

# ORE Financial Services Employee Handbook



2020

## **HANDBOOK DISCLAIMER**

We prepared this handbook to help employees find the answers to many questions that they may have regarding their employment with ORE Financial Services. Please take the necessary time to read it.

We do not expect this handbook to answer all questions. Supervisors and Human Resources also serve as a major source of information.

Neither this handbook nor any other verbal or written communication by a management representative is, nor should it be considered to be, an agreement, contract of employment, express or implied, or a promise of treatment in any particular manner in any given situation, nor does it confer any contractual rights whatsoever. ORE Financial Services adheres to the policy of employment at will, which permits the Company or the employee to end the employment relationship at any time, for any reason, with or without cause or notice.

No Company representative other than Managing Member may modify at-will status and/or provide any special arrangement concerning terms or conditions of employment in an individual case or generally and any such modification must be in a signed writing.

ORE Financial Services, LLC is referred to in this handbook as; 1) ORE Financial Services and 2) The Company.

Many matters covered by this handbook, such as benefit plan descriptions, are also described in separate Company documents. These Company documents are always controlling over any statement made in this handbook or by any member of management.

This handbook states only general Company guidelines. We may, at any time, in our sole discretion, modify or vary from anything stated in this handbook, at which time an amendment will be distributed.

This handbook supersedes all prior handbooks.

# Table of Contents

---

Section 1 - Governing Principles of Employment.....	5
1-1 Introduction .....	5
1-2 Equal Employment Opportunity.....	5
1-3 Non-Harassment .....	6
1-4 Sexual Harassment .....	6
1-5 Drug-Free Workplace.....	7
1-6 Weapon-Free Workplace .....	8
1-7 Workplace Violence .....	8
1- 8 Dispute Resolution .....	9
Section 2 - Operational Policies.....	11
2-1 Employee Classifications.....	11
2-2 Trial Period.....	11
2-3 Your Employment Records .....	11
2-4 Working Hours and Schedule.....	12
2-5 Timekeeping Procedures .....	12
2-6 Overtime .....	12
2-7 Travel Time for Non-Exempt Employees .....	13
2-8 Safe Harbor Policy for Exempt Employees.....	13
2-9 Your Paycheck.....	15
2-10 Direct Deposit .....	15
2-11 Performance Review .....	15
2-12 Job Postings.....	15
2-13 Inclement Weather Policy.....	16
Section 3 - Benefits.....	17
3-1 Benefits Overview/Disclaimer .....	17
3-2 Paid Holidays .....	17
3-3 Paid Vacations .....	18
3-4 Sick Days.....	19
3-5 Lactation Breaks.....	19
3-6 Workers' Compensation.....	20
3-7 Jury Duty .....	20
3-8 Bereavement Leave.....	20
3-9 Voting Leave.....	20
3-10 Insurance Programs .....	21
3-11 Retirement Plan - 401K.....	21
Section 4 - Leaves of Absence .....	22
4-1 Personal Leave .....	22
4-2 Military Leave.....	22
4-3 Maternity and Parental Leave.....	23
Section 5 - General Standards of Conduct.....	24

5-1 Workplace Conduct.....	24
5-2 Punctuality and Attendance.....	25
5-3 Use of Communications and Computer Systems.....	25
5-4 Use of Social Media.....	26
5-5 Personal and Company-Provided Portable Communication Devices.....	27
5-6 Inspections.....	28
5-7 Smoking.....	28
5-8 Team Portal .....	29
5-9 Confidential Company Information.....	29
5-10 Conflict of Interest and Business Ethics.....	29
5-11 Use of Facilities, Equipment and Property, Including Intellectual Property .....	30
5-12 Health and Safety.....	30
5-13 Employee Dress and Personal Appearance.....	31
5-14 Publicity/Statements to the Media .....	31
5-15 Operation of Vehicles.....	31
5-16 Business Expense Reimbursement.....	32
5-17 References.....	32
5-18 If You Must Leave Us.....	32
5-19 Exit Interviews.....	33
5-20 A Few Closing Words.....	33
General Handbook Acknowledgment.....	34
Receipt of Sexual Harassment Policy.....	35
Receipt of Non-Harassment Policy .....	36

# Section 1 - Governing Principles of Employment

## 1-1 Introduction

For employees who are commencing employment with ORE Financial Services, on behalf of ORE Financial Services, let me extend a warm and sincere welcome.

For employees who have been with us, thank you for your past and continued service.

I extend my personal best wishes for success and happiness here at ORE Financial Services. We understand that it is our employees who provide the services that our customers rely upon, and who will enable us to create new opportunities in the years to come.

Brittany Thompson, Managing Member

## 1-2 Equal Employment Opportunity

ORE Financial Services is an Equal Opportunity Employer that does not discriminate on the basis of actual or perceived race, creed, color, religion, alienage or national origin, ancestry, citizenship status, age, disability or handicap, sex, marital status, veteran status, sexual orientation, genetic information, or any other characteristic protected by applicable federal, state or local laws. Our management team is dedicated to this policy with respect to recruitment, hiring, placement, promotion, transfer, training, compensation, benefits, employee activities and general treatment during employment.

***Accommodations for Individuals with Disabilities:*** The Company will make reasonable accommodations, as required by law, for the known physical or mental disabilities of an otherwise qualified applicant or employee, unless doing so would impose an undue hardship upon the Company's business operations. An accommodation is not reasonable if, even with the accommodation, the employee is unable to perform essential job duties in a manner that would not endanger the health or safety of the employee or others.

Any applicant or employee who believes they require an accommodation in order to perform the essential functions of the job should contact the Head of Human Resources to request such an accommodation. Employees should specify what accommodation they need to perform the job and submit supporting medical documentation explaining the underlying physical or mental disability and the basis for the requested accommodation. The Company then will review and analyze the request, including engaging in an interactive process with the employee or applicant, to identify if such an accommodation can be made. The Company will evaluate requested accommodations, and as appropriate identify other possible accommodations, if any. The employee will be notified of the Company's decision regarding the request within a reasonable period. The Company treats all medical information submitted as part of the accommodation process in a confidential manner.

The Company will endeavor to accommodate the sincere religious beliefs of its employees to the extent such accommodation does not pose an undue hardship on the Company's operations. If employees wish to request such an accommodation, they should contact the Head of Human Resources.

Any employees with questions or concerns about equal employment opportunities in the workplace are encouraged to bring these issues to the attention of the Head of Human Resources. The Company will not allow any form of retaliation against individuals who raise issues of equal employment opportunity. If employees feel they have been subjected to any such retaliation, they should contact the Head of Human Resources. To ensure the workplace is free of artificial barriers, violation of this policy including any improper retaliatory conduct will lead to discipline, up to and including discharge. All employees must cooperate with all investigations.

### **1-3 Non-Harassment**

It is ORE Financial Services' policy to prohibit intentional and unintentional harassment of any individual by another person on the basis of any protected classification including, but not limited to, race, color, national origin, disability, religion, marital status, veteran status, sexual orientation or age. The purpose of this policy is not to regulate our employees' personal morality, but to ensure that in the workplace, no one harasses another individual.

If the employee feels that they have been subjected to conduct which violates this policy, they should immediately report the matter to any member of management. If the employee is unable for any reason to contact this person, or if the employee has not received a satisfactory response within five (5) business days after reporting any incident of perceived harassment, the employee should contact the Head of Human Resources. If the person toward whom the complaint is directed is one of the individuals indicated above, the employee should contact any higher-level manager in their reporting hierarchy. Every report of perceived harassment will be fully investigated and corrective action will be taken where appropriate. All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed. In addition, the Company will not allow any form of retaliation against individuals who report unwelcome conduct to management or who cooperate in the investigations of such reports in accordance with this policy. If the employee feels they have been subjected to any such retaliation, they should report it in the same manner in which the employee would report a claim of perceived harassment under this policy. Violation of this policy including any improper retaliatory conduct will result in disciplinary action, up to and including discharge. All employees must cooperate with all investigations.

### **1-4 Sexual Harassment**

It is ORE Financial Services' policy to prohibit harassment of any employee by any supervisor, employee, customer or vendor on the basis of sex or gender. The purpose of this policy is not to regulate personal morality within the Company. It is to ensure that all employees are free from sexual harassment in the workplace or while attending work related functions. While it is not easy to define precisely what types of conduct could constitute sexual harassment, examples of

prohibited behavior include unwelcome sexual advances, requests for sexual favors, obscene gestures, displaying sexually graphic magazines, calendars or posters, sending sexually explicit e-mails, text messages and other verbal or physical conduct of a sexual nature, such as uninvited touching of a sexual nature or sexually related comments. Depending upon the circumstances, improper conduct also can include sexual joking, vulgar or offensive conversation or jokes, commenting about the employee's physical appearance, conversation about one's own or someone else's sex life, or teasing or other conduct directed toward a person because of their gender which is sufficiently severe or pervasive to create an unprofessional and hostile working environment.

If the employee feels they have been subjected to conduct which violates this policy, they should immediately report the matter to any member of management. If unable for any reason to contact this person, or if the employee has not received a satisfactory response within five (5) business days after reporting any incident of perceived harassment, the employee should contact the Head of Human Resources. If the person toward whom the complaint is directed is one of the individuals indicated above, the employee should contact any higher-level manager in their reporting hierarchy. Every report of perceived harassment will be fully investigated and corrective action will be taken where appropriate. All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed. In addition, the Company will not allow any form of retaliation against individuals who report unwelcome conduct to management or who cooperate in the investigations of such reports in accordance with this policy. If the employees feel they have been subjected to any such retaliation, they should report it in the same manner in which a claim of perceived harassment would be reported under this policy. Violation of this policy including any improper retaliatory conduct will result in disciplinary action, up to and including discharge. All employees must cooperate with all investigations.

## **1-5 Drug-Free Workplace**

To help ensure a safe, healthy and productive work environment for employees and others, to protect Company property, and to ensure efficient operations, ORE Financial Services has adopted a policy of maintaining a workplace free of drugs. This policy applies to all employees and other individuals who perform work for the Company.

The unlawful or unauthorized use, abuse, solicitation, theft, possession, transfer, purchase, sale or distribution of controlled substances, drug paraphernalia by an individual anywhere on Company premises, while on Company business (whether or not on Company premises) or while representing the Company, is strictly prohibited. Employees and other individuals who work for the Company also are prohibited from reporting to work or working while they are using or under the influence of alcohol or any controlled substances, which may impact the employee's ability to perform their job or otherwise pose safety concerns, except when the use is pursuant to a licensed medical practitioner's instructions and the licensed medical practitioner authorized the employee or individual to report to work.

Employees must notify the Company's Managing Member or Head of Human Resources of any conviction for drug-related offenses committed in the workplace or outside the workplace immediately.

Any employee who violates this Company policy shall be subject to disciplinary action up to and including termination of employment.

## **1-6 Weapon-Free Workplace**

To ensure that ORE Financial Services maintains a workplace safe and free of violence for all employees, the company prohibits the possession or use of dangerous weapons on company property.

All ORE Financial Services workers are subject to this provision, including contract workers and temporary employees as well as visitors and customers on company property. A license to carry the weapon on company property does not supersede company policy. Any employee in violation of this policy will be subject to disciplinary action, up to and including termination.

“Company property” is defined as all company-owned or leased buildings and surrounding areas such as sidewalks, walkways, driveways and parking lots under the company’s ownership or control. This policy applies to all company-owned or leased vehicles and all vehicles that come onto company property.

“Dangerous weapons” include firearms, explosives, knives and other weapons that might be considered dangerous or that could cause harm. Employees are responsible for making sure that any item possessed by the employee is not prohibited by this policy.

ORE Financial Services reserves the right at any time and at its discretion to search all company-owned or leased vehicles and all vehicles, plus packages, containers, briefcases, purses, lockers, desks, enclosures and persons entering its property, for the purpose of determining whether any weapon is being, or has been, brought onto its property or premises in violation of this policy. Employees who fail or refuse to promptly permit a search under this policy will be subject to discipline up to and including termination.

This policy is administered and enforced by the human resource (HR) department. Anyone with questions or concerns specific to this policy should contact the HR department.

## **1-7 Workplace Violence**

ORE Financial Services is strongly committed to providing a safe workplace. The purpose of this policy is to minimize the risk of personal injury to employees and damage to Company and personal property.

ORE Financial Services does not expect employees to become experts in psychology or to physically subdue a threatening or violent individual. Indeed, ORE Financial Services specifically discourages employees from engaging in any physical confrontation with a violent or potentially



violent individual. However, ORE Financial Services does expect and encourages employees to exercise reasonable judgment in identifying potentially dangerous situations.

Experts in the mental health profession state that prior to engaging in acts of violence, troubled individuals often exhibit one or more of the following behaviors or signs: over-resentment, anger and hostility; extreme agitation; making ominous threats such as bad things will happen to a particular person, or a catastrophic event will occur; sudden and significant decline in work performance; irresponsible, irrational, intimidating, aggressive or otherwise inappropriate behavior; reacting to questions with an antagonistic or overtly negative attitude; discussing weapons and their use, and/or brandishing weapons in the workplace; overreacting or reacting harshly to changes in Company policies and procedures; personality conflicts with co-workers; obsession or preoccupation with a co-worker or supervisor; attempts to sabotage the work or property of a co-worker; blaming others for mistakes and circumstances; or demonstrating a propensity to behave and react irrationally.

### **Prohibited Conduct**

Threats, threatening language or any other acts of aggression or violence made toward or by any Company employee WILL NOT BE TOLERATED. For purposes of this policy, a threat includes any verbal or physical harassment or abuse, any attempt at intimidating or instilling fear in others, menacing gestures, flashing of weapons, stalking or any other hostile, aggressive, injurious or destructive action undertaken for the purpose of domination or intimidation.

### **Procedures for Reporting a Threat**

All potentially dangerous situations, including threats by co-workers, should be reported immediately to any member of management with whom the employee feels comfortable. Reports of threats may be maintained confidential to the extent maintaining confidentiality does not impede ORE Financial Services' ability to investigate and respond to the complaints. All threats will be promptly investigated. All employees must cooperate with all investigations. No employee will be subjected to retaliation, intimidation or disciplinary action as a result of reporting a threat in good faith under this policy.

If the Company determines, after an appropriate good faith investigation, that someone has violated this policy, the Company will take swift and appropriate corrective action.

If the employee is the recipient of a threat made by an outside party, that employee should follow the steps detailed in this section. It is important for the Company to be aware of any potential danger in its offices. Indeed, the Company wants to take effective measures to protect everyone from the threat of a violent act by employees or by anyone else.

## **1- 8 Dispute Resolution**

Any dispute regarding employment will be resolved by binding arbitration with the American Arbitration Association ("AAA") pursuant to the AAA employment arbitration rules. Interpretation and enforcement of this agreement will be based on the laws of the state in which

it is executed by you. The venue for arbitration will be Houston, Texas. Each party shall bear the cost of their own representation in arbitration including filing costs, cost of arbitrator, and any other AAA fees associated with a civil complaint in Houston, Texas.

## Section 2 - Operational Policies

### 2-1 Employee Classifications

For purposes of this handbook, all ORE Financial Services employees fall within one of the classifications below.

**Full-Time Employees** - Employees who regularly work at least 40 hours per week who were not hired on a short-term basis.

**Part-Time Employees** - Employees who regularly work fewer than 40 hours per week who were not hired on a short-term basis.

**Short-Term Employees** - Employees who were hired for a specific short-term project, or on a short-term freelance, per diem or temporary basis. Short-Term employees generally are not eligible for Company benefits, but are eligible to receive statutory benefits.

In addition to the above classifications, employees are categorized as either "**exempt**" or "**non-exempt**" for purposes of federal and state wage and hour laws. Employees classified as exempt do not receive overtime pay; they generally receive the same weekly salary regardless of hours worked. Such salary may be paid less frequently than weekly. The employee will be informed of these classifications upon hire and informed of any subsequent changes to the classifications.

### 2-2 Trial Period

**The first three months** of an employees' employment is the introductory period. This is an opportunity for ORE Financial Services to evaluate the employee's performance. It also is an opportunity for employees to decide whether they are happy being employed by the Company. The Company may extend the introductory period if it desires. Completion of the introductory period does not alter the employee's at-will status.

### 2-3 Your Employment Records

In order to obtain their position, employees have provided personal information, such as address and telephone number. This information is contained in their personnel file.

Employees should keep their personnel file up to date by informing the Head of Human Resources of any changes. Employees also should inform the Head of Human Resources of any specialized training or skills they acquire, as well as any changes to any required visas. Unreported changes of address, marital status, etc. can affect withholding tax and benefit coverage. Further, an "out of date" emergency contact or an inability to reach employees in a crisis could cause a severe health or safety risk or other significant problems.

## **2-4 Working Hours and Schedule**

Our core business hours are from 8:30 a.m. to 5:30 p.m. ORE Financial Services recognizes that many employees need flexibility in work schedules. To the extent flexible work schedules do not interfere with business operations, we have adopted flex-hours with the acknowledgment that all employees must arrive between 7:30 a.m. and 9:00 a.m. and work a full shift (i.e., 7:30 a.m. - 4:30 p.m.)

Employees are free to set their own work hours within these limits with approval from their Manager. In addition, if there is a need for remote work, employees should get advanced approval from their Manager.

## **2-5 Timekeeping Procedures**

Employees must record their actual time worked for payroll and benefit purposes. Non-exempt employees must record the time work begins and ends, as well as the beginning and ending time of any departure from work for any non-work-related reason, on forms as prescribed by management.

Altering, falsifying or tampering with time records is prohibited and subjects the employee to discipline, up to and including discharge.

Exempt employees are required to record their daily work attendance and report full days of absence from work for reasons such as leaves of absence, sick leave or personal business.

It is the employee's responsibility to sign time records to certify the accuracy of all time recorded. Any errors in the time record should be reported immediately to a supervisor, who will attempt to correct legitimate errors.

## **2-6 Overtime**

Like most successful companies, ORE Financial Services experiences periods of extremely high activity. During these busy periods, additional work is required from all of us. Supervisors are responsible for monitoring business activity and requesting overtime work if it is necessary. Effort will be made to provide employees with adequate advance notice in such situations.

Any non-exempt employee who works overtime will be compensated at the rate of one and one-half times (1.5) their normal hourly wage for all time worked in excess of 40 hours each week, unless otherwise required by law.

Employees may work overtime only with prior management authorization.

For purposes of calculating overtime for non-exempt employees, the workweek begins at 12 a.m. on Sunday and ends 168 hours later at 12 a.m. on the following Sunday.

## **2-7 Travel Time for Non-Exempt Employees**

### **Overnight, Out-of-Town Trips**

Non-exempt employees will be compensated for time spent traveling (except for meal periods) during their normal working hours, on days they are scheduled to work and on unscheduled work days (such as weekends). Non-exempt employees also will be paid for any time spent performing job duties during otherwise non-compensable travel time; however, such work should be limited absent advance management authorization.

### **Out-of-Town Trips for One Day**

Non-exempt employees who travel out of town for a one-day assignment will be paid for all travel time, except for, among other things: time spent traveling between the employee's home and the local railroad, bus or plane terminal; and meal periods.

### **Local Travel**

Non-exempt employees will be compensated for the time spent traveling from one job site to another job site during a workday. The trip home, however, is non-compensable when the employee goes directly home from the final job site, unless it is much longer than the regular commute home from the regular worksite. In such a case, the portion of the trip home in excess of the regular commute is compensable.

### **Commuting Time**

Under the Portal to Portal Act, travel from home to work and from work to home is generally non-compensable. However, if a non-exempt employee regularly reports to a worksite near their home, but is required to report to a worksite farther away than the regular worksite, the additional time spent traveling is compensable.

If compensable travel time results in more than 40 hours worked by a non-exempt employee, the employee will be compensated at an overtime rate of one and one-half (1.5) times the regular rate.

To the extent that applicable state law provides greater benefits, state law applies.

## **2-8 Safe Harbor Policy for Exempt Employees**

It is ORE Financial Services' policy and practice to accurately compensate employees and to do so in compliance with all applicable state and federal laws. To ensure proper payment and that no improper deductions are made, employees must review pay stubs promptly to identify and report all errors.

Those classified as exempt salaried employees will receive a salary which is intended to compensate them for all hours they may work for ORE Financial Services. This salary will be

established at the time of hire or classification as an exempt employee. While it may be subject to review and modification from time to time, such as during salary review times, the salary will be a predetermined amount that will not be subject to deductions for variations in the quantity or quality of the work performed.

Under federal and state law, salary is subject to certain deductions. For example, unless state law requires otherwise, salary can be reduced for the following reasons:

- full-day absences for personal reasons;
- full-day absences for sickness or disability if the deduction is made in accordance with a bona fide plan, policy or practice of providing wage replacement benefits for such absences (deductions also may be made for the exempt employee's full-day absences due to sickness or disability before the employee has qualified for the plan, policy or practice or after the employee has exhausted the leave allowance under the plan);
- full-day disciplinary suspensions for infractions of our written policies and procedures;
- Family and Medical Leave Act absences (either full- or partial-day absences);
- to offset amounts received as payment from the court for jury and witness fees or from the military as military pay;
- the first or last week of employment in the event the employee works less than a full week; and
- any full work week in which the employee does not perform any work.

Salary may also be reduced for certain types of deductions such as a portion of health, dental or life insurance premiums; state, federal or local taxes; social security; or voluntary contributions to a 401(k) or pension plan.

In any work week in which the employee performed any work, salary will not be reduced for any of the following reasons:

- partial day absences for personal reasons, sickness or disability;
- an absence because the Company has decided to close a facility on a scheduled workday;
- absences for jury duty, attendance as a witness, or military leave in any week in which the employee performed any work (subject to any offsets as set forth above); and
- any other deductions prohibited by state or federal law.

However, unless state law provides otherwise, deductions may be made to accrued leave for full- or partial-day absences for personal reasons, sickness or disability.

If the employee believes they have been subject to any improper deductions, they should immediately report the matter to a supervisor. If the supervisor is unavailable or if the employee believes it would be inappropriate to contact that person (or if the employee has not received a prompt and fully acceptable reply), they should immediately contact the Head of Human Resources or any other supervisor in ORE Financial Services with whom the employee feels comfortable.

## **2-9 Your Paycheck**

Employees will be paid semi-monthly for all the time worked during the past pay period.

Payroll stubs itemize deductions made from gross earnings. By law, ORE Financial Services is required to make deductions for Social Security, federal income tax and any other appropriate taxes. These required deductions also may include any court-ordered garnishments. Payroll stubs also will differentiate between regular pay received and overtime pay received.

If there is an error in any employee's pay, the employee should bring the matter to the attention of the Head of Human Resources and/or their Supervisor immediately so the Company can resolve the matter quickly and amicably.

Paychecks will be given only to the employee, unless the employee requests that it be mailed or authorizes in writing that another person may accept the check.

## **2-10 Direct Deposit**

ORE Financial Services encourages employees to use the benefit of direct deposit. Authorization forms are available from the Accounting or Human Resource Departments.

## **2-11 Performance Review**

Depending on the employee's position and classification, ORE Financial Services endeavors to review performance quarterly. However, a positive performance evaluation does not guarantee an increase in salary, a promotion or continued employment. Compensation increases and the terms and conditions of employment, including job assignments, transfers, promotions, and demotions, are determined by and at the discretion of management.

In addition to these formal performance evaluations, the Company encourages employees and supervisors to discuss job performance on a frequent and ongoing basis.

## **2-12 Job Postings**

ORE Financial Services is dedicated to assisting employees in managing their careers and reaching their professional goals through promotion and transfer opportunities. This policy outlines the online job posting program which is in place for all employees. To be eligible to apply for an open position, employees must meet the following requirements:

- be a current, regular, full-time or part-time employee;
- have been in current position for at least six (6) months;
- maintain a performance rating of satisfactory or above;
- not be on conduct/performance-related probation or warning;

- meet the job qualifications listed on the job posting; and
- provide their current manager with notice prior to applying for the position.

If employees find a position of interest on the job posting website and meet the eligibility requirements, an online job posting application must be completed in order to be considered for the position. Not all positions are guaranteed to be posted. The Company reserves the right to seek applicants in confidence solely from outside sources or to openly post positions internally and externally simultaneously.

For more specific information about the program, please contact the Human Resources Department.

## **2-13 Inclement Weather Policy**

The safety of employees is a priority for ORE Financial Services. The Company realize there are emergency situations caused by inclement weather and this policy outlines how the Company will handle pay and notification of employees.

When an emergency situation occurs where the Company is closed, all full-time exempt and non-exempt employees will receive pay for up to one week during the closure. After that time, employees are eligible to use paid time off to cover lost wages. No overtime will be paid during this time. Employees will continue to receive health benefits and any other benefit that does not require a physical presence for eligibility.

Should inclement weather occur during the work day, the Company leadership will make the determination regarding what time the business will close. All employees will be paid for their scheduled hours for the remainder of the day.

During all business closures, any employee who can work remotely is required to do so.

Upon determination that the Company will be closed due to an emergency situation, all efforts will be made to notify employees properly. Examples of communication include: an outgoing message on the company's Bamboo HR Announcement page and Team Portal will be changed to reflect the closure, the company website will reflect the closure and each team leader will be expected to notify their team members.

Upon the company reopening all employees are expected to return to work. For any employee who needs more time to tend to repairs or damage beyond the norm, our normal leave of absence policies will apply. In these cases, employees should stay in close communication with their manager to ensure the time off is considered properly.



## Section 3 - Benefits

### 3-1 Benefits Overview/Disclaimer

In addition to good working conditions and competitive pay, it is ORE Financial Services' policy to provide a combination of supplemental benefits to all eligible employees. In keeping with this goal, each benefit program has been carefully devised. These benefits include time-off benefits, such as vacations and holidays, and insurance and other plan benefits. ORE Financial Services is constantly studying and evaluating its benefits programs and policies to better meet present and future requirements. These policies have been developed over the years and continue to be refined to keep up with changing times and needs.

The next few pages contain a brief outline of the benefits programs ORE Financial Services provides employees and their families. Of course, the information presented here is intended to serve only as guidelines.

The descriptions of the insurance and other plan benefits merely highlight certain aspects of the applicable plans for general information only. The details of those plans are spelled out in the official plan documents, which are available for review upon request from the Head of Human Resources. Additionally, the provisions of the plans, including eligibility and benefits provisions, are summarized in the summary plan descriptions ("SPDs") for the plans (which may be revised from time to time). In the determination of benefits and all other matters under each plan, the terms of the official plan documents shall govern over the language of any descriptions of the plans, including the SPDs and this handbook.

Further, ORE Financial Services (including its members, officers and administrators who are responsible for administering the plans) retains full discretionary authority to interpret the terms of the plans, as well as full discretionary authority with regard to administrative matters arising in connection with the plans and all issues concerning benefit terms, eligibility and entitlement.

While the Company intends to maintain these employee benefits, it reserves the absolute right to modify, amend or terminate these benefits at any time and for any reason.

If employees have any questions regarding benefits, they should contact the Head of Human Resources.

### 3-2 Paid Holidays

Full-time employees will be paid for 12 holidays annually. Please refer to BambooHR as these holidays may change:

<b>Holiday</b>	<b>Date</b>
New Year's Eve	January 1st
Martin Luther King Day	January 21st
President's Day	February 18th

Memorial Day	May 27th
4th of July	July 4th
Day after 4th of July	July 5th
Labor Day	September 2nd
Thanksgiving Day	November 28th
Day after Thanksgiving Day	November 29th
Christmas Eve	December 24th
Christmas Day	December 25th
New Years Eve	December 31st

When holidays fall or are celebrated on a regular work day, eligible employees will receive one (1) day's pay at their regular straight-time rate. Eligible employees who are called into work on a holiday will receive one (1) day's pay at their regular straight-time rate, and an additional payment of straight-time for the actual time they work that day.

If a holiday falls within an eligible employee's approved vacation period, the eligible employee will be paid for the holiday (at the regular straight-time rate) in addition to the vacation day, or the eligible employee will receive an additional vacation day at the option of the Company.

If a holiday falls within a jury duty or bereavement leave, the eligible employee will be paid for the holiday (at the regular straight-time rate) in addition to the leave day, or the eligible employee will receive an additional day off at the option of the Company.

### **3-3 Paid Vacations**

ORE Financial Services appreciates how hard employees work and recognizes the importance of providing time for rest and relaxation. ORE Financial Services fully encourages employees to get this rest by taking vacation time. Full-time employees accrue paid vacation time as follows:

During the first partial calendar year of employment and the first five (5) full calendar years of employment, full-time employees accrue up to ten (10) days of vacation per year. Vacation time is accrued at 6.67 hours per month.

Thereafter, full-time employees accrue up to fifteen (15) days of vacation per year. Vacation is accrued on a pro-rata basis throughout the year.

The maximum vacation entitlement for part-time employees is pro-rated based on hours worked.

Vacations should be taken during the year accrued, unless otherwise required by law. Accrued, unused vacation time can be carried over to the following calendar year only if approved by the Head of Human Resources.

Every effort will be made to grant employees' vacation preference, consistent with operating schedules. However, if too many people request the same period of time off, the Company

reserves the right to choose who may take vacation during that period. Employees with the longest length of service generally will be given preference. Vacation requests must be submitted to managers at least two (2) weeks in advance of the requested vacation dates.

Accrued, unused vacation is paid out upon separation. Advanced but un-accrued (unearned) vacation will be deducted from final paychecks to the extent permitted by law.

### **3-4 Sick Days**

Full-time employees are eligible to accrue up to six (6) paid sick days each year, which are accrued on a pro-rata basis throughout the year. If the employees will be out of work due to illness, they must call in and notify their supervisor as early as possible, but at least by the start of the workday. If the employees call in sick for three (3) or more consecutive days, they may be required to provide their supervisor with a doctor's note on the day they return to work.

Sick days must be taken during the year they are accrued.

Sick days must be used in at least half-day increments.

While sick days are intended to cover only the employee's own illnesses, if required by applicable state or local law, sick days may be used to care for a family member's (including civil union partners') illness or for any other reason required by applicable state or local law.

Advanced but unaccrued sick days will be deducted from the final paycheck to the extent permitted by state law.

### **3-5 Lactation Breaks**

ORE Financial Services will provide a reasonable amount of break time to accommodate employees desiring to express breast milk for their infant child, in accordance with and to the extent required by applicable law. The break time, if possible, must run concurrently with rest and meal periods already provided. If the break time cannot run concurrently with rest and meal periods already provided, the break time will be unpaid, subject to applicable law.

The Company will make reasonable efforts to provide employees with the use of a room or location other than a toilet stall to express milk in private. This location may be the employee's private office, if applicable. The Company may not be able to provide additional break time if doing so would seriously disrupt the Company's operations, subject to applicable law. Please consult the Head of Human Resources with questions regarding this policy.

Employees should advise management if they need break time and an area for this purpose. Employees will not be discriminated against or retaliated against for exercising their rights under this policy.

### **3-6 Workers' Compensation**

On-the-job injuries are covered by ORE Financial Services' Workers' Compensation Insurance Policy, which is provided at no cost to the employee. If employees are injured on the job, no matter how slightly, they should report the incident immediately to their supervisor. Failure to follow Company procedures may affect the ability of employees to receive Workers Compensation benefits.

This is solely a monetary benefit and not a leave of absence entitlement. Employees who need to miss work due to a workplace injury must also request a formal leave of absence. See the Leave of Absence sections of this handbook for more information.

### **3-7 Jury Duty**

ORE Financial Services realizes that it is the obligation of all U.S. citizens to serve on a jury when summoned to do so. All employees will be allowed time off to perform such civic service as required by law. Employees are expected, however, to provide proper notice of a request to perform jury duty and verification of their service.

Employees also are expected to keep management informed of the expected length of jury duty service and to report to work for the major portion of the day if excused by the court. If the required absence presents a serious conflict for management, employees may be asked to try to postpone jury duty.

Employees on jury duty leave will be paid for their jury duty service in accordance with state law; however, exempt employees will be paid their full salary for any week in which time is missed due to jury duty if work is performed for the Company during such week.

### **3-8 Bereavement Leave**

The death of a family member is a time when employees may need time off to grieve or to attend to the needs of their family. If employees lose a close relative, they will be allowed paid time off of up to three (3) work days to assist in attending to their obligations and commitments. For the purposes of this policy, a close relative includes a spouse, domestic partner, child, parent, sibling or any other relation required by applicable law. Paid leave days may only be taken on regularly scheduled, consecutive workdays. Employees must inform their supervisor prior to commencing bereavement leave. In administering this policy, ORE Financial Services may require verification of death.

### **3-9 Voting Leave**

In the event employees do not have sufficient time outside of working hours to vote in a statewide election, if required by state law, the employee may take off enough working time to vote. Such time will be paid if required by state law. This time should be taken at the beginning or end of the

regular work schedule. Where possible, supervisors should be notified at least two (2) days prior to the voting day.

### **3-10 Insurance Programs**

Full-time employees may participate in ORE Financial Services' insurance programs. Under these plans, eligible employees will receive comprehensive health and other insurance coverage for themselves and their families, as well as other benefits.

Upon becoming eligible to participate in these plans, employees will receive summary plan descriptions (SPDs) describing the benefits in greater detail. Please refer to the SPDs for detailed plan information. Of course, feel free to contact the Head of Human Resources with any further questions. (Detailed information on SPDs can be found on the ORE Team Portal).

### **3-11 Retirement Plan - 401K**

Eligible employees are able to participate in ORE Financial Services' 401 K Profit Sharing Plan. Plan participants may make pre-tax contributions to a retirement account. Employees are eligible for this plan after completion of 90 days of service. An employee becomes eligible to receive an employer match of up to 3% of their salary following the anniversary of their first full year of employment.

Upon becoming eligible to participate in this plan, employees will receive an SPD describing the plan in greater detail. Please refer to the SPD for detailed plan information. Of course, feel free to speak to the Head of Human Resources or refer to information on the Team Portal, if there are any further questions.

## **Section 4 - Leaves of Absence**

### **4-1 Personal Leave**

If employees are ineligible for any other Company leave of absence, ORE Financial Services, under certain circumstances, may grant a personal leave of absence without pay. A written request for a personal leave should be presented to management at least two (2) weeks before the anticipated start of the leave. If the leave is requested for medical reasons and employees are not eligible for leave under the federal Family and Medical Leave Act (FMLA) or any state leave law, medical certification also must be submitted. The request will be considered on the basis of staffing requirements and the reasons for the requested leave, as well as performance and attendance records. Normally, a leave of absence will be granted for a period of up to eight (8) weeks. However, personal leave may be extended if, prior to the end of leave, employees submit a written request for an extension to management and the request is granted. During the leave, employees will not earn vacation, personal days or sick days. ORE Financial Services will continue health insurance coverage during the leave if employees submit their share of the monthly premium payments to the Company in a timely manner, subject to the terms of the plan documents.

When the employees anticipate returning to work, they should notify management of the expected return date. This notification should be made at least one (1) week before the end of the leave.

Upon completion of the personal leave of absence, the Company will attempt to return employees to their original job or a similar position, subject to prevailing business considerations. Reinstatement, however, is not guaranteed.

Failure to advise management of availability to return to work, failure to return to work when notified or a continued absence from work beyond the time approved by the Company will be considered a voluntary resignation of employment.

### **4-2 Military Leave**

If employees are called into active military service or enlist in the uniformed services, they will be eligible to receive an unpaid military leave of absence. To be eligible for military leave, employees must provide management with advance notice of service obligations unless they are prevented from providing such notice by military necessity or it is otherwise impossible or unreasonable to provide such notice. Provided the absence does not exceed applicable statutory limitations, employees will retain reemployment rights and accrue seniority and benefits in accordance with applicable federal and state laws. Employees should ask management for further information about eligibility for Military Leave.

If employees are required to attend yearly Reserves or National Guard duty, they can apply for an unpaid temporary military leave of absence not to exceed the number of days allowed by law (including travel). They should give management as much advance notice of their need for

military leave as possible so that ORE Financial Services can maintain proper coverage while employees are away.

### **4-3 Maternity and Parental Leave**

ORE Financial Services wants to provide new parents flexibility and time to bond with their new child and adjust to their new family situation. Flexibility and family-friendly policies are essential to cultivating an atmosphere where employees can thrive professionally without sacrificing essential family obligations. Whether you are an expectant mother, a new father, or an adoptive parent, we believe you deserve time with your new family, which is why the company provides for parental leave for new parents regardless of the means by which your family is growing.

ORE Financial Services is firmly committed to protecting the rights of expectant mothers and parents in compliance with Title VII of the 1964 Civil Rights Act as amended by the Pregnancy Discrimination Act of 1978.

It is the Company's policy is to treat women affected by pregnancy, childbirth or related medical conditions in the same manner as other employees unable to work because of their physical condition in all employment aspects, including recruitment, hiring, training, promotion and benefits.

Further, the Company fully recognizes eligible employees' rights and responsibilities under the Family and Medical Leave Act, applicable state and local family leave laws, and the Americans with Disabilities Act. Pregnant employees may continue to work until they are certified as unable to work by their physician. Paid leave may be substituted for unpaid maternity leave if the employee has accrued vacation and sick time available.

When the employee returns to work, they are entitled to return to the same or equivalent job with no loss of service or other rights or privileges. Should the employee not return to work when released by their physician, they will be considered to have voluntarily resigned.

Employees may use accrued vacation and sick time, as applicable, toward unpaid leave. An Eligible Employee shall initially notify their supervisor of the need for Parental Leave and include the estimated timing and duration of such leave at least 30 calendar days in advance of the need for Parental Leave, where practical.

## **Section 5 - General Standards of Conduct**

### **5-1 Workplace Conduct**

ORE Financial Services endeavors to maintain a positive work environment. Each employee plays a role in fostering this environment. Accordingly, we all must abide by certain rules of conduct, based on honesty, common sense and fair play.

Because everyone may not have the same idea about proper workplace conduct, it is helpful to adopt and enforce rules all can follow. Unacceptable conduct may subject the offender to disciplinary action, up to and including discharge, at the Company's sole discretion. The following are examples of some, but not all, conduct which can be considered unacceptable:

1. Obtaining employment on the basis of false or misleading information.
2. Stealing, removing or defacing ORE Financial Services property or a co-worker's property, and/or disclosure of confidential information.
3. Completing another employee's time records.
4. Violation of safety rules and policies.
5. Violation of ORE Financial Services' Drug-Free Workplace Policy.
6. Violation of ORE Financial Services' Weapon-Free Workplace Policy.
7. Fighting, threatening or disrupting the work of others or other violations of ORE Financial Services' Workplace Violence Policy.
8. Failure to follow lawful instructions of a supervisor.
9. Failure to perform assigned job duties.
10. Violation of the Punctuality and Attendance Policy, including but not limited to irregular attendance, habitual lateness or unexcused absences.
11. Gambling on Company property.
12. Willful or careless destruction or damage to Company assets or to the equipment or possessions of another employee.
13. Wasting work materials.
14. Performing work of a personal nature during working time.
15. Violation of the Solicitation and Distribution Policy.
16. Violation of ORE Financial Services' Harassment or Equal Employment Opportunity Policies.
17. Violation of the Communication and Computer Systems Policy.
18. Unsatisfactory job performance.
19. Any other violation of Company policy.

Obviously, not every type of misconduct can be listed. Note that all employees are employed at-will, and ORE Financial Services reserves the right to impose whatever discipline it chooses, or none at all, in a particular instance. The Company will deal with each situation individually and nothing in this handbook should be construed as a promise of specific treatment in a given situation.

The observance of these rules will help to ensure that our workplace remains a safe and desirable place to work.



## **5-2 Punctuality and Attendance**

Employees are hired to perform important functions at ORE Financial Services. As with any group effort, operating effectively takes cooperation, communication, and commitment from everyone. Therefore, attendance and punctuality are very important. Unnecessary absences and lateness are expensive, disruptive and place an unfair burden on fellow employees and Supervisors. ORE Financial Services expects excellent attendance from all employees. Excessive absenteeism or tardiness will result in disciplinary action up to and including discharge.

ORE Financial Services does recognize, however, there are times when absences and tardiness cannot be avoided. In such cases, employees are expected to notify Supervisors as early as possible, but no later than the start of the work day. Asking another employee, friend or relative to give this notice is improper and constitutes grounds for disciplinary action. Employees should call, stating the nature of the illness and its expected duration, for every day of absenteeism.

To the extent work schedules do not interfere with business operations, ORE Financial Services has adopted flex-hours. Within the limits of the Company's established Working Hours and Schedule (see Section 2.4), employees are free to set their own work hours unless otherwise notified by their Manager. If there is a need for remote work, employees should get advance approval from their Manager.

Unreported absences of three (3) consecutive work days generally will be considered a voluntary resignation of employment.

## **5-3 Use of Communications and Computer Systems**

ORE Financial Services' communication and computer systems are intended primarily for business purposes; however limited personal usage is permitted if it does not compromise Company or customer information, hinder performance of job duties or violate any other Company policy. This includes the voicemail, e-mail and Internet systems. Users have no legitimate expectation of privacy in regard to their use of the ORE Financial Services communication and computer systems.

ORE Financial Services may access the voicemail and e-mail systems and obtain the communications within the systems, including past voicemail and e-mail messages, without notice to users of the system, in the ordinary course of business when the Company deems it appropriate to do so. The reasons for which the Company may obtain such access include, but are not limited to: maintaining the system; preventing or investigating allegations of system abuse or misuse; assuring compliance with software copyright laws; complying with legal and regulatory requests for information; and ensuring that Company operations continue appropriately during an employee's absence.

Further, ORE Financial Services regularly monitors all internet usage to ensure that such use is appropriate, will not compromise customer or Company data, and is consistent with Company

policy. The reasons for which the Company may specifically review an employee's use of the internet with Company property includes, but is not limited to: maintaining the system; preventing or investigating allegations of system abuse or misuse; assuring compliance with software copyright laws; complying with legal and regulatory requests for information; and ensuring that Company operations continue appropriately during an employee's absence.

The Company may store electronic communications for a period of time after the communication is created. From time to time, copies of communications may be deleted.

The Company's policies prohibiting harassment, in their entirety, apply to the use of the Company's communication and computer systems. No one may use any communication or computer system in a manner that may be construed by others as harassing or offensive based on race, national origin, sex, sexual orientation, age, disability, religious beliefs or any other characteristic protected by federal, state or local law.

Further, since the Company's communication and computer systems are intended for business use, all employees, upon request, must inform management of any private access codes or passwords.

Unauthorized duplication of copyrighted computer software violates the law and is strictly prohibited.

No employee may access, or attempt to obtain access to, another employee's computer systems without appropriate authorization.

Violators of this policy may be subject to disciplinary action, up to and including discharge.

#### **5-4 Use of Social Media**

ORE Financial Services respects the right of any employee to maintain a blog or web page or to participate in social networking, Twitter or similar site, including but not limited to Facebook and LinkedIn. However, to protect Company interests and ensure employees focus on their job duties, employees must adhere to the following rules:

Employees may not post on a blog or web page or participate on a social networking platform, such as Twitter or similar site, during work time or at any time with Company equipment or property.

All rules regarding confidential and proprietary business information apply in full to blogs, web pages and social networking platforms, such as Twitter, Facebook, LinkedIn or similar sites. Any information that cannot be disclosed through a conversation, a note or an e-mail also cannot be disclosed in a blog, web page or social networking site.

Whether the employees are posting something on their own blog, web page, social networking, Twitter or similar site or on someone else's, if the employee mentions the Company and also expresses either a political opinion or an opinion regarding the Company's actions that could pose

an actual or potential conflict of interest with the Company, the poster must include a disclaimer. The poster should specifically state that the opinion expressed is their personal opinion and not the Company's position. This is necessary to preserve the Company's goodwill in the marketplace.

Any conduct that is impermissible under the law if expressed in any other form or forum is impermissible if expressed through a blog, web page, social networking, Twitter or similar site. For example, posted material that is discriminatory, obscene, defamatory, libelous or violent is forbidden. Company policies apply equally to employee social media usage.

ORE Financial Services encourages all employees to keep in mind the speed and manner in which information posted on a blog, web page, and/or social networking site is received and often misunderstood by readers. Employees must use their best judgment. Employees with any questions should review the guidelines above and/or consult with their manager. Failure to follow these guidelines may result in discipline, up to and including discharge.

## **5-5 Personal and Company-Provided Portable Communication Devices**

ORE Financial Services-provided portable communication devices (PCDs), including smartphones and portable computers, should be used primarily for business purposes. Employees have no reasonable expectation of privacy in regard to the use of such devices, and all use is subject to monitoring, to the maximum extent permitted by applicable law. This includes, as permitted, the right to monitor all personal communications as necessary.

Some employees may be authorized to use their own PCD for business purposes. These employees should work with the IT department to configure and encrypt their PCD for business use. Communications sent via a personal PCD may also be subject to monitoring if sent through the Company's networks and the PCD must be provided for inspection and review upon request.

All conversations, text messages and e-mails must be professional. When sending a text message or using a PCD for business purposes, whether it is a Company-provided or personal device, employees must comply with applicable Company guidelines, including policies on sexual harassment, discrimination, conduct, confidentiality, equipment use and operation of vehicles. Personal use of both personal and Company-issued PCDs during working hours should be limited.

If employees who use a personal PCD for business resign or are discharged, they will be required to submit the device to the IT department for resetting on or before their last day of work. At that time, the IT department will reset and remove all Company information from the device, including but not limited to, Company information and personal data (such as contacts, files, e-mails, and photographs). The IT department will make efforts to provide employees with the personal data in another form (e.g., on a disk) to the extent practicable; however, the employee may lose some or all personal data saved on the device.

Employees may not use their personal PCD for business unless they agree to submit the device to the IT department on or before their last day of work for resetting and removal of Company information. This is the only way currently possible to ensure that all Company information is removed from the device at the time of termination. The removal of Company information is

crucial to ensure compliance with the Company's contractual obligations as well as our confidentiality and proprietary information policies and objectives.

Please note that whether employees use their personal PCD or a Company-issued device, the Company's electronic communications policies, including but not limited to, proper use of communications and computer systems, remain in effect.

### **Portable Communication Device Use While Driving**

Employees who drive on Company business must abide by all state or local laws prohibiting or limiting PCD use while driving. Further, even if usage is permitted, employees may choose to refrain from using any PCD while driving. "Use" includes, but is not limited to, talking or listening to another person or sending an electronic or text message via the PCD.

Regardless of the circumstances, including slow or stopped traffic, if any use is permitted while driving, employees should proceed to a safe location off the road and safely stop the vehicle before placing or accepting a call. If acceptance of a call is absolutely necessary while driving, and permitted by law, employees must use a hands-free option and advise the caller that they are unable to speak at that time and will return the call shortly.

Under no circumstances should employees feel that they need to place themselves at risk to fulfill business needs.

Since this policy does not require any employee to use a PCD while driving, employees who are charged with traffic violations resulting from the use of their PCDs while driving will be solely responsible for all liabilities that result from such actions.

Texting and e-mailing while driving is prohibited in all circumstances.

### **5-6 Inspections**

ORE Financial Services reserves the right to require employees while on Company property, or on client property, to agree to the inspection of their persons, personal possessions and property, personal vehicles parked on Company or client property, and work areas. This includes lockers, vehicles, desks, cabinets, work stations, packages, handbags, briefcases and other personal possessions or places of concealment, as well as personal mail sent to the Company or to its clients. Employees are expected to cooperate in the conduct of any search or inspection.

### **5-7 Smoking**

Smoking, including the use of e-cigarettes, is prohibited on Company premises and in all Company vehicles.

## **5-8 Team Portal**

Important notices and items of general interest are continually posted on the ORE Financial Services team portal and through announcements on Bamboo HR. Employees should make it a practice to log into the team portal frequently. This will assist employees in keeping up with what is current at ORE Financial Services. To avoid confusion, employees should not post or remove any material from the team portal.

## **5-9 Confidential Company Information**

During the course of work, employees may become aware of confidential information about ORE Financial Services' business, including but not limited to information regarding Company finances, pricing, products and new product development, software and computer programs, marketing strategies, suppliers and customers and potential customers. Employees also may become aware of similar confidential information belonging to the Company's customers. It is extremely important that all such information remain confidential, and particularly not be disclosed to ORE Financial Services' competitors. Any employee who improperly copies, removes (whether physically or electronically), uses or discloses confidential information to anyone outside of the Company may be subject to disciplinary action up to and including termination. Employees may be required to sign an agreement reiterating these obligations.

## **5-10 Conflict of Interest and Business Ethics**

It is ORE Financial Services' policy that all employees avoid any conflict between their personal interests and those of the Company and the Company's customers. The purpose of this policy is to ensure that the Company's honesty and integrity, and therefore its reputation, are not compromised. The fundamental principle guiding this policy is that no employee should have, or appear to have, personal interests or relationships that actually or potentially conflict with the best interests of the Company and its customers.

It is not possible to give an exhaustive list of situations that might involve violations of this policy. However, the situations that would constitute a conflict in most cases include but are not limited to:

1. holding an interest in or accepting free or discounted goods from any organization that does, or is seeking to do, business with the Company, by any employee who is in a position to directly or indirectly influence either the Company's decision to do business, or the terms upon which business would be done with such organization;
2. holding any interest in an organization that competes with the Company;
3. being employed by (including as a consultant) or serving on the board of any organization which does, or is seeking to do, business with the Company or which competes with the Company; and/or
4. profiting personally, e.g., through commissions, loans, expense reimbursements or other payments, from any organization seeking to do business with the Company.

A conflict of interest would also exist when a member of the employee's immediate family is involved in situations such as those described above.

This policy is not intended to prohibit the acceptance of modest courtesies, openly given and accepted as part of the usual business amenities, for example, occasional business-related meals or promotional items of nominal or minor value.

It is the employee's responsibility to report any actual or potential conflict that may exist between the employee (and the employee's immediate family) and the Company, including its customers.

## **5-11 Use of Facilities, Equipment and Property, Including Intellectual Property**

Equipment essential in accomplishing job duties is often expensive and may be difficult to replace. When using property, employees are expected to exercise care, perform required maintenance, system updates and follow all operating instructions, safety standards and guidelines.

Employees should notify their supervisor if any equipment, machines, or tools appear to be damaged, defective or in need of repair. Prompt reporting of loss, damages, defects and the need for repairs could prevent deterioration of equipment and possible injury to employees or others. Supervisors can answer any questions about the employees' responsibility for maintenance and care of equipment used on the job.

Employees also are prohibited from any unauthorized use of the Company's intellectual property, such as audio and videotapes, print materials, web content, and software.

Improper, careless, negligent, destructive, or unsafe use or operation of equipment can result in discipline, up to and including discharge.

Further, the Company is not responsible for any damage to employees' personal belongings unless the employee's supervisor requests that the employee bring the personal property to work for work-related use.

## **5-12 Health and Safety**

The health and safety of employees and others on Company property are of critical concern to ORE Financial Services. The Company intends to comply with all health and safety laws applicable to our business. To this end, we must rely upon employees to ensure that work areas are kept safe and free of hazardous conditions. Employees are required to be conscientious about workplace safety, including proper operating methods, and recognize dangerous conditions or hazards. Any unsafe conditions or potential hazards should be reported to management immediately, even if the problem appears to be corrected. Any suspicion of a concealed danger present on the Company's premises, or in a product, facility, piece of equipment, process or business practice for which the Company is responsible should be brought to the attention of management immediately.

Periodically, the Company may issue rules and guidelines governing workplace safety and health. The Company may also issue rules and guidelines regarding the handling and disposal of hazardous substances and waste. All employees should familiarize themselves with these rules and guidelines, as strict compliance will be expected.

Any workplace injury, accident, or illness must be reported to the employee's supervisor as soon as possible, regardless of the severity of the injury or accident.

### **5-13 Employee Dress and Personal Appearance**

Employees are expected to report to work well groomed, clean, and dressed according to the requirements of their position. Employees should contact their supervisor for specific information regarding acceptable attire for their position. If employees report to work dressed or groomed inappropriately, they may be prevented from working until they return to work well-groomed and wearing the proper attire.

### **5-14 Publicity/Statements to the Media**

All media inquiries regarding our business or any related issues must be referred to one of our officers. Only one of our authorized representatives will be permitted to speak to any media representative, to make or approve public statements on our behalf. No employee, unless specifically designated by us is authorized to make public statements on our behalf. Any employee wishing to write and/or publish an article, paper, or other publication about us, our business, or on our behalf must first obtain our approval.

### **5-15 Operation of Vehicles**

All employees authorized to drive Company-owned or leased vehicles or personal vehicles in conducting Company business must possess a current, valid driver's license and an acceptable driving record. Any change in license status or driving record must be reported to management immediately.

Employees must have a valid driver's license in their possession while operating a vehicle off or on Company property. It is the responsibility of every employee to drive safely and obey all traffic, vehicle safety, and parking laws or regulations, including any local law requiring vehicle operators to carry automobile and liability insurance. Drivers must demonstrate safe driving habits at all times.

Company-owned or leased vehicles may be used only as authorized by management.

### **Portable Communication Device Use While Driving**

Employees who drive on Company business must abide by all state or local laws prohibiting or limiting portable communication device (PCD) use, including cell phones, computers, or personal digital assistants, while driving. Further, even if use is permitted, employees may choose to

refrain from using any PCD while driving. "Use" includes, but is not limited to, talking or listening to another person or sending an electronic or text message via the PCD.

Regardless of the circumstances, including slow or stopped traffic, if any use is permitted while driving, employees should proceed to a safe location off the road and safely stop the vehicle before placing or accepting a call. If acceptance of a call is absolutely necessary while the employees are driving, and permitted by law, they must use a hands-free option and advise the caller that they are unable to speak at that time and will return the call shortly.

Under no circumstances should employees feel that they need to place themselves at risk to fulfill business needs.

Since this policy does not require any employee to use a PCD while driving, employees who are charged with traffic violations resulting from the use of their PCDs while driving will be solely responsible for all liabilities that result from such actions.

Texting and e-mailing while driving is prohibited in all circumstances.

## **5-16 Business Expense Reimbursement**

Employees will be reimbursed for reasonable approved expenses incurred in the course of business. These expenses must be approved by the employee's Supervisor, and may include air travel, hotels, motels, meals, cab fare, rental vehicles, or gas and car mileage for personal vehicles. All expenses incurred should be submitted to the employee's Supervisor along with the receipts in a timely manner.

Employees are expected to exercise restraint and good judgment when incurring expenses. Employees should contact their Supervisor in advance if they have any questions about whether an expense will be reimbursed.

## **5-17 References**

ORE Financial Services will respond to reference requests through the Human Resources Department. The Company will provide general information concerning the employee such as date of hire, date of discharge, and positions held. Requests for reference information must be in writing, and responses will be in writing. Please refer all requests for references to the Human Resources Department.

**Only the Human Resources Department may provide references.**

## **5-18 If You Must Leave Us**

Should the employee decide to leave the Company, they should provide a Supervisor with at least two (2) weeks advance notice of departure. Thoughtfulness will be appreciated. All Company property including, but not limited to, keys, security cards, parking passes, cell phones, laptop



computers, fax machines, uniforms, etc., must be returned at separation. Employees also must return all of the Company's Confidential Information upon separation. To the extent permitted by law, employees will be required to repay the Company (through payroll deduction, if lawful) for any lost or damaged Company property. As noted previously, all employees are employed at-will and nothing in this handbook changes that status.

## **5-19 Exit Interviews**

Employees who resign are requested to participate in an exit interview with the Human Resources Representative, if possible.

## **5-20 A Few Closing Words**

This handbook is intended to give employees a broad summary of things they should know about ORE Financial Services. The information in this handbook is general in nature and, should questions arise, any member of management should be consulted for complete details. While we intend to continue the policies, rules and benefits described in this handbook, ORE Financial Services, in its sole discretion, may always amend, add to, delete from or modify the provisions of this handbook and/or change its interpretation of any provision set forth in this handbook. Employees should not hesitate to speak to management if they have any questions about the Company or its personnel policies and practices.

## General Handbook Acknowledgment

This Employee handbook is an important document intended to help employees become acquainted with ORE Financial Services. This document is intended to provide guidelines and general descriptions only; it is not the final word in all cases. Individual circumstances may call for individual attention.

Because the Company's operations may change, the contents of this handbook may be changed at any time, with or without notice, in an individual case or generally, at the sole discretion of management.

Please read the following statements and sign below to indicate your receipt and acknowledgment of this handbook.

**I have received and read a copy of the ORE Financial Services' Employee handbook. I understand that the policies, rules and benefits described in it are subject to change at the sole discretion of the Company at any time.**

**I further understand that my employment is terminable at will, either by myself or the Company, with or without cause or notice, regardless of the length of my employment or the granting of benefits of any kind.**

**I understand that no representative of ORE Financial Services other than the Managing Member may alter "at will" status and any such modification must be in a signed writing.**

**I understand that my signature below indicates that I have read and understand the above statements and that I have received a copy of the Company's Employee handbook.**

Employee's Printed Name: \_\_\_\_\_

Employee's Signature: \_\_\_\_\_

Position: \_\_\_\_\_

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

The signed original copy of this acknowledgment should be given to management - it will be filed in your personnel file.

## Receipt of Sexual Harassment Policy

It is ORE Financial Services' policy to prohibit harassment of any employee by any supervisor, employee, customer or vendor on the basis of sex or gender. The purpose of this policy is not to regulate personal morality within the Company. It is to ensure that all employees are free from sexual harassment in the workplace or while attending work related functions. While it is not easy to define precisely what types of conduct could constitute sexual harassment, examples of prohibited behavior include unwelcome sexual advances, requests for sexual favors, obscene gestures, displaying sexually graphic magazines, calendars or posters, sending sexually explicit e-mails, text messages and other verbal or physical conduct of a sexual nature, such as uninvited touching of a sexual nature or sexually related comments. Depending upon the circumstances, improper conduct also can include sexual joking, vulgar or offensive conversation or jokes, commenting about the employee's physical appearance, conversation about one's own or someone else's sex life, or teasing or other conduct directed toward a person because of their gender which is sufficiently severe or pervasive to create an unprofessional and hostile working environment.

If the employee feels they have been subjected to conduct which violates this policy, they should immediately report the matter to any member of management. If unable for any reason to contact this person, or if the employee has not received a satisfactory response within five (5) business days after reporting any incident of perceived harassment, the employee should contact the Head of Human Resources. If the person toward whom the complaint is directed is one of the individuals indicated above, the employee should contact any higher-level manager in their reporting hierarchy. Every report of perceived harassment will be fully investigated and corrective action will be taken where appropriate. All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed. In addition, the Company will not allow any form of retaliation against individuals who report unwelcome conduct to management or who cooperate in the investigations of such reports in accordance with this policy. If the employees feel they have been subjected to any such retaliation, they should report it in the same manner in which a claim of perceived harassment would be reported under this policy. Violation of this policy including any improper retaliatory conduct will result in disciplinary action, up to and including discharge. All employees must cooperate with all investigations.

I have read and I understand ORE Financial Services' Sexual Harassment Policy.

Employee's Printed Name: \_\_\_\_\_

Employee's Signature: \_\_\_\_\_

Position: \_\_\_\_\_

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

The signed original copy of this receipt should be given to management - it will be filed in your personnel file.

## Receipt of Non-Harassment Policy

It is ORE Financial Services' policy to prohibit intentional and unintentional harassment of any individual by another person on the basis of any protected classification including, but not limited to, race, color, national origin, disability, religion, marital status, veteran status, sexual orientation or age. The purpose of this policy is not to regulate our employees' personal morality, but to ensure that in the workplace, no one harasses another individual.

If the employee feels that they have been subjected to conduct which violates this policy, they should immediately report the matter to any member of management. If the employee is unable for any reason to contact this person, or if the employee has not received a satisfactory response within five (5) business days after reporting any incident of perceived harassment, the employee should contact the Head of Human Resources. If the person toward whom the complaint is directed is one of the individuals indicated above, the employee should contact any higher-level manager in their reporting hierarchy. Every report of perceived harassment will be fully investigated and corrective action will be taken where appropriate. All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed. In addition, the Company will not allow any form of retaliation against individuals who report unwelcome conduct to management or who cooperate in the investigations of such reports in accordance with this policy. If the employee feels they have been subjected to any such retaliation, they should report it in the same manner in which the employee would report a claim of perceived harassment under this policy. Violation of this policy including any improper retaliatory conduct will result in disciplinary action, up to and including discharge. All employees must cooperate with all investigations.

I have read and I understand ORE Financial Services' Non-Harassment Policy.

Employee's Printed Name: \_\_\_\_\_

Employee's Signature: \_\_\_\_\_

Position: \_\_\_\_\_

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

The signed original copy of this receipt should be given to management - it will be filed in your personnel file.