in writing. The Manager or Human Resources Manager will then review the problem as well as make any adjustment deemed appropriate to resolve the problem.



GENERAL SAFETY RULES

The FootBridge Companies has developed these safety rules patterned after the Federal OSHA requirements. Read and become familiar with these rules, and other safety rules that apply to your job.

1. Report an injury to your employer / supervisor immediately.
2. Report any observed unsafe condition to your employer / supervisor.
3. Horseplay is prohibited at all times.
4. The drinking of alcoholic beverages is not permitted on the job. Any employee discovered under the influence of alcohol or drugs will not be permitted to work.
5. If you do not have current First Aid Training, do not move or treat an injured person unless there is an immediate peril, such as profuse bleeding or stoppage of breathing.
6. Appropriate clothing and footwear must be worn on the job at all times.
7. Where there exists the hazard of falling objects, an approved hard hat must be worn.
8. You should not perform any task unless you are trained to do so and are aware of the hazards associated with that task.
9. You may be assigned certain personal protective safety equipment. This equipment should be available for use on the job, maintains in good condition, and worn when required.
10. Learn safe work practices. When in doubt about performing a task safely, contact your supervisor for instruction and training.
11. The riding of a hoist hook, or on other equipment not designed for such purposes, is prohibited at all times.
12. Never remove or by-pass safety devices.
13. Do not approach operating machinery from the blind side; let the operator see you.
14. Learn where fire extinguishers and first aid kits are located.
15. Maintain a general condition of good housekeeping in all work areas at all times.
16. Obey all traffic regulations when operating vehicles on public highways.
17. When operating or riding in company vehicles or using your personal vehicle for business purposes, the vehicle's seatbelt shall be worn.
18. Be alert to hazards that could affect you and your fellow employees.
19. Obey safety signs and tags.
20. Always perform your assigned task in a safe and proper manner; do not take shortcuts. The taking of shortcuts and the ignoring of established safety rules is a leading cause of employee injury.

Mass State Security Compliance Plan

~ All FootBridge employees must adhere to the following rules and regulations when handling any Massachusetts residents 'personal information'. For purposes of this document **"personal information"** means a Massachusetts resident's first name and last name or first initial and last name in combination with any one or more of the following data elements that relate to such resident: (a) Social Security Number; (b) Driver's License Number or State –Issued Identification Card Number; or (C) Financial Account Number, or Credit or Debit Card Number.

- The amount of personal information collected must be limited to that amount reasonably necessary to accomplish our legitimate business purposes, or necessary to us to comply with other state or federal regulations. – SSN, Tax ID #, Drivers License or State ID card, Financial Account #, debit or Credit Card # should only be asked for and recorded when absolutely necessary in order to conduct legitimate business.
- Access to records containing personal information shall be limited to those persons who are reasonably required to know such information in order to accomplish your legitimate business purpose or to enable us comply with other state or federal regulations. – Any requests for personal information from any other person, must be justified as reasonable business procedure.
- Employees are encouraged to report any suspicious or unauthorized use of customer information.
- It is your individual responsibility to report any incident that you recognize as a breach of security of this plan to your ON-SITE MANAGER.
- Employees are prohibited from keeping open files containing personal information on their desks when they are not at their desks. – All files containing personal information **MUST** be closed and put away **BEFORE** walking away from your desk.
- At the end of the work day, all files and other records containing personal information must be secured in a manner that is consistent with ensuring the safety of personal information. – **ALL** files containing personal information **MUST** be stored in a locked or secure area at the end of your workday.
- Records containing Personal Information should be printed **ONLY** if necessary for business purposes. – You must retrieve any printed document containing an Employees personal Information from the printer, copier or fax machine immediately after printing. Do not leave fax machine unattended if you are transmitting Personal Information. All documents printed or copied accidentally **MUST** be **DESTROYED/** shredded immediately.
- Access to such records is to be restricted. – Only employees who are authorized to handle files containing personal information should be allowed in restricted areas.

Please Initial _____

- Records and data must be stored in locked facilities, secure storage areas or locked containers.
- Access to electronically stored personal information shall be electronically limited to those employees having a unique log-in ID. – Never share your password with anyone else.
- Re-log-in shall be required when a computer has been inactive for long period of time. – You **MUST** log off or lock your computer when you leave for lunch, meetings or end of day.

Please sign this document in agreement to follow these rules and procedures as described in this Plan.

Employee Name (please print)

Employee Signature

Date