



Employee Manual

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FAMILY ORTHODONTICS AND COMPANY
NEW ENGLAND FAMILY DENTISTRY AND COMPANY

Welcome to our Company!

Family Orthodontics/New England Family Dentistry (the “Company”) is a company committed to the principles of safety, security, and growth. Such standards are achieved by fostering a work environment based on ethical practices and quality of care. After completing his residency in orthodontics from the Harvard School of Dental Medicine, owner and Chief Executive Officer, Dr. Patrick Assioun, opened his first practice limited to orthodontics in 2005. Family Orthodontics in Milford, Massachusetts was the first office built on the principle of ensuring access to quality dental care for all patients, irrespective of insurance and barriers relating to finances and health literacy. Since 2005, the Company has transitioned from sole orthodontic practices to those encompassing general dentists and hygienists as well as specialists in pediatric dentistry, endodontics, and oral surgery in Massachusetts, New Hampshire, and Connecticut.

This employee manual was developed to provide our employees with information regarding the operations of New England Family Dentistry. This manual will be revised and updated on an annual basis as modifications to policies or procedures become available and/or warranted.

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I. Company Overview

Company Mission Statement

It is our mission to lead in delivering evidence-based and comprehensive oral health care through established standards and guidelines promoting professionalism, safety, ethics, and clinical excellence.

Company Pillars
<p>Access to Care All care provided by our dentists will assimilate the established standards of practice and scientific evidence to develop treatment strategies relevant to each patient's specific oral health needs, not to their insurance. Our experienced and skilled clinicians provide preventive, restorative, orthodontic, surgical, and emergency dental care and services and offer a range of sedation options to use during treatment.</p>
<p>Disease Management We believe in evidence-based and individualized disease management for both dental and periodontal conditions. Our providers utilize current CAMBRA and AAP methodology to properly diagnose and treat their patients in accordance with the standard of care and best practices. This risk-based approach to disease management emphasizes individualized treatment decisions based on the patient's behavioral and biological characteristics, with a focus on prevention and maintenance.</p>
<p>Quality Assurance and Risk Management We believe in the importance of Quality Assurance and Quality Improvement. We have an executive clinical board employed to formulate and develop standard operating procedures that reflect the principles of evidence-based dentistry and the standard of care. These providers systematically synthesize the literature to create new practice guidelines and will judiciously modify any current practice guidelines in accordance with new systematic reviews.</p>
<p>Clinical and Regulatory Compliance We believe maintaining standards of compliance is fundamental in achieving quality care and clinical excellence. We have developed and sustained detailed practices to ensure consistent adherence to all regulations enforced by federal and state agencies pertaining to infection control, patient and employee safety, radiation control, fire safety, and chemical safety.</p>
<p>Mentoring, Training and Continuing Education We believe in investing in the training and development of our employees. Our professional training programs give all employees the knowledge and skills to excel in their roles. Our employee development focuses on career growth with instruction in leadership, strategy, and mentoring.</p>
<p>Marketing Our marketing team focuses on helping us grow and retain patients. They develop market-specific campaigns reflective of an evolving consumer market through effective multi-channel marketing strategies.</p>

Purpose of Manual

The Company has adopted the following manual to outline the policies and procedures necessary for ethical business practice. These standards provide general parameters and guidance concerning the expectations of employees relating to their job function and responsibility within the organization. The guidelines also outline the obligations of the Company towards its employees concerning federal, state, and local laws and directives. All employees must read and abide by the

content within this manual. The Company is committed to fostering communication with its employees and all employees may address any questions or concerns to Management.

Organizational Code of Conduct

All employees of the Company must always comply with all applicable laws and regulations. The Company will not condone the activities of employees who achieve results through violations of the law or unethical business dealings. This includes any payments for illegal acts, indirect contributions, rebates, and bribery. The Company does not permit any activity that fails to stand the closest possible public scrutiny. All business conduct should be above the minimum standards required by law. Accordingly, employees must ensure their actions cannot be interpreted as being, in any way, in contravention of the laws and regulations governing the company's established operations.

Equal Opportunity Statement

The Company provides equal employment opportunities to all employees and applicants for employment and prohibits discrimination and harassment of any type without regard to race, color, religion, age, sex, national origin, disability status, genetics, protected veteran status, sexual orientation, gender identity or expression, or any other characteristic protected by federal, state or local laws. This policy applies to all terms and conditions of employment, including recruiting, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation, and training.

Contractual Disclaimer and At-Will Statement

Your employment with the Company is at-will. This means that while your employment is for an indefinite period, it is subject to termination by you or the Company, with or without cause, with or without notice, at any time. Nothing in this manual or in any policy of the Company shall be interpreted to conflict with, or to eliminate or modify in any way, the at-will employment status of the Company's employees. Nothing in this handbook is intended to constitute a contract of employment, express or implied. The at-will employment status of an employee of the Company may be modified only in a written employment agreement with that employee signed by a designated executive of the Company.

Compliance with State and Federal Law

The Company strives to keep this Manual current with any new or modified state and/or federal laws. If there is a portion of this Manual that conflicts with currently applicable state and/or federal law, the state or federal will apply and take precedent over the conflicting language of this Manual.

Employee Orientation and Licensure

Orientation and Training

Employees will receive an orientation and job-specific training prior to commencing work. Training will include job expectations, introduction to safety policies and procedures, and risk evaluation and determination. This includes, but is not limited to:

- 1) Review and education on established company clinical guidelines, including radiograph indication and frequency, caries risk assessment, disease management and restorative techniques, periodontal assessment, and behavior management.
- 2) Training on office software.
- 3) Instruction relating to company compliance program and protocols as well as state-specific regulations and directives.
- 4) Training on company's OSHA compliance program and protocols.
- 5) Review of all office documents, including medical history, patient informed consent, treatment consent, and informed refusal.

In addition, employees will receive training on the following modules:

Employee Manual	Globally Harmonized System	HIPAA	Infection Control	OSHA (BBP/ Post-Exposure)	Hazard Communications/ GHS
Managing Medical Emergencies	Risk Management: Dental Informed Consent	Risk Management: Dental Record Keeping and Documentation	Sterilization and Disinfection/ Instrument Processing	Opioid Safety and Pain Management	Fraud and Abuse

The employee must achieve a score of 70 or above to pass orientation. Certifications of completion will be maintained in the employee's file by Human Resources and on-site in their designated home office.

Licensure

The Company will verify the professional, state-issued license of all applicable providers prior to the commencement of orientation. Only providers with an *active* professional license status will be permitted to begin orientation and employment. Providers with a license status of anything other than active, including *pending, suspended, or expired*, will not be permitted to commence the orientation process. Further, Human Resources may withdraw the initial offer of employment.

For licensed providers currently practicing within the Company, the Compliance Department will maintain verification of licensure status on a monthly basis. Only providers with an *active* professional license status will be permitted to work. If a license is determined to be anything other than active, including *pending, suspended or expired*, the provider will be suspended immediately and/or terminated.

Employee Code of Conduct

Employees are always expected to promote the best interest of the Company. In so doing, employees shall comply with the letter and spirit of all applicable laws and regulations and shall act in the highest standard of business, professional, and personal conduct. Employees are expected to conduct themselves in a manner to avoid even the appearance of impropriety. Employees shall always exercise proper and reasonable care in the use, protection and conservation of the assets of the Company. This includes, but is not limited to:

- 1) Employees are prohibited from partaking in activities such as drinking, gambling, fighting, swearing, and other similar unprofessional activities, while on the job.
- 2) Employees must not engage in sexual harassment or conduct themselves in a way that may be construed as such, by using inappropriate language, keeping or posting inappropriate materials in their work area, or accessing inappropriate materials on their computer.
- 3) Employees must take care to separate their personal roles from their position within the Company when communicating on matters not involving the Company's business.
- 4) Employees must not use the Company's identification, stationery, supplies, and equipment for personal or political matters.
- 5) Employees must not presume to speak for the Organization on any topic, unless they are certain the views they express are those of the Company and it is the Company's desire that such views be publicly disseminated.

Confidentiality

Many employees of the Company have access to privileged information at various levels of confidentiality, and it is necessary to protect such information from inappropriate dissemination. This includes both information regarding the Company and personal information of patients that are protected by law.

Unless specifically agreed to in writing by the Company, all employees shall abide by the Company's existing policy regarding confidentiality and shall hold in strictest confidence and not copy or otherwise remove from the Company or disclose to any third party any information obtained in the course of employment by the Company which relates to the business or operations of the Company or its clients or patients ("Confidential Information").

Examples of Confidential Information include, but are not limited to, the following:

- 1) Information Systems and Risk Management
 - a. Computer code and source code;
 - b. Information system processes;
 - c. Data manipulation concepts;
 - d. Approach to document management.
- 2) Marketing
 - a. Customer lists;
 - b. Marketing strategies and/or plans;
 - c. Product information (including information regarding development, pricing, presentation, rollout and implementation);
 - d. Product development processes.
- 3) Accounting and Finance
 - a. Financial Information;
 - b. Billing records;
 - c. Credit information;
 - d. Status of accounts receivable and payable.
- 4) Legal
 - a. Status of actual or threatened litigation;
 - b. Status of any settlement discussions;
 - c. Status of any governmental or quasi-governmental investigations;

- d. Approach to various contract terms;
 - e. Employee policies;
 - f. Authority limits.
- 5) Human Resources
- a. Employee names;
 - b. Employee personal information;
 - c. Employee files/evaluations.
- 6) Miscellaneous
- a. Any documents, agreements, notes (including personal notes), computer files, archival or backup tapes or diskettes containing any of the foregoing.

The Company emphasizes employee obligation regarding Confidential Information extends beyond the term of an employee's employment with the Company. Upon the termination of employment, employees will be reminded of the Company's policy regarding confidentiality in an exit interview. Employees will also be required to adhere to any Company policies and rights regarding patents and inventions.

Confidentiality of Employee Manual

This Manual is considered confidential information and the Company requires employees to refrain from publicizing or sharing it, or any portion of it, with any person outside of the Company.

Business Gifts and Hospitality

The Company has established that no gifts, other than those of nominal value, such as occasional business luncheons, dinners, or other modest entertainment, should be offered or accepted in connection with company business. Offers of any gifts and/or hospitality should be evaluated on a case-by case basis, taking into account the type of business relationship and the potential influence such hospitality may appear to have on the conduct of company business. Employees should discuss any questionable offers with Management and/or a member of the executive leadership team. Offers of larger gifts and/or hospitality with a value in excess of \$25.00 should be delivered (and reported in writing) to their regional director and/or a member of the executive leadership team, regardless if there is reason to believe the gift may have been offered to influence the employee in the conduct of his or her duties.

Bribes and Kickback

Under no circumstances shall any employee accept or pay in any form any bribe or kickback, or otherwise receive or confer any direct or indirect benefit from another party in connection with or to influence the activities of the Company and/or its affiliated dental offices.

Embezzlement

Any embezzlement and/or fraud is strictly forbidden and will result in immediate termination. In addition, the perpetrator will fully be prosecuted according to the governing laws. Some example of embezzlement and fraud include, but is not limited to:

- 1) **Pocketing cash:** Company cash is taken without authorization or unrecorded cash payments and kept by an employee instead of properly reporting and put in the cash drawer
- 2) **Lapping:** Lapping involves the temporary withholding of receipts such as payments on accounts receivable. This system can become quite complicated to conceal over time as the accounts have to continually be falsified
- 3) **Check-kiting:** The check-kiter must be in the position to write checks on and make deposits in two or more bank accounts. One account could be the embezzler's personal account and the other a business checking account.
- 4) **Dummy supplier(s):** This involves falsifying documentation of fictitious purchase transactions.
- 5) **Insurance Fraud:** Filing false insurance claims in order to pad customer expenses or to assist patients in collecting additional false insurance payments

Conflicts of Interest

Employees are expected to serve the interests and needs of the Company with undivided loyalty. In fulfilling this obligation, each employee is expected to avoid conflict-of-interest situations and immediately report in writing any personal interest, direct or indirect, which may affect the impartiality of any employee in any matter relating to his or her job. Whenever practicable, even the appearance of a conflict-of-interest situation should be avoided.

Conflicts of interest may exist whenever an employee enters into a transaction or activity that:

- 1) Involves a matter that is directly or indirectly adverse to the interests of the Company;
- 2) Might affect or appear to affect the employee's judgment or decisions on behalf of the Company; or
- 3) Might cause any adverse criticism of the Company.

To avoid potential conflicts of interest, employees shall refrain from:

- 1) Working for any other dental practice without consent of a member of the executive leadership team;
- 2) Beginning or maintaining any relationship that involves compensation (including both financial and non-financial benefits to the employee or his or her immediate family) with an entity that is either a supplier to or competitor of the Company, or that is likely to be so in the future;
- 3) Purchasing an interest in any entity that is a supplier to or that competes with the Company and;
- 4) Accepting from any entity compensation (as described above) that could be construed as being related to the employee's arranging business between the Company and such entity. An "entity" includes any organization or a representative of such organization with which the Company does business.

II. Employee Rights

Family and Medical Leave (FMLA)

The Company upholds the U.S. Department of Labor's Family Medical Leave Act (1993). The FMLA entitles eligible employees of covered employers to take unpaid, job-protected leave for specified family and medical reasons with continuation of group health insurance coverage under the same terms and conditions as if the employee had not taken leave. Employees are eligible for FMLA leave if they have been employed by the Company for at least three consecutive months as a full-time employee. Eligible employees are entitled to:

- 1) Twelve workweeks of leave in a 12-month period for:
 - a) the birth of a child and to care for the newborn child within one year of birth;
 - b) the placement with the employee of a child for adoption or foster care and to care for the newly placed child within one year of placement;
 - c) to care for the employee's spouse, child, or parent who has a serious health condition;
 - d) a serious health condition that makes the employee unable to perform the essential functions of his or her job;
 - e) any qualifying exigency arising out of the fact that the employee's spouse, son, daughter, or parent is a covered military member on "covered active duty;" **or**
- 2) Twenty-six workweeks of leave during a single 12-month period to care for a covered servicemember with a serious injury or illness if the eligible employee is the servicemember's spouse, son, daughter, parent, or next of kin (military caregiver leave).

During the employees twelve-week leave, the employee may use their accrued paid time off (PTO) which had been earned up to their date of leave. The following applies to employees who are granted unpaid leave:

- 1) PTO does accrue while on leave and can be used upon their return.
- 2) Group medical insurance may be continued if the employee currently earns that benefit and agrees to pay the entire premium amount

An employee returning from leave is entitled to receive vacation time, sick leave, bonuses, advancement, seniority, length of service credit, benefits, plans or programs for which they were eligible on the date of their leave. However, the Company does not include the time of the employee's leave in the computation of such benefits. An employee returning from authorized leave will be reinstated to active employment without loss of continuity in service, provided a suitable work assignment is available. The employee may return in a job that is different from the one they left, but it would be a similar position and may also be subject to any action that affects other Company employees.

If order for an employee to request FMLA leave, he or she must notify Human Resources (HR) and complete the Employee Notice of Family and Medical Leave Form. This form must be completed and submitted, at a minimum, of thirty (30) days before the requested date of leave. If this is not possible, the employee must notify the employer as soon as he or she becomes aware of the need to take leave.

Massachusetts Paid Family and Medical Leave Law

The Massachusetts Paid Family and Medical Leave Law of 2018 entitles employees to receive annually, starting in January 2021:

- 1) Paid family leave of up to 12 weeks to care for family members with a serious health condition, or for bonding by mothers and fathers with a child in connection with childbirth, adoption or foster care placement;
- 2) Paid medical leave of up to 20 weeks for the covered individuals' own serious health condition;
- 3) Combined paid medical and family leave of up to 26 weeks.

These benefits are based on an employee's average weekly earnings, up to a maximum of \$850/week, with the maximum adjusted periodically. The first seven calendar days of benefits are unpaid, but employees can use accrued sick time, vacation time or PTO for this initial period. The minimum income requirement to receive benefits is at least \$4,700 over the last 12 months.

The benefits are paid through a combination of employer contributions and deductions from wages of employees which starts on July 1, 2019 and makes up a trust fund for distribution starting in January 2020. The entire contribution is .63 percent, which is split equally between employee and employer.

A covered "Serious Condition" includes in-patient care in a medical facility as well as conditions requiring "continuing treatment" of a health care provider. This includes chronic conditions, conditions involving short term incapacity involving ongoing treatment, and pregnancy. Leave to care for family members who were injured while performing military service is up to 26 weeks.

"Family members" include a covered employee's spouse, child and parent, domestic partners, parents of a spouses or domestic partner, grandchildren, grandparents and siblings. Employers can only deny an employee on leave for reinstatement to a position involving equal compensation and status only if the employer can show a change in economic conditions or operating conditions.

More state specific FMLA information can be found at:

Massachusetts: <https://www.mass.gov/guides/fmla-leave-family-and-medical-leave-act>

New Hampshire: <https://das.nh.gov/hr/fmla.aspx>

Connecticut: <https://portal.ct.gov/DAS/Lists/Human-Resources-Business-Rules-and-Regulations/Benefits/Medical-Leave-FMLA>

Accommodations for Employees with Disabilities

The Americans with Disabilities Act (ADA) is a federal law protecting the rights of people with disabilities by eliminating barriers to their participation in many aspects of working and living in America. Title I of the ADA prohibits covered employers from discriminating against people with disabilities in the full range of employment-related activities, from recruitment to advancement to pay and benefits.

The Company is committed to providing equal employment opportunities to otherwise qualified individuals with disabilities. Accordingly, the Company will make reasonable accommodations, consistent with federal and state law, to enable an employee with a disability to perform the essential functions of the job unless the requested accommodation(s) would pose an undue hardship on the practice. An employee in need of such accommodation should notify the executive team in writing and must provide a copy of the notice to management. The notice should include a

description of the disability, the difficulty it causes, and the requested accommodation. The Company may request medical documentation confirming the disability, may ask to speak with the employee's physician, and may ask the employee to submit, at the practice's expense, to an independent medical or other appropriate examination to help the practice assess the need for accommodation and the accommodations available or necessary.

Disability Leave and Workers' Compensation

If an employee becomes injured or disabled or becomes ill on the job, they may entitle the employee to medical and/or disability-related leave under two federal laws: the Americans with Disabilities Act (ADA) and the Family and Medical Leave Act (FMLA). In addition, state workers' compensation laws may also be applicable. Depending on the situation, one or more of these laws can apply to the same employee.

Employees must report an injury or illness to their manager immediately or as soon as practical, but no later than the conclusion of the employee's shift. Further, all on-the-job injuries, regardless of severity, must be reported to HR within 24 hours of the illness/injury. HR will determine which law covers the employee's situation/ definition of disability using the following checklist:

- 1) Is the injury work related? (Workers' Compensation)
- 2) Does the employee have a serious health condition? (FMLA)
- 3) Does the employee's condition meet the definition of disability? (ADA)

In some situations, the Company may need a medical certification or consultation to ensure a requested accommodation is necessary and reasonable.

Military Leave

Military leaves of absence will be provided to regular and benefits-eligible staff in accordance with the Uniformed Services Employment and Reemployment Rights Act (USERRA) and applicable state laws protecting individuals with military commitments from detrimental employment decisions based on those commitments. Military leaves of absence may be paid or unpaid leaves in accordance with the provisions of this policy.

Military Leave is any time off that is provided to staff who are members of the National Guard or other reserve component of the United States Armed Services and who are called to active duty, attend scheduled reserve service, and/or temporary training duty. The Uniformed Services Employment and Reemployment Rights Act (USERRA) was signed on October 13, 1994. The Act applies to persons who perform voluntarily or involuntarily duty in the "uniformed services" - including the Army, Navy, Marine Corps, Air Force, Coast Guard, and Public Health Service commissioned corps, as well as the reserve components of each of these services. Federal training or service in the Army National Guard and Air National Guard also gives rise to rights under USERRA.

Uniformed service includes active duty, active duty for training, inactive duty training (such as drills), initial active duty training, and funeral honors duty (performed by the National Guard and reserve members), as well as the period for which a staff member is absent from Duke employment for the purpose of an examination to determine fitness to perform any such duty.

Notification of Leave

Unless giving notice is unreasonable or precluded by military necessity, staff requiring a military leave of absence should provide HR with a written or verbal advance notice along with, if available, a copy of the military order. It is recommended the notice be given to HR at least two weeks before the military-leave-of-absence start date. The employee can be asked to furnish the approximate beginning and concluding dates of his or her training.

During the period of Military Leave:

- 1) The length of employment service accrual should continue for the term of the Military Leave but may be severed upon any voluntary extension of military service that is not at the request of the government.
- 2) The staff member will receive no benefits.
- 3) An employee who returns from Military Leave within 90 days of discharge and who has given the Company adequate notification of his or her intent to return to work, will be placed in a position equal in status, benefits, and pay to the position he or she vacated. The employee will be credited with eligibility and benefit accruals for the period of his or her absence. Training or retraining and other accommodations may be required for staff members who take military leaves of absence.

Jury Duty

The federal Jury Systems Improvement Act requires all employers to provide unpaid leave to employees serving as jurors in federal courts. This act designates serving jury duty as a primary obligation over the employee's job. In the event an employee gets summoned for jury selection or jury duty, he or she must notify HR and their manager immediately with the date they are scheduled to appear for jury service.

If the employee is impaneled on a jury, he or she must inform their manager and HR and provide an estimate of how long the term of service is expected to last. While serving jury duty, employers are prohibited from:

- 1) Giving mandatory work assignments that may interfere with jury duty;
- 2) Asking the employee to reschedule jury duty or use vacation or personal days;
- 3) Asking the employee to reschedule jury service for a day the employee does not normally work;
- 4) Harass or coerce the employee or deny the employee benefits because of jury duty obligation.

State specific laws for compensation:

Massachusetts: All employees are entitled to their regular wages for the first three days of jury duty (afterwards, the state pays \$50 per day).

New Hampshire: Employers are required to provide unpaid time off for reporting to jury selection or jury duty.

Connecticut: Employers are required to pay full-time employees their regular wages for the first five days of jury duty, or any part thereof, unless they are considered temporary or casual employees. "Full-time" is defined as an employee holding a position normally requiring 30 hours or more of service in each week.

Unemployment Insurance

The U.S. Department of Labor's unemployment insurance programs provide unemployment benefits to eligible workers who become unemployed through no fault of their own and meet certain other eligibility requirements. Unemployment insurance is a joint state-federal program providing cash benefits to eligible workers. Each state administers a separate unemployment insurance program, but all states follow the same guidelines established by federal law. Employees qualify for unemployment insurance if they:

- 1) Are unemployed through no fault of their own. In most states, this means the employee separated from their last job due to a lack of available work.
- 2) Meet the state's work and wage requirements for wages earned or time worked during an established period referred to as a "base period."

Massachusetts: <https://www.mass.gov/orgs/departments-of-unemployment-assistance>

New Hampshire: <https://www.nhes.nh.gov/services/claimants/index.htm>

Connecticut: <https://portal.ct.gov/DOLUI>

Personal Safety and Harassment

The Company is committed to fostering an environment wherein all employees are treated with respect and dignity. Harassment is unlawful, and the Company will not tolerate any harassment of its employees by another employee, manager, or business associate.

The purpose of this policy is to ensure no one harasses an employee or otherwise interferes with an employee's job duties and responsibilities, which is largely determined by the victim's perception and reaction, not the perpetrator. Any questions about this policy should be directed to HR.

The Company expressly prohibits verbal or physical conduct by any employee that harasses, disrupts, or interferes with another's work performance or which creates an intimidating, offensive, or hostile environment. Specifically, and among other things, the Company's anti-harassment policy prohibits otherwise non-consensual and unwelcome touching; sexual advances, propositions, or suggestions; verbal abuse of a sexual or non-sexual nature; comments about a person's dress or body, color, religion, sex, national origin, age, disability or sexual preference; using sexually or otherwise degrading words to describe another; displaying or distributing sexually explicit or otherwise offensive material including posters, letters, poems, graffiti, cartoons or drawings; or engaging in racial, ethnic or religious slurs. Unwelcome advances of a sexual nature, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, (2) submission of or rejection of such conduct by an individual is used as a basis for employment decisions affecting such individual, or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

All complaints and concerns should be addressed to the employee's manager/ supervisor and not discussed with co-workers. Management will work with the employee and determine the necessary course of action.

Sexual Harassment

The Company's goal is to promote a workplace free of sexual harassment. Sexual harassment of employees occurring in the workplace or in other settings in which employees may find themselves in connection with their employment is unlawful and will not be tolerated by this organization. Further, any retaliation against an individual who has complained about sexual harassment or retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is similarly unlawful and will not be tolerated. To achieve our goal of providing a workplace free from sexual harassment, the conduct described in this policy will not be tolerated and we have provided a procedure by which inappropriate conduct will be dealt with, if encountered by employees.

Because the Company takes allegations of sexual harassment seriously, we will respond promptly to complaints of sexual harassment and where it is determined such inappropriate conduct has occurred, we will act promptly to eliminate the conduct and impose such corrective action as is necessary, including disciplinary action where appropriate.

Please note, while this policy sets forth our goals of promoting a workplace free of sexual harassment, the policy is not designed or intended to limit our authority to discipline or take remedial action for workplace conduct which we deem unacceptable, regardless of whether that conduct satisfies the definition of sexual harassment.

In Massachusetts, the legal definition for sexual harassment is sexual advances, requests for sexual favors, and verbal or physical conduct of a sexual nature when:

- 1) Submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of employment or as a basis for employment decisions; or,
- 2) Such advances, requests or conduct have the purpose or effect of unreasonably interfering with an individual's work performance by creating an intimidating, hostile, humiliating or sexually offensive work environment.

Under these definitions, direct or implied requests by a supervisor for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits, or continued employment constitutes sexual harassment. The legal definition of sexual harassment is broad and in addition to the above examples, other sexually oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating a work place environment that is hostile, offensive, intimidating, or humiliating to male or female workers may also constitute sexual harassment.

While it is not possible to list all additional circumstances that may constitute sexual harassment, the following are some examples of conduct which, if unwelcome, may constitute sexual harassment depending upon the totality of the circumstances, including the severity of the conduct and its pervasiveness:

- 1) Unwelcome sexual advances -- whether they involve physical touching or not;
- 2) Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life; comment on an individual's body, comment about an individual's sexual activity, deficiencies, or prowess;
- 3) Displaying sexually suggestive objects, pictures, cartoons;
- 4) Unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments;
- 5) Inquiries into one's sexual experiences;

- 6) Discussion of one's sexual activities All employees should take special note that, as stated above, retaliation against an individual who has complained about sexual harassment, and retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is unlawful and will not be tolerated by this organization.

If the Company receives a complaint, the allegation will be promptly investigated in a fair and expeditious manner. The investigation will be conducted in such a way to maintain confidentiality to the extent practicable under the circumstances. The investigation will include a private interview with the person filing the complaint and with witnesses, if applicable. We will also interview the person alleged to have committed sexual harassment. When the investigation is complete, we will, to the extent appropriate, inform the person filing the complaint and the person alleged to have committed the conduct, of the results of that investigation. If it is determined that inappropriate conduct has occurred, we will act promptly to eliminate the offending conduct, and where it is appropriate, we will also impose disciplinary action.

If it is determined that inappropriate conduct has been committed by one of the Company's employees, the organization will take such action as is appropriate under the circumstances. Such action may range from counseling to termination from employment and may include such other forms of disciplinary action as we deem appropriate under the circumstances.

In addition to the above, if you believe you have been subjected to sexual harassment, you may file a formal complaint with either or both of the government agencies set forth below. Using the Company's complaint process does not prohibit you from filing a complaint with these agencies. Each of the agencies has a short time period for filing a claim (EEOC - 300 days; MCAD - 300 days).

The United States Equal Employment Opportunity Commission ("EEOC")

The Massachusetts Commission Against Discrimination ("MCAD")

Grievance Procedure

All employees have the right to voice their complaints and concerns without fear of retaliation. If an employee feels any of their rights, as set forth above, are being violated or compromised, or believe they are being treated unfairly, they should bring the problem to the attention of Management. If a grievance is regarding a co-worker, employees are to attempt to resolve the problem amongst themselves. If this is not possible or the problem persists the matter is to be reported to the manager who will act as an intermediary.

III. Policies and Procedures

A. Employee Policies

Employment Categories

Each employee shall be designated as either NON-EXEMPT or EXEMPT from federal and state wage and hour laws.

NON-EXEMPT (hourly) employees shall be entitled to overtime pay under specific provisions of federal and state laws. This category generally includes persons involved in administrative duties (i.e., secretarial, receptionist, clerical) not in a supervisory role.

EXEMPT (salary) employees shall not be entitled to overtime pay and are excluded from specific provisions of federal and state wage and hour laws. This category generally includes professionals or administrative employees with supervisory responsibilities and/or exercising discretion and independent judgment relating to the management of the Company.

Additionally, each employee shall belong to one of the employment categories below:

REGULAR FULL-TIME employees are those who are not in a temporary status and who are regularly scheduled to work the Company's full-time schedule (i.e., a minimum of 30 hours per week). Such employees shall be eligible for the Company's applicable benefits package after three months (90 days) of service.

REGULAR PART-TIME employees are those who are not assigned to a temporary status and who are regularly scheduled to work less than the full-time work schedule but at least 20 hours per week. Regular part-time employees shall be eligible for Company's applicable benefits package after one year of service but are responsible for benefit costs.

TEMPORARY employees are those who are hired on a temporary and/or interim basis. Employment assignments in this category are of a limited duration. Employment beyond any initially stated period does not in any way imply a change in employment status. Temporary employees shall retain their status unless and until notified otherwise in writing. Temporary employees shall receive legally mandated benefits (such as worker's compensation insurance and Social Security) but are ineligible for participation in any benefits packages provided by the Company.

CONTRACT personnel are those who are retained to perform defined tasks as independent contractors. The work assignments may be given on an intermittent basis. This personnel category shall be classified as temporary and/or of a limited duration. Contract personnel shall be ineligible for the Company's benefit program. Contract personnel are responsible for all aspects of reporting and paying their Federal Income, State Income and FICA taxes. The Company will report the contract compensation to the IRS on form 1099.

Travel Stipend

Depending on the requirements of certain positions within the Company, some employees may be eligible to receive a travel stipend. This will be determined by Management and/or the Executive team and incorporated into the employee's offer letter for employment.

Employee Introductory Period

Upon initial hire, all employees will remain in an introductory period lasting 90 days. During this period, employees will have the opportunity to assess the Company and how well they fit within their respective office. During this period, Management will assess the employee's abilities and effectiveness. The period will begin with job training and the remaining 90 days will serve as a "trial" for both the employee and the Company. During this period, employees are not eligible for any benefits.

At the end of the 90-day introductory period, employees will receive an evaluation of their performance and the Company will determine if the employee is sufficient for the position. Though completion of the introductory period will ensure a permanent position for the employee, it does not change the "at-will" relationship (meaning the company or the employee both have the right to terminate the employment relationship "at-will"). Employees who wish to resign at the end of this probationary period are asked to give a two-week notice (*See Voluntary/ Involuntary Termination*).

Attendance and Absenteeism

When an employee anticipates being absent for reasons unrelated to proper use of sick time, they must inform their manager of any tardiness no later than thirty minutes before the start time of their regular workday and of any unscheduled absentee:

- 1) The moment an unscheduled absentee is determined;
- 2) By 7:00 am of the scheduled work day, or
- 3) One hour before the start time of their regular work day.

The employee must notify their supervisor directly via the supervisor's cell phone through voice call or text. The preferred method will be up to the discretion of manager and this method will be conveyed to employees during new hire orientation. Calling offices directly and/ or leaving a message on the office's answering machine is not a permissible means of reporting an absence.

More than three consecutive occurrences or consecutive/multiple occurrences will be subject to disciplinary action. Failure of notification is also subject to disciplinary action, to the extent of termination in the case of an unreported absentee and will in such case be considered a termination "for cause".

Hours of Work

Employees must follow established work schedules. Schedules vary due to employee schedule and location of office.

Meal and Rest Periods

Massachusetts employment law states an employer must provide a thirty-minute meal break during each work shift lasting more than six hours. This one, half-hour meal break, is unpaid. In addition, Massachusetts law does not require employers to provide any rest breaks. Employees can leave the office during their meal break. Non-exempt employees may not work during their meal breaks.

Under New Hampshire labor laws, employers cannot require an employee work more than five (5) consecutive hours without granting a thirty (30) minute lunch or eating period. If the employer cannot allow thirty (30) minutes, the employee must be paid if they are eating and working concurrently.

Connecticut labor laws require employers to provide employees a meal period of at least thirty (30) consecutive minutes if they have worked for 7½ or more consecutive hours. This meal period shall be given at some time after the first two hours of work and before the last two hours.

Overtime

Massachusetts: The state's overtime law indicates most employees must be paid one and one-half times their regular hourly rate for all hours worked in excess of 40 hours in a given work week. However, overtime rules in Massachusetts do not require overtime after eight hours in a day.

New Hampshire: The state requires an employer to pay one and one-half times an employee's regular pay rate for any hours worked over 40 a week. However, New Hampshire law does not require overtime pay for working on weekends or holidays, or more than eight hours in a day.

Connecticut: An employer shall pay one and one-half times the employee's regular rate of pay after 40 hours in the workweek. Overtime pay is due for actual hours worked over 40 hours.

Timekeeping

All employees are responsible for accurately reporting time worked. The Company will maintain an accurate record of the employee's time worked to calculate employee pay and benefits. Time worked includes all time an employee is required to be performing duties for the company. Time worked is used to determine overtime pay required for nonexempt employees.

Employees must accurately record the time they begin and end their work, as well as the beginning and end time of each meal period. They must also record the beginning and end time of any split shift or departure from work for personal reasons. Altering, falsifying, or tampering with time records or recording time on another employee's time record may result in disciplinary action, up to and including termination of employment.

Personnel Records

Employment law requires employers to grant current and former employees' access to their personnel records upon written request. Upon receipt of an employee's written request, the employer must respond within five business days. The employee must receive a paper copy of his/her personnel record AND the opportunity to view their records at the place of employment during business hours.

Massachusetts: State employment law prohibits employers with more than 20 employees from discarding or deleting information from an employee's personnel file until three years after the last date of employment. An employer with 20 or more employees must also maintain any portion of an employee's record relevant to a pending administrative or court case, even if that exceeds three years.

New Hampshire: Employers shall provide a reasonable opportunity for any employee who requests to inspect their personnel file and further, upon request, provide such employee with a copy of all

or part of such file. An employer may only charge the employee a fee reasonably related to the cost of supplying the requested documents.

If, upon inspection of his/her personnel file, an employee disagrees with any of the information contained in the file, and the employee and employer cannot agree upon removal or correction of such information, the employee may submit a written statement explaining his/her version of the information together with any applicable supporting evidence. This information shall be maintained as part of the employee's personnel file and will be included in any transmittal of the file to a third party and shall be included in any disclosure of the contested information made to a third party. The employer must keep a true and accurate record of all hours worked and all wages paid each employee. These records must be kept for a minimum of at least 3 years.

Connecticut: Employers are required to keep personnel files for one year following the termination of an employee's employment. Pertaining to employee access to personnel file, documentation of disciplinary action and notice of termination:

- 1) Each employer shall, not more than seven business days after receipt of a written request from an employee, permit such employee to inspect, and if requested, copy his or her personnel file, if such a file exists. Such inspection shall take place during regular business hours at a location at, or reasonably near, the employee's place of employment. Each employer who has personnel files shall be required to keep any personnel file pertaining to a particular employee for at least one year after the termination of such employee's employment.
- 2) Each employer shall, not more than ten business days after receipt of a written request from a former employee, permit such former employee to inspect, and if requested, copy his or her personnel file if such a file exists, provided the employer receives such written request not later than one year after the termination of such former employee's employment with the employer. Such inspection shall take place during regular business hours at a location mutually agreed upon by the employer and former employee. If the employer and former employee cannot agree upon a location to conduct such inspection, the employer may satisfy the requirements of this subsection by mailing a copy of the former employee's personnel file to the former employee not more than ten business days after receipt of the written request from the former employee.
- 3) Each employer shall provide an employee with a copy of any documentation of any disciplinary action imposed on that employee not more than one business day after the date of imposing such action. Each employer shall immediately provide an employee with a copy of any documented notice of that employee's termination of employment.

Payday

The payroll cycle begins on Monday and ends fourteen days later on Sunday. Payment is issued on a biweekly basis. Each paycheck will include earnings for all work performed through the end of the previous pay period.

If a regularly scheduled payday falls on a holiday, employees shall be paid on the last workday before the regularly scheduled payday.

Payroll Deductions

Federal and state law requires the Company to make certain deductions in employee paychecks. In addition, the employee may be part of company programs also requiring deductions such as medical insurance and 401k plans. All deductions are noted on each paycheck with its associated designation. If an employee has any questions regarding deductions, they may contact HR.

An employer cannot deduct money from a worker's pay unless the law dictates (such as wage withholding taxes), or the worker has asked for a deduction to be made for his or her own benefit (such as to put money aside in the worker's savings account).

Wage Garnishments

The Company adheres to The Federal Wage Garnishment Law, Consumer Credit Protection Act's Title III (CCPA) as it pertains to wage garnishments.

A wage garnishment is any legal or equitable procedure through which some portion of a person's earnings is required to be withheld for the payment of a debt. Most garnishments are made through court order. Other types of legal or equitable procedures for garnishment include IRS or state tax collection agency levies for unpaid taxes and federal agency administrative garnishments for non-tax debts owed to the federal government. Employee wages can be garnished without a court judgment for:

- 1) Unpaid income taxes;
- 2) Court ordered child support
- 3) Child support arrears, and
- 4) Defaulted student loans.

Wage garnishments do not include voluntary wage assignments in which employees voluntarily agree that their employers may turn over some specified amount of their earnings to a creditor or creditors.

Garnishment and assignment of wages are both methods of deducting money from an employee's salary to repay his or her debts. Garnishment is an involuntary procedure usually conducted when an employee has not paid a debt. Assignment of wages may be either voluntary or involuntary

Massachusetts: The most that can be garnished from your wages is: 15% of your gross wages (that is, before taxes or other deductions are taken out) or your disposable income less 50 times the greater of the federal (\$7.25/hour) or the Massachusetts hourly minimum wage (\$12.75/hour as of January 2020) per week.

New Hampshire: Under the 25 Rule, a creditor cannot garnish more than 25% of the employee's disposable income during any one pay period (often every two weeks). Therefore, if the employee's disposable income is \$1000, a maximum of \$250 can be garnished, meaning the creditor will withhold that amount from the paycheck and pay over the balance, i.e., \$750, to the employee.

Connecticut: The most that can be garnished from your wages are the lesser of the following two options:

- 1) 25% of your disposable earnings, or
- 2) The amount by which the employee's weekly disposable earnings exceed 40 times the federal hourly minimum wage (currently \$7.25/hour) or the Connecticut minimum fair

wage (currently \$12/hour, increasing to \$13 per hour in August, 2021), whichever is greater.

Performance Reviews

Each year, employees will receive a performance appraisal based on the employee's date of hire or the calendar year, at the discretion of Management. The performance appraisal process provides a means to discuss, plan, and review the performance of each employee. Performance appraisals influence salaries, promotions, and transfers, and it is critical supervisors are objective in conducting performance reviews and in assigning overall performance ratings.

The objectives for appraising employees are:

- 1) To document accomplishments of an employee during the appraisal period;
- 2) To provide the employee with performance measures and indicators for individual development;
- 3) To document skills of the employee so the Company can fully utilize employee capabilities.

Any raises or bonuses will be indicated during the appraisal.

The performance evaluation is a formal opportunity for the manager and the employee to discuss job performance and career objectives. Performance reviews are based on the responsibilities detailed in the job descriptions, as well as to adherence to the standards of conduct expected by the Company. They are the basis for such important personnel decisions such as merit raises, promotions, and termination of employment.

Each new employee will receive a formal or informal performance review after three months of employment as described in the probationary period section. After three months, each employee will receive a formal evaluation at least once a year with salary review where Management will determine if a raise has been earned and the extent of the raise. Management will base their evaluations on the written evaluation completed by the employee's immediate supervisor. If no raise is indicated, the administration will explain why and what can be done the following year to receive an increase in compensation. All evaluations will be kept in the employee's file.

Promotions

The Company believes in providing opportunities for its employees to advance within the organization. Promotion opportunities to positions of higher responsibility for existing employees will be limited only by the individual's ambition, attitude and qualifications in experience, education, and capabilities.

Promotion is the movement of an employee to a higher level, either within the same department or to another department due to a change in duties and not due to a market adjustment in salary. Any employee in good standing is eligible for promotion consideration, assuming he or she meets the minimum qualifications for the position.

All new vacant positions below the executive level are posted internally and are open to all eligible employees. Supervisors wishing to recommend a promotion for an employee because of a change in job duties being performed should review and revise the employee's job description in accordance with that employee's actual job duties, making note of major changes in responsibility that would warrant consideration of a promotion.

The employee's supervisor shall submit the employee's name, current responsibilities, new job description, and suggested salary to Human Resources. HR will review the documentation and compare it to market rate and the internal Company structure to determine if the recommendation should be supported, modified, or denied. HR will provide all documentation with a final recommendation to the Chief Operating Officer for final approval.

The salary offered for the new position will be determined primarily based on the employee's qualifications for the new position and internal equity within the department or work group. Employees can choose to accept, or decline offers without repercussions in their current position.

Transfers

The Company recognizes staff motivation, productivity, and retention are dependent upon people working in jobs well suited to their interests, and therefore offers and encourages transfer opportunities for current employees. The Company is supportive of employees who have the desire to enhance their skills or develop new competencies to pursue different or greater responsibilities internally.

An employee must be in his or her current position at least nine (9) months and be in good standing before he or she is eligible to apply for a transfer. The nine-month waiting requirement may be waived if the position is being adversely affected due to a reduction in the work force or job elimination, or if there is significant change in the terms and conditions of employment (e.g. work schedule, hours, salary, status, etc.).

In all cases, the employee's work record, including but not limited to performance, attendance, efforts to develop skills and related behavior, will be used as valid criteria for determining suitability for a position.

In consideration of the above factors, employees are required to provide documentation supporting their performance history, such as their last performance evaluation. For all positions, consideration will be given to the employee's demonstrated interpersonal skills, among other job-related factors, before making a final decision. Deficiencies in such skills or job-related factors may eliminate an individual from further consideration.

Transfer Eligibility Criteria:

- 1) Employed in current position for at least nine months.
- 2) Written confirmation of acceptable performance record/evaluation signed by the applicant's supervisor and completed no more than 18 months prior to date of transfer application (e.g. meets expectations, average rating, etc.).
- 3) Maintain an acceptable level of performance including but not limited to absence of corrective action and/or resolution of previous corrective action.

Reduction in Workforce

A. Layoff/Recall

If the Company determines it must reduce the workforce because of adverse economic or other conditions, then layoffs and recall from layoffs will generally be conducted in a manner consistent with the procedures described below.

I. Layoff

If a layoff is expected, the Company will attempt to communicate information about an impending layoff as soon as possible considering the Company's interests and compliance with state and federal notice requirements. Employees will generally be selected for layoff based on the following criteria:

- 1) Promotion potential and transferability of skills to other positions within the unit.
- 2) Demonstrated current and past performance.
- 3) The needs of the company and specific projects.
- 4) Length of service with the company.

An employee's length of service is measured from the original date of employment if there has not been a break in service greater than 30 days. Employees with breaks in service greater than 30 days, but less than one year, are credited only for their time actually worked; that is, the break in service time does not get credited in an employee's length of service unless required by law. Employees with a break in service greater than one year will receive credit for service from their most recent date of hire with the company.

Employees selected for layoff will be given as much notice as is required by law or as much as is reasonable under the circumstances. If the layoff is expected to exceed 30 days, unused vacation days accrued will be paid at the time of layoff. Employees who are laid off will not continue to accrue vacation or sick leave during the layoff.

II. Recall

Employees who are laid off will be maintained on a recall list for six months or until Management determines the layoff is permanent, whichever occurs first. Removal from the recall list terminates all job rights of the employee. While on the recall list, employees should inform HR if they become unavailable for recall. Employees who do not keep a current home address, phone number, and e-mail address on record with HR, will lose their right to be recalled.

Employees will be recalled according to the needs of the Company, the employee's job classification and ability to perform the job. Notice of recall will be sent to the employee by e-mail and registered mail, return receipt requested, to the employee's home address on record. Unless an employee responds to the recall notice within seven days following receipt of the notice or its attempted delivery, the employee's name will be removed from the recall list and the employee will no longer have any job rights with the Company.

Credit for seniority will continue to accumulate during any layoff of 30 days or less. Employees laid off for more than 30 days and subsequently recalled within six months from the date of layoff will be credited with the service accumulated at the time of layoff.

B. Voluntary/ Involuntary Termination

Regardless of employment category, both the employee and the Company have the right to terminate employment at any time. In the event an employee wishes to terminate their employment with The Company, the employee is expected to provide at least two weeks written notice. The Company reserves the right to release an employee due to, among other reasons, expiration or breach of contract, unsatisfactory employee performance, incompetence, or other consideration. However, misconduct on the part of an employee or a situation beyond the control of the Company could result in an immediate termination with little or no notice.

Most disciplinary action results in termination after repeat offenses and both verbal and written warning had been given prior (See Progressive Discipline). These offenses include, but are not limited to:

- 1) Unprofessional conduct;
- 2) Inability to perform assigned duties to satisfaction;
- 3) Constant failure to adhere to the policies and conduct set forth by this Manual;
- 4) Habitual tardiness or absence, with or without proper notice;
- 5) Constant poor hygiene;
- 6) Use of profanity or poor communication;
- 7) Improper dress;
- 8) Interference with work performance or another employee;
- 9) Spending work hours doing personal tasks, non-work-related activities, or work for third parties;
- 10) Selling, soliciting or distributing materials or literature without permission from management.

However, some actions will result in immediate termination with or without prior warning. These violations include but are not limited to:

- 1) Theft;
- 2) Embezzlement or fraud;
- 3) Insubordination;
- 4) Deliberate destruction or abuse of company-owned equipment;
- 5) Physical violence;
- 6) Unauthorized possession or use of controlled substances, or working under the influence of alcohol or drugs;
- 7) Disorderly, dishonest, illegal, immoral or unethical conduct;
- 8) Disclosing confidential information pertaining to patient care or Company business affairs;
- 9) Knowingly fail to adhere to HIPAA regulations;
- 10) Conviction, misdemeanor or felony;
- 11) Abuse of leave of absence or other leave policies;
- 12) Verbal or physical abuse to patients, employees, or co-workers;
- 13) Absence without notice for three successive scheduled working days;
- 14) Violating the Company non-solicitation and non-competition policy;
- 15) Association or allegation of a violent crime or instances of outside disruption to operations as a result of the violent crime.

Terminated employees will be assisted by their supervisor in following close-out procedures. In addition, all company material (e.g., keys, equipment, computer, manuals, etc.) must be returned. The employee should also provide passwords to any computer program or file of which only the employee has knowledge.

C. Progressive Discipline

Discipline in the workplace is the means by which supervisory personnel correct behavioral deficiencies and ensure adherence to established company rules. Disciplinary review and corrective-action policies provide workplace structure and establish guidelines for employee performance and behavior and add an essential component to the overall management system.

Disciplinary review and corrective action enforce workplace guidelines contained in the employee handbook, standard operating procedures manual, and employment agreements. The decision whether to engage in progressive discipline will be made at the sole discretion of the Company, and nothing contained herein requires the Company to use progressive discipline instead of using any other form of discipline, up to and including, termination. In the event progressive discipline is determined to be warranted for an employee, the office manager, area manager, or other management-level position, must first notify Human Resources of the circumstances.

Human resources will assess the misconduct and determine the appropriate step in which to proceed. Disciplinary action may include:

- 1) Verbal warning
- 2) Written warning
- 3) Suspension without pay, or
- 4) Termination of employment

Progressive discipline implies that, with respect to many disciplinary problems, these four steps will normally be followed. However, there may be circumstances when one or more steps are bypassed. The Company recognizes certain instances may be serious enough to justify either a suspension or, in extreme situations, termination of employment, without going through the usual progressive discipline steps. Examples of misconduct that may warrant progressive discipline include, but are not limited to:

- 1) Excessive tardiness;
- 2) Failure to notify of an absence;
- 3) Insubordination;
- 4) Rude or abusive language in the workplace;
- 5) Failure to follow the Company's Rules or Policies , i.e., not wearing safety equipment, not following correct cash handling procedures;
- 6) Dishonesty;
- 7) Theft;
- 8) Unwelcome physical contact.

D. Employee Exit Process

The purpose of this policy is to identify workplace, organizational or human resources factors that may have contributed to an employee's decision to leave the Company. It will enable the Company to identify any trends requiring attention or any opportunities to improve the Company's ability to respond to employee issues as well as allow the Company to improve and develop recruitment and retention strategies aimed at addressing these issues.

Employees are responsible for participating in the exit interview process on a voluntary basis. If an employee chooses to participate in an exit interview, he/she will be encouraged to be honest, candid, and constructive in their responses. The information received through an exit interview will be confidential. No specific information that could possibly be traced back to an ex-employee will be disseminated or discussed.

B. Company Policies

Diversity Policy

The Company strives to promote and encourage workplace diversity. It employs personnel of multiple cultures with team members who fluently speak multiple languages. The Company will not tolerate discrimination in any form and such occurrence will result in immediate termination.

Employing a diverse staff speaking multiple language creates a welcoming environment for patients from many cultures, and it is imperative our staff be sensitive to any and all cultural differences. In addition, employment and promotional decisions will not be based on race, sex, sexual orientation, age religion, or other protected characteristics, but on each employee's merit and success in serving our patients at the highest standards of professionalism.

Employees are permitted to speak another language when:

- 1) With a patient who expresses a preference the employee speak in a specific language.
- 2) On a break (including lunch).
- 3) When making personal telephone calls (on break or lunchtime).
- 4) In work areas outside the presence of clients, vendors, and patients.

Billing, Coding, and Reimbursement Standards

State dental boards require dental practices to use proper billing practices to obtain reimbursement for completed services. The Company recognizes the purpose for billing practices is to simplify paperwork, standardize procedures, prevent fraud and provide adequate measures of the provided care. The Company remains committed to ensuring reimbursement procedures comply with all federal and state laws, regulations, guidelines and policies. This commitment includes the adoption of the following procedures to ensure accurate billing of claims for services rendered and deemed medically necessary. The obligations of this policy are applicable to all employees.

The intentional submission for reimbursement of any claim that is not true, or which is fraudulent or fictitious in any material respect is absolutely prohibited. Any employee who engages in such conduct shall be subject to disciplinary action, up to and including termination of employment, in addition to any penalties which may be provided by law.

The Company will also take reasonable steps, including but not limited to the procedures set forth below, in an attempt to prevent accidental submission of any claim that is false or inaccurate.

The Company agrees to comply with the common coding definitions applicable for dentists, including evaluation and management services. Coding of all services rendered to patients shall be in accordance with those common coding definitions and coding decisions shall be based on the three essential criteria set forth in those coding definitions:

- 1) History
- 2) Examination
- 3) Dental treatment

Employees who provide services/procedures will report, and submit for billing, only those services/procedures which are completely and accurately documented in the patient's dental record.

Services or procedures performed on a patient will only be entered into the billing system for reimbursement following the submission of a completed service/procedure slip identifying the specific services/procedures rendered with the attestation of the caregiver that they have completed and documented the identified services/procedures. All data included in filed claims must be based on dental record documentation sufficient for proper auditing and verification.

Sufficient documentation may include, but shall not necessarily be limited to, the following:

- 1) Dental records which provide complete and accurate dental information to support the reported service(s)/procedure(s) were performed.
- 2) Provider and professional components of fees must be supported by patient records.

In addition, administrative services should be supported by contracts, description of services, etc. Patient services for all third-party payer types must be supported by logs, reconciliation, etc. Questions regarding reimbursement and supporting documentation must be resolved prior to submitting any claim for payment. Any questionable billings, errors, or lack of sufficient documentation must be reported immediately to management.

All employees will receive compliance training related to billing and reimbursement activities. Any employee who has knowledge of any discrepancy related to submission of a claim for reimbursement which is false or contains false information must report that problem to management or use the suggestion box. Failure to report a known discrepancy related to a claim for reimbursement will be grounds for disciplinary action.

Any employee who reports any discrepancy relating to a claim for reimbursement to the management, or who provides information in connection with any inquiry or investigation into any such alleged discrepancy, and who does so in good faith, will be protected from any retaliatory or disciplinary action.

All reimbursement and billing procedures contained in this policy will be integrated into the daily operations of the practice. Management will respond to all problems, concerns or questions related to reimbursement practices, and ensure that appropriate remedial actions are taken for any billing or reimbursement irregularities uncovered. Management will provide necessary training related to reimbursement practices, and that specialized training is provided to all reimbursement personnel by third party providers as may be appropriate.

Bulletin Boards

The Company will use physical bulletin boards to transmit information to employees. Bulletin board postings facilitate communication on various workplace and business activities. Though the Company also uses other means of communication (e.g., Intranet, electronic bulletin board, e-mail),

physical bulletin boards are useful in providing information to employees at a specific physical location.

The Company will maintain bulletin boards for workplace postings and company-approved business purposes. Workplace postings also provide federal, state and local workplace guidance required by law. Bulletin boards are located in areas of general employee access. All bulletin board postings can be approved by HR, Management, or the Executive team. Nothing herein restricts the rights of employees to engage in concerted activity pursuant to all applicable laws.

Surveillance Cameras and Telephone Monitoring

The Company may utilize a video monitoring system operating in specific public areas of the office. This is done to maintain the health and safety of the patients and staff. The videos are reviewed by Management and/or the Executive team only and done so under all relevant privacy and HIPAA laws and regulations. The affiliated offices of the Company are public spaces and employees should have no expectation of privacy except in bathrooms and changing areas.

The Company records all phone calls made to and from each affiliated office. This is done for training and quality assurance purposes. Management or the Executive team may listen to a recording of a phone call to ensure employees are being respectful and responsive to patients, or for other legitimate business purposes. Calls are also monitored for training purposes to critique communication skills and provide feedback for job performance as needed.

Employees may be monitored at any time during business calls without notification. Each employee's written consent to this policy will be obtained prior to his or her commencing employment with the Company and a signed copy of this policy will be placed in the employee's file. Patients will also be notified of possible monitoring. If a personal call is identified at any time during the telephone monitoring process, the monitoring will be immediately suspended. However, a continuous excessive level of nonbusiness-related phone calls by an employee will provide a basis for possible disciplinary action.

Email/ Computer/ Phone Use

The use of the Company's computers, fax machines and telephones are strictly governed by the guidelines of this Manual. Employees are not to make personal phone calls, send personal emails or instant messages or online chat messages, fax personal correspondence, make personal photocopies, mail or express-mail personal communications, or perform any other activities that utilize the Company's resources without providing compensation for such use.

The Company recognizes that, along with telephone usage, there will be occasional use of Company equipment to perform personal tasks; however, any extensive use of Company office, telephone, and computing equipment for one's personal affairs is inappropriate, not permissible, and grounds for disciplinary action. Examples of personal matters for which Company equipment may not be used under any circumstances include, but are not limited to:

- 1) Soliciting or conducting a commercial business;
- 2) Obtaining or soliciting pornography;
- 3) Seeking or interviewing for employment;
- 4) Violating copyright laws or other activities for personal gain or illegal purposes.

In addition, the use on a Company computer or introduction of software to the Company's system is expressly prohibited unless approved in writing by Management.

All communications made on the Company's equipment remain the Company's sole property. Employees are advised they should not have an expectation of privacy with regard to any e-mail communications, use of computers, or telephone conversations made on Company premises or equipment.

The Company, at its discretion, may reimburse certain employees for business calls made from a personal cellular phone. Calls made by those employees must be made sparingly and with discretion. Cellular calls will only be reimbursed when a regular phone is unavailable or not readily accessible.

While at work, employees are expected to exercise discretion when using personal cellphones. Excessive personal calls during the workday can interfere with employee productivity and be distracting to others. Employees are encouraged to make any personal calls during non-work time when possible and to ensure friends and family members are aware of the Company's policy. The Company will not be liable for the loss of personal cellphones brought into the workplace.

Personal Dress and Grooming

Employees of the Company represent professionalism and quality. The Company's professional atmosphere is maintained, in part, by the image it presents to its patients, visitors, and vendors. It is imperative all employees present to work with in a professional, neat, and well-groomed manner. The general standards for personal appearance, dress, and grooming include:

All Employees:

- 1) Moderation in jewelry, make-up, cologne, and perfume. Excessive jewelry and piercings of the tongue, nose, lip, or other unconventional items are distracting to patients and other staff, can be unsafe or unclean, and are prohibited at work at all times.
- 2) Only 2 piercings per ear are permitted.
- 3) Tattoos must be covered as much as possible. Extreme body altering and branding must not be visible.
- 4) Hair is to be clean, well groomed, and of a natural color (i.e. no pink, orange, blue).
- 5) Bodily odors are distracting and should be eliminated or otherwise reduced to avoid creating an uncomfortable environment for patients, guests, or other employees.
- 6) Appropriate and professional attire. Jeans are not allowed during normal business hours or when working with patients. Revealing or suggestive attire (such as shirts that expose the mid-section of the body or any clothes that reveal under garments) are prohibited. Shorts, flip-flops, sweat or exercise clothing, and other "casual" attire are not permitted.

Clinical Staff:

- 1) Fingernails are to be kept clean and cannot exceed a 1/8 of an inch from the tip of the finger. Only one color of nail polish is allowed. The shape of the nails must be smooth (round or square with rounded edges), no points. Gel and acrylic nails are permitted, however, clinicians with these nails must ensure proper hand hygiene at all times. Nail jewelry of any kind (gems, stones, etc.) is not permitted.

- 2) The size of earrings for all clinical staff cannot exceed the size of a quarter. Earrings larger than a quarter may become unsafe during patient care.
- 3) Clinical staff must ensure hair is pulled back and away from the face and shoulders.
- 4) The Company provides lab coats and scrub jackets for all employees who have an occupational risk of exposure to anything potentially infectious. This includes all clinical employees and anyone else who may be involved in the care of patients. Clinical staff are permitted to wear either scrub pants or slacks.
- 5) Clinical staff may wear tennis shoes/ running sneakers, but only if they are clean. Clinical employees are not permitted to wear open toed-shoes.

Administrative Staff:

- 1) Fingernails are to be kept clean and cannot exceed ¼ inch from the tip of the finger. Only one color of nail polish is allowed. Nail jewelry of any kind (gems, stones, etc.) is not permitted.
- 2) The dress code for administrative staff will either be business casual or scrubs. Business casual is defined as slacks and collared shirts for men and long skirts, slacks, blouses, and dresses for women, and dress shoes. Scrubs will consist of a scrub jacket and scrub pant. The dress code will be dependent upon the office and determined by Management.

The Company will make exceptions to the Personal Dress and Grooming policy set forth above to account for an employee's sincerely held religious beliefs, which may conflict. If an employee believes this policy conflicts with any of their sincerely held religious beliefs, they must contact the Executive team to discuss an accommodation.

In addition, smoking is strictly prohibited on company premises. Smokers must use their best efforts to remove the smoke-related odors from their person prior to returning to the office, particularly when working with patients.

Social Media

Employees are prohibited from using social media for personal use during work hours. Any utilization of social media for marketing or other promotion purposes must strictly adhere to any and all HIPAA regulations. Employees are not allowed to post or discuss information about patients, whether on their personal platforms or on their office's respective page. Employees are not allowed to post any confidential, negative, or potentially harmful material regarding another staff member, the office, or the Company as a whole. Employees who do not comply with the policy will be subject to disciplinary action, up to and including termination of employment and legal action.

Drugs and Alcohol

Employees are prohibited from using alcohol or any drug (except over-the-counter and prescription medications used according to direction) during work hours or while engaged in work-related activities, and provided that such use does not pose a threat to the health or safety of patients or other staff.

Even in the event a state permits/ legalizes, whether medicinal or recreational, a specific drug, its use is strictly prohibited during work hours and patient care. Failure to comply will result in corrective action up to and including termination.

Alcohol and drug use is a serious matter. In the event any employee has concerns that an alcohol or drug abuse problem may exist in the workplace or that any employee may be “under the influence” of alcohol or drugs, Management should be contacted immediately so appropriate corrective action is taken. When appropriate, the Company may refer the employee to approved counseling or rehabilitation programs or take appropriate disciplinary action including suspension and discharge. The unlawful sale, possession, or use of a controlled substance is strictly prohibited, and violators may be subject to immediate termination. All employees must notify the Company of any drug conviction within five days after such conviction.

The Company recognizes drug dependency and alcoholism as health problems. As members of the health care team, we are committed to providing help to any chemically dependent employee. We will assist the employee in meeting his or her responsibility to recover from substance abuse by treating him or her as any other employee with a medical condition. The employee would be covered by health, sick leave, disability, and other benefits according to Company. If an employee refuses or does not attempt to correct a substance abuse problem, the employee will be subject to disciplinary action up to and including dismissal, even for a first offense.

Violence and Weapons

The Company maintains a workplace safe and free of violence for all employees. Therefore, the Company prohibits the possession or use of dangerous weapons on Company property.

All employees are subject to this provision, as well as patients and visitors. A license to carry the weapon on company property does not supersede the Company’s policy. Any employee in violation of this policy will be subject to disciplinary action, up to and including termination.

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

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

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

IV. Benefits

Health Insurance

The Company offers three health insurance plans with Blue Cross Blue Shield of Massachusetts, two (2) PPO plan and a low-cost HMO option. The PPO plans have coverage is available both In-Network and Out-of-Network. For the HMO plan, employees are only eligible for services from a BCBS In-Network provider and are required to select a Primary Care Physician (PCP). The deductible(s) run on a plan year basis and reset annually. The Plan Year is from June to June on any given year. The Summary of Benefit & Coverage and Schedule of Benefits can be accessed at www.bcbsma.com.

Benefit	BCBS PPO 80 with Copay \$500 Deductible & HCCS		BCBS PPO 80 with Copay \$2000 Deductible & HCCS		BCBS HMO Access Blue NE Saver (HSA)
	In-Network	Out-of-Network	In-Network	Out-of-Network	In-Network Only
	* Indicates Service is Subject to the Deductible				
Preventive Office Visits	\$0	20%*	\$0	20%*	\$0
Non-Preventive Physician Visits	\$30	20%*	\$30	20%*	\$15 PCP* / \$25 Specialist*
X-rays, Lab tests	Low: 20%* High: 30%* for hospitals; 20%* for other providers	40%*	Low: 20%* High: 30%* for hospitals; 20%* for other providers	40%*	0%*
MRI's, CT scans, PET scans	Low: 20%* High: 30%* for hospitals; 20%* for other providers	40%*	Low: 20%* High: 30%* for hospitals; 20%* for other providers	40%*	0%*
Routine Eye Exam	\$0	20%*	\$0	20%*	\$0
Emergency	\$250	\$250	\$150	\$150	\$150*
Day Surgery	Low: \$250* High: \$1,250* for hospitals; \$250* for other providers	20%*	Low: \$250* High: \$1,250* for hospitals; \$250* for other providers	20%*	0%*
Hospitalization	Low: 20%* High: 30%*	40%*	Low: 20%* High: 30%*	40%*	0%*
Mental Health	\$30	20%*	\$30	20%*	\$15*
Prescription	\$15/\$30/\$50	\$30/\$60/\$100	\$15/\$30/\$50	\$30/\$60/\$100	\$10/\$25/\$45*
Mail-Order Prescriptions	\$30/\$60/\$150	Not covered	\$30/\$60/\$150	Not covered	\$20/\$50/\$135*
Deductible	Individual \$500 / Family \$1,000		Individual \$2,000 / Family \$4,000		Individual \$1,500 / Family \$3,000
Out of Pocket Max	Ind-\$5,450 / Fam-\$10,900 Rx: \$1,000 / \$2,000		Ind-\$5,450 / Fam-\$10,900 Rx: \$1,000 / \$2,000		Ind-\$6,450 / Fam-\$12,900

Low: Last Cost Hospital, High: High Cost Hospital. Please refer to Hospital Cost Sharing (HCSS) hospital list for more information.
* Indicates services is subject to deductible

Dental Insurance

The Company offers Blue Cross Blue Shield Dental Blue Voluntary plan to eligible employees. The benefit summary and plan details can be accessed at www.bcbsma.com.

Service	Plan Covers
Type I: Preventative	100%
Type II: Basic Restorative	80%*
Type III: Major	50%*
Maximum Benefit: \$1,500	
* Deductible Applies: \$50-Individual / \$150-Family	

Vision Plan

The Company offers a vision plan to eligible employees through VSP The benefit summary and plan details can be accessed at www.vsp.com.

Service	Plan Covers
Routine Eye Exam	\$10 copay (1 every 12 months)
Lenses	\$25 material copay (every 12 months)
Frames & Contacts	\$130 max allowance toward frames and contact lenses (every 24 months)

Open Enrollment

Each year, open enrollment will run from June 1st through the mid-June. No action is required to continue an employee's medical, dental, and vision coverage. However, if an employee wishes to alter his or her benefit selections for a new medical plan offering, or make changes in personal preferences or family needs, this must be performed during open enrollment.

Open enrollment is the only time during the year when an employee is able to make changes or enroll in medical, dental, and vision benefits unless they have a qualifying event (e.g. marriage, birth, or change in spouse's job status). If an employee is declining benefits, they must go online to ensure he or she has waived coverage, or they can request a paper waiver form from their supervisor.

Flexible Spending

The Company offers employees the opportunity to open a flexible spending account through Paychex. A flexible spending account (FSA) is a tax-advantaged account for employees to designate part of their earnings to pay for qualified expenses. Monies deducted from employee earnings into an FSA account are not subject to payroll taxes, resulting in savings for the employee.

Employees selecting benefits from an FSA make contributions from pre-tax dollars. This equates to savings to the employee since they save federal and state income taxes on the amount contributed, as well as on Social Security taxes. The employee authorizes the employer to withdraw money to place in their FSA account from their payroll check. If the employee reduces the amount of their taxable income, they can maximize the amount of money they take home.

The amount of money an employee has deducted pre-tax from their paychecks for FSA-qualified benefits must be used in the calendar year of the withholdings, or else it is forfeited. Therefore, employees must evaluate anticipated expenses for dependent care or medical expenses, so the amount of monies put into the FSA accounts is adequate for their needs.

401K

The Company offers employees the opportunity to accumulate financial resources for retirement through Paychex. Employees are eligible to contribute to the 401(k) Plan following the initial probationary period.

Employee contributions are subject to statutory limits on tax deductibility. The plan will allow each employee to elect how much of their salary they want to contribute to their plan and to direct the investment of their funds into professionally managed investment funds. An employee is fully vested in his or her own contributions and entitled to those contributions upon termination of employment regardless of the length of employment. The Company does not contribute funds to employees' contributions.

Voluntary Benefits

The Company offers all eligible employees (20+ hours) the opportunity to purchase voluntary benefits coverage through Colonial Life. These offerings include Term Life insurance, Whole Life Insurance, Short Term Disability, Accident Insurance, Cancer Insurance, Critical Illness, and others. These benefits are designed to provide an employee with paid benefits if they are unable to work

due to an accident or illness. This plan is 100% employee paid. Benefit summary can be accessed at www.coloniallife.com.

Paid/ Unpaid Days Off

Regular full-time employees will be eligible for coverage in accordance with the terms and conditions of the Company's policies and qualified plans, as they become available. Any benefit offered by the Company to its full and part time employees may be changed at any time upon notice in the sole discretion of management, except for those benefits that are required by law.

Paid Time Off and Paid Sick Leave ("PTO") (Full-time employees only)

PTO is planned absence from work, including vacation, sick leave, time for doctor's appointments, and all other personal matters other than a paid holiday. PTO is a benefit for demonstrated service to the Company and is not an entitlement based on age or experience. Full time personnel are qualified for combined PTO and paid sick leave (referred to as "PTO"). This applies to all regular staff members. Doctors have a separate vacation agreement within each individual employment contract. Part-time employees are not eligible for PTO.

Eligibility for PTO begins at the start of employment but cannot be used until after the employee's 3 month probationary period. If an employee leaves on his or her own or is terminated within 90 days of employment, the employee can keep the employee's accrued PTO. The Company encourages all personnel to make regular use of their accrued PTO. PTO hours are accrued for regular full-time employees as follows:

- 1) 40 hours a year (1.54 hours each pay period) for the 1st year of employment;
- 2) 80 hours a year (3.08 hours each pay period) for the 2nd year of employment;
- 3) 120 hours a year (4.62 hours each pay period) for the 5th year of employment.

Full-time employees may carry over a maximum of 40 hours of combined PTO and paid sick leave each calendar year. For scheduled or unscheduled time off or sick time, the Company requires employees use their accrued PTO to make up for missed/ lost work hours. No employee may take an unpaid day if they have PTO hours in their bank. If an employee requests time off and they do not have enough accrued PTO to cover the requested days, it is up to the discretion of Management to approve the request.

Part-time employees are eligible to accrue 1 hour of paid sick leave for every 30 hours worked up to a maximum of 40 hours, even though they are not eligible for PTO.

Paid Sick Leave (Part-time Employees)

Part-time employees are only eligible for paid sick leave, as required under Massachusetts Paid Sick Leave Act. Part-time employees are eligible to accrue 1 hour of paid sick leave for every 30 hours worked up to a maximum of 40 hours. The paid sick leave can be used to:

- 1) Care for his or her child, parent or spouse's parent who is suffering from an illness or medical condition requiring home care, professional medical diagnosis or care, or preventive care;
- 2) Care for his or her own physical or mental illness, injury or medical condition requiring medical diagnosis or care, or preventive medical care;

- 3) Attend his or her own routine medical appointments or those of his or her child, spouse, parent, or spouse's parent;
- 4) Address the psychological, physical or legal effects of domestic violence.
- 5) Travel to and from an appointment, pharmacy, or other location related to the purpose for which sick time may be taken.

Paid sick time is not in addition to regular paid time off (PTO) accrued by an employee, but allows employees with less paid time off to use the Massachusetts statute requiring paid sick leave to supplement that paid time off. The Company provides equal to or more than the amount of PTO required by law, and thus, in very few instances, would the law apply to full-time employees.

Under the Massachusetts Paid Sick Act, accumulated paid sick leave carries over into the following calendar year only to the extent that the employee has not earned at least 40 hours of paid sick leave in that following calendar year. No employee may use any more than 40 hours of paid sick leave in any calendar year. If an employee leaves on his or her own or is terminated within 90 days of starting employment, the employee is not eligible to take accrued paid sick leave.

Holiday Pay

The purpose of paid holidays is to provide staff with continuity of income for time off during the normal work week, where they may otherwise not be paid for those days the office is closed. Additionally, the company observes any unpaid holidays *required* by local, state, and federal law. The Company observes the following paid holidays during each calendar year, which become paid holidays *only after* the initial 3-month probationary period:

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

On these observed holidays, all offices will be closed. If a paid holiday falls on a weekend, it will be observed on the Friday before or Monday after and all offices will be closed. Only full-time staff will receive regular pay based on an eight-hour workday. Part-time staff and staff in their probationary period are not eligible for holiday pay. The Company reserves the right to change this policy at any time upon notice to the staff.

Eligibility for Paid Holidays

All full-time employees will receive holiday pay at their regular rate of pay (based on an eight-hour workday, provided they meet the following conditions:

- 1) Work a full shift on the employee's last scheduled work shift prior to the paid holiday.
- 2) Work a full shift on the employee's first scheduled work shift following the holiday.
- 3) Should the employee be unable to work either of these two days because of illness, proof of illness will be required to qualify for the paid holiday.

Employees *will not* be entitled to holiday pay in the following circumstances:

- 1) The employee has not successfully completed the 90-day introductory period.
- 2) The employee is in out-of-pay status or in layoff status.
- 3) The employee is on unpaid leave of absence on the holiday.
- 4) The employee is a part-time employee.

If an observed holiday falls on an eligible employee's vacation day, it may either be counted as a holiday instead of a vacation day or be added to the vacation period as an extra day of vacation. Holiday pay is not to be considered hours worked in the computation of overtime. The Company reserves the right to change this policy at any time upon notice to the staff.

Bereavement

All full-time employees after 90 days of employment may take three paid days off from work in the event of a death in the immediate family (*spouse, children, sibling, parent/s and spouses' parent/s*). Part-time employees may take one paid day off for the same. All full-time employees after 90 days of employment may take one paid day off from work in the event of a death in the extended family (*grandparent/s, cousin, aunt/uncle*). Non-paid bereavement days may be taken for non-immediate/extended family members. Employees must notify their manager and request the day(s) they plan to miss.

Election Day Policy

Employees are encouraged to plan for voting that does not conflict with their work schedule. If this is not possible, employees must discuss with their manager their reasoning why they must vote during work hours and their manager will determine a time of the day they may temporarily leave work to vote. Election day absences are not paid by the employer.

Inclement Weather Policy

The Company may need to close an office due to inclement weather, "snow days". This will be determined by the Executive team. If an employee believes the office may be closed due to weather they are to contact their manager for confirmation. In addition, managers will contact all employees under their responsibility the moment management decides to close the office. Snow days are unpaid for non-exempt workers.

V. Safety

The Company is committed to maintaining a safe work environment for all employees. The Company's safety standards comply with all federal, state, and local laws, including those regulated by the Occupational Safety and Health Administration (OSHA), the Department of Labor, state licensing boards, and the local boards of health. Upholding safety is a shared responsibility of the Company and its employees. All employees are expected to observe the company's safety rules and perform duties in a cautious manner.

Employer's Responsibility

The Company's Chief Compliance officer will develop, implement, and monitor all quality assurance, quality improvement, risk management, clinical compliance, and safety protocols and procedures. This includes, but is not limited to:

- 1) Monitoring the implementation and maintenance of compliance activities, systems, and procedures through biannual inspections to ensure adherence to all applicable state and federal laws and regulations, including but not limited to, the Health Information Portability and Accountability Act (HIPAA), the Occupational Safety and Health Administration (OSHA), the Centers for Disease Control and Prevention (CDC), Department of Environmental Protection, Department of Radiation Control, and state dental boards.
- 2) Routinely reviewing the Company's quality and compliance protocols and systems and making revisions when necessary.
- 3) Ensuring each employee is aware of their responsibilities pertaining to safety under these protocols through training.
- 4) Reviewing the Company's safety protocols periodically and updating when necessary.
- 5) Verifying inspection records and locations of all emergency units and equipment.

OSHA

The following written policies are available to all employees and can be accessed on the Company's Intranet as well as on-site within each office. They will be made available during the employee's initial orientation and the employee will sign an acknowledgement recognizing their understanding of the policy. Employees will always be expected to comply with the content of these policies during their employment.

Hepatitis B Vaccine

OSHA's Bloodborne Pathogen standard mandates all at-risk employees must have the Hepatitis B vaccine made available to them within 10 calendar days of their initial assignment.

Provisions for vaccination during training of at-risk personnel are recommended, not only to increase vaccination rates among personnel, but to prevent infection among trainees as they practice new techniques. The CDC does not recommend pre-vaccination screening for antibodies to Hepatitis B surface antigens unless the employer deems it economically feasible. However, post vaccination screening, one to two month following completion of the vaccine series, is advised for those with ongoing risk of blood exposure. This will determine if the response to the vaccination

has occurred. If an employee's serologic test comes back negative for anti-HB's, the employee is considered a non-responder to the Hepatitis B vaccination. The employee should be counseled that non-response to the vaccination series most likely means that the employee is susceptible to HBV infection. It is possible, however, that the employee is chronically infected with HBV and Hepatitis B surface antigen (HbsAg) testing should be recommended. Counseling of the employee should be performed to discuss what nonresponse to the vaccination series means for that specific employee and what steps should be taken in the future to protect his/her health.

Post exposure prophylactic (PEP) treatment and/or vaccination is dependent on the Hepatitis B surface antigen status of the source and the immunization status of the exposed employee. Following an exposure incident, the vaccine should be offered to any unvaccinated person. If the source is known to be Hepatitis B surface antigen positive, then Hepatitis B immunoglobulin (HBIG) should be administered within 24 hours as HBIG efficacy diminishes if treatment is postponed for even as little as three days. For non-responders, the CDC recommends a single dose of HBIG and a single dose of Hepatitis B vaccine immediately post exposure. PEP recommendations for vaccinated workers vary and should be decided on an individual case basis.

Exposure Control

The purpose of the Company's Exposure Control Plan is to minimize the risk of transmission of bloodborne pathogens and other infectious agents to clinical employees during instances of occupational exposure to blood or Other Potentially Infectious Materials (OPIM). The protocol is based on the rules and regulations of the Occupational Safety and Health Administration (OSHA) as outlined in The Code of Federal Regulations document 29 CFR Part 1910.1030 entitled "Occupation Exposure to Bloodborne Pathogens." The written ECP includes the following:

- 1) Risk Exposure Determination
- 2) Universal/Standard Precautions
- 3) Engineering and Work Practice Controls
- 4) Personal Protective Measures/ Equipment
- 5) Housekeeping
- 6) HBV Vaccination Program
- 7) Post-Exposure Evaluation, Follow-Up, and Post Exposure Prophylaxis (PEP)
- 8) Identification of Hazards to Employees
- 9) Information and Training Program
- 10) Recordkeeping Requirements

The Company's Chief Compliance Officer is responsible for the management of the ECP and will review and update it annually and/or whenever changes in procedures create new occupational exposures. The ECP is available to all employees, as well as OSHA, and other regulatory representatives.

Infection Control Protocol

The purpose of the Company's Infection Control Protocol is to minimize the risk of transmission of bloodborne pathogens and other infectious agents between patients and clinical employees. The protocol is based on the rules and regulations of the Occupational Safety and Health Administration (OSHA) as outlined in *The Code of Federal Regulations* document 29 CFR Part 1910.1030 entitled "Occupation Exposure to Bloodborne Pathogens," as well as the Centers for Disease Control and

Prevention's (CDC) *Guidelines for Infection Control in Dental Health-Care Settings* (2003). The written ICP includes the following:

- 1) Standard Precautions
- 2) Hand Hygiene
- 3) Personal Protective Equipment
- 4) Personal Appearance
- 5) Instrument Processing
- 6) Biological Monitoring
- 7) Sterilization and Disinfection
- 8) Waterline Maintenance
- 9) Sharps and Regulated Medical Waste
- 10) Environmental Infection Control

The Company's Chief Compliance Officer is responsible for the management of the ICP and will review and update it annually and/or whenever changes in procedures create new regulations concerning infection control. The ICP is available to all employees, as well as OSHA, and other regulatory representatives.

Hazard Communication Plan/ GHS

The purpose of the Company's Hazard Communication Plan (HCP) is to ensure employees are trained and educated about any and all chemical hazards within the workplace to reduce risk and improve safety. This protocol is based on the rules and regulations of the Occupational Safety and Health Administration (OSHA) as outlined in *The Code of Federal Regulations* document 29 CFR Part 1910.1200 entitled "Occupational Safety and Health Standards." The written HCP includes the following:

- 1) Exposure Determination
- 2) Hazardous Chemical Inventory
- 3) Safety Data Sheet (SDS) Catalog
- 4) Labeling System
- 5) Managing a Chemical Spill
- 6) Ongoing Training

The Company's Chief Compliance Officer is responsible for the management of the HCP and will review and update it annually and/or whenever changes in procedures create new regulations concerning chemical safety. The HCP is available to all employees, as well as OSHA, and other regulatory representatives.

Respiratory Protection Program

The purpose of the Company's Respiratory Protection Program is to protect employees against any adverse health effect caused by the inhalation of contaminants in the work environment. This protocol is based on the Occupational Safety and Health Administration's (OSHA) Respiratory Protection Standard (29 CFR 1910.134). The written RPP includes the following:

- 1) Procedure for Selecting Respirators
- 2) Medical Evaluation of Employees
- 3) Fit Testing Procedures

- 4) Procedures for the Proper Use of Respirators
- 5) Training

The Company's Chief Compliance Officer is responsible for the management of the RPP and will review and update it annually and/or whenever changes in procedures create new occupational exposures. The RPP is available to all employees, as well as OSHA, and other regulatory representatives.

Sharps Safety

The purpose of the Company's policy for Sharps Safety in the Dental Setting is to minimize the risk of needle sticks and sharps injuries and reduce the potential transmission of bloodborne pathogens and other infectious agents between patients and clinical employees. The protocol is based on the rules and regulations of the Occupational Safety and Health Administration (OSHA) as outlined in The Code of Federal Regulations document 29 CFR Part 1910.1030 entitled "Occupation Exposure to Bloodborne Pathogens," as well as the Centers for Disease Control and Prevention's (CDC) Guidelines for Infection Control in Dental Health-Care Settings (2003). Common causes of sticks, scratches and cuts experienced by workers within a dental office as it relates to sharps, include but are not limited to:

- 1) Burs left in the handpiece, sitting upright in the bracket holder;
- 2) Aluminum or stainless steel crowns;
- 3) Exposed end of an orthodontic arch wire;
- 4) Laboratory knives;
- 5) Scalers, explorers, blades, needles or other sharp instruments;
- 6) Cavitron scaler tips which are exposed in the field of operation;
- 7) The transport of instruments from the operatory to the instrument sterilization area;
- 8) The processing, handling, and packaging of scalers, explorers, and other instruments for sterilization.

The Company's Chief Compliance Officer is responsible for the management of the Sharps Safety Policy and will review and update it annually and/or whenever changes in procedures create new occupational exposures. The Sharps Safety Policy is available to all employees, as well as OSHA, and other regulatory representatives.

Emergency Preparedness

The Company has a written medical emergency response plan and fire safety plan to responsibly manage emergencies within the offices.

A. Building Safety, Fire, and Evacuation

Employees will be shown all possible evacuation routes within the office during their orientation and training. The exits must remain unobstructed, easily unlocked and clearly marked. Each office will be responsible for maintaining their office's fire detection and alarm systems and ensuring fire extinguishers are in proper working order. In addition, each office will perform fire safety training one time per calendar year.

If a fire breaks out in the office, employees should immediately notify their manager and/or pull the closest fire alarm, if applicable. When the alarm sounds, all employees must exit the building, quickly and safely. If the office is located in a professional building, employees must use the stairs, not the elevator, to evacuate. Employees are not expected to fight the fire, nor should they stop to retrieve personal belongings. All staff will convene in the office's designated meeting location outside of the office. The office manager will be responsible to ensure all employees are accounted for as well as report anyone missing to the fire department. All other emergency evacuations will follow the same procedure.

B. Medical Emergency

In the case of a medical emergency, employees must inform the doctor immediately and call the paramedics. The doctor should responsibly manage the emergency until emergency personnel arrive utilizing the necessary available emergency medication and equipment available in the office. First aid supplies are available for use by employees, patients, or visitors. The management of the patient must be documented and retained in the patient chart including: symptoms, time of symptoms, support services, drugs administered (time and dosage), referrals or calls for support services, progression of patient's signs and symptoms, and instructions given to the patient.

Each office will perform medical emergency training throughout the calendar year. This training will encompass possible scenarios such as syncope, cardiac arrest, diabetic incident, stroke, seizure, and overdose. Proof of each training will be retained on-site with the required documentation. All clinical staff must be trained in basic life support (BLS) as required by state licensing boards. On-site BLS training will be provided to clinical staff on a biennial basis using an American Heart Association- approved instructor.

Occupational Injury/ Workman's Compensation

Any on-the-job accident, injury or job-related illness may make an employee eligible for worker's compensation. All accidents resulting in injury must be reported to the appropriate manager, regardless of how insignificant the injury may appear. Such reports are necessary to comply with laws and initiate insurance and workers' compensation procedures. If an employee believes any injury or illness may qualifies them for worker's compensation, they must notify their manager and Human Resources.

Employee Acknowledgement

I hereby confirm that I have received my copy of the Employee Manual of Family Orthodontics/New England Family Dentistry (the “Company”).

The Employee Manual describes important information about the Company and I understand I should consult the Executive Team regarding any questions not answered in the handbook.

I understand and agree that nothing contained herein or in the Employee Manual changes my status as an at-will employee.

I understand and agree that this manual and the policies and procedures contained herein, supersede any and all prior practices, oral or written representations, or statements regarding the terms and conditions of my employment with the Company.

I understand that, except for employment at-will status, any and all policies and practices may be changed at any time by the Company, and that the Company reserves the right to change my hours, wages and working conditions at any time. All such changes will be communicated through official notices, and I understand that revised information may supersede, modify, or eliminate existing policies.

I understand that it is my responsibility to read and comply with the policies contained in this handbook and any revisions made to it.

Employee's Signature

Employee's Name (Print)

Date