



EMPLOYEE HANDBOOK

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Welcome!

On behalf of your colleagues, we welcome you to Adfinitas and wish you every success here.

We believe that each employee contributes directly to the growth and success of Adfinitas, and we hope you will take pride in being a member of our team.

This Employee Handbook was developed to describe some of the expectations of our employees and to outline the policies, programs and benefits available to eligible employees. Employees should familiarize themselves with the content of this Employee Handbook as soon as possible, as it should answer many questions related to your employment with Adfinitas.

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

Again, welcome!

PURPOSE OF EMPLOYEE HANDBOOK

This Employee Handbook is designed to acquaint you with Adfinitas Management, LLC and its subsidiaries and to provide you with information about working conditions, employee benefits and some of the policies, rules and procedures affecting your employment. You should read, understand, and follow the policies, rules and procedures described in this Employee Handbook. It describes many of your responsibilities as an employee and outlines the programs developed by Adfinitas to benefit you as an employee. By accepting employment or continued employment with Adfinitas, you acknowledge and agree that this Employee Handbook applies to you and that you are responsible for complying with the most up to date version of this Handbook, which can be accessed on the Employee Portal.

While every attempt has been made to create these policies consistent with federal and state law, if an inconsistency arises, the policy/policies will be enforced consistent with the applicable law.

No Employee Handbook can anticipate every circumstance or question about company policy. Adfinitas has prepared this Employee Handbook for informational purposes only. None of the statements, policies, procedures, or rules contained in this handbook constitutes a guarantee of employment, a guarantee of any other rights or benefits or a contract of employment, express or implied. Adfinitas Management reserves the right to revise, change, supplement or eliminate any policies or portion or provisions set forth in this Employee Handbook at any time with or without notice, except for the rights of the parties to terminate employment at will, which may be modified only by an express written agreement signed by the employee and the CEO of Adfinitas. This handbook supersedes all previous handbooks, statements, policies, procedures, and rules given to employees, whether verbal or written, with the exception only of the terms outlined within individual contracts.

I. EMPLOYMENT

Equal Employment Opportunity

Adfinitas maintains a continuing policy of nondiscrimination in all employment practices and decisions, ensuring equal employment opportunities for all qualified individuals without regard to race, color, religion, sex, national origin, age, physical or mental disability, veteran status, genetic information, or any other protected status. This applies to both Adfinitas employees and applicants for employment with the Company.

In keeping with this policy, Adfinitas does not discriminate against any person because of race, color, religion, sex, sexual orientation, marital status, gender identity, national origin, disability, age, veteran status, genetic information, or any other characteristic protected by federal, state, or local law. This nondiscrimination policy extends to all terms, conditions, and privileges of employment as well as all employment actions, including but not limited to recruiting, hiring, promotions, compensation, training, benefits, and termination of employment.

All 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 immediately.

Employees can raise concerns and make reports without fear of reprisal.

Americans with Disabilities Act (ADA)

Title I of the Americans with Disabilities Act (ADA) requires employers to provide reasonable accommodation to qualified applicants and employees with a disability. An accommodation can be a change or modification to the workplace, allowing the employee with a disability to perform his or her essential job duties or enjoy the benefits and privileges of employment.

The types of accommodations needed and provided will depend on the limitations of the disability and the individual employee's ability to perform the essential job duties of the position. Accommodations will be designed to meet the specific circumstances of the individual.

The accommodation process involves a systematic and in-depth review of the job requirements, and the limitations or performance problems the employee's disability creates. The purpose of this review is to identify changes or modifications that will allow the employee to perform the essential job duties free from workplace obstacles the employee's disability previously created.

If an employee feels like they are in need of accommodation, they will need to contact the Human Resources Department to begin the process of requesting the accommodation.

Employee Relations

Adfinitas believes that the work conditions, wages, and benefits it offers to its employees are competitive with those offered by other employers in this area and in this industry. If employees have concerns about work conditions or compensation, they are strongly encouraged to voice these concerns openly and directly to their supervisor.

Our experience has shown that when employees deal openly and directly with supervisors, the work environment can be excellent, communications can be clear, and attitudes can be positive. We believe that Adfinitas amply demonstrates its commitment to employees by responding effectively to employee concerns.

Employment Classifications

Adfinitas has established certain employment classifications so that employees understand their employment status and benefit eligibility. These classifications have been established in accordance with applicable federal and state law. Nothing in this policy shall be construed to limit or change the Company's employment at-will policy. All employment with Adfinitas is for an unspecified time and the right to terminate the employment relationship at will, at any time, with or without cause or notice is retained by both the employee and the Company.

Every employee is designated as either **exempt** or **non-exempt**.

- **Exempt employees** are those who are exempt from federal and state overtime laws and generally are paid a fixed amount of compensation that does not vary based on the number of hours worked.
- **Non-exempt employees** are those who are entitled to overtime pay in accordance with applicable federal and state overtime provisions. For all hours worked more than 40 hours in a workweek, non-exempt employees will be paid at one and one-half times their regular rate of pay.

In addition, every employee will be further classified as either full-time, part-time, PRN, or temporary.

- **Full-time (FT)** employees are those who are not in a temporary status and who are regularly scheduled to work at least 30 (thirty) hours per week.
- **Part-time (PT)** employees are those who are not in a temporary status and who are regularly scheduled to work less than 30 (thirty) hours per week.
- **Per Diem (PRN)** employees are those who are not regularly scheduled and are available for at least one shift per quarter.
- **Temporary** employees are those who are hired directly by Adfinitas for a limited time. Employment beyond any initially stated period does not in any way constitute or imply a change in employment classification. Temporary employees retain that status, unless and until notified of a change by the Company.

In addition to the above categories, Adfinitas may also engage workers who qualify as

independent contractors.

- **Independent Contractors** are those who are not considered employees and who work independently and pay their own taxes.

Personnel Data Changes

It is the responsibility of each employee or independent contractor to promptly notify Adfinitas of any changes in personnel data. Personal mailing addresses, telephone numbers, number and names of dependents, individuals to be contacted in the event of emergency, educational accomplishments, and other such status reports should be accurate and current always. If any personnel data has changed, notify the Human Resources Department.

Employment At-Will

Employees of Adfinitas are considered to be “at-will,” which means that it is for an unspecified period of time and either the employee or the Company may end the relationship at any time for any reason, with or without notice or cause, pursuant to the terms of any applicable employment agreement. Nothing contained in the Company’s Employee Handbook, or in any oral or written statement shall change the employment at-will status, or otherwise limit the right to terminate employment at will. 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 Adfinitas and any of its employees. No manager or employee of Adfinitas shall have the authority to enter into an employment agreement - express or implied - with any employee providing for employment other than at-will.

This policy of at-will employment defines the sole and entire relationship between employees and Adfinitas as to the duration of your employment and the circumstances under which your employment may be terminated.

Contingencies for Employment

Offers of employment with Adfinitas Health are made contingent upon the successful completion of screenings including but not limited to:

- Vaccines (including Covid and Influenza)
- Drug screen
- Criminal background check
- Reference checks
- Verification of clinical license and certification
- Pre-employment physical

Pre-Employment Drug Screening

Beginning August 1, 2021, all employees will be required to pass a pre-employment drug screening test as a condition for employment.

COVID Vaccination Requirement

Verification of full COVID vaccination is a condition of employment absent a valid medical or religious exemption.

Media Relations

The Vice President of Client Services is the sole individual authorized to speak to the media on behalf of Adfinitas Health (“Adfinitas”). In certain circumstances, they will delegate that authority to specific individuals.

Adfinitas believes it is important to communicate truthfully using consistent messaging that aligns with our core values and complies with all applicable laws (such as HIPAA) and the contractual obligations to our hospital and nursing home partners. It is important for all Adfinitas staff to reinforce this goal by following these guidelines.

We strive to ensure that requests are being properly vetted which allows the company to track media activity, communicate with our hospital and nursing home partners, and ensure consistency of message and appropriate subject matter expertise. We may also help prepare any designees in advance of interviews.

Procedure

1. Before speaking or providing any information to any member of the press or media production personnel, please contact the Vice President of Client Services.
2. If they are not available, take the following steps:
 - Clearly convey that you are not authorized to speak on behalf of Adfinitas or the hospital/nursing home.
 - Find out the reporter’s name, phone number, and deadline.
 - Find out the nature of the story/piece (“Our VP of Client Services is the spokesperson for Adfinitas. May I ask what kind of a story you are working on so that we can gather the information and they will have all the facts in front of them when they call you back?”)
 - Let the reporter know that the VP of Client Services or another staff member will return the call.
 - Contact the VP of Client Services immediately if the deadline is imminent.
 - Please do not offer information to media — even if you know the answer. The VP of Client Services will determine whether you should speak to the media or if a different company designee would be more appropriate given the subject matter

sought.

Key Points To Remember When Dealing with the Media

- Be polite.
- Be helpful.
- Find out what the reporter needs to know and what his or her deadline is.
- Don't let a deadline pass without a response.
- Don't get drawn into providing information or opinions that you don't have the authority to provide.
- Always inform the VP of Client Services and your immediate supervisor of the call for follow-up.

Use of Image Policy

Adfinitas reserves the right to use any image, voice and name in print, photographs, and video and audio recordings, in connection with the business activities of its employees and independent contractors. This use includes publications and distribution in printed, electronic, and digital media, including, but not limited to, course materials and brochures, video and audio broadcast programs, and website, social media, and online communications.

II. BENEFITS AND LEAVES OF ABSENCE

Employee Benefits

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

Other benefit eligibility is dependent upon a variety of factors, including employee status, business unit, and job role. You will be informed of the programs for which you are eligible.

The following benefit programs are currently available to eligible employees:

- 401(k) Savings Plan
- Medical Insurance
- Dental Insurance
- Life Insurance
- Long-Term Disability
- Short-Term Disability
- Paid Time Off (PTO)
- Jury Duty Pay
- Bereavement Leave
- Continuing Medical Education Reimbursement

Some benefit programs require contributions from the employee. Adfinitas employee benefit programs can be revised or rescinded at any time, to the extent permitted by law.

Holidays

Adfinitas currently observes the following holidays:

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

The administrative offices/functions of the Company close in observance of the holiday, as well as clinical functions at some post-acute locations. Generally, if a holiday falls on a Saturday, Adfinitas will celebrate the holiday on the Friday immediately preceding it. If a holiday falls on a Sunday, Adfinitas will observe the holiday on the following Monday. All full-time administrative staff, and post-acute providers, are not expected to report to work on that day and will receive pay at their regular rate for the holiday itself ("Holiday Pay"). Holiday Pay is not considered hours worked and is not counted towards overtime.

In the event a non-exempt full-time administrative employee is required to work on the holiday, they will receive straight time for all hours worked that day in addition to their standard holiday pay.

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 otherwise would have applied.

To receive holiday pay, employees must work their scheduled day immediately before and immediately after the holiday. If an employee is absent on his or her scheduled day immediately before or immediately after the holiday, he or she will not be paid for the holiday unless it is agreed to in advance of the holiday. If an employee is scheduled to work on the holiday and is absent, he or she will not be paid for the holiday.

Religious Holidays

Adfinitas will attempt to accommodate employee requests to observe religious holidays. Employees may request unpaid time off from work for the observance of religious holidays by notifying his or her immediate supervisor at least ten (10) days in advance of the required time off. Paid-time-off may be used to receive pay for religious observances.

Floating Holidays

All full-time, non-clinical employees will receive one floating holiday per year in addition to paid time off and regular holidays. This floating holiday will allow employees to have additional paid leave to cover absences for personal reasons.

Employees will be awarded one floating holiday on January 1. Employees hired after the first of

the year, will be eligible for this day the following year.

Floating holidays may be used to cover full, or partial-day absences. They must be taken in the calendar year in which given. Under no circumstances will this day be carried over to the next calendar year, nor may it be cashed out if not taken, or paid upon termination of employment.

A floating holiday must be scheduled and approved in advance by the employee’s immediate supervisor.

Paid-Time-Off Benefits

All full-time administrative staff are eligible for PTO. Clinical staff eligibility and amount accrued is governed by each individual’s employment agreement.

Paid-time-off (PTO) is accrued per pay period and increased per anniversary year, beginning on the first day of employment per the following schedule, and is available to be used after the employee fulfills their first 90 days of employment with Adfinitas.

Non-Exempt Full-time Employee – Annual Vacation Accrual (26 pay periods per year)

Years 1 through 4	.0385 per hour, 3.08 hours per pay period, up to 80 hours per year
Years 5 through 9	.0578 per hour, 4.62 hours per pay period, up to 120 hours per year
Years 10 or more	.0769 per hour, 6.15 hours per pay period, up to 160 hours per year

Exempt (Non-Executive) Full-time Employee – Annual Vacation Accrual (26 pay periods per year)

Years 1 through 4	.0578 per hour, 4.62 hours per pay period, up to 120 hours per year
Years 5 through 9	.0769 per hour, 6.15 hours per pay period, up to 160 hours per year

Clinical and Executive level employees’ entitlement to PTO will be based on the terms of negotiated contracts.

Carry-over and Pay-out of PTO

Employees may carry over all accrued but unused PTO balances from year to year. Accrued but unused PTO hours will not be paid out.

Scheduling PTO

All planned time off requests must be submitted to your lead/supervisor at least 8 weeks in advance for providers and 5 days in advance for administrative staff. The lead/supervisor has the discretion to approve or deny requests based on operational requirements and staffing needs. In periods of light census, the leads/supervisors will be responsible for implementing mandatory time off for the employees with the most leave. In addition, the leads/supervisors will be responsible for managing all PTO balances, in an effort to maintain balances of less than 180 hours.

If a clinical employee has scheduled leave during a block but is called into work on an urgent/emergent basis due to staffing issues, then that shift will be paid at their

moonlighting rate, and the provider will not be deducted their PTO. However, scheduled/pre-arranged moonlighting and scheduled PTO cannot be taken during the same block.

Leadership may approve use of PTO before it has been earned but will require an employee to pay back any advanced PTO if the employee quits or is terminated prior to earning the PTO used.

Termination

Subject to the terms of any employment agreement to the contrary, when an employee discontinues employment or changes employment status to a status ineligible to receive or accrue PTO with the Company, he or she will forfeit any unused balance and not be paid for any unused PTO, regardless for reason of separation or status change. In the event that an employee is rehired into or has a status change back to a PTO eligible position within six (6) months, the employee's PTO balance will be restored and the employee's seniority for purposes of PTO will also be restored.

Employees (exempt and non-exempt) are not allowed to take leave after giving notice of resignation. This includes leave that was scheduled prior to giving notice of resignation. Scheduled leave for educational benefits (e.g. Continuing Medical Education for exempt employees) is also not allowed once an employee has given notice of resignation. Any reimbursement for educational benefits will also not be allowed once an employee has given notice of resignation (e.g. Continuing Medical Education Allowance for exempt employees).

Adfinitas has elected to provide Paid-time-off, which is reflective of all time off. There is not independent sick leave available.

If a clinical employee is unable to work because of illness or injury or a medical appointment, they must notify their supervisor or manager at least twelve hours prior to the start of the scheduled shift. Administrative employees must notify their supervisor or manager a minimum of two hours prior to the start of their workday. Notification must be via telephone, with telephonic message if the supervisor does not answer. Texting, emailing, or passing the message through another employee is not acceptable. If an employee becomes sick during the workday, they must notify their manager or supervisor before leaving the work site.

Employees absent more than three (3) consecutive days due to their own illness or injury must apply for a medical leave of absence. Adfinitas Health reserves the right to require confirmation of medical care and/or a release to return to work after any illness the employee or their dependent experiences which requires unplanned time off work for any number of days or scheduled shifts.

Based on the nature of the illness or injury and the employee's duties and responsibilities, Family Medical Leave Act of 1993 will be afforded to qualified employees, or a company approved leave of absence will be authorized based on need.

If the APP provider has PTO time available to cover shift(s) missed due to their own illness or need to care for a dependent, PTO will be used to pay for the time missed. For physician

providers, the lead will have discretion in either allowing PTO to be used if available OR not compensating (docking the pay) of the physician for that shift.

Adfinitas recognizes all local, county, and state, sick time laws for employees. The PTO accrual for each employee will meet any state or local leave requirements. Please see Appendix B for complete information on the current laws in applicable locations.

Bereavement Leave

All full-time employees who wish to take time off due to the death of an immediate family member should notify their supervisor immediately.

Bereavement leave will normally be granted unless there are unusual business needs or staffing requirements. An employee may, with their supervisor's approval, use any available PTO for additional time off as necessary.

Bereavement pay is calculated based on the base pay rate at the time of absence, and it will not include any special forms of compensation, such as incentives, commissions, bonuses, overtime, moonlighting, or shift differentials.

Employees are allowed up to three (3) consecutive business days off from regularly scheduled duty with regular pay in the event of the death of the employee's family members; including those family members through marriage, domestic partnerships, adoptions, legal guardian relationships, or individuals that have stood "in loco parentis" to the employee when they were a minor. These are identified as the employee's spouse, child, father, father-in-law, mother, mother-in-law, son-in-law, daughter-in-law, brother, sister, stepfather, stepmother, stepbrother, stepsister, stepson or stepdaughter, brother-in-law, sister-in-law, aunt, uncle, grandparent, grandchild or spouse's grandparent.

To be eligible for paid bereavement leave, the employee generally must attend the funeral, or memorial service, of the deceased relative.

To request bereavement leave, the employee will need to identify the relative in a request to their immediate leader, it will be processed during the regular pay period in which the leave falls.

Jury Duty

Adfinitas appreciates that all employees have a responsibility to serve as jurors if called and will be permitted to do so. However, we recognize that for a significant portion of our workforce, specifically our clinical hospital-based staff, has the latitude to schedule their jury duty service in a way that does not conflict with their work schedule and will be expected to do so. Accordingly, no compensation will be provided to these staff members for their jury duty service.

For our full-time employees that are scheduled Monday through Friday and do not have the latitude to schedule jury duty service outside of their workweek schedule, the Company will

compensate them at their normal salary or hourly rate for up to 3 days in a calendar year while on jury duty. Jury duty time will not be considered towards the overtime calculation. At the end of the 3 days, employees may use accumulated paid time off (PTO) if they wish to continue to be paid while on jury duty. Employees may also take the additional jury duty time as an unpaid leave of absence.

If employees take an unpaid leave of absence for additional days of jury duty, their benefits such as health care, dental, vision, and disability will be continued, and the employee contributions will be collected upon return from the unpaid leave.

An employee who receives a jury duty summons shall present the summons to their supervisor immediately. Employees on jury duty must report to work on days or parts of days when they are not required to serve.

Witness Duty

Any employee subpoenaed to appear in court as a witness in a non-work-related matter, shall be allowed to take time off from work but must use their PTO if they wish to be paid during such absence. An employee who is required to appear in court must present the subpoena to their supervisor as soon as possible. The employee is expected to report for work whenever the court schedule permits.

Family and Medical Leave Policy

The Company provides family and medical leaves of absence to eligible employees in accordance with the federal Family and Medical Leave Act (FMLA) and applicable state or local laws. An eligible employee will be entitled to a total of 12 weeks of unpaid FMLA leave during a 12-month period for the following reasons:

- The birth and care of a newborn child;
- The placement with the employee of a child for adoption or foster care;
- To care for the employee's spouse, child or parent with a serious health condition;
- Because of an employee's own serious health condition that makes the employee unable to perform the functions of the employee's job; and
- Because of any qualifying exigency arising out of the employee's spouse, child or parent being a covered military member on active duty or having been notified of an impending call or order to active duty in support of a contingency operation.

A "serious health condition" is an illness, injury, impairment or physical or mental condition that involves (a) an overnight stay in a hospital, hospice or medical care facility or (b) continuing treatment by a health care provider, as defined under the FMLA. Subject to certain conditions, the continuing treatment requirement may be met by a period of incapacity of more than 3 consecutive calendar days combined with at least two visits to a health care provider or one visit and a regimen of continuing treatment, or incapacity due to pregnancy,

or incapacity due to a chronic condition.

A “qualifying exigency” that may qualify for FMLA leave generally includes to address issues arising from a short-notice deployment, to attend an official military ceremony, program or event, to arrange for alternative childcare due to active duty or call to active duty status, to make or update financial or legal arrangements, to attend counseling, to spend time with a covered military member on short-term rest and recuperation, to attend post-deployment activities and to address other events which arise out of the covered military member’s active duty or call to active duty status.

An eligible employee will be entitled to a total of 26 weeks of unpaid FMLA leave during a single 12- month period to care for a spouse, child, parent or next of kin who is a covered service member with a serious injury or illness.

The 12-month period for all FMLA leave, except leave to care for a covered service member with a serious injury or illness, will be determined using a rolling 12-month period measured *backward* from the date an employee uses any FMLA leave. The 12-month period for leave to care for a covered service member with a serious injury or illness will be determined using the 12-month period measured *forward* from the date an employee’s first FMLA leave to care for the covered service member begins.

Eligibility

An employee is eligible for FMLA leave after being employed by the Company for 12 months and having worked for at least 1,250 hours within the 12-month period immediately preceding the beginning of the leave.

Spouses Working for the Company

If both spouses work for the Company and are eligible for FMLA leave, their combined total amount of leave during any 12-month period will be limited to 12 weeks for the birth of a child, placement of a child for adoption or foster care, and to care for the employee’s parent with a serious health condition and will be limited to 26 weeks if the leave is taken to care for a covered service member with a serious injury or illness.

Intermittent or Reduced Schedule Leave

An employee may take FMLA leave intermittently or on a reduced leave schedule when medically necessary or due to qualifying exigencies. The Company may temporarily transfer an employee requiring intermittent leave or leave on a reduced work schedule to an available alternative position for which the employee is qualified and which better accommodates recurring periods of leave. When the employee no longer needs leave on an intermittent or reduced leave schedule basis, the employee will be returned to the substantially same or equivalent job that he or she held when the leave began.

Reinstatement

An employee returning to work following FMLA leave will be able to return to the substantially same position the employee held prior to taking leave or to an equivalent position with

equivalent benefits, pay and other terms and conditions of employment, unless the employee would have been terminated due to a layoff, downsizing, restructuring, etc., if the employee had not taken leave.

An employee who fails to return to work following FMLA leave will be considered to have voluntarily resigned their employment.

The Company may require an employee on FMLA leave to report periodically on the employee's status and intent to return to work.

Benefits During Leave

An employee may choose to continue health insurance benefits while on FMLA leave by making arrangements to pay the normal employee portion of health insurance premiums. If the employee fails to make the required payments for health coverage within 30 days of the date that such payments are due, health coverage will be discontinued. In addition, unless due to circumstances beyond the employee's control, if an employee fails to return to work following FMLA leave, the Company shall be entitled to recover from the employee the Company's share of the health insurance premiums paid during the period of the employee's unpaid FMLA leave.

The Company will offer an employee on FMLA leave the same benefits (such as vacation or sick leave accrual, etc.) as the Company provides to employees on other, non-FMLA leaves of absence.

Substitution of Paid Leave

An employee who takes FMLA leave may substitute any accrued PTO for the unpaid FMLA leave, as permitted by law. This means that the paid time will run concurrently with the unpaid FMLA leave. In addition, if an employee is absent from work due to an injury covered by worker's compensation, if the injury qualifies as a "serious health condition," the Company may designate the leave as FMLA leave and the worker's compensation leave and FMLA leave will run concurrently.

Procedure for Requesting FMLA Leave

If the need for leave is foreseeable, an employee must provide the Company with at least thirty (30) days' advance notice before the FMLA leave is to begin. If thirty (30) days' notice is not practicable due to a medical emergency or the date for leave is not known, the employee must provide notice as soon as practicable based on the facts and circumstances of the individual case. Generally, it should be practicable for the employee to provide notice of the need for leave either the same day or the next business day after learning of the need for FMLA leave.

When planning medical treatment, an employee must consult with their supervisor and make a reasonable effort to schedule the treatment so as not to unduly disrupt the Company's operations, subject to the approval of the employee's health care provider.

When the need for FMLA leave is not foreseeable and absent unusual circumstances, the employee must comply with Adfinitas' usual and customary call-in procedures to report their

absence from work. In addition, an employee has an obligation to respond to the Company's questions designed to determine whether an absence or request for leave is potentially an FMLA-qualifying leave. Failure to respond to the Company's reasonable inquiries regarding the leave request may result in denial of FMLA protection if the Company is unable to determine whether the leave is FMLA-qualifying.

Medical and Other Certification Requirements

Adfinitas requires that an employee requesting FMLA leave provide medical certification from a health care provider regarding the employee's own serious health condition or that of the employee's covered family member. Adfinitas also may request periodic recertification of the need for leave taken because of an employee's own serious health condition or the serious health condition of a family member, to the extent permitted by law.

For an employee requesting FMLA leave because of a qualifying exigency arising out of the active duty or call to active duty status of a covered military member, Adfinitas requires that the employee provide a copy of the covered military member's active duty orders or other documentation issued by the military which indicates that the covered military member is on active duty or called to active duty status and the dates of that service.

For an employee requesting FMLA leave to care for a covered service member with a serious injury or illness, the Company requires that the employee obtain a certification completed by an authorized health care provider of the covered service member.

Failure to provide any required certification in a timely manner may result in the denial of FMLA coverage.

Fitness for Duty Certification

The Company requires that an employee seeking to return to work following FMLA leave due to the employee's own serious health condition provide certification from the employee's health care provider that the employee is able to come back to work and is able to perform the essential functions of the employee's job. If an employee fails to provide a fitness-for-duty certification, the employee may no longer be entitled to reinstatement and may be terminated.

Company Notification of Eligibility and Designation of Leave

The Company will inform employees requesting leave whether they are eligible under FMLA and if not eligible, will provide a reason for the ineligibility. The Company also will inform employees if leave will be designated as FMLA-protected leave and the amount of leave counted against the employee's FMLA leave entitlement.

Other Employment and Activities Prohibited During Leave

An employee on FMLA leave from the Company may not work for another employer or engage in activities that violate specific health care provider restrictions, unless granted permission in advance from the Company.

FMLA Rights

The Company will not interfere with, restrain, or deny the exercise of any right provided under FMLA. Nor will the Company discharge or discriminate against any person for opposing any practice made unlawful by FMLA or for involvement in any proceeding under or relating to FMLA.

Medical Leave (When FMLA is not applicable)

All full-time employees are eligible to take an unpaid medical leave of absence for up to twelve (12) weeks, at the discretion of Adfinitas leadership. A request for a medical leave of absence must be submitted on a Leave of Absence Request form. All requests for a medical leave of absence must be accompanied by a statement from the employee's health care provider indicating the need for the medical leave and the expected return to work date. All medical leaves of absence must be approved in advance by the employee's supervisor, or manager, and Human Resources.

The period an employee is on a medical leave of absence is unpaid and will not be considered time worked for purposes of determining eligibility for, or the amount of, certain benefits. If a paid holiday falls during the period an employee is on a leave of absence, the employee will not be eligible for the holiday pay. Payment of benefits premiums will be the full responsibility of the employee that is on leave. Their payments will include the employer and employee portions and must be paid to the order of Adfinitas Management, LLC.

Except as required by law, Adfinitas cannot guarantee an employee's position will be open when he, or she, returns from the leave of absence. If an employee's former position is unavailable when he or she is ready to return to work from an approved leave, reasonable efforts will be made to place the employee in a comparable position for which he, or she, is qualified. An employee who does not accept the position offered will be considered to have voluntarily terminated their employment with Adfinitas effective the day such refusal is made.

If an employee does not return to work immediately after an approved medical leave or fails to contact the Company to request an extension of the leave, Adfinitas will assume that the employee has voluntarily resigned their position with the Company.

Military Service Leave

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

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

Paid-time-off and holiday benefits will continue to accrue during a military leave of absence of no more than 2 weeks.

Employees on military leave for up to 30 days are required to return to work for the first regularly scheduled shift after the end of service, allowing reasonable travel time.

Employees on longer military leave must apply for reinstatement in accordance with USERRA and all applicable state laws.

Employees returning from military leave will be placed in the position they would have attained had they remained continuously employed or a comparable one depending on the length of military service in accordance with USERRA. They will be treated as though they were continuously employed for purposes of determining benefits based on length of service.

III. COMPENSATION

Time-keeping System

Accurately recording time worked is the responsibility of every non-exempt employee. Federal and state laws require Adfinitas to keep an accurate record of time worked to calculate employee pay and benefits. Time worked is all the time spent on the job performing assigned duties.

Non-clinical, non-exempt employees should accurately record the time they begin and end their workday. The beginning and ending time of each meal period will automatically be recorded as 30 minutes for each day unless the employee notifies their supervisor and payroll administrator. Employees should also record the beginning and ending time of any split shift or departure from work for personal reasons. **Overtime work must always be approved by a supervisor before it is performed.**

Non-exempt employees should report to work no more than 5 minutes prior to their scheduled starting time nor stay more than 5 minutes after their scheduled stop time without express, prior authorization from their supervisor.

It is each employee's responsibility to sign their time record to certify the accuracy of all time recorded. Your supervisor will review and then initial the time record before submitting it for payroll processing. In addition, if corrections or modifications are made to the time record, both the employee and the supervisor must verify the accuracy of the changes by initialing the time record.

Pay Schedule/Paydays

All employees are paid every two weeks; there are a total of 26 pay periods in a year. Each paycheck will include earnings for all work performed through the end of the previous payroll period.

If a regularly scheduled payday falls on a day off such as holiday, employees will receive pay on the last day of work before the regularly scheduled payday.

Pay Corrections

Adfinitas takes all reasonable steps to ensure that employees receive the correct amount of pay in each paycheck and that employees are paid promptly on the scheduled payday.

In the unlikely event that there is an error in the amount of pay, the employee should promptly bring the discrepancy to the attention of their supervisor so that corrections can be made as quickly as possible.

Direct Deposit

Employees may have pay directly deposited into their bank accounts if they provide advance written authorization to Adfinitas. Employees will have electronic access to an itemized statement of wages when Adfinitas makes direct deposits.

Overtime

When operating requirements or other needs 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 a supervisor's prior authorization. Overtime assignments will be distributed as equitably as practical to all employees qualified to perform the required work. The work week will be defined as Monday through Sunday.

Overtime compensation is paid to all non-exempt employees in accordance with federal and state wage and hour restrictions. Overtime pay is based on actual hours worked. Paid-time-off, bereavement, jury duty, holiday pay, or any leave of absence will not be considered hours worked for purposes of performing overtime calculations.

Salary Basis Policy

Employees classified as exempt salaried employees will receive a set salary which is intended to compensate for all hours worked. The salary will be established at the time of hire, or when the employee becomes classified as an exempt employee. 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.

To the extent permitted by federal and state law, your salary may be subject to certain deductions, such as:

- Full day absences for personal reasons;
- Full day absences for sickness or disability, where you have exhausted or have not yet accrued enough leave time;
- Full week disciplinary suspensions for infractions of written company policies and procedures;
- Family and Medical Leave absences (either full or partial day absences);
- The first or last week of employment in the event you work less than a full week;
- Employee portions of health, dental, life insurance premiums or other such benefits;
- State, federal and local taxes;
- Contributions to a 401(k) or other savings or pension plan.
- Any other deductions that have been agreed upon in writing.

Your salary will not be reduced for any of the following reasons:

- Partial day absences for personal reasons, sickness or disability (4 hours or less);
- Any other deductions prohibited by state or federal law.

Note: It is not an improper deduction to reduce an employee's paid-time-off from an employee's leave bank for full or partial day absences for sickness or disability if the employer has a sickness or disability policy that provides for wage replacement benefits.

If you believe you have been subject to any improper deductions from your salary, you should immediately report the matter to your supervisor, Payroll or Human Resources. If it is determined that an improper deduction was made, you will be promptly reimbursed for the improper deduction.

CME Reimbursement Policy

Overview

It is a policy of Adfinitas Health to reimburse providers for eligible Continuing Medical Education (CME) expenses as well as costs associated with maintaining licensing and certification during employment, limited to an annual allowance.

Continuing Education - General Information

CME reimbursement amounts to be deducted from a provider's annual allowance must involve the achievement of continuing medical education credits necessary for active licensure required for employment with Adfinitas Health.

In general, reimbursement of CME may include costs such as registering for live or online courses/conferences which award CME, society dues for professional memberships which provide access to CME, subscription fees for internet based medical information services where CME is provided for researching information (i.e. Up To Date or similar service), subscription

fees for Internal Medicine Journals where CME is provided as part of the subscription and payment for internal medicine boards where CME is earned throughout the process.

Additionally, reasonable travel, meals, airfare, hotel stay and transportation expenses for providers who have enrolled in live CME courses/conferences are eligible expenses to be deducted from the annual CME allowance. If an employee is accompanied by a spouse, significant other, or anyone else not employed by Adfinitas Health, the travel and meal expenses for the related individual are not eligible for reimbursement.

Consistent with IRS guidelines around reimbursable business expenses, equipment, or hardware requests along with magazine subscriptions are not eligible expenses for reimbursement.

Continuing Education - General Information

All providers are expected to begin employment with a valid state license and board certification, as applicable. The company will reimburse providers for costs associated with maintaining their license(s) or board certification(s), subject to the annual CME limit.

In the event the company asks a provider to secure a license to practice in another state, the company will reimburse fully (and any amounts will not be deducted from the provider's CME allowance) the provider for costs associated with obtaining and maintaining that license(s) during their qualifying employment with the company.

Timing

CME allowances are provided on a calendar year basis although cannot be used in the first 90 days of employment. The CME allowance is prorated for partial years, such as the year of hire and the year of termination. In any such year, the allowance is prorated based on the number of whole months out of the year which an individual is employed (the first day of the calendar month which is closer to the date of hire or the date that notice was given, will be used as the basis for this calculation). In the event CME is reimbursed in one year for a course in the following year, the CME allowance impacted is that of the year in which the reimbursement took place (not the year the course is attended). Any unused CME allowance will be forfeited as of the end of the calendar year.

Usage at End of Employment

Once notice has been given, CME allowance will no longer be available for use and any scheduled CME reimbursement for courses taking place either during the notice period or after separation from employment must be fully repaid to the Company through a check, future expense or payroll deduction prior to separation. Similarly, if the provider has received

reimbursement in an amount greater than their pro rata entitlement (calculated from the beginning of the year through notice date), any overage must be fully repaid to the Company through a check, future expense or payroll deduction prior to separation. Further, any CME course scheduled during a notice period may not be attended on company time (paid or unpaid).

Course or conference registrations need to be pre-approved by a Director of Operations, Medical Director, RMD, or COO prior to scheduling the course.

Authorization and Responsibility

CME reimbursements must be approved by an authorized individual. Providers should submit a completed expense report itemizing the related transactions along with all the supporting receipts and evidence of payment through Concur. Please ensure supporting documentation is legible for processing and includes itemized receipts including the date the CME expense was incurred.

Requests made without supporting receipts or evidence of payment will not be released for payment until the necessary components are received.

Designated approval authorities are required to review expenditures and withhold reimbursement if there is reason to believe that the expenditures are inappropriate or extravagant.

Licensure Reimbursement (outside of CME)

Adfinitas Health will reimburse all full-time employees for the costs of getting and maintaining a medical license, CDS certification, and DEA certification within the state(s) they are providing service under an Adfinitas Agreement. These expenses are considered a cost to the company and are not limited to an annual allowance (i.e., fully reimbursable by Adfinitas Health). Reimbursement requests for these expenses should be submitted in the same manner as noted in the CME “Authorization and Responsibility” section above.

Business Travel Expenses

Adfinitas will reimburse employees for reasonable business travel expenses incurred while on assignments away from the normal work location. All business travel must be approved in advance by the employee’s supervisor or manager.

Employees whose travel plans have been approved are responsible for making their own travel arrangements.

When approved, the actual costs of travel, meals, lodging, and other expenses directly related

to accomplishing business travel objectives will be reimbursed by Adfinitas. Employees are expected to limit expenses to reasonable amounts. Mileage will be reimbursed at the current IRS mileage reimbursement rate.

Expenses that generally will be reimbursed include the following:

- Airfare or train fare for travel in coach or economy class or the lowest available fare.
- Car rental fees, only for compact or mid-sized cars.
- Fares for shuttle or airport bus service, where available; costs of public transportation for other ground travel.
- Taxi fares, only when there is no less expensive alternative.
- Cost of standard accommodations in low to mid-priced hotels, motels, or similar lodgings.
- Cost of meals, no more lavish than would be eaten at the employee's own expense.
- Tips not exceeding 15% of the total cost of a meal or 10% of a taxi fare.
- Charges for telephone calls, fax, and similar services required for business purposes.
- Cost of long-term or equivalent airport parking.
- Parking at work sites or hotels when required for business purposes.

Employees who are involved in an accident while traveling on business must promptly report the incident to their immediate supervisor. Vehicles owned, leased, or rented by Adfinitas may not be used for personal use without prior approval.

When travel is completed, employees should submit completed travel expense reports within 30 days. Reports should be accompanied by receipts for all individual expenses.

Employees should contact their supervisor for guidance and assistance on procedures related to travel arrangements, expense reports, reimbursement for specific expenses, or any other business travel issues.

IV. WORK CONDITIONS & HOURS

Hours of Operation/Work Schedules/Flextime

Staffing needs and operational demands may necessitate variations in starting and ending times, as well as variations in the total hours that may be scheduled each day and week. Exempt employee schedules are generally specified in employment contracts and modified at the discretion of the program lead/supervisor. Supervisors will advise employees of the times their schedules will normally begin and end.

Flexible scheduling, or flextime, is available in some cases to allow employees to vary their starting and ending times each day within established limits. Flextime may be possible depending upon staffing needs, operational considerations, the employee's performance, and the nature of the job. At no time is flextime guaranteed and once granted, may be changed or revoked. Employees interested in flextime should consult their supervisor to get additional information.

Rest and Meal Periods

Each workday, non-clinical, full-time, non-exempt employees are provided with two rest periods of 15 minutes in length. 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 work stations beyond the allotted rest period time. Employees must check out/check in with their immediate supervisor.

All full-time, non-clinical, non-exempt employees who are scheduled to work more than five (5) hours in a workday are also provided with one meal period of 30 minutes in length. Supervisors may schedule meal periods to accommodate the department's operating requirements. Employees will be relieved of all active responsibilities and restrictions during meal periods and will not be compensated for that time. If for any reason an employee does not take the applicable meal and rest periods, the employee must notify their supervisor immediately.

If the employee intends to leave the premises during the workday, the employee must clock out.

Workers' Compensation Insurance

Adfinitas provides a comprehensive workers' compensation insurance program at no cost to employees. This program covers any injury or illness sustained during employment that requires medical, surgical, or hospital treatment. Subject to applicable legal requirements, workers' compensation insurance provides benefits after a short waiting period or, if the employee is hospitalized, immediately.

Employees who sustain work-related injuries or illnesses should inform their supervisor immediately. No matter how minor an on-the-job injury may appear, it is important that it be reported immediately. This will enable an eligible employee to qualify for coverage as quickly as possible.

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

Safety

To assist in providing a safe and healthful work environment for employees, customers, and visitors, Adfinitas has established a workplace safety program. This program is a top priority for Adfinitas. The Human Resources Department has responsibility for implementing, administering, monitoring, and evaluating the safety program. Its success depends on the alertness and personal commitment of all.



Adfinitas, 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.

Some of the best safety improvement ideas come from employees. Those with ideas, concerns, or suggestions for improved safety in the workplace are encouraged to raise them with their supervisor, or with another supervisor or manager, or bring them to the attention of a member of the Human Resources department. All reports can be made without fear of reprisal.

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.

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

Emergency Conditions

At times, emergencies such as severe weather, blizzards, fires, power failures, or earthquakes, can disrupt Company operations. In extreme cases, these circumstances may require the closing of our corporate office. If such an emergency occurs during nonworking hours, the Company will contact the employee directly to alert them of the closing via email and the employee will be responsible for calling the Company's Weather Line (443-949-0814 ext. 359).

If the decision is made to close the corporate office AFTER the workday has begun, employees will receive official notification from their immediate supervisor.

Non-exempt employees may use available PTO or coordinate remote working options with their supervisor.

Visitors in the Workplace

To provide for the safety and security of employees and the facilities at Adfinitas only authorized visitors are allowed in the workplace. Authorized visitors will be escorted to their destination. Employees are responsible for the conduct and safety of their visitors. If an unauthorized individual is observed on Adfinitas premises, employees should immediately notify their supervisor or, if necessary, direct the individual to the Human Resources Department.

Fraud Reporting – Medicare Fraud

If an employee or contractor is aware of incidents, issues, or concerns of fraud they should report them right away. While reporting them to management is preferred, an anonymous reporting mechanism is provided. You can report fraud by going to www.fraudhl.com or calling or faxing 1-855-FRAUD-HL. Put ADFINITAS as the Company ID.

The Company prohibits retaliation of any kind against individuals who have made good faith reports or complaints of violations of suspected illegal or unethical conduct

Immigration Law Compliance

The Company is committed to employing only persons 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.

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, or reprisal.

V. EMPLOYEE CONDUCT AND CORRECTIVE ACTION

General Standards of Conduct

General standards of conduct exist to ensure orderly operation and provide the best possible work environment. Failure to abide by these rules may result in corrective action, up to and including termination.

Adfinitas's standards include the following:

- Strive for professional excellence
- Understand and support Adfinitas's mission and overall direction
- Provide superior service to all customers and employees, treating all individuals with dignity and respect
- Be flexible, innovative, and responsive to change
- Manage human and financial resources wisely
- Encourage open communication throughout the company

Business Ethics and Conduct

The successful business operation and reputation of Adfinitas is built upon the principles of fair dealing and ethical conduct of our employees. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

The continued success of Adfinitas is dependent upon our customers' trust and we are dedicated to preserving that trust. Employees owe a duty to Adfinitas its customers, and shareholders to act in a way that will merit the continued trust and confidence of the public.

Adfinitas will comply with all applicable laws and regulations and expects its directors, officers, and employees to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.

In general, the use of good judgment, based on high ethical principles, will guide you with respect to lines of acceptable conduct. If a situation arises where it is difficult to determine the proper course of action, the matter should be discussed openly with your immediate supervisor. If necessary, the situation may also be discussed with the Human Resources Department for advice and consultation.

Compliance with this policy of business ethics and conduct is the responsibility of every Adfinitas employee.

HIPAA Privacy Policy and Sanctions

Adfinitas Health will ensure that all members of its workforce including all clinical, administrative, support and contracted staff comply with all security policies of the organization as well as state and federal regulation such as HIPAA by applying sanction and disciplinary actions appropriate for the breach of policy. This practice will enable application of general principles that will lead to fair and consistent outcomes.

PHI is individually identifiable information (oral, written, or electronic) about a patient's physical or mental health, the receipt of health care, or payment for that care. PHI includes, but is not limited to, individually identifiable demographic information, such as name, date of birth, address, Social Security Number; financial information, such as account number security code, information from or about transactions, financial or credit account numbers; and other personal identifiers, such as driver's license number, phone numbers, ISP and Internet domain addresses.

How Encrypt Emails Containing PHI

Whether sending an email to another Adfinitas account, to an outside email account, from your desktop, mobile phone, or iPad, you simply include "phi" or "PHI" in the subject line of the email and the email will automatically encrypt. Please be sure to not add any letters or

symbols to the beginning or end of “phi” or “PHI” as that will result in a failure to encrypt. Also – the contents of the subject line DO NOT get encrypted (only the contents of the text in the email) do DO NOT put any PHI information into the subject line.

- Example of failed subject line: PHI: patient on 3A
 - The colon after PHI causes the system to not read PHI as a stand-alone word and the email will not encrypt.
- Example of successful subject line: PHI patient on 3A
 - Since there are spaces before and after PHI, the system recognizes PHI as a stand-alone word and will encrypt.

Should you have any questions or concerns about this process, please reach out to Chris Allison at Netacom (helpdesk@netacom.com or 1-888-638-2266).

Violation of a patient’s or employee’s or other person’s privacy include but are not limited to the following examples:

- The HIPAA Privacy Rule involving patient’s protected health information which may or may not result in a notifiable breach
- Medical ID Theft or Insurance Fraud
- Misuse of Personally Identifiable Information (PII) such as employee information

Investigation Procedure

A workforce member who is reported for a violation of Privacy such as HIPAA, will be interviewed by the a member of Human Resources, to investigate any instance of a privacy or security violation that has been reported.

If a Privacy violation is substantiated following investigation, Human Resources and the employee’s manager will issue a corrective action for the workforce member, based on the incident severity level and employee documented performance and corrective action history.

Sanctions

Adfinitas Health applies appropriate sanctions in the form of corrective action, up to and including termination of employment/services, against workforce members for violations of Privacy such as HIPAA. Adfinitas Health workforce members who fail to comply with this policy are subject to corrective action, up to and including termination.

Severity Levels of Violations

- A. **Level 1 – Low Risk:** An individual inadvertently or mistakenly accesses, uses or discloses PHI or PII that he/she had no need to know in order to carry out his/her responsibilities for Adfinitas Health, or carelessly accesses or discloses information to which he/she has authorized access. Examples of level 1 Privacy violations include, but are not limited to, the following:
- Leaving PHI in a public area within the covered entity;
 - Mistakenly sending e-mails or faxes containing PHI / PII to the wrong recipient;
 - Discussing PHI / PII in public areas where it can be overhead, such as elevators, cafeteria, restaurants, hallways, etc.;
 - Leaving personal workstation with a computer accessible and unattended with PHI visible;
 - Improperly disposes of PHI / PII in violation of Privacy regulations;
 - An individual fails to report that his/her password has been potentially compromised (i.e., has responded to e-mail spam and given out their password).
- B. **Level 2 – Moderate Risk:** An individual intentionally accesses, uses or discloses PHI / PII without appropriate authorization. Examples of level 2 Privacy violations include, but are not limited to, the following:
- Intentional, unauthorized access to the person’s friends, relatives, co-workers, public personality’s, or other individual’s PHI / PII (including searching for an address or phone number);
 - Intentionally assisting another individual to gain unauthorized access to PHI / PII. This includes, but is not limited to, giving another individual your unique username and password to access electronic PHI;
 - Disclosing patient condition, status or other PHI obtained as an Adfinitas Health employee to another Adfinitas Health workforce member who does not have a legitimate need to know;
 - Fails to properly verify the identity of individuals requesting PHI / PII which results in inappropriate disclosure, access or use of PHI / PII;
 - Logs into any EMR system and allows another individual to access PHI / PII;
 - Connects devices to the network and/or uploads software without having received authority from Adfinitas Health;
 - Second occurrence of any Level 1 violation (it does not have to be the same offense).

- C. **Level 3 – High Risk:** An individual purposefully uses, accesses and/or discloses PHI / PII without any authorization for personal or financial gain; causes physical or emotional harm to another person; or causes reputational or financial harm to the institution. Examples of level 3 Privacy violations include, but are not limited to, the following:
- Unauthorized intentional disclosure and/or delivery of PHI to anyone;
 - Intentionally assisting another individual to gain unauthorized access to PHI for personal gain. This includes, but is not limited to, giving another employee or non-employed individual your unique username and password to access electronic PHI;
 - Theft of PHI / PII for health or insurance services;
 - Access or uses PHI / PII for personal gain (i.e., lawsuit, marital dispute, custody dispute, ID Theft, insurance fraud);
 - Discloses PHI / PII for financial or other personal gain or malice;
 - Uses, accesses or discloses PHI / PII that results in personal, financial or reputational harm or embarrassment to the patient;
 - Utilizes Adfinitas Health or site-based computing resources, including the network, that are either related to or result in events that are reportable to the FBI;
 - Attempts to penetrate or gain access to the Adfinitas Health or site-based network and/or its resources without appropriate authorization;
 - Second occurrence of any Level 2 violation (it does not have to be the same offense) or multiple occurrences of any Level 1 violation.
 - Threshold of patients or employees or other persons affected - (for example over 500 affected people where media, Office of Civil Rights and law enforcement need to be contacted immediately)

Factors That May Increase the Severity of the Corrective Action

The severity of the corrective action may be increased up to the level of termination if the incident caused greater harm/ risk to the organization, or if the staff member has prior corrective actions.

Examples may include:

- Multiple offenses
- Harm to breach victim(s)
- Breach of specially protected PHI such as HIV-related, psychiatric, substance abuse, and genetic data

- High volume of people or data affected
- High exposure/risk for the institution
- Large organizational expense incurred, such as breach notification
- Hampering the investigation
- Negative influence of actions on others

Factors That May Decrease the Severity of Corrective Action

The severity of the corrective action may be decreased down to the level of coaching/training if it’s determined that the root cause of the Privacy violation occurred due to factors out of the employee’s control.

Examples may include:

- Privacy violation occurred as a result of attempting to assist a patient
- Action was taken under pressure from an individual in a position of authority

Severity Level Table

The corrective action may be determined by multiple factors in addition to the underlying HIPAA / Privacy incident. The chart below chart represents the corrective actions that may be applied with or without additional factors. The severity of corrective action may be decreased or increased up to the level of termination at the discretion of Human Resources and management after taking all factors into consideration.

	Coaching/ Training	First Written Warning	Second Written Warning	Final Written Warning	Termination
Level 1					
Level 2					
Level 3					

-  Corrective Action considered for HIPAA / Privacy incident
-  Corrective Action considered if other factors are applicable

Corrective Action

Adfinitas makes every attempt to ensure that corrective actions are prompt, equitable, and impartial. The major purpose of any corrective action is to address the problem, prevent recurrence, and prepare the employee for satisfactory service in the future.

This policy in no way limits or changes the employment at-will relationship and both the employee and the Company may end the employment relationship at any time, with or without notice or cause.

Leaders are encouraged to have coaching conversations with employees for personal and professional development. Coaching conversations do not need to be addressed in formal documentation; however, leaders are encouraged to follow up in an email identifying the concerns, expectations and any support they will be able to provide. At the point in time a leader begins the formal documentation process, they should do so on the Adfinitas Corrective Action form, available from Human Resources.

The steps for documenting corrective action are progressive in nature and are defined as follows:

First Warning

The purpose of the first warning is to make the employee aware of the Company policy, and the consequences of continued violations.

Second Warning

This warning serves to notify the employee that he or she is in violation of company policy and that additional occurrences will result in further corrective action.

Third Warning

This is an additional warning putting the employee on formal notice of violation as mentioned above and that additional occurrences may result in termination.

Termination

This is considered the final step in the corrective action process.

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

While it is impossible to list every type of behavior that may be deemed a serious offense, some examples of infractions that may result in corrective action are listed below. This is list not all-inclusive:

- Dishonesty, theft, or embezzlement
- Falsification of documents (e.g., employment applications, time sheets)
- Referring business to a direct competitor of Adfinitas
- Disclosing confidential information to a competitor
- Holding a second job which conflicts with position at Adfinitas
- Unauthorized possession of Company records
- Refusal to perform work as required, or any other act perceived as insubordination
- Use or distribution of illegal substances
- Unauthorized consumption of alcohol on Company premises or during working hours
- Conduct that may cause injury to persons or damage to property
- Sleeping on the job
- Workplace Violence and Sexual Harassment

- Discrimination
- Smoking in any Company facility
- Unauthorized presence on Company premises while off duty
- Misuse of Company facilities, equipment, or other property

Attendance and Punctuality

Employees are expected to be at work when scheduled and to arrive on time. All employees are required to be prepared to start their assigned tasks at the beginning of their scheduled work shifts. Employees are also required to return on time from their scheduled meal periods and breaks.

Not reporting to work and not calling to report the absence is a no-call/no-show and is a serious matter, creating increased administrative burdens and operational issues. The first instance of a no-call/no-show will result in a final written warning.

Management may consider extenuating circumstances when determining corrective action process for a no-call/no-show and has the right to exercise discretion in such cases.

Drug Free Workplace

Adfinitas strives to maintain a workplace free of drugs and alcohol and to discourage drug and alcohol abuse by its employees. Misuse of alcohol or drugs by employees can impair the ability of employees to perform their duties, as well as adversely affect our customers and customers' confidence in our company.

Alcohol

Employees are prohibited from using or being under the influence of alcohol while performing company business for Adfinitas while operating a motor vehicle during business or for any job-related purpose, or while on company premises or a worksite.

Alcohol may be stored on site and its use permissible with the direct approval of the CEO or President.

Illegal Drugs

Adfinitas employees are prohibited from using or being under the influence of illegal drugs while performing company business, or while on a company facility or worksite. You may not use, manufacture, distribute, purchase, transfer or possess an illegal drug while in Adfinitas facilities, while operating a motor vehicle for any job-related purpose or while on the job, or while performing company business. This policy does not prohibit the proper use of medication under the direction of a physician; however, misuse of such medications is prohibited.

Drug and Alcohol Testing

Adfinitas may require a blood test, urinalysis, hair test or other drug or alcohol screening of employees suspected of using or being under the influence of drugs or alcohol or where other

circumstances or workplace conditions justify such testing.

Security Inspections

Adfinitas may conduct searches for illegal drugs or alcohol on company facilities or worksites without prior notice to employees. Such searches may be conducted at any time. Employees are expected to cooperate fully.

Searches of employees and their personal property may be conducted when there is reasonable suspicion to believe that the employee has violated this policy or when circumstances or workplace conditions justify such a search. Personal property may include, but is not limited to, purses, boxes, briefcases, as well as any Adfinitas property that is provided for employees' personal use, such as desks, lockers, and files.

Smoke-free Workplace

In keeping with Adfinitas' intent to provide a safe and healthful work environment, smoking is prohibited throughout the workplace and customer locations. This policy applies equally to all employees, customers, and visitors.

Harassment and Violence in the Workplace

Harassment

Adfinitas is committed to providing a work environment that is free from all forms of discrimination and conduct that can be considered harassing, coercive, or disruptive, including sexual harassment. Actions, words, jokes or comments based on an individual's sex, sexual orientation, marital status, gender identity, race, color, national origin, age, religion, disability, or other legally protected characteristic will not be tolerated.

Harassment is unwelcome verbal, visual or physical conduct creating an intimidating, offensive, or hostile work environment that interferes with work performance.

Examples of harassment may include:

- Verbal (such as jokes, slurs, insults, epithets, or teasing)
- Graphic (such as offensive postures, symbols, cartoons, drawings, computer displays or e-mail)
- Physical (such as touching, gestures, physically threatening another person, blocking someone's way, etc.)
- Conduct that denigrates or shows hostility or aversions toward an individual because of any characteristic protected under Title VII of the Civil Rights Act of 1964.

Sexual harassment is defined as unwanted sexual advances, or visual, verbal or physical conduct of a sexual nature. Sexual harassment includes harassment by a person of the same,

or opposite, sex as the victim. Examples of sexual harassment may include, but are not limited to:

- Unwanted sexual advances;
- Offering employment benefits in exchange for sexual favors;
- Making or threatening reprisals after a negative response to sexual advances;
- Visual conduct that includes leering, making sexual gestures or displaying sexually suggestive objects, pictures, cartoons, calendars or posters;
- Inappropriate or excessive touching or hugging;
- Verbal abuse of a sexual nature, graphic commentaries about an individual's body or desired sexual activities and sexually degrading words towards an individual.

If you experience or witness sexual or other harassment in the workplace, employees are encouraged to have a direct conversation with the offender. If you do not feel comfortable contacting that person, then report it to your supervisor or Human Resources.

The Company will investigate all allegations of harassment promptly and discreetly. To the extent possible, your confidentiality and that of any witnesses and the alleged harasser will be protected against unnecessary disclosure. When the investigation is completed, you will be informed of the outcome of the investigation.

Adfinitas prohibits any form of retaliation for reporting in good faith any incidents of harassment in violation of this policy, pursuing any such claim or cooperating in the investigation of such reports.

Weapons

Adfinitas strictly prohibits employees from bringing any guns, licensed or unlicensed, knives, or other weapons onto any company premises, or into any company facility, or any related customer facilities.

To promote a safe, productive, and efficient workplace, Adfinitas reserves the right to inspect any articles and property in an employee's possession or on an employee's person, to detect guns or other weapons. Adfinitas also reserves the right to inspect lockers, desks, company vehicles, personal vehicles on company property, packages, lunch boxes, backpacks, purses, containers, articles of clothing, and other objects brought onto company property that might conceal guns or other weapons.

Acts of Violence

Adfinitas strives to maintain a productive work environment free of violence and the threat of violence. We are committed to the safety of our employees, vendors, customers and visitors.

Adfinitas does not tolerate any type of workplace violence committed by or against employees. Any threats or acts of violence against an employee, vendor customer, visitor or property will not be tolerated. Where appropriate, Adfinitas will report violent incidents to local law enforcement authorities.

A violent act or threat of violence is defined as any direct or indirect action or behavior that could be interpreted, considering known facts, circumstances and information, by a reasonable person, as indicating the potential for or intent to harm, endanger or inflict pain or injury on any person or property.

Hiring Relatives and Personal Relationships in the Workplace

The employment of relatives or individuals involved in a dating relationship in the same area of an organization may cause serious conflicts and problems with favoritism and employee morale. In addition to claims of partiality in treatment at work, personal conflicts from outside the work environment can be carried over into day-to-day working relationships.

For purposes of this policy, a relative is 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. A dating relationship is defined as a relationship that may be reasonably expected to lead to the formation of a consensual “romantic” or sexual relationship. This policy applies to all employees without regard to the gender or sexual orientation of the individuals involved.

Relatives of current employees may not occupy a position that will be working directly for or supervising their relative. Individuals involved in a dating relationship with a current employee may also not occupy a position that will be working directly for or supervising the employee with whom they are involved in a dating relationship. Adfinitas also reserves the right to take prompt action if an actual or potential conflict of interest arises involving relatives or individuals involved in a dating relationship who occupy positions at any level (higher or lower) in the same line of authority that may affect the review of employment decisions.

If a relative relationship or dating relationship is established after employment between employees who are in a reporting situation described above, it is the responsibility and obligation of the supervisor involved in the relationship to disclose the existence of the relationship to management. The individuals concerned will be given the opportunity to decide who is to be transferred to another available position. If that decision is not made within 30 calendar days, management will decide who is to be transferred or, if necessary, terminated from employment.

In other cases, where a conflict or the potential for conflict arises because of the relationship between employees, even if there is no line of authority or reporting involved, the employees may be separated by reassignment or terminated from employment.

Confidential Information/Non-Disclosure

All Adfinitas records and information about Adfinitas, its employees, customers, suppliers, and vendors are to be kept confidential and divulged only to individuals within the company with both a need to receive and authorization to receive the information.

All records and files maintained by the company are confidential and remain the property of the company. No records, files or related information may be removed from Adfinitas' premises or disclosed to any outside party without the express permission from Adfinitas. Confidential information regarding Adfinitas, includes, but is not limited to, financial records, business, marketing, and strategic plans, Human Resources and payroll records regarding current and former employees, the identity of, contact information for, and any other account information on customers, vendors and suppliers, inventions, programs, trade secrets, formulas, techniques and processes, and any other documents or information regarding the company's operations, procedures or practices. Additionally, the contents of Adfinitas' records or information otherwise obtained regarding business may not be disclosed to anyone, except where required for a business purpose.

Employees must not disclose any confidential information to any unauthorized person inside, or outside the company. Employees who are unsure about the confidential nature of specific information must ask their supervisor or human resources for clarification. The company reserves the right to avail itself of all legal or equitable remedies to prevent impermissible use of confidential information or to recover damages incurred because of the impermissible use of confidential information. Employees may be required to enter written confidentiality agreements confirming their understanding of the company's confidentiality policies.

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

- Computer processes
- Computer programs and codes
- Customer lists
- Customer preferences
- Financial and compensation information
- Labor relations strategies
- Sales and marketing strategies
- Recruitment strategies
- Staffing models
- Employee lists
- New materials research
- Pending projects and proposals
- Proprietary production processes
- Research and development strategies
- Scientific data
- Scientific formulae
- Scientific prototypes
- Technological data

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

Conflict of Interest

Adfinitas's continued success depends upon the undivided loyalty of its employees throughout their employment. To maintain its reputation and the relationships it has developed with outside companies and individuals, Adfinitas requires the following commitments from all its

employees.

Every Adfinitas employee has a legal and ethical responsibility to promote Adfinitas's best interests. No employee may engage in any conduct or activity that is inconsistent with Adfinitas's best interests or that in any fashion disrupts, undermines, or impairs Adfinitas's relationships with any customer or prospective customer or any outside organization, person or entity with which Adfinitas has or proposes to enter an arrangement, agreement, or contractual relationship of any kind.

Adfinitas requires the complete commitment of all full-time employees. Such employees may not engage in any outside activity or accept work in any outside position that either interferes with their ability to devote their full and best efforts to Adfinitas or raises an actual or potential conflict of interest or the possible appearance of a conflict of interest. Employees who have any questions whatsoever regarding this policy or the potential impact of outside activities on their position with Adfinitas should contact the Director of Human Resources before accepting any outside position or engaging in any such activity.

Transactions with outside firms must be conducted within a framework established and controlled by the executive level of Adfinitas. Business dealings with outside firms should not result in unusual gains for those firms. Unusual gain refers to bribes, product bonuses, special fringe benefits, unusual price breaks, and other windfalls designed to ultimately benefit, the employer, the employee or both. Promotional plans that could be interpreted to involve unusual gain require specific executive-level approval.

Social Media Policy

Social media includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else's web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or a chat room, whether or not associated or affiliated with Adfinitas, as well as any other form of electronic communication. The same principles and guidelines found in Adfinitas policies, and three basic beliefs apply to your activities online. Ultimately, you are solely responsible for what you post online. Before creating online content, consider some of the risks and rewards that are involved.

Know and follow the rules

Carefully read the guidelines of this handbook, specifically the Adfinitas General Standards of Conduct, the Harassment and Violence in the Workplace, and the Computer Email and Internet Usage sections, and ensure your postings are consistent with these policies. Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated.

Be respectful

Adfinitas has processes to resolve conflicts, so we advise against publicly disparaging

comments regarding fellow associates, customers, members, suppliers or people who work on behalf of Adfinitas. Nevertheless, if you decide to post complaints or criticism, avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating, that disparage customers, members, associates or suppliers, or that might constitute harassment or bullying. Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion or any other status protected by law or company policy.

Be honest and accurate

Honesty and accuracy is highly important. Consider the source before posting any information or rumors that you have not been able to verify about Adfinitas, fellow associates, members, customers, suppliers, people working on behalf of Adfinitas, or competitors.

Proprietary content

Maintain the confidentiality of Adfinitas trade secrets and private or confidential information. Trades secrets may include information regarding the development processes, services, partners and customers. Do not post internal reports, policies, procedures or other internal business-related confidential communications.

Respect HIPAA regulations and patient privacy laws. The Privacy Rule standards address the use and disclosure of individuals' health information by organizations subject to the Privacy Rule, as well as standards for individuals' privacy rights to understand and control how their health information is used.

Express only your personal opinions. Never represent yourself as a spokesperson for Adfinitas. If Adfinitas is a subject of the content you are creating, be clear and open about the fact that you are an associate and make it clear that your views do not represent those of Adfinitas, fellow associates, members, customers, suppliers or people working on behalf of Adfinitas. If you do publish a blog or post online related to the work you do, or subjects associated with Adfinitas, make it clear that you are not speaking on behalf of Adfinitas. It is best to include a disclaimer such as "The postings on this site are my own and do not necessarily reflect the views of Adfinitas."

Customer Service

Customers are among our organization's most valuable assets. Every employee represents Adfinitas to our customers and the public. The way we do our jobs presents an image of our entire organization. Customers judge all of us by how they are treated with each employee contact. Therefore, one of our first business priorities is to assist any customer or potential customer. Nothing is more important than being courteous, friendly, helpful, and prompt in the attention you give to customers.

Adfinitas will provide customer relations and services training to all employees with extensive customer contact. Our personal contact with the public, our manners on the telephone, and the communications we send to customers are a reflection not only of ourselves, but also of the professionalism of Adfinitas. Positive customer relations not only enhance the public's perception or image of Adfinitas but also pay off in greater customer loyalty and increased sales and profit.

Dress Code/Personal Appearance

Adfinitas strives to maintain a workplace environment that is well functioning and free from unnecessary distractions and annoyances. As part of that effort, the company requires employees to maintain a neat and clean appearance that is appropriate for the workplace setting and for the work being performed. To that end, Adfinitas department leaders may determine and enforce guidelines for workplace-appropriate attire and grooming for their areas.

Procedures

All Adfinitas staff members are expected to present a professional, businesslike image to clients, visitors, customers and the public. Acceptable personal appearance, like proper maintenance of work areas, is an ongoing requirement of employment with Adfinitas.

Supervisors should communicate any department-specific workplace attire and grooming guidelines to staff members during new-hire orientation and evaluation periods. Any questions about the department's guidelines for attire should be discussed with the immediate supervisor.

Any staff member who does not meet the attire or grooming standards set by their department will be subject to corrective action and may be asked to leave the premises to change clothing. Hourly paid staff members will not be compensated for any work time missed because of failure to comply with designated workplace attire and grooming standards.

Tattoos and Piercings

Adfinitas prohibits any tattoo, facial and body piercing that is not consistent with the organization's branding, image, values or mission. Employees will be required to cover tattoos and piercings during initial contact with new providers, or designated business attire days. Any tattoo that may be considered representative of any criminal activity, historically oppressive organization, sexually explicit, profane language, or promotion of illegal drug use, must be covered at all times.

Business casual

Business casual dress will be permitted most days, except during specified and announced periods when business attire will be expected. Employees who must leave work to change clothes for business reasons will use personal time or vacation time to do so. When meeting

clients, business dress guidelines must be observed, unless the client has specifically requested otherwise. Casual attire, such as jeans and jerseys, will be allowed at the discretion of leadership.

Business Casual attire is defined as follows:

- Casual shirts: All shirts with collars, business casual crewneck or V-neck shirts, blouses, golf and polo shirts. Examples of inappropriate shirts include T-shirts, shirts with inappropriate slogans, tank tops, muscle shirts, and crop tops. Sports Jerseys and T-shirts may be approved for specific events only.
- Pants: Casual slacks and trousers. Examples of inappropriate pants include shorts, military working uniforms, and pants worn below the waist or hip line.
- Footwear: Casual slip-on or tie shoes, dress sandals with heel straps, and boots. Examples of inappropriate footwear include floppy sandals, flip-flops, construction, or hunting boots.

Formal Business attire

The following guidelines apply to formal business attire:

- For men, business attire includes a long-sleeved dress shirt, tie, tailored sport coat worn with trousers and dress shoes.
- For women, business attire includes tailored pantsuits, businesslike dresses, coordinated dress separates worn with or without a blazer, and conservative shoes (i.e. pumps and flats).

Specific requirements

Certain staff members may be required to meet special dress, grooming and hygiene standards, such as wearing uniforms or protective clothing, depending on the nature of their job. Uniforms and protective clothing may be required for certain positions and will be provided to employees by Adfinitas.

At the discretion of the department head, in special circumstances, such as during unusually hot or cold weather or during special occasions, staff members may be permitted to dress in a more casual fashion than is normally required. On these occasions, staff members are still expected to present a neat appearance and are not permitted to wear ripped, frayed or disheveled clothing or athletic wear. Likewise, tight, revealing or otherwise workplace-inappropriate dress is not permitted.

Reasonable accommodation of religious beliefs

Adfinitas recognizes the importance of individually held religious beliefs to persons within its workforce. Adfinitas will reasonably accommodate a staff member's religious beliefs in terms of workplace attire unless the accommodation creates an undue hardship. Accommodation of religious beliefs in terms of attire may be difficult in light of safety issues for staff members.

Those requesting a workplace attire accommodation based on religious beliefs should be referred to the human resource (HR) department.

Computer, Email and Internet Usage

Adfinitas recognizes that use of the Internet has many benefits for Adfinitas and its employees. The Internet and e-mail make communication more efficient and effective. Therefore, employees are encouraged to use the Internet appropriately. Unacceptable usage of the Internet can place Adfinitas and others at risk. This policy discusses acceptable usage of the Internet.

The following guidelines have been established for using the Internet and e-mail in an appropriate, ethical and professional manner.

All Internet data and e-mails that are composed, transmitted or received via the Company's computer communications systems are considered part of the official records of Adfinitas and as such, is subject to disclosure to law enforcement and third parties. Employees should always ensure that the business information contained in Internet e-mail messages and other transmissions is accurate, appropriate, ethical and lawful.

Adfinitas internet and e-mail access may not be used for transmitting, retrieving or storing of any communications of a defamatory, discriminatory or harassing nature or materials that are obscene or X-rated. No messages with derogatory or inflammatory remarks about an individual's race, age, disability, religion, national origin, physical attributes or sexual preference shall be transmitted. Harassment of any kind is strictly prohibited. Disparaging, abusive, profane, or offensive language; materials that would adversely or negatively reflect upon Adfinitas or be contrary to Adfinitas best interests; and any illegal activities -- including piracy, cracking, extortion, blackmail, copyright infringement, and unauthorized access to any computers on the Internet or email, are forbidden.

Copyrighted materials belonging to entities other than Adfinitas may not be transmitted by employees on the company's network. All employees obtaining access to other companies' or individual's materials must respect all copyrights and may not copy, retrieve, modify or forward copyrighted materials, except with permission or as a single copy to reference only. If you find something on the Internet that may be interesting to others, do not copy it to a network drive. Instead, give the URL (uniform resource locator or "address") to the person who may be interested in the information and have that person look at it on his/her own.

Do not use the system in a way that disrupts its use by others. This includes excessive dial-in usage, sending or receiving many large files and "spamming" (sending e-mail messages to thousands of users.) The Internet is full of useful programs that can be downloaded, but some of them may contain computer viruses that can extensively damage our computers. Be sure to virus-check downloaded files immediately. Instructions on how to check for viruses are available through the IT Department. Also, many browser add-on packages (called "plug-ins") are available to download. There is no guarantee that such will be compatible with other

programs on the network, and such may cause problems; therefore, please refrain from downloading such plug-ins.

Each employee is responsible for the content of all text, audio or images that he/she places or sends over the company's Internet and e-mail system. No e-mail or other electronic communications may be sent which hides the identity of the sender or represents the sender as someone else. Also, be aware that Adfinitas's name is attached to all messages so use discretion in formulating messages.

E-mail is not guaranteed to be private or confidential. All electronic communications are Adfinitas property. Therefore, Adfinitas reserves the right to examine, monitor and regulate e-mail messages, directories, and files, as well as Internet usage. Also, the Internet is not secure so don't assume that others cannot read -- or possibly alter -- your messages.

Internal and external e-mail messages are considered business records and may be subject to discovery in the event of litigation. Be aware of this possibility when sending e-mail within and outside the Company.

The following behaviors are examples of actions and activities that are prohibited and can result in disciplinary action:

- Sending or posting discriminatory, harassing, or threatening messages or images
- Using the organization's time and resources for personal gain
- Stealing, using, or disclosing some else's code or password without authorization
- Copying, pirating, or downloading software and electronic files without permission
- Sending or posting confidential material, trade secrets or proprietary information outside of the organization
- Violating copyright law
- Failing to observe licensing agreements
- Engaging in unauthorized transactions that may incur a cost to the organization or initiate unwanted Internet services or transmissions
- Sending or posting messages or material that could damage the organization's image or reputation
- Participating in the viewing or exchange of pornography or obscene materials
- Sending or posting messages that defame or slander other individuals
- Attempting to break into the computer system of another organization or person
- Refusing to cooperate with a security investigation
- Sending or posting chain letters, solicitations or advertisements not related to business purposes or activities
- Using the Internet for political causes or activities, religious activities, or any sort of gambling
- Jeopardizing the security of the organization's electronic communications systems
- Sending or posting messages that disparage another organization's products or services

- Passing off personal views as representing those of the organization
- Sending anonymous e-mail messages
- Engaging in any other illegal activities

Right to Monitor and Consequences

All Company-supplied technology, including computer systems and company-related work records, belong to Adfinitas and not the employee. Adfinitas routinely monitors usage patterns for its e-mail and Internet communications. Although encouraged to explore the vast resources available on the Internet, employees should use discretion in the sites that are accessed. Since all the computer systems and software, as well as the e-mail and Internet connection, are Adfinitas owned, all company policies are in effect at all times. Any employee who abuses the privilege of Adfinitas facilitated access to e-mail or the Internet, may be denied access to the Internet.

Use of Phone and Mail Systems

Personal use of the telephone for long-distance and toll calls is not permitted. Employees should practice discretion when making local personal calls and may be required to reimburse Adfinitas for any charges resulting from their personal use of the telephone. Personal cell phones may only be used during employee breaks and meal periods and must be turned off or on vibrate so as not to disturb others in the workplace.

The mail system is reserved for business purposes only. You are not permitted to use Company-paid postage for personal correspondence. Employees should refrain from sending or receiving personal mail at the workplace. All mail delivered to the company is presumed to be related to company business. Mail sent to you at the company will be opened by the office and routed to your department. If you do not wish to have your correspondence handled in this manner, please have it delivered to your home.

To ensure effective telephone communications, employees should always use the approved greeting and speak in a courteous and professional manner. Please confirm information received from the caller and hang up only after the caller has done so.

Use of Cell Phone for Business Purposes While Driving

Employees must adhere to all federal, state, or local rules and regulations regarding the use of cell phones while driving. The use of a cell phone while driving may present a hazard to the driver, other employees, and the general public. Therefore, employees should not use handheld cell phones for business purposes while driving. In the case where an employee needs to make a business call while driving, he/she should locate a lawfully designated area to park and make the call. This policy is meant to ensure the safe operation of company vehicles and the operation of private vehicles while an employee is on work time and conducting business.

Use of Personal Communication Devices

The use of personal communication devices shall be limited in the workplace to alleviate

distractions and the disruption of regular work routines. Personal communication devices are defined as, but not limited to, cellular or two-way phones, and audible pagers. Personal communication devices are prohibited from use during work hours and in work areas unless the company has provided such device(s) to the employee for business use only. Any employee carrying a non-company issued personal communication devices with an audible alarm or ring must ensure the sound is turned off during work hours and in work areas. Employees must not take, return, or receive calls on personally owned communication devices during work hours or in work areas.

Limited and temporary exceptions to this policy permitting the use of personally owned communications devices for ongoing personal emergency situations (such as the imminent birth of a child) may be made. Please contact supervisor to make arrangements for the use of personal communication devices at such times.

Use of Equipment and Vehicles

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

If any equipment, machines, tools or vehicles appear to be or become damaged, defective or in need of repair, do not use the item and contact your supervisor immediately. Prompt reporting of damages, defects and the need for repairs could prevent deterioration of equipment and possible injury to employees or others. Your supervisor can answer any questions about your responsibility for maintenance and care of equipment or vehicles used on the job.

VI. CAREER DEVELOPMENT

Job and Performance Evaluation

The integration and interdependency of four key aspects of education defines the Adfinitas educational strategy: Clearly defined educational plans, supported by relevant resources, facilitated by assessments and directed faculty development. Learning must always result in improved clinical performance, and it is important that quality education harnesses teaching methods appropriate to desired outcomes. Learning can be viewed as a progression of knowledge as it is assimilated into practice.

Supervisors and employees are strongly encouraged to discuss job performance and goals on an informal, day-to-day basis. A formal written performance evaluation will be conducted at the end of an employee's initial period of hire, known as the introductory period.

All Clinical and Administrative staff will have their job performance evaluated on an annual basis on a schedule to be determined by Human Resources. The purposes for the annual

performance appraisal include but are not limited to the following:

- To align the responsibilities of each job with the mission of Adfinitas and the mission of the employee's department.
- To encourage open communication between the supervisor and their staff.
- To document employee growth and development needs as well as achievements.
- To support analysis and decisions related to staffing, compensation and training.

Fundamentally, the appraisal is designed to serve as a tool that helps supervisors increase productivity, communicate expectations, establish goals, and report the employee's success in meeting past performance expectations. In its most productive form, the performance appraisal is continuous practice of exchanging information between the supervisor and employee that begins and ends with the formal performance appraisal meeting.

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.

Merit based pay adjustments may be awarded in conjunction with superior employee performance documented by the performance evaluation process.

Job descriptions

A job description describes the essential functions and the basic responsibilities of an employee's position.

It is the responsibility of the employee to discuss any aspects of their job description and duties which are not clear to them with their supervisor. The Company reserves the right at any time to change or modify the position or the job description of an employee.

Job Posting and Employee Referrals

Adfinitas encourages employees to identify friends or acquaintances who are interested in employment opportunities and refer qualified outside applicants for posted jobs. Employees should obtain permission from the individual before making a referral, share their knowledge of the organization, and not make commitments or oral promises of employment.

An employee should submit the referral's resume and/or completed application form to the Recruiting Department for a posted job. 50% of the referral bonus will be paid upon the candidate completing the employment process and completing 90-days of employment and 50% will be paid out after 6 months of employment. The amount of the bonus will be determined at the time the employee becomes eligible to receive the bonus. Please refer to the Employee Referral Bonus Program (posted on the Employee Portal) for the exact terms

and conditions.

VII. ADDITIONAL INFORMATION

Workplace Monitoring

Workplace monitoring may be conducted by Adfinitas to ensure quality control, employee safety, security, and customer satisfaction.

Employees who regularly communicate with customers may have their telephone conversations monitored or recorded. Telephone monitoring is used to identify and correct performance problems through targeted training.

Improved job performance enhances our customers' image of Adfinitas as well as their satisfaction with our service.

Computers furnished to employees are the property of Adfinitas. As such, computer usage and files may be monitored or accessed.

Adfinitas may conduct video surveillance of non-private workplace areas. Video monitoring is used to identify safety concerns, maintain quality control, detect theft and misconduct, and discourage or prevent acts of harassment and workplace violence.

Because Adfinitas is sensitive to the legitimate privacy rights of employees, every effort will be made to guarantee that workplace monitoring is done in an ethical and respectful manner.

Bulletin Boards

Bulletin boards contain important Company information and policies such as employment law posters. Management must approve all postings on the bulletin boards. Please see Human Resources to obtain approval for bulletin board posting.

Solicitation and Distribution of Literature

Solicitation and distribution of literature in the workplace can be disruptive and interfere with work. To avoid disruption to and interference with Adfinitas's operations, the following rules regarding solicitation and distribution of literature have been established and will be strictly enforced:

- Non-employees may not solicit or distribute literature on any premises at any time for any purpose.
- Employees may not solicit or distribute literature during working time for any purpose. (Working time does not include lunch periods, work breaks or any

- other periods in which employees are not on duty.)
- Employees may not distribute literature at any time in working areas.
 - Employees may not use Company equipment or systems, including but not limited to computers, e-mail, telephones, voice-mail, copiers, and fax machines to prepare, send or receive solicitation or literature.
 - Employees may not post any literature, articles or solicitations on Company bulletin boards without prior express approval of management.

Violation of this policy may result in disciplinary action, up to and including termination.

Problem Solving Process

Adfinitas strives to be attentive and responsive to its employees' concerns. The process set forth below will be used to try to resolve specific work-related problems or complaints that employees may have. Management's goal is to maintain a harmonious, productive work relationship with each employee.

This problems-solving process was developed to give employees a systematic way to resolve specific work-related problems or complaints, such as:

- Disagreement with the interpretation or application of Company policies
- Disagreement with an employment decision regarding the administration of employee benefits or conditions of employment (for example, scheduling, promotions, training, or vacations)
- Treatment considered unfair by an employee (for example, coercion, reprisal, or intimidation)
- Alleged discrimination in any form (for example, race, color, religion, sex, sexual orientation, marital status, gender identity, age, national origin, or disability)

Any employee may use this problem-solving process. Employees will not be penalized or retaliated against for bringing their work-related problems or complaints to management's attention.

Employees must not abuse the problem-solving process by raising issues in bad faith or solely for the purpose of delay or harassment, or by repeatedly raising issues that a reasonable person would judge to have no merit.

Implementation of the problem-solving process by an employee does not limit the right of the Company to impose any disciplinary action that is not in retaliation for using the problem-solving process.

If an employee has a work-related problem or complaint, he or she should promptly discuss it with their supervisor. If the employee is not comfortable discussing the problem or complaint with their supervisor, the employee may discuss the situation with another supervisor in the same department or go directly to the department manager. If the employee is not comfortable

discussing the situation with another supervisor or manager, they may speak with a Human Resources representative.

VIII. END OF EMPLOYMENT

Employment Termination

Termination of employment is an inevitable part of Human Resources 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-performance related reasons.
- Retirement – voluntary employment termination initiated by the employee meeting age, length of service, and any other criteria for retirement from the organization.

Adfinitas will generally schedule exit interviews within 60 days following a voluntary termination. The exit interview will afford an opportunity to discuss such issues as employee benefits, conversion privileges, and repayment of outstanding debts to Adfinitas or return of Adfinitas-owned property. Suggestions, complaints, and questions can also be voiced.

Return of Company Property

Employees are responsible for all Adfinitas property, materials, files, keys, equipment, tools, or other property issued to them or in their possession or control.

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

APPENDIX A – Maryland State and Montgomery County Sick Leave Laws

Maryland Healthy Working Families Act

Effective Date: February 11, 2018

Scope of Act: Applies to all employers in Maryland

Purpose of law: The Act requires all Maryland employers to provide sick and safe leave to eligible employees (referred to as “Earned Sick and Safe Leave” or “ESS”). The law does not preempt Montgomery County’s own ESS leave law.

Covered Employers and Employees

Covered Employers:

All Maryland employers are required to begin providing ESS leave once the law is effective on February 11, 2018. Small employers (defined as those with 14 or less employees on average in the preceding year), must provide ESS leave to eligible employees, but the leave may be unpaid. Large employers (defined as those with 15 or more employees on average in the preceding year), must provide paid ESS leave to eligible employees. Employer size is based on number of actual employees each month without regard to employee status or hours worked in the month.

Covered Employees:

- All employees working 12 or more hours per week must accrue ESS leave.
- Employees under age 18 before the beginning of the year are not covered.
- Per diem employees in health or human service industries are not covered if they can accept or reject the shift, are not guaranteed to be called to work and are not employed by a temporary staffing agency.
- Independent Contractors are not covered

Required Rate of Accrual:

- Employees must accrue 1 hour of ESS leave for every 30 hours worked.
- New Employees hired after the law’s effective date must begin accruing ESS leave as of their date of hire.
- Employers are permitted to frontload the full amount of ESS leave that an employee would earn at the beginning of the year rather than do accruals based on hours worked.
 - Employees who frontload ESS leave are not required to allow employees to carryover any unused ESS leave at the end of the year.

Caps on ESS leave:

- An employer is not required to allow an employee to accrue more than 40 hours of ESS

- An employer is not required to allow an employee to carry over more than 40 hours of ESS leave in a year.
- An employer is not required to allow an employee to use more than 64 hours of ESS leave in a year.
 - An employer is not required to allow an employee to accrue more than 64 hours of ESS leave at any time.
- An employer is not required to allow an employee to use accrued ESS leave during the first 106 calendar days worked.
- Employers are not required to pay out unused ESS leave if an employee terminates but must reinstate prior unused ESS leave the employee had at termination if the employee is rehired within 37 weeks of being terminated.

What may ESS leave be used for?

- To care for or treat the employee's own mental or physical illness, injury or condition.
- To care for the employee's family member with a mental or physical illness, injury or condition.
- To obtain preventive medical care for the employee or the employee's family member.
 - Family member means a spouse, child, grandchild, parent, sibling or grandparent of the employee whose relationship as such is based on either biology, marriage, adoption, legal custody, or standing in loco parentis
- For maternity or paternity leave
- For leave is necessary due to domestic violence, sexual assault or stalking committed against the employee of the employee's family member.

What notice requirements are there for ESS?

- Employers may require employees to give the employer not more than 7 days advance notice of the need to take ESS leave when the need is foreseeable.
- The state of Maryland is responsible for creating model notices, policies and posters for employers to use in satisfying their notice obligations under the law.

Maryland Flexible Leave Act

- Employees working primarily in facilities in the state of Maryland who have PTO balances may use their PTO for bereavement purposes in the event of the passing of an immediate family member which includes their: child (adopted, biological or foster, minor or adult), spouse, or parent. Employees are not permitted to use more PTO time than has been accrued.

Paid Sick and Safe Leave (Montgomery County, Maryland)

Effective Date: October 1, 2016

Scope of Act: Applies to all employers in Montgomery County, Maryland

Purpose of law: The Act requires all Montgomery County, Maryland employers to provide sick and safe leave to eligible employees (referred to as “Earned Sick and Safe Leave” or “ESS”).

Covered Employers and Employees

Covered Employers:

- All private businesses who employ one or more persons to work within the county are covered by this amendment.

Covered Employees:

- All employees are covered except:
 - Individuals who: (a) do not have a regular work schedule with the employer; (b) contact the employer for work assignments and are scheduled within 48 hours after contact; (c) have no obligation to work for the employer unless they initiate contact; and (d) are not employed by a temporary placement agency.
 - Individuals who regularly work eight (8) or fewer hours each week.
 - Independent contractors.

Required Rate of Accrual:

- Employees must accrue 1 hour of ESS leave for every 30 hours worked.
- New employees hired after the law’s effective date must begin accruing ESS leave as of their date of hire.
- Employers are permitted to frontload the full amount of ESS leave that an employee would earn at the beginning of the year rather than do accruals based on hours worked.
 - Employees who frontload ESS leave are not required to allow employees to carryover any unused ESS leave at the end of the year.

Caps are there on ESS leave:

- Accrued ESS need not exceed 56 hours in a calendar year.
- If leave is accrued, Employers may cap carry-over from year to year at 56 hours.
- Employers may limit the use of paid leave to 80 hours a year.
- Leave accrues at the beginning of employment, but employers may prohibit use during an initial 90-day probationary period.
- Employers are not required to pay out unused ESS leave if an employee terminates, but must reinstate prior unused ESS leave the employee had at termination if the employee is rehired within 9 months of being terminated.

Use of Leave and Required Notice

Earned leave may be used for any of the following circumstances:

- To care for the employee's mental or physical condition.
- To care for a family member's mental or physical condition.

- To care for a family member who presents a risk to the community because of exposure to a communicable disease.
- To allow the employee or a family member to obtain preventative medical care.
- If the place of business is closed due to a public health emergency.
- If the school or childcare center of a family member is closed due to a public health emergency.
- To seek any medical attention, legal services or any services provided by victim's organizations or to temporarily relocate due to domestic violence, sexual assault or stalking.

A "family member" as defined by the county council includes:

- A biological, adopted, foster, stepchild or grandchild of the employee.
- A child that the employee has legal or physical custody of or for whom the employee is the primary caregiver.
- A biological, adoptive, foster or step parent of the employee or the employee's spouse.
- The legal guardian of the employee or who served as the primary caregiver of the employee when s/he was a minor.
- A spouse.
- A grandparent or the spouse of a grandparent of the employee.
- A biological, adopted or foster sibling or spouse of a sibling of the employee.

What notice requirements are there for ESS?

- In order to use earned leave, employees must request leave as soon as is practicable, notify the employer of the anticipated duration of required leave, and comply with all reasonable procedures that the employer has established for requesting and taking leave.
- Employers may require an employee who uses more than three consecutive days of leave to provide reasonable documentation supporting the absence.
- Employers can permit employees to work additional hours or trade shifts in lieu of using earned sick and safe leave but cannot make this a requirement of taking leave.

Other:

- Employers must permit employees who transfer to worksites outside the county to use the earned sick and safe leave accrued while working in Montgomery County, although continued accrual is not required.