

Telecommuting

Introduction

This telecommuting policy establishes SterlingRisk's guidelines on telecommuting to the office, as well the parameters for employees who receive Telecommuting Arrangements. As discussed in greater detail herein, employees are **not entitled** to telecommute to the office. Whether employee is otherwise permitted to telecommute is subject to SterlingRisk's discretion and operational needs. SterlingRisk may, at any time, rescind or modify a Telecommuting Arrangement and/or prohibit any employee from telecommuting.

Telecommuting Arrangement Defined

A "Telecommuting Arrangement" shall be defined as an arrangement in which an employee either works from home or another remote location on a regular basis for at least one or more full days per week. The definition of "Telecommuting Arrangement" shall not include SterlingRisk's approval of isolated requests to telecommute on an individual day, or an occasional basis. Given the need to adequately train and supervise newly hired employees, and employees who are on a Professional Development Plan ("PDP"), any employee who is within Introductory Period (or any extension thereof), as defined in SterlingRisk's Employee Handbook, or placed on a PDP, may be required to report to the office up to four (4) days per week, and may telecommute for the remaining day(s) of their regularly scheduled week, subject to manager review and approval. The specific days in which an employee is permitted to telecommute under this model shall be determined by the employee's supervisor or management.

SterlingRisk, at its sole discretion, may rescind, alter, or modify any Telecommuting Arrangement at any time.

Guidelines For Telecommuting

Telecommuting is not a right of employment, and employment with the Company is at will. Thus, whether an employee shall receive a Telecommuting Arrangement or be permitted to telecommute will depend on a variety of factors. These factors shall include, but not be limited to, the employee's: (a) job performance, (b) attendance, (c) responsiveness, (d) ability to work independently; (e) the impact that telecommuting will have on SterlingRisk, its clients and/or the individuals who work with the employee; (f) the nature of the employee's work; and (g) whether a governmental shutdown of onsite business operations is necessary for public health and/or safety considerations. The employee's supervisor or SterlingRisk shall have the discretion to rescind approval of any individual telecommuting request, as well as modify or revoke a Telecommuting Arrangement.

Notwithstanding any approved Telecommuting Arrangement, all employees are required to report to the office to attend mandatory meetings and trainings, regardless of whether such meetings or trainings are scheduled on a designated "telecommuting" day.

Employees who reside outside of the New York metro area, or report to a branch office in any other state, are required to reach out to their manager and Human Resources before booking any travel arrangements or accommodations.

Management of Employees on Telecommuting Arrangements

Supervisors are expected to regularly evaluate and manage the performance of any employee on a Telecommuting Arrangement. At any point during the employee's Telecommuting Arrangement, the employee's supervisor may schedule an evaluation with the employee to discuss the status of the Telecommuting Arrangement. These evaluations can be conducted with or without notice to the employee, and may be conducted via telephone, Skype, Zoom, Microsoft Teams, web-conference, or any other communication method.

This evaluation may include but will not be limited to: (a) whether the employee clearly understands SterlingRisk's expectations while telecommuting; (b) the employee's level of productivity; (c) whether SterlingRisk's business needs are being met; (d) whether the employee's response time has been impacted by the Telecommuting Arrangement; and (e) whether there are any adjustments that need to be made to the Telecommuting Arrangement.

Based on such evaluation, the employee's supervisor or SterlingRisk shall decide whether to modify or continue the Telecommuting Arrangement. The determination as to whether to modify or continue a Telecommuting Arrangement shall be made on a case-by-case basis, based on SterlingRisk's operational needs and the above-mentioned considerations. Employees will be provided with notice in the event their Telecommuting Arrangement is discontinued or modified.

Employee Relocations

An employee who is seeking to relocate outside of the New York metro area and work under a full-time Telecommuting Arrangement must complete a Telecommuting Application Form and receive prior written approval from his or her manager and Human Resources before relocating. The law of the state where the employee performs his or her work generally governs the employment relationship, even if the employer is located somewhere else. It is therefore critical that SterlingRisk is notified in advance, and approves, any potential employee relocation.

Equipment/Internet Connection Required For Telecommuting

Employees are directed to SterlingRisk's "Work From Home Technology Guide" for detailed guidance on the equipment and internet connection that is required while telecommuting. To that end, any employee who telecommutes must ensure that the remote location where they are performing work is equipped with equipment that would allow them to effectively perform their duties.

Office supplies will be provided by SterlingRisk as needed. Any out-of-pocket expenses for other supplies will not be reimbursed, unless the employee has the prior approval of my supervisor. SterlingRisk is not responsible for purchasing, repairing, servicing, or maintaining any telecommuting equipment that is not owned by SterlingRisk. Furthermore, SterlingRisk shall not be responsible for reimbursing the employee for any costs associated with the purchase, repair, servicing, or maintenance to personal equipment utilized by the employee while telecommuting.

Equipment/Internet Connection Issues

In the event that any equipment that is relied upon in telecommuting is not operational or impacts an employee's productivity or response time, the employee shall be required to report to their assigned physical office on that day or make a request for PTO in accordance with SterlingRisk's

Employee Handbook. In the event that the employee's supervisor or SterlingRisk determines that an employee has experienced a pattern of operational issues with their equipment/internet and/or a disruption substantial enough to impact the employee's productivity, SterlingRisk, in its sole discretion, may modify or rescind the employee's Telecommuting Arrangement and/or prohibit the employee from telecommuting in the future.

The requirements set forth in this section shall apply irrespective of whether any equipment utilized by the employee is personally owned or provided by SterlingRisk.

Extension of the Workplace Any employee who telecommutes must understand that the remote location that employee is performing work constitutes an extension of the workplace. As such, all employees are expected to perform their responsibilities as if they were reporting to the office and must comply with all of SterlingRisk's directives and policies, including, but not limited to, its harassment and discrimination policies. In the event an employee violates any of SterlingRisk's policies while telecommuting, he or she shall be subject to discipline, up to and including termination.

Employees who telecommute must work in a remote location in which they are capable of performing their responsibilities in an efficient and professional manner. Any employee who telecommutes agrees to be available during the assigned business hours, for communication by phone, voice mail, email, etc. In the event that the employee's supervisor or SterlingRisk determines that an employee has telecommuted from a remote location that is not conducive to the work environment (noise levels, pollution, other distractions) or otherwise unsuitable to perform his or her responsibilities in an effective manner, SterlingRisk, in its sole discretion, may modify or rescind the employee's Telecommuting Arrangement and/or prohibit the employee from telecommuting in the future.

Dependent Care

Remote work is not a substitute for ongoing childcare or adult care with the exception of catastrophic events where a continuity of operations plan is in place. Employees who are telecommuting agree that they are not the primary care provider for any dependent during work hours and have made dependent care arrangements during telecommuting hours.

Security and Compliance with SterlingRisk Policies

Any employee who telecommutes shall be expected to ensure that any documentation and/or information covered under SterlingRisk's Confidentiality Policy is adequately protected whenever work is performed from a remote location. The security measures that shall be taken by the employee shall include, but not be limited to, utilizing locked file cabinets and desks, ensuring that electronic systems are password protected, working from secure locations, and that work is performed on a stable and secure internet connection. For information regarding SterlingRisk's internet connection standards, please refer to SterlingRisk's "Work From Home Technology Guide." All employees who telecommute are required to abide by SterlingRisk's policies for employees, including those covering information, security, software, software licensing and data privacy, conflicts of interest, outside employment, ethics, conduct as well as the requirements of applicable state and federal government statutes. All equipment, information, documents records, and materials provided by SterlingRisk remain the property of SterlingRisk. Any information or

documents used or created by an employee on a Telecommuting Arrangement in the performance of his or her work assignments are the property of SterlingRisk.

Employees on a Telecommuting Arrangement are required to abide by SterlingRisk's information security requirements with regards to the protection of sensitive or confidential information from unauthorized or accidental access, use, modification, destruction, or disclosure. All suspected information security incidents must be reported as quickly as possible to an appropriate member of the Information Security & Compliance Team.

Time Worked

All employees who telecommute are required to follow established time and attendance policies as set forth in the SterlingRisk Employee Handbook.

Non-Exempt employees will be required to accurately record all time worked as directed by SterlingRisk via ADP Time & Attendance. In order for employees to accurately record all time worked, employees must clock in at the start of the of the workday, out/in for meal breaks, and clock out at the end of the workday. Employees may only work hours in excess of their scheduled shift with advance approval of the employee's supervisor and/or manager. Employees who fail to comply with these requirements are subject to discipline, up to and including termination. Exempt employees are expected to be accessible and online throughout the workday.

Paid Time Off

Before an employee on a Telecommuting Arrangement may take paid time off ("PTO"), employee must obtain approval from a supervisor or manager in accordance with SterlingRisk's established procedures. Employees must use available PTO for personal matters that might arise unexpectedly, preventing the employee from working remotely. If an employee becomes ill while telecommuting and unable to perform their responsibilities to Company's expectations, the employee must notify their supervisor or manager immediately. PTO is provided for rest and relaxation to aid an employee's recovery from any illness or when feeling unwell. Telecommuting while ill or unwell may impact an employee's performance and productivity and PTO must be utilized under these circumstances just as an employee would do so if working onsite.

Employees on a Telecommuting Arrangement must also ensure they utilize PTO for planned events such as vacation and other personal matters. While SterlingRisk's PTO policy provides for a limited amount of PTO to be carried over into the following calendar year, any remaining PTO is forfeited and not paid. It is important that employees on a Telecommuting Arrangement recognize this and utilize their PTO in accordance with SterlingRisk's policy just as an employee would do so if working onsite.

An employee on a Telecommuting Arrangement who takes PTO in accordance with SterlingRisk's Employee Handbook must include an "out of office" automated message on their email and voice mail. The "out of office" message must detail a backup contact person, the backup contact person's email and phone number, and the duration of time the employee will be out of the office.

Injuries While Telecommuting

All employees who telecommute shall maintain a safe and secure work environment and will protect the workspace from any hazards and dangers that could foreseeably affect the equipment, themselves, and others. Consistent with SterlingRisk's policy on Workers' Compensation, SterlingRisk shall provide employees who telecommute with workers' compensation coverage as required by state law. All employees on a Telecommuting Arrangement agree to report work-related injuries to their supervisors and Human Resources within 24 hours or at the earliest reasonable opportunity. Please contact the Associate General Counsel with a copy to Human Resources concerning Workers' Compensation coverage.