MFR Policy & Procedure Handbook

For Employees



128 Chestnut Street ● Atrium at Olde City ● Philadelphia, PA 19106 ● Tel: (215) 238-9270 ● Fax: (215) 238-9733

Revised: September 2016

Table of Contents

MFR Employee Promise..... 4
SECTION 1: EMPLOYMENT 5
Equal Employment Opportunity 6
Onboarding 8
Termination of Employment 11
SECTION 2: TIME & COMPENSATION 15
Project Hour and Timesheet Policy 16
Payroll, Overtime, Deductions 20
SECTION 3: CONDUCT POLICIES 21
Standards of Conduct 22
Discrimination and Unlawful Harassment 25
Whistleblower Protection Act 28
Computer, Email and Internet Use 31
Use of Personal Electronics in the Workplace 35
Dress Code 36
SECTION 4: SAFETY 38
Safety Protocols (On and Off-Site) 39
Violence in the Workplace 41
Emergency Evacuation and Fire Emergency 43
Drug and Substance Abuse 45
Incident Reporting 48
Smoking Policy 49
Inclement Weather 50
SECTION 5: BENEFITS 52
Benefit Procedures 53
Employee Training Reimbursement 55

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Workers Compensation 56
Military Leave 57
Jury Duty 60
Bereavement Leave 61
Paid Time-Off (PTO) 62
Consolidated Omnibus Budget Reconciliation Act of 1985 (COBRA) 65
SECTION 6: OPERATIONS 67
Operations Policies and Procedures Development 68
Network Security 70
Information Technology Security Breach Notification 71
Proper Software Use 74
Elevator Keys 76
Recycling Policy 77
Shred Policy 78
Purchasing 79
Software Purchases 81
Mail Receipt 82
Supply Delivery Receipt 83
Facility Management 85
Invoice Processing 87
Business Travel and Expense 88
POLICY & PROCEDURE ACKOWLEDGMENT 89

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

MFR Employee Promise

At MFR Consultants, Inc., our staff is the most important resource in our commitment to providing innovative, strategic solutions to our clients.

By nurturing talent to the benefit of each individual and the company, MFR equips its team with the values and motivation to support the goals of the company.

MFR is committed to providing a respectful and dynamic work environment that encourages professional growth, rewards innovative thinking, and creates value for our clients.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

SECTION 1: EMPLOYMENT

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Equal Employment Opportunity**

Policy: **Both federal and state laws prohibit employment discrimination in any manner.** It is the policy of MFR Consultants, Inc. that all employees be afforded equal opportunity in all employment practices. This includes but is not limited to:

- Appointment
- Promotion
- Training
- Discipline
- Demotion
- Separation
- Transfer
- Pay
- Working Conditions
- Assignment
- Classification
- Gender

These practices are to be followed without regard to race, color, religion, sexual orientation or preference, age, national origin, or disability.

If any employee has a complaint of discriminatory treatment in the course of their employment at MFR Consultants, Inc., he/she may appeal to the Director of Human Resources to conduct a thorough, impartial, and independent inquiry.

Purpose: To define the EEOC guidelines so as to comply with state and federal statutes.

Scope: This applies to all MFR staff, senior management, and MFR representatives. MFR reserves the right to request that its clients and customers also comply.

Procedures:

1.0 If any employee of MFR believes they have been the object of a discriminatory action from any other MFR staff, management, consultant, or client, they are to file a complaint in writing and E-mail it to the Director of Human Resources immediately, with a copy to Human Resources and the Chief Operating Officer (COO).

2.0 The Director of Human Resources will appoint a person or persons from within the organization, or an outside independent source to investigate the matter.

3.0 A report and disposition of the action by Human Resources will be completed within sixty (60) business days.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

4.0 The complainant and/or the accused may appeal any decisions made to the COO.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Onboarding**

Policy: It is the role of Human Resources and the management staff to assist new staff members with understanding their role and helping them learn more about MFR Consultants, Inc. The new staff member will be given all of the company practices and compliance documentation, become acclimated to other staff members and clients, the company culture, their job, and the varied types of work performed and services provided by the company.

Purpose:

- Help employees to quickly become acculturated and impactful to the business
- Help employees utilize corporate resources and business-specific methodologies and approaches
- Provide a consistent experience for new employees
- Make sure employees feel welcome and valued

Scope: All new permanent part-time and full-time employees to MFR.

Procedures:

1.0 Pre-employment: Human Resources and Operations Departments will work in conjunction to prepare and complete the following items prior to the start of the new employees hire date. The items/activities consist of, but are not limited, to the following**:**

- 1.1 Send out offer letter of employment including the following employment documents:
  - 1.1.1 MFR Employment Application
  - 1.1.2 Confidentiality Agreement
  - 1.1.3 Direct deposit form
  - 1.1.4 Information to complete I-9 form
  - 1.1.5 Emergency contact form
  - 1.1.6 W-4 form and local state tax forms
  - 1.1.7 Computer & Internet Usage Policy form
- 1.2 Conduct background and reference check
- 1.3 Assign/prepare/clean work area
- 1.4 Provide supplies (stapler, pens, post its, etc.)
- 1.5 Complete the “MFR Individual Employee Infrastructure and Security Tracking Sheet” and “Equipment Release Form” which will include:
  - 1.1.1 Set up of office phone and voice mail and email
  - 1.1.2 Assign/order computer/tablet, if applicable

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

1.1.3 Assign/order cell phone, if applicable
1.1.1 Obtain appropriate key codes for office access for new employee
1.1.2 Enter employee information into MFR's HRO system and assign number
1.1 Announce employee's upcoming arrival to staff and key customers
1.2 Order business cards, if applicable
1.3 Order company credit card/gas card, if applicable
1.4 Complete the Employee Information Sheet/Payroll Change Notice

2.0 Employee Start Date: HR and Operations will conduct an introduction to the Company. Prior to the start date, the employee shall submit the following documents to the Director of Human Resources:
2.1 Complete the "New Hire Checklist Form" and obtain the following:
1.1.1 I-9 form (copies of two forms of identification attached)
1.1.2 Signed offer letter and confidentiality agreement
1.1.3 Completed direct deposit form
1.1.4 Tax forms
2.2 Orientation will consist of the following:
2.2.1 Overview of MFR
1.1.1.1 What We Do
1.1.1.2 Key Industry Groups
1.1.1.3 Mission, Vision, Culture
1.1.1.4 Company Strategy
1.1.1.5 Organization Structure
1.1.1.6 Employee Handbook and Policy & Procedure guide
1.1.1.7 MFR group health plan information and enrollment forms
2.3 Introduction to staff members, management, clients, and office areas
2.4 Set-up of desk location, order of any other supplies, E-mail and Voicemail, etc.

Onboarding Process

1. Employee Onboarding: the assigned Manager is responsible for acclimating the new staff member to his/her work environment which may include providing information, training, mentoring, and coaching throughout the transition. The assigned Manager is also responsible for making introductions to the team, clients,

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

work practices, projects, contacts, and all things tangible for the new hire's employment.

2. Human Resources will work with management staff to prepare an onboarding program for the new hire to address the following initiatives:

   - Facilitate the new employee's ability to contribute in the new role
   - Increase the new employee's comfort level in the new role
   - Reinforce a positive work environment to reduce employee turnover
   - Enhance productivity
   - Encourage commitment and employee engagement
   - Foster a commitment to the company's goals and values

3. The performance of new or transferred staff will continually be evaluated during the introductory period while the staff member is being on-boarded **(90 day Introductory Period).** The Manager should discuss, in an informal manner, any performance-related problems with the staff member. If, at any point during the introductory period, there are serious problems or concerns in regards to the employee's performance, the Manager must bring these concerns to the attention of Human Resources to discuss the best course of action and next steps.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Termination of Employment**

Policy: Termination of employment may occur as a result of any of the following, including but not limited to:

- Resignation
- Death while employed
- Retirement
- Lay-off
- Absent for more than 3 days without permission
- End of a term appointment
- Completion of a specific work assignment or termination of external funding
- Termination of introductory appointment
- Dismissal

Purpose: To ensure proper guidelines around termination are consistent and adhered to by all MFR staff.

Scope: All permanent and part-time MFR employees

Procedures:

Resignation

All employees covered by this policy are required to give at least two (2) weeks written notice of their intention to leave the employ of MFR. Written notice in the form of a business letter is to be given to the immediate Manager with a copy forwarded to Human Resources and the COO.

Death of an employee

Upon being notified of an employee's death, the Director of Human Resources will contact the surviving family, if applicable. They will make arrangements with the family representative to ensure that applicable benefits and documentation are properly processed.

Retirement

Any employee can choose to leave his/her employment permanently for such reasons that include, but are not limited to: eligibility to collect retirement resources such as social security, distribution from a 401(k) plan or other retirement plan; ill health or debilitating

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

physical problems; family issues or responsibilities that may require retirement. Whatever the reason(s), the employee will need to submit a written notice in the form of a business letter two (2) weeks before their intended date to their immediate Manager with a copy forwarded to Human Resources and/or the COO.

Lay-off

There are times when MFR will need to lay-off employees for reasons such as, but not limited to: lack of internal/external work, contract termination (see notice of term appointment) or business restructuring. Employees who are subject to a lay-off will be given notice by Human Resources and may be eligible to receive unemployment benefits and continued group health benefits, if applicable. MFR will comply with all applicable state laws.

Notice of Term Appointment

These employees have been hired for a specified position and/or time period. The date of termination is usually a condition of their hire and contract.

Termination within Introductory Appointment

The employment of an employee within their introductory period may be terminated during this period as designated by their immediate Manager. Human Resources will prepare a termination letter and discuss the issue with the employee before and/or by the end of their introductory period expiration.

Dismissal

Dismissal is the result from one or more combined violation of MFR corporate policies and procedures. Reasons for dismissal are not limited to the following:

- Consistent dishonesty affecting performance and/or client relations
- Insubordination
- Violent conduct involving either actual physical contact or the threat of physical contact
- Drug, alcohol use, sell or possession of, while on MFR or client property
- Job performance (more than 2 reprimands)

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

- Purposeful damage to MFR property
- Culminating incidents
- Missing/unexcused prolonged absences
- Conduct considered inconsistent with MFR policy, procedure, and organizational effectiveness
- MFR reserves the right to terminate the employment relationship at any time, with or without cause or advance notice.

Return of company property

All employees who leave the employ of MFR either voluntarily or involuntarily must return MFR property before their scheduled last day of work, and to satisfy all financial obligations, if applicable.

Examples of MFR property include, but are not limited to:

- Identification cards, pass codes, door and building codes
- Any keys to the office and contents within
- Confidential documents or material which includes E-mail, files, and records
- Any literature, software, or hardware that belongs to the company
- Credit cards
- Computer/server access codes and passwords

Upon termination, the COO will make the appropriate arrangements to have the employee's computer logon code, password, E-mail account, and pass code number discontinued.

Final Paycheck

Voluntarily terminated employees will receive the final paycheck by direct deposit on the normal pay cycle, if direct deposit was selected prior by the employee. If not, the paycheck will be mailed. MFR does not offer severance pay and under no circumstances, regardless of pay status or position, will severance be paid. For involuntarily terminated employee's, final paychecks will be mailed on the next normal pay cycle.

Exit Interview

All employees who terminate their employment voluntarily are encouraged to schedule an exit interview with the Director of Human Resources. The purpose will be for a formal discussion to gain insight about the employee's experience working for MFR and to

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

receive feedback about the company's culture, leadership, employee benefits, and other organizational factors.

The goal of this meeting will be to gather data that will help assess organizationally what should be improved, changed or remain intact that will strengthen MFR's retention efforts and competitive advantage. Once the employee submits a letter of intent of resignation, Human Resources will contact the employee and schedule an exit interview meeting, preferably in a confidential, private or off-site location. This will allow the employee to feel comfortable discussing and giving feedback about his/her experience with the company.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

SECTION 2:

TIME & COMPENSATION

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Project Hour and Timesheet Policy**

1. Responsibilities
    - Employee
    - Project Manager
    - Payroll Administrator
    - Human Resources
2. Department
3. Timesheet Policies
4. Accessing Travel & Expenses (T&E)
5. Completing MFR Timesheets

Policy: MFR employees will utilize an online system to:

- Enter hours worked and task descriptions for each pay period
- Enter Project Hours for each pay period
- Enter leave taken for each pay period
- Employees will use MFR's HRO System to:
    - Review and edit personal information
    - Review status of personal paid-leave

Employees must enter work hours, project hours and leave used, if applicable, on the timesheet and MFR Project Managers, Program Managers and Managers will be responsible for verification of the hours, leave used and submission via the online system.

Purpose: To ensure all MFR employees have the process and procedures to enter their time appropriately and that the information is disseminated in a consistent manner.

Scope: All MFR employees

Procedures:

1. Responsibilities

Employee:

- Log in, on a daily basis, to enter work hours and/or leave hours on the timesheet
- Update timesheets with descriptions about tasks performed during that day
- Complete the timesheet and hit "SAVE"

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Employees are responsible for reviewing their timesheet entries often during the bi-monthly pay period, and make sure that they have recorded the total number of hours required each week. Employees must also review their project hours during the bi-monthly pay period, and make sure that they have recorded their assigned tasks and hours associated with the project.

If an employee has not touched the timesheet nor recorded any hours, the employee will not receive a paycheck since it is the employee's overall responsibility to complete their own timesheet.

- If the Manager does not approve timesheet hours, the employee will not be paid. The employee must then meet with the Project Manager to resolve the matter or escalate it to the COO.
- To update Employee Personal Information, employees will use MFR's online HRO System to enter and update information (address, telephone number, email contact information, etc.)
- To submit Leave Requests, employees will use MFR's online HRO System. Employees must obtain prior approval by the Manager, Project Manager or COO and/or Chief Executive Officer (CEO) prior to taking leave.
- Employees who experience technical problems with MFR's online systems or have questions regarding their basic use must contact their MFR Manager.

Project Manager:

- Ensure that employees are included in their appropriate group for timesheet and project hour approvals
- Authorize time worked for all employees supervised. Review employee timesheets and project sheets weekly
- Approve all requests for leaves of absence via MFR's online HRO System
- Work closely with the employee as questions or problems arise to resolve timely
- Add new employee information into MFR's T&E system

Payroll Administrator:

- Ensure that all timesheets are approved by the Manager before each pay period. Only those timesheets approved by MFR Managers will be allowed to be included into the bi-monthly payroll. If the Payroll Administrator finds that an employee's

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

timesheet is not approved, they must transfer it to an MFR Manager for final approval before submission with the payroll.

Human Resources:

- Serve as a guide to new employees until they become familiar with the timesheet and to answer questions regarding leave usage and work hours.
- Ensure that employees provide documentation for specific types of leave when required, and that employees adhere to MFR policies regarding leave usage.

2. Department

Each employee is assigned to an MFR Department. The Department ties the employee to an MFR Manager. Each MFR Manager will be able to view all of the timesheets and project hours within the Department and is responsible for approving the time and hours of the employees who directly report to them.

An MFR employee's status determines the types of leave they are entitled to.

Type	Description	Leave Entitlement
RFT	Regular Full-time	Paid leave (annual, sick, personal, holiday), comp. time with approval
INT	Interns	No Paid-Leave (annual, sick, personal, holiday), no comp. time.
RPT	Regular part-time	No Paid-Leave (annual, sick, personal, holiday), no comp. time.
TFT	Temporary	No Paid-Leave (annual, sick, personal, holiday), no comp. time.

3. Time Sheet Policies

Each MFR employee will be provided with a username and password to log on to the online system to record time. Employees must have access to a computer with a web browser.

Every MFR employee must submit a timesheet for approval at the end of each week, no later than the following Monday at 12

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

noon. Timesheets are prepared via MFR's online time recording system.

- There are two pay cycles per month. The first pay cycle begins on the first day of the month and ends on the 15th day of the month. The second pay cycle begins on the 16th day of the month and ends on the last day of the month.
- There are 24 pay periods each calendar year.

4. Completing MFR Timesheets

- Part-time and temporary employees must record time in/time out, and a lunch break.
- Regular full-time employees need only record a start time and an end time. They do not need to report lunch breaks. A normal work day is 8 hours, 9:00AM – 5:00PM.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Payroll, Overtime, Deductions**

Policy: MFR employees are paid bimonthly, the 15th and the last day of each month. If the payday should fall on a weekend, he/she will be paid on the Friday immediately prior to that payday. If the payday occurs during an MFR recognized holiday, then he/she will be paid on the workday immediately prior to that payday.

MFR does not pay overtime to exempt employees. Non-exempt employees will be paid only for the hours actually worked. This includes part-time staff and temporary staff. If a non-exempt employee requires more than 40 hours completing a task or project, they must submit a request for overtime to their Project Manager and/or COO for approval. If the request is approved, then there will be compensation for those overtime hours worked. If the request is denied or no request submitted, and the employee works anyway, they will not be paid overtime wage for those hours worked.

Purpose: To define and clarify MFR's payroll, overtime and pay deductions policies.

Scope: All MFR employees

Procedures:

1.0 Full and part-time employees will have the following deductions made directly from their paychecks:

- City Wage Tax
- State Tax
- Federal Tax
- Social Security
- Unemployment Compensation
- Worker's Compensation

2.0 Other deductions regarding insurance benefits will also be made. MFR will make partial insurance premiums payments as decided by the CEO. The employee will be responsible for out-of-pocket payment to cover the balance. This will include Health Insurance, Dental Insurance and Vision Insurance.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

SECTION 3:

CONDUCT POLICIES

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Standards of Conduct**

Policy: There are reasonable rules of conduct which must be followed in any organization to help a group of people work together effectively. Each MFR employee is expected to present him or herself in a professional appearance and manner.

If an employee is not considerate of others and does not observe reasonable rules of conduct, disciplinary action will be taken.

Generally, commission of a violation of a work rule that is not serious enough to warrant discharge will be subject to disciplinary action in a progressive manner. An initial violation deemed by MFR not serious enough to warrant discharge may warrant a counseling session and/or a written reprimand. A repeated offense will usually indicate an inability or conscious refusal to comply with our rules and policies and this will normally result in more serious discipline, up to and including discharge.

Listed below are offenses, which we consider serious enough to warrant disciplinary action, up to and including discharge, for a single offense. Of course, this is not intended to be an all-inclusive list. Rather, the list simply illustrates some of the more common examples of employee offenses.

Accordingly, MFR retains its right to act as circumstances warrant.

1. Excessive absenteeism or tardiness
2. Dishonesty, including falsification of personnel or other MFR documents, and misrepresentation of any fact to or on behalf of MFR
3. Fighting, disorderly conduct or any other behavior which is dangerous or disruptive
4. Illegal manufacture, distribution, dispensation, sale, possession or use of illegal drugs or controlled substances
5. Reporting for work with illegal drugs or un-prescribed controlled substances in your body
6. Commission of a crime or other conduct, which may cause damage to the reputation of MFR
7. Stealing, misappropriating or intentionally damaging property belonging to anyone other than yourself
8. Unauthorized use of MFR's funds, equipment, vehicles or property

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

9. Insubordination, including failure or refusal to comply with any work assignments or instructions given by any MFR Manager with the authority to do so, or using obscene, abusive or threatening language to fellow employees or Managers
10. Harassment or intimidation of an employee, specifically including harassment or intimidation because of that employee's sex, race, color, age, religion, national origin, ancestry, handicap, sexual orientation, disability or marital status
11. Failure to immediately report to your Manager or designee as designated in MFR's policy prohibiting harassment, the harassment or intimidation of an employee, specifically including harassment or intimidation because of that employee's sex, race, color, age, religion, national origin, ancestry, handicap, sexual orientation, disability, or marital status
12. Any violation of our ethical business conduct policy
13. Failure to cooperate with an internal investigation, including, but not limited to, investigations of violations of these Standards of Conduct
14. Failure to comply with published personnel policies and procedures of MFR
15. Performance which, in MFR's expectations, does not meet the requirements of the position
16. Failure to complete and submit timekeeping procedures on a regular basis
17. Other such reasons which may affect the efficient operation of MFR

In addition, there are a series of employee offenses that may result in disciplinary action, up to and including termination. These include, but are not limited to the following:

- Sleeping on the job
- Violation of safety rules and/or policies
- Falsification of employment records or documents
- Unauthorized removal of any MFR property, documents or records
- Divulging confidential or proprietary information relating to MFR
- Divulging confidential information regarding a workplace investigation
- Dishonesty or fraud
- Insubordination
- Multiple and/or excessive violations or other misconduct

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

- Violating local, state, or federal laws

Procedures:

Depending on the severity of the disciplinary problem, an oral warning, a written reprimand, disciplinary plan or discharge may be necessary. While MFR generally supports a progressive discipline policy, MFR reserves the right to deviate from such a policy when circumstances warrant. MFR's policy of resorting to progressive discipline is not intended as a limitation on MFR's at-will employment policy and in all cases MFR reserves its right to enforce its rules of conduct and to discipline employees in accordance with what it deems is in the best interest of MFR.

Human Resources will assess, investigate, and determine appropriate course of action based upon the issue/situation(s). HR will advise management and provide appropriate documentation to management and the employee based upon the disciplinary action recommended.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Discrimination and Unlawful Harassment**

Policy: MFR is committed to a work environment in which all individuals are treated with respect. **MFR expressly prohibits discrimination and all forms of employee harassment based on race, color, religion, sex, national origin, age, disability, military or veteran status, or status in any group protected by state or local law**.

Sexual harassment is a form of discrimination and is prohibited by law. For purposes of this policy sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when this conduct explicitly or implicitly affects an individual's employment, unreasonably interferes with an individual's work performance, or creates an intimidating, hostile, or offensive work environment. Unwelcome sexual advances (either verbal or physical), requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when: (1) submission to such conduct is made either explicitly or implicitly a term or condition of employment; (2) submission or rejection of the conduct is used as a basis for making employment decisions; or, (3) the conduct has the purpose or effect of interfering with work performance or creating an intimidating, hostile, or offensive work environment.

Sexual harassment may include a range of behaviors and may involve individuals of the same or different gender. These behaviors include, but are not limited to:

- Unwanted sexual advances or requests for sexual favors
- Sexual or derogatory jokes, comments, or innuendo
- Unwelcomed physical interaction
- Insulting or obscene comments or gestures
- Offensive E-mail, Voicemail, or text messages
- Suggestive or sexually explicit posters, calendars, photographs, graffiti, or cartoons
- Making or threatening reprisals after a negative response to sexual advances
- Visual conduct that includes leering, making sexual gestures, or displaying of sexually suggestive objects or pictures, cartoons or posters
- Verbal sexual advances or propositions
- Physical conduct that includes touching, assaulting, or impeding or blocking movements
- Any other visual, verbal, or physical conduct or behavior deemed inappropriate by MFR

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Harassment on the basis of any other protected characteristic is also strictly prohibited.

Retaliation Prohibited:

MFR expressly prohibits retaliation against any individual who reports discrimination or harassment, or assists in investigating such charges. Any form of retaliation is considered a direct violation of this policy and, like discrimination or harassment itself, will be subject to disciplinary action, up to and including termination of employment.

Purpose: To gain a comprehensive understanding of the legal ramifications surrounding all forms of discrimination and harassment, and define the company's "no tolerance" process for such behavior.

Scope: This policy affects all MFR staff, temporary employees, independent contractors, management, and clients.

Procedures:

1.0 If an employee believes he/she has been the victim of discrimination and harassment, they are strongly urged to file an informal complaint, verbal or written, to Human Resources with a copy to the COO.
   1.1 The claimant must file his or her own report.

2.0 When a report is made, HR will meet with the complainant to take a detailed report of the claimant's statements.
   2.1 As soon as HR has the report, they will notify the COO who will serve as witness throughout the investigative process.
   2.2 HR and the COO will arrange a meeting with the accused detailing the complaint.
   2.3 The identity of the accuser will remain confidential and no information will be given to the accuser's Manager or other employees.
   2.4 The investigative process which will entail ascertaining information from all parties involved and documentation from both sides, should take no more than seven (7) workdays from the date of the initial filing of the complaint.

3.0 If both opposing parties agree, HR and the COO will mediate a meeting between them.
   3.1 The goal is to foster a dialogue and hopefully come to a comfortable resolution to the situation from both sides.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

3.2 Both parties are free to end the informal proceedings at any time.

4.0 If both parties demand a more formal process, then HR will refer the investigation to an external mediator or other appropriate agencies.

5.0 If the allegations are found to be true, then the harasser will be immediately disciplined up to and including termination from MFR.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Whistleblower Protection Act**

Policy: It is the express policy of MFR Consultants, Inc. to encourage the disclosure of evidence of gross mismanagement, gross waste of Federal funds, an abuse of authority relating to a Federal contract, or a violation of a law, rule, or regulation related to a Federal contract. MFR Consultants, Inc. will not discharge, demote, or otherwise discriminate against an employee as a reprisal for disclosing any of the information in the context of the following:

a. Discloses, or threatens to disclose, to a manager or to a public body an activity, policy or practice of the employer or another public employer, with whom there is a business relationship, that the employee reasonably believes is in violation of a law, or a rule or regulation issued under the law.
b. Provides information to, or testifies before, any public body conducting an investigation, hearing or inquiry into any violation of law, or a rule or regulation issued under the law by the employer or another public employer, with whom there is a business relationship.
c. Provides information involving deception of, or misrepresentation to, any shareholder, investor, client, patient, customer, employee, former employee, retiree or pensioner of the employer or any government entity.
d. Provides information regarding any perceived criminal or fraudulent activity, policy or practice of deception or misrepresentation which the employee reasonably believes may defraud any shareholder, investor, client, customer, employee, former employee, retiree or any governmental entity.
e. Objects to, or refuses to participate in, any activity, policy or practice which the employee reasonably believes:
    i. is in violation of a law, or a rule or regulation issued under the law;
    ii. is fraudulent or criminal; or
    iii. is incompatible with a clear mandate of public policy concerning the public health, safety or welfare or protection of the environment.

Purpose: To apprise and inform MFR employees of their whistleblower rights and protections under the Whistleblower Protection Act.

Scope: This policy applies to all MFR employees working on public (city, state, federal) contracts.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Procedures:

1.0 Filing Complaints. An employee who believes that he or she has been discharged, demoted, or otherwise discriminated against contrary to this policy must submit a complaint in writing to their Manager, Human Resources, or to the Chief Operating Officer providing information about the activity, policy or practice in violation.

2.0 Upon receipt of the written complaint, HR and/or COO will have within 30 days to acknowledge receipt and make reasonable effort to correct the activity, policy or practice.

3.0 If the complaint involves a government agency or municipality, or persons employed within a government agency or municipality, MFR will report the complaint to the Contracting Officer, head of the affected governmental agency or municipality, for them to provide a written response of their receipt of complaint to MFR within 30 days.

- 3.1 Once received, the Contracting Officer, head of the affected governmental agency or municipality, will need to provide a written response of their findings within 120 days.
- 3.2 MFR will determine if findings provide existence of an adverse reaction to our employee and will seek to remedy the situation with the employee immediately.
- 3.3 In addition, MFR or the employee may seek additional legal counsel and remedies against the government agency or municipality, as determined.

4.0 Remedies.

- 4.1 Not later than 120 days after receiving a written complaint, HR and/or COO will:
  - 4.1.1 Undertake an investigation
  - 4.1.2 Determine whether sufficient evidence exists to conclude that MFR engaged in a retaliatory action
  - 4.1.3 Provide a report of findings, which may include:
    - 4.1.3.1 Statements of witnesses
    - 4.1.3.2 Documents or other forms of information relating to complaint
    - 4.1.3.3 Any responses back from alleged accuser (employee) or witnesses, during investigation
  - 4.1.4 If report concludes that MFR engaged in retaliatory action, then remedies may include but not be limited to the following:
    - 4.1.4.1 Meet with employee to discuss findings
    - 4.1.4.2 Reinstate the employee to the position held before the reprisal, together with compensatory damages (including back pay),

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

and any employment benefits that would apply had the reprisal not taken place

4.1.4.3 Pay the employee an amount equal to the aggregate amount of all costs and expenses (including attorney fees, if acquired) that were incurred in connection with bringing forth the complaint

4.1.4.4 Provide on-site ethical and code of conduct training for all management and staff

4.1.4.5 Agree to seek mediation services, if employee and MFR do not agree on an amicable remedy

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Computer, Email and Internet Usage**

Policy: Computers, emails, internet, telephones, and other electronic equipment at MFR are intended for business use. We recognize that situations may arise in which employees need to use these resources for personal reasons such as a family emergency. Personal use of company equipment should be kept at a minimum and not abused, and used only in urgent circumstances.

This policy involves the use of various kinds of electronic communications within the workplace. They include:

- Internet
- E-mail
- Fax machine
- Telephone
- Voicemail

MFR management rarely engages in monitoring employee or consultant electronic activity. However, no employee or anyone else representing MFR has the expectation of privacy concerning his or her electronic communications in the workplace. All communications done during company time utilizing company equipment and resources is by law, state and federal, considered to be the property of the company. The MFR maintains the right to monitor, intercept, record, or review employee electronic, oral, and wire communications at any time. Employees should not send or receive any electronic communication utilizing company equipment and resources if they wish for it to remain private.

The exception is the case of certain telephone calls. If an employer is monitoring employee calls, they can continue to monitor it if the call is business related. However, if it is found that the call is personal, the monitoring must be discontinued immediately. This does not apply if the employee has been warned about the use of certain company telephone equipment to make, and receive, personal telephone calls. The employee then takes the risk of having personal information monitored.

The primary reasons for monitoring include quality assurance, maintaining the company's reputation and image, keeping abreast with employee productivity and workplace efficiency, and discourage any illegal activities.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Any password protection provided to an employee with respect to their E-mail, Internet use, and Voicemail does not provide a special right of privacy. Password protection is given only to prevent other employees and third parties from accessing another employee's identity. They do not prevent the company from accessing messages for business purposes.

An employee's password is to be readily provided to the COO, who will keep the information confidential. Once established, under no circumstances may the password be changed.

Any violation of this policy will incur a disciplinary action, up to and including termination.

Internet and E-Mail

These devices have been provided to assist employees in doing business and staying in touch with clients and other staff. They are to enhance company effectiveness and productivity.

The use of the Internet and E-mail is for business purposes. It is realized that at times employees may utilize them for personal reasons. This is permissible provided the use is to stay in touch with family members, and the use is during the employee's breaks or lunch period, and does not include any prohibited activity.

Prohibited conduct using the Internet and E-mail include, but is not limited to, the following. The MFR staff **will not**:

- Download or transmit obscene material.
- Transmit derogatory, discriminatory, defamatory or any other inappropriate messages including any sexually-explicit material, ethnic or racial slurs, or anything that could be interpreted as disparaging of others based on race, national origin, gender, sexual orientation, age, disability, religious or political beliefs.
- Download or transmit any information that can be viewed as sexual harassment or discrimination in any form.
- Transmit or download copyrighted images, games, or text without the copyright holder's permission.
- Transmit company or client information to third parties without the express permission of the company upper management or client.
- Transmit company secrets to a third party.
- Download or open any file received from any other source outside of the company without first checking for viruses.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

- Engage in any activity that can be seen as harassing, insulting, attacking, or stalking others.
- Use another employee's password unless approved by that employee.
- Trespass or hack into another employee's folders, work, or files
- Intentionally damage company computers, computer systems, and computer networks.
- Use company resources and network for outside business or commercial purposes.
- Illegally copy, or pirate, software applications.
- Use company resources and network to engage in any improper behavior such as gambling, and download games or other large file sites that are not business related.

Violation of any or all of the above items will result in immediate disciplinary action up to and including termination of employment. Any employee found liable will be prosecuted to the fullest extent of the law by MFR and the associated legal/government agencies.

The company can be held liable for the conduct of one of its employees or representatives in violating the above issues resulting in extensive lawsuits and penalties.

Every employee should also realize that every company network system has the ability to reconstruct deleted E-mail. Once the deleted information has been stored in the backup system the employee has no right to privacy concerning any information contained in the deleted E-mail. This deleted information can also be subpoenaed, and reconstructed, for legal reasons whether against the individual employee and/or the company.

Telephone Calls

An employer is allowed by federal law to monitor employees' telephone calls to clients, customers, and other employees during the usual course of business for quality control. If the conversation is being recorded, the law allows for the nondisclosure of the monitoring although it is a courtesy usually extended to clients. The same is true for business telephone calls with out of state customers or clients.

Any business related call could be monitored. However, under federal law, once the employer realizes the call is personal, he or

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

she must immediately stop monitoring the call. The exception is employees who are told not to make personal calls from specified office phones. The employee then takes the risk of having their personal calls monitored.

Voicemail/Fax Machine

The same rules of conduct and policy for Internet and E-mail communications apply to the business Voicemail and fax machine. These devices are for business related communications.

Purpose: To ensure that standards of conduct are being adhered to, throughout electronic communications.

Scope: This policy applies to all MFR employees.

MFR staff has the responsibility for using the company electronic communications with adherence to this policy, and to use it for work related purposes only other than incidental personal use as allowed by company management.

Procedures:

1.0 All computer systems within the MFR Office (PA) are connected to the Internet by a local access line.
2.0 When a new employee arrives, the IT Administrator will set up their information on the Company's network server.
    2.1 This includes access to the company server and E-mail.
3.0 If an employee receives an electronic communication that violates the Company's policy.
    3.1 Do not erase the offending or illegal message.
    3.2 Contact the COO and CEO immediately.
        3.2.1 They will note the time, day, content of information, and name of sender and address the situation as warranted.
        3.2.2 Any other action by the employee will be seen as a violation of the policy and subject to disciplinary action.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Use of Private Electronic Devices in the Workplace**

Policy: Electronic devices include but not are limited to the following:

- Radio
- Portable CD player
- M3P player
- Any accessory multimedia device on the desktop computer
- Cell telephone

Personal electronic devices may be used in the workplace on a limited basis. Volume must be kept at a low level so as not to become a distraction to surrounding staff and/or visitors. If the COO feels your devices are intrusive, you will be asked to lower the volume. A second such encounter will result in the loss of the use of personal electronic devices.

Many staff, senior management and consultants now carry cellular telephones. Use of these devices must be kept to a reasonable minimum and not intrude on the space of others in nearby surroundings.

Laptop Computers

Personal laptop computers are not to be integrated into the business local access network line for Internet access. This disrupts the network server and allows the introduction of harmful computer viruses. All are encouraged to leave their personal laptop computers at home. The firm has a laptop computer that can be used for presentations.

Purpose: To outline acceptable use of personal electronic devices within the work environment.

Scope: This policy includes all MFR staff, consultants, temporary staff, and senior management.

Procedures: None

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Dress Code**

Policy: MFR Consultants, Inc. has a relaxed and informal dress code. All MFR employees and representatives are expected to dress appropriately on a daily basis. Their appearance is to be neat and clean with good hygiene habits. Clothes are to be pressed, fresh, and in good condition.

During the summer shorts, sandals, and short-sleeved shirts are permitted as long as they are clean and appropriate business casual. The wearing of tennis shoes, or sneakers, is discouraged. Business casual for our office usually includes slacks, denim clothes, knit shirts, and tightly woven cloth shirts or blouses. Again, these items are expected to be clean and crisp without evident need of repair.

All employees must be covered from shoulders to knees at all times (no see-through or sleeveless clothing is permitted at any time).
The same goes for torso body piercing jewelry or jewelry that can be seen through or under clothing must not be worn during business hours. Also, facial jewelry, such as eyebrow rings, nose rings, lip rings and tongue studs, is not professionally appropriate and must not be worn during business hours.

All employees and other MFR representatives are expected to dress in acceptable corporate business attire for all client meetings, presentations, or any gathering where the MFR corporate image is on display. Corporate attire is considered to be a suit with an ironed white cotton shirt and tie for men. Besides suits, women also have the choice of wearing a conservative dress of modest length.

MFR retains the right to define, within reason, what it believes is appropriate dress. Unacceptable dress for the office includes, but is not limited to:

- Sloppy, torn, dirty and/or unkempt clothing
- Bared midriff, revealing neckline, tube tops, tank tops, and bared shoulders
- Shorts that end more than three (3) inches above the knee
- Shorts that are considered “cut-offs” and are frayed at the hem, unless for an MFR outside event
- Jeans, except when granted permission
- Very tight fitting clothing

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Anyone violating this policy will receive a verbal reprimand at the first occurrence. A second offense will result in a written reprimand, which is to be placed in the employee's personnel file. A continued disregard for the policy may result in further disciplinary action up to and including termination.

Purpose: To offer guidelines for proper attire, casual and corporate, in the workplace.

Scope: This policy encompasses all MFR employees.

Procedures:

1.1 If anyone has a question regarding acceptable office attire, they are encouraged to contact Human Resources.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

SECTION 4: SAFETY

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Safety Protocols (On or Off-Site)**

Policy: To ensure that all employees and contractors conduct all tasks in a safe and efficient manner complying with all local, state and federal safety and health regulations and company standards, with any special safety concerns for use in a particular area, or with a client, or working on the clients work site.

Purpose: The federal government, through the Occupational Safety and Health Act (OSHA), regulates all workplaces to ensure that certain safety standards are met. It is the responsibility of all personnel to create and maintain a safe work environment and follow safety procedures.

Scope: This policy is intended for all MFR employees, contractors and/or independent contractors working on or off-site MFR premises.

Procedures:

1.0 Everyone, including employees and contractors, is responsible for their own personal safety and the safety of their co-workers, in every job, at every level of the organization, whether on MFR premises or on the clients work site(s).

2.0 Management will provide a safety overview in the orientation and onboarding of all new hires.

3.0 For employees and/or contractors working on Client work sites, the following will commence:

- 3.1 The project manager will obtain a point of contact (POC) for the employee and/or contractor who will provide on-site information on how to react in an emergency, where exits are located and other areas involving potential evacuation, acts of violence, hazardous conditions, or any other emergency issues that may arise at the clients work site.
- 3.2 All employees and contractors should greatly familiarize themselves with the client's safety procedures in the event of an emergency.

4.0 Reporting - All employees and contractors should be encouraged to report any unsafe conditions, acts of violence, suspicious behavior or items, or the like, right away, to the following employees and/or contractors working on Client work sites, the following will commence:

- 4.1 On MFR premises, the COO or Human Resources;

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

4.2 On Client premises, the Project Manager, POC or designee;

4.3 In the event of an emergency, the following should commence:

4.3.1 **BE SAFE** - follow all procedures as instructed;

4.3.2 Bring cell phones with you in the event of evacuation or relocation;

4.3.3 Once you are in a safe location or situation, contact your MFR Project Manager and/or Human Resources immediately;

4.3.4 If the employee and/or contractor is unable to contact their MFR Project Manager or Human Resources, the POC at the client's location will contact the MFR Project Manager and provide any pertinent information applicable to the emergency;

4.3.5 MFR Project Manager, Human Resources, COO or CEO will contact the employee's and/or contractor's emergency contacts, alert them of the situation and any other pertinent information as it relates to the emergency;

4.3.6 MFR will make every attempt to contact those listed on the emergency contact sheet or any next of kin designated by the employee and/or contractor;

4.3.7 For independent contractors, their own business location or management personnel will be contacted;

4.3.8 MFR Management and Human Resources will follow up in terms of next steps for the handling of emergency assessment, employee work place assignment, project notifications, benefit notifications or other employment and personnel related matters.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Violence in the Workplace**

Policy: MFR seeks to provide a work environment that minimizes workplace violence or other security risks. Violence in the workplace poses a threat to the safety of employees and the public and affects productivity. All employees are responsible for minimizing workplace violence. This policy establishes procedures that minimize the threat of violence in the workplace, without restricting appropriate public access to MFR employees and client locations, and provides guidelines for responding promptly and effectively to workplace violence.

Definition: Workplace Violence is any intentional act that inflicts, attempts to inflict, or threatens to inflict bodily hurt on another person or that inflicts, attempts to inflict, or threatens to inflict, damage to property, whether committed by an MFR employee or by anyone else and which occurs in MFR's workplace, or at a client's site location or while an employee is engaged in MFR business.

Employee offenses that may result in disciplinary action, up to and including termination, include, but not limited to, the following acts:

- Theft
- Fighting
- Disorderly conduct
- Threatening or abusive language and/or conduct toward others
- Damaging or destroying MFR property
- Possession of firearms or weapons on MFR property
- Possession, distributing and/or selling alcohol or drugs on MFR property
- Reporting to work under the influence of alcohol or drugs
- Endangering the safety and/or health of yourself or others through horseplay or other unsafe acts
- Harassment or discrimination against another employee
- Retaliating against another employee for making a complaint of or for providing information during a workplace investigation

Purpose: To ensure a safe and productive work environment free of violence and other security risks.

Scope: All MFR employees

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Procedure:

1.0 All employees shall report any incident of prohibited workplace conduct or violence to their immediate Manager or contact Human Resources.

2.0 HR will contact the COO and CEO to notify them of the situation or issue and attempt to resolve the situation without escalation.

3.0 If the situation or issue is an emergency, HR, the COO and/or CEO will contact the police for further advisement and resolution of the situation.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Emergency Evacuation and Fire Emergency**

Policy: In the event of a fire emergency, call 911 immediately. Although there are two (2) fire extinguishers within our office premises, if there is a fire on site it is best to call the Philadelphia Fire Department via 911 and leave the site immediately.

In the event of an evacuation, staff is to leave the office site in an orderly fashion. There are two (2) exits, which are marked by large and brightly lit exit signs. One exit is behind the elevator, and the other is in the kitchen area. Upon leaving, walk upstairs and go directly to the first floor then exit the building. Do not use the elevator in the event of a fire.

The exit near the kitchen allows one to go either left or right. Staff is instructed to go to the right then up the stairs and exit the building. There is an exit to the outside by going left, however, the metal door may be difficult to open, and one does not want to use up precious time in an emergency evacuation trying to open a difficult door. If by chance during the evacuation one does go left and the door proves easy to open, they will exit directly to the outside into the building courtyard. There are gates there that can be opened from inside the area.

It is strongly suggested, however, that all take the easiest route of egress and take the stairs to the first floor, then out of the building.

The designated meeting site for MFR staff post evacuation is across the street at the corner of 2nd Street and Chestnut Street. This allows for the accounting of all who were evacuated from the office.

This exit route is the same for any situation, which calls for an emergency evacuation.

Employees at Client Locations:

If you work on a client site, become familiar with the exit and evacuation procedures of their office. If you are unsure, speak with your Client Manager and obtain information on exit locations, fire extinguishers, and routes to safety for that specific building or office location.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Purpose: To educate and prepare employees on how to stay safe and handle an emergency situation and how to evacuate the building or client location in the event of an emergency.

Scope: This policy and procedure involves all MFR staff, consultants, clients, and representatives working on the MFR business site.

Procedures:

1.0 In the case of Fire:
- 1.1 Call 911 immediately, and pull the fire alarm.
- 1.2 Inform the office occupants of the situation.
- 1.3 Evacuate the premises immediately via the routes described in the above policy or the routes at the client's office location.
- 1.4 Meet at the designated emergency site so as the presence of all occupants can be accounted for.

2.0 Other emergencies
- 2.1 If an event occurs that requires the emergency evacuation of the office, follow the procedure for that listed in the Fire section.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Drug and Substance Abuse**

Policy: MFR is committed to maintaining a workplace free of drugs and substance abuse. No employee is allowed to consume, possess, sell, purchase, manufacture, dispense or be under the influence of alcohol or illegal drugs on any property owned by or leased on behalf of MFR, as abuse of alcohol and/or illegal drugs, is destructive to the interests of our employees, our clients and our company. It is also our policy to strictly prohibit the drinking of alcoholic beverages during working hours or reporting to work while under the influence of alcohol. This could have tragic consequences where demanding or stressful work situations call for quick and sound decisions to be made. All employees should report evidence of alcohol or drug abuse to their Manager or Human Resources immediately.

In cases in which the use of alcohol or drugs creates an imminent threat to the safety of persons or property, employees are required by MFR to report the violation. Failure to do so may result in disciplinary action, up to and including termination of employment.

Employees who are on prescription medication/drugs or have recently been prescribed medication/drugs should notify Human Resources immediately so that they can make a clear determination of the safety risks associated with the employee's work duties and ability to work. If Human Resources are unable to determine whether the prescription medication/drugs may cause significant safety risks for the employee and others, Human Resources will send the employee home and request a physician's note approving the employee's ability to return to work without restrictions.

If the employee does not provide Human Resources with a physician's note approving the employee "fit for duty", the employee will not be allowed to work and may be subject to disciplinary action, up to and including termination of employment.

Accordingly, the following activities are prohibited on company premises, while on MFR business, or at MFR sponsored activities:

1. The unlawful manufacture, use, possession, sale or transfer of narcotics or other legally controlled drugs or substances and alcohol.

2. The use of prescription drugs or over-the-counter drugs or substances (including alcohol) when such use, sale or other

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

transfer results in an alteration of any employee's personality, responsiveness, judgment, ability to perform all aspects of that employee's job satisfactorily, results in a disruption of other employee's efforts to perform their job, or is detrimental to the employee or MFR.

3. The use of alcohol without prior approval of management, as well as, the use of alcohol which leads to impaired performance, inappropriate behavior, and endangerment of the safety of others or a violation of applicable policies.

Activities do not include social events, client functions or other business functions. Nonetheless, employees participating in these activities are expected to maintain social responsibility at all times when consuming alcohol. Employees who violate this policy will be subject to disciplinary action, up to and including termination.

As a part of our effort to maintain a workplace free of drugs and substance abuse, Employees may be subject to testing based on observations by a Manager of apparent workplace use, possession or impairment. Human Resources must be consulted before sending an employee for reasonable suspicion testing. Within the limits of federal, state, and local laws, MFR reserves the right to examine and test for drugs and alcohol at our discretion. As a condition of your employment with MFR, employees must comply with this Policy. Be advised that no part of the Drug and Substance Abuse Policy shall be construed to alter or amend the at-will employment relationship between MFR and its employees.

Employees found in violation of this policy may be subject to disciplinary action, up to and including termination of employment.

Purpose: To outline the practice and process designed to identify and correct instances of drug and/or substance abuse within the workplace.

Scope: This policy applies to all MFR staff.

Procedures:

1.0 If a Manager witnesses or suspects that an employee's judgment or work performance is impaired by a prohibited drug or substance or the employee is in possession of a prohibited drug or substance, the Manager must contact Human Resources immediately.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

1.1 HR will arrange a meeting with the employee to discuss the situation. Based upon the discussion, HR may schedule the employee for a drug/alcohol test.

1.2 Employee refusal to cooperate in required tests will result in discipline up to and including termination.

1.3 Employees who comply with testing will be paid for time spent in drug/alcohol testing and then suspended pending the results of the drug/alcohol test.

1.4 After the results of the test are received, a date/time will be scheduled to discuss the results of the test.

1.4.1 The meeting will include a member of management and Human Resources.

1.4.2 Should the results prove to be negative, the employee will receive back pay for the times/days of suspension.

1.4.3 If the results are positive, the employee will be subject to disciplinary action up to and including termination.

1.4.4 If disciplinary action results in termination, HR will refer the employee to treatment providers. Depending on the situation, which is determined on a case-by-case basis, HR may allow the employee to re-apply for open positions at the company after a year from their termination date, given no other company policy was violated at the time of termination.

2.0 Human Resources will refer employees who voluntarily seek help for a drug and/or substance use problem to treatment providers. The employee may be placed on a leave of absence and allowed to use accrued paid time off; otherwise granted accommodation as required by law.

3.0 Information and records relating to positive test results, drug and alcohol dependencies and legitimate medical explanations provided to HR shall be kept confidential to the extent required by law and maintained in secure files separate from normal personnel files. Confidentiality in these matters is assured.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Incident Reporting**

Policy: There will be times when accidents and events occur during the workday. Unfortunately, the majority of these will be due to human error. No matter the cause, events that occur in the office that are not the usual routine should be reported immediately. The complainant will then be asked to complete and submit an **Employee Incident Report Form**

Incidents, which should be reported, include, but are not limited to the following:

- Falls/slips
- Any acute injury incurred while working
- Breech of the facility
- Faulty or dangerous equipment
- Nonworking or broken equipment

Purpose: To keep abreast of firm and employee vulnerabilities in the day-to-day operation of the office.

Scope: This policy applies to all MFR employees

Procedures:

1.0 If a person feels they have witnessed or been involved in a reportable incident, they must immediately contact the COO.
2.0 The complainant will be asked to complete and submit an Employee Incident Report Form.
3.0 The COO will launch an investigation into the problem/incident.
  3.1 The completion of the investigation with a full report will take place no longer than two (2) weeks after the incident.
4.0 Confidentiality will be observed at all times.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Smoking Policy**

Policy: MFR Consultants, Inc. is a smoke free worksite. The building in which the business resides, The Atrium at Olde City Building, 128 Chestnut Street, Philadelphia, PA 19106, is also a smoke free site.

Any employee or consultant associated with MFR is free to engage in tobacco use. However, he or she is not allowed to do so within the offices of the building, or anywhere else inside the building. The smoking site for this building is outside of the building, 20 feet away from the main street entrance.

Every employee at MFR is allowed a 30-minute lunch break and two (2) fifteen minute breaks during the workday. Anyone wishing to use their breaks for smoking should do so outside or around the company building.

MFR does not engage in a policy of discrimination against any employee who smokes, nor will it refuse to hire applicants because they are smokers.

Purpose: To define acceptable behavior in maintaining a smoke free workplace, delineate expectations for those wishing to take smoking breaks, and designate the approved smoking area.

Scope: This policy encompasses all MFR staff, consultants, senior management, and anyone else representing the MFR Company. This document will also apply to MFR clients.

Procedures:

1.0 The staff will follow the policy of signing in and out in the Staff Locator Log at the front desk each time they leave for a break.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Inclement Weather**

Policy: During times of inclement weather, all employees of MFR are expected to show for work unless otherwise informed by their Manager/Project Manager, Human Resources, the COO or CEO. MFR does not recognize days missed because of inclement weather (i.e., snow, rain, flood, etc.) If you have any doubts, call your Manager/Project Manager or Human Resources directly to advise them of your situation.

In the event that the office or the client's office has to remain open, opens late, or closes early because of the weather, non-exempt employees will be paid only for actual hours worked.

Exempt employees may choose to use their available PTO in the event that the office is open, but are unable to get to work or feel the conditions are too much of a deterrent, etc. If time is taken, the employee must use the same amount of PTO that was taken, for example: leave the job three (3) hours early, then the employee must use three (3) hours of PTO.

There are cases when the client's office may give MFR employees a choice of staying home or coming to work under extreme conditions. MFR can only suggest that employees use common sense and exercise caution. MFR will not be responsible for any personal injuries or property damage incurred in the employee's attempt to get to work during severe weather.

Purpose: To give employees guidelines during severe weather and understand how to exercise caution at all times.

Scope: All MFR staff, temporary employees, and independent contractors.

Procedures:

5.0 The decision to open or close the office during inclement climate is at the discretion of the CEO.
- 5.1 For employees working on client sites, the decision to open or close their office is at the discretion of their management.

6.0 Once the decision is made then the COO or Human Resources will contact personnel to relay pertinent information.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

7.0 If at any time, an employ of MFR has a question regarding office operations during severe weather, they can contact the COO or Human Resources directly.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

SECTION 5: BENEFITS

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Benefit Procedures**

Policy: On the employee's first week of work, they will be given benefit summaries detailing coverage and deduction amount information to review regarding MFR's group health plans. The employee will be given the option of enrolling in the Medical, Vision, and Dental plans.

Purpose: To define the benefits offered to full-time employees and to detail enrollment procedures.

Scope: All Full-time employees are eligible for the following series of benefits offered by MFR:

- Medical Benefits
- Dental Benefits
- Vision Benefits

Procedures:

1.0 All benefit information and enrollment forms must be given to new employees within 5 days from the date of hire.

2.0 The employee will have 15 days from the date received to return the completed forms to HR for processing.

3.0 HR will follow-up with employees in 5 days to ensure receipt of all forms from new employees.

4.0 The employee's coverage will begin on their 61st day of employment with MFR.

5.0 Employees electing not to participate in MFR's group health plan should indicate that on the forms, as MFR will need to maintain documentation for our records for regulatory reasons.

6.0 Once the employee decides to enroll, or not, in MFR's group health plan, the employee cannot make any changes to their elections until MFR's renewal period. For employees this time is called "Open Enrollment".

6.1 During open enrollment employees can elect to enroll in coverage, change their current coverage elections, or elect not to enroll in coverage.

6.2 The changes to enrollment will take effect at the beginning of the renewal period for a period of one year until the next open enrollment period.

6.3 At any time, if an employee experiences a qualified life event he/she should contact Human Resources to discuss; as this is the only time the employee will be able to change their enrollment and/or coverage status.

6.4 In accordance with health care laws, a "qualifying life event" includes but is not limited to:

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

- Birth, adoption, placement for adoption, and death of a dependent
- Marriage/separation/annulment/divorce
- Loss of job resulting in loss and/or change in health coverage
- A dependent ceasing to satisfy eligibility requirements for coverage due to attainment of age, student status, marital status, or other similar circumstances
- Court judgments, decrees, or orders

6.5 In addition, employees should contact Human Resources if they have a change in address so HR can appropriately update the information to the insurance carriers.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Employee Training Reimbursement**

Policy: MFR will reimburse up to 50% of approved work-related training for full-time employees.

Purpose: To define the employee training reimbursement policies.

Scope: This document applies to all MFR employees.

Procedures:

1.0 MFR will reimburse up to 50% of approved and work-related training for full-time employees who have completed one (1) year of employment.

- 1.1 The employee must complete the Training Request Form and submit it to the COO. Once the course gets full approval by required signees, the employee can begin the course.
- 1.2 Once the course is completed, the employee must provide a receipt showing payment for the course along with confirmation that he/she has passed the course with a 2.0 grade point average or above in order to receive the reimbursement.
  - 1.2.1 Reimbursement will be provided by check within 30 days.
- 1.3 The employee must complete a full year of employment with MFR starting from the last day of the course.
  - 1.3.1 If the employee fails the course or leaves MFR prior to completing a full year after having taken the course, they must reimburse MFR for its portion of the training costs.
    - 1.3.1.1 If not paid in advance or if the employee is terminated, the amount will be deducted from the employee's final paycheck.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Worker's Compensation**

Policy: If an employee sustains an injury on the job site or in the process of conducting company business off premises they may be eligible for Worker's Compensation.

Purpose: To refer employees to the proper channels to initiate a Worker's Compensation (WC) claim if eligible.

Scope: This policy only applies to those individuals who are full or part-time staff or management who have Worker's Compensation deductions made from their paychecks.

Procedures:

1.0 If there is an incident that may involve Worker's Compensation, the affected party is to complete and submit an Employee Incident Report Form to the COO as soon as reasonably possible.

2.0 It is the responsibility to the affected individual to contact the company's insurance carrier.

2.1 This office will process the information and instruct the employee through the process.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Military Leave**

Policy: It is the express policy of MFR Consultants, Inc. to ensure that upon returning from service, members of the armed services and its reserve components be reinstated to their civilian jobs without loss of benefits, pension, and seniority. This includes all military personnel, including those who engage in weekend drills, summer encampment, or similar types of training.

Purpose: To define military leave and its requirements as it affects employees.

Scope: This policy applies to any MFR staff and all levels of management who may be called for military duty. It does not apply to temporary staff or independent consultants.

Procedures:

1.0 Employees who perform duty, voluntarily or involuntarily, in the uniformed services are protected under the Uniformed Services Employment and Reemployment Rights Act (USERRA) of 1994. This requires that upon returning from service, members of the armed services and its reserve components be reinstated to their civilian jobs without loss of benefits, pension and seniority. This law protects all military personnel, including those who engage in weekend drills, summer encampment, or similar types of training.

1.1 The uniformed services are defined as Army, Navy, Marine Corps, Air Force, Coast Guard, and Public Health Service commissioned corps, all of their reserve components as well as the National Guard and Air National Guard.

1.2 Service may include active duty, active duty for training, initial active duty for training, inactive duty training, full-time National Guard duty, and absence from work for an examination to determine a person's fitness for any type of duty.

2.0 As soon as an individual is notified of their having been called to active duty or any other component covered by this policy, they are to immediately inform the COO.

2.1 They should give the following information:

2.1.1 Name, contact information, if any, expected day of departure, expected day of return.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

3.0 MFR has the right to advance notice of service, unless conditions warrant it impossible for the employee to do so (i.e., a national emergency).
- 3.1 This notice may be written or oral. We would prefer a written statement for our records.
- 3.2 Although it is not mandatory, we would also like you to furnish us with an estimation of the time period in which you plan to be absent.

4.0 An employee's restoration rights are based on duration of military service rather than the type of military service performed.
- 4.1 If you serve ninety (90) days or less, you will be reemployed in position that would have been attained if continuously employed.
- 4.2 Upon return there is no loss of seniority, status, and pay as military service is considered a leave of absence.

5.0 The time limit for return after serving is as follows:
- 5.1 **Less than 30 days of service.** You must return by the beginning of the first regularly scheduled work period after the end of the last calendar day of duty, plus time required to return home safely. If this is impossible or unreasonable, then as soon as possible.
- 5.2 **31 days to 180 days.** Application for reemployment must be submitted no later than 14 days after completion of service. If this is impossible or unreasonable through no fault of your own, then as soon as possible.
- 5.3 **181 days or more.** Application for reemployment must be submitted no later than 90 days after completion of a person's military service.

6.0 While on military leave, MFR will not pay wages for time missed.
- 6.1 You are not required to use your vacation or personal leave during this time period.
- 6.2 You can, however, request that a combination of leave to be used if you wish to receive wages in your absence.
- 6.3 Otherwise, this is an unpaid leave.

7.0 As for health insurance, if an employee is on military service for less than 31 days, they can pay their usual premium amount as if still employed by MFR.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

7.1 If, however, an employee is gone for greater than 31 days, the employee may be required to pay 102% of the premium to maintain their health insurance.

8.0 There are exceptions to USERRA regulations. MFR is not required to reemploy any individual under the following circumstances:

8.1 The employer's circumstances have changed such that reemployment is impossible or unreasonable.

8.2 The employment position that the person left was considered brief, and non-concurrent, and there is no reasonable expectation that this employment would have continued for a significant time period.

8.3 A reasonable notice of the desire to return to work is not given.

8.4 The employee's separation from military service was dishonorable, based on bad conduct, or "other than honorable."

8.5 The employee now has a service-connected disability that would impose an undue hardship on the employer.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Jury Duty**

Policy: MFR recognizes that Jury Duty is a civic responsibility of its employees and will provide paid leave up to a period of 5 days in a calendar year.

Purpose: To facilitate the understanding of the MFR staff and senior management regarding Jury Duty.

Scope: This encompasses all MFR employees, consultants, and interns.

Procedures:

1.0 The employee is to inform the COO of impending jury duty as soon as the notice is received.

2.0 The employee will complete and submit a “Request for Leave” form along with a copy of the jury summons to the COO as soon as the notice is received.

3.0 The employee will return to work if during jury duty they are released early at least four (4) hours before the end of the regular workday.

3.1 The employee must also return to work on those days they are not needed for jury duty.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Bereavement Leave**

Policy: In the event of a death in an employee's immediate family, he/she will be granted four (4) full days of leave. The list of immediate family members includes:

- Spouse
- Domestic Partner
- Children
- Parent(s)
- Stepchildren
- Stepparent(s)
- Sibling(s)
- In-law(s)
- Grandparent(s)
- Grandchild

It is at the discretion of the CEO to name as an immediate family member anyone residing in the employee's household who is related by blood or affinity, and whose close association is the equivalent to that of a family relationship.

This is **paid** leave for full-time, exempt employees. This is leave **without pay** for part-time, non-exempt, and contractual employees.

Purpose: To define the period of funeral leave and its compensation.

Scope: This document applies to all MFR staff (full-time, part-time, temporary, non-exempt and contractual) and senior management.

Procedures:

1.0 The employee will notify their Manager, COO or Human Resources, as soon as possible after receiving news of a family member's demise.

2.0 The employee will fill out a "Request for Leave" form letting the firm know the day(s), and time if applicable, involved.

2.1 This form is to be given to the employee's Manager

2.2 Accompanying this should be the funeral arrangement information (funeral home, date of funeral, time of services, name of deceased)

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Paid Time-Off (PTO) Policy**

Purpose: To delineate the number of paid days available to full-time employees after they have completed their probationary period, and to inform them that there is no longer an accrual of time for various types of leave.

Scope: All full-time MFR employees and senior staff.

Policy: MFR provides its regular, full-time employees with a comprehensive paid time-off plan that combines vacation, sick, and personal days into one category called "paid time off". These days can be used for illnesses, vacation and personal days (doctor's appointments, personal events, etc.). Paid time-off benefits are computed on the basis of continuous and uninterrupted active service beginning with the employee's hire date.

Paid time off will now be accrued on a monthly basis as per MFR's fiscal calendar year, which is January 1st thru December 31st. Employees will no longer accrue days based on their anniversary date.

The PTO calculations per year will be as follows:

Total Days Earned per year	Days Accrued per month
15	1.25

Therefore, each employee will be eligible for a maximum of 15 PTO days in a calendar year.

Paid time off accrual for new hires that are regular, full-time employees begins immediately after their hire date and will be made accessible after the successful completion of the probationary period, which is the first ninety (90) days of employment. Employees who join MFR during the calendar year will have their PTO accrual pro-rated based upon their hire date. Once the calendar year has ended, paid time off accrual for employees starts again at the beginning of each fiscal calendar year (January 1st).

Payment of paid time off will be made at the employee's regular rate of pay at the time the employee uses his/her paid time off and shall not include any premium or differential payment. During an employee's term of employment, he/she will not receive a check in

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

lieu of taking time off. Therefore, PTO must be used to receive credit for it.

If the employee terminates his/her employment with MFR (voluntarily or involuntarily, lay-offs) he/she will only be paid for the amount of PTO that he/she has accrued but has not used as of the date of his/her termination. The employee will not be paid for any unearned paid time off if they terminate with MFR.

On the occasion where an employee takes time off before the time has been accrued during the year, the time off granted will be considered a "credit" to the employee's PTO. **This credit represents a PTO advance of paid time** which will continue to be earned during the year. **Therefore, at termination (voluntarily or involuntarily, lay-offs) a repayment to MFR will exist if the employee has used paid time off credits before they have been earned**.

Any earned but unused paid time off, up to a maximum of 3 days, may be carried forward to the next calendar year, provided it is used within the first 60 days of the calendar year. For example, if at the end of the 2016 calendar year, an employee has 2 days to carry forward, the days must be used by February 28, 2017.

If an employee has exhausted their PTO before the end of the calendar year, with the approval of the Manager, COO and/or CEO, he/she may take time off without pay.

If an employee is on paid leave during an official paid holiday, this time will not be charged to the employee's paid leave allowance and will be recorded as a paid holiday.

With the exception of paid leave taken due to illness or injury, MFR employees must request the time they wish to be out of the office at least thirty (30) days in advance to ensure that their absence will not interfere with the work of their department.

Exclusions: MFR part-time or temporary employees are not eligible to receive paid leave. Any time off granted by MFR to part-time or temporary employees will be non-paid.

Procedures:

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

1.0 For all planned PTO, employees must notify their Manager at least thirty (30) days prior to the proposed onset of their leave. For any unplanned PTO employees must notify their Manager at least 24 hours before the onset of their PTO.

2.0 Employees must enter their PTO request into the Paychex HRO System for approval. This will be the official record for all PTO requests. MFR will not honor any requests that are not entered into Paychex.

3.0 The employee must enter in ALL PTO requests into the HRO System in order to be paid. This includes PTO for illnesses or any other reason.

4.0 Employees must take unpaid leave if they exhaust their PTO bank of days before the end of the MFR fiscal calendar year

4.1 Employees who have exhausted their PTO must enter their request into the HRO System as UPTO (Unpaid Time Off)

5.0 **Employees must also indicate any PTO or UPTO on their QuickBooks Timesheet for the day.**

5.1 **If an employee is entering in a UPTO day, then he/she must zero "0" out his/her hours for that day on his/her timesheet.**

6.0 Approval or denial, of a request is contingent upon the amount of PTO available to the employee, as well as the needs of the company (MFR), client, and that of the employee.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Consolidated Omnibus Budget Reconciliation Act of 1985 (COBRA)**

Policy: The Consolidated Omnibus Budget Reconciliation Act (COBRA) entitles employees to continue their group health coverage once employment with MFR has been terminated. If you are entitled to COBRA benefits, Human Resources must send you a notice stating your right to choose to continue benefits provided by the plan. You have 60 days from receipt of the notice to accept coverage or lose all rights to benefits. Once COBRA coverage is chosen, you are required to pay for coverage.

COBRA contains provisions giving certain former employees, retirees, spouses and dependent children the right to temporary continuation of health coverage at group rates. This coverage, however, is only available in specific instances.

Qualifying Events

"Qualifying events" are certain types of events that would cause, except for COBRA continuation coverage, an individual to lose health coverage. The type of qualifying event will determine who the qualified beneficiaries are and the required amount of time that a plan must offer the health coverage to them under COBRA. A plan, at its discretion, may provide longer periods of continuation coverage.

The types of qualifying events for employees are:

- Voluntary or involuntary termination of employment for reasons other than "gross misconduct"
- Reduction in the number of hours of employment

The types of qualifying events for spouses are:

- Termination of the covered employee's employment for any reason other than "gross misconduct"
- Reduction in the hours worked by the covered employee
- Covered employee's becoming entitled to Medicare
- Divorce or legal separation of the covered employee
- Death of the covered employee

The types of qualifying events for dependent children are the same as for the spouse with one addition:

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

- Loss of "dependent child" status under the plan rules

Purpose: To provide guidance and process as it relates to the continuance of health benefits after employment with MFR terminates (voluntarily or involuntarily).

Scope: All full-time employees eligible and/or enrolled in the MFR health benefit plans.

Procedures:

1.0 Once an employee is terminated (voluntary or involuntary), HR has 30 days to mail a notice of continuation of group health benefits and election form.

2.0 The former employee has up to 60 days to respond and elect COBRA.

3.0 They must abide by the guidelines indicated in the notice and send all payments for premiums at the designated dates.

4.0 The former employee and/or beneficiary can choose to discontinue COBRA coverage after election, at any time during their coverage period.

5.0 Finance is responsible for receiving and processing the COBRA payments. If Finance does not receive the premium payments on the date indicated in their election letter, Finance will notify HR who will then send a “reminder” letter indicating that payment is due.

6.0 If Finance still hasn’t received payment after 10 days from the date the reminder letter was sent, MFR can terminate the former employee’s and/or beneficiary’s coverage for non-payment.

7.0 HR will send a follow-up notice to the former employee and/or beneficiary indicating termination of COBRA coverage.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

SECTION 6: OPERATIONS

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Operations Policies and Procedures Development**

Policy: The COO will develop policies and procedures to govern MFR's office operations. All policies and procedures will reside on the Z-Drive and a hard copy will be available on the side bookshelf.

Policies and procedures, while offering guidelines for office conduct and operations, are dynamic documents and therefore, subject to change. The CEO, COO, and Human Resources will review them no less than every six (6) months and no more than yearly. At the time of review, assessments will be made as to the effectiveness of the policy and procedure, and decisions will be made as to whether additional changes are required.

Purpose: To keep the office policies and procedures effective, efficient, and important to the day-to-day workings of the MFR firm.

Scope: Company policies and procedures encompass all MFR staff (full and part-time), contractors, and any representative hired to uphold MFR's corporate image.

Procedures:

1.0 The COO will develop policies and procedures, as they are needed to continue the smooth operations of the office.
   1.1 The request for new guidelines will usually come directly from the office of the CEO.
2.0 Once the initial drafts are completed, they will be submitted to the CEO for review of content and legality.
   2.1 This should be completed within fourteen (14) working days.
3.0 When the reviews are completed, the drafts will be returned to the COO who will make a final draft as per the CEO's comments.
4.0 The COO will disseminate the policy to staff and each staff member will be required to sign and acknowledge receipt of the policy within 3 business days.
5.0 The new policy will subsequently be placed in the **MFR Consultants, Inc. Policies and Procedure Handbook**.
   5.1 This handbook will be housed in the bookshelf on the wall behind the front desk.
   5.2 It is the responsibility of the each person who will be affected by the policies and procedures to review them and sign off.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

5.3 **All are expected to comply with the policies and procedures. Ignorance of the content of these documents, and an individual's ability to comply, will not be an acceptable excuse should disciplinary measures be required.**

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Network Security**

Policy: It is the express policy of MFR Consultants Inc. to restrict access to the corporate server.

At no time is any employee, Manager, contractor, approved MFR representative, or client to interfere willingly or maliciously with proper system performance. If this occurs, the individual will incur severe disciplinary action up to and including termination from employment.

Purpose: To set the guidelines of who has full access to the server, and discourage unauthorized use and tampering.

Scope: This policy and its associated network policies affect all MFR staff, management, and authorized representatives such as consultants.

Procedures:

1.0 If a problem is noted at an individual's workstation they must report it to the COO as soon as reasonably possible.
2.0 The COO will relay the report to the IT Administrator for instructions on how to proceed.
3.0 If the IT Administrator instructs a staff member to back up their individual system, then he/she should do so without hesitation.
    1.1 Usually this signifies IT will be working with the server or on that particular system in that workspace.
    1.1.1 The chance of losing data is always a threat in such situations.
4.0 In the event of the network system crashing or being violated (i.e., viruses), the COO or Senior Project Manager will contact IT immediately for repair.
    4.1 They will ascertain the expected time of IT arrival and the approximate length of downtime.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Information Technology Security Breach Notification**

Policy: The contained policy and procedure are designed to explain the protocol for notification of an information technology security breach. It also addresses the responsibilities of various senior executives involved in the procedure. A clear protocol is necessary to ensure the appropriate notification to employees and clients in the advent of a security breach.

Purpose: This Breach Notification policy is intended to establish a framework within MFR for addressing a data breach while ensuring that proper safeguards are in place to protect sensitive information such as Personally Identifiable Information (PII).

The PII is "information which can be used to distinguish or trace an individual's identity, such as their name, Social Security Number, biometric records, *etc*., alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother's maiden name, *etc*."

This policy also addresses incident response regarding PII, risk categorization, safeguarding against breaches of PII, and consequences.

Scope: Applies to all employees and contractors, and to all sensitive data, maintained and controlled by MFR, including external organizations on behalf of MFR. This policy applies to information and information systems in any format (*e.g.*, paper, electronic, *etc*.) and does not distinguish between suspected and confirmed breaches.

Procedures:

In response to a number of public and private company information technology security breaches, MFR finds it both prudent and responsible to establish appropriate policies to safeguard and protocols to respond to the a breach of personally identifiable information within its possession. MFR developed this Breach Notification Policy to outline protective measures that must be followed if there is a breach of PII in possession of MFR. A "breach," based on Federal guidelines, includes the potential or actual loss of control, compromise, unauthorized disclosure, unauthorized acquisition, unauthorized access, or any similar term referring to situations where persons other than authorized users and for other

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

than authorized purposes have access or potential access to personally identifiable information, whether physical or electronic.

MFR has implemented technical controls to ensure the security and confidentiality of its information and information systems and to protect against threats to their security and integrity. The process includes determining security categorization based upon level of risk (low, moderate, or high) consistent with various Federal and industry best practices, applying the appropriate set of security controls, and implementing the appropriate level of security safeguards.

1.0 Roles and Responsibilities. MFR's Executive Management Team (EMT) will be convened upon the identification of a potential breach of personal information, except as noted below. This core group will initially evaluate the situation to direct the breach notification response.

2.0 External Breach Notification. The EMT will use the procedures contained in this policy for making a breach notification determination and response. All MFR users must follow these procedures in the event of an information or information system breach.

MFR's Office of Chief Counsel must be notified and consulted in the event of a breach of PII and before any breach notification occurs to determine if the notification is authorized.

3.0 Risk Assessment. Whether breach notification is required must be based upon the likely harm caused by the breach and by assessing the level of risk. Likely harm should be determined by considering five (5) factors:

1. The nature of the data elements breached;
2. The number of individuals affected;
3. The likelihood the PII will be or has been compromised – made accessible to and usable by unauthorized persons;
4. The likelihood the breach may lead to harm; and,
5. The ability of the agency to mitigate the risk of harm.

If a loss of personal information poses a high risk of identity theft, exposure, and harm, as determined by EMT, notification will be made to the affected individuals, contingent upon Chief Counsel's review and authorization.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

4.0 Privacy and Security Awareness Training. MFR requires that managers, supervisors and employees be informed and trained regarding their respective responsibilities relative to safeguarding personally identifiable information and the consequences and accountability for violation of these responsibilities. MFR must educate its employees and other authorized entities with access to PII (*e.g.*, through a data sharing agreement) regarding the rules to safeguard information and information systems, the breach notification process in the event of a breach, and the potential consequences of the breach. All MFR employees and contractors will receive annual Security Awareness Training and Privacy Awareness Training.

5.0 Cognizant Authority. The MFR security team is responsible for the maintenance of this policy. This policy must be reviewed each year and updated as needed.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Proper Software Use**

Policy: It is the policy of MFR Consultants, Inc. to respect and comply with all computer software copyrights, and to adhere to the terms of the software licenses we have purchased for the firm. All company employees and/or MFR representatives may not:

1. Use software on multiple machines or local area networks unless authorized by the software company's license agreement.
2. Give software used by the company to any third party.
3. Duplicate any licensed software for any other reason than for production of a backup disc as allowed by most software licenses.
4. Use or install on any MFR computer system or company network server any software that has not been approved in writing by the IT/Network Manager. Any personal software approved for use by the IT/Network Manager shall be registered with the COO and be recorded as personally owned.

Approval of any software use may be withheld by the IT/Network Manager for any reason. This includes but is not limited to:

- Harmful to company computer equipment
- Improper license(s)
- Suspected virus

Employees are not to download software applications or trial applications without the written permission of the IT/Network Manager.

Any unauthorized duplication of software is not allowed. Doing so may subject employees and/or MFR Consultants, Inc. to both civil and federal criminal penalties under the United States Copyright Act. Copyright laws protect software from unauthorized copying and distribution, even in the absence of a license agreement. The majority of commercial software will have a copy of the license and regulations within the packaging.

Any violation of this policy will result in harsh penalties, including termination, on a case-by-case basis.

Purpose: To prevent copyright infringement and protect the integrity of the MFR network and computers from viruses.

Scope: This policy applies to all MFR staff, consultants, temporary staff, and senior management.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Procedures:

1.0 When new software is approved by the CEO, and is purchased, it will be given to the IT Administrator who will record the attached information and place the software in the Software Library.

1.1 The ITAdministrator will be responsible for the following:

1.1.1 Complete and return the accompanying registration card to the software company.

1.1.1.1 The software will be registered in the name of the company.

1.1.2 Place a copy of the software and its manual in the Software Library

1.1.3 Record the serial number of the software and place it on the document holder housing the software and manual.

1.1.4 Record and file the site of each download of the software as well as the serial number of the system to which the software was installed.

1.1.5 Place backup copies of each disc with other related items in its corresponding document holder.

2.0 After registration, the ITAdministrator will install the software, or if approved, by the person(s) who will be utilizing the software.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Elevator Keys**

Policy: It is the express policy of MFR Consultants, Inc. to ensure that its premises remain secure at all times. Therefore, the elevator key is restricted to senior executives of the firm and the Operations Associate.

Purpose: To ensure restricted access to the office area during off-peak hours.

Scope: This policy applies to senior level executives and the Operations Associate.

Procedures:

1.0 Each senior level executive, specifically the COO, the Managing Directors for Corporate Development, Finance/Accounting, and Project Management will be provided with an elevator key. In addition, the Operations Associate and certain designated administrative staff may also have access, as needed, to an elevator key. Each executive shall verify receipt of the elevator key on the Equipment Release Form.

2.0 Under no circumstances is the elevator key to be duplicated, replicated, or shared.

Should the elevator key be lost and/or stolen, the Executive or Operations Associate will incur a replacement fee of $100.00, payable to MFR Consultants, Inc.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Recycling Policy**

Policy: Under the Philadelphia Commercial Recycling Law, recycling is a legal requirement in the city of Philadelphia. Employees must make a continuous effort in recycling the following materials: mixed paper, cardboard, glass, metals, plastics, and carton.

Purpose: Recycling is good for the environment, helps create jobs, contributes to funding for city programs, fuels the economy, and is a legal requirement.

Scope: This policy applies to all MFR employees, consultants, and senior management.

Procedures:

1.0 All office cans and glass bottles must be disposed of in the blue recycling bin located in the kitchen area. Mixed paper, cardboard and plastic containers must be disposed of in the recycling bag located near the exit.
2.0 This rule applies to all internal MFR recyclables such as newspapers, magazines, mail, phone books, food boxes, computer paper, office paper, glass (beverages jars and bottles), metals (tin, aluminum and steel cans), plastics (soda, milk, water, etc), cartons (food and beverage).
3.0 Items that have been shred must also be emptied into a separate recycling bag also by the exit.
4.0 Regular trash items and discarded food must be deposited into the gray trash can located by the exit. All food must be cleaned out of recyclable items prior to disposal.
5.0 Cardboard items must be emptied and flattened before being put in recycling bin.
6.0 Used ink cartridges should be given to the COO for recycling.
7.0 Please contact the COO with any questions or requests.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Shred Policy**

Policy: All office documents and paper, and other sensitive media with company and client information (including prospects) must be secured and shredded according to Company policy.

Purpose: To ensure sensitive material and media is disposed of properly.

Scope: This policy applies to all MFR employees, consultants and senior management.

Procedures:

1.0 All office documents, paper, and other sensitive media with company and client information (including prospects) must be secured and shredded according to Company policy.

2.0 This includes internal MFR information such as proposals, presentations, qualifications, handwritten notes, materials with the MFR logo, pictures, as well as social security numbers, transaction numbers, account information, customer contact information, printed emails, and more. All sensitive and items perceived as sensitive material must be secured for shredding.

3.0 Paper must be separated from items that are considered critical. Items that *should not* be shredded or placed into the shred box includes, but is not limited to: newspapers, magazines, boxes, cardboard, plastics (covers, for example), 3-ring binders (remove paper for shredding), wrapping, etc.

4.0 Items appropriate for shredding include: all office paper, file folders, and colored paper

5.0 Prior to shredding, the following should be removed: paper clips, rubber bands, staples, etc.

6.0 Please contact the COO with any questions or requests.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Purchasing**

Policy: The contained policy and procedures are designed to explain and facilitate understanding of the Purchasing functions at MFR Consultants, Inc. It addresses requisitioning, receiving, transferring, and replacement of supplies, materials, services, and equipment.

Purpose: **The COO holds the primary function of ordering materials**. His/her function is to purchase the supplies, materials, equipment and services required by MFR Consultants, Inc.

COO responsibilities include but are not limited to:

- Establishing purchasing policies, and dealing fairly with all potential sources of supply
- Obtaining supplies, materials, services, and equipment in an efficient and businesslike manner
- Consolidating purchases of like or common items
- Obtaining fair prices for materials, equipment, supplies and services
- Generally defining how to affect cost savings and coordinate purchasing and contracting procedures for MFR.

Scope: Policy and procedures are applicable to all MFR staff involved in the requisitioning, receiving, transferring, and replacement of supplies, materials, services, and equipment.

Procedures:

1.0 All requests for supplies, services, materials, and equipment, and all purchases will be made to the COO.

2.0 No staff member will purchase any materials, supplies, equipment, and contractual services without prior written authorization from senior management.

2.1 If a purchase is approved in writing and the employee uses his/her personal funds, then they will submit a "Reimbursement Request (Office Supplies)" to the COO.

2.1.1 Submit the original receipts along with the Reimbursement Request.

2.1.2 Staff requesting reimbursement must make a copy of the receipts and request form and retain them in their personal files.

3.0 Like purchases shall be combined for bidding and quantity discount pricing.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

3.1 All office supplies, general and graphic design, will be located in the supply cabinet in the kitchen and the two (2) bookcases located outside the kitchen.

4.0 Disbursement of Supplies

4.1 When a station runs out of supplies the staff member will submit a request with justification by E-mail to the COO.

4.2 The requisition for specialized items must be written to the COO by E-mail.

4.2.1 This request should contain a description, cost, and reason for purchase as it relates to the improvement and benefit of MFR Consultants, Inc.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Software Purchases**

Policy: Computer software, which is not sanctioned by MFR Consultants, Inc.'s IT Administrator, should not be purchased and/or downloaded without prior written consent from senior management or the IT Administrator. Downloading unauthorized software applications or from the Internet will not be tolerated.

Purpose: To maintain the integrity of the system's networking/server capabilities without depleting valuable disk space and introducing cyber viruses.

Scope: This involves all MFR staff, Senior Managers, and Consultants.

Procedures:

1.0 New software is not to be purchased unless a requisition and justification of long-term benefits has been submitted.
- 1.1 Submit the request by E-mail to the IT Administrator.
- 1.2 He or she will discuss the item with the CEO and return an answer to the person making the request within 48 hours.

2.0 The IT Administrator can then assess how much space the application will require on the system network.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Mail Receipt**

Policy: As a matter of policy and given MFR's operations within the federal market, for potential auditing purposes, mail must be promptly processed

Purpose: To ensure that mail is processed promptly and properly

Scope: This policy applies to senior level executives

Procedure: On a daily basis, the COO or her designee shall retrieve the mail. Upon retrieval, the COO shall take the incoming mail immediately to the President and CEO. The President shall subsequently sort through the mail and the COO will deliver the mail to the respective recipients.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Supply Delivery Receipt**

Policy: When ordered supplies are delivered to the MFR Office, the Operations Associate or designee will be responsible for unpacking materials and placing them into the supply cabinet or bookcases. If they are not available, then any employee may sign for the delivery.

Whoever signs for the delivery will check the boxes to assure the order is complete and correct. If the order is correct, then they are to initial the bill of sale and place it in the COO's mailbox. If the invoice and goods do not coincide, he or she will make a note and inform the COO.

Deliveries will be placed near the supply cabinet until the boxes can be unpacked and inventoried by the COO.

Purpose: To assist in inventory and quality control so as to maintain cost constraints. This policy is to help facilitate the understanding of what is to occur when ordered supplies are delivered to the company facility.

Scope: All MFR staff and senior managers.

Procedures:

1.0 On arrival of a supply delivery, any MFR staff or senior officer can sign for the receipt of the boxes.
2.0 Whoever accepts receipt of the delivery must check the contents of the packages against the bill of sale.
  2.1 Mark 'OK' and your initials on the bill of sale if the contents and invoice match.
  2.2 This denotes that the shipment was found to be complete and satisfactory.
3.0 If the delivered order is not correct.
  3.1 Submit a list of items to the COO that are:
    - Damaged
    - Not ordered but included in the shipment
    - Any omitted item
  3.2 Submit this list via E-mail.
  3.3 Include detailed description(s) of items listed.
4.0 Place the original bill of sale in the COO's inbox.
  4.1 The Operations Associate or designee will make a copy for the inventory files, and give the original invoice to the COO.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

5.0 Once the shipment has been checked-in, leave it, grouped together near the General Office Supply closet.

5.1 The Operations Associate or designee will be responsible for placing the shipment items into the supply closet and recording them on the inventory sheets.

5.2 Once the items have been placed in their proper places, the Operations Associate or designee will update the inventory supply list, denoting that the items were placed in the supply closet.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Facility Management**

Policy: Each employee at MFR Consultants, Inc. should work to keep the office neat and clean at all times. He or she is responsible for the well-being of their individual workspace. A thorough cleaning of the office and bathroom, and maintenance of the physical plant is the responsibility of the landlord.

Purpose: To foster and maintain a clean and professional work place.

Scope: The context of this policy and procedure encompasses all MFR staff, senior management, and consultants, located at corporate headquarters.

Procedures:

1.0 Workspace

- 1.1 Each individual staff member is responsible for keeping his or her work area neat and clean.
- 1.2 Staff must dust and wipe down their desk areas of spills and grime at least once a week.
- 1.3 All files should be in folders with labels identifying their associated project and client.
  - 1.3.1 Drawers are provided in each work area for filing.
  - 1.3.2 Spot checks for compliance will be made periodically.
- 1.4 Turn off and unplug all ancillary items (shredders, lamps, fans, space heaters) at the end of the work day.
- 1.5 Cover all computer equipment and accessories with dust covers at the end of the work day.
- 1.6 During work hours the dust covers are to be removed completely before turning on the office equipment. (CPU, monitor, keyboard, printers, etc.)
- 1.7 All equipment must be turned off before leaving at the end of the day.
- 1.8 Each staff member is responsible for keeping their electronic equipment clean and clear of dust.
  - 1.8.1 The monitors are to be cleaned **only** with clear water and a soft cloth or paper towel.
    - 1.8.1.1 Cleaning chemicals will ruin the finish that is on all of the monitors at MFR.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

1.9 If food is consumed in the work area, keep it away from the office equipment so as not to spill any contents and cause damage to the equipment.
1.9.1 Wipe up any spills or smears immediately.
1.9.1.1 Cleaning solution and paper towels can be found in the kitchen area under the sink.

2.0 The landlord is responsible for general cleaning of the office.

3.0 Report any irregularities immediately by E-mail to the COO.
3.1 This includes:
- Broken items (lights, equipment, furniture, etc.)
- Nonfunctioning items
- Flooding
- Water leaking from the ceiling
- Loss of power
- Missing equipment
- Vermin (rodents, ants, roaches, etc.)

3.2 The COO will relay this information to the landlord by memo and E-mail.
3.2.1 In the absence of the COO, the CFO will forward the information to the landlord.
3.2.1.1 A copy of the information will also be sent to the COO by E-mail for operational tracking purposes.

4.0 Kitchen
4.1 All MFR staff, senior officers, and consultants are responsible for cleaning up after themselves.
4.2 Clean up all spills and smears immediately.
4.3 All will clean their own dishes and utensils.
4.4 All will clean the dishes and cutlery used by their respective visitors (friends, clients).

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Invoice Processing**

Policy: The contained policy and procedure are designed to explain the protocol for invoice processing. It also addresses the responsibilities of various senior executives involved in the procedure. A clear protocol is necessary to ensure accuracy of accounts and timely payment of invoices.

Purpose: To establish the protocol for processing invoices and to ensure the payment of invoices

Scope: This policy applies to senior level executives

Procedures:

1.0 Invoices are received by the COO who reviews them for accuracy.
2.0 The COO date stamps the incoming invoices and records them on the invoice log, which includes information such as amount due, invoice date, and due date of payment.
3.0 The COO subsequently prepares an invoice voucher which is submitted to the President and CEO for signature approval.
4.0 A copy of the signed voucher is made.
5.0 Both the voucher and the invoice are given to the CFO for payment.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

Title: **Business Travel and Expense**

Policy: Employees may be required to travel in the course of their duties for MFR and will be reimbursed.

Purpose: To explain general procedures and standards in securing transportation in the course of employee duties.

Scope: These guidelines pertain to all MFR staff and interns. This policy refers to travel costs beyond daily costs to travel to and from work.

Procedures:

It may become necessary for employees to travel and/or entertain for client business. Requests to incur business travel and/or entertainment expenses must be approved in advance by your Manager. Once incurred, employees must complete a Travel and Expense Report (T&E) form and submit it to their Manager, along with all appropriate documentation, including original receipts, within 10 business days for approval. Failure to do so within the designated timeframe will delay reimbursement.

Applicable business expenses are defined as transportation, hotel accommodation, meals, and limited incidentals (for example, taxis and telephone calls) that meet financially reasonable and adequate standards for convenience, safety, and comfort that are consistent with the U.S. General Services Administrations (GSA) Per Diem Rates as posted by the GSA.

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.

POLICY & PROCEDURE ACKNOWLEDGMENT

I acknowledge that I have received a copy of the revised MFR Consultants, Inc. Policies and Procedures dated, September 2016, and I do commit to read and follow these policies.

I am aware that if, at any time, I have questions regarding MFR company policies I should direct them to my Manager or to the Human Resources Department.

I know that MFR company policies and other related documents do not form a contract of employment and are not a guarantee by MFR of the conditions and benefits that are described within them.

Nevertheless, the provisions of such MFR company policies are incorporated into the acknowledgment, and I agree that I shall abide by its provisions.

I also am aware that MFR, at any time, may change, add to, or delete from the provisions of the company policies with or without advance notice.

_____	_____
Employee Printed Name	Position
_____	_____
Employee Signature	Date

MFR at its option, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time with or without prior notice.