

**Employee**

**Policy Manual**

w w w . a d v a n t u s . c o m

Revised 7.12.24

**Table of Contents**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Introductory Statement | | | | |  |  | 3 |
|  | Employee Acknowledgement Form | | | | |  |  | 4 |
|  | Welcome to Advantus | | | | |  |  | 5 |
|  | Nature Of Employment | | | | |  |  | 5 |
|  | Equal Employment Opportunity | | | | |  |  | 6 |
|  | Immigration Law Compliance | | | | |  |  | 6 |
|  | Disability Accommodation | | | | |  |  | 7 |
|  | Employee Relations | | | | |  |  | 8 |
|  | Open Door | | | | |  |  | 8 |
|  | Conflicts of Interest | | | | |  |  | 9 |
|  | Outside Employment | | | | |  |  | 9 |
|  | Confidentiality Agreement | | | | |  |  | 10 – 11 |
|  | Employee Conduct and Work Rules | | | | |  |  | 12 |
|  | Employment Categories | | | | |  |  | 13 |
|  | Dress Code | | | | |  |  | 14 |
|  | Access to Personnel Files | | | | |  |  | 15 |
|  | Employee Privacy | | | | |  |  | 16 - 18 |
|  | Introductory Period | | | | |  |  | 19 |
|  | Performance Evaluation | | | | |  |  | 20 |
|  | Employee Benefits | | | | |  |  | 21 |
|  | Benefits Continuation (COBRA) | | | | |  |  | 21 |
|  | Family & Medical Leave (FMLA) | | | | |  |  | 22 - 23 |
|  | Personal Leave of Absence | | | | |  |  | 24 – 25 |
|  | Parental Leave | | | | |  |  | 26 - 27 |
|  | Military Leave/Civil Air Patrol Leave | | | | |  |  | 28 – 29 |
|  | Domestic Violence Leave | | | | |  |  | 29 – 30 |
|  | Witness Duty Leave | | | | |  |  | 30 |
|  | Tuition Reimbursement | | | | |  |  | 31 - 33 |
|  | Time Off & Attendance | | | | |  |  | 34 - 36 |
|  | Work from Home & Flex Schedule | | | | |  |  | 37 – 40 |
|  | Offsite Equipment | | | | |  |  | 40 - 41 |
|  | Holidays | | | | |  |  | 42 |
|  | Timekeeping & Rest and Meal Periods | | | | |  |  | 43 |
|  | Overtime & Pay Deductions and Garnishments | | | | |  |  | 44 |
|  | Information Technology | | | | |  |  | 45 – 50 |
|  | Artificial Intelligence Tool Use  Social Media  Cell Phone Use | | | | |  |  | 51 – 52  53  54 |
|  | Cell Phone Allowance | | | | |  |  | 55 – 56 |
|  | Visitors in the Workplace | | | | |  |  | 57 |
|  | Safety | | | | |  |  | 58 |
|  | Workplace Violence Prevention | | | | |  |  | 59 |
|  | Hurricane Preparation and Recovery Plan | | | | |  |  | 60 – 63 |
|  | Non-Discrimination & Harassment | | | | |  |  | 64 – 66 |
|  | Drug-Free Workplace | | | | |  |  | 67 – 74 |
|  | Medical Marijuana Use | | | | |  |  | 75 |
|  | Alcohol Consumption at Company Functions | | | | |  |  | 76 |
|  | Personal Use of Vehicles | | | | |  |  | 77 |
|  | Distracted Driving | | | | |  |  | 78 |
|  | Employee Travel | | | | |  |  | 79 – 83 |
|  | Corporate Credit Cards | | | | |  |  | 84 |
|  | Employee Purchase Program & PTO Sharing Program | | | | |  |  | 85 |
|  | Employment Termination & Return of Property | | | | |  |  | 86 |
|  |  | | | | |  |  |  |
|  |  | | | | |  |  |  |
|  |  |  |  |  |
|  |  | | | | |  |  |  |

**Introductory Statement**

This handbook is designed to acquaint you with Advantus and provide you with information about working conditions, employee benefits, and some of the policies affecting your employment. You should read, understand, and comply with all provisions of the handbook. It describes many of your responsibilities as an employee and outlines the programs developed by Advantus to benefit employees. One of our objectives is to provide a work environment that is conducive to both personal and professional growth.

No employee handbook can anticipate every circumstance or question about policy. As Advantus continues to grow, the need may arise and Advantus reserves the right to revise, supplement, or rescind any policies or portion of the handbook from time to time as it deems appropriate, in its sole and absolute discretion. Employees will, of course, be notified of such changes to the handbook as they occur.

We operate in numerous states within the United States. State, local, and federal employment laws change with some frequency, either as a result of a judicial decision or new legislation or regulations. Although we seek to monitor the laws in all states where we have employees, our Handbook may not always reflect the very latest requirements. We are, of course, committed to complying with all applicable laws. If you have specific questions, please contact our Human Resources Department.

**Employee Acknowledgement Form**

The employee policy manual describes important information about Advantus Corp., and I understand that I should consult the Human Resources Department regarding any questions not answered in the manual.

I have entered my employment relationship with Advantus voluntarily and acknowledge that there is no specified length of employment. Accordingly, either I or Advantus can terminate the relationship at will, with or without cause, at any time, so long as there is no violation of applicable federal or state law.

Since the information, policies, and benefits described here are necessarily subject to change, I acknowledge that revisions to the manual may occur, except to Advantus' policy of employment-at-will. All such changes will be communicated through official notices, and I understand that revised information may supersede, modify, or eliminate existing policies. Only the President of Advantus can adopt any revisions to the policies in this manual.

Furthermore, I acknowledge that this manual is neither a contract of employment nor a legal document. I have received the manual, and I understand that it is my responsibility to read and comply with the policies contained in this manual and any revisions made to it.

EMPLOYEE'S NAME (printed): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

EMPLOYEE'S SIGNATURE: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

DATE: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Welcome to Advantus!**

It is our pleasure to welcome you to Advantus. We are a creative team dedicated to high standards of excellence and quality. We value each one of our employees, and we hope that you find your work here rewarding and satisfying.

With product lines whose histories stretch all the way back to 1878, Advantus Corp. is a diverse consumer products company comprised of five operating divisions, each of which contain a family of related businesses and product lines:

* Office Products
* Craft & Hobby Products
* Home & Office Organization
* Pool & Recreation Products
* Luggage & Tactical Products

We manufacture and distribute over 5,500 consumer products in our manufacturing facilities in Florida, Virginia, Wisconsin and Asia, and over 100 manufacturing and distribution partners around the globe. Our more than 600,000 square feet of owned, domestic manufacturing and warehousing capacity in the U.S. is conveniently located near some of the country’s busiest seaports for efficient distribution to our customers around the world.

This tremendous capacity, combined with that of our strategic partners around the U.S., enables us to take these families of products and distribute them to a diverse set of key customer partners.

**Nature of Employment**

Employment with Advantus is voluntarily entered, and the employee is free to resign at will at any time, with or without cause. Similarly, Advantus may terminate the employment relationship at will at any time, with or without notice or cause, so long as there is no violation of applicable federal or state law.

Policies set forth in this handbook are not intended to create a contract, nor are they to be construed to constitute contractual obligations of any kind or a contract of employment between Advantus and any of its employees. The provisions of the handbook have been developed at the discretion of management and, except for its policy of employment-at-will, may be amended or cancelled at any time, at Advantus' sole discretion.

These provisions supersede all existing policies and practices and may not be amended or added to without the express written approval of the President of Advantus.

**Equal Employment Opportunity**

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at Advantus will be based on merit, qualifications, and abilities. Advantus does not discriminate in employment opportunities or practices based on race, color, religion, sex (including pregnancy, sexual orientation or gender identity), national origin, age, or genetic information. This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training.

Any employees with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their immediate supervisor or the Human Resources Department. Employees can raise concerns and make reports without fear of reprisal. Anyone found to be engaging in any type of unlawful discrimination will be subject to disciplinary action, up to and including termination of employment.

**Immigration Law Compliance**

Advantus is committed to employing only United States citizens and aliens who are authorized to work in the United States and does not unlawfully discriminate based on 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 Advantus within the past three years, or if their previous I-9 is no longer retained or valid.

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

**Disability Accommodation**

Advantus Corp. is committed to complying with all applicable provisions of the Americans with Disabilities Act (ADA) and ensuring equal opportunity in employment for qualified persons with disabilities. It is Company policy not to discriminate against any qualified employee or applicant regarding any terms or conditions of employment because of such individual's disability or perceived disability so long as the employee can perform the essential functions of the job. Consistent with this policy of nondiscrimination, the Company will provide reasonable accommodations to a qualified individual with a disability, as defined by the ADA, who has made the Company aware of his or her disability, provided that such accommodation does not constitute an undue hardship on the Company.

Employees with a disability who believe they need a reasonable accommodation to perform the essential functions of their job should contact the Human Resources Department. Advantus Corp. encourages individuals with disabilities to come forward and request reasonable accommodation.

Procedure for Requesting Accommodation:

Upon receipt of an accommodation request, the Human Resources Department and your supervisor will meet with you to discuss and identify the precise limitations resulting from the disability and the potential accommodation that Advantus might make to help overcome those limitations.

Advantus Corp. will determine the feasibility of the requested accommodation considering various factors, including, but not limited to, the nature and cost of the accommodation, and the accommodation's impact on the operation of the Company, including its impact on the ability of other employees to perform their duties and on Advantus' ability to conduct business.

Advantus will inform the employee of its decision on the accommodation request or on how to make the accommodation. If the accommodation request is denied, employees will be advised of their right to appeal the decision by submitting a written statement explaining the reasons for the request. If the request on appeal is denied, that decision is final.

The ADA does not require Advantus to make the best possible accommodation, to reallocate essential job functions, or to provide personal use items (i.e., eyeglasses, hearing aids, wheelchairs, etc.)

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

**Employee Relations**

Advantus is committed to providing the best possible working conditions for its employees. Part of this commitment is encouraging an open and frank atmosphere in which any problem, complaint, suggestion, or question receives a timely response from Advantus supervisors and management.

Advantus strives to ensure fair and honest treatment of all employees. Supervisors, managers, and employees are expected to treat each other with mutual respect. Employees are encouraged to offer positive and constructive criticism.

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 Advantus in a reasonable, business-like manner, or for using the problem resolution procedure.

If a situation occurs when employees believe that a condition of employment or a decision affecting them is unjust or inequitable, they are encouraged to make use of the Open-Door Policy as outlined in the following pages.

**Open Door**

The purpose of the Open-Door Policy is to promote understanding and resolution of problems encountered by employees in the daily performance of their duties. To achieve this result, Advantus seeks to identify and correct the causes of employee dissatisfaction and ensure that all employees receive fair and equitable treatment. Most concerns should be settled on an informal basis by bringing them to the attention of the immediate supervisor. It is the responsibility of the immediate supervisor to investigate the concern and attempt to resolve it informally. The following procedure should be used when a solution cannot be accomplished on an informal basis:

**STEP I** An employee having a concern that was not resolved initially by the immediate supervisor, will then speak to the supervisor's respective supervisor. The problem will be investigated promptly, and an answer will be provided to the employee within a one-week period.

**STEP II** Should the concern remain unresolved at this point, the employee should submit the concern directly to HR. A meeting will be arranged with the employee, and an attempt will then be made to solve the problem. After consulting with the appropriate individuals, a resolution will be given to the employee within two weeks after the meeting.

It is extremely important that harmony and job satisfaction be achieved and maintained for all employees, but it is equally important that rules and regulations governing their work and conduct be understood and followed. There will be no retaliation against any employee because he or she presents a problem. If it is believed that there has been retaliation as a result of presenting a problem, report the matter directly and immediately to HR.

**Conflicts of Interest**

As an employee of Advantus, you have the obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. In this policy, Advantus is establishing the framework within which we wish to operate. These guidelines are intended to provide a general direction so that you can get further clarification on areas that affect you. For more information or questions on conflict of interest, contact the Human Resources Department.

An actual or potential conflict of interest occurs when an employee can influence a decision that may result in a personal gain for that employee or for a relative as a result of business dealings with Advantus. For the purposes of this policy, we define a relative as any person who is related by blood or marriage, or whose relationship with the employee is like that of persons who are related by blood or marriage.

There is no "presumption of guilt" created by the mere existence of a relationship with outside firms. However, if you have any influence on transactions involving purchases, contracts, or leases, it is imperative that you disclose this fact to an officer of Advantus as soon as possible. By alerting us to the existence of any actual or even a potential conflict of interest, we can establish safeguards to protect all parties.

The potential for personal gain is not limited to situations where an employee or relative has a significant ownership in a firm with which Advantus does business. Personal gains can also result from situations where an employee or relative receives a kickback, bribe, substantial gift, or special consideration because of a transaction or business dealings involving Advantus.

**Outside Employment**

Employees may hold outside jobs if they meet the performance standards of their job with Advantus. All employees will be judged by the same performance standards and will be subject to Advantus' scheduling demands, regardless of any existing outside work requirements.

If Advantus determines that an employee's outside work interferes with performance or the ability to meet the requirements of Advantus as they are modified from time to time, the employee may be asked to terminate the outside employment if he or she wishes to remain with Advantus.

Outside employment that constitutes a conflict of interest is prohibited. Employees may not receive any income or material gain from individuals outside Advantus for materials produced or services rendered while performing their jobs.

**Confidentiality Agreement**

In consideration of my employment with Advantus Corporation, Inc. (the "company"), I agree:

* Except as the company may otherwise consent in writing, not to disclose to any person or entity at any time, in whole or in part, either during or subsequent to my employment with the Company any information, knowledge, or data of the Company I may receive or develop during the course of my employment with the Company, including but not limited to any information, knowledge or data relating to computer equipment and systems, software, source codes, design coding, programs, processes, procedures, and methods of operation, business, marketing, sales, finances, products, and services, customer lists, inventions, discoveries or other matters which are of a secret or confidential nature (The "Confidential Information"). Confidential information shall not include information that is in the public domain without breach of any obligation to the Company by me or any other person or entity.
* To use Confidential Information only in the course of my employment as directed by the Company.
* Not to use for my own personal use or benefit or the use or benefit of any other person or entity all or any part of the Confidential Information.
* Not to remove any Confidential Information, directly or indirectly, by any means or manner from the premises of the Company.
* To return to the Company all Confidential Information I may have in my possession upon termination of my employment and not to keep or retain in any form or manner, in whole or in part, any such Confidential Information.
* To notify the Company in writing simultaneously with my execution at this Agreement of any rights I claim in any invention, discovery or idea conceived by me or others prior to the date of this Agreement which may conflict with any rights or property of the Company. In the event of my failure to give such written notice, the Company may assume that no such conflicting invention, discovery or idea exists, and I agree that I will make no claims against the Company with respect to the use of any such invention, discovery or idea and any work or the product of any work which I have performed or caused to be performed for the Company.
* All work I perform and all inventions, ideas, discoveries, developments, improvements and property, whether tangible or intangible, I work on, create or develop during my employment with the Company that relate or are like the Company's business or Confidential Information, whether developed during Company work hours, or during my free time or with Company resources or equipment of my or any other person's resources or equipment, shall be and remain the property of the Company. Upon request of the Company, I agree to sign such documents as the Company may request to indicate the Company's ownership of such property.
* In the event my violations of any of the forgoing provisions, I acknowledge and agree that monetary damages are totally inadequate and, therefore, the Company is entitled to seek and obtain injunctive relief without the posting of any bond or security to obtain the entry of temporary, preliminary and/or permanent injunctions and orders of specific performance enforcing the provisions of this Agreement.
* In the event of my breach of this Agreement, I agree to pay all reasonable attorneys' fees and costs incurred by the Company in the enforcement of any provision of this Agreement with or without suit.
* This Confidentiality Agreement shall be governed by the laws of the State of Florida.
* My obligations hereunder are independent of any other obligations between myself and the Company, and the Company may enforce this Agreement regardless of any claim I may have against the Company.
* Waiver of any term or condition of this Agreement may only be made in writing executed by the Company. Any such waiver shall not waive, or affect the enforceability of, any other term or condition or subsequent violation of the same term or condition waived.
* Nothing in this Agreement shall affect or modify my employment with the Company as an at-will employee, including without limitation my right or the Company's right to terminate my employment at any time for any reason.
* This Confidentiality Agreement constitutes my entire agreement with respect to the subject matter hereof and may not be amended or modified except in writing executed by myself and the Company.

**12.27.2023**

**Employee Conduct and Work Rules**

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

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 rules of conduct that may result in disciplinary action, up to and including termination of employment:

1. Reckless or willful damage to company property or to the property of coworkers, customers, or any other person.
2. Unauthorized removal of Company property from the Company premises. Theft of company property or the property of another employee.
3. Excessive tardiness or absenteeism.
4. Discriminating against or harassing another employee, customer, or any other person in violation of Company policy and/or state, federal, or local law.
5. Refusal to perform work as directed by a supervisor or any other act of insubordination.
6. Possession or use of alcoholic beverages on Company property, or using alcoholic beverages while engaged in Company business off the premises, except where authorized. Reporting/returning to work under the influence of alcohol or any other substance.
7. Illegally manufacturing, possessing, using, selling, distributing, or transporting drugs, including the misuse of prescription drugs.
8. Falsifying employment applications, other employment records, or any other Company document, including, but not limited to security clearance documents, accounting forms, and personnel records.
9. Willful violation or disregard of safety, health, fire, security or employment regulations, signs and notices.
10. Permitting another person to falsely use your badge or identification card or your using someone else’s badge or identification card.
11. Possessing knives, firearms, or other weapons on company property without Company authorization.
12. Clocking or checking in for someone else or having someone else clock in or check in for you.
13. Fighting or using obscene, abusive, or threatening language or gestures.
14. Failing to maintain the confidentiality of Company, customer, or client information

Employment with Advantus is at the mutual consent of Advantus and the employee, and either party may terminate that relationship at any time, with or without cause, and with or without advance notice.

**Employment Categories**

It is the intent of Advantus to clarify the definitions of employment classifications so that employees understand their employment status and benefit eligibility. These classifications do not guarantee employment for any specified period. Accordingly, the right to terminate the employment relationship at will at any time is retained by both the employee and Advantus.

Each employee is designated as either NONEXEMPT or EXEMPT from federal and state wage and hour laws. NONEXEMPT employees are entitled to overtime pay under the specific provisions of federal and state laws. EXEMPT employees are excluded from specific provisions of federal and state wage and hour laws.

In addition to the above categories, each employee will belong to one other employment category:

FULL-TIME employees are those who are not in a temporary or introductory status and who are regularly scheduled to work Advantus' full-time schedule. Generally, they are eligible for Advantus' benefit package, subject to the terms, conditions, and limitations of each benefit program.

PART-TIME employees are those who are not assigned to a temporary or introductory status and who are regularly scheduled to work less than 30 hours per week. While they do receive all legally mandated benefits (such as Social Security and workers' compensation insurance), they are ineligible for all of Advantus' other benefit programs.

TEMPORARY employees are those who are hired as interim replacements, to temporarily supplement the work force, or to assist in the completion of a specific project. Employment assignments in this category are of a limited duration. Employment beyond any initially stated period does not in any way imply a change in employment status. Temporary employees retain that status unless and until notified of a change. While temporary employees receive all legally mandated benefits (such as workers' compensation insurance and Social Security), they are ineligible for all of Advantus' other benefit programs.

TEMPORARY – TO- PERMANENT employees are those who are hired temporarily and then offered that position on a permanent basis after a designated number of work hours has been completed. While temporary employees receive all legally mandated benefits (such as workers' compensation insurance and Social Security), they are ineligible for all of Advantus' other benefit programs. Once employees become permanent, they are eligible for Advantus’ benefit package, subject to the terms, conditions, and limitations of each benefit program.

**Dress Code**

ADVANTUS wants to project an image reflective of our professionalism and status as a corporate enterprise. Due to the nature of the business, there will be a separate dress code for corporate headquarters and the warehouse as follows:

### Corporate Headquarters

1. Casual/Business-Casual
2. **The following are not permitted:**
   * Shorts - must beof an acceptable nature in terms of length and style *(clean; pressed; no cutoffs;* *4 inches above the knee minimum length).*
   * Form fitting pants *(spandex, sweatpants, leggings, yoga pants, etc.)*
   * Revealing sports wear
   * Flip flops (this does not include sandals)
   * Halter tops or tube tops
   * Extremely short skirts *(4 inches above the knee maximum)*
   * Dresses or tops with low cut front or back
   * Blouses or shirts that expose the midriff or back area.
   * Strapless dresses or tops
   * Baseball caps
3. Blue jeans are generally acceptable. Please use good judgment when wearing jeans (no rips, tears or holes even if it is the latest fashion trend).

**Warehouse Dress Code:**

1. No open toed shoes of any kind at any time (includes those visiting from corporate)
2. No jewelry on hands or arms when operating circular powered equipment
3. No long sleeve shirts allowed when operating circular powered equipment
4. Safety glasses required when operating saws and drill presses
5. No sunglasses or dark glasses of any kind are to be worn while working
6. Shorts are acceptable in most areas but must be no more than 4" above the knee
7. No revealing or tight-fitting clothes of any kind
8. Tee shirts and other tops are allowed if they are in good taste.
9. Any decal or imprint that offends any fellow employee will not be allowed
10. No halter tops or tube tops

The Company takes into consideration what is considered acceptable attire and grooming by the general public ineach area. Your manager has the authority, responsibility and discretion to make the ultimate decision as to what is acceptable. If you are found in violation of the dress code, you may be asked to go home and change. The resulting time away from work would be unpaid time. If you continue to violate the dress code, you will be subject to additional disciplinary action up to and including termination of employment.

**Access to Personnel Files**

Advantus maintains a personnel file on each employee. The personnel file includes such information as the employee's job application, resume, records of training, documentation of performance appraisals and salary increases, and other employment records.

Personnel files are the property of Advantus, and access to the information they contain is restricted. Generally, only supervisors and management personnel of Advantus who have a legitimate reason to review information in a file are allowed to do so.

Employees who wish to review their own file should contact the Human Resources Department. With reasonable advance notice, employees may review their own personnel files in Advantus' offices and in the presence of an individual appointed by Advantus to maintain the files.

It is important that Advantus have certain personal information about you in our records. Please notify the Human Resources department if there is a change to your mailing address, telephone numbers, marital status, dependents' information, educational accomplishments, and other possibly related information. We also need to have information about who to contact in case of an emergency.

Personal information may also be updated via the ADP Portal. Contact the Human Resources Department for instructions on how to register and use the portal.

Employee Privacy

The privacy and security of your personal data (the “Personal Information”) which we collect from you is important to us. It is equally important that you understand how we handle this data.

By accepting employment with Advantus Corp, you expressly acknowledge that you have read, understand and agree to all the terms of this Privacy Policy as outlined below and as it may be modified by us from time to time with or without prior notice.

## **Collection of Information**

While conducting our business and complying with federal, state, and local government regulations governing such matters as employment, tax, insurance, etc., we must collect Personal Information from you. The nature of the Information collected varies somewhat for each employee, depending on your employment responsibilities, your citizenship, the location of the facility where you work, and other factors. We collect Personal Information from you solely for business purposes, including those related directly to your employment with the Company, and those required by governmental agencies.

Data collected may include, without limitation, such things as:

* Your name
* User ID(s)
* Phone numbers
* Email address (es)
* Mailing addresses
* Banking and other financial data
* Government identification numbers, e.g., Social Security number, driver’s license number
* Date of birth
* Gender, race, and ethnicity
* Health and disability data
* Family-related data, e.g., marital status,
* Personal and health -related data for you and your family
* Trade union data

Anyone who sends unsolicited requests to the Company by any means, e.g., mail, email, fax, expressly consents to the storage, destruction, processing, or disclosure of the data, as well as any other reasonable business-related use by the Company or any government agency of the unsolicited data.

We do monitor employee use of the Internet in order to detect access to inappropriate websites or other misuse of the Company’s computer network. We also use email filters to block spam and computer viruses. These filters may from time to time block legitimate email messages.

The Company will not knowingly collect or use Personal Data in any manner not consistent with this Policy, as it may be amended from time to time, and applicable laws.

**Because the Personal Information collected by the Company is necessary for business purposes, you are required to provide it. Your refusal or failure to provide the requested Personal Information may, therefore, disqualify you from employment with Advantus Corp or from receipt or enjoyment of certain Company benefits.**

## **Use of the Information We Collect**

The primary purposes for collection, storage and/or use of your Personal Information include, but are not limited to:

* **Human Resources Management.** Wecollect, store, analyze, and share (internally) Personal Information in order to attract, retain and motivate a highly qualified workforce. This includes recruiting, compensation planning, succession planning, reorganization needs, performance assessment, training, employee benefit administration, compliance with applicable legal requirements, and communication with employees and/or their representatives.
* **Business Processes and Management.** Personal Information is usedto run our business operations including, for example, scheduling work assignments, managing company assets, reporting and/releasing public data (e.g., Annual Reports, etc.); and populating employee directories. Information may also be used to comply with government regulation.
* **Safety and Security Management.** We use such Information as appropriate to ensure the safety and protection of employees, assets, resources, and communities.
* **Communication and Identification.** We use your Personal Information to identify you and to communicate with you.

## **Disclosure of Data**

The Company acts to protect your Personal Information and ensure that unauthorized individuals do not have access to your Information by using security measures to protect Personal Information. We will not knowingly disclose, sell or otherwise distribute your Personal Information to any third party without your knowledge and, where appropriate, your express written permission, except under the following circumstances.

* **Legal requests and investigations.** We may disclose your Personal Information when such disclosure is reasonably necessary (i) to prevent fraud; (ii) to comply with any applicable statute, law, rule or regulation; or (iii) to comply with a court order.
* **Third-party vendors and service providers.** We may, from time to time, outsource services, functions, or operations of our business to third -party service providers. When engaging in such outsourcing, it may be necessary for us to disclose your Personal Information to those service providers, e.g., a payroll service, a benefits provider. In some cases, the service providers may collect Personal Information directly from you on our behalf. We will work with any such providers to restrict how the providers may access, use and disclose your Information.
* **Business Transfers**: During the term of your employment, we may buy other companies, create new subsidiaries or business units or sell part or all of the Company or its assets. It is likely that some or all of your Personal Information will be transferred to another company as part of any such the transaction. However, your Personal Information will remain subject to protection outlined in the then current Privacy Policy.
* **Protection of Company and Other.** We may release Personal Information when we believe release is necessary to comply with the law; enforce or apply our policies and other agreements; or protect the rights, property, or safety of Company, our employees, or others. This disclosure will never, however, include selling, renting, sharing or otherwise disclosing your Personal Information for commercial purposes in violation of the commitments set forth in this Privacy Policy.

## **Security of Your Personal Information**

We employ reasonable security measures and technologies, such as password protection, encryption, physical locks, etc., to protect the confidentiality of your Personal Information Only authorized employees have access to Personal Information. If you are an employee with such authorization, it is imperative that you take the appropriate safeguards to protect such Information.

Paper and other hard copy containing Personal Information (or any other confidential information) should be secured in a locked location when not in use. Computers and other access points should be secured when not in use by logging out or locking. Passwords and user IDs should be guarded and not shared. When no longer necessary for business purposes, paper and hard copies should be immediately destroyed using paper shredders or similar devices. Do not leave copies in unsecured locations waiting to be shredded or otherwise destroyed. Do not make or distribute unauthorized copies of documents or other tangible medium containing personal data. Electronic files containing Personal Information should only be stored on secure computers and not copied or otherwise shared with unauthorized individuals within or outside of Company.

The Company will make reasonable efforts to secure Personal Information stored or transmitted electronically secure from hackers or other persons who are not authorized to access such Information.

Compliance with this Privacy Policy is important to the Company. Any violation or potential violation of this Policy should be reported to Human Resources. The failure by any employee to follow these privacy policies may result in discipline up to and including discharge of the employee. Any questions or suggestions regarding this policy may also be directed to Human Resources.

## **Updating and Accessing Your Personal Data**

You must promptly inform us when changes occur in the Personal Information you have provided so that we can maintain accurate Information about you. Although you may update or change your Information, we may maintain such Personal Information previously submitted in historical archives.

All employees can access and change their Personal Information through ADP Employee Portal. You may also contact the Human Resources Department to submitchanges*.*

**09.12.2017**

**Introductory Period**

The introductory period is intended to give new employees the opportunity to demonstrate their ability to achieve a satisfactory level of performance and to determine whether the new position meets their expectations. Advantus uses this period to evaluate employee capabilities, work habits, and overall performance.

All new and rehired employees work on an introductory basis for the first 90 calendar days after their date of hire. Employees who are promoted or transferred within Advantus must complete a secondary introductory period of the same length with each reassignment to a new position. Any significant absence will automatically extend an introductory period by the length of the absence. If Advantus determines that the designated introductory period does not allow sufficient time to thoroughly evaluate the employee's performance, the introductory period may be extended for a specified period.

In cases of promotions or transfers within Advantus, an employee who, in the sole judgment of management, is not successful in the new position can be removed from that position at any time during the secondary introductory period. If this occurs, the employee may be allowed to return to his or her former job or to a comparable job for which the employee is qualified, depending on the availability of such positions and Advantus' needs.

Upon satisfactory completion of the initial introductory period, employees enter the "regular" employment classification.

During the initial introductory period, new employees are eligible for those benefits that are required by law, such as workers' compensation insurance and Social Security. After becoming regular employees, they may also be eligible for other Advantus-provided benefits, subject to the terms and conditions of each benefits program. Employees should read the information for each specific benefits program for the details on eligibility requirements.

Benefits eligibility and employment status are not changed during the secondary introductory period that results from a promotion or transfer within Advantus.

**Performance Evaluation**

Supervisors and employees are strongly encouraged to discuss job performance and goals on an informal, day-to-day basis. Additional formal performance evaluations are conducted to provide both supervisors and employees the opportunity to discuss job tasks, identify and correct weaknesses, encourage and recognize strengths, and discuss positive, purposeful approaches for meeting goals.

**90 Day Review** – New employees will be evaluated upon the completion of the 90-day introductory period, using the 90 Day Review Form. Employees will be evaluated prior to the end of the introductory period. The appraisal will be completed by the direct supervisor and approved by the department head prior to discussing with the employee.

Employees who transfer to a new position will be evaluated at the end of the 90-day introductory period in the new role. Employees will be evaluated within 2 weeks of the end of the introductory period. The appraisal will be completed by the direct supervisor and approved by the department head prior to discussing with the employee. If it is determined the employee is not a fit for the role, the employee may be moved back to their previous position, or an equivalent position.

**Annual Performance Evaluation** – All employees will be evaluated using the Annual Performance Review on June 1 each year. The appraisal will be completed by the direct supervisor and approved by the department head prior to discussing with the employee.

The Annual Performance Review will include an Employee Input section. Employees will be asked to complete this portion prior to meeting with their supervisor for the review. HR will send the manager both the evaluation and the employee input form. Managers will be responsible for distributing to the employee, along with the date the input form will need completed. Employees should bring the form with them to the review meeting.

**Salary Increases** – Salary increases will be tied directly to performance. The annual increase for each employee will be based on the employee review score and the salary increase grid, which will be published regularly.

**Bonus** – The annual bonus paid to employees will be based on individual performance and company performance. Bonuses will be adjusted to reflect time in position.

**Employee Benefits**

Eligible employees at Advantus are provided a wide range of benefits. Several the programs (such as Social Security, workers' compensation, state disability, and unemployment insurance) cover all employees in the manner prescribed by law.

Benefits eligibility is dependent upon a variety of factors, including employee classification. The Human Resources department can identify the programs for which you are eligible.

The following benefit programs are available to eligible employees:

* + 401(k) Savings Plan
  + Benefit Conversion at Termination
  + Bereavement Leave
  + Dental Insurance
  + Tuition Reimbursement
  + Employee Discounts
  + Family Medical Leave
  + Holidays
  + Jury Duty Leave
  + Voluntary Life Insurance
  + Long-Term Disability
  + Major Medical Insurance
  + Paid Time Off (PTO)
  + Voluntary Short-Term Disability
  + Supplemental Medical Coverage

Refer to the Employee Benefits Summary or Employee Navigator for further details on the comprehensive benefit program offered by Advantus.

**Benefits Continuation (COBRA)**

The federal Consolidated Omnibus Budget Reconciliation Act (COBRA) gives employees and their qualified beneficiaries the opportunity to continue health insurance coverage under Advantus' health plan when a "qualifying event" would normally result in the loss of eligibility.

Some common qualifying events are resignation, termination of employment, or death of an employee; a reduction in an employee's hours or a leave of absence; an employee's divorce or legal separation; and a dependent child no longer meeting eligibility requirements.

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

**Family & Medical Leave (FMLA)**

Advantus provides unpaid family leaves of absence to eligible employees who need to take time off from work duties to meet family obligations that are directly related to childbirth, adoption, or placement of a foster child. Family leave may also be requested to care for a child, spouse, or parent with a serious health condition. A serious health condition is an illness, injury, impairment, or physical or mental condition that involves inpatient care in a hospital, hospice, or residential medical care facility. A serious health condition can also include continuing treatment by a health care provider.

Employees with a qualifying exigency related to the foreign deployment of a military member who is the employee’s spouse, child or parent are also eligible for FMLA. An eligible employee who is a covered servicemember’s spouse, child, parent or next of kin may also take up to 26 weeks of FMLA leave in a single 12-month period to care for the servicemember with a serious injury or illness.

The federal Family and Medical Leave Act (FMLA) covers all employers that employ 50 or more employees during 20 or more work weeks in the current or preceding calendar year with 75 miles of the employee’s worksite. The FMLA requires covered employers to provide eligible employees up to 12 weeks of unpaid, job-protected leave during any 12-month period for childbirth, adoption, or placement of a foster child; to care for a child, spouse, or parent with a serious health condition; or in the case of the employee's own serious health condition.

The Family and Medical Leave Act (FMLA) defines eligible employees as those who have been employed for at least 12 months by a given employer, and who have provided at least 1,250 hours of service (an average of 25 hours a week) during that 12-month period. Eligible employees should make requests for family leave to their supervisors at least 30 days in advance of foreseeable events and as soon as possible for unforeseeable events.

Employees requesting family leave related to the serious health condition of a child, spouse, or parent will be required to submit a health care provider's statement verifying the need for a family leave to provide care, its beginning and expected ending dates, and the estimated time required.

Eligible employees may request up to a maximum of 12 weeks of family leave within any 12-month period. Any combination of family leave and medical leave may not exceed this maximum limit. If this initial period of absence proves insufficient, consideration will be given to a written request for a single extension of no more than 30 calendar days.

Employees will be required to first use any accrued paid leave time before taking unpaid leave. Married employee couples may be restricted to a combined total of 12 weeks leave within any 12-month period for childbirth, adoption, or placement of a foster child; or to care for a parent with a serious health condition.

Subject to the terms, conditions, and limitations of the applicable plans, Advantus will continue to provide health insurance benefits for the full period of the approved family leave. Employees will continue to be responsible for their portion of the monthly premium.

So that an employee's return to work can be properly scheduled, an employee on family leave is requested to provide Advantus with at least two weeks advance notice of the date the employee intends to return to work. When a family leave ends, the employee will be reinstated to the same position, if it is available, or to an equivalent position for which the employee is qualified. If an employee fails to return to work on the agreed upon return date, Advantus will assume that the employee has resigned.

**Personal Leave of Absence**

When sufficient personal or medical reasons require, an employee, at the Company’s sole discretion, may be granted an extended leave of absence without pay. A leave of absence may be granted for an initial period of up to 3 months, and employees may request extensions of up to 3 months which may be granted at the Company's discretion.

Leaves will be without pay except that employees may be required to use any accrued PTO during a leave. However, while on leave of absence, employees will not accrue any paid time off.

The Company will continue to make its regular payment to continue to cover the employee under its group health insurance plan through the end of the month following the month in which the leave begins. Thereafter, an employee on leave may continue his or her benefits under the Company’s group health insurance plan provided the employee pays the entire monthly premiums due during the leave under COBRA continuation of coverage. Employees who wish to continue their insurance coverage should so advise the Company’s HR Department before beginning their leave.

Advantus Corp grants leave with the desire of returning employees to their positions, and will attempt, but not guarantee, reinstatement to the same position or a position with equivalent status, pay, benefits or other employment terms upon the employee’s return from an approved leave. If no such position is available, you may be eligible for rehire if you apply for an available position for which you are qualified and if your prior work history warrants rehire.

Depending on the reason for leave and the employee’s position with the Company, a fitness-for-duty certification completed by the appropriate health care provider may be required to be submitted before the employee returns to work.

**Procedure for Requesting Leave and/or Extension of Such Leave**

If you need a leave of absence, you must file a written request for your leave with the HR Department. Unless otherwise stated, this written request, together with any required supporting documentation, must be submitted at least 30 days before the date on which your requested leave is to begin, unless the need for a leave is not sufficiently foreseeable to give such notice. In that case, you must submit the written request and supporting documentation as soon as practicable. If the leave is foreseeable, the employee shall make a reasonable effort to schedule any planned leave so as not to unduly disrupt the Company's operations.

A leave of absence, or any extension of a leave, must be approved by your department manager and the HR Department.

If the Company grants you a leave of absence, your leave will begin on the first workday which you miss as a result of the emergency or other situation requiring the leave. Should you request an extension of your leave of absence, you must furnish the HR Department with a written request for an extension before the expiration of the original leave of absence or most recent extension. The Company may request documentation, including certification by a medical doctor (or other appropriate health care provider) of any circumstances requiring a leave or extension.

**Termination of Leave of Absence**

An employee will be considered as having resigned his or her position if he or she:

1. Fails to return to work on the first day after his or her leave of absence or authorized extension expires.
2. Accepts outside employment without prior written notification to his or her supervisor (Please note that the taking or continuation of another job while on leave may lead to disciplinary action, up to and including discharge, as any employee taking personal leave under this policy is not permitted to have outside employment);
3. Gives a false reason for any requested leave of absence; or
4. Does not return to work from leave or extensions thereof within a 1-day period unless the leave is: (a) pursuant to USERRA (Uniformed Services Employment and Reemployment Rights Act); or (b) definite in duration and constitutes a reasonable accommodation for a disability covered under the Americans with Disabilities Act.

**10.21.2019**

**Parental Leave**

Advantus abides by the Family and Medical Leave Act (FMLA) as governed by the Department of Labor. Advantus will also provide up to 8 weeks of paid parental leave to eligible employees in accord with the provisions of this policy. This policy will run concurrently with FMLA leave, as applicable.

**Eligible employees must meet the following criteria:**

* Have worked at least 1,250 hours during the 12 consecutive months immediately preceding the date the leave would begin.
* Be a full-time regular employee (temporary employees and interns are not eligible for this benefit).

**In addition, employees must meet one of the following criteria:**

* Have given birth to a child.
* Be the spouse of a woman who has given birth to a child.
* Be the biological parent, or spouse of the biological parent, of the child; or
* Have adopted a child or been placed with a foster child (in either case, the child must be age 6 or younger). This provision does not apply to the adoption of a stepchild by a stepparent.

**Amount, Time Frame, and Duration of Leave:**

* Eligible employees who have given birth to a child will receive 8 weeks of paid leave for the birth of a child/children and recovery.

|  |  |
| --- | --- |
| **Years of Service** | **Eligible % of Pay** |
| **1** | **60%** |
| **3** | **80%** |
| **5 years or more** | **100%** |

* All other eligible employees will receive a maximum of 2 weeks of paid leave for the birth, adoption, or placement of a child/children.

|  |  |
| --- | --- |
| **Years of Service** | **Eligible % of Pay** |
| **1** | **60%** |
| **3** | **80%** |
| **5 years or more** | **100%** |

* Multiple births, adoptions, or placements do not increase the total amount of paid parental leave granted for that event.
* In no case will an employee receive more than the maximum paid leave in a rolling 12-month period, regardless of whether more than one birth, adoption, or foster care placement event occurs within that 12-month time frame.
* Approved paid parental leave may be taken at any time during the six-month period immediately following the birth, adoption, or placement of a child with the employee. Paid parental leave may not be used or extended beyond the six-month time frame.
* Employees must take paid parental leave in one continuous period of leave and must use all paid leave during the six-month time frame indicated above. Any unused paid leave will be forfeited at the end of the six-month time frame.
* Accrued PTO may be used during the parental leave period to supplement any shortfall in the paid weekly salary.

**Requests for Leave:**

The employee must provide their supervisor with notice of the request for parental leave under this policy at least 60 days prior to the proposed date of the leave (or if the leave was not foreseeable, as soon as possible). The employee must complete the necessary HR forms and provide all documentation as required by the HR department to substantiate the request.

**Continuation of Benefits:**

Employees who are granted parental leave may continue their health coverage under the same conditions that applied before the leave began. Benefits will continue to be paid through payroll deduction. To continue coverage, employees must pay the employee portion of the applicable premiums. Failure to pay the insurance premium may result in the loss of coverage. Benefits that are time related, such as Personal Time Off (PTO), will continue to accrue during the leave. However, paid time accrued while on leave will not be available to the employee until they return to an active work status. Time accrued while on leave will not be paid out if the employee does not return to an active status.

**Job Protection and Returning to Work:**

If an employee is on a leave of absence due to pregnancy, a physician’s statement must be completed by the attending health care provider prior to returning to work. All eligible employees will be returned to the same or equivalent position with equivalent pay, benefits and other employment terms, provided that medical documentation requirements have been met.

**11.01.2018**

**Military Leave**

It is the policy of Advantus Corp to permit employees to take military leaves of absence.

**Military Activities**

Advantus Corp will grant the employee's request for military leave of absence for up to 15 days per year to be used for military training, reserve duty, drills, maneuvers, etc. In addition, if the employee should be called to active duty, the employee may take active duty leave for up to 30 days per year. Military leave is only granted to Advantus Corp's permanent employees.

**Employment Rights**

The employee's employment rights will be preserved while the employee is on military leave. Pay increases, vacations, and other benefits that would have accrued had the employee not been on military leave of absence will be given to the employee upon returning to Advantus Corp after the military leave is over.

**Reinstatement**

Unless circumstances at Advantus Corp change so drastically while the employee is on annual or active-duty military leave that reinstatement is impossible or impractical, when the employee returns to Advantus Corp after military leave, the employee will either be reinstated to the position the employee held before taking military leave or be given a similar position with the same seniority, status, and pay, if in either case the following conditions are met:

* Proof of honorable discharge from duty
* Proof of ability to resume the position
* Notice of intention to return is given

If the employee is unable to return to the same position after annual or active-duty military leave, Advantus Corp will arrange for another position at the same seniority, status and pay.

Notice of intention to return to work must reach Advantus Corp within 7 days of the employee's discharge from military duty.

**Annual PTO Time**

Annual military leave of absence is in addition to any annual PTO the employee is entitled to. Advantus Corp will not make deductions from annual PTO time for time spent on annual military leave.

**Nondiscrimination**

Advantus Corp makes it a policy not to discriminate in any way against employees who are members of the military. The employee's job will not be in jeopardy if a military leave of absence is requested or taken.

[**Civil Air**](https://www.lawinsider.com/clause/civil-air-patrol-leave/_1)**Patrol Leave**

Any employee who is a member of Civil Air Patrol and has qualified for a Civil Air Patrol emergency service specialty or who is certified to fly counternarcotics missions shall be granted unpaid leave to perform Civil Air Patrol emergency service duty or counternarcotics missions without loss of time, regular leave or any other rights or benefits in accordance with law.

The leave is limited to 15 working days in any calendar year but is unlimited when responding to a state- or nationally declared emergency in Florida. The district may request that the employee be exempted from responding to a specific mission.

09.29.22

**Domestic Violence Leave**

Under Florida law, employers must provide employees up to 3 days of leave in a twelve-month period if the employee or a family or household member is a victim of domestic violence. The fiscal year of January 1 to December 31 will be considered the 12-month period.

**Activities Covered by the Leave**

An employer must provide leave for the following specific activities:

* Seeking an injunction for protection against domestic violence or repeat violence, dating violence, or sexual violence.
* Obtaining medical care or mental health counseling or both for the employee or a family or household member to address injuries resulting from domestic violence.
* Obtaining services from victims’ services organizations such as a domestic violence shelter or rape crisis center.
* Making the employee’s home secure from the perpetrator of domestic violence or finding a new home to escape the perpetrator.
* Seeking legal assistance to address issues arising from domestic violence or attending or preparing for court related proceedings arising from the act of domestic violence.

**Advanced Notice**

Except in cases of imminent danger to the health or safety of an employee, or to the health or safety of a family or household member, an employee seeking leave from work under this section must provide his or her employer advanced notice of the leave.

**Type of Leave**

The employee is required to use accrued paid leave. If the employee does not have sufficient leave hours to cover the event, the leave that is not covered will be unpaid.

**Employer Responsibilities**

All information relating to the leave is confidential and exempt from disclosure. This information will be documented and maintained in the Human Resources Department, separate from the employee’s official personnel file. Under no circumstances can the employer take any disciplinary action against the employee related to the use of the domestic violence leave.

**Witness Duty Leave**

An employee summoned to appear as a witness in any administrative or judicial proceeding should provide a copy of the subpoena or order to their supervisor upon receipt. Employees are required to report back to work as soon as possible after they are released from witness duty, unless there are less than two hours remaining in their scheduled workday, in which case they should report to work on their next scheduled workday.

* + 1. Proceedings Involving Advantus Corp

Required attendance at administrative or legal proceedings involving the Company, including service as a paid expert witness on behalf of the Company, is considered time worked.

* + 1. Proceedings Not Involving Advantus Corp

An exempt employee will be granted administrative leave with pay if subpoenaed to be a witness in an administrative or legal proceeding not involving the Company. Pay during witness duty will not exceed the pay for the employee’s normal workday and the employee’s normal workweek.

A non-exempt career employee will be granted administrative leave with pay for actual time spent on witness duty and in related travel if subpoenaed to be a witness in an administrative or legal proceeding not involving the Company. Absence from Work during witness duty will not exceed the pay for the employee’s normal workday and the employee’s normal workweek.

* + 1. Exceptions

An employee will not receive paid witness leave to attend a trial in which the employee:

• Is a plaintiff

• Is a defendant (unless the proceeding involves the Company).

• Voluntarily appears as a witness.

• Is testifying for a fee as an expert witness in a proceeding that does not involve the Company. In the above circumstances, an employee must use accrued PTO or take leave without pay.

**Tuition Reimbursement**

**OBJECTIVE**

The objective of the tuition reimbursement benefit is to assist employees in furthering their education while enhancing current skills to improve future career development and add value to the company.

**POLICY**

Advantus may reimburse full-time regular employees for the cost of educational courses approved by the Company. The approval for reimbursement will be dependent upon the course, its relevance to the employee's current or future potential career development, and the final grade received upon completion of the course.

Approval for reimbursement must be obtained prior to commencement of each course per semester. Failure to do so will jeopardize the reimbursement opportunity.

**PROCEDURES**

**Courses Leading to a Degree**

Undergraduate and graduate degrees will be reimbursed up to 80%, if the individual does not already have a degree and that the degree pursued is relevant to the employee’s current and/or future career development within Advantus Corp.

Advantus will not reimburse for a degree that is not relevant to the industry in which it operates. This would apply regardless of the position the individual holds within the company.

**Non-Degree Related Courses**

Reimbursement will be made up to 80% for coursework applicable to the employee’s current position. Courses applicable to potential future assignment may be approved at percentages ranging from 0% to 80% depending upon the perceived value to the Company. Accordingly, the employee’s department manager will review each application on a course-by-course basis.

Second undergraduate degrees will be reimbursed at 80% only if it is a degree in the field of study applicable to the employee’s current or a future position. Graduate degrees will be reimbursed at the rate of up to 80% provided that the degree has bona fide application to the industry in which Advantus operates. Any exception to the above requires approval of the President of Advantus.

Employees will be limited to a maximum of two courses per semester for reimbursement. Employees are encouraged to be prudent in the selection of the number of courses attempted each semester so as not to overburden themselves. Employees must be actively employed by the Company when reimbursement is sought as well as when reimbursement is paid.

Employees completing coursework will be reimbursed according to the grade achieved in the course as follows:

**A**= 80% reimbursement

**B**= 70% reimbursement

**C**= 50% reimbursement

**D** or below = no reimbursement

Reimbursement will be paid at a maximum of up to $260 per credit hour for undergraduate degree coursework and up to $520 per credit hour for graduate degree coursework. This maximum amount will be evaluated and adjusted on a regular basis as tuition costs change. The company reserves the right to limit the amount of tuition reimbursed on an annual basis.

Reimbursement is for tuition and registration costs only. All other fees such as lab fees, books, administrative fees, parking, etc. are not covered under this reimbursement plan.

It is the responsibility of the employee to inform Advantus if there are any scholarships, grants or other financial assistance awarded about the course(s) approved for reimbursement. Any assistance from another source will be considered when determining the amount of reimbursement provided by Advantus. In this case, Advantus will reimburse a percentage of the remaining balance after the other source of assistance is factored out. Failure to notify Advantus of other forms of financial assistance will cancel reimbursement for the course currently in progress as well as jeopardize any future use of this benefit.

Initial approval of a course of study does not obligate the Company to future/continued approval of courses. Approvals are only valid for the course and semester in which it is given.

Seminars, non-degree coursework and technical training will be considered on a case-by-case basis and approval will be contingent on business needs and relevance to the employee’s current position or career progression.

Advantus reserves the right to modify or adjust this plan at any time.

**ELIGIBILITY FOR PARTICIPATION**

* Full time employee *(35 or more hours per week)*.
* Employed by Advantus for a minimum of two (2) years for reimbursement of undergraduate course work.
* Employed by Advantus for a minimum of four (4) years to be eligible for graduate coursework.
* Employees must have a satisfactory performance record as evidenced by their most recent performance review and as validated by their current manager.
* Employees cannot be on any type of performance improvement plan at the time of request or at the time of reimbursement.
* Employees subject to any type of disciplinary action will not be eligible to participate in the plan.

**REPAYMENT AGREEMENT**

* Employees requesting reimbursement will be required to sign a repayment agreement prior to receiving reimbursement.
* Employees who separate from the company less than 12 months from the date of reimbursement will be required to return 100% of the amount of reimbursement to the company.
* Employees who separate from the company after 12 months, but before 24 months, from the date of reimbursement will be required to return 80% of the amount of reimbursement to the company.
* Employees who separate from the company more than 24 months, but less than 36 months, from the date of reimbursement will be required to return 60% of the amount of reimbursement to the company.
* Employees who separate from the company more than 36 months, but less than 48 months, from the date of reimbursement will be required to return 40% of the amount of reimbursement to the company.
* Employees who separate from the company more than 48 months, but less than 60 months, from the date of reimbursement will be required to return 20% of the amount of reimbursement to the company.

**STEPS FOR REQUESTING REIMBURSEMENT**

1. All courses must be approved in advance and prior to the actual commencement of the course. Employee fills out a Request for Educational Reimbursement form and turns it in to their department manager at least 2 weeks prior to the start of the class. The submission must include an objective statement, explaining why the employee is seeking the degree, and what benefit it will be to the individual and the company. Attach copies of the registration form reflecting the cost of the course/program.
2. Department manager reviews the request, discusses the request with the employee and indicates recommendation or denial of request.
3. Department manager forwards request to EC member for approval.
4. Approved request is forwarded to Human Resources department.
5. Upon completion of the course, employee will submit a valid grade report showing the final grade received for the course to their department manager, as well as a detailed account statement for the semester in which seeking reimbursement. The statement must include the course list, fees and any financial assistance received.
6. Manager will forward documentation to the Human Resources Department for reimbursement approval.
7. Human Resources will forward all supporting documentation to the Accounting Department for check disbursement.
8. Accounting department issues reimbursement to the employee.

08.29.19

**Time Off & Attendance**

**Paid Time Off**

Paid Time Off (PTO) begins accruing each bi-weekly pay period starting on your hire date. You are eligible to participate in the PTO program if you are a full-time regular employee and have completed the 90-day introductory period.

**Non-Exempt (Hourly) Employees**

1 to 3 years 104 hours (approximately 13 days).

Maximum carry over = 40 hours

After 3 years 120 hours (approximately 15 days).

Maximum carry over = 40 hours

**Exempt (Salary) Employees**

1 to 3 120 hours (approximately 15 days).

Maximum carry over = 40 hours

After 3 years 160 hours (approximately 20 days).

Maximum carry over = 40 hours

**Employees must schedule time off in advance with their supervisors.** We will try to grant every employee's PTO request for the days off they choose. However, we must have enough employees to meet our day-to-day need — which means we may not be able to grant every PTO request, especially during holiday periods.

If circumstances, such as a medical or family emergency, prevent advance scheduling, you must inform your supervisor as soon as possible that you wish to take paid time off. You may be expected to provide documentation for such time off.

Because PTO encompasses vacation and sick leave, employees must manage their PTO responsibly to ensure that they have time available for emergencies, such as personal or family illness. An employee who needs time off but has no accrued PTO may be eligible to take unpaid leave. The Company will decide these requests on a case-by-case basis.

**Attendance**

The purpose of this policy is to set forth Advantus Corp's policy and procedures for handling employee absences and tardiness to promote the efficient operation of the company and minimize unscheduled absences.

Punctual and regular attendance is an essential responsibility of each employee at Advantus Corp. Employees are expected to report to work as scheduled, on time and prepared to start working. Employees also are expected to remain at work for their entire work schedule. Late arrival, early departure or other absences from scheduled hours are disruptive and must be avoided.

This policy does not apply to absences covered by the Family and Medical Leave Act (FMLA) or leave provided as a reasonable accommodation under the Americans with Disabilities Act (ADA). These exceptions are described in separate policies.

*Absence*  
"Absence" is defined as the failure of an employee to report for work when he or she is scheduled to work. The two types of absences are defined below:

*Excused absence* occurs when all the following conditions are met:

* The employee provides to his or her supervisor sufficient notice at least 48 hours in advance of the absence.
* The absence request is approved in advance by the employee's supervisor.
* The employee has sufficient accrued paid time off (PTO) to cover the absence.

*Unexcused absence* occurs when any of the above conditions are not met. If it is necessary for an employee to be absent or late for work because of an illness or an emergency, the employee must notify his or her supervisor no later than one hour before the employee's scheduled starting time on that same day. If the employee is unable to call, he or she must have someone make the call.

An unexcused absence counts as one occurrence for the purposes of discipline under this policy.

Employees with three or more consecutive days of excused absences *because of illness or injury* must give Advantus Corp proof of physician's care and a fitness for duty release prior to returning to work.

Employees must take earned PTO for every absence unless otherwise allowed by company policy (e.g., leave of absence, bereavement, jury duty).

*Tardiness and Early Departures*

Employees are expected to report to work and return from scheduled breaks on time. If employees cannot report to work as scheduled, they must notify their supervisor no later than their regular starting time. This notification does not excuse the tardiness but simply notifies the supervisor that a schedule change may be necessary.

Employees who must leave work before the end of their scheduled shift must notify a supervisor immediately.

Tardiness and early departures are each one-half an occurrence for the purpose of discipline under this policy.

*Disciplinary Action*

Excessive absenteeism is defined as two or more occurrences of unexcused absence in a 90-day period and will result in disciplinary action. 5 occurrences of unexcused absence in a 6-month period are considered grounds for termination.

* 1st occurrence – No disciplinary action
* 2nd occurrence – Verbal Warning
* 3rd occurrence – Written Warning
* 4th occurrence – Final Written Warning
* 5th occurrence – Termination of employment

*Job Abandonment*

Any employee who fails to report to work for a period of two days or more without notifying his or her supervisor will be considered to have abandoned the job and voluntarily terminated the employment relationship.  Employees will be subject to immediate corrective action for pattern unscheduled absences and no call/no show.

**WH Management PTO Policy**

While we try to grant every employee’s PTO requests for the days off they choose, we need to have enough management employees on site to meet our day-to-day need – which means we may not be able to grant every PTO request, especially during holiday periods. Two operational managers are required to always present during operations at 12th Street, and one exempt member of management at Shawland and Gun Club Road during operations.

Managers and supervisors will be asked to schedule their PTO for the year no later than March 31. This does not include singular days off used throughout the year.

**Guidelines:**

1. A request sheet will be distributed each January that will include the time available for the year. Managers and Supervisors will be asked to request and rank their top 3 choices for time off.
   1. In the event there are multiple requests for the same time, and not all can be approved, PTO time will be awarded based on seniority and rank of choice.
2. Managers are responsible for the coordination and scheduling of all PTO in the departments:
   1. Management approval of individual PTO requests will take into consideration requirements of the combined workload in the departments as well as the appropriate running of the facility.
   2. Managers should consider the individual responsibilities and continuity of workflow when approving PTO time.
3. Managers cannot take PTO unless prior management approval has been obtained.
   1. An exception is the use of PTO for unplanned days off – illness, personal emergencies, etc.
   2. All PTO requests for approval must be submitted through ADP.

**Work from Home & Flex Schedule**

**Policy Purpose**

Advantus Corp’s Work from Home & Flex Schedule Policy outlines the guidelines for employees who periodically work from a location other than our offices. We are committed to help employees face the demands of juggling work, family, and personal obligations by offering flexible work arrangements. These arrangements provide employees with increased flexibility with their work schedule while allowing Advantus Corp to maintain a progressive and productive work environment.

**Work from Home Eligibility**

* New employees are eligible to work from home one day per week after the initial training period. This will vary and be determined on a case-by-case basis.
* All permanent, full-time employees with up to one year of service are eligible to apply to work from home one day per week.
* All permanent, full-time employees with more than one year of service are eligible to apply to work from home up to two days per week.
* All permanent, full-time employees with more than three years of service are eligible to apply to work from home up to three days per week.
* Work from home is subject to position eligibility and is at the discretion of your manager.
* Employee productivity is subject to verification.
* Must have a 3.0 or higher performance score on the most recent performance review.
* Cannot have current verbal or written disciplinary action on file.

**Requests to Work from Home**

After the initial training period, Advantus Corp will consider requests to work from home one day per week. Between 1 year and 3 years of service, Advantus Corp will consider requests to work from home up to two days per week. After 3 years of service, Advantus Corp will consider requests to work from home up to three days per week. A request to work from home should be submitted through the ADP payroll portal.

Upon receipt of your request, Advantus Corp may contact you for additional information/ask you to explain why your job responsibilities are suitable for work from home.

All work from home arrangements must be scheduled and approved in advance by the department head but may be revoked at any time based on business needs.

Working from home may by revoked in the absolute discretion of the department head or Company for any reason including the failure to meet productivity standards, slowing department workflow, or violations of the work from home policy or any company policy.

Advantus Corp may approve a request to work from home for a trial period. During the trial period, the work from home arrangement will be reviewed by Advantus Corp and may be withdrawn or approved for a longer period.

Advantus Corp or your manager may require employees who work from home to report to work as needed. Requested work from home days must not interfere with the work of the department or the company. The needs of the department and the company take precedence over a remote workday. Department managers are responsible for the coordination of the department’s work from home days to ensure maximum productivity within the department.

Employee is responsible for having an adequate work from home setup. Employees who are scheduled to attend Zoom must use video conferencing to attend. Employees will be required to log in using 2 Factor Authentication (2FA) and install/use the Microsoft Authenticator app on their phone for logging in.

Working from home is not designed to be a replacement for childcare. Employees may not provide primary care for children under 12 years of age when they are working at home. Employees with children under age 12 may work at home only if someone else will provide primary care for the child during work hours.

**Flexible Work Schedule**

Advantus Corp office employees will be considered for alternative work scheduling on a case-by-case basis. Employees will work eight hours per workday (Monday – Friday) with flexible start and end times. Employees who are approved for flextime can begin their shift between 7 AM EST and 10 AM EST and end their shift between 3:30 PM EST and 6:30 PM EST. Employees are not permitted to forgo the required 30-minute lunch break to shorten the duration of the workday.

Flexible work arrangements are not appropriate for all employees or positions and are not a universal employee benefit. Factors that will be considered when determining flexible work arrangements:

* The nature of the employee’s job.
* The needs of the employee’s team or department.
* The impact on colleagues.
* The impact on customers.

**Eligibility**

* All permanent, full-time employees who work in an office role are eligible to apply for a flexible work schedule.
* Employee must have a satisfactory attendance record.
* Employee must have a 3.0 or higher score on the most recent performance review.
* Employee must consistently demonstrate the ability to complete tasks and assignments on a timely basis.
* Employee cannot have current verbal or written disciplinary action on file.

**Procedure**

1. Employee submits a written request to his or her department head that includes the desired work schedule.
2. Department head approves or denies the request. If denied, the department head will explain why.
3. Employee and manager meet to discuss the details of the arrangement and set specific goals and responsibilities.
4. HR is notified of the new schedule and adjusts employee’s assigned schedule in the company’s payroll system.

Upon approval of a flexible work schedule, a trial period will apply to assess the impact and effectiveness of the arrangement. After successful completion of the trial period, the work arrangement will be reviewed at least annually thereafter to ensure continued success.

Once the schedule is determined and approved, employees cannot make changes for at least 90 days, and any substantial changes must be approved by the department head. One-off exceptions will be allowed for things like doctor’s appointments or other commitments.

Flexible work arrangements may be adjusted or cancelled at any time by the department head. When cancelled, the employee will be provided an adequate amount of time to adjust personal obligations that are impacted by the cancellation. An employee wishing to change an alternative work arrangement must obtain written approval from his or her department head.

**Policies Remain in Effect**

Employees permitted to work from home and who have flexible schedules must continue to abide by Advantus Corp’s company policies. Failure to follow Advantus Corp policies may result in discipline, including but not limited to termination of the work from home or flexible schedule arrangement or termination of employment.

**Time Keeping**

Nonexempt employees who are permitted to work from home or have a flexible schedule must comply with Advantus Corp’s timekeeping policy by clocking in and out.

**Expenses**

Advantus Corp will not be responsible for any of the following costs related to working from home:

* Phone/Cell phone charges
* Internet access
* Electric bills
* Office space, supplies, and equipment

**Worker’s Compensation**

Worker’s compensation does not apply to injuries to any third parties or members of the employee’s family on the employee’s premises. In the event of a job-related injury, you should report the incident to your supervisor as soon as possible.

08.24.22

**Offsite Equipment**

Recognizing that flexibility in work location can have a positive impact on employees, Advantus offers both hybrid and remote work opportunities for many of our administrative support roles.

Hybrid Workers are defined as employees who are in the office at least two days per week. Remote Workers are defined as employees who are not in the office or are in the office on an occasional basis.

All employees of Advantus Corp need the right tools and technology to fulfill their duties, collaborate with coworkers, communicate with managers, and feel part of the team.

**Remote Workers**

Advantus Corp will provide the following equipment to remote workers:

* Computer
  + Advantus platforms
  + Microsoft Office
  + Other standard software packages
* Keyboard and mouse
* Cables
* Dual monitors
* Webcam
* Headset (for phone and/or computer)
* Printer (if required for role)

The equipment Advantus provides is company property. Employees must keep it safe and avoid any misuse. Specifically, employees must:

* Keep their equipment password protected.
* Store equipment in a safe and clean space when not in use.
* Follow all data encryption, protection standards and settings.
* Refrain from downloading suspicious, unauthorized, or illegal software.
* Return equipment upon change in employment status (for example, termination, resignation, or change to in-office or Hybrid)

**Hybrid Workers**

Employees who work a hybrid schedule are responsible for ensuring that their offsite work location is equipped with the equipment they need to fully carry out their assigned duties. This includes a computer, external display, mouse, keyboard, and any other required equipment.

Advantus Corp is not responsible for servicing and maintaining equipment that is not Advantus’ property and shall not be responsible for costs associated with normal wear, maintenance, upkeep, repair, or replacement of personal equipment that supports the employee’s ability to work a hybrid arrangement.

Whether remote or hybrid, Advantus Corp is not responsible for costs associated with the following:

* Home internet connection (whether ongoing service, upgraded service, or new service)
* Upgraded cell phone, costs of cell phone
* Increased utility expenses

09.20.22

**Holidays**

Advantus will grant holiday time off to all employees on the holidays listed below:

\* New Year's Day (January 1)

\* Memorial Day (last Monday in May)

\* Independence Day (July 4)

\* Labor Day (first Monday in September)

\* Thanksgiving (fourth Thursday in November)

\* Day after Thanksgiving

\* Christmas (December 25)

The 8th paid holiday each year will be determined by that year’s calendar.

Advantus will grant paid holiday time off to all regular, full-time employees immediately upon hire. Holiday pay will be calculated based on the employee's straight time pay rate (as of the date of the holiday) times the number of hours the employee would otherwise have worked on that day.

To be eligible for holiday pay, employees must work the last scheduled day immediately preceding and the first scheduled day immediately following the holiday.

A recognized holiday that falls on a Saturday will be observed on the preceding Friday. A recognized holiday that falls on a Sunday will be observed on the following Monday.

If a recognized holiday falls during an eligible employee's paid absence (such as vacation or sick leave), holiday pay will be provided instead of the paid time off benefit that would otherwise have applied.

If eligible nonexempt employees work on a recognized holiday, they will receive holiday pay plus wages at their straight-time rate for the hours worked on the holiday.

Paid time off for holidays will not be counted as hours worked for the purposes of determining overtime.

**Timekeeping**

Accurately recording time worked is the responsibility of every nonexempt employee. Federal and state laws require Advantus to keep an accurate record of time worked in order to calculate employee pay and benefits. Time worked is the time actually spent on the job performing assigned duties.

Altering, falsifying, tampering with time records, or recording time on another employee's time record may result in disciplinary action, up to and including termination of employment.

Advantus hourly employees are responsible for clocking in and out in order to document time worked. Non-exempt (hourly) employees must clock in and/or out at their designated time clock. Exempt (salary) employees do not need to use a time clock. Managers are responsible for ensuring that employees are using the time clock(s) properly. Failure to comply with this process may produce errors in payroll and payment for time worked. Continuous failure to clock in and/or out by an hourly employee may result in disciplinary action up to and including termination.

Any employee who fails to clock in and/or out must notify their Manager or Supervisor immediately to indicate the correct time of the punch and to allow the Manager to correct in the time keeping system.

**Rest and Meal Periods**

Each workday, full-time nonexempt warehouse employees are provided with a 15-minute rest period. Office employees may elect to take a 15-minute rest break each workday if they choose. Supervisors will advise employees of the rest period length and schedule. To the extent possible, rest periods will be provided in the middle of work periods. Since this time is counted and paid as time worked, employees must not be absent from their workstations beyond the allotted rest period time.

All full-time nonexempt employees are provided with one meal period of 30 minutes in length each workday. Supervisors will schedule meal periods to accommodate operating requirements. Employees will be relieved of all active responsibilities and restrictions during meal periods and will not be compensated for that time.

Employees must punch out at their designated time when leaving for a scheduled break, and punch back in at its conclusion, in order to keep an accurate record of hours worked. Failure to accurately record time worked can lead to disciplinary action up to and including termination of employment.

**Overtime**

When operating requirements cannot be met during regular working hours, employees may be scheduled to work overtime hours. When possible, advance notification of these mandatory assignments will be provided. All overtime work must receive the supervisor's prior authorization. Overtime assignments will be distributed as equitably as practical to all employees qualified to perform the required work.

Overtime compensation is paid to all nonexempt employees in accordance with federal and state wage and hour restrictions. Overtime pay is based on actual hours worked. Time off on sick leave, vacation leave, or any leave of absence will not be considered hours worked for purposes of performing overtime calculations.

Failure to work scheduled overtime or overtime worked without prior authorization from the supervisor may result in disciplinary action, up to and including possible termination of employment.

**Pay Deductions and Garnishments**

The law requires that Advantus make certain deductions from every employee's compensation. Among these are applicable federal, state, and local income taxes. Advantus also must deduct Social Security taxes on each employee's earnings up to a specified limit that is called the Social Security "wage base." Advantus matches the amount of Social Security taxes paid by each employee.

Advantus offers programs and benefits beyond those required by law. Eligible employees may voluntarily authorize deductions from their paychecks to cover the costs of participation in these programs.

Pay garnishments are pay deductions taken by Advantus, usually to help pay off a debt or obligation to Advantus or others.

If you have questions concerning why deductions were made from your paycheck or how they were calculated, your supervisor can assist in having your questions answered.

**Advantus IT Policy** (Updated 5/3/24)

Advantus Corp (or “Company”) makes available to our workforce access to one or more forms of electronic media and services, including computers, e-mail, telephones, voicemail, external electronic bulletin boards, wire services, online services, intranet and the Internet.

**Scope**

This policy applies throughout the organization as part of the corporate governance framework. It applies regardless of whether staff use computer systems and networks, since all staff are expected to protect all forms of information assets including computer data, written materials/paperwork, and intangible forms of knowledge and experience. This policy also applies to third party employees working for the organization whether they are explicitly bound (e.g. by contractual terms and conditions) or implicitly bound (e.g. by generally held standards of ethics and acceptable behavior) to comply with our information security policies.

**Business Use**

The computers, electronic media and services provided by Advantus Corp are primarily for business use to assist employees in the performance of their jobs. Limited, occasional or incidental use of electronic media (sending or receiving) for personal, non-business purposes is understandable and acceptable, and all such use should be done in a manner that does not negatively affect the systems’ use for business purposes.

**Ownership**

All information and messages that are created, sent, received, or stored on the Company’s e-mail system, messaging platforms, and servers is the sole property of Advantus.

**Right to Review**

Advantus reserves the right, at its discretion, to review any employee’s electronic files and messages to the extent necessary to ensure electronic media and services are being used in compliance with the law, this policy, and other Company policies. All e-mail and instant messages are subject to the right of the Company to monitor, access, read, disclose, and use such e-mail without prior notice to the originators and recipients of such e-mail. E-mail may be monitored and read by authorized personnel for the Company for any violations of law, breaches of Company policies, communications harmful to the Company, or for any other reason.

**Prohibited Content**

The Company’s anti-harassment and discrimination policies also apply to the use of the Company’s resources. This means that an investigation will be conducted, and discipline imposed where necessary.

Electronic media cannot be used for knowingly transmitting, retrieving, or storing communication that is:

* Discriminatory or harassing.
* Derogatory to any individual or group.
* Obscene, sexually explicit or pornographic.
* Defamatory or threatening.
* In violation of any license governing the use of software; or
* Engaged in any purpose that is illegal or contrary to the Company’s policy/business interests.

**No Presumption of Privacy**

All communications should not be assumed to be private, and security cannot be guaranteed. Employees should have no expectation of privacy or security with respect to incoming and outgoing messages and all other documents stored on their computer. Highly confidential or sensitive information should not be sent via e-mail. Advantus reserves and intends to exercise the right to review, audit, intercept, access and disclose all messages and documents created, received, or sent over the electronic system for any purpose. The contents of electronic mail, properly obtained for legitimate business purposes, may be disclosed within the Company without the permission of the employee.

Notwithstanding the Company’s right to retrieve and read messages and documents, such information should be treated as confidential by other employees and accessed only by the intended recipient. Employees are not authorized to retrieve or read any e-mail messages that are not sent to them. Any exception to this policy must receive prior approval by the Company.

**Certain Prohibited Activities**

Employees may not, without the Company’s express written authorization, transmit trade secrets or other confidential, private, or proprietary information or materials through electronic media. Employees also shall not send (upload) or receive (download) copyrighted materials through the electronic media system.

Anyone obtaining electronic access to other companies’ or individuals’ materials must respect all copyrights and cannot copy, retrieve, modify, or forward copyrighted materials except as permitted by the copyright owner.

**Password Security**

Passwords should not be stored in SharePoint, OneDrive, or the Wiki. Passwords must not be written down and stored anywhere in any office. Passwords must not be stored in a file on a computer system or mobile device (phone, tablet) without encryption. Discovery of passwords being stored in plaintext will result in disciplinary action, up to and including termination of employment.

**Social Media Use**

Social media accounts are intended to be used solely for business purposes. Depending on the nature of the employee’s duties, these purposes may be addressed through a variety of services, including but not limited to Facebook, X (Twitter), LinkedIn, and YouTube. Legitimate business use includes:

* Building positive brand image.
* Increasing mind share.
* Improving customer satisfaction
* Gaining customer insights
* Increasing customer retention
* Increasing revenue
* Reducing cost of servicing customers

**Message Retention and Creation**

Employees should be careful in creating e-mail. Even when a message has been deleted, it may still exist in printed version, be recreated from a back-up system, or may have been forwarded to someone else. Please note that appropriate electronic messages may need to be saved. Also, if so ordered, the Company may be required to produce e-mail in litigation.

**Email Signature and Background**

Uniform default signatures for all employees have been created to maintain Advantus Corp’s high business standards. Adding personal signatures and email backgrounds are strictly prohibited.

**Computer/Electronic Media Move**

Most computers and electronic media are connected to the network and are centrally managed by the IT department.

**Viruses**

Any viruses, tampering or system problems should be immediately reported to IT Support.

**Consequences of Violations**

Any employee who abuses the privilege of their access to computers, electronic media, and intranet in violation of this policy will be subject to corrective action, including possible termination of employment, legal action, and criminal liability.

**Security**

Except in cases in which explicit authorization has been granted by the Advantus Executive Committee, employees are prohibited from engaging in, or attempting to engage in:

* Monitoring or intercepting the files or electronic communications of other employees or third parties.
* Hacking or obtaining access to systems or accounts they are not authorized to use.
* Using other people’s logins or passwords; and
* Breaching, testing, or monitoring computer network security measures.

No e-mail or other electronic communications can be sent that attempt to hide the identity of the sender or represent the sender as someone else.

Electronic media and services should not be used in a manner that is likely to cause network congestion or significantly hamper the ability of people to access and use the system.

The e-mail system is only to be used by authorized persons, and an employee must have been issued an e-mail password to use the system. Employees shall not disclose their codes or passwords to others and may not use someone else’s code or password without express written authorization from the Company.

**Mandatory IT Training**The Advantus IT department requires that each employee upon hire and at least annually thereafter successfully complete mandatory training. Certain staff may be required to complete additional training modules depending on their specific job requirements upon hire and at least annually.

**Simulated Social Engineering Exercises (Phishing Tests, etc.)**The Company will conduct periodic simulated social engineering exercises, like email phishing tests. The Company will conduct these tests at random throughout the year with no set schedule or frequency and may also conduct targeted exercises against specific departments or individuals based on a risk determination.

**Remedial Training Exercises**

From time to time, staff may be required to complete remedial training courses or may be required to participate in remedial training exercises with members of the IT department as part of a risk-based assessment.

**Compliance & Non-Compliance with Policy**Compliance with this policy is mandatory for all staff, including contractors and executives. The Company will monitor compliance and non-compliance with this policy and report to the executive team the results of training and social engineering exercises.

**Non-Compliance Actions**Certain actions or non-actions by personnel may result in a non-compliance event (Failure).

A non-live/exercise Failure includes but is not limited to:

* Failure to complete required training within the time allotted
* Failure of a social engineering exercise
* Failure to report the exercise to the IT department

Failure of a social engineering exercise (i.e. a phishing test) includes but is not limited to:

* Clicking on a URL within a phishing test
* Replying with any information to a phishing test
* Scanning a QR code within an exercise
* Opening an attachment that is part of a phishing test
* Entering any data within a landing page as part of a phishing test
* Plugging in a USB stick or removable drive as part of a social engineering exercise
* Failure to report the exercise to the IT department

A live/non-exercise Failure includes but is not limited to:

* Clicking on a live (non-test) phishing link and/or entering data in a phish event
* Opening an attachment that is part of a live (non-exercise) phish event
* Entering any data within a landing page as part of a phishing event

**Compliance Actions**Certain actions or non-actions by personnel may result in a compliance event (Pass). At the discretion of the Company, a Pass may remove a previous Failure from counting towards the employee’s Failure count. See Schedule of Failure Penalties.

A Pass includes but is not limited to:

* Successfully identifying a simulated social engineering exercises
* Not having a Failure during a social engineering exercise (not clicking, not taking action)
* Reporting real social engineering attacks to the IT department
* Completing additional training required by the IT department
* One year since the last training/social engineering exercise

**Responsibilities**All Managers are responsible for ensuring that their staff and other workers within their responsibility participate in the information security awareness, training, and educational activities where appropriate and required.

All Staff are personally accountable for completing the security awareness training activities, and complying with applicable policies, laws, and regulations at all times.

**Schedule of Failure Penalties**The following table outlines the penalty of non-compliance with this policy. Steps not listed here may be taken by Advantus to reduce the risk that an individual may pose to the Company.

|  |  |
| --- | --- |
| **Testing/Social Engineering (Exercise) Failures** | |
| **Failure Count** | **Resulting Level of Remediation Action** |
| First Failure | Mandatory completion of remedial training. |
| Second Failure | Mandatory completion of remedial training. |
| Third Failure | Face to face meeting with their manager |
| Fourth Failure | Face to face meeting with their manager and HR  Possibility that additional administrative and technical controls will be implemented to prevent further Failure events |
| Fifth Failure | Formal review of employment with Head of Human Resources |
| Sixth and Subsequent Failures | Potential for Termination of Employment or Employment Contract |
| **Live (Non-Exercise) Failures** | |
| **Failure Count** | **Resulting Level of Remediation Action** |
| First Failure | Mandatory completion of remedial training, face to face meeting with their manager  Possibility that additional administrative and technical controls will be implemented to prevent further Failure events |
| Second and Subsequent Failures | Formal warning, face to face meeting with their manager and HR  Potential for Termination of Employment or Employment Contract |

**Artificial Intelligence Tool Use Policy**

**Scope**

The use of AI tools presents challenges in terms of information security and data protection. This policy is a guide for employees on how to be safe and secure when using AI tools, especially when it involves the sharing of potentially sensitive company and customer information.

**Purpose**

The purpose of this policy is to ensure that all employees use AI tools in a secure, responsible, and confidential manner. The policy outlines the requirements that employees must follow when using AI tools, including the evaluation of security risks and the protection of confidential data.

**Policy statement**

Our organization recognizes that the use of AI tools can pose risks to our operations and customers. We are committed to protecting the confidentiality, integrity, and availability of all company and customer data. This policy requires all employees to use AI tools in a manner consistent with our security best practices.

**Security best practices**

All employees are expected to adhere to the following security best practices when using AI tools:

• **Evaluation of AI tools:** Employees must evaluate the security of any AI tool before using it. This includes reviewing the tool’s security features, terms of service, and privacy policy. Employees must also check the reputation of the tool developer and any third-party services used by the tool.

• **Protection of confidential data:** Employees must not upload or share any data that is confidential, proprietary, or protected by regulation without prior approval from the appropriate department manager. This includes data related to customers, employees, or partners as well as Advantus-developed code and written materials.

• **Access control:** Employees must not share login credentials or other sensitive information with third parties.

• **Use of reputable AI tools:** Employees should use only AI tools approved by the Director of IT and be cautious when using tools developed by individuals or companies without established reputations. Any AI tool used by employees must meet our security and data protection standards and be approved by the Director of IT

• **Compliance with security policies:** Employees must apply the same security best practices we use for all company and customer data. This includes using strong passwords, keeping software up-to-date, and following our data retention and disposal policies.

• **Data privacy:** Employees must exercise discretion when sharing information publicly. As a first step, employees must ask themselves the question, “Would I be comfortable sharing this information outside of the company? Would we be okay with this information being leaked publicly?” before uploading or sharing any data into AI tools.

**Review and revision**

This policy will be reviewed and updated on a regular basis to ensure that it remains current and effective. Any revisions to the policy will be communicated to all employees.

**Conclusion**

Advantus is committed to ensuring that the use of AI tools is safe and secure for all employees and customers, as well as the organization itself. We believe that by following the guidelines outlined in this policy, we can maximize the benefits of AI tools while minimizing the potential risks associated with their use.

**Social Media**

This policy has been developed in recognition of the popularity of and participation in online social media and will provide guidance for the appropriate use of social media.

For the purposes of this policy, social media refers broadly to any online media which allows for user participation, interaction or publishing. Commonly used social media tools include but are not limited to Facebook, Instagram, Pinterest, YouTube, Twitter, blogs, forums, discussion boards and wikis.

This policy applies to all team members and contractors of Advantus Corp.

Social media use shouldn’t interfere with the employee’s responsibility at Advantus Corp. Advantus Corp.’s computer systems are to be used for business purposes only. When using Advantus Corp.’s computer systems, use of social media for business purposes is allowed, but personal use of social media networks or personal blogging of online content is discouraged and could result in disciplinary action.

The following principles apply to professional use of social media on behalf of Advantus Corp. as well as personal use of social media when referencing Advantus Corp.

* Do not disclose Advantus Corp.’s confidential, proprietary or sensitive information, as outlined in the Company’s Confidentiality Policy.
* Do not use the Advantus Corp. logo or company branding on any social media platform without prior approval from a Director-level or above employee of the Company.
* Do not communicate anything that may damage Advantus Corp.’s brand, reputation or commercial interests.
* Do not represent or communicate on behalf of Advantus Corp. in the public domain without prior approval from a Director-level or above employee of the company.
* Do not post any material that would directly or indirectly defame, harass, discriminate against or bully any Advantus Corp. employee, customer or vendor.
* Do not upload, post, or forward a link to any abusive, obscene, discriminatory, harassing, derogatory or defamatory content.
* Social media networks, blogs and other types of online content can generate press and media attention or legal questions. Employees should refer press and media inquiries to the VP of Sales & Marketing Administration and refer legal inquiries to General Counsel.
* Employees should keep Advantus Corp. related social media accounts separate from personal accounts when at all possible.

Use of social media websites (whether accessed for work purposes) may be monitored and is subject to disciplinary action where breaches of this policy are found. We reserve the right to restrict or prevent access to certain social media websites during working hours if we consider personal use to be excessive. Monitoring is only carried out to the extent permitted or as required by law and as necessary and justifiable for business purposes.

**Cell Phone Use**

**Office**

Advantus provides cellular telephones to some employees as a business tool. They are provided to assist employees in communicating with management and other employees, their clients, associates, and others with whom they may conduct business. Cell phone use is intended for business-related calls only and personal calls are not permitted. Cell phone invoices may be regularly monitored.

Although we are aware that employees also often utilize their personal cellular phones for business purposes, they can become a distraction in the workplace, particularly in meetings.  In order to ensure the effectiveness of meetings, employees are asked to leave cell phones at their desks.  Or, when an emergency or anticipated emergency requires immediate attention, cell phones should be put on silent or vibrate.

If you must receive or respond to a call or an email, please excuse yourself from the meeting.  In the event of longer meetings, build a break into the agenda for everyone to address issues that may have arisen.

As a representative of Advantus, cell phone users are reminded that the regular business etiquette employed when speaking from office phones or in meetings applies to conversations conducted over a cell phone.

Personal use of cell phones for talking is limited to breaks and lunches. In the event a call must be taken during normal business hours, employees are to excuse themselves from the floor to receive. Cell phones are permitted for use to play music, however, are not to be used for texting or surfing the web.

**Warehouse**

Employees using technology (cell phones, smartwatches, tablets, etc.) for calls, texting, or internet use during production hours will be subject to disciplinary action. These devices are to be used on approved breaks or at lunchtime. You may use these devices in the designated areas only. Those areas are defined as outside the facility or inside the breakroom. No employee will be able to listen to music (or other forms of media) via their phone, speaker, radio, headphones, or earbuds. Any violation will be met with swift action detailed below:

|  |  |
| --- | --- |
| 1st Occurrence | Written Warning |
| 2nd Occurrence | Termination |

If there is an emergency and you must be reached, the caller should contact us at **(904) 482-0091**. The caller will need to provide your name and your supervisor’s name. The person who answers the phone will contact your supervisor or another manager who can contact you via radio or other means.

It is important to note that any person in a supervisor or above role has the authority to enforce this policy. It does not have to be your direct manager.

**Cell Phone Allowance**

Advantus Corp does not provide its employees with company-owned cell phones for their use. Employees whose job duties require them to regularly use or be available by personal cell phone shall receive a cell phone allowance to compensate for the business use of their personal device.

1. **Determination of Allowance**

A cell phone allowance is available either on an ongoing or short-term basis. Receipt of a cell phone allowance shall be based upon job duties. Individuals whose duties routinely or temporarily include the following may be eligible for a regular or temporary (minimum of two pay periods) allowance:

* Critical and/or emergency decision making
* Safety or security
* Considerable time away from an assigned office or work area, without assigned telephone access
* Required to be accessible outside of scheduled or normal working hours on a routine basis

The employee’s department head must confirm, in writing, that an employee meets at least one of these criteria and recommend that the employee receive a cell phone allowance to compensate for business use of a personal cell phone.

* A request for a cell phone allowance may be made at any time during the fiscal year.
* Allowances are not available retroactively.
* All approved allowances will be processed on the first available payroll.
* A cell phone allowance does not constitute an increase to base pay and will not be included in the calculation of percentage increases to base pay for purposes of calculating pay raises.

1. **Employee Agreement**

To receive a cell phone allowance, the employee agrees to the following:

* Obtain and maintain a personal cell phone and sufficient service to enable accomplishment of necessary job duties.
* They are responsible for any loss, damage, insurance, and/or replacement of their personal cell phone.
* Carry the cell phone and keep it charged and in operational condition as necessary to perform their job duties.
* Share their cell phone number and that their cell phone number may be shared as necessary for business purposes. Report to their department head any change to their cell phone number
* Install applications as requested by the company, including but not limited to a two-factor authenticator application and zoom or related business communication application.

1. **Amount of Allowance**

The dollar amount of the cell phone allowance is $35.00 per bi-weekly pay period.

1. **Use of Phone**

Use of the phone in any manner contrary to local, state, or federal laws will constitute misuse, and will result in immediate termination of the cell phone allowance.

1. **Review**

The Director, Shared Services is responsible for annual review of the list of employees receiving the cell phone allowance, to determine if existing allowances should be continued as is, changed, or discontinued, and to determine if any new allowances should be established.

1. **Costs**

Advantus Corp shall not bear any costs associated with an employee’s maintenance of a personal cell phone and related service, other than an allowance approved pursuant to this policy.

1. **Department Responsibility**

It is the manager’s responsibility to notify HR, in writing, to terminate a cell phone allowance if the employee no longer qualifies.

09.29.22

**Visitors in the Workplace**

To provide for the safety and security of employees and the facilities at Advantus, only authorized visitors are allowed in the workplace. Restricting unauthorized visitors helps maintain safety standards, protects against theft, ensures security of equipment, protects confidential information, safeguards employee welfare, and avoids potential distractions and disturbances.

All visitors should enter Advantus at the reception area and check in with the Receptionist. Visitors will receive a guest badge upon entry. Authorized visitors will receive directions or be escorted to their destination. Employees are responsible for the conduct and safety of their visitors.

If an unauthorized individual is observed on Advantus' premises, employees should immediately notify their supervisor or, if necessary, direct the individual to the reception area.

**Safety**

To assist in providing a safe and healthful work environment for employees, customers, and visitors, Advantus has established a workplace safety program. This program is a top priority for Advantus. Its success depends on the alertness and personal commitment of all.

Advantus provides information to employees about workplace safety and health issues through regular internal communication channels such as supervisor-employee meetings, bulletin board postings, memos, or other written communications.

Employees and supervisors receive periodic workplace safety training. The training covers potential safety and health hazards and safe work practices and procedures to eliminate or minimize hazards. A safety committee has been established to assist in these activities and to facilitate effective communication between employees and management about workplace safety and health issues.

Each employee is expected to obey safety rules and to exercise caution in all work activities. Employees must immediately report any unsafe condition to the appropriate supervisor. 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 the appropriate supervisor. Such reports are necessary to comply with laws and initiate insurance and workers' compensation benefits procedures.

**Workplace Violence Prevention**

Advantus is committed to preventing workplace violence and to maintaining a safe work environment. Given the increasing violence in society in general, Advantus 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 supervisors and temporary employees, should be always treated with courtesy and respect. 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 on the premises of Advantus without proper authorization.

Conduct that threatens, intimidates, or coerces another employee, a customer, 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, age, or any characteristic protected by federal, state, or local law.

All threats of (or actual) violence, both direct and indirect, should be reported as soon as possible to your immediate supervisor or any other member of management. This includes threats by employees, as well as threats by customers, vendors, solicitors, or other members of the public. When reporting a threat of violence, you should be as specific and detailed as possible.

All suspicious individuals or activities should also be reported as soon as possible to a supervisor. 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.

Advantus 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, Advantus may suspend employees, either with or without pay, pending investigation.

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.

Advantus encourages employees to bring their disputes or differences with other employees to the attention of their supervisors or the Human Resources Department before the situation escalates into potential violence. Advantus is eager to assist in the resolution of employee disputes and will not discipline employees for raising such concerns.

**Hurricane Preparation and Recovery Plan**

**I. General**

Prior to the start of hurricane season (June 1 – November 30), management will ensure that the Hurricane Preparation and Recovery Plan is reviewed and any changes or modifications necessary are completed.

1. **Corporate- Hurricane Preparation Team**

The hurricane preparation team will be responsible for monitoring and assessing the hurricane. The team will determine the appropriate steps to ensure the safety of employees and the security of all facilities.

1. Kevin Carpenter, President – ext. 8240 or 904.759.4404
2. Bryan Dunford, Executive Vice President – ext. 8778 or 801.830.8980
3. Marc McDuff, VP, Shared Services – ext. 8286 or 714.225.4972
4. Ernest Taylor, Director, IT – ext. 8450 or 904.318.3792
5. Paula Olszewski, VP, Shared Services ext. 8257 or 412.443.0650

The hurricane preparation team will conduct daily meetings beginning approximately 1 week prior to landfall, if possible.

1. **Hurricane Tracking**

The hurricane preparation team will monitor weather reports and communicate as necessary to employees and will be responsible for monitoring the storm’s progress. Once the storm is within 96 hours of St. Johns, Duval, Clay, or Nassau County, preparations will begin to secure the facilities.

Employees will be provided with updates as they become available. Communication will occur through email, phone, or via text.

All employees will be directed to call the Advantus Hotline for up-to-date information.

**904.482.0098 is the Hotline Number. Messages will be left for employees regarding the opening and closing of facilities.**

1. **Office Closing**

Management recognizes that employees have family and property commitments, which must be met prior to a severe tropical storm or hurricane hitting the area. These responsibilities may include the evacuation of a family. Therefore, the following steps will initiate an official closing:

**Level I**

The hurricane preparation team will closely monitor the location and movement of any severe storm which approaches and enters the Caribbean.

**Level II**

Upon announcement by the National Hurricane Center that a severe storm could move into North Florida within 96 hours, IT and Facilities will verify that all storm supplies are available.

**Level III**

When the National Hurricane Center announces a **severe tropical storm or hurricane watch for North Florida with expected landfall within 72 hours,** management will instruct employees to begin preparation tasks.

**Level IV**

When the National Hurricane Center announces a **severe tropical storm or hurricane warning for North Florida with expected landfall within 24 - 48 hours,** preparation tasks must be completed, and the office will close as quickly as possible.

1. **Office Re-opening**

The office is expected to re-open approximately 24 hours after the storm passes. Supervisors are responsible for contacting all employees in their respective departments to confirm the return to work in addition to requiring employees to call the **Emergency Hotline number at 904.482.0098.**

1. **Post Storm Procedures**

Department Managers should be available via cell and/or home phone to receive instructions on reopening and communicate to employees.

**General Office Checklist:**

* All computers and peripherals should be unplugged, the cables and surge protectors removed from the floor, and stored in plastic.
* All desktop computers and printers are to be wrapped in plastic and taped. Allow equipment to cool for five (5) minutes before wrapping.
* All lightweight computer peripherals should be disconnected and placed in a desk drawer or moved to an inter-room with no windows.
* Whenever possible, all critical or high-value equipment should be elevated at least six inches off the floor in case of water seepage or flooding.
* Clear your desk, shelves, bookcases, etc., of all objects and papers by placing them in drawers or overhead bins. If these items cannot be placed in your desk or cabinets, place them in a large plastic bag(s). This is especially important in offices with windows. Personal items should be taken home.
* Critical file cabinets (legal, financial, human resources) should be covered and sealed as completely as possible with plastic and taped to prevent water infiltration.
* Department Managers should ensure:
  + Communications of closings and facility plans with their departments.
  + Update emergency contact lists for their departments.
  + Provide employees emergency hotline number.
  + Cover all electronic equipment in their departments.

**Distribution Center Checklist:**

* Review contents of Hurricane Kits and replace any missing or defective items.
* Update emergency contacts lists for all department managers/supervisors
* Verify contact information for all employees in your group.
* Make arrangements for all non-company trailers to be removed (contact as early as possible)
* Make arrangements to have all un-usable pallets picked up and removed from the site
* Make arrangements to be sure fuel tanks for generators are full on May 1.
* Ensure that all supervisors/managers have access to master key.
* Call for pick up and emptying of all trash containers
* Call the alarm company and put the system on test during the storm.
* Call primary carriers to ensure pick-up is scheduled. Move propane tank cage inside.
* Move all loose trash cans, barrels and tables inside.
* Keep uprights, lifts, reach trucks and pallet jacks as fully charged as possible.
* Shut power down to all charging stations at electrical breaker.
* Move all material handling equipment to center of plant.
* If the server is powered off, engage generator shut-down.
* Move all product away from dock doors.
* Place stacked pallets against dock doors to brace against wind.
* Perform final safety inspection of aerosol station.
* Perform final yard walk-about to make sure that all loose debris has been removed.

**Distribution Center Hurricane Kit Contents:**

* Flashlight (x4)
* Batteries
* Multi-tool
* Masking Tape
* Gloves (multiple pairs and sizes)
* Garbage Bags
* Small Writing pads and pens
* Box Cutters
* Advantus Hurricane Plan
* Contents list

**IT Power Down Procedure Checklist**

* Download configuration files from Watchguard and upload a copy to SharePoint.
* Ensure Veeam backups are complete and are uploaded to Azure.  Depending on the timing of a pending hurricane, the full backups may need to be changed to incremental so that they can be completed in time.
* Open VMware web interface
* Enter each VM and power it down.  Complete the last servers in this order:
* ADVANTUS-SQL
* ADC-ADCORP01P
* ADC-CONTROL
* Power down the Nimble Array
* Power down the Synology box
* Power down the Netgear storage arrays (used by Veem backups for copy to Azure)
* Ensure all computers and storage are off
* Put UPS in battery bypass mode
* Set breakers to bypass and flip the main power disconnect on UPS
* Turn off UPS breaker in panel
* Wrap servers in plastic across the top and sides after internalizing all gear on top of the rack

**Non-Discrimination & Harassment**

Advantus Corp is committed to a work environment in which all individuals are treated with respect and dignity. Everyone has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Therefore, Advantus expects that all relationships among persons in the office will be business-like and free of bias, prejudice and harassment.

**Equal Employment Opportunity**

It is the policy of Advantus to ensure equal employment opportunity without discrimination or harassment based on race, color, religion, sex, sexual orientation, age, disability, marital status, citizenship or any other characteristic protected by law. Advantus prohibits any such discrimination or harassment.

**Retaliation Is Also Prohibited**

Advantus encourages reporting of all perceived incidents of discrimination or harassment. It is the policy of Advantus to investigate such reports. Advantus prohibits retaliation of any kind against any individual who reports discrimination or harassment or participates in an investigation of such reports.

**Definitions of Harassment**

Sexual harassment constitutes discrimination and is illegal under federal, state and local laws. For the purposes of this policy, sexual harassment is defined, as in the Equal Employment Opportunity Commission Guidelines, as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when, for example:

1. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; and/or
2. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
3. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment may include a range of subtle and not so subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include, but are not limited to unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering, whistling or touching; insulting or obscene comments or gestures; display in the workplace of sexually suggestive objects or pictures; and other physical, verbal or visual conduct of a sexual nature.

Harassment based on any other protected characteristic is also strictly prohibited. Under this policy, harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his /her race, color, religion, sex, sexual orientation, national origin, age, disability, marital status, citizenship or any other characteristic protected by law or that of his/her relatives, friends or associates, and that:

1. has the purpose or effect of creating an intimidating, hostile or offensive work environment.
2. has the purpose or effect of unreasonably interfering with an individual's work performance; or
3. otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes, but is not limited to epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group and that is placed on walls or elsewhere on the employer's premises or circulated in the workplace.

**Individuals and Conduct Covered**

These policies apply to all applicants and employees, whether related to conduct engaged in by fellow employees or someone not directly connected to Advantus *(e.g., an outside vendor, consultant or customer).*

Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

**Reporting an Incident of Harassment, Discrimination or Retaliation**

Advantus encourages open communication as the first step in resolving internal issues such as harassment. As such, the company encourages individuals who believe they are being subjected to such conduct to promptly advise the offender that his or her behavior is unwelcome and request that it be discontinued. Often this action alone will resolve the problem. Advantus recognizes, however, that an individual may prefer to pursue the matter through informal or formal complaint procedures.

Advantus also encourages reporting of all perceived incidents of discrimination, harassment or retaliation, regardless of the offender's identity or position. Individuals who believe that they have been the victim of such conduct should discuss their concerns with their immediate supervisor; Human Resources; the Company President, or any member of management as designated by the Organization. (*See the Complaint Procedure described below.)*

**Complaint Procedure**

***Informal Process***

If for any reason an individual does not wish to address the offender directly, or if such action does not successfully end the offensive conduct, the individual should notify his/her immediate supervisor; Human Resources; or any member of management, who may, if the individual so requests, talk to the alleged offender on the individual's behalf. In addition, there may be instances in which an individual seeks only to discuss matters with one of the Advantus designated representatives, and such discussion is encouraged.

An individual reporting harassment, discrimination or retaliation should be aware; however, that Advantus may decide it is necessary to take action to address such conduct beyond an informal discussion. This decision will be discussed with the individual. The best course of action in any case will depend on many factors and, therefore, the informal procedure will remain flexible. Moreover, the informal procedure is not a required first step for the reporting individual.

**Formal Process**

As noted above, individuals who believe they have been the victims of conduct prohibited by this policy statement or believe they have witnessed such conduct should discuss their concerns with Human Resources; the Company President, or any member of management as designated by the company.

Advantus encourages the prompt reporting of complaints or concerns so that rapid and constructive action can be taken before relationships become irreparably strained. Therefore, while no fixed reporting period has been established, early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment.

Any reported allegations of harassment, discrimination or retaliation will be investigated promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge.

Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action.

Retaliation against an individual for reporting harassment or discrimination, or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action. Acts of retaliation should be reported immediately and will be promptly investigated and addressed.

Misconduct constituting harassment, discrimination or retaliation will be dealt with appropriately. Responsive action may include, for example, training, referral to counseling and/or disciplinary action such as warning, reprimand, withholding of a promotion or pay increase, reassignment, temporary suspension without pay or termination, as Advantus believes appropriate under the circumstances.

If a party to a complaint does not agree with its resolution, that party may appeal to the Company President or their designated appointee.

False and malicious complaints of harassment, discrimination or retaliation as opposed to complaints which, even if erroneous, are made in good faith, may be the subject of appropriate disciplinary action as well.

**Conclusion**

Advantus has developed this policy to ensure that all its employees can work in an environment free from harassment, discrimination and retaliation. Advantus will make every reasonable effort to ensure that all concerned are familiar with these policies and aware that any complaint in violation of such policies will be investigated and resolved appropriately.

Any employee who has any questions or concerns about these policies should talk with their immediate management or Human Resources.

Finally, these policies should not, and may not, be used as a basis for excluding or separating individuals of a particular gender, or any other protected characteristic, from participating in business or work-related social activities or discussions. In other words, no one should make the mistake of engaging in discrimination or exclusion in order to avoid allegations of harassment. The law and the policies of Advantus prohibit disparate treatment on the basis of sex or any other protected characteristic, with regard to terms, conditions, privileges and perquisites of employment. The prohibitions against harassment, discrimination and retaliation are intended to complement and further those policies, not to form the basis of an exception to them.

**Drug Free Workplace**

Advantus has posted notices in conspicuous locations identifying our company as a Drug Free

Workplace. Copies of the Drug Free Workplace policy are available for inspection at each of our

facilities. Our Drug Free Workplace Policy now formally states that substance abuse will not be

tolerated **ON** or **OFF** the job for employees of our company. This prohibition includes the

possession, use or sale of illegal drugs, the abuse of alcohol and abuse of prescribed drugs.

Company sponsored activities or other social events that we attend during which alcoholic

beverages are served are not considered alcohol abuse just because alcohol was served.

All employees are expected to sign a statement of understanding and agreement with the

company's Drug Free Workplace Policy.

To ensure that this **company** remains a Drug Free Workplace, a program of drug testing is in

effect. Let it be clearly understood that it is a condition of employment for everyone that they

avoid entirely the use, possession, sale or any association whatsoever with illegal drugs and/or

the abuse of alcohol. Employees who are found on the job to be under the influence of illegal

drugs or alcohol or who violate this policy in other ways will be terminated. It is important that

all of us work together to deal with substance abuse to make our company a safer and more

rewarding place to work.

**DRUG FREE WORKPLACE PROGRAM**

**I. STATEMENT OF POLICY**

In order to establish Advantus Corp. as a Drug Free Workplace and thereby increase the safety

and health of our employees and their families, this Policy requires that employees of our

Company shall not use drugs illegally at any time, shall not use or be under the influence of

alcohol while working and shall not use or be under the influence of medications, while working,

that could affect their ability to work safely.

**II. DEFINITIONS**

**Alcohol:** Liquids containing ETHYL ALCOHOL (ETHANOL).

**Drugs:** One or more of the following named substances: AMPHETAMINES, CANNABINOIDS

(MARIJUANA), COCAINE, PHENCYCLIDINE (PCP), METHADONE, PROPOXYPHENE.

OPIATES, METHAQUALONE, BARBITURATES, BENZODIAZEPINES,

See Section M for common brand Names.

**Medications:** Prescription and Non-prescription substances obtained and used legally to combat

illness and injury or for other therapeutic reasons.

**Work (ing):** Performing any activity under any conditions during any period of time that an

employee is covered by the Employer's Workers' Compensation insurance (i.e. driving, on duty,

on call or performing any tasks as a part of employment duties; lease and contract employees

included).

**Influence:** To be physically, mentally or emotionally subject to the effects of any substance.

**Company**: Advantus Corp.

**Employer:** Advantus Corp.

**Employee**: Anyone employed by or contracted with the company who is covered by workers'

compensation insurance obtained by the company.

**Use (ing)**: As pertains to drugs, alcohol and medications; to drink, smoke, apply topically, inject,

possess, solicit, distribute, dispense, manufacture or transfer.

Exceptions to these rules regarding the definition of "use" will be allowed only with

Management's written permission.

**III. POLICY WORK RULES**

**A. DRUGS**

Employees shall not use or be under the influence of drugs illegally at any time, whether working or not working.

**B. ALCOHOL**

Employees shall not use or be under the influence of alcohol while working.

**C. MEDICATIONS**

Employees shall not use or be under the influence of medications while working if the

medications have the potential to alter or to adversely affect their judgment, motor skills, to

induce sleepiness or to otherwise detract from their safe job performance. Exceptions can, of

course, be made in work areas and activities of decreased safety sensitivity where the potential

for accident and injury is minimal and where the effect of the medication on the employee is

judged to be no factor by medical authority. It must also be acceptable to management for the

employee to continue work. Exceptions to this rule (Section C) will be made at least one level of

supervision above the concerned employee's immediate supervisor. Employees will report the

use of medications to their supervisor before beginning work; those sensitive to the disclosure of their use of certain medications may call or visit the company official (see name and telephone number in Section N) in charge of the Drug Free Workplace Program, in confidence to resolve their unique work situation.

**D. DRUG FREE WORKPLACE PROGRAM MONITORING**

To measure the success of, and to aid in enforcing, our Drug Free Workplace Program, the

following types of drug screening tests will be administered to detect the presence of

AMPHETAMINES, CANNABINOIDS (Marijuana), COCAINE, PHENCYCLIDINE (PCP)

AND OPIATES.

1. Job applicants, as a condition of obtaining employment

2. Employees who are required to undergo FITNESS FOR DUTY MEDICAL

EXAMINATIONS.

3. Employees as a FOLLOW-UP to a return from rehabilitation program. These employees will be tested periodically.

4. Employees who, by reliable evidence, or by their observed or reliably reported behavior, may be REASONABLY SUSPECTED of: (a) Using or being under the influence of drugs, alcohol or medications while working. (b) Tampering with a drug screen test. (c) Causing or contributing to an accident involving a reportable injury (i.e., an injury sufficient to require the attention of a medical professional), lost time and/or property damage sufficient to delay or halt work. All specimens must be provided by the employees as soon as possible but not later than 32 hours after the accident.

5. UNDER A RANDOM TESTING SCHEDULE, 10 PERCENT OF THE WORKFORCE

TO BE TESTED ANNUALLY WITH EMPLOYEES SELECTED QUARTERLY FOR

RANDOM TESTING**.**

Notice of Drug Testing will be given on all vacancy announcements. In addition to the drugs

named in Section D above, a test for the presence of alcohol will be administered as a result

of the conditions stated in Section D.4. (a), (b) and (c) above. A blood specimen will also be

provided for the alcohol test. The blood test for alcohol must be performed by a Florida AHCA

licensed laboratory. See Section N for the Florida laboratory name, address and phone number.

A copy of documentation supporting a REASONABLE SUSPICION drug and alcohol test will

be completed within seven (7) days after testing, will be provided to the employee upon request,

and will be retained confidentially by the company for at least one (1) year. Testing for the presence of drugs and alcohol will be performed by an HRS approved laboratory after obtaining urine specimens for drug tests and blood samples for alcohol tests. All positive specimens from the initial screening are then tested a second time using a different technique and chemical principal from the initial test to insure reliability and accuracy. All test results are reported to the Medical Review Officer for verification prior to being transmitted to the employee and/or employer.

**E. CONSEQUENCES TO EMPLOYEES OF:**

1. POSITIVE CONFIRMED DRUG OR ALCOHOL TESTS

2. REFUSAL TO BE TESTED FOR DRUGS OR ALCOHOL

3. ANY PLEA OF GUILTY OR NOLO CONTENDERE TO ANY

VIOLATION OF CHAPTER 893 OR OF ANY CONTROLLED

SUBSTANCE LAW OF THE UNITED STATES OR ANY STATE, FOR A

VIOLATION OCCURRING IN THE WORKPLACE.

4. CONSUMPTION OF ALCOHOL OR INTOXICATION ON COMPANY

TIME.

a. Job Applicants will not be hired.

b. Employees being tested in conjunction with a physical examination, as a follow-up to rehabilitation, as a result of reasonable suspicion behavior, a random test or because of contributing to or causing an accident (no injury involved) will FACE DISCIPLINARY ACTION UP TO AND INCLUDING TERMINATION OF EMPLOYMENT.

Injured employees, in addition to above disciplinary action, will also forfeit eligibility for workers' compensation medical payments and indemnity payments.

1. Employees arrested, indicted or convicted of violating controlled substance laws will notify the employer within five (5) days of the event and if this substance abuse policy was also violated, will be disciplined up to and including termination, depending on the circumstances.

2. In the event under this policy an employee is required to seek a treatment plan, it will be at the employee’s expense. The employee must provide documentation of that treatment program and be required to be drug and/or alcohol tested unannounced EVERY SIX MONTHS FOR TWO YEARS. **A positive confirmed test during or after treatment will result in termination of employment.**

**F. CHALLENGES TO CONFIRMED POSITIVE TEST RESULTS**

A job applicant or employee will receive written notification of positive confirmed test results

from the company within five (5) working days of the company's receipt of a report of a positive confirmed test result from the Medical Review Officer. This notification will also state the consequences of the positive confirmed test result. A job applicant or employee who receives written notification of (1) a positive confirmed test result and (2) the consequences to the employee of that result, will have the opportunity within five (5) working days to explain or contest the result. If the explanation or challenge of the positive test result is judged unsatisfactory by the company, the job applicant or employee will be provided with a written explanation as to why the explanation of the positive test result was unsatisfactory, along with a written report of the positive test results within fifteen (15) working days. If the test was for reasonable suspicion, the employee will receive in writing within seven (7) days after the test, if requested, a detail of the circumstances, which formed the basis of the determination that enough reasonable suspicion existed to warrant the testing. During the 180-day period after written notification of a positive test result, the employee who provided the specimen should be permitted by the employer to have a portion of the specimen retested at the employee's expense. Such re-testing shall be done at another Florida HRS licensed or NIDA approved laboratory, as appropriate, chosen by the employee or job applicant. All such documentation will be kept confidential and retained by the company for at least one (1) year. Should the job applicant or employee then choose to further pursue the challenge, the following options **to** the employee are available: (1) Any rights under applicable collective bargaining agreements may be exercised. (2) A claim for benefits may be filed with a Judge of Compensation pursuant to Chapter 440 F.S. in the case of workplace injury. (3) If no injury has occurred, a challenge may be undertaken in a court of competent jurisdiction. It will then be the employee's responsibility to notify the laboratory to retain the sample until the case is settled.

The company will provide a form to the employee to provide any information he/she considers

relevant to the drug test for review by the Medical Review Officer.

**G. CONFIDENTIALITY OF DRUG TESTING INFORMATION**

All written reports and related information received by the company, laboratories, employee

leasing programs, drug and alcohol rehabilitation programs and their agents will be held in

strictest confidence and will not be disclosed except in accordance with Florida Statutes or

otherwise legally disclosed. Release of such information under any other circumstance shall be

solely pursuant to a written consent form signed voluntarily by the person tested. Information on drug test results shall not be released or used in any criminal proceeding against the employee or job applicant.

Agents of our company and the laboratory conducting a drug test will, however, have access to

drug test information when consulting with legal counsel in connection with actions brought

against them when the information is relevant to its defense in a civil or administrative matter.

**H. CONFIDENTIAL REPORTING OF MEDICATION USE**

The company knows that eventually most people need to take medications to combat various

illnesses. Employees must realize, however, that many medications will alter or affect a drug test. An employee could possibly test positive for a drug when taking medications prescribed by a doctor or bought over the counter at a pharmacy. Medications known to alter or affect a drug test are listed in Section M. The name of the testing laboratory is listed in Section N. Employees who want more technical information about medications may consult the testing laboratory. To avoid the potential problems created by a false test result, the company has implemented procedures to enable employees to confidentially report the use of medications. You may report the use of medications on the back of your copy of the chain of custody form after your specimen is collected and discuss only with the MRO.

**I. EMPLOYEE ASSISTANCE PROGRAM**

Our company maintains an Employee Assistance Program (EAP) that consists of referring

employees and their families who suffer from alcohol or drug use problems to local drug and

alcohol rehabilitation centers. The telephone directory yellow pages, under "Drug Abuse and

Addiction - Information and Treatment", lists the names and locations of treatment centers. Also, the United Way, listed in the telephone directory white pages, offers many confidential services at no charge. Any costs of outside services are, however, the employee's responsibility.

Any employee who has not previously tested positive for drug or alcohol use and has not yet entered a drug and/or alcohol abuse rehabilitation program, may seek assistance for drug and alcohol problems before they lead to disciplinary actions.

No employee will be discharged, disciplined or discriminated against solely upon the employee's

voluntarily seeking treatment for a drug/alcohol related problem if the employee has not

previously tested positive for drug use, entered an employee assistance program for drug related problems, or entered an alcohol and drug rehabilitation program.

If an employee wishes to pursue help through the EAP, please contact the person listed in

Section N for appropriate referral. In addition, Section O lists national hotline numbers for drug

and alcohol problems.

**J. AUTHORITY TO ESTABLISH A DRUG FREE WORKPLACE PROGRAM**

The company's Drug Free Workplace Program has been established in accordance with U.S.

Federal and Florida's State Law; specifically, F.S. Section 440.101 Drug Free Workplaces; F.S.

440.102, Drug Free Program requirements, F.S. 440-09, Coverage and Rule Chapters 38F-9.001

through 38F-9.014 of the Florida Administrative Code, Drug Testing Rule of the Division of

Workers' Compensation of the Department of Labor and Employment Security; F.S. Section

287.087, Procurement of Fla, D.O.T. Contractual Services; F.S. Chapter 893 Drug Abuse

Prevention and Control.

**K. FEDERAL AND STATE LAWS AND REGULATIONS**

Nothing in this statement of policy shall be presumed to override, amend or change any

requirements of Florida and/or Federal law. In the event any of the provisions of this policy

conflict with applicable laws and regulations, such laws and regulations will be deemed to

control.

**L. AMENDMENT AND SEVERABILITY**

This policy may be amended in any and all respects at any time by the employer. If any

provision of this policy or the application thereof to any party or circumstance is held invalid or

unenforceable, the remainder of the terms of this policy and the application of any invalid or

unenforceable provisions to other parties or circumstances will not be affected thereby, and to

this end the provisions of this policy are severable.

**M. SUBSTANCES WHICH COULD ALTER OR AFFECT THE OUTCOME OF A DRUG TEST**

(BRAND NAMES AND COMMON NAMES)

1. **AMPHETAMINES:** Abetrol, Biphetamine, Desoxyn, Dexedrine, Didrex

2. **CANNABINOIDS:** Marinol (Dronabinol, THC), Marijuana, Hash Pot

3. **COCAINE:** Cocaine HCI topical solution (Roxanne), Crack, Coke

4. **PHENCYCLIDINE:** Not legal by prescription; PCP, Angel Dust

5. **OPIATES**: Paregoric, Parepectolin, Donnagel PG, Morphine, Tylenol with Codeine,

Empirin with Codeine, APAP with Codeine, Aspirin with codeine, Robitussin AC,

Guiatuss AC, Novahistine DH, Novahistine Expectorant, Dilaudid (Hydromorphone), MS

Contin and Roxanol (morphine sulfate), Percodan, Vicodin, Opium, Heroin

6. **METHAQUALONE:** Not legal by prescription

7. **BARBITURATES**: Phenobarbital, Tuinal, Amytal, Nembutal, Seconal, Lotusate,

Fiorinal, Firoicet, Esgic, Butisol Mebaral, Butabarbital, Butabital

8. **METHADONE**: Dolphine, Methadose

9. **BENZODIAZEPINES:** Ativan, Azene, Clonopin, Dalmane, Diazepam, Librium, Xanax,

Serax, Tranxene, Valium, Verstran, Halcion, Paxipam, Restoril, and Centrax

10. **PROPOXYPHENE:** Darvocet, Darvon N, Dolene, Etc.

11. **ALCOHOL:** Liquid medications containing ethyl alcohol (ethanol). Please read the label

for alcohol content. As an example, Vick's Nyquil is 25% (50 proof) ethyl alcohol.

Comtrex is 20% (40 proof); Contac Severe Cold Formula Night Strength is 25% (50

proof) and Listerine is 26.9% (54 proof); Booze, Drink

**N. DRUG FREE WORKPLACE POLICY - INFORMATION AND REVISION SHEET**

**1. Company Location:**

Advantus Corp.

12276 San Jose Blvd #618

Jacksonville, FL 32223

(904) 421-1036

**2.** **Drug Testing Laboratory:**

Labcorp OTS

1120 Main Street

Southhaven, MS 38671

800-749-3993

**3. Collection Site:**

AMRO

P.O. 550749

Jacksonville, FL 32255-0749

(904) 332-0472

**4. MRO:**

AMRO

Dr. Freedman

P.O. 550749

Jacksonville, FL 32255-0749

(904) 332-0472

**For EAP (Employee Assistance) Referral:** Section O lists national hotline numbers for drug

and alcohol problems. Employees being tested because of causing or contributing to an accident will ensure that both the urine and blood specimens are sent to the laboratory named above.

**O. NATIONAL HOTLINE NUMBERS**

· Alcohol and Drug Referral Hot Line 1-800-252-6465

· Child Help's - National Child Abuse Hot Line 1-800-422-4453

· National A.I.D.S. Hot Line 1-800-342-2437

· National Cocaine Hot Line 1-800-262-2463

· National Hepatitis Hot Line 1-800-223-0179

· National Runaway Switchboard and Suicide Hot Line1-800-621-4000

· National Sexually Transmitted Disease Hot Line 1-800-227-8922

· Suicide and Rape 24-Hour Emergency Services 1-800-333-4444

**P. NATIONAL ASSISTANCE GROUPS**

· Alcoholics Anonymous 1-800-344-2666

· Food and Drug Administration 1-301-443-1240

· M.A.D.D. 1-800-438-6233

· Narcotics Anonymous 1-818-780-3951

· Nat'l Assoc. for Children of Alcoholics 1-714-499-3889

· National Association of Anorexia Nervosa and Associated Disorders 1-312-831-3438

· National Council of Child Abuse and Family Violence 1-800-222-2000

· National Federation of State High School Associations Target Programs 1-800-366-6667

· Nat'l Institute of Drug Abuse, Drug Info. Treatment 1-800-662-4357

· Parents Anonymous National Office 1-800-421-0353

· S.A.D.D. 1-508-481-3568

· Tough Love 1-800-333-1069

**Post-Accident Testing**

As an employee of Advantus Corporation, your health and safety as well as the safety of other Advantus Corp. employees is one of our highest priorities. As such, Advantus is committed to the creation and enforcement of a drug free environment.

As a result of any work-related accident or accident investigation, you as an Advantus employee *(or employee of any temporary service used by Advantus)* at the sole discretion of Advantus Corp., will be required to submit to a drug and/or alcohol test within 24 hours of the incident.

A confirmed positive drug and/or alcohol test result will produce the following action(s):

1. If you have been with Advantus less than ninety (90) consecutive days, your employment with Advantus will be terminated.
2. If you have completed 90 consecutive days of employment with Advantus, you may at the sole discretion of Advantus, be provided the opportunity for rehabilitation, provided it is your first and only violation. Your continued employment with Advantus will be contingent upon your successfully completing a treatment program and remaining substance free *(to be verified through random drug testing)* for a period of two (2) years.

If you are in a safety-sensitive position *(determination to be made by Advantus)* you may:

* + Be removed from your position and be placed on administrative leave pending test results; or
* Advantus may choose to place you in a non-safety sensitive position until the test results are received. Such work will be at an appropriate pay scale and, in the sole judgment of Advantus, will not endanger the safety of your coworkers, the general public or pose an unreasonable risk to Advantus Corp.
* If you are injured in a work-related accident that proves to be drug/alcohol related, in addition to the above consequences, you may also forfeit your eligibility for Workers’ Compensation benefits.

1. If you refuse to submit to a post-Accident drug and/or alcohol test, your employment with Advantus will be terminated and you will forfeit your eligibility for Workers’ Compensation benefits.
2. If it is determined that you provided an adulterated urine sample, *(one that is proven to have had substances added to it to mask potential drugs in the system)* your employment with Advantus will be terminated.
3. If your employment with Advantus is terminated as a result of a violation of Advantus’ Post-Accident testing policy, you may also be denied unemployment benefits.

**Medical Marijuana Use**

Advantus Corp is committed to protecting the safety, health, and well-being of every employee in our workplace.

Florida law allows for the controlled use of medical marijuana. Although employees who legally obtain a medical marijuana registration card from the Florida Department of Health are allowed to possess and consume certain quantities of marijuana, doing so is not permitted on Company property or at Company sponsored events (either on or off Company property).

We recognize the use of marijuana for medicinal purposes and respect the rights of employees to engage in responsible and legal marijuana use. The Company may in its discretion seek to accommodate legally recognized Florida medical marijuana users when possible.

In the event an employee arrives to work in an impaired state under the influence of medical marijuana, his or her work suffers because of its use, or there is a safety risk for any employee, the Company reserves the right to take disciplinary action against the employee, up to and including termination of employment.

**06.22.2018**

**Alcohol Consumption at Company Functions**

**Overview and Policy Statement**

Excessive alcohol consumption may endanger the health and safety of Advantus employees and others around them. It is Advantus’s policy to take steps to limit the consumption of alcohol at company functions. The possession, consumption, or use of alcoholic beverages at company functions may occur only with prior, written approval from the executive (EVP or higher) overseeing the department who is conducting the event. All employees (both permanent and temporary) are responsible for adherence to company policy. Failure to do so may result in disciplinary action up to and including termination or the ending of the seasonal or temporary assignment.

**Eligibility and Scope**

* This policy is applicable to all employees of Advantus, including seasonal and temporary employees.
* Company functions to which this policy applies include, but are not limited to trade shows, receptions or events for business contacts, retirement or anniversary parties, baby showers, birthdays, company or department outings, and year-end or holiday events.

**Applying the Policy**

* Alcohol is not permitted in any Advantus workplace or during business hours.
* Employees who choose to drink alcoholic beverages at off-site company functions are expected to behave in accordance with usual business standards and all company policies. It is unacceptable for employees to consume excessive amounts of alcoholic beverages at any event when representing Advantus.
* Advantus will pay for a maximum of two (2) servings of alcoholic beverages per person at an approved off-site company function.
* If Advantus provides an alcoholic beverage to an employee or an employee’s guest and there is any question that a driver is impaired, then Advantus will reimburse the reasonable costs of alternative transportation home.
* Alcoholic beverages must be served, rather than simply made available, to those who wish to partake. Self-serving of alcoholic beverages at company functions is strictly prohibited.
* Food must be served or made available with any alcoholic beverage.
* Alcohol is not to be served to minors or anyone who appears to be impaired.

**07.02.19**

**Personal Use of Vehicles**

Personal vehicles may be used for company business with supervisory approval.

Advantus Corp will reimburse you at the current approved rate for all mileage directly related to the business use. The reimbursement is intended to cover fuel, oil, and mechanical repairs. Additionally, Advantus Corp will reimburse you for certain out of pocket expenses including tolls and parking. Employees must submit an expense report to be eligible for reimbursement.

To be eligible for permission to use a personal car or truck on company business and receive reimbursement, you must have and provide proof of a valid operator's license and personal automobile insurance. The personal automobile insurance must provide liability coverage limits of at least $100,000/$300,000 Bodily Injury, $50,000 Property Damage. Comprehensive and Collision is suggested but not required. These limits are considered the minimum allowable coverage.

Advantus Corp will not reimburse you for the loss of equipment or accessories nor pay for your deductible in the event of a loss or accident. Parking tickets, tickets for infractions, and all related expenses are strictly the responsibility of the employee and will not be reimbursed.

If you have an accident in your personal vehicle while on company business, you must notify Advantus Corpin addition to following the procedures established for notification required by your insurance carrier.

Employees are prohibited from using their personal vehicle for passenger transport, such as rideshare (Uber, Lyft) or on-demand food/package delivery (Grub Hub, Door Dash), while on company business.

04.16.2021

**Distracted Driving**

At Advantus Corp, we value the safety and wellbeing of all employees and are committed to ensuring a safe working environment. With the proliferation of electronic device and in-vehicle information and entertainment system use while driving, we enforce the following distracted driving policy.

Hands-free is not risk free. Numerous studies have demonstrated that the use of handheld and hands-free devices while driving pose a significant safety risk to motorists, their passengers and others on the road.

Advantus Corp employees shall:

* Not use handheld or hands-free mobile electronic devices or voice features in vehicles while operating a motor vehicle.
* Turn on the “Do Not Disturb” feature on smartphones and other mobile devices. If the feature is not available, turn off or silence mobile devices to prevent distraction.
* Pull over to a safe place out of traffic lanes and put the vehicle in “Park” if a call or text must be made.
* Inform clients, associates and business partners of this company policy to explain why calls, texts or emails may not be returned immediately.
* Program any global positioning system (GPS), music device, or dashboard/voice system prior to departing. If adjustments are needed while driving, pull over to a safe place out of traffic lanes and put the vehicle in “Park” to make the appropriate adjustment.

Electronic distractions are only one type of distraction. Drivers should also refrain from eating, drinking, reading and other activities that may divert attention away from the task of driving.

Advantus Corp is committed to keeping our workers safe and holding our employees to the highest standard of safety. This is so important that violations of this policy may result in disciplinary action, up to and including termination.

04.16.2021

**Employee Travel**

**04.16.2021**

**Approval of Travel**

All travel must be approved by your immediate supervisor/manager.

**Payment for Travel**

For travelers that have been issued a company credit card, this card should be used for all approved travel, including airfare, lodging, etc. where possible. If the corporate card is not accepted or otherwise cannot be used, other methods such as cash or personal credit card can be used, and expenses submitted to the company for reimbursement. Receipts must be obtained and submitted for all expenses, including receipts for expenses on the company credit card. Credit card bills are paid directly by the company to credit card company. It is the employee’s responsibility to maintain their expenses through the Concur system and submit it for approval as requested at the end of each month.

**Transportation**

Transportation expenses will be reimbursed based on the most economical mode of transportation, using the most traveled route consistent with the purpose of the trip.

**Air Travel**

Coach class or other discounted class airfare should be used for air travel. Employees booking travel for themselves or for others should avoid upgrading tickets for the purposes of priority boarding or priority seats. If a higher priced fare is selected at the time of booking for priority boarding or seats, the employee will be responsible for reimbursing the company for the difference in fare.

Tickets should be booked a minimum of 21 days in advance, where possible, to take advantage of the most economical airfares. When possible, book tickets directly through the airline’s own website (delta.com, united.com, aa.com, etc.) as lower fares are often available on their site. Low fare airlines such as Southwest should be used were possible. Today, many airlines are adding extra charges for services such as changing a ticket or flying standby. These extra charges should be avoided where possible. Southwest does not charge extra for canceled or changed tickets, so if your plans might change, please check flight availability with Southwest.

If flying Delta, please give Delta the following Sky Bonus number - US592304539. This number is a corporate Advantus number and will not affect your Frequent Flyer account in any way. You will still earn the FF points. To add the Sky Bonus number, tickets must be booked directly with Delta at Delta.com.

If flying American Airlines, please give American the following Business ExtrAA Program number – 785729. Like the Delta program, it will not affect your Frequent Flyer account in any way.

Airfare over $500 must be approved by your immediate supervisor/manager.

**Parking**

Any airport parking should be done in Long Term or off airport discount lots.  USA Park at Jacksonville International Airport offers covered and uncovered parking at discounted rates and 24/7 shuttle service to and from the airport.  For all travelers flying out of JIA, USA Park must be used for parking.  You can sign up at <https://www.usapark.net/signup> .

In most cities, airport discount parking is available at hotels or motels near airports or at discount parking company lots that have shuttle buses. No short term, hourly or daily lots should be used.

**Automobile Travel**

Business miles driven in a private vehicle are reimbursed at the federal rate per mile, which is listed on the Travel Expense Report located under Shared Documents - Accounting on the Wiki. This reimbursement covers all automobile expense such as fuel, service, repairs, insurance, etc. Mileage is computed as the actual miles driven between the traveler’s headquarters (homes for those travelers working remotely) and the destination, using the shortest or most traveled route.

Employees are prohibited from using their personal vehicle for passenger transport, such as rideshare (Uber, Lyft) or on-demand food/package delivery (GrubHub, Door Dash), while on company business.

Expenses related to the purchase of meals locally are not reimbursable. Mileage will not be paid for trips to and from local restaurants, grocery stores, etc.

Travel between HQ and the 12th Street warehouse for required business travel is reimbursed at 26 miles each way.

<http://wiki.advantus.com/accounting/accounts-payable/expense-report/>

**Rental Cars**

A vehicle may be rented when it is more advantageous to the company than other means of transportation such as a taxi or Uber/Lyft. Reservations should be made and a compact or economy vehicle requested. Rental cars should be booked with Hotwire.com or Priceline.com when at all possible, to obtain the most favorable rates. Costco members should also check Costco.com as more favorable rates are often available.

Travelers renting cars should obtain a copy of the Fleet Insurance Identification Card from the HR department prior to renting a vehicle. Always carry this card while renting the vehicle. This is your proof of insurance on the rental car. Additional insurance coverage on the vehicle should be declined.

**Miscellaneous Transportation Related Expenses**

Charges for tolls, bridges, ferries, taxis, buses, trains and parking while on company business may be claimed. As an alternative to traditional taxis, Uber or Lyft should be used whenever possible. You can download the Uber or Lyft app on your smartphone.

**Lodging**

Lodging for overnight stays while on company business is reimbursable at the actual cost of lodging, including applicable taxes. Lodging should be reserved to obtain the best available rate. Although lodging rates vary greatly from city to city, every effort should be made to find the best available rates for your destination. Approved hotels should fall into the mid-grade quality hotels. Examples include Holiday Inn, Holiday Inn Express, Residence Inn, Fairfield Inn, Red Roof Inn, and LaQuinta.

In the event a group is booking a hotel stay for meetings or trade shows, mid-grade quality hotels will be selected. Employees who prefer to stay in their hotel of choice rather than with the group will be responsible for reimbursing the company the difference in rates.

Hotels should be reserved directly with the hotel reservation system or through one of the on-line reservation services such as Expedia.com, Orbitz.com, Hotels.com or Priceline.com. These web sites often have special, unpublished lower rates than can be found elsewhere. However, most of these services require payment upfront at the time of the reservation, which may not be refundable should plans change. Please check the service prior to making the reservation. If your plans might change, do not select the prepayment option. Priceline.com offers significantly lower rates than you can generally find elsewhere. They may also require payment up front at the time of the reservation, which is not refundable if plans change, so please take that into consideration if your plans might change. When reserving through Priceline.com, choose the 2.5- or 3-star hotel level.

**NOTE:** As a supplier for the government, Advantus employees are eligible for the Government hotel rate. When making a reservation directly with the hotel or through one of the on-line reservation services, please request the Government rate. This rate should be compared to the other rates available, and the reservation made at the lowest possible rate.

When traveling with another Advantus employee of the same sex, hotel rooms should be shared to reduce expenses. Employees are not, however, required to share a room with their immediate supervisor. This includes normal travel as well as travel to tradeshows.

Hotel rates greater than $150/night must be pre-approved by your immediate supervisor/manager.

**Meals and Incidental Expenses**

Advantus Corp. will supply individuals traveling for business purposes (other locations, Trade Shows, Consumer Shows) a meal per diem. This daily rate will be in accordance with government guidelines for the city of the event. The per diem rate includes breakfast, lunch, and dinner.

As a guideline, the IRS has established a federal per diem rate for meals and incidental expenses (M&IE). These rates range from a low of $51 per day to a high of $74 per day, depending on the city. For example, Orlando has a federal per diem rate of $59 per day. Chicago has a federal per diem rate of $74 per day. Federal per diem rates can be found at <http://www.gsa.gov/portal/category/21287>.

Everyone is responsible for maintaining their meal expenses within the allowance they are given. Any amount spent above the allowance will be considered a personal expense and will not be reimbursed. Conversely, it is not necessary to submit receipts or return any remaining funds. These dollars have already been allotted to the travel budget accordingly.

In order to receive the per diem payment, requests must be submitted at least 7 days prior to the travel date. <http://wiki.advantus.com/accounting/accounts-payable/ap-payment-request/>

Managers are responsible for requesting the per diem for members of their staff who are traveling for business purposes.

Meals are often shared with employees who have company credit cards. It is the responsibility of the employee who received the per diem to request a separate check and pay for their meal using the per diem provided.

If a group meal is scheduled during tradeshow, conference, or consumer shows, the manager is responsible for reducing the per diem request to account for the company paid meal.

Director-level and above employees will not be given a per diem for travel and are reimbursed at the actual cost of the meal, including tip (at the recommended rate of 15%). Company credit cards should be used where possible. If the corporate card is not accepted, other methods such as cash or personal credit card can be used and expenses submitted to the company for reimbursement. Receipts must be obtained and submitted for all meals and incidents, including receipts for expenses on the company credit card.

**Expense Reporting and Reimbursement**

In general, travel expenses are reimbursed for reasonable and practical expenses incurred while traveling on company business. All expenses incurred while traveling on company business must be documented and reported using the Concur system if the employee is an AMEX card holder. Out of pocket expenses incurred (non-AMEX charges) must be submitted for reimbursement using the Travel Expense Report located under Shared Documents - Accounting on the Wiki.

<http://wiki.advantus.com/accounting/accounts-payable/expense-report/>

**Non-Exempt Employee Travel**

When a non-exempt (hourly) employee is required to travel for Advantus business, the following guidelines apply in determining whether the time is hours worked. Employees must report their hours to the Department Manager upon return from travel.

**COMPENSABLE**

* Non-exempt employees will be paid for one hour prior to the departure time of the flight.
* Travel on non-workdays (like weekends) also counts as hours worked, i.e., time spent on an airplane would be considered hours worked.
* If an employee is required to attend meals, social events, etc., that time is counted as hours worked. The determining factor is whether you are REQUIRED to attend the event or if it is at your discretion.

**NON-COMPENSABLE**

* Regular meal periods do not count as hours worked.
* Time spent sleeping does not count as hours worked.
* Travel between home and work or between hotel and worksite is considered normal commuting time and does not count as hours worked.

**MISCELLANEOUS ISSUES**

* The employee is not compensated for time not working even if it occurs within the employee’s regular work schedule (e.g., employee goes sightseeing instead of attending a session of the conference or the conference sessions are only from 9 – 4).

Advantus Corp. pays overtime to all Non-Exempt (hourly) employees for time worked in excess of 40 hours per week. The workweek begins at 12:00 am on Monday and ends at 11:59 pm the following Sunday. PTO is not considered time worked and is not included when calculating hours worked for overtime pay.

**02.12.2020**

**Corporate Credit Cards**

Regular, full-time employees may apply for a corporate credit card but must obtain prior, written approval from their supervisor. To be eligible for a corporate credit card, an employee must travel frequently in the course of his/her duties; purchase significant volumes of goods and services for use by the employer; or incur other regular frequent business expenses of a kind appropriately paid by credit card.

The corporate credit card cannot be used to obtain cash advances, bank checks, traveler’s checks, or electronic cash transfers for expenses other than those incurred by the assigned employee named on the card. Corporate cards cannot be used for personal expenses. Misuse of the card will result in cancellation of the card and withdrawal of corporate credit card privileges. If the card is inadvertently used for an employee’s personal expense, Advantus reserves the right to recover these monies from the employee cardholder. Cardholders will be required to sign a declaration authorizing the company to recover, from their salary, any amount incorrectly claimed.

Corporate credit card expenditures must be reconciled and submitted with original receipts within 10 business days of the statement date. Cardholders who have not reconciled and submitted their monthly expenditures within this period will be asked to do so immediately. Continued or repeated non-conformance to this policy will result in cancellation of the card and other such actions as appropriate. If the card expenditures are not reconciled and submitted within a month of the statement date or a plausible explanation has not been received by the Accounting Department, the employee’s credit card will be cancelled.

**Lost or stolen cards must be reported immediately to Colleen Shrader or her designate.**

**05.29.2019**

**Employee Purchase Program**

Advantus provides an employee discount purchase program as an additional benefit to employees. This program is intended for an employee’s personal use only. Merchandise may not be purchased for resale or on behalf of anyone not employed by Advantus. Purchases in violation of this policy will result in the loss of this benefit and possible disciplinary action.

The employee discount is 50% off regular retail price, then an additional 20% off, except for See Jane Work, Wyla, Mercury, Seward, and Floating Luxuries. The discount for See Jane Work, Wyla, Mercury, Seward, and Floating Luxuries is 50% off the regular retail price with no additional discount.

The Holiday discount program begins November 1st and ends December 31st each year.  During this period the employee discount is 50% off regular retail, then an additional 50% off.  Food products, See Jane Work, Wyla, Mercury, Seward, and Floating Luxuries products are not eligible for the additional 50% discount.

The minimum purchase amount for employee purchases is $20.00, and purchases can be made by credit/debit card only.

**PTO Sharing Program**

If you are aware of a fellow employee that will be out of work for an extended period and who may benefit from shared PTO, submit the request in writing to HR describing the situation and requesting PTO assistance for the individual.

* HR will review the request with the company President and/or COO.
* If approved, a general announcement will be made asking for donations.
* The donated PTO time will be put into the employee’s bank and paid out via bi-weekly pay periods.

**Guidelines:**

* The individual receiving PTO donations is required to use their personal PTO available prior to using donations.
* PTO cannot to be donated to someone who has an attendance problem or simply wants some time off. It must be a bona fide, qualified, and approved hardship reason.
* The receiving employee must have had a good attendance record in order to qualify.
* Approval for donated PTO is at the discretion of the President and/or COO.
* The individual must have a minimum of 3 months of employment with the company to qualify.
* In the event there is unused PTO in the employee’s bank when they return to work, it will be removed from their bank, and placed in an Advantus bank. The balance will be reserved for a future employee need. Donated time will not be returned to the employee who donated.
* Under HIPAA law, Advantus is unable to disclose the reasons for extended leave.

**Employment Termination**

Termination of employment is an inevitable part of personnel activity within any organization, and many of the reasons for termination are routine. Below are examples of some of the most common circumstances under which employment is terminated:

* + Resignation - voluntary employment termination initiated by an employee.
  + Discharge - involuntary employment termination initiated by the organization.
  + Layoff - involuntary employment termination initiated by the organization for non-disciplinary reasons.
  + Retirement - voluntary employment termination initiated by the employee meeting age, length of service, and any other criteria for retirement from the organization.

Advantus requests the following:

1. At least 2 weeks’ written notice of resignation for staff level employees

2. 3 weeks' written notice of resignation for supervisor level employees

3. 4 weeks' written notice of resignation for managers and director level employees

4. 12 weeks' written notice of resignation for executive employees

Advantus will generally schedule exit interviews at the time of employment termination. The exit interview will afford an opportunity to discuss such issues as employee benefits, conversion privileges, repayment of outstanding debts to Advantus, or return of Advantus-owned property. Suggestions, complaints, and questions can also be voiced.

The employee will be notified in writing of the benefits that may be continued through COBRA and of the terms, conditions, and limitations of such continuance. Determination of pay out of accrued, earned PTO will be on a case-by-case basis and at the sole discretion of Advantus; however, a departing employee will not be eligible for PTO payout consideration unless the employee gives the advance notice requested above corresponding to their employment level. Advantus will comply with applicable federal and state law in administering this and other policies.

**Return of Property**

Employees are responsible for items issued to them by Advantus or in their possession or control, such as the following:

\* Credit cards

\* Equipment

\* Keys

\* Access Cards

\* Cell Phones

All Advantus property must be returned by employees on or before their last day of work. Where permitted by applicable laws, Advantus may withhold from the employee's check or final paycheck the cost of any items that are not returned when required. Advantus may also take all action deemed appropriate to recover or protect its property.