

Online Access, Inc.

2650 Oak St.

Port Huron, MI 48060

Employee Handbook

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Introduction to Online Access, Inc.

Welcome to Online Access, Inc. (hereinafter called “Online Access”)! It is with great pleasure that all of us at Online Access welcome you as a member of our highly trained, cutting-edge team.

Online Access prides itself with having the best customer service in the HVAC and Home Service industry as well as providing quality in all aspects of our business. As a member of our team, we expect that you will do your very best to obtain this same high level of proficiency in a timely manner.

The success of Online Access depends on the success and accomplishments of each employee, individually and as a team member. It is our hope, and the responsibility of management, that each and every employee will continue to learn and grow in their jobs. A dynamic employee can only benefit Online Access. The management is interested in hearing employees’ ideas for productivity improvement, customer service improvement, new technology that has come to their attention, etc. We would also hope that our employees will welcome change within the company, based upon these same improvements that management may devise for the betterment of the company as a whole. Your job, every job, is essential to fulfilling our service mission.

We must earn the trust and respect of our customers every day in order for our current and potential customers to make the decision to choose our services. We are a service business and we are only as good as our people, individually and together. We expect all of our employees to treat each and every customer with the greatest respect and appreciation because using our services is a choice that each customer makes every time they have a web marketing need. We also expect each employee to treat every other employee with the greatest amount of respect.

Online Access has over 400 clients throughout the USA and Canada. We have achieved this through dedicated hard work from every employee to every customer and have earned his or her trust and respect.

What makes Online Access different? Online Access is not like companies that over-promise and over-sell potential clients. We take the time to help our clients understand what can realistically be accomplished, and how they will have to engage with us to be successful.

This employee handbook presents policies related to your time as an employee with us, and we hope that you keep this handbook in an easy-to-access location for your reference. This employee handbook contains the key policies, benefits and expectations of Online Access along with other information that will help you during your tenure with us. This handbook is not all-inclusive, but is intended as a guide to policies, procedures, and general information. This handbook replaces and supersedes previous policies of Online Access whether oral or in writing.

Online Access Mission Statement

At Online Access, our mission statement provides a focus for our company, and it is the basis for how we do business. It guides the decisions we make, from the largest decisions of management to the smallest decisions regarding attention to detail when working with a client. It is of vital importance that all employees of Online Access know and incorporate this mission into their daily actions at work. Again, we feel strongly that being guided by this mission will make the entire company and its people exceptional! Our mission statement is:

*To always provide fast, good, and conscientious service.
To offer what our clients need--without selling them what they don't.
To lead in an industry where others only follow.*

Online Access' Goal

In addition to our mission statement, our company has a goal that we strive toward every day. Our goal is:

"For our clients to be 100% satisfied and obtain a Return on Investment with every product and service we provide."

Online Access' Philosophy

It is required at Online Access that each employee:

- Treat other employees with respect and give them an opportunity to share their ideas to help in the growth and success of our business.
- Treat other employees fairly and with mutual respect. Online Access does not tolerate unlawful discrimination and encourages all managers to involve employees in problem solving.
- Provide the most effective and efficient corrective action to resolve customer service issues, ensure the satisfaction of Online Access' customers and ensure that the problem not be repeated in the future. This paves the way to maintaining and increasing Online Access' market share.
- Answer all customer questions to the best of the employee's ability. If unsure of the correct answer, either inform the customer you will look into the matter and contact them with the answer or direct the customer to the proper employee.
- Give the customer 100% at all times.
- Promote an open-door policy, which encourages interaction, communication, discussions and the flow of ideas to improve the work environment thus increasing our productivity.
- Deliver impeccable, cutting-edge services to our customers in a timely fashion with your best appearance and attitude.
- Help our customers understand and spot what is reality and what is over-hyped with SEO and web marketing.
- Give the customer: The most reasons to want to keep using Online-Access for their Web Marketing needs.

Employment Policies

Employment At-Will

Employment with Online Access is on an “at-will” basis. Employment at-will may be terminated at the will of either Online Access or the employee. Employment may be terminated with or without cause, and with or without notice, at any time by the employee or Online Access. Terms and conditions of employment with Online Access may be modified at the sole discretion of Online Access with or without cause and with or without notice.

No one other than Online Access’ president has the authority to create an employment relationship other than on an “at will” basis, and he/she may only do so in writing.

No implied contract concerning any employment-based decision or terms and conditions of employment can be established by any other statement, conduct, policy, or practice. Examples of the types of terms and conditions of employment that are within the sole discretion of Online Access include, but are not limited to: promotion; demotion; transfers; hiring and discharge decisions; compensation; benefits; qualifications; discipline; layoff or recall; rules; hours and schedules; work assignments; job duties and responsibilities; reduction, cessation, or expansion of operations; sale, relocation, merger, or consolidation of operations; determinations concerning the use of equipment, methods, or facilities; or any other terms and conditions that Online Access may determine to be necessary for the safe, efficient, and economic operation of its business.

Equal Employment Opportunity

Online Access is an equal opportunity employer, and it makes decisions related to compensation and all terms, conditions, or privileges of employment on the basis of merit.

Online Access’ policy prohibits unlawful discrimination based on race, color, creed, sex (including pregnancy, childbirth, or related medical condition), gender, religion, marital status, age, national origin or ancestry, physical or mental disability, height, weight, genetic information, veteran status, or any other consideration made unlawful by federal, state, or local laws. All such discrimination is unlawful and prohibited by Online Access.

Religious Accommodation

Any applicant or employee who requires an accommodation based on a religious belief and/or religious practice should contact management, specify what accommodation he/she needs, and request such an accommodation. In addition, if Online Access becomes aware of an applicant’s or employee’s need for religious accommodation, Online Access will contact the applicant or employee to discuss possible accommodation. As a part of the interactive process, Online Access will identify possible reasonable accommodations, if any, that will help accommodate the applicant’s or employee’s religious beliefs and/or religious practices. If there is more than one reasonable accommodation that will not impose an undue hardship, Online Access will identify and select the accommodation(s) that will be made for the applicant or employee.

Accommodation for Pregnancy or Individuals with Disabilities

Online Access does not discriminate on the basis of a) pregnancy, childbirth, or pregnancy-related medical condition, b) physical or mental disability, or c) medical condition as defined under state and federal law. Online Access will comply with all federal and state laws concerning the employment of persons who are pregnant and/or persons with disabilities and will not discriminate against these individuals in regard to application procedures, hiring, advancement, discharge, compensation, training, or other terms, conditions, and privileges of employment.

Any employee who, due to pregnancy, disability, and/or a serious medical condition, is unable to perform one or more functions of his/her position, or who believes that a temporary transfer to a less strenuous position is appropriate, is encouraged to discuss appropriate reasonable accommodations that may be available with management. Online Access will engage in an interactive process to determine if Online Access can reasonably accommodate these requests so that the impacted individual can perform the essential functions of a job, unless doing so is an undue hardship for the company or causes a direct threat to workplace safety. Please contact management with any questions or requests for accommodation.

Individuals who are currently illegally using unlawful or prescription drugs are excluded from coverage under this policy.

Management is responsible for implementing this policy, including resolution of reasonable accommodation requests, and should be contacted with any questions.

Breaks for Nursing Mothers/Lactation Accommodation

Online Access will provide a reasonable break time for an employee to express breast milk for her nursing child each time the employee has need to express milk for the period required by federal and state laws. The break time shall, if possible, run concurrently with any break time already provided to the employee. Break time for an employee that does not run concurrently with the rest periods will be unpaid unless otherwise required by law. Online Access is not required to provide additional break time if to do so would seriously disrupt the operations of Online Access.

Employees have a right to request a lactation accommodation. Employees should submit any request for a lactation accommodation to their supervisors or Human Resources. Online Access will respond to the request within five business days. Online Access and the employee must engage in an interactive process to determine the appropriate break periods and location for the employee to express milk. If Online Access is unable to comply with the employee's request, it will issue a written response to the employee identifying why it denied the request. Online Access prohibits retaliation against employees for requesting or utilizing a lactation accommodation.

Online Access will provide a place, other than a bathroom, that is shielded from view, free from intrusion from co-workers and the public, and is near the employee's work area, which employees may use to express milk. The space provided may be the place where the employee normally works if it otherwise meets the requirements above.

Online Access will not discriminate or retaliate against any employee for requesting or utilizing a lactation accommodation. If an employee believes the employee's rights under this policy have been violated, or has been discriminated or retaliated against, please notify Human Resources .

Severability Clause

It is the intent of the management of Online Access to abide by all published guidelines of the National Labor Relations Board. If a policy does not match guidelines of the NLRB than that one policy is severed from this document without negating the rest of the document. See www.nlrb.gov.

Adverse Policy Impact

Online Access has implemented numerous policies that are designed to achieve important business objectives. Online Access recognizes, however, that an otherwise legitimate workplace policy can have unintended consequences to individuals in a particular group or class. If an employee feels that one of Online Access' policies adversely impacts him/her due to his/her unique circumstances (e.g. his/her membership in one of the "protected classes"), he/she may seek accommodation regarding such policy. The procedure to seek this accommodation is as follows: the employee should deliver to his/her supervisor (or any other supervisor) a memorandum, in writing, which identifies the: (1) policy at issue; (2) reason why the policy, as it applies to him/her, creates an adverse impact on him/her; and (3) accommodation that he/she requests to avoid this adverse impact.

Examples of "protected classes" include, but may not be limited to, race, color, creed, sex (including pregnancy, childbirth, or related medical condition), gender, religion, marital status, age, national origin or ancestry, physical or mental disability, height, weight, genetic information, or veteran status.

Complaint Reporting Procedure

Online Access expects the highest standard of ethical conduct and fair dealing from each employee and officer of the company. The company's reputation is a valuable asset and the company must continually earn the trust, confidence, and respect of its customers and community. Because of this, Online Access encourages all individuals to report any incidents of unlawful discrimination, sexual harassment, other harassment, retaliation, or denial of accommodation immediately so that complaints can be quickly and fairly resolved. Please note: federal and state discrimination laws establish specific time frames for initiating a legal proceeding pursuant to those laws.

If an employee believes that he/she has been the victim of discrimination, harassment (including sexual harassment), retaliation, and/or denied accommodation (for a disability, pregnancy, childbirth, related medical condition, or religious belief and/or religious practice), the employee should report this problem to his/her immediate supervisor or any other member of management. In a case where the employee's complaint may involve his/her immediate supervisor, he/she should notify any other member of management.

Complaints or reports of discrimination, harassment, retaliation, and/or denied accommodation can be made either verbally or in writing. A form for submission of a complaint can be obtained through asking your supervisor, any other member of management, or Human Resources, and all employees are encouraged to use this form if making a written complaint. Complaints can be made using other forms or no form at all; however, using this form can help ensure that management receives the information necessary to complete a thorough investigation. Employees may report a situation on behalf of another employee. When doing so, the employee should use the complaint form and indicate that it is completed on another employee's behalf.

An employee's complaint should be as detailed as possible. The employee will be asked to provide the details of the incident(s) that occurred, and the names of all individuals involved and any witnesses. It would be best to communicate the complaint in writing, but this is not mandatory.

Supervisors and managers will refer all complaints involving discrimination, harassment or other prohibited conduct to the owners of Online Access. Upon receipt of a complaint, the owners will immediately undertake an effective, thorough, and objective investigation of the allegations. All complaints will be investigated.

Furthermore, supervisors are **required** to report suspected harassment, discrimination, or retaliation to Online Access owners.

Managers and supervisors will be held responsible for any harassment, discrimination, or retaliation they commit. In addition, supervisors and managers will be subject to disciplinary action, up to and including immediate termination, for failing to report suspected harassment, discrimination, or retaliation; or otherwise knowingly allowing harassment, discrimination, or retaliation to continue.

Investigations will be confidential. Information obtained during the complaint procedure and investigation will only be shared with those individuals on a need-to-know basis or as required by law. An Online Access representative will advise all parties concerned of the results of the investigation.

If Online Access determines that discrimination, harassment, or other prohibited conduct has occurred, effective remedial action will be taken in accordance with the circumstances involved. Any employee determined by Online Access to be responsible for discrimination, harassment, or other prohibited conduct will be subject to appropriate disciplinary action, up to and including termination of employment.

Online Access will not retaliate against an employee for filing a complaint and will not tolerate or permit retaliation by management, employees, co-workers, or third parties.

Employment Status

- The **company waiting period** is the first three months after hire. During this waiting period, employees are ineligible for certain benefits, such as paid holidays.
- **Full-time employees** are those employees who generally work forty (40) or more hours per week. All full-time employees shall be eligible to receive all the benefits set forth by Online Access, which may change from time to time.
- **Part-time employees** are those employees who work less than forty (40) hours per week. Part-time employees shall not be eligible to participate in any insurance plans adopted by Online Access, nor any other fringe benefit programs. Special conditions may apply if an employee regularly works at least thirty (30) hours in a week or where mandated by law.
- **Exempt employees** are those employees who hold jobs that, in compliance with federal and state requirements, are exempt from overtime compensation and minimum wage requirements.
- **Non-exempt employees** are those employees who are eligible for overtime payment based upon FLSA requirements. Questions regarding exemption status should be directed to Human Resources.

Immigration Laws

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

In compliance with the Immigration Reform and Control Act of 1986, as a condition of employment, each employee must complete the Employment Eligibility Verification Form I-9 and provide documentation establishing his/her identity and employment eligibility. Questions or requests for further information about immigration law issues should be directed to Human Resources.

Work Area, Employee Container Search Policy

Online Access reserves the right to inspect any employee's work area, locker, desk, or any other enclosed container kept by the employee on the work premises or in a vehicle rented or used for company business. Such inspection may be done with or without notice and with or without cause.

If the employee has a lock on a locker, container, etc., the employee shall open the container upon request. Failure to unlock a locker or container shall be deemed an act of gross insubordination and shall be grounds for discharge.

Work Day Details

Attendance, Absence and Punctuality

Online Access views its employees' reliable attendance as crucial to its overall success. When an employee is absent unexpectedly, this requires another employee to forego some of his/her other responsibilities and assume the responsibilities of the absent employee to ensure the company runs smoothly. Although Online Access understands that emergencies happen, the company must also consider the needs of its other employees and customers.

Employees are expected to report to work as scheduled, on time and prepared to start work. Employees are expected to remain at work for their entire work schedule, except for meal periods or when required to leave on Online Access authorized business. Late arrival, early departure or other absences from scheduled hours are disruptive and must be avoided.

Excessive absenteeism or tardiness (excused and unexcused) will not be tolerated and it may result in disciplinary action, up to and including termination of employment. Disciplinary action taken due to absenteeism will be considered following a review of the employee's absences, reasons for such absences and overall work record.

If it is not possible to be at work at the scheduled time, an employee shall call his/her supervisor at least 30 minutes before the start of his/her scheduled work time on each and every day of tardiness or absence except when there are extenuating circumstances. All notification of absences must be made by the employee to his/her supervisor personally. Having another individual report an absence or a tardiness is only acceptable if an employee is physically unable to report the absence. *Text messages are not considered an acceptable form of notification.* In all cases of absence or tardiness, employees must provide their supervisors with an honest reason or explanation. Failure to report an absence or communicate a tardiness will result in the absence or tardiness being treated as an unexcused absence.

An employee who does not call or report to work for three consecutive work days will be considered to have voluntarily resigned employment with Online Access, unless there are extenuating circumstances. Supervisors experiencing such absences should contact management immediately.

Personal appointments, such as those related to doctors or dentists, should be scheduled during non-work hours unless approved in advance by the employee's supervisor.

Prior to taking a planned leave of absence for purposes of PTO, military leave, bereavement leave, jury duty, or other planned absence, an Employee Leave Request should be submitted to the employee's immediate supervisor for approval at least four weeks prior to the scheduled leave date, unless the request is due to an unexpected emergency. The nature of the emergency should then be shared with the supervisor.

Work Hours and Meal Periods

Online Access' office is currently open Monday-Friday 8:30am – 5:00pm.

Lunch periods are one half hour long and are not to be working lunches.

Online Access does not guarantee a specific number of daily, weekly, monthly, or yearly hours. All scheduled hours are based upon many factors, including company profitability and call volume.

Time Records

Online Access will not allow any form of retaliation against individuals who report alleged violations of this policy or who cooperate in any investigation of such reports.

It is Online Access' policy and practice to accurately compensate employees in compliance with all applicable state and federal laws. To ensure payment is made properly for all time worked and that no improper deductions are made, it is each employee's responsibility to accurately record all time worked and review his/her paystubs promptly to identify and report any errors. Online Access' policy prohibits engaging in off-the-clock or unrecorded work.

All non-exempt employees are required to submit time records. Each department will develop procedures for time record submission. This information will be presented at orientation. Employees will be notified of any changes in writing. If an employee has any questions regarding this procedure, he/she should speak with his/her supervisor for clarification.

Each employee's time record should show all hours worked. Time records not submitted according to established procedures may result in errors in the employee's pay. Correction of any errors may be delayed until subsequent pay periods.

All planned PTO hours should be submitted on the appropriate time off request sheet. That sheet must contain the signatures of ALL individuals required to authorize or approve the employee's time off.

Completing another employee's time record, allowing another employee to complete a time record, or altering a time record is considered a falsification of Online Access documents and is grounds for disciplinary action. If any manager or other employee instructs an employee to: 1) incorrectly or falsely under- or over-report his/her hours worked; 2) alter another employee's time records to inaccurately or falsely report that employee's hours worked; or, 3) conceal any falsification of time records, the employee should not do so but, instead, report it immediately to management.

Off-the Clock Work

You should not work any hours outside of your scheduled work day unless your supervisor has authorized the unscheduled work in advance. Do not start work early, finish work late, work during a meal break or perform any other extra or work unless you are authorized to do so **and** that time is recorded on your time card.

Employees are prohibited from performing any "off-the-clock" work. "Off-the-clock" work means work you may perform, but fail to report the time worked on your time card. Any employee who

fails to report or inaccurately reports any hours worked will result in discipline, up to and including unpaid suspension and/or termination of employment.

Overtime

When operating requirements or other needs cannot be met during regular working hours, employees in non-exempt positions will be assigned or given the opportunity to volunteer for overtime work assignments. All overtime work must receive prior authorization from a supervisor or manager. Overtime assignments will be distributed as equitably as practical to all employees in non-exempt positions who are qualified to perform the required work. Overtime assignments may, at times, be considered mandatory requirements of any position.

As required by law, overtime pay is based on actual hours worked. PTO, holiday, sick, bereavement, or any leave of absence time will not be considered hours worked for purposes of performing overtime calculations. Failure to work scheduled overtime or overtime worked without prior authorization (written or verbal) from management may result in corrective action, up to and including termination of employment.

Overtime is paid to employees in non-exempt positions according to state and federal regulations, as set forth below:

- Time and one-half: Compensation for hours worked in excess of forty (40) hours in one workweek is paid at one and one-half times the employee's regular rate of pay.

Please note: an employee's "regular rate of pay" will include all non-discretionary forms of compensation, in accordance with federal legislation.

Telecommuting

Telecommuting allows employees to work at home, on the road or in a satellite location for all or part of their workweek. Online Access considers telecommuting to be a viable, flexible work option when both the employee and the job are suited to such an arrangement. Telecommuting may be appropriate for some employees and jobs but not for others. Telecommuting is not an entitlement, it is not a companywide benefit and it in no way changes the terms and conditions of employment with Online Access.

- Tax and other legal implications. The employee must determine any tax or legal implications under IRS, state and local government laws, and/or restrictions of working out of a home-based office. Responsibility for fulfilling all obligations in this area rests solely with the employee.

Equipment supplied by the organization is to be used for business purposes only. The telecommuter must sign an inventory of all Online Access property received and agree to take appropriate action to protect the items from damage or theft. Upon termination of employment, all company property will be returned to the company, unless other arrangements have been made.

Consistent with the organization's expectations of information security for employees working at the office, telecommuting employees will be expected to ensure the protection of proprietary company and customer information accessible from their home office. Steps include the use of

locked file cabinets and desks, regular password maintenance and any other measures appropriate for the job and the environment.

Telecommuting employees who are not exempt from the overtime requirements of the Fair Labor Standards Act will be required to accurately record all hours worked using Online Access' time-keeping system. Hours worked in excess of those scheduled per day and per workweek require the advance approval of the telecommuter's supervisor. Failure to comply with this requirement may result in the immediate termination of the telecommuting agreement.

All informal telecommuting arrangements are made on a case-by-case basis, focusing first on the business needs of the organization

Pay Policies

Paydays

There are approximately twenty-six (26) paydays every calendar year. Employees are paid every other Thursday for work through the previous pay period. Online Access' seven-day workweek is from 12:00 a.m. Tuesday through 11:59 p.m. the following Monday. Each pay period consists of two of these Tuesday through Monday workweeks, and employees are paid on the Thursday following the last Monday of the pay period.

Employees may have their paychecks deposited directly into their bank accounts by filing the appropriate paperwork. Employees in the direct deposit program receive a paper or emailed document showing hours worked, rates of pay, withholdings, and net pay each payday. It is possible to allocate amounts to one or more bank accounts. If an employee wishes to do so, he/she should contact Human Resources for more information and the appropriate paperwork.

On occasion, Online Access may issue traditional paper paychecks. Paper paychecks, when issued, are normally available at the beginning of the business day at the office.

If a payday falls on a holiday, employee's pay and paystubs will be available the prior business day unless Online Access specifies otherwise.

Online Access makes every effort to ensure employees are paid correctly. Occasionally, however, unintentional errors happen. Mistakes discovered by or brought to the attention of Online Access, will be promptly corrected. Each employee should review his/her pay stub upon receipt to ensure it is accurate. If an employee believes that his/her wages have been subject to any improper deductions, his/her pay does not accurately reflect all hours worked, or he/she has inadvertently been overpaid, he/she should report his/her concerns to Human Resources. Online Access will promptly investigate and make corrections, as appropriate.

Deductions from Pay

An employee's pay will be subject to required deductions for federal, state, and/or local taxes and social security. Voluntary deductions agreed to in writing may be made for certain things, such as health, dental, or life insurance premiums, contributions to a retirement plan, or accounts receivable balances.

Furthermore, it is Online Access' policy to comply with all valid claims against the wages of employees. If Online Access receives a wage garnishment, child support order, or some other legally valid claim, the impacted employee will be notified about the details of the garnishment or wage order. While an employee may attempt to work out his/her financial difficulties with the creditor in such situations, Online Access will be required to comply with the provisions of the garnishment notice or order, as soon as it is received, to ensure Online Access' compliance with applicable laws.

Exempt employees will receive their full salary for any workweek in which work is performed. However, under federal law, an exempt employee's pay may be subject to deductions, absent state law to the contrary. Examples of permissible deductions include:

- Full day absences for personal reasons where PTO is not utilized.
- Full-day absences for sickness or disability where PTO is not utilized.
- The first or last week of employment, in the event the employee worked less than a full week.

This list is not all inclusive.

In the workweek in which work is performed, an exempt employee's pay will not be reduced for any of the following reasons:

- Partial day absences for personal reasons, sickness, or disability.
- An absence because the facility is closed on a scheduled workday.
- Absences for jury duty, or attendance as a witness.
- Any other deductions prohibited by state or federal law.

Please note: Exempt employees will be required to use available PTO for full or partial day absences for personal reasons, sickness, or disability. However, an exempt employee's pay will not be reduced for partial day absences if he/she has exhausted his/her paid time off.

Performance Appraisals and Merit Increases

Every employee's performance is important to Online Access. Each employee will have a conversation with his/her supervisor regarding his/her performance, both positive and negative, on an ongoing basis. Online Access' performance review program provides the basis for better understanding between each employee and his/her supervisor regarding the employee's job performance, potential, and development within the company.

Online Access attempts to provide increases in pay based upon merit. These increases are based on several factors, including the overall success of Online Access. Factors that make employees eligible for an increase in pay include, but are not limited to: job performance, productivity, current salary in the employee's position/grade level, and the employee's level of pay relative to what the industry is paying for similar qualities and talent in Online Access' geographical area. Increases in pay are made at the sole discretion of management, and they are not made on any set timetable.

Employee Separation and Final Paycheck

Online Access requests that an employee who chooses to terminate his/her employment provide written notice to his/her supervisor stating his/her last date of employment and his/her reason for leaving. A two-week notice of resignation is requested, if possible. Online Access further requests that all employees participate in an exit interview prior to the employee's last day.

Should an employee separate from Online Access, his/her last paycheck may be distributed to him/her as a physical check, and therefore, his/her final pay may not be directly deposited into his/her account(s), regardless of any prior checks being processed using Direct Deposit.

An employee must return all Online Access clothing and equipment before the last day of employment, including, but not limited to, all keys and/or access cards, and charge cards (if issued).

Upon termination of employment, payment for any unused PTO remaining in an employee's account will be based on the timing and nature of the separation. The amount owed will be prorated from their work anniversary date.

Should Online Access initiate separation because of an employee's misconduct (e.g., the employee gets fired), the employee will not be paid for any unused PTO. If Online Access initiates a separation, the employee will be paid for unused PTO. If the employee initiates the separation but is not on amicable terms, the employee will not receive payment for unused PTO. If the employee initiates the separation, provides at least a two-week notice, and is available to work those last two weeks. If the employee is leaving on amicable terms, the employee will receive payment for any accrued but unused PTO.

Employees will be paid all monies normally due to an employee based upon his/her pay agreement. However, an employee will not be paid for any fringe benefits, such as discretionary bonuses (e.g. Christmas bonuses, bonuses based on overall company success), that are given during the month he/she leaves Online Access or at any time after separation from Online Access.

While the decision to begin the employment relationship is consensual, the same is not always true when the time comes to terminate the employment relationship. As an at-will employer, Online Access may end the employment relationship at any time, with or without cause or notice. In the event that employment is terminated, the terminated employee must return all property owned by Online Access upon the earlier of Online Access' request or upon his/her departure.

Employee Benefits

Social Security

Online Access is required by law to participate in the Federal Insurance Contribution Act (FICA or Social Security). The amount of an employee's contribution will automatically be deducted from his/her paycheck. Online Access must also contribute an equal amount to an employee's Social Security account for as long as he/she works for Online Access.

Worker's Compensation Insurance

Online Access provides worker's compensation coverage for all employees at no cost to employees. Any employee who sustains an injury arising out of and in the course of his/her work for Online Access must **immediately** report the injury to Human Resources. Consistent with applicable laws, failure to report an injury within a reasonable period of time could jeopardize an employee's claim. Any medical expenses paid will be done in accordance with the provisions of the Worker's Compensation Act. Additionally, Online Access will attempt to provide any reasonable accommodation that is medically necessary, feasible and does not impose an undue hardship on Online Access, as prescribed by applicable federal, state or local law.

Medical Insurance

Eligible full-time employees may enroll in either a single, couple or family contract for medical insurance. Employees are eligible for medical insurance on the first day of the month following 30 days of continuous full-time employment. Information and enrollment forms may be obtained from Human Resources.

Online Access pays 70% of the cost of any contract, including single, couple and family options. All additional premiums will be deducted, pre-tax, directly from the employee's paycheck.

Upon termination of employment, an employee may be entitled to continuation or conversion of the group medical insurance plan in accordance with the terms of the policy and/or applicable state and federal law. For more information, the employee should contact Human Resources. A booklet containing the details of the plan will be provided to covered employees upon enrollment.

Health Savings Account (HSA)

A Health Savings Account (HSA) is a pre-tax benefit that is available to people who are enrolled in a high-deductible health plan (HDHP). The plan allows eligible employees to set aside a specific pre-tax dollar amount for qualified medical expenses. HSA funds roll over and accumulate year-to-year if they are not spent and they remain the property of the employee regardless of employment status with Online Access. Employees who are enrolled in Online Access' high-deductible health insurance are eligible for this benefit and will be automatically enrolled.

Online Access will contribute \$40 each month for employees who have a single contract for medical insurance and \$80 each month for those who have either a couple or family medical insurance contract.

Online Access reserves the right to change this program at any time.

Additional Insurance Benefits

Eligible full-time employees may enroll in either a single, couple or family contract for dental and/or vision insurance. Employees are eligible for these insurance options on the first day of the month following 30 calendar days of full-time employment. Online Access pays 70% of the cost of any contract, including single, couple and family options. All additional premiums will be deducted, pre-tax, directly from the employee's paycheck. Employees may obtain information and enrollment forms from Human Resources.

Personal Paid Time Off (PTO)

PTO refers to a bank of personal paid time off which includes vacation, sick time and personal time. Full-time employees of Online Access receive PTO as a benefit of employment. PTO may not be taken until after the completion of an employee's initial 120-days of employment without special permission.

Online Access 'pre-loads' an employee's ability to use paid PTO based on the date of hiring, after the employee's initial 120 days of employment, and every year thereafter on their work

anniversary to make it easier for the employee to use. However, certain conditions upon the end of employment may apply as described later in this section.

Paid PTO is accrued on an employee's anniversary of his/her date of hire. Full-time employees are eligible to receive paid PTO in accordance with the following schedule and requirements:

PTO given per time employed:

At least 120 days but less than 3 years	72 hours per year
At least 3 years but less than 8 years	80 hours per year
At least 8 years	120 hours per year

Part-time employees are eligible to receive PTO based on the percentage of hours worked compared to the 40-hour work week of a full-time employee. For example, an employee who works 30 hours a week would receive 75% of the PTO hours that a 40 hour per week employee receives.

If an employee does not use all of his/her paid PTO in the course of his/her anniversary year, any unused days will be paid to the employee in the first paycheck following the end of his/her employment anniversary and he/she will be eligible for new days of paid PTO based on their time employed on his/her employment anniversary.

PTO pay is calculated at an employee's base rate of pay at the time the paid PTO is used. It does not include overtime, or any special form of compensation. Please note that use of paid PTO hours is not considered "hours worked" for the purposes of overtime compensation or calculations. All PTO requests must be requested in 1-hour increments.

Requested time off must first be applied against any unused PTO until the employee's PTO is depleted.

Consistent with work requirements, every effort will be made to give an employee the time off that he/she requests. Apart from using paid PTO for unplanned sick days, if more than one employee in the same department selects the same time for PTO and both employees cannot be off at the same time, the day the request was made will be the determining factor. If both employees request their leave on the same day, the length of service will be the determining factor. Apart from using PTO for paid sick days, PTO scheduling is at the sole discretion; and is the responsibility, of Online Access. To be considered for paid or unpaid PTO, an employee must fill out the appropriate Request for Time Off form and deliver that form to his/her supervisor. Employees are encouraged to place requests early. Unless it is due to a medical or health related need, Online Access reserves the right to schedule or deny an employee's requested PTO based on business necessity.

An employee's PTO must be scheduled in advance with at least a 30-day notice for personal use or a 7-day notice if for a scheduled health appointment . However, the following allowance is accepted for unplanned medical and health reasons of the employee or their immediate family based upon the Earned Sick Time Act. PTO used for this must be communicated to your acting manager as soon as it is possible or practical.

Unscheduled PTO can be used for the following situations:

- The employee's or the employee's family member's mental or physical illness, injury, or health condition; medical diagnosis, care, or treatment of the employee's or the employee's family member's mental or physical illness, injury, or health condition; or
- emergency preventative medical care for the employee or the employee's family member.
- If the employee or the employee's family member is a victim of domestic violence or sexual assault, for medical care or psychological or other counseling for physical or psychological injury or disability; to obtain services from a victim services organization; to relocate due to domestic violence or sexual assault.
- For meetings at a child's school or place of care related to the child's health or disability, or the effects of domestic violence or sexual assault on the child; and
- For closure of the employee's place of business by order of a public official due to a public health emergency; for an employee's need to care for a child whose school or place of care has been closed by order of a public official due to a public health emergency; or when it has been determined by the health authorities having jurisdiction or by a health care provider that the employee's or employee's family member's presence in the community would jeopardize the health of others because of the employee's or family member's exposure to a communicable disease, regardless of whether the employee or family member has actually contracted the communicable disease.

Immediate family members include:

- Biological, adopted or foster child, stepchild or legal ward, a child of a domestic partner, or a child to whom the employee stands in loco parentis.
- Biological parent, foster parent, stepparent, or adoptive parent or a legal guardian of an employee or an employee's spouse or domestic partner or a person who stood in loco parentis when the employee was a minor child.
- Grandparent.
- Grandchild.
- Biological, foster, or adopted sibling.
- Any other individual related by blood or affinity whose close association with the employee is the equivalent of a family relationship.
- Domestic partner" means an adult in a committed relationship with another adult, including both same-sex and different-sex relationships.
- "Committed relationship" means one in which the employee and another individual share responsibility for a significant measure of each other's common welfare, such as any relationship between individuals of the same or different sex that is granted legal recognition by a state, political subdivision, or the District of Columbia as a marriage or analogous relationship, including, but not limited to, a civil union.

If an employee is unable to work due to health or medical issues, he/she may be granted paid or unpaid excused leave in the following order while they recover: If an employee has unused paid PTO available, those hours will be used to cover sick time off as needed. If PTO has already been used and is unavailable to the employee, the approved time off will be taken without pay. The following policies still apply, regardless of whether paid PTO is being used (apart from when PTO is used for an unplanned illness).

After 3 consecutive days of absence or longer due to health or medical issues, Online Access retains the right to request any employee to verify an illness or injury with a written statement

from a physician stating the employee was absent due to a health issue and can return to work.

If an employee becomes sick during the day, his/her supervisor must be notified before the employee leaves the work site.

An employee who is unable to report to work due to illness or injury must inform his/her supervisor of that absence as soon as practical every day of absence. For more information regarding proper notification procedures, please see the “Attendance, Absence and Punctuality” policy in Workday Details section of this Employee Handbook.

Failure to follow this policy may result in the treatment of any missed time as an unexcused absence and could result in disciplinary action, up to and including termination of employment.

Upon termination of employment, payment for any unused paid PTO hours remaining in an employee’s account will be based on the nature of the separation. If paid, the amount of paid PTO will be recalculated based on the percentage of days employed from their last employment anniversary. If Online Access initiates a separation because of an employee's misconduct (e.g. the employee gets fired), the employee will not be paid for any unused PTO. If Online Access initiates a separation with no cause (e.g. the employee gets laid off), the employee will be paid for any unused PTO based on the percentage of days employed from their last employment. If the employee initiates the separation, but the separation is not on amicable terms, the employee will not receive payment for accrued but unused PTO. If the employee initiates the separation, provides at least a two-week notice, works those last two weeks and the employee is leaving on amicable terms, the employee will receive payment for any unused paid PTO based on the percentage of days employed from their last employment anniversary. Employees who do not successfully complete their initial 120-day employment with Online Access have no paid PTO and no payment for it is owed.

Paid Holidays

Online Access observes six full day paid holidays per year and two half day paid holidays. Online Access’ paid holidays include:

- New Year's Day (January 1)
- Memorial Day (Last Monday in May)
- Independence Day (July 4)
- Labor Day (First Monday in September)
- Thanksgiving Day (Fourth Thursday in November)
- Christmas Eve (4 hours - December 24th)
- Christmas Day (December 25)
- New Year's Eve (4 hours - December 31)

Online Access does NOT observe Good Friday or the Friday after Thanksgiving as paid holidays. As such, the office will not close on these days and no holiday pay is granted. If an employee requests these days off in advance and the request is approved by management, he/she may use unused PTO for these days. Otherwise, any approved time off on these days will be unpaid.

Regular (non-temporary) full-time employees receive holiday pay based on their normally

scheduled straight time hours. Regular (non-temporary) part-time employees will be paid holiday pay if the holiday falls on a day the employee would normally be scheduled to work and for the percentage of hours he/she works based on a 40 hour work week (normally works 30 hours per week/40 hour full-time work week = 75% of an 8 hour day = 6 hours paid holiday hours). Temporary employees and new employees who have not yet completed the Company Waiting Period are ineligible for holiday pay.

Holidays are paid at the employee's normal base rate and do not include overtime or any special form of compensation.

To the extent allowed by state and federal law, unexcused absences on the workday immediately preceding and following a holiday will result in ineligibility for holiday pay. For the purpose of holiday pay, illness immediately preceding or following the holiday must be confirmed by a doctor's note. If a recognized holiday falls during an approved paid PTO period, the employee will be paid for the holiday and not charged with a paid PTO day for the day on which the holiday is observed. Finally, if a recognized holiday falls during an employee's unpaid leave of absence, he/she will not be eligible for holiday pay.

When a holiday falls on Saturday, it is usually observed on the preceding Friday. When a holiday falls on a Sunday, it is usually observed on the following Monday. However, Online Access may close on another day or grant a floating day off instead of closing. Holiday observances will be announced in advance.

Eligible employees will receive holiday pay for designated paid holidays. Employees who are needed to work on a holiday will be paid straight time for any hours worked on the holiday in addition to 8 hours of holiday pay. Please note: any holiday benefit hours are not considered "hours worked" for the purposes of overtime calculations.

Retirement Plan

Online Access provides eligible employees with the opportunity to participate in a 401(k) Qualified Retirement Plan, which allows employees to save a portion of their compensation for retirement with pre-tax dollars. In addition, Online Access offers access to a Roth 401(k) Plan, which allows employees to save a portion of their compensation with post-tax dollars. These options have different benefits, and Online Access will provide access to professionals in this area for interested employees to make an educated decision between the two options.

Employees are eligible to participate in the retirement programs if they are 21 years of age or older and have worked for Online Access for at least 6 months or 1000 hours.

At its option, Online Access may contribute a matching amount of funds to each employee enrolled in the program. Taxes for these contributions and their related earnings are deferred until

distribution from the plan.

Employee contributions are 100% vested at the time they are contributed. However, company contributions are not fully vested to the employee until after the employee's sixth year of employment.

Additional information on the retirement plans is available through Human Resources. Employees are encouraged to seek professional advice from a financial expert prior to seeking any early distributions from a retirement plan.

Leave of Absences

Personal Leave

A personal leave of absence without pay may be granted at the discretion of Online Access. Requests for personal leave should be limited to unusual circumstances requiring an absence of longer than two weeks. Employees are required to use any available PTO before beginning an unpaid personal leave of absence.

Unpaid personal leave for illness and injury is governed by Online Access policy and federal and state laws.

While on a personal leave of absence, an employee is ineligible for certain benefits, such as paid holidays.

Online Access will not pay the health care premiums of any employee or, if applicable, an employee's dependents during a leave of absence unless such payment is required by state or federal law. See management for information on the continuation of benefits. Employees are required to use PTO for personal absences of duration shorter than two weeks. If an employee does not have sufficient accumulated PTO, a leave without pay may be granted at Online Access' discretion. However, unscheduled short-term leave without pay is disruptive to Online Access' staffing goals and such leave, unless required by law, will be granted only under emergency circumstances. At the management's discretion, short-term unpaid leave may also be granted only with the requirement that the employee agrees to work additional hours on a different day, such as Saturday. Excessive absenteeism will result in disciplinary action up to and including termination of employment. When an employee requests and is granted unpaid time off this disrupts the flow of work and efficiencies. It requires another employee to take up additional responsibilities, thereby causing some or all their normal duties to go undone. It is important to understand that the company has associated expenses with this leave even though the employee is not being paid.

When an employee is ready to return to work following a leave of absence for illness or injury, a written release from the treating physician must be provided to management. This requirement may be waived at management's discretion.

Bereavement Leave

Online Access offers its employees who have lost a loved one(s) time off with pay according to the following provisions:

- Spouse, parents, parents-in-law, children, siblings, siblings-in-law, grandparent, grandparent-in-law, grandchildren: up to three workdays.
- Aunt, uncle, cousins: 1 workday.

- An employee may request additional time off. Additional time off must be approved by management, and it will be granted on an unpaid basis. However, if an employee has unused paid PTO, it may be used for this purpose.
- Bereavement leave for other individuals may be granted at management's discretion. Granted leave may be paid or unpaid based upon management's approval and/or availability of paid PTO hours.

Please note that bereavement leave hours are not considered "hours worked" for the purposes of overtime calculations.

Jury Duty or Witness Leave

Online Access supports employees called to fulfill their civic duty to serve jury duty when called. An employee who has been summoned must provide a copy of the official documentation to his/her supervisor at his/her earliest opportunity. In addition, the employee must provide Online Access with court-provided documentation of attendance for each day he/she misses.

Please note should extraordinary circumstances exist that would make an employee's absence severely detrimental to the operation of the company, Online Access reserves the right to contact the court to request that the employee's service be postponed.

Jury Duty Leave is unpaid; however, an employee may choose to use any accrued but unused paid PTO hours while on jury duty. If an employee is not required to serve an entire workday on jury duty and there is work available at Online Access, the employee may work a partial day with managerial authorization.

Employees who receive a subpoena to be a witness at a hearing or trial will be granted Witness Leave according to the same requirements for Jury Duty above. Witness Leave may not be granted if an employee volunteers to be a witness.

An employee may retain any mileage allowance, fees, etc. paid by the court for jury or witness service.

Crime Victim's Leave

An employee who is a victim of a crime or representative of a crime victim will receive unpaid leave to:

- Testify at criminal proceedings in response to a subpoena or at the prosecuting attorney's request.
- Be present during the victim's testimony.

At management's discretion, appropriate documentation from the court may be required.

If an employee has any unused paid PTO, he/she may use it for the purposes of Crime Victim's Leave as stated in the next paragraph.

If the employee or the employee's family member is a victim of domestic violence or sexual assault, the employee may use PTO to obtain services from a victim services organization; to

relocate due to domestic violence or sexual assault; to obtain legal services; or to participate in any civil or criminal proceedings related to or resulting from the domestic violence or sexual assault.

Time Off to Vote

Employees' working hours on the day of a primary or election, general or special, will be arranged to the extent possible so that each employee will have a reasonable time, up to two unpaid hours, available for voting during the hours the polls are open. If an employee's work schedule does not give the employee two free hours during the time the polls are open, not including meal breaks, the employee will be allowed to take a reasonable time, up to two hours unpaid, from the employee's work schedule for voting purposes.

No employee will be penalized or retaliated against for requesting time off to vote.

Military Leave

Online Access proudly grants and will follow all applicable federal and state laws concerning military leave. If an employee is called to active duty and requires military leave, he/she should provide the appropriate documentation to management as soon as possible.

Generally, an employee returning from military leave is guaranteed re-employment and other rights as long as he/she complies with certain notification requirements, as required by federal or state law. The period of time within which an employee must return to work after the completion of service depends on the duration of the military service. Please see management regarding further details.

Service members and their families will continue to receive health benefits if the employee's absence is for 30 days or less. Employees returning from military leave will resume health plan coverage without a waiting period or other exclusion.

The period of military duty will be counted as covered service for the purposes of retirement plan eligibility, vesting and benefit accrual. Online Access may not make plan contributions during military leave. However, upon re-employment, Online Access will restart contributions and make-up contributions that would have been made during an employee's absence. If an employee is required to contribute to the retirement plan, he/she will have up to three times the period of military duty or five years, whichever is first, to make the contributions.

Return to Work

For any leave of absence of 3 days or longer for medical reasons, including workplace accidents, employees may be required to submit a release for work from a doctor. This release should detail any restrictions the employee has upon his/her return to work.

We strongly encourage all employees to return to work as soon as medically able. Whenever possible, management will work with all returning employees to determine if reasonable accommodation is feasible for doctor-certified restrictions, including alternative job assignments. Some alternative job assignments offered may be offered with a different pay structure.

Please note: Employees who are away from the workplace for extended periods may lose eligibility for many benefits, including medical insurance. Because of this, we strongly encourage individuals to return to work as soon as they are able, even if they are only able to return on a limited basis.

Employees who are away from work for medical reasons are expected to communicate with management on an ongoing basis while away from work. Ongoing communication must include predictions for return-to-work availability.

Lifelong Learning

On-the-Job Training and Meetings

Online Access, believes it is important to keep all employees up-to-date on various internal business items, as well as in-house training.

On-the-job training can and should happen on a continuing basis. Supervisors and managers can impart their knowledge formally or informally in a meeting or any other time as appropriate. Training can happen one-on-one or in a group setting. Supervisors and managers can also learn from other employees. Every employee should be open to daily improvement. Other extended training opportunities are also possible. Please see the “Continuing Education Program” policy in Section 3 of this handbook for more details. If an employee has any questions regarding training, he/she should contact his/her supervisor.

Continuing Education

At its discretion, Online Access will inform eligible employees of company paid training opportunities. Unless otherwise notified, participation in these training opportunities is optional, but attendance at some of these optional trainings may be considered mandatory for promotion.

Employees who elect to attend training and whose attendance has been approved by management will be paid for their regular wages for eight (8) hours for each day at training. For a partial day of training, the employee will be paid for regular hours actually at training. For any away from home travel required see the Travel Policy section for paid and reimbursed expense information.

At management’s discretion, employees may be held financially liable for any funds distributed in association with this policy if the employee does not pass or complete the course for any reason.

Also at management’s discretion, employees may be held liable for all monies distributed for a tuition reimbursement for up to one year after the completion of the course. During this time, if an employee leaves employment with Online Access, regardless of who initiates the separation, the employee may be held financially liable for some or all of the funds distributed in accordance with this policy. Although the employee will be held financially responsible for this period of time, this responsibility shall in no way constitute an employment contract or erode Online Access’ policy of at-will employment.

Management may require that an employee sign a contract detailing the specifics of the training agreement before paying any fees associated with the continuing education program.

Please speak with management for more information regarding this benefit.

Travel Policy

There will be times when employees may be required to travel away from their home city or state for Online Access business. For hourly paid employees, if travel occurs during the employee's normal working hours, that time is paid at the employee's normal rate of pay except for commuting time to the airport (Example 1 - if an employee normally works Monday-Friday 8am to 5pm and commutes to the airport for company business on a Tuesday between 12 pm and 2 pm - which is not compensable - and then waits at the airport from 2 pm and arrives at the destination at 7pm the employee has compensable time from 2 pm to 5pm. Example 2 - if an employee travels to the airport for company business on a Sunday and arrives at 3 pm, the employee has compensable time from 3 pm to 5pm even though Sunday is not a regular work day for this employee). Other non-travel days spent doing the company business away from home will be paid at eight (8) regular time hours.

Every trip will have an appointed "point person" who will be responsible for making decisions and giving approvals while on the trip.

All company travel arrangements must be authorized by the President or Director of Sales and Marketing. The marketing department is responsible for booking the transportation and lodging which is paid in full by Online Access. Included is the travel ticket and one personal checked piece of luggage along with hotel accommodations. Mileage to and from the home airport and parking fees will be reimbursed to the employee at the standard federal business mileage reimbursement rate in effect on the dates of travel (<https://www.irs.gov/tax-professionals/standard-mileage-rates>), Uber, Lyft or taxi services to and from the destination city's airport/hotel will be reimbursed. Necessary transportation while at the event will also be reimbursed. Car rental is only permitted in the event that rideshare or taxi services are not cost effective or are unavailable and must be approved by the event's point person prior to renting. If an employee wishes to travel for personal reasons, he/she will be responsible for the travel fare. These reimbursements will be made upon a properly completed request for reimbursement with all receipts attached with notation of the people involved and the business reason for the charges and the request being signed by the employee and the employee's supervisor, the Director of Sales and Marketing or the President.

Most meals will be enjoyed with the group of traveling employees and paid for by the point person or an Online Access manager or owner. If an employee is on their own for a meal, prudent judgement is expected. Extravagant meals will only be reimbursed up to a reasonable amount determined by Online Access. Hosting of clients or covering client meals or drinks will be at the discretion of the event's point person. A per diem of \$10 per day, to be determined by the Director of Sales and Marketing or the President depending on the location of the event, will be paid to travelling employees for all incidentals including but not limited to snacks, drinks, coffee, etc. The purchasing of alcoholic drinks on a company credit card requires approval by the event's point person. Tipping for meals or taxi/ride share services is 20% maximum.

If an employee is expected to travel three or more times per year, the employee can apply for TSA pre-check and the fees will be reimbursed to the employee by Online Access.

Online Access will not be financially responsible for any personal expenses and travel arrangements. If an employee wants to travel with a spouse or partner, he/she must obtain approval from the President. If approval is granted, Online Access is not responsible for additional accommodations, the spouse or partner's meals, entertainment or any other travel expenses. Any expenses requested to be reimbursed by the employee must be for the employee only.

An employee is responsible for conducting themselves professionally at all times while traveling on company business.

Do:

- Be aware of appearances
- Be aware of Online Access' expectations, your surroundings, the company you
- keep and your safety at all times
- Remember that at all times you are representing Online Access
- Always communicate where you will be with your team
- Update the company about any travel disruptions
-

Don't:

- • Use illegal drugs
- • Drink alcohol to excess or become inebriated
- • Make crude jokes or behave with vulgarity
- • Bully or be unkind to co-workers or other event attendees
- • Drink and drive
- • Go out alone without communicating where you will be with your team

At any time on the trip, the point person has the authority to send an employee home due to perceived or real violations of the above expectations. If sent home, the employee will be subject to a conduct review which could result in disciplinary action up to and including termination.

Employee Safety and Health

Safety

Employees are required to report any work-related injury or illness, no matter how small, to Human Resources. Human Resources will supply, and the employee shall help Human Resources complete, the required injury and illness incident report. In addition, Human Resources will supply, and the employee shall complete, the employee portion of "Employee's Claim for Workers' Compensation Benefits." Online Access will complete and submit the claim to the insurance company as required.

Security

In simplest terms, security is for the purpose of protecting people, Online Access' property, and

information. The security of Online Access' facility, as well as the welfare of Online Access' employees, requires that every individual be constantly aware of potential security risks. An employee should immediately notify his/her supervisor when unknown persons are acting in a suspicious manner in or around the facility, or when keys are lost or misplaced.

Employees entrusted with keys to the office or other Online Access facilities are responsible for the safekeeping of the keys and the security and protection of Online Access property, as well as any activity taking place while the employee is present and the office is closed.

Background Checks

The safety and security of customers and employees is of great importance to Online Access. Because of this, Online Access will conduct background investigations prior to any individual being hired by Online Access. In addition, if an employee changes positions within Online Access, Online Access reserves the right to conduct a new background investigation. Prior to any background investigation taking place, Online Access will present the applicant or current employee with an authorization form, as well as the appropriate notifications.

All information received through a background investigation will be analyzed on a case-by-case basis for its relative impact on the position in question. Applicants and employees will be notified if any adverse employment decision is made based upon the results of a background investigation.

For more information, please speak with Human Resources.

Use of Alcohol, Illegal Drugs or Controlled Substances

The past success and future growth of Online Access is a direct result of its most important asset: its people. Consequently, Online Access is concerned about the use of alcohol, illegal drugs, and controlled substances as it affects the workplace. Online Access respects an employee's personal choices with respect to drug and alcohol use. Online Access is concerned, however, about the use of these substances, whether on or off the job, if it adversely affects an employee's work performance, efficiency, safety or health. In those circumstances, the employee's value to Online Access is seriously impaired.

In addition, the use or possession of these substances on the job constitutes a potential danger to the welfare and safety of other employees and exposes Online Access to the risks of property loss or damage and injury to other persons. Online Access has a vital interest in maintaining safe and efficient working conditions for its employees.

Furthermore, the use of prescription drugs and/or over-the-counter drugs may affect an employee's job performance and seriously impair the employee's value to Online Access. Any employee who is using prescription and/or over-the-counter drugs that may impair the employee's ability to safely perform the job or affect the safety or well-being of others should: (1) inform his/her supervisor that such medications are being taken, and (2) not report for work during the time the employee is using the medication. An employee may be required to provide a doctor's note validating his/her need for time off due to the use of medication which interferes with his/her ability to safely perform his/her job duties. The employee should use any accrued PTO available during this time period. If the employee does not have accrued leave, the employee should discuss his/her need for time off with his/her supervisor or management to determine if an unpaid accommodation may be made.

Proper use of prescription drugs directly prescribed to the employee is exempt from these restrictions so long as the employee is complying with physician orders and use of the drugs does not create a safety hazard for the employee or his/her co-workers.

Please note: the use of marijuana or its chemical derivatives during work hours has been deemed to be a safety hazard to employees, our customers and the general public. Furthermore, its use negatively impacts our employee's ability to provide acceptable levels of customer service. For these reasons, even if the use of marijuana is permitted under state or local laws, Online Access strictly prohibits the use of marijuana or any of its derivatives during or immediately prior to working hours. Testing positive for marijuana may be considered a violation of this policy, regardless of the employee's possession of a medical marijuana license or the legal status of recreational use of marijuana. The following are strictly prohibited by Online Access (this section does not apply to the legal use of prescription drugs):

1. Possession, use, or being under the influence of alcohol while on the job or driving a vehicle rented for company use or while on a business trip.
2. Distribution, sale, or purchase of an illegal or controlled substance while on the job or while at any company function or related business function.
3. Possession, use, or being under the influence of an illegal or controlled substance while on the job or while at any company function or related business function.

Finally, employees should report evidence of alcohol or drug use by another employee to a supervisor or Human Resources immediately. If an employee knows of such use and safety is an immediate concern and that employee does not report his/her information, failure to report this knowledge of a serious safety risk will be considered a violation of this policy.

Violation of the above rules and standards of conduct will not be tolerated, and disciplinary action, up to and including termination of employment, may be taken.

1. Drug Testing

Each employee, as a condition of employment, will be required to participate in pre-employment (unless otherwise notified), reasonable suspicion, random selection, post-accident, and post-rehabilitation testing upon selection or request of management. Any employee who refuses to submit to drug or alcohol testing that has been requested by management will be subject to disciplinary action, up to and including immediate termination of employment. Altered samples, substituted samples, and negative dilutes constitute employee failure to cooperate with a management investigation in violation of Online Access' business conduct policy. Any employee submitting such a sample will be subject to disciplinary action, up to and including immediate termination of employment.

Drug or alcohol testing required or requested by Online Access will be conducted at Online Access' expense.

Testing for the presence of alcohol will be conducted by analysis of breath. Testing for the presence of the metabolites of drugs will be conducted by the analysis of urine.

To ensure the accuracy and fairness of Online Access' testing program, all testing will be conducted according to DHHS/SAMHSA guidelines where applicable and will include a screening test; a confirmation test; the opportunity for a split sample; review by a proper official, including the opportunity for employees who test positive to provide a legitimate medical explanation, such as a physician's prescription, for the positive result; and a documented chain of custody.

For additional information, please see Online Access' full drug testing policy, presented in a separate document.

2. Testing Based on reasonable Suspicion

Anytime a supervisor has reason to believe that an employee is intoxicated or may be using controlled substances or other illegal drugs during work hours or at a time which may affect job performance or safety, the employee will be required to submit a urine sample and/or blood sample for substance abuse analysis. Evidence of intoxication or use of controlled substances may include, but is not limited to: slurred speech, uneven gait, mood swings, violent temper, excessive absenteeism and/or tardiness, and avoidable accidents involving a vehicle or resulting in property damage or a worker's compensation claim.

3. Testing Based on Random Selection

Online Access may conduct drug and alcohol testing each calendar quarter. If the random drug and alcohol testing policy is put into place, each quarter, an outside vendor will utilize randomization procedures to select employees for testing. Employees chosen will be told when and where to report for the test. All employees will be included in the pool for random selection.

4. Post-Accident Testing

Employees of Online Access will be **required** to submit to a drug and alcohol test after any vehicular accident if the employee is fully or partially at fault for an accident during work hours and in a vehicle rented or being used for business purposes. An employee will also be **required** to submit to a drug and alcohol test if the employee is fully or partially at fault for an accident while driving a vehicle rented or being used for business purposes regardless of whether the accident occurred during work hours. Finally, an employee will be **required** to submit to a drug and alcohol test if someone dies or is seriously injured as a result of a vehicular accident occurring during work hours or while driving a vehicle rented or being used for business purposes regardless of whether the employee was cited for a violation.

At management discretion, employees may also be **required** to submit to a drug and alcohol test following other types of workplace accidents and injuries.

5. Employee Consent to Release Chemical Analysis

When Online Access requires an employee to submit body fluids for chemical analysis, the employee must sign an Employee Consent Form authorizing the results to be forwarded to Online Access. An employee who refuses to submit body fluid samples upon request of Online Access or who refuses to execute the Employee Consent Form has failed to cooperate with a management investigation in violation of Online Access' business conduct policy. Such conduct will subject the employee to disciplinary action, up to and including immediate termination of employment.

6. Confidentiality of Test Results

Test results of the chemical analysis of body fluids for substance abuse will be kept confidential in the same manner that all other confidential personnel records and confidential medical records are kept. Upon written request, the employee will be furnished with a copy of his/her substance abuse test results.

7. Analysis of Test Results

Being under the influence of drugs or alcohol on the job or during work hours will be presumed by Online Access to pose a serious safety and health risk. Additionally, any use of alcohol or drugs during non-work time which results in a positive test of the employee during work hours may result in a similar presumption that the use of the drugs or alcohol poses serious safety and health risks.

8. Positive Test

Online Access reserves the right to impose discipline, up to and including immediate termination of employment, upon any employee who tests positive, depending upon the particular situation. Online Access reserves the right to require, as a condition of reinstatement and continued employment, completion of an approved rehabilitation program, at employee expense, which shall include but not be limited to:

- A period of inpatient care
- A return to work test prior to reinstatement
- Follow up testing

Any employee testing positive during or subsequent to a rehabilitation program will be subject to immediate termination of employment.

An employee may challenge a positive drug or alcohol test by requesting a retest of a sample that tested positive. The employee shall pay all costs of such retest. However, if the retest reverses the results of the initial positive test, Online Access shall pay the costs of the retest.

State of Emergency/Inclement Weather

In the event of an extreme weather or other event, such as a blizzard, management will decide as to whether Online Access will temporarily close, or have employees work from home during that period. If management determines that Online Access will close or employees will work from home, management will be responsible to post the notification via the General Office Channel in the SLACK communication app.

Please note: while it is management's responsibility to attempt to notify each employee, it is not management's responsibility to ensure that each employee has actually received notification. Employees are responsible for ensuring that his/her phone number on file is up-to-date, and employees are also responsible for listening to any voicemails or reading any texts sent and checking the General Office Channel in SLACK.

Online Access attempts to monitor the weather conditions for the upcoming day. If it appears there could be an extreme weather event the following day, each employee will be notified to take their laptop home with them in case conditions exist where it would be safer for employees to work from home for a time the following day than to attempt to drive to the office.

If an employee has NOT been notified of a closure, the employee should assume that Online Access will remain open for business and should report to work as normal. When management chooses to remain open, an employee should use his/her best discretion regarding the conditions in his/her area of residence, especially if that area is distant from Online Access' main office. Employees may choose to request to work from home or to take the day off, if he/she feels that the conditions in his/her area of residence present a significant safety hazard to his/her ability to report for work. However, management reserves the right to also evaluate the conditions and employees may be held liable for abuse of the emergency leave policy.

In the event that the St Clair County or Sanilac County Sheriff's Department, governor, president, or other government official declares a state of emergency, CODE RED OR RED ALERT (asking that people cooperate by not driving except in cases of emergency), or a mandatory evacuation impacting either the employee's home or Online Access' office, Online Access will send a communication to each employee with regard to how each individual circumstance will be handled based upon management's knowledge about the situation.

Any time taken off based upon inclement weather, states of emergency, or mandatory evacuations will be on an unpaid basis, regardless of whether management closes Online Access' office. However, employees may choose to use any accrued but unused PTO for this unpaid leave.

Firearms and Weapons

Open carry firearms and weapons **cannot** be brought into the workplace at any time. Online Access' workplace includes all offices, warehouses, vehicles rented or used for business purposes, Online Access' customers' property, and any other location in which Online Access business is conducted. This policy does not prohibit an employee from having his/her legally licensed firearm in the locked trunk of his/her personally-owned motor vehicle or, if the vehicle does not have a trunk, from having a firearm unloaded in a locked compartment or container that is separated from the ammunition for that firearm. Employees who violate this policy are subject to immediate disciplinary actions, up to and including termination of employment.

With regard to employees who are legally licensed to carry a concealed pistol (CPL), Online Access will follow the law as written. Online Access requires an employee to notify management and give Human Resources a copy of their concealed pistol license whether or not they intend to carry on company premises, in vehicles rented or used for business purposes or in customer's homes or businesses. The employee will be given a separate policy on carrying a concealed pistol on company premises, in vehicles rented or used for business purposes or in customer's homes or businesses, etc.

Workplace Violence

Online Access has a zero-tolerance policy for workplace violence, verbal and nonverbal threats, and related actions.

Employees should immediately report to their supervisor such incidents or threats. Online Access encourages employees to suggest ways to reduce or eliminate these risks. Online Access will not retaliate against any employee for reporting such an incident, and Online Access will not knowingly permit any retaliation by management or non-management employees.

Standard of Conduct

Customer Service and Confidentiality

This policy provides general guidance on the ethical principles that all employees must follow, but no guideline can anticipate all situations. Each employee should be guided by basic honesty and good judgement and be sensitive to others' perceptions and interpretations. Employees are expected to disclose to management anything that may violate this policy. Retaliation or retribution will not be tolerated against anyone who brings violations to management's attention.

It is sometimes easy to take a customer for granted, but if Online Access does, Online Access runs the risk of losing not only that customer, but his/her associates, friends, or family who may also be customers or prospective customers.

Online Access takes great pride in the many ways its employees go the extra mile for customers. Online Access expects the highest standard of ethical conduct and fair dealing from each employee and officer of the company as the company's reputation is a valuable asset and Online Access must continually earn the trust, confidence, and respect of its customers and community.

The importance of professional conduct when working with Online Access' customers cannot be emphasized enough. Professional conduct is a broad term that is open to many interpretations. The following are guidelines for appropriate conduct:

- Online Access affairs may not be discussed with customers, other employees who do not have a need to know, or any other individual.
- Refrain from discussing shortcomings or idiosyncrasies of customers or other employees.
- Avoid conversation involving customer matters in all public places.
- Avoid discussing procedural problems with management while customers are present.
- Borrowing money from a customer is not permitted.
- Online Access employees may not solicit customers for personal charitable donations.
- Online Access employees may not conduct themselves inappropriately with customers.
- Employees may not conduct business with customers outside of official work duties.

Each employee must be sensitive to the importance of providing courteous service in all working relationships.

Online Access' professional ethics also requires that each employee maintain the highest degree of confidentiality when handling customer affairs. In order to maintain this professional confidence, no employee shall disclose customer information to outsiders, including other customers or third parties and individuals of one's own family.

Furthermore, it is expected that every employee will behave in the most appropriate manner while in the company's main office while at tradeshows, conventions or customer's business or personal property. Appropriate behavior includes, but is not limited to:

- Employees cleaning up after themselves.
- Speaking respectfully.
- Using professional voices and language.
- Not over-indulging with alcoholic beverages.

Examples of behavior that is NOT acceptable in the company's office, while at tradeshow, conventions, customer's business or personal property or in a vehicle rented or being used for business purposes include, but are not limited to:

- Foul language.
- Coarseness.
- Being negative.
- Tasteless behavior.
- Insubordination or argumentative behavior.
- Being inebriated

Please be aware that the customer has a choice of marketing companies. Online Access wishes to be the marketing company of choice for our industry. Each employee's behavior affects the customer's choice either positively or negatively. Questions concerning customer service and confidentiality or in-house issues should be addressed to the employee's supervisor.

Business Conduct

A key element to Online Access' continued success is each employee's commitment to be guided by certain standards and principles in performing his/her job. It is important that employees be guided by the following:

- Adherence to all applicable federal, state, and local laws and regulations.
- Protection of Online Access' reputation and assets.
- Responsible action that avoids conflicts of interest and other situations potentially harmful to Online Access.
- Being ethical and honest, including providing truthful information in response to any management inquiry or investigation.
-

Online Access considers work rules, guidelines, and work performance important responsibilities. They are essential to the proper management of Online Access' business and ensure that employees work together effectively. When these rules and guidelines are not followed or an employee's work performance is below Online Access standards, disciplinary actions, up to and including termination of employment, may be taken.

Professional Appearance

As an employee of Online Access, it is expected that each employee will present a clean and professional appearance. Although our typical dress code is relaxed and casual, all employees are expected to maintain the highest standards of personal cleanliness at all times, including an appearance that is neat, clean, well-groomed and typifying proper hygiene. Research has shown that employees feel more professional, act more professional and treat other employees and customers in a more professional way based upon a professional appearance. All personnel are required to dress appropriately while working. Good judgment and taste is always required.

Professional hygiene includes many aspects, and different individuals require different specifics to ensure proper hygiene. However, Online Access recommends that all employees shower daily, use deodorant products and be neatly groomed.

Regardless of an employee's job title, items of clothing that display sexual or other potentially offensive statements, logos or designs are strictly prohibited whenever an employee is performing in any capacity related to Online Access. Employees who report to work inappropriately dressed may be asked to leave and return in acceptable attire.

Duty to Report

An employee has a duty to report to Online Access all convictions of or citations for any crime, whether the law violation was federal, state or local, regardless of the severity of the crime and regardless of whether such violation occurred during or outside of work hours. In addition, an employee has a duty to report knowledge of a warrant being issued for his/her arrest. Finally, an employee must report any civil lawsuits filed against him/her.

Failure to report convictions, citations or warrants may result in disciplinary action, up to and including termination of employment. At Online Access' discretion, violation of federal, state or local laws may also result in disciplinary action, up to and including termination of employment.

Prohibited Conduct

The following is not meant to be a total list of all work rules, but, rather, is illustrative of the type of conduct that will not be tolerated by Online Access. This statement of prohibited conduct does not alter Online Access' policy of at-will employment.

1. Making false statements or omitting pertinent information on Online Access applications, records of employment, forms, or reports, or in the course of participation in Online Access investigations or in responding to management inquiries.
2. Insubordination: Refusal to obey work orders of supervisors, refusal to perform job assignments, or the use of abusive or threatening language toward a supervisor or member of management.
3. Committing any act of violence, threats or intimidation, fighting, or using abusive or profane language on Online Access or customer premises.
4. Speaking to other employees, whether they are supervisors, peers, or subordinates, in a manner that does not respect the individual's inherent dignity.
5. Theft, unauthorized removal, or willful damage of property or resources belonging to Online Access, Online Access' employees or customers.
6. Obtaining sales of service or product through false or fraudulent representation to the customer or to a 3rd party payer with or without the knowledge of the actual customer.
7. "Moonlighting" or providing services that Online Access provides to its targeted industries without doing so through appropriate Online Access procedures.
8. Selling or distributing Online Access material or data outside of that necessary to conduct official company business.
9. Disregard of safety rules and practices and security regulations, including horseplay, wrestling, dangerous practical jokes, or throwing objects.
10. Possession of dangerous or unauthorized materials, such as explosives or firearms, in the workplace, except as laid out in the firearms section below.

11. Unauthorized operation of machinery and equipment or operation of any machinery or equipment that an employee is not trained and authorized to operate.
12. Unauthorized entry or exit from Online Access property at any location at any time, such as an employee leaving the workplace without properly notifying his/her supervisor.
13. Substandard or unsatisfactory work performance.
14. Repeated absences or tardiness, including unreported absences.
15. Gambling, in any form, on Online Access premises.
16. Distribution of non-Online Access written materials during working time; distribution of non-business or non-Online Access literature in working areas; littering; solicitation of or by employees during working time in the workplace. "Working time," as used in this rule, does not include designated breaks, meal periods, or before or after work.
17. Sleeping or deliberately loafing during working hours.
18. Failure to fully cooperate with any Online-Access investigation as required by management.
19. Any other conduct that is prohibited by law. There is no substitute for good judgment and common sense.

Engaging in any of these prohibited actions, as well as any other violations of the employee handbook, may result in disciplinary action up to and including immediate termination of employment.

Social Media

For the purposes of this policy, the term "social media" includes any internet-related blog, wiki, online social network or any other form of online publishing or discussion.

Online Access recognizes that many employees may use the Internet for personal reasons away from work to create or participate in a blog, wiki, online social networks or other forms of online publishing or discussion. Online Access does not discourage off-work use of the Internet for these purposes. However, except as required as part of an employee's specific job duties, employees are prohibited from using social media during work hours, using either Online Access or personal computer equipment.

In connection with an employee's use of social media, the following conduct is prohibited:

- Knowingly making false statements that are intended solely to harm the reputation of Online-Access employees, managers, supervisors, senior management, officers, owners and/or customers.
- Knowingly making false statements that are intended solely to harm the reputation of Online-Access products or services.
- Disclosing Online Access' trade secrets (development of systems, processes, products, know how, business plans, technology, customer lists, etc.) or other confidential proprietary information of others, including private and/or personal information (financial information, social security numbers, etc.), related to: (a) customers or (b) Online Access employees, managers, supervisors, senior management, officers or owners.
- Making discriminatory or harassing comments that violate federal, state or local laws and/or would be prohibited by Online Access' anti-discrimination/anti-harassment policy or otherwise engaging in any conduct prohibited by Online Access' anti-discrimination/anti-harassment policy.

- Making threats of physical injury or property damage to any employee, manager, officer, director or owner including threats concerning their respective family members or personal property.
- Disclosing customer names, customer information or the work Online Access performs for such customer, unless such information is already in the public domain (e.g. listed on Online Access' website).
- Posting images, including photographs or drawings, depicting the confidential, personal and/or health-related information of Online Access' customers.
- Making an endorsement in support of Online Access, its products or services on any social media, email, blog, forum or other internet-related media, even if using a personal account, without disclosing his/her relationship with Online Access.
- Violating any intellectual property law, such as copyright, trademark and/or financial disclosure law, in a manner that affects Online Access.

If an employee participates in online social networks and identifies his/herself as an employee of Online Access, the employee should ensure his/her profile and related content is an accurate and fair representation of his/her relationship with Online Access. Employees control and, therefore, are personally responsible for the content they publish on social media, blogs, wikis or any other form of user-generated media. The content an employee publishes will be available online for a long time. Employees are required to keep information they publish current and up to date if it relates to Online Access.

This policy does not prohibit and will not be interpreted or enforced in a manner which could interfere with, restrain or coerce employees from engaging in activities protected by the National Labor Relations Act.

Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

Any questions regarding this policy should be directed to management.

Conflicts of Interest

Online Access' employees are expected to devote their best efforts and attention to the full-time performance of their jobs. Employees are expected to use good judgment, adhere to high ethical standards and avoid situations that create an actual or potential conflict between the employee's personal interests and the interests of Online Access.

A conflict of interest exists when an employee's loyalties or actions are divided between Online Access' interests and those of another, such as a competitor, supplier or customer. Both a conflict of interest and the appearance of a conflict of interest should be avoided. An employee who is unsure as to whether a certain transaction, activity or relationship constitutes a conflict of interest or the appearance of a conflict of interest should discuss the situation with his/her immediate supervisor for clarification.

This policy does not attempt to describe all possible conflicts of interest that could develop. Some of the more common conflicts from which employees should refrain, include the following:

1. Accepting personal gifts or entertainment from competitors, customers, suppliers or potential suppliers. Exceptions may be made for gifts or refreshment that are infrequent

- and of less than \$25 in value or are authorized by management.
2. If someone wishes to make a gift of greater than \$25 and it would create a customer service issue to refuse the gift, employees must report the incident immediately to management who will either return the gift or donate it to a suitable charity.
 3. Working for a competitor, supplier or customer while employed by Online Access.
 4. Engaging in self-employment in competition with Online Access.
 5. Disclosing Online Access trade secrets or confidential proprietary information for personal gain to Online Access' detriment.
 6. Having a direct or indirect financial interest in or relationship with a competitor, customer or supplier, except that ownership of less than 1% of the publicly traded stock of a corporation will not be considered a conflict.
 7. Using Online Access assets, including computers and tools, or labor for personal use. When an employee's interest is adverse to Online Access' interest, the employee will not be authorized to use Online Access computers or other Online Access assets that can be used for the employee's personal gain.
 8. Acquiring any interest in property or assets of any kind for the purpose of selling or leasing it to Online Access.
 9. Committing Online Access to give its financial or other support to any outside activity or organization except within the ordinary course and scope of employment.
 10. Developing a personal relationship with a subordinate employee of Online Access that might interfere with the exercise of impartial judgment in decisions affecting Online Access or any employees of Online Access.

If an employee or someone with whom the employee has a close personal relationship (a family member or companion) has a personal, financial or employment relationship with a competitor, supplier or customer, the employee must disclose this fact in writing. If an actual conflict of interest is determined to exist, Online Access may respond to this perceived conflict as Online Access deems appropriate based upon the circumstances.

Employees may pursue and participate in employment or other business activities outside of normal working hours provided such arrangement neither creates a conflict of interest nor detracts from performance and/or effectiveness while working for Online Access and provided the employee does not offer or provide such services to Online Access. Any employee who has other employment must disclose such employment to his/her supervisor so that an evaluation can be made as to whether a conflict of interest exists.

Failure to adhere to all aspects of this policy may result in disciplinary action, up to and including termination of employment.

Confidentiality and Trade Secrets

As a condition of initial and continued employment with Online Access, all current and former employees are expected to conduct themselves in a manner that protects and preserves Online Access' proprietary, confidential and trade secret information. "Trade secret" means information, including customer information formula, pattern, compilation, program, device, method, technique, or process, that:

- Derives independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use; and
- Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.

The following are examples of trade secret information that must be maintained in a confidential manner by employees and former employees.

1. Business matters relating to marketing, costs, profits, and pricing methods.
2. The details or provisions of any private written or oral contract or understandings between
3. Online Access and a third party, including customers and vendors.
4. The details of any statistical data, training manual, financial statements, forms, techniques, methods, or procedures not generally known to competitors of Online Access.
5. Procedural, training, or instructional manuals which have been developed by Online Access and that are not generally known to the public.
6. Long-range plans, budgets, acquisition strategies, methods of operations, pricing, bid information, and financial performance belonging to Online Access and not generally known to the public.
7. Computer software and programs, proprietary information, and other data relating to aspects of Online Access finances or unique operations that cannot be obtained from sources other than Online Access.
8. Other confidential information that provides Online Access with a substantial competitive
9. advantage in conducting its business that has not, by legitimate means, become generally known and in the public domain.
10. Names, addresses, transactions and any related information pertaining to Online Access' customers that has been aggregated by Online Access which in combination constitute confidential information.
11. Confidential employee information.is all Information protected by the Uniform Trade Secrets Act and any state version thereof.

Any and all company financial information is completely confidential and should only be discussed for business purposes with appropriate personnel. All confidential information must be secured in desk drawers and cabinets at the end of each business day. Should an occasion arise in which an employee is unsure of his/her obligations under this policy, it is the employee's responsibility to consult with his/her immediate supervisor.

Any violations of this policy may result in disciplinary action, up to and including termination of employment.

Anti-Harassment and Anti-Discrimination

Online Access is committed to providing a work environment free of unlawful discrimination and harassment, including sexual harassment. Management encourages healthy socializing among its employees; however, all employees, especially management, must be sensitive to behavior that may be considered offensive by other employees or the general public. All employees, including management, must refrain from engaging in such conduct.

Company policy prohibits unlawful discrimination, sexual harassment, and/or harassment based on race, color, creed, sex (including pregnancy, childbirth, or related medical condition), gender, religion, marital status, age, national origin or ancestry, physical or mental disability, height, weight, genetic information, veteran status, or any other consideration made unlawful by federal, state, or local laws (“protected classification”). It also prohibits unlawful discrimination and/or harassment based on the perception that anyone has any of those characteristics or is associated with a person who has or is perceived as having any of those characteristics. All such discrimination, sexual harassment, and/or harassment is unlawful and prohibited by Online Access.

Online Access’ anti-discrimination/anti-harassment policy applies to all persons involved in the operation of Online Access, including all company employees, supervisors and those in management, as well as all persons doing business with or for Online Access including vendors, customers, independent contractors, and others who enter the workplace (i.e. “third parties”). Online Access’ anti-discrimination/anti-harassment policy prohibits unlawful harassment by any employee of Online Access (including supervisors, managers, and co-workers of the above-listed persons) or by any third party. Applicants, employees, unpaid interns, volunteers, and independent contractors are all protected from discrimination, sexual harassment, and/or harassment under this policy.

Discrimination and harassment based on a job applicant or employee’s protected classification (defined above) is against state and federal law.

Sexual harassment is a form of gender discrimination. Both state and federal law prohibit discrimination and harassment based on a job applicant or employee’s gender.

There are two recognized types of sexual harassment under state and federal law: *Quid pro quo* and hostile work environment. The definitions of both forms of sexual harassment are as follows: “*Quid Pro Quo*” *Sexual Harassment*. This type of harassment includes unwelcome sexual advances, requests for sexual favors, or other verbal, visual, or physical conduct of a sexual nature when:

- Submission to the conduct is made either explicitly or implicitly a term or condition of an employee’s employment, or
- Submission to or rejection of the conduct by an employee is used as the basis for employment decisions affecting that employee.

“*Hostile Work Environment*” *Sexual Harassment*. This type of harassment includes:

- The employee affected was subjected to harassing conduct directed toward him/her, or the employee personally witnessed the harassing conduct, and it took place in his/her immediate work environment.
- The employee’s gender was a motivating factor for the harassment.
- The conduct is unwelcome and sufficiently severe or pervasive that it has the purpose or effect of altering the conditions of employment and creating an intimidating, hostile, abusive, or offensive working environment.
- The environment created by the conduct would have been perceived as intimidating, hostile, abusive, or offensive by a reasonable person in the same position as the affected employee; and
- The environment created was perceived by the affected employee as intimidating, hostile, abusive, or offensive.

Prohibited unlawful harassment based upon sex (gender or pregnancy), or other protected characteristics (age, race, national origin, etc.) includes, but is not limited to, the following behavior:

- Verbal conduct such as epithets; derogatory jokes or comments; slurs; or unwanted sexual advances, invitations, or comments.
- Visual conduct such as derogatory and/or sexually oriented posters, photography, cartoons, drawings, or gestures.
- Physical conduct such as assault, unwanted touching, blocking normal movement, or interfering with work.
- Threats and demands to submit to sexual requests as a condition of continued employment or to avoid some other loss, and offers of employment benefits in return for sexual favors;
- Retaliation for having reported or threatened to report harassment.

Sexual harassment (and other forms of harassment) can occur between any individuals, regardless of each person's sex, gender, or other membership in a protected class. It can also occur regardless of each individual's position within the organization or related to the other individual. Harassers can be a superior, subordinate, co-worker, or anyone in the workplace, including an independent contractor, temporary employee, vendor, customer, or visitor.

Furthermore, sexual harassment can occur both inside and outside the immediate work environment or workday. Harassment can occur while employees are traveling for business or at company-sponsored events or parties. In addition, calls, texts, emails, and social media usage by employees can constitute unlawful harassment, even if they occur away from the workplace, on personal devices, or during non-work hours.

Online Access needs, expects, and encourages employees to come forward, without delay, should he/she suspect that any form of discrimination, sexual harassment, and/or other harassment has occurred in the workplace. Online Access takes all complaints regarding discrimination, sexual harassment, and/or harassment in the workplace seriously. If an employee feels that he/she has been subject to discrimination, sexual harassment, and/or other harassment, he/she should notify management immediately using Online Access' Complaint Reporting Procedure (presented in Section 1). Discrimination, sexual harassment, and/or harassment in the workplace will not be tolerated.

Any employee, regardless of position or title, whom Online Access determines has engaged in discrimination, sexual harassment, and/or other harassment in violation of this policy, will be subject to discipline, up to and including termination of employment.

Complaint Reporting Procedures – See Employment Policies

Anti-Retaliation

In addition to prohibiting discrimination and harassment in the workplace, state and federal law also prohibits retaliation. One type of retaliation occurs if Online Access were to take adverse action against an employee who complains about harassment or discrimination if such action may likely discourage a reasonable employee from making or supporting a claim of harassment or discrimination. Harassment and discrimination may be based on a protected status as outlined in the Online Access Equal Employment Opportunity policy, as well as protected activities such as testifying at or providing information related to a labor investigation, filing or having filed a

workers' compensation claim, or whistleblower status. Examples of adverse action may include, depending on the circumstances, demotion, failure to promote, termination of employment, change of work hours, or change of job duties. Another type of retaliation occurs when co-workers ostracize, employ derogatory epithets (verbal, written, or gestural) against, or otherwise harass an employee because he/she has complained about discrimination or harassment.

It is illegal to retaliate against an employee because he/she complained about harassment or discrimination, even if no harassment or discrimination ever happened. Online Access policy **STRICTLY PROHIBITS** any form of retaliation against an employee because he/she complained about harassment or discrimination. If an employee feels that he/she has been retaliated against based on a complaint, please notify management immediately.

Workplace Bullying

Bullying in the workplace is strictly prohibited. Bullying is usually seen as acts or verbal comments that could mentally hurt or isolate a person in the workplace. Bullying can, but does not need to, involve negative physical contact as well. Bullying usually involves repeated incidents or a pattern of behavior that is intended to intimidate, offend, degrade or humiliate a particular person or group of people. It has also been described as the assertion of power through aggression. Bullies can be any coworker, including subordinates, peers and supervisors.

There is a distinction between strong management and bullying. Comments that are objective and are intended to provide constructive feedback are not usually considered bullying but, rather, are intended to assist the employee with his/her work.

An employee who feels that he/she is being bullied in the workplace should bring the situation to the attention of his/her immediate supervisor, any other supervisor or management. Bullies will be subject to disciplinary action, up to and including termination of employment.

Workplace Relationship / Fraternization

To avoid the appearance of any conflict of interest, influence, or favoritism, and to ensure objectivity in the workplace, the Company prohibits personal relationships (e.g., romantic or dating relationships, cohabitation, marriage, or otherwise becoming related) between employees in a reporting relationship.

If a personal relationship develops between employees in a reporting relationship, the employees must disclose the relationship immediately to Human Resources who will work with the employees to devise a working solution.

Any failure to disclose such personal relationships between employees in a reporting relationship to Human Resources may result in discipline, up to and including termination.

All steps will be taken to eliminate any real or perceived appearance of authority one employee has over the other employee. Continued employment is possible provided that no direct reporting relationship exists. In situations where it is not possible to eliminate a real or perceived conflict of interest, transfer or termination of employment with the Company may be required.

Questions, Suggestions, and Ideas

Online Access is always interested in its employees' constructive ideas and suggestions for improving its operations.

Open communication is the way to have an issue reviewed and to establish a basis for better understanding. Because of this, employees are encouraged to have open discussions with their supervisors so that appropriate action may be taken if management determines this is required. If an employee's supervisor cannot be of assistance, the Human Resources department is available for consultation and guidance.

In addition, employee suggestions may be submitted in writing to the employee's supervisor. After management investigates the employee's written suggestion, he/she will be notified regarding whether it is feasible to be put into practice.

Regardless of the method or steps taken by an employee, management at all levels is willing to listen to a suggestion or complaint, as well as attempting to help bring about a solution or clarification. While there may not always be automatic answers to every situation, Online Access employees have an avenue open at all times to resolve problems as they may arise.

Online Access believes that suggestions indicate initiative; therefore, an employee's written suggestion will be kept on file, and it will be considered as part of that employee's performance review.

Finally, management is also interested in hearing positive things that are happening within the company! A positive attitude can go a long way in working together as a team, having good company morale, and having a pleasant place to work. Because of this, peer-generated positive reports will be taken very seriously and are much appreciated!

General Policies

Vehicles

Personal vehicles may be parked in the approved parking spots at the office. Online Access is not responsible for any loss, damage, or theft from personal vehicles. Therefore, Online Access recommends that all unattended personal vehicles are locked and valuables are removed from sight.

It is imperative that all employees operating vehicles rented or being used for Online Access business use safe driving techniques. Speeding, running red lights or stop signs, unsafe lane changes, "tailgating" and other inappropriate driving actions are incredibly dangerous and they reflect poorly on Online Access' image within the community and potential customer base. As a result, these behaviors will not be tolerated.

All employees of Online Access are required to wear seatbelts at all times while driving vehicles rented or being used for Online Access business or on company time. Failure to do so will be considered a violation of this policy.

If an employee is involved in a vehicular accident in either a vehicle rented or being used for Online Access business or on company time, the following regulations apply:

- the accident must be reported immediately to management, regardless of time of day.
- Management will respond to the scene of the accident immediately, regardless of time of day, unless the accident occurred in a city outside of the local area where the business location is in order to make sure that proper company procedures are followed. If the accident took place away from the business location, management will defer to the police department on site of the accident.
- the employee will be required to immediately call the local police department, regardless of the severity of the accident or the individual suspected to be "at fault" for the accident.
- depending on the circumstances, employees may be held liable for any deductibles associated with repairing vehicles rented or being used for Online Access business when those repairs result from an employee's negligent or criminal behaviors.

Furthermore, Online Access has a zero-tolerance policy regarding the use of cellular telephones for hand-held talking or text messaging (both sending and receiving) while operating a vehicle. This zero-tolerance policy applies to all driving while an employee is "on-the-clock" or driving a vehicle rented or used for company business. Employees may not use a cellphone in any manner, except when using a hands-free device, under these circumstances. The one and only exception is contacting emergency services.

Violations of this policy will result in disciplinary action, up to and including termination of employment.

Smoking

Online Access' policy and state law prohibits smoking in any enclosed company facility. This includes all portions of the main office as well as all other enclosed facilities. This policy applies to all employees, subcontractors, customers and visitors. Smoking shall be permitted only at a reasonable distance from outside entrances. The success of this policy will depend on the thoughtfulness, consideration and cooperation of both smokers and nonsmokers. All employees share in the responsibility for adhering to and enforcing this policy.

Smoking by Online Access employees during work hours or while otherwise representing Online Access is governed by the following rules:

- smoking is prohibited within the Online Access building. Employees wishing to smoke must leave the building prior to smoking.
- employees choosing to smoke outside must properly dispose of all smoking-related trash.
- Littering will not be tolerated.
- smoking is prohibited in vehicles rented or being used for Online Access business.
- all regulations apply equally to all types of smoking, including traditional cigarettes, electronic cigarettes, cigars, pipes and other smoking products.

Employees are reminded that smoking can impact the company's image in customers' eyes. Employees are expected to take whatever measures necessary to not smell like smoke while in a customer's business. If Online Access receives a complaint from a customer regarding a smoke

smell in his/her home or business emanating from an employee, it will be considered a violation of this policy.

Violations of this policy will result in disciplinary action, up to and including termination of employment.

Cellular Telephones

Personal cellphones may be kept on an employee's person during work hours. However, excessive personal use that distracts from one's duties is not allowed.

Employees are prohibited from using certain cellphone functions while operating any motor vehicle on Online Access business. The prohibited functions include hand-held calls and text messaging (both sending and receiving), as well as all other functions not utilizing a hands-free device. Employees are permitted to use hands-free devices while driving, but they are encouraged to stop in a safe location (e.g. parking lot) before completing any lengthy calls. For the purposes of this policy, "operating a motor vehicle" shall include any time a vehicle is within the flow of traffic, including while stopped at a stop sign or red traffic light. In addition, any vehicle operated for Online Access purposes or while an employee is "on the clock" is included in this policy, regardless of whether the vehicle is rented for Online Access or the employee's personal vehicle. The one and only exception is contacting emergency services.

Employees who are in violation of this policy will be subject to disciplinary action, up to and including termination of employment.

Expense Reimbursement

Expenses incurred in connection with Online Access' business will be reimbursed. All expenses must be approved by management prior to being incurred as well as verified before reimbursement. Claims for reimbursement must be submitted on the Expense Reimbursement form, which is available from management. Expense reports must: (1) be prepared monthly, (2) contain the reimbursable expenses incurred during the prior 30-day period along with supporting documentation (e.g. receipts for meals, mileage reports), when a meal was paid for and is asking to be reimbursed, the people who ate that meal must be listed and the reason for the meal must be recorded on the receipt, (3) be signed by the employee, (4) be submitted to management on the first day of the month, and (5) be approved by management.

Company Property

Use of Company Property

Online Access provides furniture, desks, storage areas (e.g. drawers, lockers, files and cabinets), work areas, computers, communication systems (including land line telephones, electronic mail, and other systems) and other Online Access-provided equipment/facilities. These assets are referred to collectively as "Online Access assets." These Online Access assets are provided to employees at Online Access' expense to assist employees in carrying out Online Access business.

Online Access assets belong to Online Access and Online Access reserves the right (at any time and without notice) to access, inspect, inventory or search any Online Access asset. Items or information of a personal nature may be discovered in the course of any such exercise. Employees consent to such access by accepting and using Online Access assets.

Furthermore, all documentation related to business processes and responses to customer calls for service are considered Online Access property. As such, this property may not be used by employees for their personal gain. Online Access property may not be removed from Online Access premises without the proper authorization of management. If an employee loses, breaks, or damages any property, he/she should report it to his/her supervisor immediately.

Failure to respect Online Access property and use it with due care will result in disciplinary action, up to and including termination of employment.

Business Telephones

For purpose of training and quality control, all telephone calls to and from the business telephones of Online Access will be recorded.

Online Access recognizes that employees may need to make personal telephone calls from time to time. Please keep in mind that Online Access phone lines are generally intended for business use and all calls are recorded. Personal calls should be limited in both frequency and duration. No long-distance calls are to be made without advance supervisor approval and the cost of such calls must be reimbursed upon completion. Abuse of telephone privileges will lead to disciplinary action up to and including termination of employment.

Employee Image Use

Online Access has the right to take photographs and videos during working hours or during work-related functions of all employees. These pictures and videos remain the property of Online Access, and these pictures and videos may be used for business-related purposes, including, but not limited to, the company website, social media, marketing, and training materials.

The creation and use of pictures and videos do not create an employment contract and in no way alter the employment at-will policy of Online Access. Online Access is under no obligation to remove any pictures or videos taken of an employee after any termination of employment, regardless of whether that separation is initiated by the employee or Online Access.

Electronic Communication

Online Access' e-mail systems are intended to be used for business-related purposes. Online Access treats all messages sent, received, or stored in its e-mail systems as business messages and all of these messages are considered Online Access property.

Online Access has the capability to access, review, copy, and delete any messages sent, received or stored on the e-mail system, Online Access computers, electronic and Internet resources and the message recording and storage systems of any other Online Access asset. Online Access reserves the right to search any Online Access asset for any purpose and to disclose any information or

property to any party (inside or outside Online Access) it deems appropriate. By using Online Access assets, an employee agrees that he/she has no reasonable expectation of privacy in relation to such usage or any items or information stored in Online Access assets. Should employees make use of the e-mail systems or any other Online Access asset to transmit or receive personal messages, such messages will be treated no differently than other messages (i.e. Online Access reserves the right to access, review, copy, delete or disclose them for any purpose). Accordingly, employees should not use Online Access assets to send, receive or store any messages that they wish to keep private. Users should treat computer and e-mail systems like a shared file system – with the expectation that messages sent, received or stored on the system (including individual hard disks, chips and other memory storage devices) will be available for review by any authorized representative of Online Access for any purpose.

Use of the e-mail system to copy and/or transmit any documents, software or other information protected by copyright laws is prohibited and will result in disciplinary action, up to and including termination of employment.

To use electronic communication tools effectively, employees should follow these guidelines:

1. Emails and instant messages are not a substitute for oral communication. If an employee has a matter of importance to discuss, do so in person.
2. Business etiquette is to be utilized in drafting messages.
3. Announcing late arrivals or early departures over instant messaging, email or text is not a substitute for proper approvals. Please follow Online Access attendance policies.
4. Network security procedures are to be followed at all times.
5. Never open attachments from an unknown source and always make sure anti-virus software is running and virus definitions are up to date.
6. Do not send confidential, proprietary or trade secret information via instant message.
7. Do not send emails or instant messages under another employee's login ID.
8. Off-color humor, foul, inappropriate, offensive or discriminatory language and harassment of any kind are prohibited.
9. Do not clog the e-mail system with superfluous forwards or mass emails.

Improper use of emails or instant messages may result in discipline, up to and including termination of employment.

Internet Access

Internet access is provided with Online Access computers and equipment to allow employees access to information and resources for Online Access purposes and in order to enable employees to perform their job duties more efficiently.

Employees are urged to use their common sense and judgment. If an employee uses Online Access equipment for personal business, there is no right to privacy and any information transmitted, including personal information, may be reviewed by Online Access.

Accessing pornographic, offensive or other inappropriate information in violation of Online Access policy is expressly prohibited. This prohibition includes, but is not limited to:

- Use of personal equipment while on-the-clock.
- Use of personal equipment while on company or customer property, including vehicles rented or being used for Online Access business, regardless of whether on or off the clock.
- Use of company-owned equipment, including computers, regardless of whether on or off the clock.

Computers/Monitors

Online Access provides certain employees with laptop computers and monitors. Employees should keep in mind that Online Access-provided hardware remain the property of Online Access. As such, this equipment must be used with care. Online Access understands that accidents and equipment failure can and do happen. However, if this equipment is either misplaced or damaged due to negligent or careless behavior on the part of the employee, the employee is financially responsible for replacing the equipment. It is solely the responsibility of management to determine if damage to the equipment was the result of careless or negligent behavior.

Computers are intended to be used for business purposes and must be kept secure by the employee at all times while in the employee's possession. Employees may NOT use this equipment for personal purposes.

Downloading unauthorized applications onto the hardware owned by Online Access, regardless of whether they are for personal or business use, is strictly prohibited. All applications must be pre-approved in writing by management. If management requires certain applications be downloaded for business reasons, they will either instruct employees to bring their company-owned devices to the office where someone will assist in the download process or notify all employees, in writing, regarding the procedures required to download that specific application. Unauthorized downloading of applications will be considered a violation of this policy.

Computer Software Licensing

Online Access purchases or licenses the use of various computer software programs. Neither Online Access nor any of Online Access' employees has the right to duplicate this computer software or its related documentation. Unauthorized duplication of computer software is a federal offense, punishable by up to a \$250,000 fine and up to five years in jail.

Online Access does not condone the illegal duplication of software. Employees must use the software in accordance with the license agreement. This policy applies not only to individual desktop computers and laptops but to local area networks as well.

Employees learning of any misuse of software or related documentation within Online Access shall immediately inform a supervisor. Employees who reproduce, acquire or use unauthorized copies of computer software will be subject to corrective action, up to and including termination of employment.

Company Credit Cards

Certain employees will be issued company credit cards to use for business-related purchases. These credit cards may only be used for authorized purchases. Purchases on company credit cards must receive approval from management prior to the purchase, although management may, at its option, extend a general approval for purchases made for specific products or vendors.

Employees may not use the company credit cards for personal purchases.

Employees must provide an itemized receipt for *every* purchase made on a company credit card. When a meal was paid for with a company credit card, the people who ate that meal must be listed and the business reason for the meal must be recorded on the receipt. For all other charges, a **business reason** must be listed on each receipt. All receipts must be submitted to Accounts Payable within three business day **or one business day upon returning from a business trip.**

Employees are responsible for any cards assigned to them. Cards should not be “loaned” to any other individual, including other employees, without management’s permission. Furthermore, employees are expected to immediately notify management if assigned cards are lost or stolen.

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

Management Responsibilities

Personal Information

Management is responsible for maintaining all personnel records. Online Access’ policy requires all employees’ personnel files to be maintained confidentially and stored in a secure location. This is Online Access’ practice and only those with a business “need to know” will be permitted to view an employee’s file, except where required by law.

An employee who wishes to review his/her own file should contact Human Resources. Human Resources will provide the employee with a time when he/she can view his/her file in Online Access’ main office. All employee files must be viewed within the presence of a Human Resources representative. If an employee wishes a copy to be made of his/her file, he/she may request a copy. All copies must be picked up in person at the main office.

Management and supervisors should always have current information for each employee. Employees must promptly notify management of changes in name, address, telephone number, marital status, number of dependents, or next of kin and/or beneficiaries. Employees must also provide up-to-date information regarding an individual who should be contacted in case of an emergency (e.g. accident at work).

Social Security Number Privacy

In accordance with the Michigan Social Security Number Privacy Act, Online Access has established a policy to protect social security numbers. The following provisions are in place based upon this legislation:

- Social Security Numbers will not be disclosed to third parties unless: (1) Online Access is legally required to do so; (2) it is necessary to maintain company records; or (3) an employee specifically requests such disclosure in writing.
- No more than the last four digits of an employee's social security number will appear on any documentation regarding the employee's compensation, withholding amounts, or wage deductions, except when required by law.
- Any records containing Social Security numbers are stored under lock and key, or, if maintained electronically, under password protection, with access available only to Human Resources. Supervised access to paper records containing Social Security numbers is available on a need-to-know basis only.
- Employee records in the company's possession are saved in accordance with Online Access' document retention policy. Paper records or those stored on portable electronic media shall be shredded or physically destroyed. Electronic records on "hard disk," along with all backup copies, shall be permanently deleted, cleaned and sanitized.
- Employees found to have violated any element of the above privacy policy will be subject to disciplinary action up to and including termination.

If an employee becomes aware of a breach in maintaining the confidentiality of his/her social security number information, the employee should report the incident to management immediately.

EMPLOYEE ACKNOWLEDGMENT

I hereby acknowledge receipt of the **Online Access, Inc. Employee Policies and Procedures Handbook**. I understand that it is my responsibility to become familiar with the contents of this handbook and I agree to follow the policies and procedures contained therein. I acknowledge and agree that this Employee Handbook supersedes all other handbooks, policies and practices, both oral and written, that I have previously received. I understand that, except for the employment at-will policy, Online Access, Inc. can change any and all policies or practices at any time.

In consideration of my employment, I agree to abide by the policies and procedures of Online Access, Inc. and agree that my employment and compensation can be terminated, with or without cause, and with or without notice, at any time at the option of either Online Access, Inc. or me. I understand that no manager or representative of Online Access, Inc. other than the Owner/President has any authority to enter into any agreement for employment for any specified period of time, or to make any agreement contrary to the foregoing and that such changes must be in writing.

My signature below certifies that I understand that the foregoing agreement on employment at-will status is the sole and entire agreement between Online Access, Inc. and me concerning the duration of my employment and the circumstances under which my employment may be terminated. This Agreement supersedes all prior agreements, understandings and representations concerning my employment.

DATED: _____

Employee Signature

Print Name
