

Ukpeaġvik lñupiat Corporation And Subsidiaries

UIC Employee Handbook

UIC-HR-1-5-001

Last Updated: February 22nd, 2021

Table of Contents

Section 1 - Diversity

EQUAL EMPLOYMENT OPPORTUNITY	8
AFFIRMATIVE ACTION	10
DISABILITY ACCOMMODATION	14
RELIGIOUS ACCOMMODATION	
EMPLOYMENT PREFERENCE POLICY	

Section 2 - Employee Conduct

UIC CODE OF BUSINESS ETHICS AND CONDUCT	. 22
HARASSMENT-FREE WORKPLACE	. 27
EMPLOYEE CONDUCT	. 29
CONFLICT OF INTEREST	. 34
WORKPLACE VIOLENCE PREVENTION	. 36
NON-FRATERNIZATION	. 38
MEDIA RELATIONS	. 40
UIC ONLINE COMMUNICATIONS AND SOCIAL MEDIA POLICY	. 42
DRUGS & ALCOHOL ABUSE PREVENTION POLICY	. 44

Section 3 - Employee Information

CHAIN OF COMMAND	48
EMPLOYMENT CLASSIFICATION	52
JOB ROLE AND RESPONSIBILITY	55
SEPARATION FROM EMPLOYMENT	56
RECRUITMENT & HIRING	5 9
BACKGROUND INVESTIGATIONS	66
EMPLOYMENT PRACTICES, COMPLIANCE, HIRING	68
EMPLOYMENT OF RELATIVES	69

Page 2 of 167

IMMIGRATION LAW COMPLIANCE AND SPONSORSHIP OF VISAS	70
PERSONNEL AND MEDICAL RECORDS	72

Section 4 – Work Schedules and Attendance

WORK SCHEDULES AND TIMEKEEPING	74
ATTENDANCE	78
TELECOMMUTING	80

Section 5 - Compensation and Benefits

SALARY ADMINISTRATION	84
EMPLOYEE BENEFITS	87
SERVICE CONTRACT ACT (SCA) BENEFITS	90
TUITION REIMBURSEMENT POLICY	95
TRAINING AND CERTIFICATES	97

Section 6 - Employee Time Off from Work

LEAVE WITH PAY - PAID TIME OFF POLICY	100
HOLIDAY PAY	104
BEREAVEMENT LEAVE	107
JURY DUTY AND WITNESS LEAVE	109
MILITARY LEAVE	111
INCLEMENT WEATHER AND UNAVOIDABLE LEAVE	117
ABSENT WITHOUT LEAVE	119
LEAVE WITHOUT PAY	120
SUBSISTENCE LEAVE	122
FAMILY AND MEDICAL LEAVE	123
SICK LEAVE WITH PAY: FEDERAL CONTRACTORS	130

Section 7 - Performance Management

EMPLOYEE PERFORMANCE MANAGEMENT	
---------------------------------	--

CORRECTIVE ACTION	140
GRIEVANCES	145

Section 8 - Use of Company Equipment, Information Systems and Internet

ACCEPTABLE USE	146
INTERNET USAGE	152
ADMINISTRATIVE ACCESS TO COMPANY COMPUTERS	154
COMPUTER PASSWORD	156
COMPUTER CONSOLE LOCKOUT	158
TECHNOLOGY AND SOFTWARE COMPATIBILITY	159

Section 9 - General

TRAVEL AND EXPENSES	160
VISITORS IN THE WORKPLACE	162
ANIMALS IN THE WORKPLACE	163
USE OF TOBACCO AND RELATED PRODUCTS	164
APPEARANCE AND BELONGINGS	165
HOUSEKEEPING	167



The provisions described in the UIC Employee Handbook are applicable to all employees of UIC and its subsidiaries. The Employee Handbook is intended to provide you with a summary of selected formal company policies and programs. It is not intended to cover all policies and programs. Any conflict between the formal Company and/or subsidiary policies and programs and this Employee Handbook shall be resolved in favor of the formal company policies and programs available from Human Resources or your supervisor. The policies and procedures described are subject to the sole interpretation of the Company and are subject to change, modification, or deletion at any time, with or without notice.

If you have any questions about the Employee Handbook please talk with your supervisor or HR.

This document is an internal document and is therefore confidential and proprietary to the Company and cannot be used, disclosed, or duplicated without the prior written consent of the Company.

Thank you.



Employee Handbook Purpose

The purpose of this Employee Handbook (Handbook) is to provide you important information about working at UIC and UIC subsidiaries (Company). It also explains what our Company expects of you and is a starting point for most questions that you may have.

Scope of Handbook

Please note the policies found on Employee Portal replace all other handbooks that have been issued by either the corporate office or by subsidiaries of UIC

UIC has launched a project to review all policies to ensure that wherever possible, our policies are common and clear. Policies that have already gone through the review process have been replaced from this handbook and can be found on the Employee Portal.

Most recent version of the Handbook and updated policies can be found on the UIC employee portal (located on the bottom of the UIC website page at <u>http://www.uicalaska.com/</u>. Please log onto the employee portal using the same username and password for logging on to your computer. If you have trouble accessing the employee portal, contact your local IT helpdesk).

The employment policies remaining in this handbook and on the Employee Portal are applicable to **all** current employees and are intended to provide a description of UIC's employment expectations and practices.

Decision-making authority is with the UIC President (CEO) to waive or grant exceptions.

Reservation of Rights

The company reserves the right to add new policies, change policies, or cancel policies at any time. We will make changes through internal communication to help ensure that you are aware of changes in working conditions, benefits or employment practices. This Handbook is not a contract but rather an internal document considered to be confidential and proprietary to the Company. It is each employee's responsibility to read and understand all HR Policies set by the Company.

You are encouraged to visit the Internet-based UIC employee portal to view the Handbook or talk with your Supervisor or HR.

Responsibility for the Handbook

The UIC Human Resources (HR) Director is responsible for the content, updates, maintenance and dissemination of the Handbook, training of Supervisors and other applicable personnel, and policy training for employees.

Managers and Supervisors are responsible for ensuring that the personnel practices described in the Handbook are administered throughout the workplace in a consistent and



impartial manner. You are responsible for reviewing the employment expectations and working conditions described in the Handbook.



EQUAL EMPLOYMENT OPPORTUNITY

UIC-HR-2-6-003 Rev. 2

PURPOSE

The purpose of this policy is to state the company's commitment to ensuring equal employment opportunity (EEO) in all aspects of its interactions with employees and prospective employees. This policy shall be implemented in accordance with all applicable equal employment opportunity laws and regulations of the federal government and the states in which UIC operates.

ELIGIBILITY

This policy applies to all employees and applicants of the Company.

POLICY STATEMENT

The Company shall not discriminate against any employee or applicant because of race, color, religion, creed, sex, sexual orientation, gender or gender identity (except where gender is a bona fide occupational qualification), pregnancy, national origin, age, disability, military/veteran status, marital status, or genetic information. The Company is committed to the principle that all employees are entitled to equal opportunities in all aspects of employment.

The Company shall ensure that the Company's employment practices and other personnel actions are administered in a lawful and nondiscriminatory manner. This policy applies to all areas of employment, including recruitment, hiring, training, promotion, transfers, reassignments, career development opportunities, compensation, benefits, and social and recreational programs. The Company's employment practices shall be based on established merit principles of performance and qualifications. The Company is committed to providing reasonable accommodation to qualified individuals in accordance with the Disability Accommodation policy.

Any employee of the Company who fails to comply with this EEO policy shall be subject to disciplinary action, up to and including termination.

Reporting of violations

Employees and/or applicants who believe they have been discriminated against or who wish to file a complaint should do so by contacting your supervisor and/or HR. Complaints will be handled in the manner described in UIC's Code of Business Ethics and Conduct.

No person who files a complaint, assists in the processing or investigation of a complaint, or who opposes discrimination may be subject to retaliation for doing so. Retaliation is any adverse act or behavior against any individual who asserts his or her rights or who opposes in any way discrimination and harassment in the workplace, or who otherwise participates in the assertion of such rights.



EQUAL EMPLOYMENT OPPORTUNITY MANAGER

In furtherance of the Company's commitment to affirmative action and equal employment opportunity, the UIC Human Resources Director has the responsibility for designing and ensuring effective implementation of this Policy and Company's Affirmative Action Plan(s).

EXCEPTIONS

There are no exceptions to this policy.

REVISION HISTORY

Revision	Change Description	Author / Revised By	Approved By	Effective Date
00	Original Issuance	UIC HR	CEO/President	04/01/2011
			CEO/President	
1	Updated Policy Statement	General Counsel	Delbert Rexford	1/24/2019
			SOF	
			CEO/President	
2	Updated Policy Statement	General Counsel	Delbert Rexford	2/15/2019
			SOF	



AFFIRMATIVE ACTION

UIC-HR-2-6-002 Rev. 2

PURPOSE

The purpose of this policy is to define the Company's commitment to affirmative action and to provide for the development and implementation of an Affirmative Action Plan when required as a condition of federal contracts.

ELIGIBILITY

This policy applies to all employees.

POLICY STATEMENT

It is the Policy of the Company to take affirmative action to ensure equal employment opportunity in all Company policies and practices regarding recruiting, hiring, transfers, promotions, compensation, benefits, training, layoffs, and recalls from layoff. These policies and practices are administered without regard to race, color, religion, ancestry, national origin, age, disability, genetic information, sex (except where sex is a bona fide occupational qualification), marital status, and sexual orientation or veteran status. The Company's commitment to equal employment opportunity, including reasonable accommodations and freedom from harassment, are set forth in this and other Company policies.

The Company recognizes that hiring and other employment difficulties may be experienced by women, pregnant individuals, minorities, individuals with disabilities, and veterans. The Company is committed to the full and fair utilization of such persons in the workforce. Special measures may be required to achieve affirmative action within an organization and the Company promotes a determined and sustained effort in support of this Affirmative Action Policy Statement. It is the policy of the Company to take affirmative action to employ, and to advance in employment, all persons regardless of their status and to base all employment decisions only on valid job requirements. This effort includes the development and utilization of Affirmative Action Plans that may be required of the Company as a condition of certain federal contracts.

The Company shall work cooperatively with government agencies and civic and community organizations to take affirmative action to ensure equal employment and advancement opportunities.

Affirmative Action Plan(s):

As may be required to do business with the federal government, the Company shall prepare and maintain a written Affirmative Action Plan for the recruitment, hiring, and promotion of women, minorities, disabled individuals, pregnant individuals, and protected veterans. The Plan shall set forth the policies, practices, and procedures the Company is committed to in order to ensure that its policies of nondiscrimination and affirmative



action are accomplished. The Company will implement, monitor, and enforce this Policy and any Affirmative Action Plan in accordance with Governmental regulations promulgated by the U.S. Department of Labor (Office of Federal Contract Compliance Programs) under Executive Order 11246, as amended. Additional obligations are outlined in Section 503 of the Rehabilitation Act of 1973, as amended, and Section 402 of the Vietnam Era Veterans Readjustment Assistance Act of 1974.

An Affirmative Action Plan will be developed within 120 days from the commencement of the covered contract and will be updated annually. The Affirmative Action Plan is available for inspection by any employee or applicant for employment upon request.

Review of Personnel Processes:

The Company will annually review its personnel processes to determine whether its present procedures assure careful, thorough and systematic consideration of the qualifications of minorities, women, known individuals with disabilities and protected veterans. This review will cover all procedures related to the filling of vacancies either by hire or promotion, as well as training opportunities offered or made available to employees. Based upon this review, the Company will modify the personnel processes when necessary to ensure its policies of affirmative action and equal employment opportunity.

Recruitment:

All schools, colleges, employment offices, and other recruiting sources used by the Company are advised in writing of this Policy and are urged to refer all qualified minority group applicants, women, individuals with disabilities, and protected veterans. All solicitation advertisements state that the Company is an Equal Employment Opportunity Employer.

Placement and Promotions:

The Company reviews job classifications where minority persons, women, individuals with disabilities, or protected veterans may be underemployed. The Company seeks to determine the cause(s) for such deficiency and to remedy the underutilization of these employees in any of the job classifications. Placement, promotion, and transfer activities at all levels are monitored to ensure that full consideration has been given to qualified minority groups, female employees, individuals with disabilities, and protected veterans.

Training:

On-the-job training and educational programs to which the Company gives support or sponsorship are regularly reviewed in order to ensure that minority groups, women, individuals with disabilities, and protected veterans, as well as all other employees, are given the opportunity to participate. The Company takes steps to ensure that all training programs are accessible to all employees.

Layoffs, Terminations, and Demotions:



Layoffs, terminations, demotions, and recalls from layoff are made without regard to race, color, religion, ancestry, national origin, age, disability, sex (except where sex is a bona fide occupational qualification), pregnancy, marital status, genetic status, sexual orientation or veteran status. Full consideration is given to the employment of persons with disabilities for work that they are qualified to perform.

Employee Benefits and Compensation:

The Company is committed to equal pay and to ensuring that there is no disparity in the compensation received by minorities, women, or other protected class employees who are performing equivalent duties. Opportunities for performing overtime work or other increased earning compensation are afforded without discrimination.

Goals and Timetables:

The Company establishes goals designed to alleviate any underutilization of minorities, women, individuals with disabilities, and protected veterans. Timetables are established prescribing when these goals should be met. The Company makes a good faith effort to fulfill its goals and meet its timetables.

Progress Reporting:

The Company maintains documentation that reflects progress under this Policy, and the records are available for inspection at any time by appropriate government representatives. The Company establishes a formal reporting and auditing system to measure the attainment of its goals and furnishes information as may be required to comply with the applicable orders and regulations.

EQUAL EMPLOYMENT OPPORTUNITY MANAGER

In furtherance of the Company's commitment to affirmative action and equal employment opportunity, the UIC Human Resources Director has the responsibility for designing and ensuring effective implementation of this Policy and Company's Affirmative Action Plan(s).

EXCEPTIONS

There are no exceptions to this policy.

REVISION HISTORY

Revision	Change Description	Author / Revised By	Approved By	Effective Date
00	Original Issuance	UIC HR	CEO/President	05/01/2011



Updated Lavoffs		CEO/President	
Terminations and	General Counsel	Delbert Rexford	1/24/2019
Demotions section.		SOF	
Indated Policy Statement		CEO/President	
	General Counsel	Delbert Rexford	2/15/2019
		SOF	
	Demotions section. Updated Policy Statement and Affirmative Action	Terminations and Demotions section.General CounselUpdated Policy Statement and Affirmative ActionGeneral Counsel	Updated Layoffs, Terminations and Demotions section.General CounselDelbert Rexford SOFUpdated Policy Statement and Affirmative Action Plan(s) section.General CounselCEO/President Delbert Rexford



DISABILITY ACCOMMODATION

UIC-HR-2-6-013 Rev. 1

PURPOSE

The purpose of this policy is to implement the Company's commitment to equal employment opportunities for individuals with disabilities. This commitment includes providing reasonable accommodations and equal access to technology and information that applicants and employees with disabilities need to apply with the Company and to perform the essential functions of their jobs.

ELIGIBILITY

This policy applies to all employees and prospective employees with disabilities, as that term is defined by the Rehabilitation Act, the Americans with Disabilities Act (ADA), and applicable state law.

POLICY STATEMENT

Consistent with these laws, individuals with disabilities are those individuals who have an impairment that substantially limits one or more major life activities, without regard to mitigating measures; have a record of such an impairment; or are regarded as having such an impairment that is not transitory (i.e., temporary) or minor.

"Major life activities" include functions such as hearing, seeing, speaking, breathing, performing manual tasks, walking, caring for oneself, learning, or working.

In the context of impairments affecting the major life activity of working, "substantially limits" means significantly restricted in the ability to perform either a class of jobs or a broad range of jobs in various classes as compared to the average person having comparable training, skills, and abilities. The inability to perform a single, particular job does not constitute a substantial limitation in the major life activity of working.

Reasonable accommodations include: modifications or adjustments that enable qualified individuals with disabilities to apply for a job and/or perform the essential functions of a job (i.e., those functions that are so fundamental to the job that the individual cannot do the job without being able to perform them); modifications or adjustments that enable individuals with disabilities to enjoy equal benefits and privileges of employment; and modifications or adjustments needed to provide equal access to technology and information.



The Company will provide reasonable accommodations to otherwise qualified individuals with disabilities, absent undue hardship on the Company's operations. The provision of a requested accommodation may result in undue hardship where it is imposes significant difficulty or expense, including significantly impacting the ability of other employees to perform their duties, or the ability of the Company to carry out its functions, or fundamentally alters the nature or operation of the Company's business.

Any applicant or employee who requests an accommodation should contact the individual's supervisor or the HR Department.

In making this request, the individual should specify what accommodation he or she requests and explain how the accommodation(s) will enable the individual to perform the essential functions of the job. HR will then work with the individual in an interactive process to assess the nature of the individual's impairment/health condition (i.e., does the individual have a "disability" as defined by federal law), how that impairment/health condition limits his/her ability to perform the essential functions of his/her job, and what accommodations are available, feasible, and/or appropriate under the circumstances. During the interactive process, the Company should not inquire as to the individual's family medical history or genetic information.

Decisions on accommodation requests should be made as expeditiously as possible; where feasible, such decisions should be made within seven (7) business days of the date of the request or receipt of supporting medical documentation, where such documentation is requested, whichever is later. If a decision will not be made within that time frame, the individual should be notified of the status and reasons for the delay. If the parties identify an accommodation that will allow the employee to perform the essential functions of the job and that is reasonable and will not impose an undue hardship, the Company will make the accommodation. Where feasible, once an accommodation request is approved, the accommodation should be provided and/or implemented within fifteen (15) business days of the approval.

The Company and any managers or employees involved in the accommodation process shall maintain the confidentiality of all information and documents received in connection with an accommodation request. All such documentation will be maintained separate and apart from an individual's personnel file and will be maintained in a secure location. Access to such information and documents is strictly limited to those employees with an identifiable need to know as part of the accommodation process.



EXCEPTIONS

There are no exceptions to this policy.

REVISION HISTORY

Revision	Change Description	Author / Revised By	Approved By	Effective Date
00	Original issuance	UIC HR	CEO/President	04/01/2011
			CEO/President	
1	Updated Eligibility section	General Counsel	Delbert Rexford	2/15/2019
			SOF	



RELIGIOUS ACCOMMODATION

UIC-HR-2-6-004 Rev0

PURPOSE

The purpose of this policy is to respect the religious beliefs and practices of all employees and prospective employees and to make, upon request, a reasonable accommodation for religious observances when an accommodation is available that does not create an undue hardship for the Company

ELIGIBILITY

This policy applies to all employees and job applicants.

POLICY

The Company prohibits discrimination against employees or applicants in hiring, firing, and other terms and conditions employment because of the individual's religious beliefs or practices. The Company further prohibits religious harassment of employees in the workplace. Employees who believe they have been harassed because of religious beliefs or practices should report it to their supervisor or Human Resources.

It is recognized that there are times when an individual's religious beliefs or practices may conflict with his or her job, work schedule, the Company's policy or practice on dress and appearance, or with other aspects of employment. The Company provides reasonable accommodation for the religious practices of employees or prospective employees unless to do so would create an undue hardship for the Company. An employee who seeks a religious accommodation must submit a written request for the accommodation to his or her immediate supervisor. The supervisor will work with Human Resources in evaluating the request.

Evaluation of a request will include whether or not a work conflict exists due to a sincerely held religious belief or practice and whether an accommodation is available that is reasonable and will not create an undue hardship on the Company's business or operations. An accommodation may cause undue hardship if it is costly, compromises workplace safety, decreases workplace efficiency, infringes on the rights of other employees, or requires other employees to do more than their share of potentially hazardous or burdensome work. The supervisor or Human Resources will confer with the employee to discuss the request and the decision on accommodation. If the employee is not satisfied with the decision on accommodation, he or she may appeal utilizing the Company's grievance policy.

Applicants for hire will not be asked to discuss religious beliefs or any religious accommodation that may be required after hire.

EXCEPTIONS

There are no exceptions to this policy

PRINTED COPIES ARE NOT CONTROLLED



REVISION HISTORY

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	CEO/President	04/01/2011



EMPLOYMENT PREFERENCE POLICY

UIC-HR-2-6-062 Rev 0

Purpose

UIC is committed to improving the economic well-being of our shareholders and their families through dividends, investments in the Barrow community, shareholder professional development, and other channels.

Eligibility

This policy applies to all employees.

Policy

UIC measures results in shareholder development by the success stories our shareholders and their families can tell. An important part of shareholder development is providing UIC shareholders, their spouses and their children with employment within UIC's family of companies in a manner that is consistent with UIC's overall business success and our commitment to providing returns to our entire population of shareholders.

Providing an employment preference directly benefits UIC shareholders, their spouses and their children economically; but must be achieved through employment that is driven by business needs and responsibilities executed in a manner that contributes to UIC's overall business success and our ability to provide returns to our shareholders through dividends, investments in the Barrow community, and other channels.

For this reason, UIC exercises an employment preference in favor of UIC shareholders, spouses of UIC shareholders and the children of UIC shareholders, and gives clear guidance to management on how that preference is to be applied through this policy, associated procedures, and recruiting processes and systems.

The larger Shareholder Development Program provides other employment channels for our shareholders and their families, and prepares shareholders of today and tomorrow for opportunities available now and in the future through these channels. This will include partnerships with other Alaska Native Corporations, schools, development organizations, and others.

Further, UIC recognizes that the success we enjoy today and tomorrow depends on the contributions of all employees, and we wish to provide our proven contributors a path forward at UIC to further their careers. With that goal in mind, we provide preference to our employees, as well. In addition, we share goals and are often partners with other Alaska Native Corporations, and extend preference to their shareholders as well.



(a) EMPLOYMENT PREFERENCE ORDER OF PRIORITY

The hiring manager, with the support of UIC or subsidiary Human Resources, is responsible for ascertaining the shareholder status of applicants and applying the preference policy described below in this order of priority:

UIC Shareholder Descendant of UIC Shareholder Spouse of UIC Shareholder Non-Shareholder (Employees in good standing) Shareholder of Other ANC

(b) THE PREFERENCE POLICY

UIC hiring managers and their supporting parent or subsidiary Human Resources have a responsibility to proactively seek qualified applicants with an employment preference listed in subsection (a) above to apply for posted UIC positions. This includes posting all job openings internally, communicating openings through any available channels to potential candidates within the scope of subsection (a) above (e.g. newsletters, posting updates via emails, etc.), or through direct recruitment of qualified candidates.

An applicant who is well-qualified for a vacant position at UIC or one of its subsidiaries, and has an employment preference listed in subsection (a) above, should be hired in preference to an applicant who does not have an employment preference.

"Well qualified" is defined as meeting the minimum qualifications for the job AND demonstrating through the job application process, interviews, observations of performance, references, or a combination thereof that the quality of education, experience, other qualifications, past performance, and interactions with subordinates, peers, superiors, and external parties have been such that the individual would be well-suited to perform at or above expectations for the job being pursued.

With regard to the Order of Priority set out in subsection (a) above, a well-qualified applicant with a higher-tier employment preference must be considered for hire in preference over an applicant with a lower-tier employment preference.

Should an applicant who has an employment preference listed in subsection (a) above apply for a job and not be awarded the position for a reason defined in (2) above or subsection (c) below, the supporting parent or subsidiary Human Resources department has an obligation to contact the applicant to identify the reason for the decision, notify the Shareholder Development Manager of same, and to refer the individual to the Shareholder Development Manager for support and guidance to improve their qualifications in preparation for future employment opportunities and to help identify any current or impending employment opportunities within UIC or through other channels within the Shareholder Development Program.

Nothing in this Policy shall exempt any employee from the applicability of any other Personnel Policy, including those related to job performance, standards of conduct or



discipline. Nothing in this Policy shall give any employee any rights beyond the "at-will" employment policy of UIC and its subsidiaries. Nothing in the Policy shall create in any employee any right of continued or guaranteed employment.

The scope of this Policy extends to UIC and all of subsidiaries, and it shall apply to the filling of vacant positions at UIC and its subsidiaries, including promotions and transfers.

All UIC and subsidiary management involved in the hiring, promotion and transfer of employees shall be responsible for carrying out this policy at the parent and subsidiary companies, including line management, senior management and Human Resources. The UIC President/CEO has ultimate responsibility to ensure that all management of UIC and its subsidiaries involved in the hiring, promotion and transfer of employees are in compliance with this Policy.

Exceptions

The UIC President/CEO, upon the recommendation of a Vice-President of Operations and/or the UIC Human Resources Director, may waive the application of this Policy, for example, in situations where expedited processes are required to make emergency or temporary hires, and in other situations where full formal application of this Policy may be impracticable.

REVISION HISTORY

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	CEO/President	04/10/2012



UIC CODE OF BUSINESS ETHICS AND CONDUCT

UIC-LEGAL-2-6-024 Rev. 2

PURPOSE

Our mission is to be a recognized business leader for providing quality services, solid profitability, and shareholder value. The following Code of Business Ethics and Conduct is a critical component to our mission in holding our reputation and trust to a high standard. The purpose of the Code of Business Ethics is to protect and preserve our reputation that is our most valuable asset and depends on our combined and individual decisions.

SCOPE

All of Ukpeaġvik Inupiat Corporation's, and its subsidiaries' (collectively "UIC"), employees and the members of the Board of Directors are expected to understand and follow this Code. In addition, contractors, consultants, and others who perform services with UIC should also follow these principles in the work they do for us. Failure to follow our Code will result in disciplinary actions or loss of relationship with UIC.

POLICY STATEMENT

Four Guiding Principles For Ethics and Compliance

Ethical practices should be incorporated into daily business and everyday transactions by following the general principles of this Code which include the following:

- 1. Respect the law.
- 2. Act with integrity by being honest, fair, and respectful to others.
- 3. Protect the interests of the company and our shareholders.
- 4. Be professional and make ethical conduct part of UIC's culture.

INTEGRITY

UIC expects its employees to act with integrity by being fair and honest in business transactions and communications within UIC and with others. Employees should safeguard and properly use information and assets for legitimate business purposes only and always conduct business with professionalism and fairness. Opinions should be shared and welcomed with dignity, courtesy, and respect. UIC has zero tolerance for discrimination against and harassment of its employees and others.

Business and Financial Records

UIC relies on its business records to manage and grow our company, as well as take stock of our financial health. Every employee and Board member should



follow internal controls to ensure that our company business books and records are secure, clear, accurate, and complete. Examples of important business records include financial and governmental reporting (including annual reports to shareholders), as well as employee timesheet and expenses properly documented with receipts. Furthermore, important business transactions should always be conducted in writing.

Company Assets

UIC's company assets belong to the company, and shall be used in accordance with their intended use and within company guidelines and policies. Examples of such assets include company funds (including company credit cards), company time, proprietary information, UIC's IT network, or other business equipment and opportunities. Any theft, unauthorized personal use, or other misuse of company assets will result in disciplinary action. Employees shall be prudent with company expenses and not spend or commit company assets recklessly or without authority to do so.

Confidentiality and Non-Disclosure

Employees have a duty to protect UIC's nonpublic information at all times. Examples of sensitive information include UIC's trade secrets, financial records, strategic business plans, pricing and sales data, and business partner information. When disclosure of such information is required for business purposes, a confidentiality agreement should be executed to protect UIC's interests. UIC personnel also may not disclose the personal data of UIC's employees and customers except for legitimate business purposes or to the extent required by law. Within the company, sensitive information should always be provided only on a need-to-know basis, for valid business purposes.

Political Activity

UIC supports participation in political processes and community activities during personal time so long as it is consistent with relevant laws and company policies. Employees may not, however, engage in any activity on behalf of the company that is intended to influence legislation or rulemaking, or engage lobbyists, unless previously authorized in writing by UIC counsel. Any campaign contribution that uses corporate funds or other company resources must be also be pre-approved by UIC. UIC cannot, and will not, use federally appropriated money to influence or attempt to influence government employees or officials in connection with any government contract. Please note that if you plan to run for public office, you should also promptly inform your supervisor.

CONFLICTS OF INTEREST



As a representative or employee of UIC, at all times, you have a duty to act in the best interests of the company and its shareholders and to protect UIC's reputation. Some examples of areas where a Conflict of Interest may occur and that are particularly important to be aware of include: decisions involving friends or families, gifts/entertainment, outside employment (including serving on other boards), bonuses, discounts, favors, or other opportunities that provide you with personal gain. Such conflicts may be addressed by fully disclosing the conflict for proper resolution which may involve declining the opportunity, removing yourself from the decision-making process, and/or seeking proper approvals. Whenever your personal interest or gain is at odds with the company's interests, you should put the company first.

Always remember that the acceptance of gifts, entertainment, other business opportunities or favors from a third party (such as consultants, suppliers, or vendors) can create a conflict of interest, or the appearance of a conflict of interest, which should be avoided. Giving excessive gifts, entertainment opportunities (such as trips), or special favors to clients, family or friends can also give rise to a conflict of interest. Such actions may compromise (or appear to compromise) the impartial evaluation of business decisions that affect the company. Only minor "token" gifts may be permissible, provided that they are incidental, modest, inexpensive, and do not create the appearance of impropriety. For example, gifts are strictly prohibited during contract negotiations. Accepting cash gifts of any kind at any time is also prohibited, as is giving gifts of any value to governmental employees or officials. The company and all employees are expected to comply with the Foreign Corrupt Practices Act. If you have a question regarding the propriety of a specific opportunity or gift, please consult your manager who may direct you to additional resources or ask for assistance.

SAFETY & WELFARE

UIC has established a Health, Safety and Environmental (HSE) Program to ensure the safety of its employees, customers, and visitors, as well as its property and equipment. To keep UIC incident free, employees should immediately report any unsafe conditions in the workplace and are encouraged to raise concerns about situations that could put others at risk. UIC also maintains a zero-tolerance policy when it comes to acts or threats of workplace violence. The success and welfare of UIC personnel depends on everyone's commitment to being alert, watchful, and responsive to safety communications.

Substance abuse in particular puts at risk the safety and welfare of UIC's shareholders, employees, and communities. As part of UIC's commitment to maintaining an alcohol and drug-free workplace, UIC strictly prohibits the use or



possession of such substances while operating UIC-owned equipment, conducting UIC business, or whenever present on UIC-controlled premises.

CONTACT

If you have a question related to this Code of Conduct, there are many resources within UIC where you can seek assistance, including your supervisor or manager, a Human Resources representative, and/or the Ethics & Compliance helpline at 1-888-373-8855 (also accessible online at <u>UICEthicsReport.com</u>). HR discrimination and harassment matters should initially be reported to your HR representative. If you elect to make a report to the Ethics & Compliance helpline, while identifying yourself may facilitate communications and the investigation of your complaint, you may also remain anonymous. To the extent possible and consistent with conducting a fair investigation, UIC will strive to keep Ethics & Compliance reports confidential, on a need-to-know basis, to the greatest possible extent. While UIC may not be able to provide the complainant with information pertaining to actions taken in response to a complaint, UIC is committed to prompt and effective corrective and preventative action when warranted.

As a Department of Defense contractor UIC encourages our employees to utilize the DoD Hotline to report items of concern to DoD. This includes suspected threats to Homeland Security, Unauthorized disclosure (Leaks) of Classified Information, and Fraud, Waste and Mismanagement. DSS hotline 800-424-9098 or <u>www.dodig.mil/hotline</u>

No Retaliation

UIC takes this Code of Conduct very seriously and will not tolerate any retaliation against any person who reports, or participates in an inquiry, in good faith of a possible violation of the Code. Managers are expected to foster a culture and an environment in which employees will be comfortable raising concerns without fear of retaliation.

EXCEPTIONS

None

REVISION HISTORY

Revision	Change Description	Author / Revised By	Approved By	Effective Date
0	Original Release	Andrew Mitton General Counsel	Board of Directors	2007



1	Clean Umiaq brochure converted into the Handbook Policy format.	Rick Owen General Counsel	Price E. Brower Chairman of the Board SOF	11/16/2018
2	Updated Contact Section.	Rick Owen General Counsel	Price E. Brower Chairman of the Board SOF	1/24/2019



HARASSMENT-FREE WORKPLACE

UIC-HR-2-6-021 Rev 0

PURPOSE

The purpose of this policy is to ensure that all employees are free from unlawful harassment.

ELIGIBILITY

This policy applies to all employees.

POLICY

Employees should be free from harassment on the job, including sexual harassment, whether from co-workers, supervisors, managers, customers or clients. Harassment based upon age, race, gender, sexual orientation, gender identity, religion, marital status, color, creed, national origin, citizenship, military or veteran status, physical or mental disability, or genetic information is prohibited.

Harassment is defined as behavior, whether verbal (e.g. innuendo, epithets, remarks, slurs, jokes, propositions, sounds), physical (e.g. body gestures or contact), or visual (e.g. cartoons, calendars, etc.) that has the purpose or effect of making another person uncomfortable, insulted, afraid, or embarrassed and (1) submission to such conduct is made either explicitly or implicitly a term or condition of employment, or (2) submission to or rejection of such conduct is used as the basis for an employment decision, or (3) such conduct interferes with an employee's ability to perform the job or creates an offensive or hostile work environment.

The Company will not condone or tolerate the harassment of its employees. All employees, regardless of position or title, will be subject to discipline, up to and including termination of employment, should the Company determine that the employee is engaged in the unlawful harassment of another employee. The Company will promptly and thoroughly investigate the facts and circumstances of any claim or allegation of harassment.

The Company strongly encourages employees to report conduct that they believe constitutes harassment. The employee may report harassment directly to his or her supervisor, or to the supervisor's manager or to the Director of Human Resources. It is the responsibility of any employee, supervisor, or manager aware of possible harassment to bring it to the attention of management.

No one will be subject to, and the Company prohibits, any form of discipline or retaliation for reporting incidents of harassment or assisting in an investigation of a harassment complaint. Human Resources, in conjunction with the supervisor, where appropriate, will conduct all investigations in a prompt manner and take corrective action as appropriate.



EXCEPTIONS

There are no exceptions to this policy.

REVISION HISTORY

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	CEO/President	04/01/2011



EMPLOYEE CONDUCT

We expect you to conduct yourself with pride and respect associated with your position, fellow employees, customers, suppliers and everyone associated with the Company in one form or another. We expect that you use good judgment, discretion and conduct yourself with the highest standards of ethical conduct in performing the Company's business. The reputation of our Company depends on each and every employee applying common sense and strong personal ethics to all situations. We expect you to abide by our policies and work rules of general conduct and performance at all times. We also expect that you follow work rules and conduct yourself in ways that protect the interest and safety of all employees and the Company. Unethical business conduct, including actions or even the appearance of unethical behavior, is unacceptable under any condition.

Generally, there are generally three types of transgressions that constitute misconduct:

Policy and procedure violations

Performance issues

Behavior and conduct issues

These actions and/or behaviors may occur simultaneously and they may be addressed individually or collectively by your supervisor. Any resulting disciplinary action is dependent on the nature and severity of the offense(s). Disciplinary action may include a verbal warning or written warning that would be included in your personnel file. Also, discipline may include administrative leave or suspension up to and including termination.

CONFLICT OF INTEREST

A conflict of interest can arise in dealing with anyone with whom the Company transacts business: customers, clients, owners, buyers, suppliers, banks, insurance companies, and people in other organizations with whom we contact and make agreements.

Any situation involving a possible conflict of interest (or perceived conflict), which arises in relation to your work with the Company, must be brought to the attention of your immediate supervisor or manager. Any questions regarding potential conflicts of interest may be discussed with your HR representative.

CONFIDENTIALITY

The Company requires you to maintain a strict code of confidentiality of information. You should not store information outside of the Company (either written or electronic form) about any matter pertaining to the conduct of the Company's business. Information regarding the Company's purchase prices or manufacturing or intellectual processes shall not be given to any party without the express written permission of the UIC President/CEO. Conversations regarding prices, service, problems, gossip, etc. about one vendor or customer to another are prohibited. Any employee who compromises information or disseminates information may be subject to disciplinary action or dismissal.



Proprietary information is also safeguarded. Each employee or consultant that works for our company must refrain from disclosing information to anyone that is not connected to their assigned duties. Employees are not permitted to support a competitor's effort to solicit services, gain market advantage, cause any customer or client of our company to terminate their business relationship, or contract or assist a competitor with a competitive contract or subcontract. Employees are not to solicit or cause any employee of the Company to terminate or modify their employment with our Company.

BRIBES, KICKBACKS, AND ILLEGAL PAYMENTS

Bribes, kickbacks and other illegal payments to or from any individual with whom the Company conducts business (in any form and for any purpose) are prohibited. Certain types of rebates to the Company from suppliers are legitimate to correct commercial inequity if done within government trade regulations. Certain types of rebates to or from individual employees are prohibited.

You should not accept anything of value (e.g., gifts, entertainment, travel) that exceeds fifty dollars (\$50.00) from Company subcontractors, potential subcontractors, vendors, or potential vendors. Nothing of value (e.g. gifts, entertainment, travel) may be provided to government personnel unless clearly permitted by law.

PATENTS, TRADEMARKS, AND COPYRIGHTS

We do not allow the unauthorized use, installation, copying, or distribution of copyrighted, trademarked, or patented material on the Internet or elsewhere. You are also responsible for making sure that anyone who sends you material over the Internet has the appropriate distribution rights.

It is our policy that all inventions, improvements, and discoveries, made by employees that relate to our business remain our property. In addition, such inventions, improvements and discoveries will not be disclosed by current or past employees without prior written consent.

Any patent or copyright developed by an employee is property of the Company and must remain on Company premises. Approval by the UIC President or COO must be given prior to any sharing of internal information.

If you present at conferences, publish information, or pass on any Company-related information to third parties and receive any compensation for such sharing, information and compensation is property of the Company. Any violation of these policies can lead to the immediate termination of employment and may have legal consequences.

COMPANY CREDIT CARDS

If you are authorized to use a Company credit card, you are responsible for protecting its use and for submitting all credit card receipt before payment of the credit card invoice. You must comply with the UIC Credit Card Policy and Procedures Manual which is provided by the Finance and Accounting Department and a Credit Card Agreement is signed at the time you receive a card.



You should not use the credit card for personal reasons under any circumstances. If you misuse the card, it will be canceled and you could be subject to disciplinary action. The employee will be required to sign a Credit Card Agreement prior to receiving the card.

We do not provide cash travel advances. In special circumstances (travel to remote sites) you may be given a cash travel advance.

TELEPHONE USE, POSTAGE, AND SUPPLIES

Personal use of Company telephones should be kept to a minimum and be brief. Personal long-distance calls should not be made. Proper and courteous communication etiquette should be used in your business communications. Personal use of office supplies, postage or postage meter is strictly forbidden.

COMPANY INFORMATION SYSTEMS

The Company information systems include Company and customer-owned personal computers, software, intra-company network access, Internet access and email. Company clients may provide additional hardware or software for the sole purpose of the client. You will be given access to the appropriate applications, networks, and files and are expected to use these resources in a productive, effective, and ethical and legal manner. You should not have a reasonable expectation of privacy for any material that you receive, enter or save on one of our computers, servers, networks, disks or email system, or that of a client. We have the right to monitor and control all aspects of, and all data contained within, our system including email and internet browsing.

General Computer Use

Automated back-up systems are in place on the UIC system. However, you are ultimately responsible for backing up critical data and should store data on the Company server rather than you individual computer. You may not restrict access to your computer or any of its programs or data without permission of your supervisor and IT. Likewise, you should not retrieve access information that is restricted without authorization. Actions that are contrary to these are subject to discipline up to and including termination.

You may only connect to our remote access or wireless feature via an encrypted wireless network, including your home network. This is necessary to avoid improper or illegal outside access to confidential Company data. IT is authorized to load software on a Company computer. You may not load any software onto your computer, as it is our intention to prevent viruses and the possibility of illegal software use. Your supervisor and IT must approve movement of computer equipment between work locations.

Soft lifting/Software Piracy

We buy and license computer software for business use and do not the copyright to this software or its documentation. Unless the software developer provides authorization, we do not have the right to make use the software on more than one computer, make copies of software (Soft lifting) or use software reproductions (Software Piracy). These actions violate the U.S. copyright laws and are illegal. Likewise, Copyrighted software



documentation may not be reproduced. You may use the original documentation for reference or print versions that are electronically stored.

Violation of these policies is a serious matter and is cause for disciplinary action up to and including termination. Also, a violation may be grounds for civil charges by the copyright owner and/or potentially be subject to criminal prosecution.

The federal or state government may impose more restrictive requirements. If you use information systems specific for government projects, you are expected to comply with their requirements.

Email and Internet Use

The equipment, services, and technology that you use to access the Internet and email system are Company property. We reserve the right to monitor your use, find and read any data that you write, send, or receive. You do not have a reasonable expectation of privacy. In addition, we can be legally required to provide this information to law enforcement or other parties. You should always ensure that the business information contained in Internet email messages and other transmission is accurate, appropriate, ethical, and legal.

You may use your Company email access and Internet for limited personal communication and personal use during breaks and before and after work. You should not abuse this privilege. Internet "chat" channels may be used only in the performance of job-related duties.

You may not write, send, read, or receive data through the Internet that contains content that could be considered discriminatory, offensive, obscene, threatening, harassing, intimidating, or disruptive to any employee or other person. Examples of unacceptable content include (but are not limited to) sexual comments or images, racial slurs, genderspecific comments, or other comments or images that could reasonably offend someone on the basis of race, age, sex, religious or political beliefs, national origin, disability, sexual orientation, or any other characteristic protected by law. Managers and supervisors may determine inappropriate sites as well. Any inappropriate material found on any computer or file will be presumed to have been accessed intentionally.

CELLULAR TELEPHONES AND "BLACKBERRIES"

The Company may provide cellular telephones to certain employees for business use. Personal calls should be limited and you should use the same discretion as you do using land-line business telephones. Similar to other computer equipment, the devices should be locked with password access as this provides a level of security if the device is lost or stolen. You should not have a reasonable expectation of data privacy for information from Company email-enabled telephones or "Blackberry" equipment.

<u>SAFETY</u>

Our workplace safety program is a top priority at UIC. We want UIC to be a safe and healthy place for employees, customers, and visitors. A successful safety program



depends on everyone being alert and committed to safety. (The following link is to the HSE site. It provides details on company policies, training requirements, compliance reporting and other important matters of our entire program (<u>http://employeeportal.uicalaska.com/HSETDocumentLib.htm</u>. To access the HSET link, log on to the employee portal through the UIC website <u>http://www.uicalaska.com/</u>, click on employee portal on the bottom of the page, and enter your user name and password).

The Company is committed to the safety of its employees, our property, and equipment. We use a safety program in daily operations. The Company established the UIC Health, Safety and Environmental (HSE) Programs, Procedures and Guidelines for use by all employees. You are responsible to review and become familiar with the UIC HSE training (HSET) requirements for your position. Please see the attached link for access to the HSE site (http://employeeportal.uicalaska.com/HSETDocumentLib.htm).

We regularly communicate with you about workplace safety and health issues. You will see a variety of communication methods as we not only ensure that you are aware but also that you and every supervisor and employee receives workplace safety and health training to eliminate or reduce hazards. We also expect to hear about your ideas or concerns and ask that you talk with your supervisor or HSE manager. Also, report any concerns about workplace safety either anonymously or directly without fear of reprisal.

You are expected to comply with all safety rules and be careful at work. You must immediately report any unsafe condition to your supervisor no matter how minor it may seem. This will allow for an immediate response and if necessary an investigation and or insurance or worker's compensation processing. If you violate UIC safety standards, you may be subject to disciplinary action, up to and including termination. Violations include causing a hazardous or dangerous situation, not reporting a hazardous or dangerous situation, and not correcting a problem even though you could have corrected it.



CONFLICT OF INTEREST

This policy works in conjunction with the UIC Code of Business Ethics and Conduct. We have guidelines to avoid real or potential conflicts of interest. It is your responsibility and duty and an employee to follow this Code. If you have any questions about conflict of interest, please talk with your supervisor or HR.

Interaction with Other Companies

You must work within the guidelines of our Conflict of Interest policy when you conduct business with another company. Our business dealings with other companies should not result in unusual gains for them. Unusual gains are defined a bribes, product bonuses, special fringe benefits, unusual price breaks, and other windfalls that will benefit the other company or an employee of that company.

A conflict of interest is an actual or potential situation to influence a decision or have business dealings that may result in a personal gain for you or one of your relatives. Please refer to the previous section on Employment of Relatives/Nepotism. Personal gains also include you or your relative receiving a kickback, bribe, substantial gift, or special consideration as a result of a transaction or business dealing with UIC.

If you have any influence on transactions involving purchases, contracts, or leases you must tell an office of UIC as soon as possible. We will set up safeguards to protect everyone involved.

Outside Employment

The Company reasonably expects you to devote your best efforts, energies and skills to the discharge of your job duties. Outside employment may not create a conflict with your work schedule, responsibilities, or performance with UIC. However, outside employment must be approved in writing in advance by the Subsidiary General Manager in consultation with Human Resources.

You may not conduct outside employment activities during work hours, nor may you use our facilities or equipment.

A UIC employee will not:

Be employed, or act as a director, officer, employee, consultant, agent, independent contractor, or having any other form of relationship outside the scope of employment with the Company which involves providing personal services to a company that does business with, or competes with, the Company or any of its subsidiary companies.

Be employed, or act, as an independent supplier of services or materials or leasing property or equipment to the Company or any of its subsidiary companies without full disclosure;

Have ownership interest in any entity that does business with or is a competitor of the Company or any of its subsidiary companies;



Accept gifts, loans, entertainment or other favors for personal use in excess of \$50.00 from any outside organization that does business with the UIC. However, gifts of more than \$50.00 are acceptable if the gift is not for personal use and is used for distribution to other UIC employees (e.g., tickets for a sporting event);

Disclose UIC's, or any of its subsidiary companies' or subcontractors', proprietary or private information or data;

Compete directly or indirectly with the Company or any of its subsidiary companies; or

Provide your resume to a competitor for a position or contract that the Company or any of its subsidiary companies are bidding.

NON-DISCLOSURE

This policy works in conjunction with the UIC Code of Business Ethics and Conduct.

It is very important to the Company that we protect our confidential business information and trade secrets. Confidential information includes, but is not limited to, the following examples:

Personnel records, personnel information, and compensation data

Computer processes, programs, and codes

Customer information including data, information, lists, preferences

Financial information

Strategic information including business development, labor relations, marketing, new materials research

Pending projects, proposals, and proprietary production processes

Research and development strategies including technological data

You will sign a non-disclosure agreement as a condition of employment. If you improperly use or disclose a trade secret or confidential business information, you may be subject to disciplinary or legal action, regardless of whether you received benefit from the release of this information. Termination from the Company is a possibility.



WORKPLACE VIOLENCE PREVENTION

UIC-HR-2-6-020 Rev 0

PURPOSE

The purpose of this policy is to state the Company's zero-tolerance for workplace violence, verbal and nonverbal threats, and related actions and to set forth guidelines for preventing, investigating, and addressing any acts or threats of violence by employees, former employees, and customers that might occur during business hours, on Company premises, or while an employee is engaged in company business.

ELIGIBILITY

This policy applies to all employees and visitors.

POLICY

The Company is committed to preventing workplace violence, verbal and nonverbal threats, and related actions. The Company seeks to make UIC a safe place to work and expects that all employees will treat each other with courtesy and respect.

At no time will the Company tolerate behavior that is physically harmful, threatening, intimidating, bullying or coercing in nature to any employee, customer, or member of the public.

UIC prohibited conduct includes, but is not limited to:

- Injuring another person physically;
- Engaging in behavior that creates a reasonable fear of injury or subjects others to extreme emotional distress (e.g. verbal and written statements, gestures, or expressions that communicate a direct or indirect threat of physical or emotional harm);
- Possessing or using a weapon or other dangerous or hazardous device or substance on UIC premises, in UIC vehicles, or while on UIC business unless expressly authorized in writing by the employee's General Manager.
- Damaging property or threatening to damage property.

Employees have a duty to immediately report any incidents in violation of this policy, including a threat, act of violence, or suspicious persons or activities. Reports should be made to the employee's direct supervisor or another member of management. In circumstances warranting immediate intervention by law enforcement personnel, employees should contact the local police department. The identity of a person who makes a report will be protected to the maximum extent possible. Employees are also encouraged to suggest ways to reduce or eliminate risks of workplace violence. Employees will not be retaliated against for making any report under this policy. The



Company will maintain records of such reports for the purpose of evaluating risks and improving safety.

An employee's own personal safety should be that employee's first concern during an act of violence in the workplace. Employees should not put their own safety at risk. Only trained professional should engage violent individuals.

The Company will promptly and completely investigate all reports of violent acts, threats of violence, possession of a weapon, and suspicious people and activities. Until a report has been investigated, the Company may suspend an employee either with or without pay, if such action is deemed necessary for safety reasons or to conduct the investigation.

Any employee found in violation of this policy is subject to immediate disciplinary action up to and including termination. UIC may seek the prosecution of any of those who engage in violence on its premises or against its employees while they are engaged in company business.

EXCEPTIONS

Exceptions require the approval of the subsidiary or Corporate Human Resources Director.

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	CEO/President	05/01/2011



NON-FRATERNIZATION

UIC-HR-2-6-054 Rev0

PURPOSE

The purpose of this policy is to state the position of the Company regarding fraternization on the premises of Company and customer worksites.

ELIGIBILITY

This policy applies to all employees.

POLICY

Fraternization for the purposes of this policy means to associate or socialize in an intimate way.

CUSTOMER RELATIONSHIPS

While many daily duties may involve contact with customers, employees are expected to conduct themselves in a professional and appropriate manner during these interactions. We expect our employees to be mature and reasonable, and to behave in a manner appropriate for the workplace.

SUPERVISOR RELATIONSHIPS

In order to provide an appropriate workplace and avoid workplace disruption, it is against Company policy to engage in a romantic or intimate personal relationship with any current employee over whom he/she has any supervisory authority, or where either employee may have a reasonable belief that such supervisory authority exists, whether expressly or by implication. This policy prohibits dating and sexual affairs between employees and those with real or perceived supervisory authority, but does not bar office social events or work-related meals and contact.

Supervisors and managers at all levels must refrain from encouraging or developing sexual or romantic relationships with employees who report to them, whether directly or indirectly. In the event such a relationship does develop, or appears as though it may develop, the supervisor or manager must report the matter to their manager or Human Resources. If the supervisor or manager does not report the relationship on a timely basis, the supervisor or manager may be demoted, transferred, or terminated. The Company will take appropriate action to resolve the matter. An appropriate and preferred remedy is to end the supervisory relationship.

Failure to comply with this fraternization policy may result in disciplinary action, up to and including termination.



EXCEPTIONS

Exceptions require the approval of the subsidiary or Corporate Human Resources Director.

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	CEO/President	04/01/2011



MEDIA RELATIONS

UIC-MKTG-2-6-001 Rev 1

PURPOSE

UIC has established the following Media Relations Policy in order to ensure clear and accurate communications with the public. The media can play an integral role in helping to establish a positive public perception of our company and our goal is to maintain open, effective, and positive communications.

For purposes of this policy, media shall refer to representatives of any media entity whatsoever, including without limitation newspapers, magazines, newsletters, online publications, television, and radio. In no way is this policy meant to restrict employee rights to protected concerted activity as defined by the National Labor Review Board or other protected activities such as Whistleblower actions, etc.

Scope - This policy applies to all UIC family of companies' programs and employees.

POLICY STATEMENT

Note: Any reference to the "Company" includes the entire UIC family of companies.

Employees shall refer all media requests to the Company's marketing representative, and their immediate supervisor.

Employees are prohibited from making statements as an official representative of the company to the media, unless they have been given explicit authority to do so by the President and CEO, or their company's Vice President of Operations or the UIC Sr. Director of Marketing and Communications.

The appropriate holding company communications representative should also be notified of any requests from the media for Company statements.

Response to Media Inquiry:

An immediate answer to a direct question from the media should be, "I will refer your request to our Company Spokesperson who will respond to you as soon as possible."



EXCEPTIONS

Exceptions to this policy are only permitted by the Marketing and Communications Dept.

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	S. Blue	CEO/President Anthony Edwardsen	06/07/2012
01	Updated Policy Media Relations	Mario Gamboa	CEO/President Anthony Edwardsen	07/14/2017



UIC ONLINE COMMUNICATIONS AND SOCIAL MEDIA POLICY UIC-MKTG-2-6-002 REV 2

PURPOSE

UIC's goal regarding social media is to create guidelines for employees when participating online in a respectful, relevant way that protects our reputation and is in accordance with federal and state laws and company policy. In order to protect UIC and its employees' privacy, employees should be cautious when joining or using social media on the internet. This policy establishes practical, reasonable and enforceable principles that shall be followed by employees when using social media.

Social media can include text, audio, video, images, podcasts and other multimedia communications.

In no way is this policy meant to restrict employee rights to protected concerted activity as defined by the National Labor Relations Board or other protected activities such as whistleblowing, etc.

SCOPE

UIC and its Family of Companies

POLICY STATEMENT

UIC, its subsidiaries, and employees shall not create or operate official social media pages/sites/accounts on behalf of the company or a subsidiary, or in the company's or a subsidiary's name, without express prior approval of the President and coordination from the Marketing and Communications department. If official social media presence is approved, all posts shall be reviewed and approved by the Marketing and Communications department.

It is the responsibility of UIC employees to protect confidential information. Failure to manage and protect confidential information correctly may result in legal or regulatory fines, damages to UIC's reputation and loss of productivity.

Social media is not the place to conduct confidential business with co-workers, customers, partners or suppliers. Social media will not be used for internal business communications among fellow employees.



Employees may not create any website, social media account, or URL to impersonate or represent UIC. A disclaimer mentioning that a social media or internet page is not an official UIC page does not waive or satisfy this policy requirement and shall not be used.

Other policies

Employees shall at all times respect all UIC policies, including the UIC Code of Business Ethics and Conduct, and the UIC Internet Usage Policy, when using social media.

Employees are prohibited from downloading/installing unapproved social media software onto the UIC network. Any software installation requires IT Departmental and managerial approval and a UIC IT Help Desk work request.

Any violation of this policy will be handled in accordance with the UIC Corrective Action Policy (UIC-HR-2-6-026).

EXCEPTIONS

No Exceptions

Revision	Change Description	Author / Revised By	Approved By	Effective Date
1	Original issue	Corp. Dir. Mktg. & Comm.	CEO/President Delbert Rexford SOF	2/11/2019
2	Updated for approved official social media presence and posts	Caroline Cayton	CEO/President Delbert Rexford SOF	9/8/2020



DRUGS & ALCOHOL ABUSE PREVENTION POLICY

UIC-HSET-2-5-304 Rev. 1

PURPOSE

The purpose of the Drugs & Alcohol Abuse Prevention policy is to ensure the safety, health, and well-being of UIC's and its family of companies' employees and all people who come in contact with its workplace(s) and property, and/or use its products and services. Recognizing that drug and alcohol abuse pose a direct and significant threat to this goal, and to the goal of a productive and efficient working environment in which all employees have an opportunity to reach their full potential, UIC is committed to assuring a drug-free working environment for all of its employees.

SCOPE

All Employees of UIC and their family of companies are subject to drug and alcohol testing as permitted by Federal and State law.

POLICY STATEMENT

UIC, in concert with the Board of Director's Alcohol and Drug Policy, strictly prohibits the illicit use, possession, sale, conveyance, distribution, or manufacture of illegal drugs, intoxicants, or controlled substances in any amount or in any manner. In addition, UIC prohibits the abuse of alcohol and prescription drugs.

Drug and Alcohol Testing

UIC asserts its legal right and prerogative to test any employee for substance abuse. Employees as requested may need to submit to a medical examination and / or to submit to urine, blood, saliva, breath, and / or hair testing for drugs or alcohol. Employee acceptance of medical examinations and testing, when requested by UIC, is a mandatory condition of employment.

The refusal to submit to such medical examinations and tests; will be considered by UIC to be equivalent to a confirmed "positive" test, which constitutes a violation of UIC policy and will be handled in accordance with the UIC Corrective Action Policy (UIC-HR-2-6-026).



Prohibited Conduct:

UIC strictly prohibits the use or possession of alcohol and drugs (except in instances in which the individual has current medical prescription for the drug) while operating UIC-owned equipment, while conducting official UIC business (for example, attending Board or Board Committee meetings or while performing duties during working hours), and whenever present on UIC-controlled premises.

Furthermore, UIC prohibits the use of UIC funds for the purchase of alcohol or drugs at any venue or in any setting. However, UIC does allow UIC employees, officers, and directors to use or possess alcohol (but not drugs, except for those instances in which the individual has a current medical prescription) in other venues or settings (such as at public functions or in public places), as long as UIC funds are not expended for the purchase of the alcohol. While use and possession of alcohol at these public venues and settings is permitted, abuse of alcohol is prohibited. Abuse of alcohol means imbibing alcohol to the extent that it impairs good judgment or leads to inappropriate conduct or behavior.

Conditions / Circumstances for Testing

- Pre-employment The testing of job applicants after extending an offer but prior to commencement of employment. All new hires - and re-hires of regular full-time or part-time employees - are required to submit to a preemployment drug test. Failure to pass this drug test shall result in denial of Employment.
- 2. Safety-sensitive positions Related to positions in which hazardous situations can occur due to employee conduct.
- 3. Security-sensitive positions Related to national security or relating to those employees with access to large amounts of cash or valuables, or carrying firearms.
- 4. Post-accident As part of an investigation of a bodily injury and / or property damage incident.
- 5. Follow up After a Non Work Related (NWR) return to work and/or during any rehabilitation process if employment is uninterrupted.
- 6. "Reasonable suspicion" Based on supervisor referral to HR which arise suddenly or problems which may arise progressively in the workplace; potentially based on such developments as excessive absenteeism, frequent accidents, observance of drug paraphernalia at an Employee's work station, erratic behavior, or declining performance.
- 7. Regulatory (to include DOT standards) and/or contractually required See contract
- 8. Periodic, announced As part of an annual physical
- 9. Random, unannounced all employees are on notice that they may be called



at any time - by a Neutral selection process - to be tested).

10. Sweep - A company or site wide collection in which all employees must participate. If an employee is on vacation or R&R, s/he may be subject to a collection as soon as practicable after returning to work and/or the job site.

Notification of Criminal Convictions

Any employee convicted of a violation of a criminal drug or alcohol statute; that is workplace-related must notify UIC in writing within one calendar day of the conviction. [This provision is required for most federal contractors and all recipients of federal grants under the Drug-Free Workplace Act of 1988.]

Searches

When UIC has any reason to believe that an employee is violating any aspect of this policy, employee may be asked by the Corporation to submit immediately to a search or inspection at any time (including during breaks and the lunch period) while on Corporate premises or on any client property.

Entry onto Corporate premises constitutes consent to searches and inspections. An employee's refusal to consent to a search or inspection when requested by UIC constitutes a violation of corporate policy and will be handled in accordance with the UIC Corrective Action Policy (UIC-HR-2-6-026). Authorization must be obtained from Human Resources prior to conducting an employee search or inspection.

Employee Assistance

UIC urges individuals with substance abuse problems to seek help, and the Corporation is committed to providing assistance in this regard. UIC considers drug addiction and alcoholism to be treatable diseases.

The goal of UIC's policy on Employee Drug and Alcohol Abuse is not only deterrence, it also is detection and treatment. UIC therefore makes available to all employees a confidential employee assistance program (EAP)(UIC-HR-1-5-001) with the ultimate goal of rehabilitation.

This program is available at no cost [or "low cost"] to employees ["and their dependents"], and includes initial assessment, referral, and counseling. The EAP includes family support, counseling, and re-enforcement, all of which can be critical to the successful rehabilitation of a substance abuser.



Any subsequent treatment after referral from the Corporate EAP program to an outside treatment provider may be covered under the employee's health care coverage. The costs of continuing or long-term rehabilitation services, whether or not covered by the employee's medical plan, are the ultimate responsibility of the employee.

General Responsibility and Applicability

Substance-abuse prevention is everyone's responsibility. UIC expects all of its employees to recognize and accept this responsibility, and to do their part in ensuring that, working together, we can achieve and maintain a drug-free working environment for all UIC employees. This policy applies equally to all UIC personnel, no matter what position or employment status.

Discipline

Any violation of this policy will be handled in accordance with the UIC Corrective Action Policy (UIC-HR-2-6-026) and may be referred for criminal prosecution.

EXCEPTIONS

Exceptions to this policy are only permitted by the President and CEO.

Applicable and Reference Documents

- 1. Substance Abuse & Mental Health Services Administration (SAMHSA) <u>SAMHSA - Substance Abuse and Mental Health Services Administration</u>
- 2. Division of Workplace Programs (DWP) Drug-Free Workplace Programs Drug-Free Workplace Programs | SAMHSA

Revision	Change Description	Author / Revised By	Approved By	Effective Date
1	Original issue	Corp. Sr. Director HSET Christopher J. Monetta	CEO/President Delbert J. Rexford SOF	7/26/2018



CHAIN OF COMMAND

UIC-HR-2-6-065 Rev0

Purpose

The purpose of this policy is to convey UIC's management structure, internal communication channels for employees, and protection for whistleblowers.

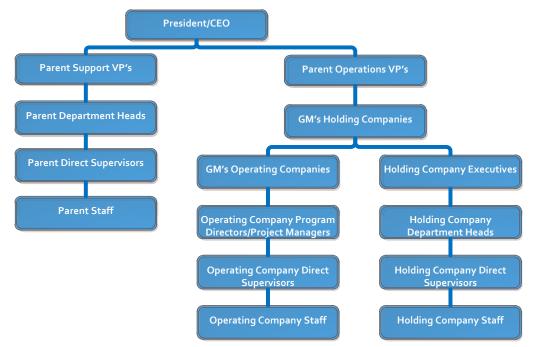
SCOPE

This policy applies to all UIC employees.

Policy

UIC's Management Structure:

UIC is organized into the parent (corporate) office, holding companies, operating companies, and departments within each of these units. The chain of command applies within each of these entities and rolls up through the organizational hierarchy. In most cases, the chain of command is the same as the reporting relationships up through the hierarchy. Below is an overview of UIC's chain of command:



Communication Channels:

In the normal course of business, UIC expects management to provide direction and guidance regarding work assignments and expectations through the management structure to employees. Likewise, employees are expected to flow most questions and concerns they might have regarding their work assignments and associated expectations through the same management structure, starting with their direct supervisors. Managers have a responsibility for evaluating and addressing such concerns or questions, or



escalating if they lack the authority to do so. Similarly, employees have the right to escalate or appeal issues or concerns up through the chain of command should they feel they have not been adequately or promptly addressed.

Not all communications are expected to go through the management structure. Employees are encouraged to use corporate services (payroll, benefits, etc.) directly, some projects and contracts involve "matrix" style organizational structures, and in emergency situations specially qualified personnel may take command. Great ideas, encouraging words, and hazard identification are best delivered to the individual who can take construction action. No policy can address every situation or replace good judgment. Understand and respect UIC's management structure, and always apply good judgment.

Perceived Ethical or Legal Violations:

UIC is committed to ethical conduct, and must be aware of issues to correct them: we rely on our employees to help us maintain this standard by reporting concerns. Such activity is often referred to as "whistleblowing" and the reporting employee a "whistleblower".

Should an employee come across a perceived violation of the law or UIC's Code of Business Ethics and Conduct, UIC expects the employee to communicate that concern immediately, which may or may not involve doing so through the management structure. If the concern is within the management structure, concerns may be raised to the next level manager. If the employee is not comfortable talking to anyone within the management structure, the employee may either contact HR or initiate a UIC Code of Business Ethics and Conduct concern.

You may report your UIC Code of Business Ethics and Conduct concern to our confidential and anonymous helpline (1-888-373-8855 or www.cleanumiaq.com) or the other channels specified in the UIC Code of Business Ethics and Conduct. The UIC Code of Business Ethics and Conduct states UIC takes this Code of Conduct very seriously and will not tolerate any retaliation against any person who reports, or participates in an inquiry, in good faith of a possible violation of the Code. UIC is committed to maintaining a culture and environment in which employees not only feel safe to ask questions and report concerns, but understand that UIC expects that they do so.

Whistleblower Protections for Federal Contractor Employees:

In addition to the UIC Code of Business Ethics and Conduct reporting procedures described above, UIC employees have a right to report suspected criminal violations, misconduct, wasteful activities, and allegations of civil rights or civil liberties abuse to the Office of the Inspector General (OIG) of the Department of Homeland Security at:

DHS OIG Hotline: DHSOIGHOTLINE@DHS.GOV, or, 1-800-323-8603

Further, federal law provides additional protections for certain individuals and activities. If you are discharged, demoted, or otherwise discriminated against for disclosing the following misconduct to a member of Congress, a representative of a committee of Congress, the Department of Defense (DoD) Inspector General, the Government Accountability Office, the Department of Justice, or a federal government contracting officer, you have a right to file a complaint with the DoD Inspector General for the following:



- 1. Gross mismanagement of a Department of Defense (DOD) contract.
- 2. Gross waste of Department of Defense (DOD) funds.
- 3. A substantial and specific danger to public health or safety.
- 4. A violation of law related to a DOD contract (including the competition for or negotiation of a contract). (74 FR 2410)

Scenario Examples

The following examples are intended to give you an idea of how to apply this policy in daily operations. If you ever have doubt about how to address a matter, talk to your supervisor or Human Resources.

Matter	Action
You have concerns about a co- worker's poor work performance.	Bring to the attention of your immediate supervisor.
You want to work on a project being led by the manager of another department.	Contact your supervisor and express your interest and obtain approval, then talk to the project manager.
Your supervisor has continued to make comments that make you uncomfortable after you have expressed your discomfort to her.	Contact your HR department or your supervisor's boss, or file an anonymous UIC Code of Business Ethics and Conduct concern.
You work in Finance, and have come up with a great idea for reducing costs in Engineering.	Talk to your boss or contact the Engineering Manager directly. If you do the latter, best to give your boss a heads up.
Your coworker is slurring his speech and smells of beer.	Contact your supervisor, her supervisor, or HR as soon as possible. If none of these are available, contact Safety or any supervisor. Reference UIC's Drug & Alcohol policy for additional information.
Your supervisor has included costs in a billing for a DoD contract that you had identified as non-billable, orders you to stop voicing your concern, and threatens retaliation if you raise it again.	Contact your supervisor's boss, HR, or both OR file an anonymous UIC Code of Business Ethics and Conduct concern if you are uncomfortable doing so. You also may file complaint with the DoD Inspector General.
You want an exception to the PTO policy to allow you to cash out part of your leave bank to pay for unexpected expenses.	Make the request through your supervisor. If you wish, you may appeal through the chain of command.
You have a question about your benefits after reading the benefits information on the Employee Portal.	Contact your HR department or the benefits vendor.



Revision History

Rev #	Description of Revision	Revised by	Approved by	Effective Date
01	Original Issuance	UIC HR	CEO/President	10/23/2012



EMPLOYMENT CLASSIFICATION

UIC-HR-2-6-032 Rev 2

PURPOSE

The purpose of this policy is to provide the definitions of employment categories at UIC based upon the level of work, number of normally scheduled work hours, or anticipated length of service.

SCOPE

This policy applies to UIC, it's holding companies and subsidiaries.

POLICY STATEMENT

Employees are classified in an employment category based upon the level of work (exempt or non-exempt), the number of normally scheduled work hours (full time or part time), or anticipated length of service (temporary). The Company notifies prospective employees in their offer letter regarding their employment category and advises existing employees in writing when there is a change in employment category. Prior approval of Human Resources is required before changing the employment category of any employee. This Policy is administered in compliance with all applicable Federal, State, and local laws, regulations, and codes.

NON-EXEMPT/EXEMPT – TERMS, DEFINITIONS, AND/OR CONDITIONS

Non-Exempt

Non-exempt employees perform work that is covered by the Fair Labor Standards Act (FLSA) and are paid on an hourly basis. Non-exempt employees receive overtime pay for hours worked in excess of Federal or State wage and hour laws.

Exempt

Exempt employees perform work that is not covered by the Fair Labor Standards Act (FLSA), i.e., they are salaried employees and not subject to wage and hour regulations. Exempt employees are not paid overtime for hours worked in excess of 40 per workweek or 8 hours a day. Although salaries are often quoted in weekly, bi-weekly or annual terms, those terms are not to be construed as a contract for any period of time.

Any questions concerning the exempt status of an employee should be referred to Human Resources.



<u>CATEGORIES OF EMPLOYMENT – TERMS, DEFINITIONS, AND/OR</u> CONDITIONS

Full Time Employee

Regular full-time employees typically work a regularly scheduled workweek consisting of five (5) eight (8) hour days, or forty (40) hours per workweek, for an indefinite period. However, employees who are normally scheduled to work thirty-two (32) or more hours per week are also considered as full time.

Regular Part Time Employee

Regular part time employees have a set schedule working less than thirty-two (32) hours per week.

Temporary Employee

This does not include individuals from a temporary agency, as they are not employees of the Company. Temporary employees can be exempt or nonexempt to fill a specific need or perform a specific task for a limited period, <u>not to exceed</u> <u>ninety (90) days</u>. Once the employee exceeds ninety (90) days, the employee should then be classified as a Regular Part Time or Full Time Employee.

Part Time On-Call Employee

An employee who is **part**-time on-call has no regular work schedule, is paid on an hourly basis, and is <u>regularly</u> subject to call-in by the Company for work on an as-required basis used for normal backfills, surge requirements, and weekly or bi-weekly projects.

Part Time Casual Employee

An employee who is part-time casual is paid on an hourly basis and is subject to call-in by the Company for work on specific projects. Part-time casual employees may go months at a time without being called in and are not to exceed 750 hours in a 12 month period. This employee is generally a highly paid individual and is considered a subject matter expert in his/her industry.

Regular Employee: 32-39 Hour

Employees who typically work a regularly scheduled workweek consisting of 32-39 hours per workweek, for an indefinite period. In most cases employees in this classification work a regularly scheduled workweek consisting of four (4) eight (8) hour days, or thirty-two (32) hours per workweek.

Skilled Trade Employee

Skilled Trade Employees can be full-time or part-time, non-exempt employees working in the field or on a rotational schedule in which work is expected to be performed for a period greater than 90 days.



Active Employee

Hiring managers are allowed to keep employees active within UIC and its family of companies when the employee does not have recorded work hours in the past 30 days, but is scheduled to come back to work once work assignments are available.

- Full Time Employees that have not worked in 30 days, will be classified as Regular Part Time Employees, pending the discussion between HR and the supervisor.
- Returning employees who have not worked for more than 30 days may be subject to required testing such as a drug substance test, complete required job-related safety training, and applicable additional training.

EXCEPTIONS

Exceptions require the approval of the Holding Company Human Resources Director or Corporate Human Resources Director.

Revision	Change Description	Author / Revised By	Approved By	Effective Date
0	Original issue	UIC HR	CEO/President Anthony Edwardsen	04/17/2013
1	Updated Categories of Employment	Senior HR Director Jennifer Reichelt	CEO/President Delbert Rexford SOF	10/23/2018
2	Updated categories of employment	HR Manager Selma Khan	CEO/President Delbert Rexford SOF	12/17/2019



JOB ROLE AND RESPONSIBILITY

JOB ROLE AND RESPONSIBILITY

Job descriptions are prepared and include position purpose, description of key roles and responsibilities, essential functions of the job, required licenses or certifications, reporting relationships, employment classification (e.g., exempt or non-exempt status), and other information. You will receive a copy of the job description. The Company may make changes to your role and responsibilities based on business needs.

We reserve the right to transfer you to another position as a result of business needs. This type of reclassification is a lateral move and generally encompasses roles and responsibilities of similar complexity at the same salary level.

PROMOTION

A promotion may occur when we determine that the roles and responsibilities of a job are materially changed in scope, difficulty, and responsibility. We seek to promote within the organization when employees demonstrate strong performance delivery and capabilities and qualifications to perform at a higher level in the business. Promotions are a way for the Company to recognize employee contribution and provide opportunity for further development and growth.

DEMOTION

Under certain circumstances and at the Company's direction, an employee may be reclassified to a position that is lower-rated, and as a result their compensation will be decreased. A demotion may be a result of organizational change or a determination that an employee does not have the skills or capabilities to function and deliver at their current level. A change in compensation is effective at the beginning of the pay period following the change.



SEPARATION FROM EMPLOYMENT

UIC-HR-2-6-068 REV 1

PURPOSE

The purpose of this policy is to state the company's process for employment separations, so they are conducted in a manner that protects the company's interests, complies with federal, state, local laws and regulations.

SCOPE

Ukpeaġvik Iñupiat Corporation's (UIC) its Holding Companies and Subsidiaries

POLICY STATEMENT

It is Ukpeaġvik Iñupiat Corporation's (UIC) policy to terminate the employment relationship with employees as business needs require, as employees resign, as contracts terminate, and as employees' performance and behaviors warrant.

Authorized personnel are to conduct terminations in full compliance with federal, state, and local laws, as well with other corporate policies and procedures pertaining to terminations. The authorized personnel must consult with Human Resources prior to conducting any involuntary termination.

All employees are employed at the will of Company for an indefinite period. Employees are subject to termination at any time, for any reason, with or without cause or notice. Likewise, employees may leave their employment at any time and for any reason. No representative of the Company is authorized to modify the At-Will Policy for any employee or to enter into any agreement, verbal or written, contrary to this Policy other than written explicit authorization from the President/CEO.

Any statements contained in this Employee Handbook or any other employee handbook, employment applications, recruiting materials, memoranda, or other materials provided to applicants and employees in connection with their employment cannot modify At-Will employment. None of these documents, whether individually or combined, cannot create an expressed or implied contract of employment for a definite period, or an expressed or implied contract concerning any terms or conditions of employment.

It is company policy to remove access to company facilities, systems, equipment, and other resources upon or before the day of termination to protect the interests of the corporation and our customers.



Employment separations fall under two types: voluntary and involuntary. The employee initiates voluntary termination of employment. An involuntary termination of employment is one that is initiated by the Company.

Discharge without cause can occur when the company decides that the services of an employee are no longer needed. In general, this does not refer to an employee's conduct. Reasons for discharge without cause may be layoffs, rearrangement of a department or redefining of a position.

Resignation

A resignation is a voluntary act initiated by the employee to end employment with UIC. UIC asks that employees consider the needs of the company and customers and, wherever possible, provide two (2) weeks written notice before the date of resignation, stating specific reason(s) for the resignation. Although, not required, if an employee does not give a 2 weeks' notice, the employee may not be eligible for rehire. If an employee gives their resignation verbally, the supervisor should request it in writing. However, a verbal resignation is as binding as a written resignation and will be treated as an official resignation even if it is not received in writing.

Termination for Cause

A termination for cause is an involuntary dismissal initiated by the Company because of repeated or egregious violations of Company policies. For specific information, refer to the UIC Corrective Action Policy UIC-HR-2-6-026.

Reduction in Force/Layoff

A separation may occur as the result of a reduction in workforce (RIF) changes in duties, organizational changes, lack of funds, work, or lost of contract, and contract modification. The Company will make its best efforts to provide two weeks' notice, but is not required to do so.

Termination Date

The employee's termination date will be the last day at work on which the employee actively performed services for UIC or the date the employee notified the supervisor of the employee's resignation, whichever is later (the difference can occur when an employee working an irregular schedule or on leave provides notice of resignation after the last day worked). After notice of resignation, paid leave may not be used unless expressly approved in writing by management.

Company-Paid Expenses

The Accounting Department and Human Resources will jointly determine if the separating employee owes the company any money for advance vacation, tuition,



training, benefit premiums, or for any other reason. Should there be monies owed that the Company could not fully recover, the Company and the employee will discuss an alternative repayment arrangement that will be formally agreed upon.

Employee Checkout

Terminating employees must check out with the manager to return Company/ Customer-issued property (keys, materials, car phones, access badges, building passes, parking permits, Company ID's, etc.). Customer/Company proprietary/private data must also be returned. The manager will collect a final timesheet and any expense reports.

Security Checkout

Terminating employees who hold an active security clearance must complete the proper debriefing paperwork provided by the Company Facility Security Officer prior to departure.

Eligibility for Rehire

Former employees who leave UIC in good standing will be classified as eligible for rehire, and considered for re-employment. In "good standing" means the employee was not issued any corrective action within the last 12 months of his/her employment with the Company. In such cases, the individual is subject to the same hiring process and policies as other candidates.

EXCEPTIONS

The subsidiary or Corporate Human Resources Director must approve exceptions.

Revision	Change Description	Author / Revised By	Approved By	Effective Date
1	Original issue	Sr. HR Director Jennifer Reichelt	CEO/President Delbert Rexford	7/3/2018



RECRUITMENT & HIRING

UIC-HR-2-6-088 Rev 2

PURPOSE

The purpose of this policy is to define UIC's process for recruitments and hiring.

ELIGIBILITY

This policy applies to all UIC companies.

POLICY

The Company recruits and hires well-qualified individuals in accordance with our staffing requirements, Company values, and applicable federal, state, and local laws and regulations.

JOB VACANCY ANNOUNCEMENTS (JVAS)

A JVA is required for **all vacancies**, including:

Positions created with substantially different and higher levels of responsibilities than those held by incumbents (e.g., creation of a management level job to handle broader and higher level responsibilities previously performed by administrator level jobs);

For work within federal government services, positions created as the result of a contract award, to include when there are incumbent staff of the predecessor employer likely to fill the new positions and an obligation to offer first right of refusal to incumbent staff; and

Positions in all classifications of employment (full-time, part-time, temporary) whether it is a new position or a replacement.

A JVA is not required for:

Existing positions that have jobs with revised scope of responsibilities as the result of a reorganization (e.g., the re-assignment of a department within a functional area from one job to another);

Existing positions for which there has been a reclassification of the associated job to a higher level but with a similar scope of responsibilities (e.g. from an Administrator to Sr. Administrator); or

Activating an employee on an on-call status

All JVAs are posted to the Company website through the applicant tracking system, state employment agencies* where the work will be performed in accordance with State Law and as needed to external job posting websites, for a minimum of three (3) days, or until filled. This applies to all classifications of employment (full-time, part-time, temporary, etc.) whether new or replacement.



*Exceptions for State Employment Agencies:

The position is expected to be filled internally

The position is expected to last three (3) days or less (e.g., temporary employees for an event)

The position is management or executive level

The Hiring Manager's (HM) approval is required on the JVA, as well as an authorized Human Resources (HR) representative for the organization (holding company HR for operating and holding companies, corporate HR for corporate positions).

Indirect positions at the holding companies also require the approval of the respective General Manager (GM) for the holding company.

Holding companies and executive management may require additional approval requirements for indirect and direct positions beyond these minimum requirements – check with your supervisor or HR department.

All approved JVAs are kept in a central file managed by HR for a minimum of two (2) years.

RECRUITMENT & APPLICATIONS TO JVA'S

To ensure compliance with all applicable laws and regulations, HR is responsible for all phases of recruitment including establishing methods of recruitment and coordinating the recruitment process. Recruitment begins when HR receives an approved JVA. Good Faith Efforts are made during the hiring process to attract a diverse pool of qualified minority/women/veterans/disabled applicants.

The company requires all parties to apply to the vacancy to be considered for the job. In the vast majority of cases, candidates will be required to apply online, with two limited exceptions:

In the event that a candidate lacks access to the online system or is otherwise unable to apply online, the holding company HR may authorize the use of a paper application.

In the event of a mass hiring of an incumbent workforce, the Corporate VP of HR may authorize the use of an alternate method for collecting applicant data and confirming applicant status.

The employment application solicits demographic information (gender, race and ethnicity) from the candidates through a voluntary self-reporting or self-identification method in accordance with Federal regulations. The voluntary gender, race and ethnicity information obtained from candidates is retained separately from the candidate's resume/application and is not shared with hiring managers. Employment applications and resumes are kept in the applicant tracking system for a minimum of two (2) years from the date the position is filled (based on date of hire) as required by the Office of Federal Contractor Compliance Programs (OFCCP).



CONTACTING CANDIDATES

Recruiters should make at least two (2) attempts to reach suitable candidates by using the phone number(s) and/or email address from the candidate's application. If the attempts are unsuccessful, the candidate is "self-withdrawing" from the hiring process.

DEFINITION OF AN APPLICANT

A candidate becomes an applicant when the individual has met the following criteria: Submits an expression of interest by completing an employment application for a specific position through the Company's web-based recruiting and applicant tracking system or through one of the alternate methods referenced above;

The Company considers the individual for employment for a specific position in which they applied;

The individual submitting the application possesses the basic qualifications for the position; and

The individual continues to show interest throughout the selection process.

UNSOLICITED RESUMES

Individuals who submit resumes to UIC that are not associated with an application to a JVA will not be considered as candidates until which time they meet the above criteria. When feasible, individuals submitting unsolicited resumes will be advised to assess open positions and to submit an application to any they wish to pursue.

EXTERNAL RECRUITMENT

External recruiting sources may include resume databases, newspaper and journal advertising, veteran transition programs, job fairs, community organizations, educational institutions, employee referrals, and websites. All external recruitment activities must be approved by and coordinated with the HR department at the holding company for operating and holding company recruitments, and at corporate for corporate recruitments. Because UIC has government contracting business, all UIC companies are required to comply with recordkeeping requirements for internal and external database searches, as well as other OFCCP enforced regulations.

Maintaining Record Searches – Internal and External

The Internet Applicant rule requires contractors to maintain any and all expressions of interest through the Internet or related electronic data technologies as to which the contractor considered the individual for a particular position.

HR is to maintain records identifying job seekers contacted regarding their interest in a particular position. In addition, for **internal resume databases**, the contractor must maintain a record of each resume added to the database, a record of the date each resume was added to the database, the position for which each search of the database was made, and corresponding to each search, the substantive search criteria used and the date of the search.



For **external resume databases**, the contractor must maintain a record of the position for which each search of the database was made, and corresponding to each search, the substantive search criteria used, the date of the search and the resumes of any job seekers who met the basic qualifications for the particular position who are considered by the contractor.

These records must be maintained regardless of whether the individual qualifies as an "Internet Applicant" under 41 CFR 60-1.3.

CURRENT EMPLOYEE APPLICANTS

UIC provides preference to current employees in good standing as part of its Employment Preference policy. HR will assess current employee applicants to determine if they meet the minimum qualifications for the position in which they applied and are in good standing such to apply the terms of the Employment Preference policy.

FORMER EMPLOYEES

Former employees are considered on the same basis as all other applicants, provided that they are eligible for rehire.

RELATIVES

No immediate family members shall be in the same reporting structure. See the Employment of Relatives policy (UIC-HR-2-6-006 Rev0).

INDIVIDUALS WITH DISABILITIES

UIC offers to help to individuals with disabilities to complete the application process. Contact information is provided on our online application site, and all HR staff at the holding companies and corporate are charged with providing such assistance. UIC also will make determinations on requests for reasonable accommodations by individuals with disabilities seeking employment on a case-by-case basis.

MINORS

The employment of minors will be in compliance with Federal, State and contractual requirements. Hiring Managers must contact HR prior to hiring a minor as state regulations vary.

CRIMINAL RECORDS

Applicants with criminal records will not be automatically disqualified from consideration. Nor will information regarding criminal convictions be actively solicited as part of the initial application process, unless required by the nature of the position or by law. Such information may be collected at a later stage in the selection process. Whether and to what extent it may be a factor in the selection process will depend on the nature of the position, the nature of the conviction, and when the conviction occurred.

EMPLOYMENT ELIGIBILITY VERIFICATION

Employers must complete Form I-9 to document verification of the identity and employment authorization of each new employee (both citizen and non-citizen) within



three (3) business days of the date employment begins, or at the time employment begins for individuals hired for less than three (3) business days. See the UIC Immigration Law Compliance and Sponsorship of Visas (UIC-HR-2-6-009 Rev0).

CURRENT CUSTOMER/SUBCONTRACTOR EMPLOYEES

If a customer or subcontractor employee submits an online application, they will be considered on the same basis as all other applicants, unless the contract prohibits.

EMPLOYMENT AGENCIES

Employment Agency contacts must be coordinated through HR to ensure an agreement is on file, and to ensure the agency is aware that we are a government contractor that is committed to EEO/AAP principles. All vendor agreements include verbiage notifying them of their obligation to comply with OFCCP as per FAR to include any other applicable flow down clauses from the contract.

APPLICANT TRACKING SYSTEM (ATS)

HR is responsible for documenting the recruiting and hiring process in the online ATS for all recruitments and applicants, to include the following:

JVAs

Employment applications and resumes

A candidate review and/or disposition that provides the information as to he/she was or was not selected for the position

Equal Employment Opportunity (EEO) data for all applicants who reported voluntary self-identification

Human Resources ensures the documentation of all job applicants, as defined above, is maintained in compliance with the Office of Federal Contract Compliance Programs (OFCCP) requirements. Records (resumes and employment applications) are kept for persons who were applicants at any stage of the hiring process.

Note that there are no exceptions. If applicant data was collected via one of the alternate methods identified above, HR is responsible for ensuring the data is entered into the ATS.

SELECTION

The Company selects well-qualified individuals in accordance with company policy as well as state and federal law.

HR performs an initial review of all applicants and sends recommended applicants to the HM. Typically, only candidates meeting the minimum qualifications for the position will be forwarded. In some circumstances, preferred status applicants who fell short of the minimum qualifications may be allowed to participate in the selection process to gain experience, but will not be considered for a position for which they did not meet the minimum qualifications. HR may select a subset of the qualified candidate pool based on the size of the pool, the quality of applicants in the pool, and the HM's preferences for the number of recommended applicants to consider. The HM is responsible for reviewing



each candidate and providing feedback. HR uses the feedback from the HM to disposition candidates or to progress them through the selection process.

Interviews of qualified candidates must occur and be documented prior to extending an offer of employment for a JVA.

Employment offers will not be made during an interview, and under no circumstances can an interviewer guarantee the candidate anything regarding employment, training, job title, salary increases, or promotional opportunities.

OFFERS OF EMPLOYMENT

All offers of employment may be contingent upon the successful passing of a preemployment drug screen (See UIC Non-DOT Drug & Alcohol Testing Program, Version 1.5, page 7) and must be included in the offer letter along with additional, applicable contingencies.

Additional contingencies may include (but are not limited to); education and driver's license verification, contract award, security clearance, reference and background checks.

Results from all pre-employment testing and contingences must be reviewed and approved by HR.

UICTS: The HM must submit an approved "Offer Worksheet" to HR*. HR is responsible for drafting and signing the offer letter that contains the conditions of employment, contingencies and notifying the applicant.

*Prior to submitting an approved "Offer Worksheet" to HR, the following must be completed:

An approved JVA for the position Completed online employment application All other candidates (in the ATS) for the job must be dispositioned Employment offer approval

At times, it may be desirable extend a contingent offer based on the awarding of a contract or availability of certain work. A contingent offer is the company's intent to hire an individual upon the terms and conditions specified in the offer letter. The offer does not constitute an employment relationship; it establishes that the candidate is available as a resource to the Company and that the privileges of employment may be available to the candidate if the situation occurs.

DECLINED OFFER OF EMPLOYMENT

HR is responsible for documenting a declined offer in the ATS and working with the HM to select the next well-qualified applicant.



APPLICANTS NOT SELECTED / DISPOSITION

HR is responsible for applying a disposition to all applicants not awarded a position in the ATS.

Pursuant to UIC's Employment Preference Policy, most unsuccessful referred class applicants will receive additional contact from HR, Shareholder Development, or the HM to receive feedback and coaching.

Upon the acceptance of an employment offer and the successful passing of preemployment contingencies and references, HR will initiate the on-boarding process.

EXCEPTIONS

Exceptions to the Hiring Policy require approval of UIC's VP HR.

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	CEO/President	11/13/2012
01	General Revisions	UIC HR	CEO/President	04/25/2013
02	General Clarifying Revisions, Addition of Application Options, Addition of Individuals with Disabilities Provisions, Addition of Criminal Record Provisions	UIC HR	CEO/President	11/14/2013



BACKGROUND INVESTIGATIONS

UIC-HR-2-6-012 Rev0

PURPOSE

The purpose of this policy is to ensure that accurate background information is provided by prospective employees and, in some cases, current employees.

ELIGIBILITY

This policy applies to all employees and prospective employees.

POLICY

The Company will determine whether a background check is required based on the type of position, business necessity, and/or legal or contractual requirements. When a background check is required, applicants or employees must authorize their approval to proceed with the background check. The Company uses a third party agency to conduct the reviews. The type of information that can be collected includes, but is not limited to, past employment, education, character, finances, reputation, and criminal history. This process is conducted to verify the accuracy of the information provided.

In certain circumstances, the Company, government representatives, or contracting officers may require that individuals submit to additional background investigation. When a program requirement or co-location with a government customer necessitates an additional background investigation, applicants must comply with the additional investigation request as a condition of application for employment.

Although disqualification from a particular position is possible, as a result of federal and/or state laws, negative information does not automatically disqualify an applicant from consideration for employment. Applicants may still be eligible for employment depending on a variety of factors such as the nature of the position or the nature of the negative information.

Applicants will be given an opportunity to review results of the background investigation and have 10 calendar days to dispute the accuracy of the information or provide an explanation if the background check results in disqualifying information. If the individual is already a UIC employee, he/she will be placed on leave for the ten calendar-day period. If an individual provides information that demonstrates that the investigation information is inaccurate, the Company will re-evaluate the application. Otherwise, the application will be rejected and employment will be terminated.

Individuals found to have withheld or falsified any information regarding their past employment, education, character, finances, reputation, criminal history, etc. will be disqualified from potential employment or may be terminated. The Company reserves the right to make exceptions to this policy when necessary by business practice or contractual obligations.



EXCEPTIONS

Exceptions require the approval of the subsidiary or Corporate Human Resources Director.

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	CEO/President	03/15/2011



EMPLOYMENT PRACTICES, COMPLIANCE, HIRING

COMPLIANCE AND UIC CODE OF BUSINESS ETHICS AND CONDUCT

The Company administers employment practices in accordance with established state and federal laws, labor standards, government contracting standards, and the Company's policies including UIC Code of Business Ethics and Conduct. To report a UIC Code of Business Ethics and Conduct and Conduct concern please visit https://hr.uicalaska.com

NEW EMPLOYEE ORIENTATION

You should attend an orientation session within five to seven days after your first day of work. You will be briefed about the Company, our commitment to safety, Company policies, benefit enrollment, time reporting, and payroll information. Various legally required documents (e.g., proof of work eligibility I-9 form) must be completed within legal timeframe constraints. You should also complete necessary payroll and benefit applications. You will acknowledge various policies and procedures by signing various documents. Your supervisor, or their delegate, will ensure you are acquainted with your working facility, introduce you to co-workers, and discuss your work accountabilities. Your supervisor will also introduce you to time-reporting requirements, financial cost coding, and specific procedures applicable to your position.



EMPLOYMENT OF RELATIVES

UIC-HR-2-6-006 Rev 0

PURPOSE

The purpose of this policy is to define the circumstances under which UIC will employ members of the same family.

ELIGIBILITY

This policy applies to all employees.

POLICY

It is the policy of UIC to hire the best-qualified employees available for all jobs. However, it is necessary to ensure that, when at all possible, relatives are not placed in positions where their relationships adversely affect, or appear to affect, the objectivity, judgment, effectiveness, or morale of employees performing company business, or that place a supervisory individual in the position of deciding promotion, bonus, disciplinary or other actions concerning a relative.

Therefore, without approval from the General Manager, no immediate family member may directly supervise another immediate family member or an immediate family member's supervisor.

Definition of immediate family (only for the purpose of defining Employment of Relatives) includes the spouse, child, parent, brother, sister, stepparents and step children, grandparents and grandchildren, and/or those with a significant personal relationship (including fiancée, cohabitation partner, etc.,) of a current employee.

If employees become related after employment, (e.g. by marrying), one employee may be transferred out of the reporting chain. Wherever possible, the decision of which employee transfers will be left to the decision of the affected individuals.

EXCEPTIONS

This policy may be waived by the General Manager or President if necessary to meet Indian or shareholder preference objectives or when the affected employees sign an acknowledgement agreement consenting to such a working arrangement with an immediate family member and if the General Manager or President finds no substantial conflict of interest concerns that adversely affect the corporation.

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	CEO/President	04/01/2011



IMMIGRATION LAW COMPLIANCE AND SPONSORSHIP OF VISAS

UIC-HR-2-6-009 Rev 0

PURPOSE

The purpose of this policy is to state the Company's compliance with the Immigration Reform and Control Act and to define the circumstances under which the Company will sponsor employee visas.

ELIGIBILITY

This policy applies to all employees.

POLICY

Immigration Law Compliance

UIC is compliant with the Immigration Reform and Control Act of I986 and is committed to employing only people who are United States citizens, or who are aliens legally authorized to work in the United States. The Company does not discriminate because of a person's citizenship or national origin. Every new employee is required to complete the Employment Eligibility Verification Form I-9 and provide documents that prove identify and employment eligibility.

Company Sponsorship of Visas

Visas allow persons from other countries to enter the United States for a variety of reasons, including employment in the United States. The United States Customs and Immigration Services (USCIS) is the governmental body that oversees the issuing and enforcement of visas.

Where it is prudent to do so, the Company may sponsor a noncitizen by petitioning the USCIS for a visa that will permit the noncitizen to work for the Company.

In accordance with the USCIS requirements, the Company's sponsorship will include the Company paying the USCIS processing fee on the condition that if the noncitizen is granted an appropriate visa, the noncitizen agrees to remain employed with the Company for the term of the visa, usually three (3) years. Payment for the noncitizen's legal or representative fees and any other cost associated with the USCIS visa petition shall be the responsibility of the noncitizen.

Further, the noncitizen must agree to reimburse the Company, on a prorated basis, for the USCIS processing fee paid by the Company on behalf of the noncitizen if the noncitizen voluntarily quits or is terminated for cause during the term of the visa. This agreement is documented in the "Agreement to Reimburse Company Paid USCIS Processing Fees", which the noncitizen will be required to sign prior to the Company paying the USCIS processing fee. If the USCIS does not approve the visa petition, then the noncitizen is not responsible to reimburse the Company.



Any offer of employment to a noncitizen must be approved by the Company

EXCEPTIONS

Exceptions require the approval of the General Manager and the subsidiary Human Resources Director. For Corporate employees, approval by the President and Corporate Human Resources Director is required.

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	CEO/President	04/01/2011



PERSONNEL AND MEDICAL RECORDS

UIC-HR-2-6-051 Rev 0

PURPOSE

The purpose of this policy is to define the contents of employee personnel files and records and the rules regarding access to and modification of the records by employees and supervisors.

ELIGIBILITY

This policy applies to all employees.

POLICY

The Company maintains personnel records for employees at local HR offices. The Company utilizes reasonable measures to protect against unauthorized access to, or use of, personal information contained in those records, including secure record storage and password protected files. Records are protected at collection, maintenance, and disposal. Information contained in employment records and personnel files is consistently maintained in accordance with current personnel practices and applicable federal and state laws.

Personnel files include: job applications, related employment documents, training records, performance documents, salary documents, authorizations and consents, coaching and disciplinary reports and other employment records, at the discretion of the Company. Further, an employee may request that a record be placed in his or her personnel file such as a commendation or other record of achievement, so long as it is related to job qualifications or performance.

Personnel files do not include any separate files that may be maintained by the Company for purposes of investigation, tracking, or resolution of specific personnel matters. An employee will not be permitted to inspect such files.

Job-related medical information, I-9 forms, investigative files, and EEO self-identification forms are maintained in separate locked and secure files. Security clearance files are maintained by the appropriate authority.

Employees should notify HR of any change in status, such as telephone number, address, emergency contact information, tax exemptions, marital status, dependents' information, educational accomplishments, insurance beneficiary changes, name changes, or any other change that affects their personnel records.

To insure employee files are complete, supervisors should send all personnel documents, including letters of achievement/accomplishments as well as letters of coaching, warning, or discipline that have been issued to the employee, to Human Resources for filing within the employee's personnel file.



These records are confidential. No employee of the Company, including a supervisor, is permitted to access the records of another employee without having a legitimate business reason for doing so. A legitimate business reason means the employee or supervisor needs to review the record in order to fulfill his or her professional responsibility to the Company. A supervisor cannot review employee medical and insurance files or the employee's security clearance file.

Employees may inspect their personnel files and make copies of information, under reasonable rules during regular business hours. The employee may not mark up, change, or in any way alter the information maintained in his or her personnel or medical files. If the employee believes information within the file is in error, the employee must submit a request in writing to Human Resources. If the request is granted, Human Resources will make the change, and the employee will be provided with a copy of the applicable document(s) upon request. If a request for a change is denied, the employee may submit a Statement of Disagreement which will be maintained within the file for as long as the disputed record is maintained by the Company.

The following data should not be kept in personnel files:

Correspondence or records relating to the employee's personal financial affairs unless it can be demonstrated to be relevant to the employee's qualifications for a particular job (e.g., financial officer, accountant). This includes "dunning" letters and notices of garnishments.

Medical information.

I-9 Forms and Affirmative Action Record Forms. These are to be maintained in separate files.

EXCEPTIONS

There are no exceptions to this policy.

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	CEO/President	05/11/2011



WORK SCHEDULES AND TIMEKEEPING

UIC-HR-2-6-030 Rev. 1

PURPOSE

The purpose of this policy is to define the Company's standard workweek and approved exceptions.

SCOPE

This policy applies to all employees.

POLICY STATEMENT

The standard workweek will be defined during the Employee's first week of employment. Except as otherwise setout herein, each workday commences at 12:01AM and ends at midnight on the same calendar day. The Supervisor must communicate any deviations from this standard workweek for non-exempt employees to Human Resources for review and approval.

Standard Work Schedule

Unless otherwise posted or assigned, the regular workweek consists of five calendar days, eight (8) hours each day, totaling forty hours (40). The Supervisor establishes approved work schedules on the first day of employment.

A regular day of work consists of a nine-hour period with one hour for lunch or an eight and-one-half-hour period with one-half-hour for lunch. Scheduled lunch breaks occur between 11:00AM and 2:00PM.

Non-exempt employees may not perform work duties during the lunch break. An unpaid lunch break is legitimate when the non-exempt employee is fully relieved of all duties and the break lasts at least 20 minutes.

Any changes to the standard work schedule are subject to the approval of the employee's Supervisor and Human Resources. In the event there are specific federal, state, or local regulations, these will take precedence over these guidelines.

Non-Standard Work Schedule

Exceptions to the regular workweek, including shift workweek schedules, will be made when business practices or contractual needs require the change by the Supervisor, and will be in accordance with federal, state, or local regulations.



Customer Accommodation

Employees assigned to work at customer offices are expected to comply with the customer's needs and to schedule time to accommodate the customer's requirements. For the same reason, Supervisors may limit the availability of non-standard work schedules and/or the core work hours for employees assigned to a particular contract.

Compressed Work Schedule

A Compressed Work Schedule (CWS) is a schedule where an employee works a variation of the standard work schedule. As an example, an employee who works 40 hours in less than five days within the workweek. The Company recognizes that under certain conditions, primarily to meet the needs of the customer or the special needs of an employee, it may be necessary to implement a CWS. Implementation is on a case-by-case basis, and will be in accordance with this policy and federal, state, or local regulations and laws. The CWS may be discontinued if at any time the customer and/or the Manager determine(s) that the customer's or Company's requirements are not being satisfied using the CWS.

Special Work Assignments, Extended Workweek

Customer requirements may necessitate temporary special assignments of exempt employees that entail working extraordinary hours for an extended period. In such cases, the Company, at its sole discretion, may pay straight time pay to exempt employees for "special assignments" that require working more than the minimum number of required hours in a pay period, provided that:

- 1. The customer requests the special work assignment.
- 2. The straight time payment is reimbursable under the terms of the customer / company contract that applies to the employee.
- 3. The applicable Supervisor approves the hours recorded on the timesheet.

Special Work Assignments do not apply in situations where exempt employees perform work from time to time beyond regular hours to complete normal/regular work assignments.

As set out in this section, and subject to the prior approval of the Supervisor, an exempt employee earns additional "straight-time" compensation at a rate based on their annual rate divided by 2080 hours for each approved hour worked over the minimum number of hours for the pay period.



Paid leave time is counted, (e.g., Paid Leave, Holiday, Bereavement, Jury Duty, etc.) for purposes of defining work hours to calculate meeting the minimum number of hours for the pay period threshold.

Recordkeeping and Recording

Timesheets and Time Allocation

Timesheets are the source document for all payroll processing and contract reimbursement. As such, it is critical that timesheet recorded hours are accurate and timely, including all hours worked and any leaves taken, whether paid or not paid. UIC uses a total-time accounting basis and this method applies to both exempt and non-exempt employees. UIC uses an electronic timekeeping system for the majority of its work sites. Employees are responsible for keeping daily records and submitting timesheets as required. Managers and then the Payroll department approve and review timesheets.

Supervisors will provide employees with appropriate charge numbers for each project and task order that they are authorized to charge. Necessary corrections to timesheets should be made as soon as possible, because the changes and resulting financial transactions will be tracked, and should include a written explanation of any change on the timesheet. As with any other Company document, false information is never to be recorded and is subject to disciplinary action.

Compliance with Defense Contract Audit Agency

UIC complies with all applicable Defense Contract Audit Agency (DCAA) procedures and guidelines for recording, accumulating, and billing employee labor charges. The Company is responsible to establish and administer time accounting procedures that comply with applicable Defense Contract Audit Agency (DCAA) procedures and guidelines for recording, accumulating, and billing employee labor changes. Employees are responsible for adhering to the procedures established for the organization and described in this Handbook.

EXCEPTIONS

Exceptions require the approval of the subsidiary or Corporate Human Resources Director.



Revision	Change Description	Author / Revised By	Approved By	Effective Date
00	Original issue	UIC HR	CEO/President Anthony Edwardsen	4/17/13
01	Combine Work Schedule Policies and Timekeeping Requirements	Corporate HR Compliance Mgr. Selma Khan	CEO/President Delbert Rexford SOF	9/9/2019



ATTENDANCE

UIC-HR-2-6-027 Rev 0

PURPOSE

The purpose of this policy is to detail how absences and tardiness/early departure are counted for the purpose of maintaining excellent customer service throughout the business day.

ELIGIBILITY

This policy applies to all employees.

POLICY

Supervisors are responsible for defining a work schedule that meets and supports the business needs and/or contract requirements at each location. All employees are expected to be at their assigned workplace, ready to work at their regular starting time each day on which they are scheduled to work and during all scheduled work hours. Similarly, employees must return from any authorized break within the allotted time.

An employee should notify his/her supervisor as far in advance as possible, of any absence, but no later than thirty minutes prior to his/her scheduled starting time if he/she expects to be absent. Any absence greater than one day requires you notify your supervisor using the Leave Request Form. This policy applies for each day of his/her absence.

An employee should notify his/her supervisor no later than thirty minutes prior to his/her scheduled starting time if he/she expects to be late. When providing notification, the employee is expected to give the reason and the estimated arrival time when reporting late to work. This policy applies to each day of his/her tardiness.

An employee who fails to contact his/her supervisor may be subject to corrective action, up to and including termination. When providing notification, the employee is expected to give the reason and the estimated length of the absence.

The employee may be asked to provide a doctor's note after three consecutive absences or three occurrences within a ninety day period.

To the extent permitted by law, absenteeism and tardiness lessen employee's chances for advancement and may result in termination of employment.

Absences due to illness or injury which qualify under the Family and Medical Leave Act (FMLA) will not be counted against an employee's attendance record. Medical documentation within the guidelines of the FMLA will be required in these instances.



NO CALL/NO SHOW

Not reporting to work and not calling to report an absence is a no call/no show and is a serious matter. Employees are required to schedule leave (paid or unpaid) and receive approval from their supervisor. For additional details on how to schedule leave, please refer to the Leave with Pay: Paid Time Off Policy – UIC-HR-2-6-036. An employee who fails to report to work or has not notified the supervisor regarding an absence may be considered AWOL and may be presumed to have resigned after one working day. Management may consider extenuating circumstances when determining discipline for a no call/no show (for instance, if the employee is in a serious accident and is hospitalized) and has the authority to exercise discretion in such cases.

It is the responsibility of the employee's immediate supervisor to monitor and maintain a record of the attendance of the employee. If an employee has an attendance problem, i.e., repeated lateness, absence or a combination of both, the problem should be discussed with the employee as soon as it is noted.

Based on the employee's attendance record, and information resulting from the discussion, the supervisor will take appropriate action. If a problem is identified, corrective action should be taken. Management is authorized to use discretion in applying this policy under special or unique circumstances.

Exceptions to this policy may be established when necessitated by business practice or contractual obligations.

EXCEPTIONS

Exceptions require the approval of the subsidiary or Corporate Human Resources Director.

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	CEO/President	4/17/2013



TELECOMMUTING

UIC-HR-2-6-090 Rev0

PURPOSE

The purpose of this policy is to define approvals and reimbursable expenses for telecommuting.

ELIGIBILITY

This policy applies to all employees.

POLICY

As a general rule, employees are required to perform their work at a company or customer facility. Subject to Company approval and within contract limitations, there are instances where it is in the best interest of the customer, the Company, and the employee for the employee's work to be performed at a home office location.

Definition of Telecommuting Status

Full-Time, Regular: Employee's home is his/her main work site and works from home for the majority of his/her time.

Part-Time, Regular: Employee telecommutes on a predetermined schedule and splits his/her time between a home office and company/client site. For example, the employee may telecommute every Monday and Friday and work from a Company site Tuesday, Wednesday, and Thursday.

Temporary: Employee telecommutes on a full- or part-time basis for a defined period of time.

Episodic: Employees who do not telecommute on a regular schedule, but may need to telecommute on rare occasions for a short period of time due to reasons such as inclement weather, a sick family member, waiting for an at home service to be performed, etc.

Justification of Telecommuting Status

The manager must agree with and write a justification statement clearly describing the business reasons for telecommuting status. This request would be approved by the next line of authority. Telecommute status may be approved for the following reasons:

The employee's home location is outside the reasonable commute distance to an appropriate company or customer site. Any commute in excess of one and one-half hours may be deemed to fall under this rule;

The home work site is configured to accommodate a disabled employee and the employee's disability could not be reasonably accommodated at a company or customer work facility.

To accommodate a request due to medical reasons after the employee contacts the Human Resources Department for support and instructions. The work can be performed



at a remote site and does not require frequent face-to-face contact. Communications via telephone and email are adequate to perform the work properly.

In all cases, the supervisor judges that the employee has the ability to work independently and without onsite supervision.

The customer approves and the applicable contract permits telecommuting.

Other extenuating circumstances exist which will be reviewed on a case by case basis.

Approval of Telecommuting Status

Requests to telecommute must be made by completing the Telecommuting Request/Approval Form. The Request/Approval Form may be filled out by the employee or by the manager. Before the employee is authorized to telecommute, the proper documentation and approvals must be obtained.

The following approvals are required for Full-Time, Regular Basis and Part-Time, Regular Basis Telecommuting Status requests:

The Program Manager who should obtain concurrence from the customer's technical representative to determine if telecommuting status might pose problems in contract performance.

The Vice President/Director, and Human Resources

If the employee is not a direct-charge employee or a position which supports a Vice President/Director and/or President, President approval is required.

The following approvals are required for Temporary Basis Telecommute Status requests:

The program manager who should obtain concurrence from the customer's technical representative to determine if telecommute status might pose problems in contract performance.

The Vice President/Director, and Human Resources

The Telecommuting Request/Approval Form is not required for employees working from home on an episodic basis. However, the following approvals are required for this type of situation. Episodic Telecommute Status requests:

The direct supervisor or in instances where the employee supports more than one manager, all managers who will be affected by the employee's telecommuting status must be consulted prior to approval.

If the employee is approved to telecommute on a Full-Time, Regular or Part-Time, Regular basis, authorization to telecommute must be renewed in April of each year. If the employee is approved to telecommute on a temporary basis, authorization to continue to telecommute must be approved before the end of the active agreement.

Monitoring and Supervision of Telecommuting Employees

Telecommuting employees are not exempt from the Company's Policies and Procedures and are held to the same performance standards as all other employees in the workgroup.



If the employee's overall performance is not meeting expectations, a performance improvement plan will be initiated and, if appropriate, the Telecommuting Agreement will be reevaluated. If an employee is telecommuting on a part-time, regular basis, the employee and supervisor should agree upon a schedule to ensure the supervisor knows the whereabouts of the employee. If the employee's schedule changes he/she must notify the supervisor immediately. Timekeeping records must be maintained on a daily basis.

It is the supervisor's responsibility to assign and monitor the work product of the telecommuting employee. Assignments must be sufficiently detailed to give the telecommuting employee a clear understanding of the work to be accomplished and a work product documentation mechanism should be put into place to monitor the work of the employee. It is the responsibility of the employee and supervisor to determine the best documentation mechanisms.

Reimbursement of Home Office Expenses

The Company will reimburse certain expenses related to the maintenance of a home office including postage, business related long distance telephone and certain travel expenses. Expenses including rent, utilities, furniture, and most office equipment are not reimbursed. Home office employees are encouraged to provide their own computer equipment and software; however, in some cases the Company may provide such equipment and software. In such cases, when the Company provides equipment, it is the employee's responsibility to report any malfunctions to Corporate IT immediately. Requests for reimbursement of other expenses not noted above are handled on a case-by-case basis.

Safety and Security

Employees must complete the Safety Checklist and agree to comply with the safety and occupational health standards set forth by the Safety Department prior to commencing telecommuting. It is the employee's responsibility to maintain a safe work environment free of any unsafe conditions. The Safety Manager at any time may conduct an at home inspection to ensure the employee's workspace is in compliance with safety standards.

Telecommuting employees are covered by the Company's Worker's Compensation policy in the event of work-related injury, occupational illness, or death. It is the employee's responsibility to report any work related injuries to the Safety Manager immediately.

Program Managers must take necessary steps to coordinate between the employee, Corporate IT and the client, if applicable, to assure data is protected. The employee is responsible for the protection of any Company and/or customer proprietary data and must follow customer policies regarding classified/sensitive information. At the conclusion of the telecommuting assignment, all company/customer data must be turned over to the Company. Such data is and remains the property of the Company or customer, as appropriate.

Termination of Telecommuting Status

The Company has the right to end Telecommuting Status at any time including, but not limited to the employee's performance not meeting required standards, it is determined



that the work can no longer efficiently be done from a remote location, and/or the employee violates the Telecommuting Agreement.

EXCEPTIONS

Exceptions require the approval of the subsidiary or Corporate Human Resources Director.

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	CEO/President	05/01/2011



SALARY ADMINISTRATION

UIC-HR-2-6-092 Rev. 1

PURPOSE

The purpose of this policy is to attract, retain, and motivate well-qualified, dedicated employees while achieving the Company's business goals and strategies.

SCOPE

This policy applies to all employees.

POLICY STATEMENT

Salary administration is intended to occur on a regular cycle, considering a number of factors including, but not limited to, budget funding, results of competitive market information, contractual requirements, and business performance results. Individual employee pay adjustments are made considering individual performance. Automatic or annual pay increases are not guaranteed. Compensation, in general, may consist of salary or hourly pay, a variable pay program (for some businesses and/or roles), and other recognition programs.

Employees are assigned to job classifications that are aligned with their job. Those employees assigned to contracts may be categorized to a specific functional job classification based on contractual requirements. Salaries or hourly pay are determined by considering contract requirements, positioning based on market pay, an employee's expertise and experience, and internal peer equity.

Salary Structure

The Company maintains a salary structure that is used to facilitate compensation management. The structure has salary grades with each grade having a defined minimum, midpoint and maximum rate. Company job classifications are aligned to a salary grade based on market compensation survey data for like, or similar, job classifications. Employees supporting contracts covered by prevailing wage laws, to include, but not limited to, the Service Contract Act (SCA) or Davis Bacon Act (DBA), are paid in accordance with the prevailing wage determination incorporated into the contract without regard to the salary structure.

Salary Determination

All employees are assigned a corporate job classification that most closely identifies the employee's job. In addition, employees assigned to a contract may be assigned a functional job classification that is based on contract requirements. Salaries are based on contract requirements, market surveys for same, or similar, jobs in like industries and business size, and the salaries of other employees having similar job classifications and performing similar work.



Merit Increases

Under the authority of management the Company gives consideration to merit increases on an annual basis. If granted, merit increases are based on business conditions and constraints, profitability of our Company, competitive considerations, and individual employee performance.

Newly hired employees must be on the payroll for at least three months to be considered for a merit increase.

Promotional Increases

We offer the opportunity for professional advancement when an employee demonstrates a consistent track record of performance and develops skills and behaviors that qualify them for consideration for higher-level roles within the organization. Salary adjustments as a result of promotions are commensurate with increased responsibilities of the role and are effective at the beginning of the pay period following the date of eligibility.

Reclassifications

Employees may be reclassified from one position to another when job duties and responsibilities warrant the change. A reclassification is the lateral movement of an employee from one position to another position of the same level of complexity and within the same salary grade. Usually, there is no salary change associated with a reclassification.

Demotion

Under certain circumstances and at the discretion of the Company, employees who are subject to layoff or who lack the skills of their job classification may be offered a lower-rated position (demotion) in lieu of being terminated. A demotion is the reassignment of an employee to a position of substantially less responsibility. A demoted employee normally receives a reduction in salary, effective at the beginning of the pay period following the reassignment.

PAY INFORMATION

Paychecks

Employee paychecks will be delivered via a live check or direct deposit, based upon employee election. If employee elects direct deposit, pay is automatically deposited to the selected bank account(s). Employee will receive a statement in accordance with the payroll cycle that provides information about earnings, tax deductions, benefit deductions, and other deductions.

Payroll Advances

The Company does not provide payroll advances.



Relocation and Sign-on Bonuses

The Company does not provide relocation or sign-on bonuses as standard compensation to employees. At the Company's discretion, the Company may choose to provide relocation or a sign-on bonus for a particular position. The determination will be made on a case by case basis and requires approval of the subsidiary Human Resources Director with final approval by the Sr. Vice President, Chief Operating Officer, Chief Financial Officer or Chief Executive Officer/President. Payments will be made in accordance with federal and state law. In the event an employee receives relocation or a sign-on bonus and he/she voluntarily terminates employment, or is terminated for cause within twelve (12) months from the date of payment, he/she will be required to pay back the prorated amount of relocation or sign-on bonus paid by the Company.

Garnishment of Employee Wages

The Company addresses garnishments of an employee's wages (including child support) as a matter of state or federal legal requirements. An employee that is subject to a garnishment will be notified.

Administrative Pay Corrections

The Company reserves the right to make corrective payroll adjustments. Any error or pay adjustment will be addressed and communicated as soon as possible. Employees are expected to promptly review pay statements for each payroll and advise supervisor or the payroll department if there are any questions or concerns.

EXCEPTIONS

Exceptions require the approval of the subsidiary Human Resources Director and Senior Vice President of Operations. For Corporate employees approval from the CEO/President and the Chief Financial Officer.

Revision	Change Description	Author / Revised By	Approved By	Effective Date
1	Salary Administration and Relocation Policy combined	UIC HR	CEO/President Delbert Rexford SOF	4/22/2019



EMPLOYEE BENEFITS

UIC-HR-2-6-094 Rev. 1

PURPOSE

UIC provides benefits to employees that both satisfy legal requirements and provide employees with choices of quality benefits to meet their and their families' needs. The legally required benefits include Social Security, Worker's Compensation, State Disability, and Unemployment Insurance.

SCOPE

All Employees of UIC, its holding companies and its subsidiaries. Employees covered by the Service Contract Act should refer to the Service Contract Act (SCA) Benefits policy (UIC-HR-2-6-091). Employees covered by Collective Bargaining Agreements (CBAs) may have different Benefits and should refer to the specific terms of their respective CBA.

POLICY STATEMENT

UIC offers benefits to employees intended to provide protection in the event of an accident, illness, death, or other emergency in addition to retirement planning. Those benefits and associated provisions are described in the plan documents for each plan, and in the "wrap" plan document that describes UIC's comprehensive health and welfare plan. These documents are available to employees via the company's electronic resources. Employees who prefer paper versions may receive them through their Company's Human Resources department

In addition to the electronic resources available to employees, program-specific information is made available to employees at the time employment begins and during annual open enrollment periods.

HEALTH AND WELFARE BENEFITS

ELIGIBILITY

UIC provides "Basic" and "Voluntary" benefits to eligible employees. Benefits and associated documents are available on the Company's electronic resources.

All employees also have access to other additional I benefits within the Employee Assistance Program (EAP).

Most employees are eligible to participate in the Ukpeaġvik Inupiat Corporation Employees' Retirement Plan "401(k) plan". Employees under the age of 18, non-resident aliens and employees covered under a Collective Bargaining Agreement (CBA) are excluded, unless the CBA provides participation.

Regular, full time employees are eligible for: Basic Life, Basic Accidental Death and Dismemberment (AD&D), Basic Disability, Voluntary Medical, Voluntary Dental, and **PRINTED COPIES ARE NOT CONTROLLED** Page 87 of 167



Voluntary Vision benefits.

This is only a summary of eligibility. Please reference the plan documents for each benefit for a more detailed description of eligibility and other provisions.

PARTICIPATION & ENROLLMENT

Eligible employees are provided Basic Benefits: EAP, Basic Life, Basic AD&D, and Basic Disability, without any action required on their part. Employees do not have the option of waiving Basic Benefits.

In addition to Basic Benefits, UIC offers employees a menu of Voluntary Benefits. Employees choose Voluntary Benefits based on their needs and preferences. Voluntary Benefits include Medical, Dental, and Vision.

Employees elect Voluntary Benefits through their enrollment choices. If an employee does not enroll in a benefit, the Company will not provide it. Enrollments for Medical, Dental, and Vision benefits are conducted ONLY at hire, annually during open enrollment, and upon -a qualified life event. Employees may choose among different plan offerings and coverage levels (e.g., employee only, family).

Employees may also elect Voluntary Life and additional AD&D benefits during enrollments. 100% of the associated premiums for these elections are paid by the employee.

BENEFITS VALUE

Benefits have an associated value equal to the premium developed by a third- party actuary or vendor (for example, the value of the EAP is the fee charged by the providing vendor).

UIC makes an irrevocable contribution to a third-party or trustee to fund each of the benefits provided. The following table summarizes each of UIC's benefits programs and their associated funding mechanisms.

Benefit	Plan Name	Benefits Funding
Basic Life	UIC Health &	Premiums paid to carrier, claims paid by
	Welfare Plan	carrier
Basic	UIC Health &	Premiums paid to carrier, claims paid by
Disability	Welfare Plan	carrier
EAP	UIC Health &	Premiums paid to vendor, benefits provided
	Welfare Plan	by vendor
Medical,	UIC Health &	Employee and Employer premiums deposited
Dental	Welfare Plan	to VEBA Health & Welfare Trust, participants'
Vision		claims and plan expenses paid from the Trust



401(k)	Ukpeaġvik Inupiat Corporation Employees' Retirement Plan	Employee and Employer Contributions deposited to the 401(k) Trust, participants' benefits paid from the 401(k) Trust.

WORKER'S COMPENSATION

As provided for by law, an employee is covered under workers' compensation for occupational injury, illness, or death suffered in the course and scope of employment. If an employee is injured in the course and scope of work he/she shall report the injury immediately to his/her supervisor, who will complete the required Report of Occupational Injury or Illness within 24 hours.

It is very important that an employee tell his/her supervisor immediately about any workrelated injury or illness, regardless of how minor it might seem at the time. Prompt reporting helps to make sure that an employee qualifies for coverage as quickly as possible and allows the Company to investigate the matter promptly.

SOCIAL SECURITY

The Company pays contributions to Social Security that is deducted from the employee's pay. Social Security benefits include disability, retirement, and other benefits as allowable by law.

EXCEPTIONS

Some employees covered by Direct Charge, Davis Bacon Act (DBA), Little Davis Bacon Act/Title 36, Service Contract Act employees (SCA), or Collective Bargaining Agreement employees, may be subject to a different benefit options. Those employees should talk with their supervisor or human resources accordingly.

Revision	Change Description	Author / Revised By	Approved By	Effective Date
1	Original issue	Human Resources	CEO/President Delbert Rexford SOF	12/14/2020



SERVICE CONTRACT ACT (SCA) BENEFITS

UIC-HR-2-6-091 Rev 1

PURPOSE

UIC provides benefits to employees covered by the Service Contract Act (SCA) that both satisfy the requirements of the SCA, and provide employees with choices of quality benefits to meet their and their families' needs.

ELIGIBILITY

All employees covered by the SCA.

HEALTH & WELFARE (H&W) FRINGE BENEFITS

UNDERLYING BENEFITS

UIC provides SCA employees with the same benefits eligibility offered to our non-SCA employees. Those benefits and associated provisions are described in the plan documents for each plan, and in the "wrap" plan document that describes UIC's comprehensive health and welfare plan. These documents are available to employees on the company's Employee Portal (intranet). Employees who prefer paper versions may receive them through their company's human resources department.

<u>ELIGIBILITY</u>

UIC provides "Basic" and "Voluntary" benefits to our SCA employees. SCA employees must satisfy the eligibility requirements, as described in the respective plan document for each plan. Generally:

All employees have access to the benefits within the Employee Assistance Program(EAP).

Most employees are eligible to participate in the Ukpeaġvik Iñupiat Corporation Employees' Retirement Plan ("401(k) plan"). Employees under the age of 18, non-resident aliens and employees covered by a Collective Bargaining Agreement are excluded, unless such agreement provides for participation.

Regular, full time employees are eligible for: Basic Life, Basic Accidental Death and Dismemberment (AD&D) Basic Disability, Voluntary Medical, Voluntary Dental, and Voluntary Vision benefits.

This is only a summary of eligibility. Please reference the plan documents for each benefit for a more detailed description of eligibility and other provisions.



PARTICIPATION & ENROLLMENT

Eligible employees are provided Basic Benefits: EAP, Basic Life, Basic AD&D, and Basic Disability, without any action required on their part. Employees do not have the option of waiving Basic Benefits.

In addition to Basic Benefits, UIC offers SCA employees a menu of Voluntary Benefits. Employees choose Voluntary Benefits based on their needs and preferences. Voluntary Benefits include Medical, Dental, and Vision.

Employees elect Voluntary Benefits through their enrollment choices. If an employee does not enroll in a benefit, the company will not provide it. Enrollments for Medical, Dental, and Vision benefits are conducted ONLY at hire, annually, and upon -a qualified life event. Employees may choose among different plan offerings and coverage levels (e.g., employee only, family).

Employees also may elect Voluntary Life and AD&D benefits during enrollments.

100% of the associated premiums are paid by the employee and are NOT included in Fringe Obligation calculation.

BENEFITS VALUE

Benefits have an associated value equal to the premium developed by a thirdparty actuary or vendor (for example, the value of the EAP is the fee charged by the providing vendor).

UIC makes an irrevocable contribution to a third-party or trustee to fund each of the benefits provided to meet the Fringe Obligation for employees covered by the SCA. The following table summarizes each of UIC's benefits programs and their associated funding mechanisms.

<u>UIC Benefit Programs Used for SCA H&W Fringe Benefits & Associated</u> Funding

Benefit	Plan Name	Benefits Funding
Basic Life	UIC Health & Welfare Plan	Premiums paid to carrier, claims paid by carrier
Basic Disability	UIC Health & Welfare Plan	Premiums paid to carrier, claims paid by carrier
EAP	UIC Health & Welfare Plan	Premiums paid to vendor, benefits provided by vendor



Medical, Dental Vision	UIC Health & Welfare Plan	Employee and Employer premiums deposited to VEBA Health & Welfare Trust, participants' claims and plan expenses paid from the H&W
401(k)	Ukpeaġvik Inupiat Corporation Employees' Retirement Plan	Employee and Employer Contributions deposited to the 401(k) Trust, participants' benefits paid from the 401k Trust.

FIXED COST H&W FRINGE BENEFITS

UIC's standard methodology for meeting the Fringe Obligation for our employees covered by the SCA under a contract that specifies the "Each Service Employee" requirement is to provide employees with a package of Basic Benefits and to allow them to elect from a menu of Voluntary Benefits. The combined value of Basic and elected Voluntary Benefits is calculated each period and compared against the Fringe Obligation for the same period. The Fringe Obligation is computed pursuant to the requirements in the Service Contract Act and associated regulations and the applicable Area Wage Determination (AWD).

If the value of the Basic and elected Voluntary Benefits falls short of the Fringe Obligation, UIC will make an additional UIC Contribution to the employee's 401(k) account for the amount of the difference to fulfill the Fringe Obligation (Fringe Fulfilling UIC 401(k) Contribution). If an employee does not have an account, an account will be created to receive these contributions. For employees on certain contracts, UIC may provide this difference in a cash payment to the employee in lieu of an additional UIC Contribution to the employees 401k account.

If the value of the Basic and elected Voluntary Benefits exceeds the fringe obligation, the difference will be deducted from the employee's eligible wages for that period.

Examples:

The below examples are illustrative only – benefits value and fringe rates are subject to change over time. All values assume a bi-weekly payroll.

Example 1: Basic and Voluntary Benefits Require Additional 401(k) Contribution

	Benefits	Value
A	Basic Life	\$5.00
PRI	NTED COPIES ARE NOT CONTROLLED	Page 92 of 167



В	Basic Disability		\$7.00
С	Basic EAP		\$1.50
D	Voluntary Medical – EE Only	\$178.97	
E	Voluntary Dental – EE Only	\$20.11	
F	Voluntary Vision – EE Only		\$3.97
G	401(k) Match	\$40.00	
	Total Value of Basic & Voluntary Benefits (Sum A:G)	\$256.55	
	Fringe Obligation	Value	
Н	Fringe Hours		80
I	Fringe Rate		\$3.59
J	Fringe Obligation (H X I)	\$287.20	
	Fringe Surplus/Shortfall	Value	
K	Value of Basic & Voluntary Benefits	\$256.55	
L	Fringe Obligation	\$287.20	
М	Fringe Surplus/(Shortfall)(L-K)	\$30.65	
	Fringe Fulfilling UIC 401(k)	Value	
	Contribution/(Deduction)		
Ν	401(k) Contribution	\$30.65	
Exa	mple 2: Basic and Voluntary Benefits Require Employee	Deduction	
	Benefits	Value	
A	Basic Life		\$5.00
В	Basic Disability		\$7.00
С	Basic EAP		\$1.50
D	Voluntary Medical – Family	\$562.84	
E	Voluntary Dental – Family	\$60.72	
F	Voluntary Vision – Family	\$12.48	
G	401(k) Match	\$40.00	
	Total Value of Basic & Voluntary Benefits (Sum A:G)	\$689.54	
	Fringe Obligation	Value	
Н	Fringe Hours		80
I	Fringe Rate		\$3.59
J	Fringe Obligation (H X I)	\$287.20	
	Fringe Surplus/Shortfall	Value	
K	Value of Basic & Voluntary Benefits	\$689.54	
L	Fringe Obligation	\$287.20	
М	Fringe Surplus/(Shortfall)(L-K)	(\$402.34)	
	Fringe Fulfilling UIC 401(k) Contribution/(Payroll Deduction)	Value	
N	Payroll Deduction (pre-tax)	\$402.34	



"AVERAGE COST" H&W FRINGE RATES

When a contract specifies that use of the "Average Cost" requirement for meeting the Fringe Obligation, UIC will use the same methodology described above with the following exceptions:

- The Fringe Obligation is calculated using the "All Hours Worked" methodology specified in the SCA regulations.
- If the value of the Basic and elected Voluntary Benefits falls short of

the Fringe Obligation, UIC will make up the difference in the form of a UIC Contribution to the employee's 401k account – there is no option to use cash.

COLLECTIVELY BARGAINED (CBA) H&W FRINGE BENEFITS

UIC will provide benefits to employees covered by a CBA consistent with the provisions of the CBA.

FRINGE RECORDKEEPING & REPORTING

Recordkeeping for the fringe obligation and benefits used to fulfill it is performed each pay period using the company's payroll system. Supplemental calculations may be performed by spreadsheet. Employees' paychecks contain information regarding their SCA fringe benefits. Employee may contact their HR department for additional information.

VACATION AND HOLIDAY BENEFITS

UIC provides employees covered by the SCA with vacation and holiday benefits that are equal to or greater than those required by the contract's AWD.

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	CEO/President	01/01/2013
01	Minor language corrections – no substantive change to policy	B. Oyagak	Thomas Showalter	08/08/2014



TUITION REIMBURSEMENT POLICY

UIC-HR-2-6-085 Rev. 2

Purpose

The purpose of this policy is to identify the eligibility and conditions required to qualify for financial assistance for employees who wish to further their education.

Scope

Ukpeagvik Iñupiat Corporation and its family of companies.

Policy Statement

The Corporation provides financial assistance to the employees who wish to further their education through a degree program, or an industry recognized certification that is mutually beneficial to the company and the employee.

Eligibility

This policy applies to regular fulltime employees who have ninety (90) days service and are continuously employed for the duration of each course.

Employee is to fill out the Tuition Reimbursement Request Form and turn in to Human Resources prior to enrollment of courses. Employee and direct Supervisor of employee are required to work with the Human Resources department on confirmation of eligibility for tuition reimbursement.

In the case of a Company-initiated layoff for lack of work, employees are eligible to receive previously approved reimbursement if all other conditions set forth on this policy are satisfied.

Conditions

Employees may receive a maximum \$5,250.00 for tuition reimbursement for courses in a calendar year. The date of the completion of the course determines which year the reimbursement is credited toward the yearly maximum.

The employee and manager should explore all available means of funding before use of this policy, i.e. scholarships, grants, veterans' administration, etc.

Should the total cost for tuition, external training, and certifications paid for by the Company exceed \$500 and the employee voluntarily resigns or is terminated for cause within twelve (12) months of completing the course, training, or certification exam, the employee must reimburse the Company the cost, prorated on a full month basis, of the employee's Company paid tuition, training, and/or certifications. The employee must agree to these terms prior to the Company making any payments toward tuition, training, or certifications. Furthermore, in situations where the amount to be reimbursed to the Company exceeds the **PRINTED COPIES ARE NOT CONTROLLED** Page 95 of 167



amount of the employee's final paycheck, the employee must agree to fully reimburse the Company the balance of the amount owed within six (6) months of the separation date. However, there is no obligation to repay the Company in the event the employee is laid off for lack of work.

Exceptions

In special circumstances, managers can provide justification for the ninety (90) days of employment requirement, and also for tuition reimbursement for courses that are not required for an undergraduate/graduate degree program, training, certification, or for other unique separation circumstances outside of the employee or company's control.

The employee's manager may also deny the tuition reimbursement request due to business reasons such as budget, etc.

UIC is committed to the development of our UIC shareholders and descendants and as such has additional programs available for their benefit.

All other tuition reimbursement requests outside of this policy must be approved by the Sr. Vice President, Chief Operating Officer, Chief Financial Officer or Chief Executive Officer/President.

Revision History

Revision	Change Description	Author / Revised By	Approved By	Effective Date
1	Original issue	UIC Sr. Director HR Jennifer Reichelt	President/CEO Anthony E. Edwardsen	7/14/17
2	Update annual limit	UIC HR	President/CEO Delbert Rexford SOF	1/1/2021



TRAINING AND CERTIFICATES

UIC-HR-2-6-015 Rev 1

PURPOSE

The purpose of this policy is to specify the requirements for payment or employee reimbursement for the costs of training and certifications.

ELIGIBILITY

This policy applies to all regular full time employees who have ninety (90) days service and are continuously employed for the duration of each course or training period. In the case of a Company-initiated layoff for lack of work, employees may be eligible to receive previously approved training and/or certification reimbursement if all other conditions set forth on this Policy are satisfied. In some cases, due to contract and/or job requirements, employees may be eligible to participate in Company paid training and/or certification programs prior to completing ninety (90) days service and regardless of the employee's Employment Category (with manager approval). In addition, regardless of their days of service or Employment Categories, all employees will be eligible to participate in Internal Training programs.

POLICY

The Company may pay for the cost of training for and/or reimburse an employee for certification/recertification fees to employees who wish to improve their job skills and qualifications through training and certification that is mutually beneficial to the employee and the Company.

Training courses and Certifications must either:

- Directly increase the employee's value to the Company in their present position, or
- Increase the employee's potential value in a more responsible position that the employee may reasonably be promoted.

Requests for Training and Certification are subject to the prior approval of the manager. Should the total cost for tuition, external training, and certifications paid for by the Company exceed \$500 and the employee voluntarily resigns or is terminated for cause within twelve (12) months of completing the course, training, or certification exam, the employee must reimburse the Company the cost, prorated on a full month basis, of the employee's Company paid tuition, training, and/or certifications. The employee must agree to these terms prior to the Company making any payments toward tuition, training, or certifications. Furthermore, in situations where the amount to be reimbursed to the Company exceeds the amount of the employee's final paycheck, the employee must agree to fully reimburse the Company the balance of the amount owed within six (6) months of the separation date. However, there is no obligation to repay the Company in the event the employee is laid off for lack of work.

The Company will pay for all approved training courses up front by following proper purchasing procedures. Certification fees will be reimbursed only upon satisfactorily **PRINTED COPIES ARE NOT CONTROLLED** Page 97 of 167



completing certification/recertification requirements and providing supporting documentation to Human Resources for submission to Accounts Payable.

Upon completion of all training and certification/recertification requirements all documentation, including certificates of attendance and copies of certifications, should be sent to Human Resources to ensure the employee's training and certification records are updated. Human Resources will keep all documentation in the employee's personnel file.

TYPES OF TRAINING

Employees may be eligible for three (3) types of training/certification programs:

Internal Training

This includes any training that is sponsored and/or facilitated by the Company, including any courses an employee takes through the Company's online Learning Management System (LMS). Access to the LMS can be obtained through the UltiPro HCM system.

External Training

Courses include classroom training and/or Internet-based training that is not a part of the company's internal training and may include seminars, forums, clinics, classes, lectures, conferences, or meetings.

Certification/Recertification

Certification/Recertification includes any fees associated with obtaining a certification or recertification. Fees include exam fees and fees to submit an application for recertification. The Certification must be obtained through a recognized institution that is certified to issue a certificate of satisfactory completion.

Employees requesting reimbursement for Certification/Recertification must complete, sign, and submit a Certification Reimbursement Request Form to his/her Program Manager and Human Resources for approval prior to enrolling.

Approval for reimbursement is usually for the full cost of the certification fees paid for by the employee; however, approval for reimbursement may be less than the full cost based on budgetary restrictions.

The amount of reimbursement is not subject to a monetary calendar year limit; however, certificate of satisfactory completion must be achieved.

EXCEPTIONS

Exceptions require the approval of the subsidiary or Corporate Human Resources.



Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	President/CEO	10/23/2012
01	Update to policy	UIC HR	President/CEO Delbert Rexford SOF	2/8/2021



LEAVE WITH PAY - PAID TIME OFF POLICY

UIC-HR-2-6-036 Rev. 5

PURPOSE

The purpose of this policy is to specify the conditions of Paid Time Off (PTO) program available to UIC employees. This policy is to be used in conjunction with the subsidiary-specific addendums. Please check with your Human Resources department for your company specific addendum.

SCOPE

All Employees of UIC its holding companies and its subsidiaries, except as otherwise specifically set out in the Exceptions below or in any subsidiaryspecific addendums.

POLICY STATEMENT

The Company provides paid time off for illness and for the rest and recreation of the employee. Certain subsidiaries within the Company have specific PTO accrual provisions that are relevant for their business and consider market competitiveness. PTO pay does not apply to part-time or temporary employees and typically will not apply to skilled trade employees.

Where appropriate, PTO must be preapproved by and prescheduled with the employee's supervisor and may be taken in hourly increments. Approval for all scheduled time away is subject to applicable workloads. Leave requests are to be made to the employee's supervisor in writing by email or by form (Request for Leave or Approved Absence Form UIC-HR-4-6-103) specifying dates and duration.

Employees who are employed for at least 12 months and are rehired after a break in service of twelve (12) months or less will receive credit for prior service for purposes of calculating their paid leave accrual rate.

PTO INCREMENTS

Salaried (Exempt) employees who have fulfilled the total number of hours in the pay period (8 hours times the number of standard work days in the pay period) do not need to use PTO if it occurs in the same pay period.

Salaried employees who have NOT fulfilled all of the hours in the pay period will need to use PTO if it occurs in the same pay period. If an employee has exhausted all of their accrued PTO and works only a partial day, they must record negative leave. Unless on approved FMLA, exempt employees may not record LWOP for partial days.



Examples of how the PTO policy is applied for salaried employees:				
Scenario:	Action:			
I worked 2 hours less than the standard pay period. How do I record the extra two hours that I missed?	If you have PTO, you must use it to cover partial-day absences to record all hours in the pay period.			
I worked 2 hours less than the standard pay period. I have no PTO remaining. Should I record LWOP?	Exempt: If you have exhausted all of your PTO, you must record negative leave. LWOP can only be used for partial-day absences by an exempt employee in special circumstances including approved FMLA absences. Non-Exempt: You may count those 2 hours as LWOP.			
I have already worked 10 hours over the total number of hours in the pay period. Today is the last day of the pay period and my supervisor has approved my request to take a half day. Do I need to take 4 hours of PTO to show a total of 8 hours for the day?	No. You only need to record the 4 hours worked today since you have already met or exceeded the total number of hours in the pay period.			
I took at half day on Monday, and recorded 4 hours of regular time and 4 hours of PTO. I then worked an extra hour on each of the next 4 days in the pay period. Since I worked the total number of hours in the pay period, will I still be docked the 4 hours of PTO that I recorded on Monday?	Yes, if you do not adjust your timecard. Since you met or exceeded the number of hours in the pay period without using PTO, you can remove the PTO hours from your timecard. It is the employee's responsibility to make sure the timecard does not unduly reduce PTO when it is not needed.			
Tomorrow is the last day of the pay period. I have already worked 10 hours more than the total hours in the pay period. If I take tomorrow off, do I need to record PTO?	No. You have already met or exceeded the total number of hours in the pay period so you do not need to record anything for tomorrow if you take the day off.			

Leave For Illness or Injury

An employee is accountable for notifying their supervisor of any day missed. In the absence of notification, employees may be subject to disciplinary action. The Company may require additional information regarding illness or injury such as a release to return to work by the employee's physician. All releases and doctor's notes must be submitted directly to the HR Department.

Leave Accrual Determination and Advanced Leave Accrual

Employees earn PTO on a pay period basis and may use PTO when earned.



PTO accrued but not used may accumulate to a maximum of 240 hours as of the last payroll week worked of a calendar year. Employees will continue to accrue PTO over the 240-hour cap during the year, but they must bring their balance down to 240 hours by the end of each year by using the leave. The 240-hour cap will rollover into a new year.

An employee is not allowed to take PTO unless the employee has already accumulated sufficient PTO to cover the time off. If an employee requires time off and has not accrued sufficient PTO to cover the absence, such time off is unpaid.

However, in an emergency situation, the holding company general manager or Human Resources may approve a negative PTO balance of up to 24 hours. Exempt employees may use negative leave for partial-day absences, as described in the PTO increments section above. Unless on approved FMLA, employees must exhaust all of their accrued PTO prior to using LWOP.

Leave Accrual During Unpaid Leave of Absence

Employees that have paid time during a pay period will accrue PTO during that pay period. Employees that do not have paid time during a pay period will not accrue PTO for that pay period.

Unused PTO

Only 240 hours of accrued PTO may carry over to the next calendar year (as of the last payroll workweek of a calendar year). Time accumulated in excess of 240 hours will not be cashed out and therefore will be forfeited.

Leave Donation

The Company does not allow donation of unused PTO by one employee to another.

Cash-Out Upon Termination

Upon termination from employment, an employee will be paid all accrued and vested unused PTO.

Responsibilities of Employee

The employee is accountable for requesting planned leave in advance of taking leave. As stated above, advanced notice is required. A formal leave request is encouraged to be completed and approved by the employee's supervisor or requested and approved in writing. The employee is also accountable for managing their PTO in accordance with their personal needs as well as the maximum limits established by the Company.

EXCEPTIONS

Some employees covered by Direct Charge, Davis Bacon Act (DBA), Little Davis

PRINTED COPIES ARE NOT CONTROLLED



Bacon Act/Title 36, Service Contract Act employees (DCA), or Collective Bargaining Agreement employees (CBA), will typically not be entitled to PTO and may be subject to a different paid time off requirements in order to be eligible for paid leave in accordance with those regulations. Those employees should talk with their supervisor accordingly.

UIC Commercial Services and its subsidiaries' employees are only eligible for PTO under this policy if their primary work location is office based or they are classified as an exempt employee. UIC Commercial Services and its subsidiaries' employees, including but not limited to its non-exempt employees and its skilled trade employees, working in the field, working on rotational projects, working on projects subject to the Davis Bacon Act (DBA) or Little Davis Bacon Act/Title 36, or subject to collecting bargaining agreements, or any other regulation requiring PTO, are not eligible for PTO unless required by those regulations, the collective bargaining agreement, or by the contract/project.

Exceptions to this policy require the employee to submit a written request to Human Resources or Designee with final approval by the Sr. Vice President, Chief Operating Officer, Chief Financial Officer or Chief Executive Officer/President.

Revision	Change Description	Author / Revised By	Approved By	Effective Date
00	Original issue	UIC HR	CEO/President Anthony Edwardsen	03/15/2011
01	Updates to Policy	UIC HR	CEO/President Anthony Edwardsen	04/17/2013
02	Administrative Updates	UIC HR	CEO/President Anthony Edwardsen	07/09/2013
03	Updates to Policy	Sr. HR Director Jennifer Reichelt	CEO/President Anthony Edwardsen	03/02/2017
04	Updates to Policy	Sr. HR Director Jennifer Reichelt	CEO/President Delbert Rexford	07/03/2018
05	Updates to Policy Statement	HR Manager Selma Khan	CEO/President Delbert Rexford SOF	12/17/2019



HOLIDAY PAY

UIC-HR-2-6-037 Rev 2

PURPOSE

The purpose of this policy is to define the number of "paid holidays" eligible company employees will receive. Use this policy in conjunction with the applicable subsidiary-specific addendums/service contracts. Please check with your Human Resources department for your company specific information.

SCOPE

All Employees of UIC its holding companies and its subsidiaries, except as otherwise specifically set out in the Exceptions below or in any applicable subsidiary-specific addendums.

POLICY STATEMENT

Regular full-time employees are eligible for holiday pay, unless they are on leave without pay status during the entire pay period that the holiday is observed. Holiday pay does not typically apply to part-time, temporary employees, or skilled trade employees.

Holiday schedules may differ between businesses in the corporation due to business demands. For example, major subsidiaries within the corporation are aligned with federally recognized holidays. Alaska-based businesses recognize Alaska Day officially declared by the State of Alaska.

Employees are not expected to work on holidays except as required by continuing company operations, special schedules or other business/customer needs.

<u>Holiday Pay</u>

Exempt employees receive holiday pay equivalent to their current rate of pay at their current work hour schedule.

Regular Non-Exempt employees receive holiday pay equivalent to their current rate of pay at their current work hour schedule. Holiday pay is not considered time worked for computation of overtime.

Holidays that fall on Saturday will be observed on the preceding Friday. Holidays that fall on a Sunday will be observed on the following Monday.

Working on a Holiday

Occasionally, employees may be required to work on a Holiday to meet continuing company operations, special schedules or to meet other business or



customer needs. Subject to approval by the manager, employees who are required and authorized to work on a holiday are compensated as follows:

- Exempt employees will be paid Holiday pay equal to the difference in hours worked on the Holiday and eight hours. Exempt employees will be allowed to "float" holiday hours to another date acceptable to them and their supervisor. A floating holiday means a paid day off from work, given as a substitute for a public holiday and typically taken on a day chosen by the employee and approved by their supervisor.
- 2. Non-Exempt employees do not typically float holidays because they are paid for the holiday in addition to any hours worked on that day. For example, if the employee worked forty (40) hours during the workweek and one of those days was a holiday they would be paid 48 hours.

Subject to the manager's approval, a Non-Exempt employee may be allowed to "float" holiday hours to another date acceptable to them and their supervisor. Non-exempt employees will be paid for hours worked on a holiday. In lieu of the employee being paid eight hours Holiday pay in addition to hours worked on a holiday, the employee has the option to "float" the holiday hours equal to the hours worked on the Holiday and only be paid Holiday pay equal to the difference in hours worked on the Holiday and eight hours.

Floating holiday hours may be used in hourly increments, but must be used by December 31st of each year. Under no circumstances may a floated holiday be carried over to the next calendar year, nor may it be cashed out if not taken or paid upon termination of employment.

The use of a floating holiday must be scheduled and approved, similar to PTO, in advance by the employee's immediate supervisor.

EXCEPTIONS

For some businesses, contractual or program demands may require a change in holiday schedule.

Some employees covered by Direct Charge, Davis Bacon Act (DBA), Little Davis Bacon Act/Title 36, Service Contract Act employees (DCA), or Collective Bargaining Agreement employees (CBA), will typically not be entitled to holidays and may be subject to a different holiday and holiday pay requirements. Employees should talk with their supervisor accordingly.

UIC Commercial Services and its subsidiaries' employees are only eligible for holiday pay under this policy if their primary work location is office based or they are classified as an exempt employee. UIC Commercial Services and its

PRINTED COPIES ARE NOT CONTROLLED



subsidiaries' employees, including but not limited to its non-exempt employees and its skilled trade employees, working in the field, working on rotational projects, working on projects subject to the Davis Bacon Act (DBA) or Little Davis Bacon Act/Title 36, or subject to collecting bargaining agreements, or any other regulation requiring holidays, are not eligible for holidays unless required by those regulations, the collective bargaining agreement or by the contract/project.

Exceptions to this policy require the employee to submit a written request to Human Resources or Designee with final approval by the Sr. Vice President, Chief Operating Officer, Chief Financial Officer or Chief Executive Officer/President.

Revision	Change Description	Author / Revised By	Approved By	Effective Date
0	Original issue	UIC HR	CEO / President Anthony Edwardsen	3/15/2011
1	Added Floating Holiday Practice	Corp SR Director of HR Jennifer Reichelt	CEO / President Delbert Rexford	7/3/18
2	Update Exceptions to Policy	Selma Khan	CEO / President Delbert Rexford SOF	12/17/2019



BEREAVEMENT LEAVE

UIC-HR-2-6-045 Rev 1

PURPOSE

The purpose of this policy is to provide time off with pay for employees in the event of a death or an anticipated death of an immediate family member.

SCOPE

Ukpeaġvik Iñupiat Corporation, its holding companies, and subsidiaries

All regular fulltime employees who work at least 32 hours per week are eligible for paid time off under this policy.

Employees working on a contract may not be eligible for these benefits and should contact Human Resources or their supervisor to receive a listing of contract specific benefits.

POLICY STATEMENT

Employees may receive up to three consecutive work days of paid company leave per eligible event for bereavement for the death or anticipated death of an immediate family member.

An additional day of bereavement leave will be allowed if the employee is required to travel more than 400 miles to attend the funeral, for a maximum of four days. If traveling out of Alaska is required, two additional days of bereavement are allowed, for a maximum of five days.

Definition of Immediate Family Member

Immediate family member means the employee and spouses' mother, father, sister, brother, husband, wife, son, daughter, grandparents, grandchild, stepfather/mother, stepson/daughter, or unmarried domestic partners.

Bereavement Leave for Non-Immediate Family Members

An employee who wishes to attend funeral services or take bereavement leave for an individual that does not meet the above definition may use personal leave, or, if PTO is exhausted, use leave without pay, with the supervisors advanced approval.

Combination with Other Paid Time off Benefits

With supervisor approval, an employee may use any available paid leave benefits if additional time off is needed. Verification of death may be required (e.g. death certificate, obituary notice, memorial leaflet, or other). The company

PRINTED COPIES ARE NOT CONTROLLED

Page 107 of 167



reserves the right to request documentation of medical emergencies or deaths.

EXCEPTIONS

Exceptions require the approval of the General Manager and the Human Resources Director. For Corporate employees, approval by the CEO/President and Corporate Senior Human Resources Director is required.

Revision	Change Description	Author / Revised By	Approved By	Effective Date
0	Original issue	UIC HR	CEO/President Anthony Edwardsen	03/15/2011
1	Revision of definition of family member	Corporate Sr. Director of HR, Jennifer Reichelt	CEO/President Delbert Rexford	07/03/2018



JURY DUTY AND WITNESS LEAVE

UIC-HR-2-6-043 Rev 0

PURPOSE

The purpose of this policy is to provide time off for employees who are notified by state or federal courts of an obligation to serve on a jury or as a court witness.

ELIGIBILITY

Regular and full-time employees who work at least 32 hours per week are eligible for paid time off under this policy.

Employees working on a contract may not be eligible for these benefits and should contact HR or their supervisor to receive a listing of contract specific benefits.

POLICY

NOTIFICATION

Employees should immediately notify their supervisor when they receive a jury summons or subpoena so that supervisors can plan for their possible absence from work. Employees are required to provide copies of the jury summons or subpoena to their supervisor.

<u>PAY</u>

The company may provide up to 80 hours of paid leave per year to employees when they are notified by state or federal courts of an obligation to serve on a jury or as a court witness.

Employees appearing as witnesses in connection with their job with the Company shall be credited with paid official duty time. The manager will make the decision whether the employee is appearing as a witness in connection with his/her job with the Company.

WORK SCHEDULE

Whenever the court schedule permits, the employee is expected to come to work, to the extent that combined time on jury duty and at work does not exceed 8 hours per day.

COMBINATION WITH OTHER LEAVE TYPES

If jury duty extends beyond 80 hours, employees may utilize their PTO for this leave or, if PTO is exhausted, be on unpaid leave of absence.

COMPANY HARDSHIP

In the event that an employee's absence would cause a hardship on the Company or its customers, the Company may petition the Court to excuse the employee from jury duty service.



EXCEPTIONS

Exceptions require the approval of the General Manager and the subsidiary Human Resources Director. For Corporate employees, approval by the President and Corporate Human Resources Director is required.

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	CEO/President	03/15/2011



MILITARY LEAVE

UIC-HR-2-6-089 Rev 0

PURPOSE

The purpose of this policy is to define the Company's policy regarding seniority, status, pay, and fringe benefits should it become necessary for an employee to take a leave of absence for Uniformed Service.

ELIGIBILITY

The Company's Military Leave Policy is intended to comply fully with the relevant requirements of the Uniformed Services Employment and Re-employment Rights Act of 1994 as amended (USERRA).

For purposes of this policy, Uniformed Service is defined as the Army, Navy, Marine Corps, Air Force, or Coast Guard; the Army Reserve, Naval Reserve, Marine Corps Reserve, Air Force Reserve, or Coast Guard Reserve; the Army National Guard or Air National Guard; Commission Corps of the Public Health Service; and any other category of persons designated by the U.S. President in time of war or emergency.

Service is defined as the performance of military duty on a commission or non-commission status, and on a voluntary or involuntary basis, in a Uniformed Service, including active duty; active duty for training; initial active duty for training; inactive duty training; full-time National Guard duty; absence from work for physical examinations to determine an individual's fitness for Service in the Uniformed Services; and funeral honors duty by National Guard or reserve members.

POLICY

Under USERRA, it is unlawful for an employer to refuse an employee's request for leave of absence for Service or to discriminate in employment or reemployment based on membership in the Uniform Services or based on actual Service.

USERRA extends re-employment rights for up to five (5) years to individuals who have been absent from work for military duty in the Uniformed Services.

Leave Notification Requirements

If an employee must take a leave of absence from work for Service, the employee must notify his/her supervisor and Human Resources in advance, either in writing or verbally. The Company expects to be notified as soon as the employee is aware of the need for leave, unless advance notice is unreasonable based on military necessity.

Length of Leave

Re-employment rights may only be retained if an employee's cumulative length of leave for Service is 5 years or less. The 5 year limit does not include inactive duty training; annual training; involuntary recall to active duty or involuntary retention on active duty; or voluntary or involuntary active duty in support of war, national emergency, or certain operational missions.



Pay During Leave

A full-time employee who is a member of the Uniformed Service and takes a leave of absence for Service will be paid for a period of up to 10 working days.

An employee's pay during a Service leave will equal the difference between the employee's normal base pay immediately prior to commencement of Service leave, and what he/she receives as compensation for Service.

For non-exempt employees, base pay equals the individual's normal base hourly rate multiplied by the number of hours the individual normally is scheduled to work each day, up to a maximum of eight hours per day.

Evidence of any amounts received as compensation for Service must be presented to Human Resources.

Leave beyond 10 working days will be unpaid. Full-time employees may use earned Paid Time Off benefits during unpaid leave, but are not required to do so.

BENEFITS DURING LEAVE

Health and Dental Coverage

During a Service leave, a full-time Company employee will be eligible for coverage through the Company's plans for him/herself and covered dependents, at active employee rates, for up to 30 calendar days (one month).

In the case of Service leave exceeding 30 calendar days, USERRA requires the Company to extend health and dental coverage to the employee and his/her covered dependents, at a charge of 102% of the premium, until the lesser of 24 months from the date the employee's civilian employment ended, or until the end of the period allowed for the individual to apply for re-employment.

"COBRA" continuation rights also apply to the employee and each of his/her covered dependents. Individuals are generally eligible for continued health, dental, and/or coverage through the Employee Assistance Program via COBRA for up to 18 months.

COBRA participants pay 100% of the premium required for their coverage, plus a 2% administrative fee. The maximum period of continued health and dental coverage is 24 months.

Flexible Spending Accounts Plan

A full-time employee may continue coverage through the Medical Expense Reimbursement Account for up to 24 months during military leave.

Life Insurance and Long-term Disability Insurance Coverage

Life and long-term disability coverage end on the employee's last actual working day at the Company prior to leave. An employee on leave may choose to port his/her group life insurance policy to an individual policy in order to retain coverage. To do so, the employee must contact the Company's life insurance carrier within 31 calendar days of loss of coverage under the group policy, and pay premiums in a timely manner. If the former

PRINTED COPIES ARE NOT CONTROLLED

Page 112 of 167



Company employee is re-employed by the Company, he/she will have the option to port the individual policy back to the group life policy.

Retirement Savings Plan

Both Company and elective contributions to the retirement savings plan are discontinued during an unpaid leave of absence

Paid Time Off

Paid Time Off eligibility based on length of service will continue to accrue during a leave for Service for a full-time employee, according to the Company's benefit plans.

Re-employment

A former Company employee is eligible for re-employment following Service if (1) he/she gave advance written or verbal notice to the Company of the need for military leave, unless advance notice was not possible based on military necessity, (2) the cumulative length of the employee's absence from the Company for Service did not exceed 5 years, (3) the employee was released from Service under honorable conditions and provides verification of such, and (4) the employee notifies the Company of his/her intent to return to work, and returns to employment in a timely manner, as described below.

If an individual is eligible to be re-employed, he/she will be restored to the job and benefits the individual would have attained if he/she had not been absent due to military service or, in some cases, to a comparable position (see below).

Notice Requirements of Intent to Return to Work

A former employee must notify the Company of his/her intent to return to work promptly following completion of Service. The Uniformed Services Employment and Reemployment Rights Act require employees returning from Service to notify their employer and report to work within the following specified time periods:

If the employee served 1 to 30 days (less than 31 calendar days), or was away from employment for purposes of a military readiness physical examination, he/she must return to work at the beginning of the first day of the next regularly scheduled work period following the completion of Service. If this is impossible or unreasonable through no fault of the employee, he/she must return to work as soon as possible.

If the employee served 31 to 180 calendar days, he/she must submit an application for reemployment to the Company within 14 days after completion of Service, or as soon as possible if the failure to make a timely application is through no fault of the employee.

If the employee served 181 calendar days or more, the employee must submit an application for re-employment to the Company within 90 days after completion of Service.

If Service was for more than 30 days, the returning employee must submit, along with his/her application for re-employment, written documentation establishing that (1) the employee's application for return to work is timely, (2) the employee's cumulative

Service has not exceeded 5 years, and (3) the employee has not been terminated from Service due to dishonorable or bad conduct discharge.



Returning employees who are hospitalized for, or recovering from, injuries incurred or aggravated by Service may apply for re-employment within 2 years following recovery from such injuries. Such employees may return, within 2 years following recovery, when able to perform their essential job functions, with or without reasonable accommodations. Employees who are unable to return to work do not receive pay from the Company until they do return.

Failure to Give Timely Notice

Failure to report or apply for re-employment within the appropriate time periods set forth above will subject the employee to disciplinary action, up to and including termination of employment, based on the Company's standard policies for unexcused absences. Individuals returning from a Service commitment may not be automatically terminated for failure to report on time, but will be held to the Company's standards for unexcused absences from work.

Re-employment Rights

USERRA entitles an employee returning from Service to all seniority and other rights and benefits determined by the seniority the employee had prior to the commencement of military Service. The employee is also entitled to any seniority and related benefits that he/she would have attained if continuously employed. In addition, employees fulfilling a Service commitment are entitled to other rights and benefits not determined by seniority, if the Company offers these benefits to employees on furloughs or leaves of absence.

Upon return from Service, an employee will be entitled to reinstatement to a particular position in the following manner:

Service of 90 days or less: An employee returning from Service is entitled to employment in the position which he/she held immediately prior to military leave, or the position in which he/she would have been employed if employment had not been interrupted by military leave.

More than 90 days of Service: An employee returning from Service of more than 90 days is entitled to return to the position which he/she held immediately prior to military leave; the position in which he/she would have been employed if employment had not been interrupted; or a position of like seniority, status, and pay, the duties of which the returning employee is qualified to perform after reasonable efforts by the Company to qualify him/her.

The Company will make reasonable efforts to train a returning employee in order to refresh or upgrade his/her skills and abilities, in an effort to qualify the employee for reemployment in the position he/she would have held if employment had not been interrupted by Service. The Company will make reasonable accommodations to qualified employees who are disabled during military Service to allow them to perform their essential job functions.

The Company is not required to re-employ an individual returning from Service if circumstances have changed sufficiently so that re-employment is not possible, reasonable, or would pose an undue hardship on the Company. In addition, if a Company employee was employed for a temporary or brief, non-recurrent period, with no reasonable



expectation that such employment would continue indefinitely or for a significant period, no re-employment will be granted.

Benefits Upon Return to Work

Individuals who are eligible to return to work, and return to work within prescribed time limits are eligible for certain benefits. Upon re-employment, a waiting period will not be imposed on a returning full-time employee in connection with the reinstatement of health insurance coverage or other fringe benefits for which the employee was eligible prior to military leave. Pre-existing condition exclusions will not be imposed in connection with health insurance coverage as required by USERRA. A returning employee is eligible for health insurance coverage through the Company's plan without a waiting period even if he/she did not elect to continue health insurance coverage while on leave. A returning employee will not be treated as having incurred a "break in service" with the Company for purposes of eligibility for participation in the Retirement Plan. Military service will be considered as full-time service for a returning full-time employee, for purposes of determining the date the employee becomes (became) eligible for a Company contribution to the Retirement Plan. Retirement Plan contributions made on behalf of an eligible employee will begin upon re-employment. Upon timely return to work from Service, the Company will make contributions to the Retirement Plan for eligible employees equal to those employer contributions which would have been made but for military leave. Plan contributions will be based on the rate the employee would have received but for the military leave.

Employment Practices

The Company will not discriminate or retaliate against an employee or job applicant because he/she is a past or present member of the Uniformed Services, has applied for membership in the Uniformed Services, or is obligated to serve in the Uniformed Services. The Company will not discriminate in its hiring or employment practices. In addition, the Company will not retaliate against anyone assisting in the enforcement of

USERRA rights, including testifying or making a statement in connection with a proceeding under USERRA.

Questions about USERRA may be directed to Human Resources.

Federal USERRA Notice

Federal law requires employers to notify employees of their rights under USERRA, and employers may meet this requirement by displaying the USERRA notice where they customarily place notices for employees. Employees may contact Human

Resources for a copy of the USERRA notice or to find out the location of the posted USERRA notice.

Employees may obtain information about USERRA through the Department of Labor web site at www.dol.gov/elaws/vets/userra/



If any employee feels his/her USERRA rights have been violated or the Company is not properly applying provisions of USERRA, he/she should promptly notify the Human Resources.

EXCEPTIONS

Exceptions require the approval of the General Manager and the subsidiary Human Resources Director. For Corporate employees, approval by the President and Corporate Human Resources Director is required.

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	CEO/President	05/01/2011



INCLEMENT WEATHER AND UNAVOIDABLE LEAVE

UIC-HR-2-6-038 Rev 1

PURPOSE

The purpose of this policy is to provide time off for employees who are unable to work in the event of severe inclement weather conditions and other emergencies.

ELIGIBILITY

This policy applies to all employees, except those working in the UIC Government Services group of companies. All regular and full-time employees who work at least 32 hours per week are eligible for paid time off under this policy, up to three paid work days per calendar year.

UIC Government Services employees are not eligible for paid leave under the Inclement Weather Policy. In the event of a weather related closure those employees should consult with their managers for various options such as recording PTO, teleworking, modified work schedules or other means.

POLICY

The Company's offices, worksites and those of our government or contractor provided facilities are generally not closed except for severe inclement weather conditions and other emergencies.

For those employees working at government-provided facilities, there may be instances where the government closes the facility, even for non-weather related events, and either prevents employees from reporting to work or requires that they leave the government work site. The policy's provisions anticipate that to the extent practical given advance weather forecasts, employees may, if the customer permits, coordinate contingency plans with their supervisor in advance, e.g., taking work from the office that can be performed at the employee's home.

In circumstances where employees are unable to travel as a result of weather conditions which impact their safety even when the workplace remains open, employees should talk with their supervisor as soon as practical. For some roles and within agreements with customers, contingency plans may accommodate work from home. In situations where employees are unable to work from home or not able to work on company or customer work sites, employees should record the full or partial day to PTO or leave without pay.

Exempt employees who work a partial day will be paid for a full day and should record hours worked and the remainder of the workday to the Inclement Leave charge code. Exempt employees who miss an entire day of work should charge their time to the Inclement Weather charge code.

Non-exempt employees may make up time during their current work day or work week, depending upon the state laws governing time reporting.

PRINTED COPIES ARE NOT CONTROLLED



Non-exempt employees receive overtime pay for hours worked in excess of federal or state wage and hour laws. Overtime pay is based on the actual hours worked, whereby the employee receives one and one-half times their hourly rate for all authorized time worked in excess of 40

hours per week, and in some states in excess of 8 hours per day. Paid time off is not counted as hours worked for calculating overtime pay.

In order for time to be charged to Inclement Weather, the day must be declared by the General Manager as an Inclement Weather day.

When offices, worksites, or customer workplaces are closed, employees will be paid up to three work days per calendar year.

EXCEPTIONS

Exceptions require the approval of the General Manager and the subsidiary Human Resources Director. For Corporate employees, approval by the President and Corporate Human Resources Director is required.

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	CEO/President	03/01/2011
01	UIC GS exemption of paid leave	UIC HR	CEO/President	01/24/2017



ABSENT WITHOUT LEAVE

UIC-HR-2-6-039 Rev 0

PURPOSE

The purpose of this policy is to define the consequences when an employee fails to report to work without notifying their supervisor.

ELIGIBILITY

This policy applies to all employees.

POLICY

If an employee is absent for any length of time from his/her position without prior approval, he or she may be considered Absent Without Leave (AWOL) and subject to disciplinary procedures, including termination.

An employee who fails to report to work or has not notified the supervisor regarding an absence may be considered AWOL and may be presumed to have resigned after one working day. Management may consider extenuating circumstances when determining discipline for a no call/no show (for instance, if the employee is in a serious accident and is hospitalized) and has the authority to exercise discretion in such cases.

EXCEPTIONS

Exceptions require the approval of the General Manager and the subsidiary Human Resources Director. For Corporate employees, approval by the President and Corporate Human Resources Director is required.

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	CEO/President	05/01/2011
01	Updated to align with Attendance Policy	UIC HR	VP HR	8/23/2013



LEAVE WITHOUT PAY

UIC-HR-2-6-007 Rev 0

PURPOSE

The purpose of this policy is to allow employees to take unpaid time off in specific situations when paid leave does not apply or Paid Leave has been exhausted. Separate policies address any situation covered under Military Leave, the Family Medical Leave Act, and Short-Term Disability.

ELIGIBILITY

This policy applies to all employees.

POLICY

The Company may grant up to an additional thirty (30) days unpaid leave after employees have exhausted available paid leave accrual for certain situations.

Leave Without Pay (LWOP) must be approved by the supervisor and the Subsidiary HR Director. The Company reserves the right to grant or deny a request and to investigate the request before or after approval.

Approved LWOP is not considered a break in service however PTO will not accrue during this period except where required by law.

If the unpaid leave is for an extended period of time (more than 30 days), the Company may, or may not, hold the employee's position vacant. If the Company does not hold the position vacant, at the time the employee is available to return the work, the Company will attempt to identify a suitable position for the employee. If the company is unable to find a suitable position, the employee will be terminated.

Upon return to active employment following a leave of absence, employees must obtain supervisor approval. If employees do not return to work at the expiration of the leave, they are considered to have voluntarily resigned and their employment will be terminated. If an employee accepts other employment while on a leave of absence, they will be considered to have voluntarily resigned from the company.

ACCRUAL OF BENEFITS AND SERVICE DURING UNPAID LEAVES

Except as otherwise provided under the Military Leave and Family and Medical Leave provisions:

Service accrues for up to a maximum of thirty days of unpaid leave during any 12-month period.

Employees that have paid time during a pay period will accrue PTO during that pay period. Employees that do not have paid time during a pay period will not accrue PTO for that pay period.



If the employee continues to pay his/her portion of the monthly insurance premium for the first thirty days of the unpaid leave, the Company will continue its contribution (as applicable) toward the insurance benefit program. After thirty days of unpaid leave, the employee may be terminated and is eligible for COBRA.

EXCEPTIONS

Exceptions require the approval of the General Manager and the subsidiary Human Resources Director. For Corporate employees, approval by the President and Corporate Human Resources Director is required.

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	CEO/President	03/15/2011



SUBSISTENCE LEAVE

UIC-HR-2-6-008 Rev 1

PURPOSE

The purpose of this policy is to support Alaska's subsistence culture by providing eligible employees with dedicated leave to pursue subsistence activities in Alaska.

ELIGIBILITY

All Alaska-based regular, full-time employees pursuing bona-fide subsistence activities in Alaska are eligible.

POLICY & PROCEDURE

Eligible employees may take up to two (2) weeks (80 hours) of unpaid Subsistence Leave each calendar year. Subsistence Leave may be used solely to pursue subsistence activities in Alaska. Bona fide subsistence activities are limited to fishing, hunting, gathering, and related activities. Like recreational activities are not eligible for Subsistence Leave.

Employees hired mid-year will receive a prorated allowance.

Employees may use Subsistence Leave to complement regular PTO, and are not required to deplete their PTO balances before using Subsistence Leave.

Employees must comply with the approval and scheduling requirements in UIC's Paid Leave Policy before taking Subsistence Leave. Employees taking Subsistence Leave are required to use the associated Subsistence Leave code in the timekeeping system.

Subsistence Leave has no cash value. It may be used solely as unpaid leave for the purpose of pursuing subsistence activities. It may not be cashed out during employment or at separation.

Unused Subsistence Leave balances will not rollover from year to year.

EXCEPTIONS

Exceptions generally will not be granted and would require the approval of the General Manager and Corporate HR Director.

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	CEO/President	03/15/2011
01	Revision to Policy	UIC HR	CEO/President	01/03/2012

REVISION HISTORY

PRINTED COPIES ARE NOT CONTROLLED



FAMILY AND MEDICAL LEAVE

UIC-HR-2-6-053 Rev. 1

PURPOSE

The purpose of this policy is to provide time off for employees experiencing a qualifying illness or condition, or caring for a family member experiencing a qualifying illness or condition, in accordance with the Family Medical Leave Act (FMLA).

SCOPE

This policy applies to Ukpeaġvik Iñupiat Corporation, its holding companies, and subsidiaries.

POLICY

This policy is in strict accordance with the FMLA, please refer to the FMLA regulations for specific requirements.

FMLA leave may be taken for a period of up to twelve (12) work weeks (or up to twenty-six (26) work weeks of military caregiver leave to care for a covered service member with a serious injury or illness) for any of the following reasons:

- The birth of the employee's child;
- The placement of a newly adopted or foster child;
- The need to care for the employee's child within a twelve (12) month period from birth or placement;
- The care of an immediate family member with a 'serious health condition';
- The employee's own 'serious health condition';
- Qualified exigency leave related to an immediate family member who is on active duty or called to active duty; or
- Military caregiver leave to care for a member of the immediate family or next of kin who is seriously injured or ill while on active duty. Military caregiver leave may last up to 26 weeks.

Leave Entitlement

- Employees are entitled to FMLA if they:
 - Have been employed by the Company at least twelve (12) months, and
 - Have worked at least 1,250 hours during the rolling twelve month period immediately preceding commencement of the requested leave, and
 - Have not exhausted all available FMLA in the previous twelve months from the date the requested leave will begin, and



- o Have a qualifying event, and
- Work at a location in the United States or in any territory or possession of the United States where at least 50 employees are employed by the employer within 75 miles.

Employees are entitled to a maximum of twelve (12) workweeks (480 hours) of FMLA leave within a rolling twelve (12) month period. FMLA leave can be taken continuously over the course of a rolling twelve-month period.

While the twelve (12) months of employment need not be consecutive, employment periods prior to a break in service of seven years or more need not be counted unless the break is occasioned by the employee's fulfillment of his or her National Guard or Reserve military obligation (as protected under the Uniformed Services Employment and Reemployment Rights Act (USERRA), or a written agreement, including collective bargaining agreement, exists concerning the employer's intention to rehire the employee after the break in service.

The actual FMLA leave entitlement shall be based on the employee's percentage of full time work for the rolling twelve (12) month period immediately prior to the beginning date of the FMLA leave; and shall consider the amount of other leave taken during the rolling twelve (12) month period prior to when the FMLA leave is to begin.

Employees who regularly worked 40 hours per week are entitled to a maximum of twelve (12) workweeks (480 hours) of FMLA leave in a rolling twelve (12) month period. Employees, who have worked less than 40 hours per week, on at least a 50% basis, are entitled to a prorated share of the twelve (12) weeks/ (480 hours maximum). For example, employees who work a regular schedule of thirty-two (32) hours per week would be eligible for 80% of the 480 hours, which is 384 hours.

When both husband and wife work for the same employer, the amount of leave allowed under the Family and Medical Leave Act is limited to an aggregate of twelve (12) weeks for "bonding" – the birth, adoption, or foster care placement of a child. However, if the leave is for the care of a sick child, to care for the other spouse, or for the employee's own serious health condition, each spouse is allowed twelve (12) weeks' of leave. Spouses employed by the same employer are limited to a combined total of 26 workweeks in a "single 12-month period" if the leave is to care for a service member.

Application for Leave:

FMLA leave must be requested in writing and the request approved prior to taking the leave. In absence of a request, the Company designates all qualifying leaves as FMLA leave, regardless of whether or not the employee has provided



appropriate notice or submitted a timely request for FMLA leave. There is a specific application process that is required by the Family Medical Leave Act, and a copy of these requirements, and associated forms, are available from Human Resources. All information required on the forms must be provided.

The employee must provide a Certification of Healthcare Provider form to make the employer aware of the need for FMLA leave and the anticipated timing and duration of leave. When an employee seeks leave due to a FMLA-qualifying reason for which the employer has previously provided the employee FMLAprotected leave, the employee must specifically reference either the qualifying reason for leave or the need for FMLA leave. If an employee fails to turn in documentation supporting their FMLA request for leave, their request may be denied and they may be subjected to termination.

If the reason for FMLA is foreseeable, an employee must give at least thirty (30) calendar days' notice and provide the appropriate medical certification or legal certification of adoption (as soon as practicable) or foster child replacement, before taking FMLA leave. When the need for leave is foreseeable, but 30 days' notice is not practicable, an employee shall give notice as soon as practicable, which means immediately or within one business day, in accordance with the Company's absence policy and procedure.

The Company may inquire as to why providing 30 days' notice was not practical. If a leave is unforeseeable, as in a medical emergency, then the employee or the employee's designee must notify the company on the same day or next business day, in accordance with the Company's absence policy and procedure.

In cases where the Company designates leave as FMLA leave due to an employee's own serious health condition, the Company will advise the employee that a Fitness for Duty certification will be required.

The Company will notify the employee that the leave designated will be counted as FMLA leave. The Company must designate leave that qualifies as both leave to care for a covered service-member with a serious health injury, and leave to care for a qualifying family with a serious health condition, as leave to care for a covered service-member in the first instance. The designation notice will be provided be in writing, and generally must be given within five (5) business days of the determination in accordance with FMLA

Benefits and Compensation

During FMLA leave, the Company will maintain the employee's existing benefits elections. The Company will continue to pay the Company-paid portion of the contributions, and collect the employee-paid portion either when the employee

PRINTED COPIES ARE NOT CONTROLLED

Page 125 of 167



returns to work, or by direct payment by the employee to the Company. The Company will recover its share of health premiums during FMLA leave if the employee fails to return to work, or returns to work but fails to stay thirty (30) calendar days, unless the reason for not returning or staying is due to the continuation, recurrence, or onset of a serious health condition or other circumstances beyond the employee's control.

FMLA is unpaid leave. An employee on approved FMLA may record Leave Without Pay (LWOP) in hourly increments and is not required to exhaust Paid Time Off (PTO) prior to recording LWOP; however, until the request for FMLA is approved, the employee must use PTO. While on unpaid FMLA leave, the employee will not accrue PTO or other leave benefits, including holiday pay.

Certification of Physician or Practitioner

For leaves related to serious health conditions and to childbirth, the employee may be

requested to submit a medical certification form to the Company within fifteen (15) days unless not practicable to do so despite the employee's diligent efforts. This form is available from Human Resources. Medical recertification may be required of the employee every thirty (30) days, unless circumstances dictate more frequent recertification. An employee on intermittent leave must submit recertification every six (6) months. Medical certification and recertification is at employee expense.

The Company can require second and/or third medical opinions, at Company expense, when it has questions or concerns about the medical certification or recertification provided by the employee.

Other Employment

It is the policy of the Company that employees on FMLA leave may not work a second job for another employer.

Medical Treatment and Appointments

Employees are expected to schedule medical treatment and other medical appointments around their work shift, to the maximum extent possible.

Intermittent Leave

The Company reserves the right to assign an employee on intermittent or reduced leave to an alternate job during the leave period. A temporary reassignment may occur if the intermittent leave schedule prohibits effective performance of the employee's regular job. The temporary reassignment will not impact the employee's use of intermittent leave.



Reinstatement

Employees must notify HR and/or their supervisors at least three (3) business days prior to their return to work. The Company will reinstate employees who timely return from FMLA leave to the same or equivalent position with the equivalent pay and benefits. However, reinstatement to a position is not required if:

- The employee had been hired for a specific term or for a specific project, as defined in writing, and that term or project has completed and the Company would not otherwise continue to employ the employee, or
- There are reductions in the workforce while the employee is on leave and the employee would have lost his/her position had the employee not been on leave, or
- The employee is a key employee and reinstatement will result in substantial and grievous economic injury to the Company. Restoration may be denied to a key employee only if the employee was notified of his/her status as a key employee at the time the leave was requested or commenced, whichever was earlier, and of the potential consequences with respect to job restoration and maintenance of health benefits. A key employee means a salaried FMLA employee who is among the highest paid ten (10) percent of all the employees employed by the Company within 75 miles of the eligible employee's workplace.
- An employee has no greater right to restoration or to other benefits and conditions of employment than if the employee had been continuously employed.

Fitness For Duty

The employee will be required to submit a fitness for duty certificate from a licensed health care practitioner prior to returning to work from FMLA leave where that leave was necessitated by the serious health condition of the employee. If this certification is not received, the employee's return to work may be delayed until the certification is provided. Failure to provide the certification may result in corrective action, up to and including termination.

Providing Information for Leave

Regardless of the reason for the leave, an employee shall provide complete, accurate and timely information related to a request for continuation of, modification to, and return from FMLA leave.

Violations

Abuse or misuse of FMLA leave is fraud and will result in termination of employment. It is unlawful for the company to interfere with, restrain, or deny the



exercise of any right provided by FMLA. It is also unlawful for an employer to discharge or discriminate against any individual for opposing any practice, or because of involvement in any proceeding, related to FMLA.

THE FOLLOWING DEFINITIONS APPLY TO FMLA

Serious health condition:

An illness, injury, impairment, or physical or mental condition that involves:

- In-patient care in a hospital, hospice, or residential medical care facility, home care, or
- Continuing treatment by a health care provider. "Treatment" means at least two in-person visits, with the first visit within seven (7) days following the onset of the condition and the second visit within thirty (30) days thereafter; any period of incapacity or treatment for a chronic serious health condition which continues over an extended period of time, requires periodic visits (at least twice a year) to a health care provider, and may involve occasional episodes of incapacity. A visit to a health care provider is not necessary for each absence; or a period of incapacity that is permanent or long-term due to a condition for which treatment may not be effective. Only supervision by a health care provider is required, rather than active treatment, or any absences to receive multiple treatments for restorative surgery or for a condition that would likely result in a period of incapacity of more than three (3) days if not treated.
- A "serious health condition" means conditions or illnesses that require an absence of at least three days for treatment or recovery. FMLA leave is not intended to cover absences that last less than three days or short-term medical and/or surgical procedures with a brief recovery period of less than three days, which are normally handled through use of PTO. With respect to an eligible employee, a serious health condition means that the employee must be incapacitated from performing the essential functions of his/her position.

Immediate Family Member

The employee's parent(s), spouse, child(ren) or legal dependent(s). For purposes of military caregiver leave only, leave is also available for "next of kin," meaning the employee's closest living relative who is a spouse, child, or parent. The Company may request that an employee provide reasonable documentation of the qualifying family relationship.

EXCEPTIONS

There are no exceptions to this policy, except where local and/or state laws may differ and provide additional protections. Some state and federal laws may provide additional coverage and eligibility.



Revision	Change Description	Author / Revised By	Approved By	Effective Date
0	Original issue	UIC HR	CEO/President Anthony Edwardsen	5/17/2012
1	Policy Edits to comply with federal guidelines	Corporate Sr. Director of HR, Jennifer Reichelt	CEO/President Delbert Rexford SOF	9/19/2018



SICK LEAVE WITH PAY: FEDERAL CONTRACTORS

UIC-HR-2-6-087 Rev. 1

PURPOSE

In accordance with Executive Order 13706, the purpose of this policy is to provide Paid Sick Leave for Employees who work on Federal contracts that have incorporated the Paid Sick Leave Federal Acquisition Regulation (FAR) clause 48 CFR 52.222-62 in their contract with the Federal government.

SCOPE

Executive Order 13706 applies to new contracts and replace:

- 1. A procurement contract for construction covered by the Davis-Bacon Act (DBA)
- 2. A contract for services covered by the Service Contract Act (SCA)
- A contract for concessions, including any concessions contract excluded for coverage under the SCA by Department of Labor regulations at 29 CFR 4.133(b)
- 4. A contract in connection with Federal property or lands and related to offering services for Federal employees, their dependents, or the general public.

The regulations will not apply to contracts for the manufacturing or furnishing of materials, supplies, articles, or equipment to the Federal Government that are subject to the Walsh-Healey Public Contracts Act. The government's Contracting Officer must incorporate the 48 CFR 52.222-62 of the FAR in the contract issued to the Company.

Employees should talk with their supervisor to receive a listing of contract specific benefits and may obtain information about Executive Order 13706 through the Department of Labor website at <u>https://www.dol.gov</u>

POLICY STATEMENT

The Company provides paid sick leave in accordance with Executive Order 13706.

Company Paid Time Off

Employees who are covered by the Service Contract Act (SCA) or Davis Bacon Act (DBA), and are in effect paid in accordance with the DOL Wage Determination (WD), will receive the mandated paid sick leave in addition to the vacation accruals listed in their applicable WD. The current accrual is one hour of



leave for 30 hours worked with a maximum of 56 hours. This leave may only be used for the reasons prescribed in the regulation and will not be cashed out upon termination. Please refer to the regulation for full details.

Non- SCA/DBA employees will continue to benefit from the company's standard PTO accrual which provides them flexibility and leave allotments for both vacation and sick leave. Please refer to the Paid Time Off Policy addendum to determine employees accrual rate provided to you from the company

EXCEPTIONS

Any exceptions to this policy will require the approval of the subsidiary or Corporate Human Resources Director.

Revision	Change Description	Author / Revised By	Approved By	Effective Date
1	Original issue	Corporate Sr. Director of HR, Jennifer Reichelt	CEO/President Delbert J. Rexford SOF	7/26/2018



EMPLOYEE PERFORMANCE MANAGEMENT

UIC-HR-2-6-066 Rev 0

POLICY

Performance Management is a year-round process requiring supervisors to plan, coach, and evaluate employees in order to improve individual and organizational performance. The Company provides a uniform methodology to align Company and individual goals and objectives, set performance expectations, establish accountability, objectively evaluate the employee's performance, and create a framework for developmental opportunities.

ELIGIBILITY

ACTIVE EMPLOYEES

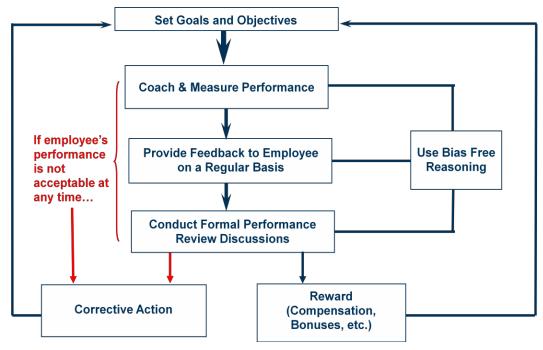
This Policy applies to all active employees.

NEWLY HIRED EMPLOYEES

Employees hired after October 1 will receive their first formal performance review during the next year's review cycle.

GUIDELINES

The Performance Management Cycle



PRINTED COPIES ARE NOT CONTROLLED



The Performance Management Cycle

The Performance Management cycle begins at the first of the year. Each supervisor is responsible for meeting with their employees to discuss job expectations and set goals and objectives against which they will be evaluated at the end of the calendar year. Goals and objectives should be aligned with the Company Goals as well as the employee's Department/Division Goals, contract/SOW and, individual job duties.

Although the formal performance review is at the end of the calendar year, good supervisory practices ensure employees are routinely advised throughout the year regarding their performance, strengths and weaknesses, and their progress toward preestablished goals and objectives. In view of this, the employee's overall performance rating should not be a surprise to the employee on the day of the written appraisal.

Should the supervisor believe the employee is experiencing problems at any time during the year, or it becomes apparent that the employee has the potential to receive an unsatisfactory rating, the supervisor should consult with Human Resources

At the end of the calendar year, the supervisor formally evaluates his/her employees based on the goals and objectives set at the beginning of the performance management cycle. Employees are evaluated on the following scale:

- **Outstanding:** Substantially and consistently surpasses corporate/client standards and job expectations. Works independently, demonstrating a high degree of initiative, customer service, and quality work. Actively suggests and implements opportunities to improve products, services, and processes. Recognized and sought out for knowledge and expertise. Frequently contributes outside the normal responsibilities of their position. *Few employees achieve this level of performance, and, when they do, their contribution is clearly recognized by employees within and beyond their group.*
- **Exceeds:** Routinely exceeds corporate/client standards and job expectations. Works independently, demonstrating initiative, timeliness of results, customer service, and quality work. Consistently develops and implements challenging work goals. *This rating is reserved for those individuals whose performance contributions are consistently above expectations and clearly obvious to those who know their work.*
- **Successful:** Performance meets and occasionally surpasses corporate/client standards and job expectations. Requires limited direction. Demonstrates and executes at their full capability for all responsibilities given. Displays a good balance between quality and quantity of work completed. *This is a solid level of performance and represents the backbone of the company.*
- **Needs Improvement:** Performance is not fully satisfactory. Inconsistent performance with expectations only partially achieved. Meets many of the expectations of the job in a satisfactory manner, but often fails to



adequately meet some of the expectations and corporate/client standards. Need for further development and improvement is required. *Employee*

should have a written performance improvement plan with frequent formal feedback, if overall rating is Needs Improvement.

Does Not Meet: Performance is consistently not meeting the key job requirements. Employee's task prioritization and completion is not consistent with the corporate/client standards and job expectations. Requires close direction to complete projects and assigned work. Calls for immediate and sustained performance improvement.

Any employee receiving an overall rating of 'Needs Improvement' or 'Does Not Meet' on their annual performance evaluation will be placed on a Performance Improvement Plan (PIP) to help them improve their performance. Employees placed on a PIP are not eligible for salary increases, bonuses, or promotions.

Transfers, Promotions, Organizational and Supervisor Changes

Should an employee transfer departments, be assigned a new supervisor, or change job functions, the employee's previously established goals and objectives should be updated or closed out and new goals and objectives should be established.

Anytime an employee begins reporting to a new supervisor, whether the employee transfers departments or is assigned a new supervisor, the employee should update his/her previously established goals and objectives and provide those updates to the former supervisor for final review. The former supervisor should evaluate the employee on his/her progress toward the previously established goals up to that point in the performance cycle and forward them to the new supervisor, prior to the supervisor change, in order for the employee to be fairly evaluated at the end of the performance cycle.

- If an employee transfers jobs and in turn reports to a new supervisor, the new supervisor and employee should set new goals and objectives based on the employee's new duties.
- If a supervisor is leaving a supervisory position or the Company, the new supervisor, upon entering the new role, should meet with the employee to review the employee's previously established goals and objectives to gain an understanding of them and make any adjustments as he/she sees fit.
- If an employee is promoted into a new job function but does not change supervisors, the supervisor and employee should reevaluate the previously established goals and objectives to ensure they are still relevant in regards to the employee's new position. If they are no longer relevant, the employee and supervisor should collaborate to adjust the goals and objectives accordingly. The previously established goals and objectives should be updated with the employee's progress up to that point in the performance cycle and should be considered when evaluating the employee at the end of the performance cycle.



Out-of-Cycle Appraisals

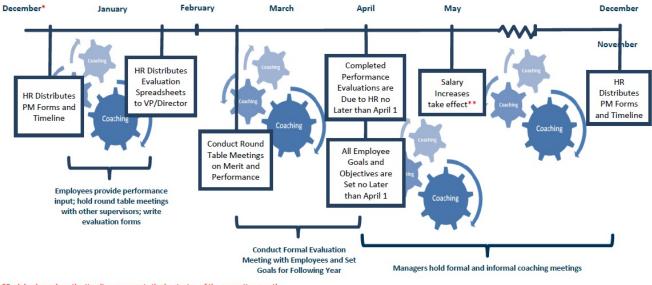
Special, out-of-cycle appraisals may be scheduled in certain circumstances, for example:

If the employee is experiencing performance problems or was marginally rated in the last appraisal.

To review/establish progress in accomplishing specific objectives.

PROCEDURE

The Performance Management Annual Timeline



*Each hash mark on the timeline represents the beginning of the respective month **Direct billed employees may be subject to a different timeline

Planning: Setting Goals and Objectives

The supervisor is to collaborate with the employee to set goals and objectives within the first two months of the performance cycle.

New employees and employees transferring into a new job function should set goals and objectives with their supervisor within 45 days of employment or new job assignment.

Goals should be aligned to Company Goals as well as to the employee's job duties. Developmental goals should be set at this time as well.

All goals should be SMART goals: Specific, Measurable, Accountable, Reasonable, and Time-bound.

Goals are to be documented on the Performance Management Form.

Employee and supervisor should sign the Performance Management Form agreeing to the goals set.



If changes occur during the year, it may be appropriate to adjust previously set goals.

Performance Management Forms are kept on file by the supervisor until the end of the performance cycle at which time the supervisor evaluates the employee on his/her progress toward his/her goals.

Employees should maintain an electronic copy of the Performance Management Form and record their progress toward their goals during the year in the results box.

Coaching

Supervisor observes and documents employee performance throughout the performance cycle.

Supervisor should occasionally meet with employee, formally and informally, for updates on progress toward goals and provide performance feedback to employee. It is especially important that newly hired employees receive frequent coaching and check-ins during the first few months of employment.

Employees with outstanding performance should be recognized accordingly.

Consult with Human Resources if employee is not meeting performance expectations.

Reviewing

Employees are encouraged to actively participate in their performance evaluations and should provide their supervisor with updates on progress toward goals and objectives.

Supervisors may request employees submit a self-evaluation to have an understanding of the employee's perception of his/her performance.

Employees are strongly encouraged to submit updated resumes annually in s u p p or t of t h e C o m p a n y's contract proposal efforts. Employee resumes are submitted to clients and potential clients as a way of demonstrating organizational capabilities. In addition, resumes may be searched throughout the year for particular competencies in response to specific requests by teaming partners or government agencies. Note: resume submittals may be a requirement at certain subsidiaries.

Supervisor determines if employee met set goals and objectives and completes the evaluation portion of the Performance Management Form.

The supervisor may also consult with the customer, clients, and/or other managers regarding the employee's performance.

Supervisor provides performance rating recommendations to VP/Director.

The Division/Department Vice President or Director completes Evaluation

Spreadsheets and sends to Human Resources.

PRINTED COPIES ARE NOT CONTROLLED



Human Resources analyzes data and prepares for Performance Review Meeting.

The Division/Department Vice President or Director presents performance rating recommendations to Human Resources and the Company President.

The Division/Department Vice President or Director notifies supervisors of approval of recommendations.

Upon receiving approval from the Division/Department Vice President or Director supervisor conducts formal Performance Review session with employees.

- Employee is given an opportunity to provide additional data, comments, or rebuttal on the Performance Management Form. If the employee does not want to raise an issue with the next level of management, the employee may discuss the issue(s) with Human Resources.
- Employee, supervisor, a n d approving m a n a g e r sign Performance Management Form after review is conducted.

Employee signature does <u>not</u> indicate that the employee agrees with the review but just that the employee received the review.

- The original signed Employee Performance Evaluation is filed in Human Resources with the employee's personnel file and a copy of the Employee Performance Evaluation is provided to the employee by the supervisor.
- Employee and supervisor work together to set goals and objectives for the following year.

RESPONSIBILITIES

Employees

The employee is responsible for collaborating with the supervisor to set goals and objectives and achieving an understanding and agreement to those goals and objectives.

The employee is responsible for providing the supervisor with progress reports throughout the performance cycle.

If the employee begins reporting to a new supervisor in the middle of a performance cycle, the employee is responsible for providing a progress report to the old supervisor prior to changing supervisors.

The employee is responsible for soliciting guidance and feedback from the supervisor when needed.

If requested by the supervisor, the employee may be responsible for providing a self-assessment.

<u>Supervisors</u>

Supervisors should exercise fairness and equitable treatment among those employees reporting to them.



The supervisor is responsible for communicating Business Goals and Departmental Goals to employee prior to the planning meeting.

After collaborating with the employee, it is the supervisor's responsibility to establish the final goals and objectives, training needs, and development needs of the employee.

If the supervisor gains a current Company employee in the middle of the performance cycle:

The former supervisor should evaluate the employee on his/her progress toward those goals through that point in the performance cycle.

The new supervisor should ensure that he/she receives the employee's updated goals and objectives from the former supervisor.

If a supervisor leaves the Company, it is that supervisor's responsibility to evaluate the employees their progress toward their goals prior to his/her departure.

The supervisor is responsible for coaching the employee and providing ongoing feedback to the employee regarding his/her performance.

The supervisor is responsible for evaluating the employee's performance according to pre-established criteria, requirements of the job description, customer satisfaction, and/or other appropriate criteria determined by the supervisor and explained to the employee.

Evaluating the employee includes:

Completing the correct Performance Management Forms. Recommending performance ratings to the VP/Director prior to Performance Review Meeting.

Conducting the formal review meeting with the employee.

Receiving the appropriate approvals and sending completed Performance Management Forms to Human Resources prior to the deadline.

Supervisors are responsible for ensuring all performance management deadlines, including employee submitting performance management forms, are met.

Approving Manager

The approving manager is responsible for ensuring that the Company Goals have been communicated to all supervisors.

The approving manager is responsible for examining Performance Management Forms to ensure goals are appropriate and do not conflict across individuals or groups.

The approving manager is responsible for ensuring that all Performance Management Forms are completed and turned into Human Resources on time.



Approving Managers are responsible for ensuring all performance management deadlines, including submitting performance management forms, are met.

Division/Department Vice President/Director

The Division/Department Vice President/Director is responsible for attending Performance Review Meeting and notifying supervisors of approval to move forward with formal review sessions.

The Division/Department Vice President/Director is responsible for ensuring that all Performance Management Forms from his/her division/department are completed and turned into Human Resources on time.

Division/Department Vice President/Directors are responsible for ensuring all performance management deadlines, including submitting performance management forms, are met.

Human Resources

Human Resources is responsible for updating the Performance Management Policy, maintaining all Performance Management Forms and providing supervisors with the annual Performance Management timeline.

Human Resources is responsible for collecting and filing all Performance Management Forms and analyzing performance ratings and salary increase recommendation data for Performance Rating and Salary Review Meetings.

Human Resources provides on-going assistance and counsel to supervisors in resolving performance concerns.

EXCEPTIONS

Exceptions to this Policy require prior approval of the President.

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	CEO/President	12/17/2010



CORRECTIVE ACTION

UIC-HR-2-6-026 Rev 1

PURPOSE

The purpose of this policy is to state the Company's correction action process.

ELIGIBILITY

This policy applies to all employees.

POLICY

Although employment with UIC is based on mutual consent and both the employee and UIC have the right to terminate employment at will, with or without cause or advance notice, UIC may use progressive corrective action at its discretion.

The Company encourages ongoing, open communication between supervisors and employees. When conduct violates Company policies and procedures or when the quality and quantity of work performed does not meet the standards of the job and/or contract requirements documented corrective actions may be necessary to ensure that employees are aligned with the expectations of the company in terms of performance, compliance, and appropriate behavior.

PROGRESSIVE CORRECTIVE ACTION PROCESS

The progressive corrective action process is designed to give the employee the opportunity to improve his/her performance and/or behavior. The steps in the process usually include: documented coaching, written warning, final written warning, and if necessary, termination. All of these steps may be bypassed depending on the unique circumstances of the issue, such as severity and nature of the offense, employee's longevity, etc.

Documented Coaching

Documented coaching sessions may be used to address any performance and/or behavior concerns. The manager should document the discussion with the employee and may choose to use the formal Corrective Action form. When coaching an employee does not prove to be successful, the Company may move to the next step in the progressive corrective action process.

Written Warnings

If the employee's performance does not improve after a coaching session or warrants more severe measures, the supervisor will work with Human Resources to use increasing corrective actions as appropriate, which may include a Written Warning, Final Written Warning, or Performance Improvement Plan.



All performance documentation and warnings will become a permanent part of the employee's personnel file. Provided there have been no other performance or behavior issues within 12 months of issuance of the last corrective action, the documentation may

become inactive. Inactive documents will have less consideration than active documents should the employee's performance need to be addressed on another occasion. If a pattern of chronic behavior becomes apparent, prior inactive documentation may be considered for further corrective action. Some performance documentations and warnings are not eligible to become inactive depending on severity and nature of the offense, including, but not limited to, security violations, workplace violence, and harassment.

Termination

If the employee's performance and/or behavior still does not meet expectations, the employee may be terminated. Depending on the severity of the performance and/or behavior problem, other steps in the progressive action process may be bypassed and the employee may be terminated immediately. Human Resources must be consulted prior to terminating any employee.

Gross Misconduct and Immediate Termination

Gross misconduct is an offense so severe that it warrants immediate termination without previous coaching or warning. Gross misconduct includes, but is not limited to, the following offenses:

- 1. Depending on the nature and extent of the act, violation of the Company's Equal Employment Opportunity or Sexual Harassment Polices.
- 2. Willful or negligent acts that result in: damage to the Company, customer, or another employee's property.
- 3. Willful or negligent acts that negatively affect the Company's competitive position or negatively affect the reputation of the Company.
- 4. Willful or negligent interference with the Company's business relationships with a customer or potential customer.
- 5. Theft, attempted theft, or unauthorized possession of the property of another employee, customer or the Company, regardless of the value.
- 6. Willful disregard of safety rules resulting in bodily harm or destruction of client or company property.
- 7. Possession, consumption, sale, transfer, or being under the influence of a prohibited drug while on Company or customer time or premises and/or with company assets (including company vehicles). The term, "prohibited drug," includes illegal drugs; designer or synthetic drugs that are designed to impair, restrict, or alter normal cognitive function, whether or not illegal; and prescription drugs that are not legally obtained or prescribed, or are not being used for the prescribed purpose, or are being used in excess of the prescribed amount.



- 8. Possession, consumption, or being under the influence of alcoholic beverages while on Company or customer time or premises and/or company or client vehicles.
- 9. Possession or use of dangerous or unauthorized materials such as explosives or lethal weapons on Company or customer property that is not explicitly stated in an employee's job description as a requirement to have or without expressly
- 10. authorized written approval from the employee's holding company's General Manager.
- 11. An employee who fails to report to work or has not notified the supervisor regarding an absence may be considered AWOL and may be presumed to have resigned after one working day.
- 12. Willful falsification of Company records including, but not limited to: timesheets, travel expense reports, employment applications, medical claim forms, and other Company or customer forms or documents.
- 13. Unauthorized dissemination of personal identifying information or improper use of such information.
- 14. Unauthorized dissemination of Company/Client information that is not publicly disclosed or improper use of such information.
- 15. Refusal or failure to carry out a reasonable job assignment or job request after being warned that failure to do so could result in termination.
- 16. Fighting, hitting, pushing, or forcibly grabbing another employee or customer, or other similar physical acts or threats, while on Company or customer premises or in circumstances arising out of Company business relations.
- 17. Failure to report a criminal conviction while employed by the Company.
- 18. Conviction of a felony while employed by the Company.
- 19. Violation of the Conflict of Interest policy.
- 20. Violation of any written condition for hire or other signed employment agreement.
- 21. Marketing another company's services or products in competition with the Company.
- 22. Marketing or performing work in support of personal business during work hours.
- 23. Any behavior that is seriously disruptive of the normal flow of Company business.
- 24. Misconduct toward another employee or other (not Company) personnel on integrated projects.
- 25. Willful violation of security policies.
- 26. Loss of certification or credentials as required by contract (ex. Driver's license, base access, clearance, etc.).
- 27. Misuse of IT systems



28. Violation of UIC Code of Business Ethics and Conduct.

Unacceptable Behavior

Generally, there are three types of transgressions that constitute misconduct: policy and procedure violations, performance issues, and behavior and conduct issues.

These actions and/or behaviors may occur simultaneously and they may be addressed individually or collectively by supervisors. Any resulting disciplinary action is dependent on the nature and severity of the offense(s). Disciplinary action may include a verbal

warning or written warning that would be included in an employee's personnel file. Also, discipline may include administrative leave or suspension up to and including termination.

It is impossible to list every action that is unacceptable conduct. The following list gives some examples:

- 1. Behavior that is counterproductive or failure to effect teamwork and collaboration with fellow employees.
- 2. Insubordination
- 3. Violation of personnel policies
- 4. Unsatisfactory performance or behavior
- 5. Unauthorized use or theft of Company property or assets (e.g. employer-owned equipment, company funds, office supplies)
- 6. Discriminating and harassing behavior toward fellow employee(s) or other persons based on race, gender, age, religion, sex, sexual orientation, national origin, disability or other criteria not related to professional capability or performance.
- 7. Unprofessional or unethical conduct
- 8. Unexcused and/or excessive absences or tardiness
- 9. Falsification of application or employment records including time reports and business expenses
- 10. Hostile and/or disrespectful behavior including disruptive activity, fighting or threatening violence.
- 11. Conduct that leads to damage of Company- or customer-owned property or assets.
- 12. Violation of client or company security procedures

Cleared employees under the purview of the National Industrial Security Program (NISP):

1. Violation of security provisions as contained in the nondisclosure SF312, Security Initial Briefing, and/or company/client site Security Policy and Procedures (SPP)

Employees are required to exercise good judgment and discretion and conduct themselves with the highest standards of ethical conduct in performing the Company's



business and to abide by Company policies and work rules of general conduct and performance at all times.

The Company strives for fair and equitable treatment towards all employees. Each corrective action will be considered on a case-by-case basis and any corrective action that does not follow the procedures set forth in this policy will not be the basis to set aside the corrective action.

EXCEPTIONS

There are no exceptions to this policy.

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	CEO/President	02/06/2013
01	Updated to align with Attendance Policy	UIC HR	VP HR	08/23/2013



GRIEVANCES

UIC-HR-2-6-025 Rev0

PURPOSE

The purpose of this policy is to state the Company's procedures for fair and impartial resolution of employee grievances regarding the employee's work or personal problems that may affect work. This policy does not alter the Company's policy on Employment-at-Will and it does not affect the intent or interpretation of any other Company policies or procedures. The Company shall have the final authority in the resolution of an employee's grievance.

ELIGIBILITY

This policy applies to all employees.

POLICY

Employees are assured that no retribution will be taken against them for raising an issue and that the employee's anonymity will be maintained when requested as appropriate. If an employee has a grievance, issue or question that requires resolution, the following procedure applies:

The employee discusses the problem with the immediate supervisor. If the problem involves the immediate supervisor, then the employee may discuss the problem with the supervisor's supervisor or HR representative.

In the event that the supervisor cannot solve the problem within a reasonable timeframe, the employee may discuss the problem with the next level of management or with an HR representative.

If the problem remains unresolved after another reasonable time period, and at the employee's request, the HR representative will assist in presenting the problem to the next level of management for resolution.

Employees may at any time discuss their concerns with or solicit advice and information from HR. This may be necessary in cases of a personal nature, or in the event the problem involves the immediate supervisor. In emergency situations, this procedure may be accelerated.

EXCEPTIONS

Exceptions require the approval of the subsidiary or Corporate Human Resources Director.

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	CEO/President	04/01/2011



ACCEPTABLE USE

UIC-IT-2-6-008 Rev 1

PURPOSE

The purpose of this Acceptable Use policy is to enable UIC to:

- Outline the acceptable use of its information systems, and
- Set rules to protect UIC and its employees.

Inappropriate use of IT assets and systems exposes UIC to risks including virus attacks, compromise of network systems and services, and legal issues. In general, acceptable use covers everything including respecting the rights of other computer users, the integrity of the physical facilities and all pertinent license and contractual agreements.

SCOPE

This policy applies to all employees, Board of Directors, contractors, consultants, and temporary employees at UIC and its subsidiaries, including all personnel affiliated with third parties, that use the UIC's information systems. This policy applies to all information equipment and assets that are owned or leased by UIC and other information equipment that may be used to access UIC's information systems.

POLICY STATEMENT

The Acceptable Use Policy is to protect its information, assets, and IT resources while reflecting UIC's established culture of openness, trust, and integrity. This policy is intended to promote security best practices among UIC's employees and those UIC collaborates with. Protecting UIC's information, physical, and IT resources is a team effort involving the participation and support of every UIC employee and affiliate who deals with information and/or information systems. It is the responsibility of every employee to know and comply with these guidelines.

DEFINITIONS

- a. Information systems These are Internet/Intranet/Extranet-related systems, including but not limited to computer equipment, mobile devices, software, operating systems, storage media, network accounts, and systems used for collecting, creating, storing, processing, and distributing information.
- b. Information Anything spoken, overheard, written, stored electronically, copied, transmitted, or held intellectually concerning UIC's general business, information systems, employees, business partners, or customers, including data and entity types.
- c. Employees Employees include full-time employees, part-time employees, and any authorized personnel having access to UIC's



information systems.

- d. User Employee authorized to have access to certain designated information systems.
- e. Data One or more of the following characterize data used in this policy:
 - i. Information that is processed by means of equipment operating automatically in response to instructions given for that purpose.
 - ii. Information that is recorded with the intention that it should be processed by means of such equipment,
 - iii. Information that is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system, and
 - iv. Information that does not fall within any of the above but forms part of a readily accessible record covering an individual.

Data, therefore, includes any digital data generated by a computer or automated equipment and any manual information that is part of a relevant filing system.

RESPONSIBLE PARTIES

- a. All users are required to adhere to this policy while using any of the company's information systems. Users are responsible for conducting themselves in a professional, responsible, and courteous manner at all times.
- b. Managers are required to inform all employees of this policy and ensure each employee fully understands and undertakes to comply with this policy.

COPYRIGHT AND OWNERSHIP

- a. Users should be aware that the data they transmit or create on company systems is deemed to be the property of UIC and is subject to monitoring. UIC proprietary information stored on electronic and computing devices whether owned or leased by UIC, the employee, or a third party, remains the sole property of UIC.
- b. All software, files, spreadsheets, calendars, work products, messages, memos, or any other data created and/or stored on company equipment are deemed the property of UIC.
- c. The employee must ensure that proprietary information is protected in accordance with this policy.
- d. The company has the capability, and retains the right to access data,



electronic and voice mail messages, Internet usage history, etc., at any time, with or without users' specific consent or knowledge. This is necessary to implement monitoring and compliance of UIC's information assets. All employees are expected to understand and comply with these responsibilities.

- e. For security and network maintenance purposes, authorized individuals within UIC may monitor equipment, systems, and network traffic at any time.
- f. Employees have <u>no expectation of privacy</u> in any files, data, photos, or any other information stored in any manner on any of the company's information assets and expressly acknowledge that any and all such information and files are the property of the company and may be deleted, shared, copied and/or destroyed at the company's sole and absolute discretion, without any liability whatsoever to the employee, or former employee.

ACCEPTABLE USE

General Use of Company Resources

Users are required to adhere to the following principles regarding the usage of the company's information systems:

- a. Employees may use only the computers, computer accounts, and data for which they have authorization. Employees and/or Managers are required to notify IT immediately if their authorizations are no longer required for their current or new position.
- b. Each user should make a reasonable effort to protect their passwords and to secure resources against unauthorized use or access.
- c. Employees should use UIC provisioned hardware and software without altering any configuration settings implemented by the IT department. Any modification of the configuration may expose UIC's network and information resources to unauthorized access from users.
- d. Hardware or software (including shareware) shall not be installed on laptops or desktop computers, without the IT department's approval. Authorized devices include company-provided laptops, desktops, smartphones, tablets, and other information systems approved by UIC IT.
- e. Each user is personally responsible for the information security aspects relative to his or her laptop or desktop computer, or mobile device, and must comply with Corporate security policies.
- f. Laptop owners are personally responsible for protecting their laptops against theft and for secure storage of information stored in the laptop. Authorized laptops, desktops, external hard drives, jump drives and other



external storage devises will not include any personnel identity information or other employee data, without the previous written approval of IT.

- g. Users shall use the company's e-mail and other electronic communication assets in accordance with the UIC Online Communications and Social Media Policy.
- h. When handling, whether electronically or in hardcopy, the user shall take into consideration the information's classification, and safeguard the information as appropriate, based on the information security requirements of the different classification levels.

Personal Use

- a. The company provides a variety of electronic tools to its employees to assist them in meeting their business objectives of the company. Incidental, limited, personal use of reasonable duration may be permitted as long as it does not interfere with the systems' intended business purpose.
- b. Users are responsible for exercising good judgment regarding the reasonableness of personal use.
- c. Users are not to process, store, or directly access UIC data information on systems, other than those provided by UIC.
- d. Users are not to copy, export, or upload UIC data to any personal device, removable storage, or cloud hosted server without the written consent of the UIC SR. Director of IT.
- e. Examples of sites and activities that are expressly prohibited include, but are not limited to:
 - Pornographic or sexually oriented sites,
 - Internet sites or social media dedicated to violence or hatred,
 - Internet relay chat (IRC) and illegal chat rooms, and
 - MP3 downloads and file sharing or streaming media sites.

Adherence with Federal, State, and Local Laws

The nature of UIC's business requires it and its employees to adhere to a country's federal, state, and local laws. This is applicable to all subsidiaries of UIC operating outside the jurisdiction of the United States. All employees of UIC are expected to uphold local and federal law as stated below.

UNACCEPTABLE USE

Under absolutely no circumstance are any UIC's systems to be used to solicit, harasses, or otherwise offend, nor may it be used for any unlawful purpose, such



as accessing illegally distributed materials that are sexually explicit or otherwise inappropriate or unlawful.

The following activities are, in general, prohibited. At UIC's sole discretion, employees may be exempted from these restrictions during the course of their legitimate job responsibilities (e.g., systems IT staff may have a need to disable the network access of if that host is disrupting production services).

- a. Prohibited system and network activities include:
 - Unauthorized copying of copyrighted material,
 - Installing peer-to-peer (P2P) applications,
 - The streaming of audio and video media for personal use over corporate facility internet,
 - Exporting software, technical information, or encryption software or technology,
 - Introduction of malicious programs into a company network or server,
 - Revealing your account password or authentication device to others or allowing use of your account by others,
 - Making any offers of non-company products, items, or services,
 - Enabling security breaches or disruptions of network communication,
 - Circumventing user authentication or security of any host, network, or account, and
 - Providing information about, or lists of, any company employees to parties outside the company.
- b. Prohibited e-mail and communications activities include:
 - Sending unsolicited non-work related e-mail messages, including but not limited to junk mail or spam,
 - Any form of harassment via electronic mail, online communication, or telephone,
 - Unauthorized use, or forging, of e-mail header information.
- c. Employees may not store, process, maintain, or backup company data on personally owned computers, mobile devices, or any storage device not owned by UIC. If any such unauthorized storage, processing, maintenance or backups occur, such company data shall retain its character as a company asset and shall remain company property.
- d. Use of company equipment to copy and/or transmit any document, software, or other matter in violation of any copyright, patent, or any other applicable intellectual property right, law, or regulation is strictly is



prohibited.

- e. Introduction of malicious programs into the network or server (e.g., viruses, worms, Trojan horses, e-mail bombs, etc.) constitutes harmful behavior and is unacceptable as per company policy.
- f. Revealing your account password to others or allowing use of your account by others is not allowed. This includes family and other household members when work is being done at home.
- g. Executing any form of network monitoring that will intercept data not intended for the employee's host, unless this activity is a part of the employee's normal job/duty, is not allowed.
- h. Employees should not circumvent security or user authentication on any company device.

POLICY COMPLIANCE

The UIC Information Technology department will verify compliance to this policy through various methods, including but not limited to, business tool reports, internal and external audits, and feedback to the policy owner.

Any violation of this policy will be handled in accordance with the UIC Corrective Action Policy (UIC-HR-2-6-026).

EXCEPTIONS

The UIC SR. Director of IT, in consultation with Executive Management as necessary, must approve any exception to the policy in advance.

Revision	Change Description	Author / Revised By	Approved By	Effective Date
1	Original issue	UIC SR. Director of IT Ted Rayhart	CEO/President Delbert Rexford SOF	6/30/2020



INTERNET USAGE

UIC-IT-2-6-001 Rev 0

PURPOSE

The purpose of this policy is to clearly state the position of UIC and its family of companies in establishing guidelines governing employee use of Internet services provided by UIC or our clients. The Internet is a powerful communications tool that's use is encouraged to support the goals and objectives of the business. However, an employee's improper use of UIC-provided Internet services can waste time and resources and create legal liability and embarrassment for both UIC and its employees.

ELIGIBILITY

These guidelines apply to UIC family of company employees or contractors who use UICprovided Internet services that is:

Accessed on or from UIC premises;

Accessed using company computer equipment, including smart phones, or via companypaid access methods; or personal equipment when using company-provided Internet services, or

Used in a manner that identifies the individual with the company.

Employees are also expected to adhere to these guidelines when using client-provided Internet services as well as any applicable policies the client has established.

POLICY

Unacceptable use of the Internet includes, but is not limited to:

Engaging in illegal, fraudulent, or malicious conduct;

Working on behalf of organizations without any professional or business affiliation with UIC;

Sending, receiving, or storing offensive, obscene, discriminatory, or defamatory material;

Intimidating or harassing other individuals;

Sending uninvited or inappropriate e-mails of a personal or offensive nature;

Monitoring or intercepting the files or electronic communications of employees or third parties;

Obtaining unauthorized access to any computer system;

Using another individual's account or identity without explicit authorization;

Attempting to test, circumvent, or defeat security or auditing systems of UIC or any other organization with whom we are partnering without prior authorization; or

Distributing or storing chain letters, jokes, solicitations, offers to buy or sell goods, or other non-business material of a trivial or frivolous nature.



If an employee is unsure about what constitutes acceptable Internet usage, then they should ask their supervisor for further guidance and clarification.

PERSONAL USE:

UIC provides Internet services for employees' business use. Very limited or incidental use of Internet services for personal, non-business purposes is acceptable. However, personal use must be infrequent and must not:

Involve any prohibited activities listed above;

Interfere with the productivity of the employee or their co-workers;

Consume file server system resources or storage capacity on an ongoing basis; or

Involve large file transfers or otherwise deplete system resources available for business purposes.

UIC MONITORING RIGHTS:

Employees should not expect privacy with respect to any of their activities using UIC provided Internet access or services. UIC reserves the right to review any files, messages, or communications sent, received, or stored on UIC's computer systems. All sites and downloads may be monitored and/or blocked by UIC if they are deemed to be harmful and/or not productive to business. Supervisor requests to review an employee's online activity must be coordinated through their company's Human Resources department.

DISCIPLINE:

Violation of these policies could result in disciplinary and/or legal action leading up to and including termination of employment. Employees using UIC's computer system for defamatory, illegal, or fraudulent purposes are also subject to civil liability and criminal prosecution. Employees may also be held personally liable for damages caused by any violations of this policy.

EXCEPTIONS

There are no exceptions to this policy.

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	S. Shephard	CEO/President	06/07/2012



ADMINISTRATIVE ACCESS TO COMPANY COMPUTERS

UIC-IT-2-6-003 Rev 0

PURPOSE

The purpose of the admin rights policy is to establish criteria for which elevated access rights to a company laptop, desktop etc. may be granted.

ELIGIBILITY

This policy applies to all company employees.

POLICY

The UIC/UTS IT department will grant the appropriate level of access rights to end users who require them to perform their work duties. By default, all end users will be granted 'Least Privilege' access level to maintain security and integrity of corporate data and information systems. Elevated access rights will only be granted under the condition that they are deemed essential for the performance of the grantee's job. The IT department will track all end users with elevated privileges to ensure adherence to corporate IT policies. End users who require elevated privileges must sign a waiver that details the user's responsibility and describes the pitfalls of misusing elevated privileges.

DEFINITIONS:

Domain Admin: This is the top level access right and is reserved for senior IT technical staff.

Systems Admin: This is a family of access levels that are reserved for IT staff that perform specific functions, i.e. Desktop Admins, Database Admins, etc.

Local Admin: This access level is the top level access granted to a specific computer only. It includes all rights, i.e. bypassing Internet security, disabling virus scanning, installing programs and loading drivers

Power User: This is mid-level access. It grants access to a few, but not all, administrative rights on a particular computer, i.e. installing software and loading drivers.

Domain User: This is the lowest access level and the default for all users. The only administrative access it allows it the loading of drivers.

Least Privilege: This is the least level of access that is required for a user to perform their job.

EXCEPTIONS

There are no exceptions to this policy.



Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC IT	CEO/President	5/1/2013



COMPUTER PASSWORD

UIC-IT-2-6-007 Rev 0

PURPOSE

The purpose of this policy is to establish a baseline requirement for UIC passwords.

ELIGIBILITY

This policy applies to all individuals that are required to enter a password to access UIC owned computers, networks and services. Service accounts used by IT for infrastructure integration and batch processing are governed by separate internal policies. For the purposes of this policy, the term password refers to passwords, PINs and/or similar methods of securing consoles and access to data.

POLICY

GENERAL REQUIREMENTS

It is the responsibility of the individual (as described in the section "Eligibility" above) to maintain the security and privacy of the passwords for their own user accounts. The individual is thereby responsible for any actions taken under the authorization of their account.

A password should have no direct relationship to the individual creating it, i.e. child's name, username, favorite sports team, license plate number, etc.

Passwords may not at any time be written down.

Passwords may not be shared with other individuals, whether employees or not. If another individual requires similar access, they must seek approval through appropriate channels for access under their own unique account.

Some systems, such as phones, only support limited and short PINs. For these, the General Requirements apply. For systems that support alpha-numeric passwords, for example direct company network access from workstations, or Internet-based application access, the following additional requirements apply:

Passwords will be a minimum of 7 characters.

Passwords must be complex, that is they must contain a combination of three or more of the following:

Lower case letters Upper case letters Numbers Special characters, i.e. \$ or !

Passwords will be changed every 90 days



Passwords may not be reused until at least three reset periods have passed

UIC will support compliance with the above guidelines by configuring applications, where possible, to enforce them. When the systems do not enforce compliance, it is the individual's responsibility, by way of being granted access to UIC data, to ensure their compliance with the above guidelines.

EXAMPLES AND GUIDANCE

To help understand the requirements of this policy, the following recommendations are offered as guidance for choosing good passwords:

Change passwords whenever there is suspicion that they may have been compromised – remember, it is your responsibility to protect the secrecy of your password.

An easy way to generate and remember new passwords:

Make up a sentence you can easily remember. Some examples:

- I have two children: Jack and Jill.
- I like to eat BBQ chicken pizza!
- Next, use the first letter of each word in the sentence, and include the punctuation. Also, convert numbers into digits. For example, the above two sentences would become:
 - Ih2c:JaJ.
 - IteBcp!

This method is easy to use, especially if you consistently follow the rules for converting the sentence to a password. Rather than remembering a cryptic password, you are only remembering the unique sentence and the rules for conversion

EXCEPTIONS

There are no exceptions to this policy.

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC IT	CEO/President	7/17/2013



COMPUTER CONSOLE LOCKOUT

UIC-IT-2-6-006 Rev 0

PURPOSE

The purpose of this policy is to establish UIC's computer console lock policy in line with industry best practice and guidelines. The goal of this policy is to lessen the risk of unauthorized access to UIC proprietary and/or confidential data resulting from an unattended computer.

ELIGIBILITY

This policy applies to all UIC or subsidiary employees, contractors and/or any users of systems that contain UIC data, belong to UIC, are managed by UIC, or are connected to UIC Networks, including phones.

POLICY

When leaving a computer, phone or system (see "Scope" below) unattended, all individuals must either log out or lock the system to prevent unauthorized access, e.g. on a Windows computer, pressing ctrl-alt-delete and selecting "Lock Workstation."

Anytime a UIC-managed computer is left idle for more than 15 minutes, it will automatically enter a locked state.

It is the employee's responsibility to protect company data by taking steps to prevent unauthorized access. The employee is responsible for any actions taken under the authorization of their account.

For the purposes of this policy, the use of the terms 'computer', 'workstation' and 'system' refer generally to any system facilitating access to company electronic data, including phones, laptops, workstations, tablets, and similar devices.

EXCEPTIONS

There are no exceptions to this policy.

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC IT	CEO/President	7/24/2013



TECHNOLOGY AND SOFTWARE COMPATIBILITY

UIC-IT-2-6-009 Rev. 1

PURPOSE

Safeguard UIC property and ensure technology and software purchases are compatible with existing infrastructure.

SCOPE

UIC Corporate and its subsidiaries

POLICY STATEMENT

All company-owned hardware and software must be approved by the IT Department prior to purchase. Requested approval allows the IT Department to determine whether the item is supportable in the Corporate environment prior to purchase.

Additionally, the IT team has access to multiple corporate vendors that provide costsavings for electronic devices and software.

Items that require approval:

- Computers
- Telecommunications/Network Equipment
- Monitors
- Printers
- Mobile devices
- All Software

EXCEPTIONS

N/A

Revision	Change Description	Author / Revised By	Approved By	Effective Date
1	Original issue	Ted Rayhart	CEO/President Delbert Rexford	5/4/2020
			SOF	



TRAVEL AND EXPENSES

UIC-ACTG-2-6-046 Rev. 1

PURPOSE

The purpose of this policy is to outline the travel guidelines for employees when traveling on company business.

Business travel policies are aligned with company reimbursement rules. All businessrelated travel paid with the Company funds must comply with company expenditure policies.

SCOPE

This policy applies to UIC, its holding companies and subsidiaries.

POLICY STATEMENT

It is the policy of the Company to reimburse staff for reasonable and necessary expenses incurred during approved work-related travel.

Travel Authorization

Authorization from your manager or customer responsible for paying for the travel is required before you make your reservations.

Travel Time

Approved Company-required travel that occurs during your normal regular working hours is considered compensable work time. If the Company-required travel occurs on a normal day off you will be paid for any travel occurring during your normal working hours. Pay for travel time that does not coincide with your regular work hours is normally not paid unless it is provided for under contract provisions or is required by legal requirements. Pay for time spent in travel from home to work, or home to the airport, is also not paid in most circumstances.

Travel Expenses and Perdiem

The Company provides reimbursement of authorized business and travel expenses for necessary, reasonable and allowable expenses. All approved travel expenses will be reimbursed via the company travel reimbursement process. You must provide receipts supporting all expenses in order to be reimbursed. All travel must be approved in advance by the employee's manager. Reimbursements for travel expenses should be submitted no later than five days upon return from travel.

Company-required travel conforms to the Joint Travel Regulations (JTRs), Federal Travel Regulations (FTRs), and Federal Acquisition Regulations (FARs). All employees, direct or indirect, are expected to use these guidelines for reimbursement of lodging,



meals and incidentals expenses. We reimburse these expenses up to daily JTR/FTR per diem rates. If an employee is unable to travel within the JTR/FTR regulations, expenses above these daily rates must be pre-approved by the government customer and the employee's Manager.

The Company will not normally reimburse any expenses in excess of prescribed, location-specific per diem rates when the employee is traveling on a government contract. However, with appropriate justification and prior manager approval, the prescribed per diem rates may be exceeded. In addition, if the per diem is to be charged to a government contract, approval from the Contracting Officer is required.

Air Travel

You should make every effort to travel by air in the most economical way. Please plan accordingly to take advantage of 14-day or 7-day advanced ticketing.

Lodging

If you are working under a contract, there may be occasions when lodging is not available within the published rates. With appropriate justification and prior approval, costs in excess of the maximum shall be considered for reimbursement.

Travel Reservations

A travel specialist employed by the subsidiaries may be required to book travel accommodations. Please check with your manager before making reservations. The travel specialist will adhere to all of the criteria contained in this policy.

Travel Authorization

Travel Authorization from the employee's manager is required to initiate travel arrangements. The employee's manager will ensure that expenditures are within the provisions of the policy and/or contract.

EXCEPTIONS

There are no exceptions to this policy.

F	Revision	Change Description	Author / Revised By	Approved By	Effective Date
	4		CFO	CEO/President	0/00/0004
	1	Original issue	Joseph Stanich	Delbert Rexford SOF	2/22/2021



VISITORS IN THE WORKPLACE

UIC-HR-2-6-024 Rev0

PURPOSE

The purpose of this policy is to state the Company's rules regarding visitors in the workplace.

ELIGIBILITY

This policy applies to all employees and visitors.

POLICY

Only visitors who are properly authorized may be on UIC premises in order to maintain safety standards, safeguard employee and customer welfare, protect our property and facilities, guard confidential information against theft, and reduce potential distractions and disturbances.

All visitors should enter all UIC facilities at the reception area.

Employees are responsible for the conduct of their visitors and to watch out for their safety and the safety of others.

Employees who see an unauthorized person at work should notify their supervisor immediately or direct the person to the reception area.

EXCEPTIONS

Exceptions require the approval of the subsidiary or Corporate Human Resources Director.

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	CEO/President	04/01/2011



ANIMALS IN THE WORKPLACE

UIC-HR-2-6-093 Rev 0

PURPOSE

The purpose of this policy is to state the Company's rules regarding animals in the workplace.

ELIGIBILITY

This policy applies to all employees and visitors.

POLICY

UIC provides a safe and healthy work environment for all employees and visitors. In accordance with this, all animals are prohibited from UIC and customer work sites, to include buildings, parking lots, grounds, common areas, and premises.

EXCEPTIONS

Exceptions require the approval of the subsidiary or Corporate Human Resources, and will only be authorized in accordance with the UIC Disability Accommodation Policy (UIC-HR-2-6-013) and the Americans with Disabilities Act (ADA).

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	CEO/President SOF	9/23/2020



USE OF TOBACCO AND RELATED PRODUCTS

UIC-HR-2-6-019 Rev 3

PURPOSE

The purpose of this policy is to state the Company's rules regarding the use of tobacco and related products in company work areas and places of business such to protect the health of our employees, customers, and community.

ELIGIBILITY

This policy applies to all employees.

POLICY

Buildings and other enclosed spaces in which our employees work and conduct business are designated as "tobacco free" areas in which use of tobacco and related products is prohibited.

This includes but is not limited to laboratories, office spaces, conference rooms, public meeting rooms, elevators, restrooms, atriums, entryways and company vehicles.

Tobacco use includes carrying, holding, or using lighted smoking materials (e.g. cigarettes, cigars, and pipes), smokeless tobacco products, and related products such as electronic cigarettes. It does not include the use of nicotine patches or gum.

Generally, smoking is allowed in outside areas, although employees are required to comply with more restrictive limits on the use of tobacco and related products that may be in place in such areas through local smoking ordinances, building lease terms, customer site requirements, or other measures.

EXCEPTIONS

There are no exceptions to this policy.

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	CEO/President	04/01/2011
01	Addition of Company Vehicles to designate No Smoking Areas	UIC HR	CEO/President	05/04/2012
02	Name change from Smoking to Tobacco Usage, addition of electronic cigarettes	UIC HR	CEO/President	02/20/2014
03	Name change from Tobacco Usage to Use of Tobacco and Related Products, some terms more defined		CEO/President	5/21/2014



APPEARANCE AND BELONGINGS

UIC-HR-2-6-017 Rev 0

PURPOSE

The purpose of this policy is to ensure that employees understand professional standards regarding their appearance and to ensure safe-keeping of employee belongings.

ELIGIBILITY

This policy applies to all employees.

POLICY

Employees are expected to use good judgment and common sense in their appearance when performing their role with the Company. Personal appearance, proper hygiene, and appropriate attire are important in the workplace and should not pose a safety hazard.

The following are some general examples:

Business attire: Employees should wear appropriate business attire in business situations such as meetings with clients or customers or representing the Company. Some examples of business attire include suits, trousers, jackets, dresses, skirts and proper footwear.

Casual attire: More casual attire is appropriate in situations that do not require client meetings.

Field attire: Employees should dress in a manner that is appropriate for work in the field. This may include wearing uniforms or protective clothing and wearing all personal protective equipment required for the job and weather.

Inappropriate attire: Employees should not wear clothing that is inappropriate in the workplace. Those who do will be asked to return home and change to attire that is appropriate. Inappropriate includes articles that expose too much of a body, are torn or display obscene pictures or words. Some people consider inappropriate attire as harassing and offensive. Some examples include:

- Tops of shirts that expose the shoulders or back
- Transparent clothing or clothing that exposes mid-sections of the body or undergarments
- Suggestive clothing that may be too tight or revealing
- Workout clothing including headbands and hats
- Inappropriate logos, slogan t-shirts, words, messages which may be offensive or distracting to co-workers or customers

Casual Friday: Employees may dress casually on Fridays. Employees should use good judgment when considering meetings with clients or customers that may occur on Friday.



Employees who have questions regarding appropriate appearance for their position or location should talk with their supervisor. Employees who continue to report to work dressed in unacceptable attire may be subject to discipline.

Professional staff attire for employees working at customer sites will be determined by the employee's program/project/site manager on a location-by-location basis.

Personal Belongings

In personalizing their workplace for comfort and pleasantness, employees should remember that the Company cannot ensure safe-keeping of their items. Safety is the Company's first priority. Objects brought into the workplace by employees should be safe and not interfere with work. Items should also not be derogatory or offensive in nature.

EXCEPTIONS

Exceptions require the approval of the subsidiary or Corporate Human Resources Director.

Rev	# Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	CEO/President	04/01/2011



HOUSEKEEPING

UIC-HR-2-6-018 Rev 1

PURPOSE

The purpose of this policy is to maintain an orderly, clean, and safe workspace for UIC employees.

ELIGIBILITY

This policy applies to all employees and visitors.

POLICY

It is the responsibility of all employees to practice good housekeeping in the workplace including keeping workspace, coffee areas, and conference rooms orderly and clean. Aisles, stairs, and walkways need to be clear as a matter of safety as well as appearance.

UIC expects that all offices and spaces used by the staff and their visitors remain free of scented products. Use of air fresheners, candles, scented or unscented, and potpourri are prohibited. Use of cleaning products other than those purchased or approved by the Company are prohibited for cleaning personal workspaces. Personal care products such as cologne, perfume, aftershave lotions, scented lotions, fragranced hair products and/or similar products are to be worn in moderation in accordance with the UIC Appearance and Belongings Policy (UIC-HR-2-6-017).

For the comfort of employees and visitors, foods that produce strong smells should be stored in airtight containers and not be microwaved in the office.

EXCEPTIONS

There are no exceptions to this policy.

Rev #	Description of Revision	Revised by	Approved by	Effective Date
00	Original Issuance	UIC HR	CEO/President	04/01/2011
01	Added language	UIC HR	CEO/President SOF	9/23/2020