



Employee Handbook Supplement: Connecticut

Connecticut Supplement

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General Information

About This Connecticut Supplement

SterlingRisk is committed to workplace policies and practices that comply with federal, state and local laws. For this reason, Connecticut employees will receive the Company's Employee handbook and the Connecticut Supplement to the Employee Handbook.

The Connecticut Supplement, however, applies only to Connecticut employees. It should be read together with the Employee Handbook and, to the extent that the policies in the Connecticut Supplement, or what is required under Connecticut or local law are different from, or more generous than those in the Employee Handbook, the policies in the Connecticut Supplement or required under applicable law will apply.

The Connecticut Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship. Only the Chief Executive Officer has the authority to enter into an agreement that alters the at-will employment relationship, and any such agreement must be in writing and signed by the Chief Executive Officer.

If employees have any questions about these policies, they should contact the Human Resources Department.

Commitment to Diversity

Equal Employment Opportunity

As set forth in the Employee Handbook, SterlingRisk is committed to equal employment opportunity. We comply with Connecticut law, which prohibits discrimination and harassment against any employee, intern or applicant for employment based on race (including traits historically associated with race, such as hair texture and protective hairstyles (e.g., wigs, headwraps, braids, cornrows, locs, twists, Bantu knots, afros and afro puffs)), color, religion, creed, age, sex (including pregnancy, child-bearing capacity, sterilization, fertility or related medical conditions), sexual orientation, national origin, homelessness, family violence victim status, ancestry, marital status, veteran status, gender identity or expression, and present or past history of mental, intellectual, physical or learning disability and genetic information. The Company will not tolerate discrimination or harassment based on these characteristics or any other characteristic protected by applicable federal, state or local law.

The Company also complies with the Connecticut law prohibiting sexual harassment of interns and individuals seeking an internship.

Sexual and Other Unlawful Harassment

SterlingRisk is committed to providing a work environment free of harassment. The Company complies with Connecticut law and maintains a strict policy prohibiting sexual harassment and unlawful discrimination against any employee, intern or applicant for employment based on race, color, religion, creed, age, sex (including pregnancy, child-bearing capacity, sterilization, fertility or related medical conditions), sexual orientation, national origin, homelessness, family violence victim status, ancestry, marital status, veteran status, gender identity or expression, and present or past history of mental, intellectual, physical or learning disability, and genetic information. The Company will not tolerate discrimination or harassment based upon these characteristics or any other characteristic protected by applicable federal, state or local law. The Company strictly prohibits sexual harassment by or against any individuals involved in Company operations, including employees

(regardless of position), applicants, interns, temporary workers, vendors, contractors and any other third party involved in Company operations.

All employees are expected to comply with the Company's Sexual and Other Unlawful Harassment policy which is included in the Employee Handbook. While the Sexual and Other Unlawful Harassment policy sets forth the Company's goals of promoting a workplace that is free of harassment, the policy is not designed or intended to limit the Company's authority to discipline or take remedial action for workplace conduct that we deem unacceptable, regardless of whether that conduct satisfies the definition of unlawful harassment.

Any employee who is found to have engaged in discriminatory or harassing conduct will be subject to appropriate disciplinary action, up to and including termination. Individuals who engage in acts of sexual harassment may also be subject to civil and criminal penalties.

Retaliation against anyone reporting acts of harassment or discrimination, participating in an investigation, or helping others exercise their right to complain about discrimination or harassment is unlawful and will not be tolerated.

In addition to the complaint procedures set forth in the Employee Handbook, any employee who believes they have been harassed or discriminated against may file a complaint with the Connecticut Commission on Human Rights and Opportunities (CHRO). The CHRO may be reached at 450 Columbus Blvd Suite 2, Hartford CT 06103; telephone number (860) 541-3400; TDD number (860) 541-3459; and Connecticut Toll Free 1(800) 477-5737.

Connecticut law requires that a complaint be filed with the CHRO within 180 days of the date when the alleged harassment occurred, if it occurred prior to October 1, 2019, and within 300 days of the alleged harassment, if it occurred on or after October 1, 2019. Remedies for sexual harassment can include:

- Cease and desist orders;
- Back pay;
- Compensatory damages;
- Emotional distress damages; and
- Hiring, promotion or reinstatement.

Employees can find additional information about the illegality of sexual harassment and the remedies available to victims of sexual harassment at the CHRO's informational website: <https://portal.ct.gov/CHRO/Sexual-Harassment-Prevention-Training/Pages/Sexual-Harassment-Prevention-Resources>

General Employment Practices

Access to Personnel Files and Medical Records

Personnel Files

Access to the information contained in employee personnel files and medical records is restricted. Only authorized personnel will have access to an employee's personnel file or medical records. The Company will divulge or permit review of employees' personnel files or medical records to third parties only as permitted or required by law.

Employees in Connecticut can access their own personnel file up to two times each calendar year. An employee's request to access their personnel file must be in writing, addressed to the Human Resources Department. Current employees will be permitted to inspect, and if requested, copy their personnel files within seven business days after the Company receives their written request. Such inspection will take place during regular business hours at a location at, or reasonably near, the employee's place of employment. Employees who request and receive a copy or partial copy of their personnel file may be charged a fee reasonably related to the cost of supplying those documents.

Former employees who worked for the Company in Connecticut will be permitted to inspect, and if requested, copy their personnel files within 10 business days after the Company receives their written request, provided that the former employee's written request is received no later than one year after the termination of their employment. Such inspection will take place during regular business hours at a location mutually agreed upon by the Company and the former employee, or the former employee will be mailed a copy of their personnel file.

Personnel file documents do not include stock option or management bonus plan records, medical records, letters of reference or recommendations from third parties including former employers, materials that are used by the Company to plan for future operations, information contained in separately maintained security files, test information, the disclosure of which would invalidate the test, or documents which are being developed or prepared for use in civil, criminal or grievance procedures.

If an employee disagrees with any of the information contained in their personnel file or medical records, the employee may request that the Company remove or correct such information. If the employee and the Company cannot agree upon such removal or correction, the employee may submit a written statement explaining their position. The employee's written statement will be maintained as part of their personnel file or medical records and will accompany any transmittal or disclosure from such file or records made to a third party.

Employees will be provided any documentation of any disciplinary action imposed on them within one business day after the date of imposing such action. An employee immediately will be provided with a copy of any documented notice of their termination of employment. If an employee disagrees with any of the information contained in a documented disciplinary action, notice of termination or performance evaluation, they may submit a written statement explaining their position. The employee's written statement will be maintained as part of their personnel file and will accompany any transmittal or disclosure from such file or records made to a third party.

Medical Records

Any medical records submitted to the Company with respect to a Connecticut employee will be kept separate and apart from the employee's personnel file. An employee may submit a written request to the Human Resources Department for an inspection of any medical records that may be in the Company's possession regarding the employee. The Company will allow such inspection within a reasonable time after it receives the employee's written request. The inspection will take place during regular business hours at a location at or reasonably near the employee's place of employment and will be made by a physician chosen by the employee or a physician chosen by the employer with the employee's consent.

Time Off and Leaves of Absence

Family and Medical Leave

SterlingRisk recognizes that employees may need to be absent from work for an extended period of time for family and/or medical reasons and will grant time off to employees in accordance with the requirements of the

federal Family and Medical Leave Act (FMLA) and the Connecticut Family and Medical Leave Act (CTFMLA). When both the FMLA and CTFMLA apply, the leave provided by each will count against the employee's entitlement under both laws and must be taken concurrently. An employee who is eligible for leave under only one of these laws will receive benefits in accordance with that law only.

The following policy addresses employee rights under the CTFMLA. Employees should refer to the Company's FMLA policy for additional details regarding the FMLA. All questions concerning this policy should be directed to the Human Resources Department.

Employee Eligibility

To be eligible for leave under the CTFMLA, employees must have been employed by the Company in the state of Connecticut for at least three consecutive months (i.e., 13 weeks) immediately preceding the request for leave.

Reasons for and Length of Family and Medical Leave

Eligible employees may request up to a maximum of 12 weeks of CTFMLA leave in a 12-month period for one or more of the following reasons:

- To bond with a child within one year of the child's birth or placement in connection with foster care or adoption, or when leave is required because of the impending birth or placement of a child ("Bonding Leave").
- To care for a family member who has a serious health condition ("Family Care Leave").
- For the employee's own serious health condition ("Serious Health Condition Leave").
- To serve as an organ or bone marrow donor ("Donor Leave").
- For a "qualifying exigency," as defined under the FMLA, arising from a spouse's, child's or parent's "covered active duty" (as defined below) as a member of the military reserves, National Guard (including the Connecticut National Guard) or armed forces ("Military Emergency Leave").

For the 12-month period, the Company uses the calendar year; measured forward from the start date of the employee's first CTFMLA leave. Under this method, the 12-month period is measured from the date the employee first uses any CTFMLA leave]; using the calendar year method: the 12-month period begins each January, and ends each December

Serious Health Condition Leave may be extended up to an additional two weeks (up to a total of 14 weeks of Serious Health Condition Leave in a 12-month period) if the employee experiences a serious health condition that results in incapacity during pregnancy.

Eligible employees may also take CTFMLA leave when they are absent from work to care for a spouse, child, parent or next of kin, who is a member of the armed forces (as defined under the law) and is undergoing medical treatment, recuperation, or therapy, is otherwise in an outpatient status or is on the temporary disability retired list for a serious injury or illness incurred in the line of duty ("Military Caregiver Leave").

Employees seeking Military Caregiver Leave may take up to a maximum of 26 workweeks in a single 12-month period for each armed forces member, per serious injury or illness incurred in the line of duty. The 12-month period begins on the date of the employee's first day of leave taken to care for a covered armed forces member and ends 12 months after that first day of leave.

If both spouses are employed by the Company and are eligible for CTFMLA leave, their combined leave may not exceed a combined total of 12 workweeks during any 12-month period if such leave is taken upon the birth or

placement for adoption or foster care of a child or to care for a sick family member. If both spouses are employed by the Company and are entitled to Military Caregiver Leave, the aggregate number of workweeks of leave to which both are entitled may be limited to 26 workweeks during any 12-month period.

Intermittent and Reduced Schedule Leave

Serious Health Condition Leave, Military Caregiver Leave, Donor Leave and Family Care Leave may be taken intermittently (i.e., in separate blocks of time) or on a reduced schedule (i.e., a schedule that reduces the usual number of hours per workweek, or hours per workday) when medically necessary. Leave due to military exigencies may also be taken on an intermittent basis. The Company may require an employee to temporarily transfer during a period of intermittent or reduced schedule leave to an available alternative position for which the employee is qualified and which better accommodates the recurring periods of leave than does the employee's regular position.

Definitions

- **"Covered active duty"** means (1) in the case of a member of a regular component of the armed forces, duty during the deployment of the member with the armed forces to a foreign country; and (2) in the case of a member of a reserve component of the armed forces, duty during the deployment of the member with the armed forces to a foreign country under a call or order to active duty (or notification of an impending call or order to active duty) in support of a contingency operation as defined by applicable law.
- **"Family member"** means an employee's spouse, sibling, child, grandparent, grandchild or parent, or an individual related to the employee by blood or affinity whose close association the employee shows to be the equivalent of those family relationships, regardless of biological or legal relationship or lack thereof.
- **"Grandchild"** means a grandchild related to a person by blood or marriage or because of the adoption of a minor child or foster care of a child by a child of the grandparent.
- **"Grandparent"** means a grandparent related to a person by blood or marriage or because of the adoption of a minor child or foster care of a child by a child of the grandparent.
- **"Next of kin"** means, with respect to Military Caregiver Leave, the armed forces member's nearest blood relative, other than their spouse (including a same-sex spouse or out-of-state civil union or domestic partner), parent, child, in the following order of priority: blood relatives who have been granted legal custody of the armed forces member by court decree or statutory provisions, siblings, grandparents, aunts and uncles, and first cousins, unless the covered armed forces member has specifically designated in writing another blood relative as their nearest blood relative for purposes of Military Caregiver Leave or any other individual whose close association with the employee is the equivalent of a family member for purposes of Military Caregiver Leave, in which case the designated individual will be considered the next of kin.
- **"Parent"** means a biological parent, foster parent, adoptive parent, stepparent, parent-in-law or legal guardian of an eligible employee or an eligible employee's spouse, an individual standing to an eligible employee, or an individual who stood in loco parentis to the eligible employee when the employee was a child.
- **"Serious Health Condition"** means an illness, injury, impairment or physical or mental condition that involves either: inpatient care in a hospital, hospice, nursing home or residential medical care facility; or continuing treatment, including outpatient treatment, by a health care provider.
- **"Sibling"** means the biological brother, biological sister, half-brother, half-sister, stepbrother, stepsister, adopted brother, adopted sister, foster brother, foster sister, brother-in-law or sister-in-law of the eligible employee or the eligible employee's spouse.
- **"Son or daughter"** means a biological, adopted or foster child, stepchild, legal ward, or a child of a person standing in loco parentis, or an individual to whom the employee stood in loco parentis when the individual was a child.

- **"Spouse"** means a person to whom one is legally married.

Requesting Leave

Employees should contact the Human Resources Department as soon as they become aware of the need for CTFMLA leave. Only the Human Resources Department has the authority to grant or deny requests for CTFMLA leave.

If the need for Bonding Leave is foreseeable, the employee must provide at least 30 days' advance notice of the intention to take leave. If the date of birth or placement of a child requires leave to begin in less than 30 days, the employee must provide notice as soon as is practicable. If the need for Serious Health Condition Leave, Family Care Leave or Donor Leave is foreseeable based on planned medical treatment, the employee should make a reasonable effort to schedule the treatment so as not to unduly disrupt Company operations (subject to health care provider approval) and must provide 30 days' advance notice, or as much notice as is practicable.

Any request for Serious Health Condition Leave, Family Care Leave or for Military Caregiver Leave must be supported by a certification issued by the health care provider of the eligible employee or family member. Certification forms for this purpose may be obtained from the Human Resources Department. Employees must provide a copy of the completed certification form to the Human Resources Department in no less than 15 calendar days of the Company's request. Certifications for intermittent leave or leave on a reduced schedule for certain qualifying reasons will need to include the expected duration and schedule of the intermittent leave or reduced schedule leave.

If a completed form is not returned in a timely manner, the leave may be delayed or denied. The Company may require periodic recertification, not more than once per 30-day period unless required by the health care provider. The Company may also require, at its own expense, a second or third medical opinion regarding an employee's own serious health condition or the serious health condition of an employee's family member. Employees are expected to cooperate with the Company in obtaining additional medical opinions that the Company may require.

Health Benefits

The Company will not continue making contributions for an employee's group health benefits during a CTFMLA leave unless the employee is eligible for benefit continuation under another applicable law, such as the federal FMLA. Employees will be provided information regarding continuation of benefits under COBRA, where applicable.

No loss of service credit with the Company will occur as a result of leave under the FMLA or the CTFMLA, but an employee who takes leave under this policy is not entitled to the accrual of any seniority or employment benefits during any period of leave.

Effect on Other Rights and Paid Leave

When both the FMLA and the CTFMLA apply, the leave provided by each will count against the employee's entitlement under both laws, and leave taken under the FMLA will run concurrently with leave taken under the CTFMLA.

For time off that qualifies as CTFMLA leave, employees may use available vacation and other available paid time off concurrently with unpaid CTFMLA leave. Employees will also be allowed to use up to two weeks of available accrued sick leave for Bonding Leave or Family Care Leave.

Employees may also be eligible to receive partial wage replacement benefits (PFML benefits) during a CTFMLA leave through the state-mandated Connecticut Paid Leave Program, which is administered by the CT Paid Leave Authority (PLA). Sick leave, vacation and similar Company-provided paid time off cannot be used simultaneously with PFML benefits.

For more information about PFML benefits, see the Company's Paid Family and Medical Leave Benefits policy or contact Human Resources. Employees can also find additional information about filing for PFML benefits through the PLA's website: ctpaidleave.org.

Return From Leave

Upon return from leave, the employee will be returned to work at the position of employment held by the employee when the leave commenced or, if that position is not available, to one with equivalent benefits, pay and other terms and conditions of employment. If an employee is medically unable to perform the functions of their original job upon expiration of the leave, they will be transferred to work that is suitable for the employee's physical condition if such work is available. An employee has no greater right to continued employment or reinstatement than if the employee had been continuously employed. For example, employment may be terminated in conjunction with a layoff or job elimination during a leave of absence the same as if the employee were not on leave.

We require each employee returning from a leave taken for their own serious health condition to receive certification from a health care provider that the employee can resume work unless the employee is on an intermittent or reduced schedule.

Confidentiality

Documents relating to medical certifications, recertifications or medical histories of employees or employees' family members will be maintained separately and treated as confidential medical records, except that in some legally recognized circumstances, the records (or information in them) may be disclosed to supervisors and managers, first aid and safety personnel or government officials.

Fraudulent Use of CTFMLA Prohibited

An employee who fraudulently obtains CTFMLA leave from the Company is not protected by the CTFMLA's job restoration or maintenance of health benefits provisions. In addition, the Company will take all available appropriate disciplinary action against an employee who engages in this kind of fraud.

Protected Rights

The Company takes its CTFMLA obligations very seriously and will not interfere with, restrain or deny the exercise of any right protected under the CTFMLA. It is a violation of Connecticut law and Company policy to retaliate against an employee because they request, apply for or use CTFMLA leave for which they are eligible. Employees who believe that their CTFMLA rights have been violated in any way should immediately report the matter to the Human Resources Department. Employees also have the right to file a complaint with the Connecticut Labor Commissioner alleging a violation of the CTFMLA.

Paid Family and Medical Leave Benefits

In accordance with the Connecticut Paid Family and Medical Leave Act (PFMLA) employees may be eligible through the state-mandated Connecticut paid leave program to receive partial wage replacement benefits (PFML

benefits) for leave taken for any of the qualifying reasons under the Connecticut Family and Medical Leave Act (CTFMLA) or to address specific situations associated with being the victim of family violence or sexual assault. PFML benefits are administered and paid by the CT Paid Leave Authority (PLA), not the Company.

Employee Eligibility

To be eligible for PFML benefits, an employee must have earned at least \$2,325.00 during the base period (i.e., the first four of the five most recently worked quarters) and must either be currently employed by an employer covered by PFMLA or have been employed by a covered employer within the previous 12 weeks. The PLA will determine whether the employee has met eligibility requirements for purposes of PFML benefits.

Reasons For and Length of PFML Benefits

Eligible employees can receive up to 12 weeks of PFML benefits in a 12-month period when not working because of a reason that is also a protected reason for leave under CTFMLA (i.e., to bond with a new child, care for a family member with a serious health condition, care for the employee's own serious health condition, serve as an organ or bone marrow donor, care for certain family members who were injured in the line of duty while on active military duty, or assist with obligations that arise when a family member is called into active military service). Employees may also be entitled to an additional two weeks of PFML benefits (up to a total of 14 weeks) if they experience a pregnancy-related serious health condition that results in incapacity.

If both spouses are employed by the Company and are eligible for PFML benefits, they will each be eligible for up to 12 weeks of compensation in a 12-month period. This eligibility for PFML benefits does not increase an employee's eligibility for protected leave under the CTFMLA.

Employees may also be eligible to receive PFML benefits during leave provided in accordance with Connecticut law for reasons related to being the victim of family violence or sexual assault, including to: seek medical care or counseling for physical or psychological injury or disability; obtain services from a victim services organization; relocate due to the family violence or sexual assault; or participate in any civil or criminal proceeding related to or resulting from such family violence or sexual assault.

Employees can seek PFML benefits when taking nonconsecutive hours of leave (i.e., leave on an intermittent or reduced schedule basis).

The PFMLA does not provide eligible employees with job protection beyond that which the employee is entitled under the CTFMLA, the law protecting employees who are victims of family violence or other applicable state or federal law. Employees should consult the Company's Connecticut Family and Medical Leave and Family Violence and Sexual Assault Victim Leave policies or contact the Human Resources Department for additional information about available leave.

For purposes of this policy, a "serious health condition" means an illness, injury, impairment or physical or mental condition that involves either: inpatient care in a hospital, hospice, nursing home or residential medical care facility; or continuing treatment, including outpatient treatment, by a health care provider.

"Family member" means a spouse, sibling, daughter or son, grandparent, grandchild or parent, or an individual related to the employee by blood or affinity, and whose close association the employee shows to be the equivalent of those family relationships.

Wage Replacement Benefits

Eligible employees can seek wage replacement benefits through the PFML benefits program. The PFML wage replacement benefits are calculated by the PLA, not the Company, in accordance with the following:

Eligible Employee's Base Weekly Earnings	Eligible Employee's PFML Benefit Rate
Base weekly earnings are less than or equal to the Connecticut minimum wage multiplied by 40	95% of the eligible employee's base weekly earnings, less any offsets
Base weekly earnings are greater than the Connecticut minimum wage multiplied by 40	95% of the Connecticut minimum wage multiplied by 40, plus 60% of the amount the employee's base weekly earnings exceed the Connecticut minimum wage multiplied by 40 (less any offsets), up to maximum weekly benefit amount of 60 times the Connecticut minimum wage.

Benefit payments will be administered by the PLA. Approved benefits are generally paid on a weekly basis by Electronic Funds Transfer or Stored Value Card. Paper checks will not be issued. There is no waiting period to receive the benefits once approved.

Employees will not be eligible to receive PFML benefits concurrently with income replacement compensation from unemployment insurance, workers' compensation or any other wage replacement benefit provided in accordance with a state or federal program, except for compensation provided as part of the Office of Victim Services' victim compensation program (provided that the total amount received does not exceed the employee's regular rate of compensation).

Payroll Deductions

PFML benefits are funded by employee contributions to the Connecticut Paid Leave Trust Fund. Employee contributions are made through after-tax payroll deductions, and the amount of the contribution will not exceed one-half of one percent (0.5%) of the employee's base weekly earnings (as calculated for purposes of FICA), up to the Social Security wage contribution cap set by the federal government. The amount of any deduction taken will be reflected on an employee's paystub.

Requesting Benefits

Employees seeking to use PFML benefits must provide notice to the Company and to the PLA. Employees will need to submit a claim for benefits and supporting documentation to the PLA. The PLA has indicated that it will not typically approve requests for PFML benefits that are submitted more than 45 days following the initial date for which compensation is requested, unless the PLA determines that the employee has good cause for the delay.

Among other things, the PLA requires that employees provide an Employment Verification Form (EVF) to their employers. Employees seeking PFML benefits can submit the EVF to Human Resources by email. The Company will submit the completed EVF to the PLA within 10 calendar days after receiving the EVF from the employee.

Employees can find additional information about filing for PFML benefits through the PLA's website: www.ctpaidleave.org.

Effect on Other Paid Leave

Employees may use available sick leave, vacation or similar Company-provided paid time off before using PFML benefits while on leave, although employees who are on a protected CTFMLA leave will be allowed to retain two weeks of such paid time off. Employees will also be allowed to use up to two weeks of available accrued sick leave before using PFML benefits for CTFMLA leave that is taken for the purposes of Bonding or Family Care, as those terms are defined in the Company's Connecticut Family and Medical Leave Policy.

Sick leave, vacation and similar Company-provided paid time off cannot be used simultaneously with PFML benefits.

Protected Rights

The Company takes its CTFMLA obligations, family violence victim leave obligations and employee rights under the PFMLA very seriously and will not interfere with, restrain or deny the exercise of any right protected under the CTFMLA or PFMLA. It is a violation of Connecticut law and Company policy to retaliate against an employee because they request, apply for or use CTFMLA leave for which they are eligible. Employees who believe that their CTFMLA or PFMLA rights have been violated in any way should immediately report the matter to the Chief Human Resources Officer. Employees also have the right to file a complaint with the Connecticut Labor Commissioner alleging a violation of the CTFMLA.

Employees may also contact the Human Resources Department with questions regarding CTFMLA leave, leave for victims of family violence or sexual assault or PFML Benefits.

Paid Sick Leave (Lump Sum Method)

The Company provides eligible employees with sick leave pursuant to Connecticut's Paid Sick Leave Law (PSLL).

Eligibility

All non-seasonal employees who work in Connecticut for the Company are eligible to receive sick leave under this policy.

Annual Grant of Leave

The Company provides an annual grant of 40 hours of sick leave to employees on their first calendar day of employment with the Company or on their date of eligibility under the PSLL, whichever is later, and at the beginning of each benefit year thereafter.

Sick leave that remains unused at the end of a calendar year will be lost and will not carry over from one year to the next.

Employees will be able to determine the amount of sick leave available for use by reviewing their sick time balances in ADP.

Using Leave

Newly hired employees cannot use their sick time until their 90th day of employment with the Company. After that, employees may use sick leave as it is granted.

Employees may use a maximum of 40 hours of sick leave per benefit year.

Employees must use sick leave in one-hour increments, to cover all or part of a workday.

Employees are not required to search for or find a replacement worker to cover the period during which they use sick leave.

Covered Reasons for Use

Sick leave may be used only during times that an employee cannot work for the following reasons:

- The employee's mental or physical illness, injury or health condition; need to seek medical diagnosis, care or treatment for the illness, injury or health condition; need for preventative medical care; or mental health wellness day (to attend to the employee's emotional and psychological well-being in lieu of attending a regularly scheduled shift).
- A family member's mental or physical illness, injury or health condition; need to seek medical diagnosis, care or treatment for the illness, injury or health condition; or need for preventative medical care.
- Closure of the Company's place of business by order of a public official due to a public health emergency.
- Closure of a family member's school or place of care by order of a public official due to a public health emergency.
- For a determination by a health authority having jurisdiction, the Company, an employer of a family member or a health care provider, that such employee or family member poses a risk to the health of others due to such employee's or family member's exposure to a communicable illness, whether or not the employee or family member contracted the communicable illness.
- Absences due to family violence or sexual assault of an employee or the employee's child or the employee's family member in order to:
 - Obtain medical care or psychological or other counseling for physical or psychological injury or disability;
 - Obtain services from a victim services organization;
 - Relocate due to such family violence or sexual assault; or
 - Participate in any civil or criminal proceedings related to or resulting from such family violence or sexual assault.

For purposes of this policy, "family member" means the employee's:

- Spouse;
- Registered domestic partner;
- Child (including a biological, adopted or foster child, stepchild, legal ward, a child of an employee standing *in loco parentis*, or an individual to whom the employee stood *in loco parentis* when the individual was a child);
- Parent (including a biological, foster or adoptive parent, stepparent, parent-in-law, legal guardian of an employee or an employee's spouse, an individual standing *in loco parentis* to an employee, or an individual who stood *in loco parentis* to the employee when the employee was a child);
- Sibling (including by blood, marriage, adoption, or foster care placement); grandchild (by blood, marriage, adoption or foster care);

- Grandparent; or
- An individual related to the employee by blood or affinity whose close association with the employee is equivalent to a family relationship.

Notice Required

If the need to use sick leave is foreseeable, such as for prescheduled medical appointments and court dates in family violence cases, employees should provide reasonable advance notice of an absence from work to the Human Resources Department. If the need to use sick leave is unforeseeable, employees should provide notice as soon as practicable to their direct manager and Human Resources Department. Employees may provide notice by contacting their manager or Human Resources department via phone, email or text.

When notifying the Company of the need to use sick leave, an employee should include the anticipated duration of the absence, when possible.

In all circumstances, employees are responsible for specifying that the time off is for sick leave reasons (as opposed to, for example, vacation), so that the absence may be designated as a sick leave absence.

According to the Company's timekeeping policies, employees should record their use of sick leave in ADP, either before their absence or upon their return to work.

Verification of Absence

In general, the Company will not require documentation or certification as proof or in support of sick leave unless permitted under another applicable law including, but not limited to, the federal Family and Medical Leave Act (FMLA) or the Americans with Disabilities Act (ADA).

Discipline for Unprotected Use of Leave

Discipline, up to and including termination, may be taken against an employee who:

- Uses sick leave for a purpose not covered by, or in a manner not consistent with, the PSLL; or
- Violates this policy's requirements concerning requesting, using, and/or recording use of sick leave.

Rate of Pay

The rate of pay for sick leave will be calculated in accordance with applicable law.

Separation From Employment

The Company does not pay employees for unused sick leave at any time, including upon separation from employment for any reason.

No Discrimination or Retaliation

As long as the use of sick leave complies with the requirements of this policy and the PSLL, the Company will not count employees' use of sick leave as an absence or "occurrence" under any Company attendance policy. Therefore, any such use of sick leave will not lead to or result in discipline, demotion, suspension or termination.

The Company will not retaliate or discriminate against any employee for requesting or using sick leave for authorized circumstances; making a complaint or informing a person about a suspected violation of this policy; cooperating or participating in any investigation, administrative hearing or judicial action regarding an alleged violation; opposing any policy or practice prohibited by any sick and safe time or mandatory paid leave law; or informing any person of their potential rights under the law.

Additional Information

Employees who have questions about this policy should contact the Human Resources Department.

Pregnancy Leave and Accommodation

The Company will grant a reasonable leave of absence to female employees who are disabled due to pregnancy in accordance with all applicable laws. If the need for leave is unforeseeable, employees should notify the Company as soon as possible and practical. When the need for the leave is foreseeable, the employee must provide 30 days' advance notice, or such notice as is both possible and practical if the leave must begin in less than 30 days (normally this would be the same day the employee becomes aware of the need for leave or the next business day). Any request for pregnancy-related leave must be supported by a certification issued by the employee's health care provider. Certification forms for this purpose may be obtained from Human Resources. Employees must provide a copy of the completed certification form to Human Resources within 15 calendar days, unless a longer period of time is reasonably necessary.

If an employee is eligible for leave under the federal Family and Medical Leave Act (FMLA) or the Connecticut Family and Medical Leave Act (CFMLA), the FMLA and/or CFMLA leave and pregnancy disability leave will run concurrently. Once the employee signifies an intent to return to work, the employee will be reinstated to her original or similar position with equivalent pay and benefits unless the Company's circumstances have changed and make it impossible or unreasonable to do so.

The Company will not deny employment opportunities or take adverse employment action against otherwise qualified applicants or employees based on the need to make such reasonable accommodations, nor will the Company retaliate against any employee or applicant who requests an accommodation.

Employees who have questions about this policy or who wish to request leave or other reasonable accommodation under this policy should contact their Human Resources representative. Human Resources will communicate with the employee and engage in good faith in an interactive process to determine the nature of the limitation and what, if any, reasonable accommodation(s) may be appropriate. In some cases, this interactive process may be triggered without a request from the employee, such as when the Company receives notice from its own observation or another source that an employee may need a reasonable accommodation related to pregnancy, childbirth or related conditions.

Crime Victim Leave

Employees may take time off from work, without pay, for the following reasons:

- To comply with a legal subpoena to appear before any court of Connecticut as a witness in a criminal proceeding.
- To attend a court proceeding or to participate in a police investigation related to a criminal case in which the employee is a crime victim (i.e., has suffered direct or threatened physical, emotional or financial harm as a result of the crime) or is an immediate family member or guardian of: (1) a homicide victim; or (2) a

person who has suffered direct or threatened physical, emotional or financial harm as a result of a crime and is a minor, physically disabled or incompetent.

Employees should provide the Company as much advance notice of the need for leave under this policy as is possible. If advance notice is not feasible, the employee must provide appropriate documentation within a reasonable period of time after the absence.

The Company will not retaliate, or tolerate retaliation, against any employee who seeks or obtains leave under this policy.

Domestic Violence Victim Leave

Employees who are victims of domestic violence are allowed a reasonable leave of absence to:

- Seek attention for injuries caused by domestic violence, including for a child who is a victim of domestic violence, provided the employee is not the perpetrator of the domestic violence against the child;
- Obtain services, including safety planning from a domestic violence agency or rape crisis center, as a result of domestic violence;
- Obtain psychological counseling related to an incident or incidents of domestic violence, including for a child who is a victim of domestic violence, provided the employee is not the perpetrator of the domestic violence against the child;
- Take other actions to increase safety from future incidents of domestic violence, including temporary or permanent relocation; or
- Obtain legal services, assist in the prosecution of the offense or otherwise participate in legal proceedings in relation to the incident or incidents of domestic violence.

The Company may require certification of the employee's reason for leave to be submitted within a reasonable time after the absence. Certification can include any of the following:

- A police report indicating that the employee or the employee's child was a victim of domestic violence;
- A court order protecting or separating the employee or the employee's child from the perpetrator of an act of domestic violence;
- Other evidence from the court or prosecuting attorney that the employee appeared in court; or
- Documentation from a medical professional, domestic violence counselor or other health care provider that the employee or the employee's child was receiving services, counseling or treatment for physical or mental injuries or abuse resulting from an act of domestic violence.

To the extent permitted by law, the Company will maintain the confidentiality of any information regarding an employee's status as a victim of domestic violence.

Employees may also be entitled to leave for issues related to domestic violence under certain federal or state laws. In certain situations, leave under this policy may run at the same time as leave available under another federal, state or local law, provided eligibility requirements for that law are met.

The Company will not discriminate or retaliate against an employee because they are a victim of domestic violence or request leave in accordance with this policy. An employee who has a physical or mental disability resulting from an incident or series of incidents of domestic violence will be treated in the same manner as an employee with any other disability.

Family Violence and Sexual Assault Victim Leave

Employees may take a leave of absence of up to 12 days during any calendar year in which the leave is reasonably necessary for the following reasons relating to family violence or sexual assault:

- To seek medical care or counseling for physical or psychological injury or disability.
- To obtain services from a victim services organization;
- To relocate due to the family violence or sexual assault; or
- To participate in any civil or criminal proceeding related to or resulting from such family violence or sexual assault.

For purposes of this policy, family violence includes incidents between family or household members that result in physical harm, bodily injury or assault; acts of threatened violence that result in a fear of imminent physical harm, bodily injury or assault, including, but not limited to, stalking or a pattern of threatening; or verbal abuse accompanied by a present danger and likelihood that physical violence will result.

Employees must provide seven days' notice when the need to use leave is foreseeable and notice as soon as practicable when it is not. The Company may require that employees submit a signed written statement certifying that the leave is due to family violence or sexual assault, as well as other types of verifying documentation.

Confidentiality of the situation will be maintained to the extent possible.

Paid Leave Benefits

Leave for victims of family violence or sexual assault is generally unpaid by the Company. However, employees may elect to use available paid leave. In addition, employees may be eligible to receive partial wage replacement benefits (PFML Benefits) through the state-mandated Connecticut Paid Leave Program. PFML Benefit payments are calculated and administered by the CT Paid Leave Authority (PLA).

For more information about PFML Benefits, see the Company's Paid Family and Medical Leave Benefits policy or contact Human Resources Department. Employees can also find additional information about filing for PFML Benefits through the PLA's website: ctpaidleave.org.

Retaliation Prohibited

The Company will not retaliate or tolerate retaliation against an employee because they seek or obtain leave under this policy or PFML Benefits for family violence and sexual assault victim leave.

Legislative Leave

Employees may take a leave of absence to perform duties as a candidate, member-elect or member of the General Assembly. The Company will not terminate or otherwise discriminate against an employee who requests or obtains leave under this policy.

Employees will not lose seniority due to the leave and will be provided a choice of shifts to accommodate the leave.

Time off under this policy will be unpaid, except that exempt employees may receive compensation, as required by applicable law.

Municipal or State Office Leave

Employees who accept a full-time elective municipal or state office position will be granted an unpaid personal leave of absence for not more than two consecutive terms of office. Employees who accept part-time elective positions are not entitled to leave under this policy.

Employees seeking leave under this policy must give the Company written notice of their candidacy for a full-time municipal or state office within 30 days after nomination for that office.

Upon application for reinstatement following the term of office, the employee will be reinstated to their original position or to a similar position with equivalent pay and accumulated seniority, retirement, fringe benefits and any other service credits. The Company reserves the right to deny reinstatement if its circumstances have changed such that it is impossible or unreasonable to provide reinstatement.

Civil Air Patrol Leave

Employees who are members of the Civil Air Patrol (the civilian auxiliary of the United States Air Force) may be absent from work to do any of the following in their capacity as a Civil Air Patrol member: respond to an emergency declared by the Governor of Connecticut or President of the United States; respond to a request for assistance in an emergency, natural disaster or life-threatening event at the request of the United States Air Force or Coast Guard, the Department of Emergency Services and Public Protection, the state police or a local Connecticut police department; or participate in required emergency services training programs and exercises.

Time off under this policy will be without pay, except that exempt employees may be paid for partial day absences.

Employees must notify Human Resources of their status as a Civil Air Patrol member by their date of hire or the date on which they join the Civil Air Patrol, whichever date is latest.

Employees must provide as much notice as possible when taking leave in accordance with this policy and must provide written verification from the Civil Air Patrol of the purpose of the leave.

Military Leave

Connecticut employees who, as part of their service in the armed forces of Connecticut, the National Guard of any other state or any reserve component of the armed forces of the United States, are ordered to perform military duty, including meetings or drills during regular work hours, will be provided a leave of absence for such service.

Time off under this policy will be without pay, except that exempt employees will not incur any reduction in pay for a partial week absence due to military duty. Employees may choose to substitute accrued paid time off for unpaid leave under this policy. Employees should contact the Human Resources department **[or insert name/contact details for appropriate company representative or department]** concerning their rights and entitlements if they are, or are contemplating being, in the military service.

Pay Practices

Discussion of Wages

No employee is prohibited from inquiring about, discussing or disclosing their wages or the wages of another employee, if voluntarily disclosed by that employee. The Company will not terminate, discipline or otherwise discriminate against employees because they engage in such disclosures, discussions or inquiries.

Employees are not required to disclose their wages to anyone.

Safety and Security

Privacy Protection for Social Security Numbers

SterlingRisk (the “Company”) has established the following procedures to protect the confidentiality and security of Social Security numbers (SSNs) received by the Company. This policy applies to SSNs received for any employment-related purpose, including, but not limited to, pre-employment background screening; payroll, benefits, and human resources administration; and employment-related investigations.

Access to, and Use of, Information or Documents that Contain SSNs

Only authorized employees of the Company may access information and documents containing SSNs. Authorized employees may access information or documents containing SSNs only on a need-to-know basis and may use such information and documents only for the purpose for which access is permitted.

Disclosures of Information or Documents That Contain SSNs

The Company will disclose documents containing SSNs outside the Company only as permitted or required by law or court order. If the recipient of the document does not have a need to know the SSN, the SSN should be redacted before disclosure. If the recipient of the document does have a need to know the SSN, then the Company, whenever feasible, should obtain the recipient’s written agreement to provide adequate protections for the documents containing the SSN. SSNs may not be disclosed to a third-party without the prior approval of the Legal Department or of the Director of Human Resources.

Additional Safeguards for SSNs

SSNs and documents containing SSNs should receive the following additional protections:

- SSNs should not be publicly displayed, for example, by including them in electronic documents posted on internal web sites or in paper documents posted on employee bulletin boards;
- SSNs should not be printed on cards, such as insurance identification cards, that must be presented for an employee to obtain goods or services;
- SSNs generally should not be printed on paper documents that are mailed to an employee unless the document, by law, is required to include an SSN (such as a W-2 Form) or in certain other limited circumstances. Employees should consult with the Legal Department before including SSNs in a mailing;
- Employees authorized to access SSNs should take steps to prevent casual viewing of SSNs by unauthorized persons, such as activating a password-protected screen saver when leaving an assigned computer unattended;

- Employees authorized to access SSNs should not download SSNs or documents containing SSNs to any portable storage medium unless it is encrypted or remotely access files containing SSNs other than through an encrypted connection;
- SSNs should not be transmitted over the internet unless encrypted pursuant to the Company's Information Security Policy.

Enforcement

Any employee who becomes aware of or suspects a violation of this policy should inform the Chief Human Resources or General Counsel immediately. No employee may retaliate against an employee who reports a violation of this policy. Violation of this policy will result in disciplinary action, up to and including termination of employment.

Receipt & Acknowledgment of Connecticut State Addendum

As an employee of the Company, I acknowledge the following:

- I have received a copy of the Connecticut State Addendum. I understand that the Employee Handbook contains important guidelines and information about the organization's policies, work rules and my benefits, and that it does not necessarily represent all the policies and practices of the organization. I also understand that I have the responsibility to read and understand the information in the Handbook, and the Connecticut State Addendum, and to ask my supervisor or the Human Resources Department for clarification of any information I do not understand.
- I understand that this Handbook and the Connecticut State Addendum is not a contract of employment, express or implied, or a guarantee of specific treatment in specific situations. I understand that neither this Handbook nor any representation made by a management representative at the time of hire or subsequently is to be interpreted as a contract between the Company and its employees. I understand that the Employee Handbook and the Connecticut State Addendum supersedes all prior Handbooks, policies and understandings on the subjects contained in it.
- I understand that the organization has the right to change, modify, add to, substitute, or eliminate, interpret, and apply, in its sole judgment, the policies, rules and benefits described in this Handbook. I understand that the Company CEO is the only person who is authorized to make changes in the policies, rules and benefits described in this Handbook and that all such changes must be in writing to be valid. I understand that should the content be changed in any way; the organization may require an additional signed acknowledgment from me to indicate that I am aware of the changes. I also understand that the CEO is the only person who will ever have the authority to enter into an employment contract, and that all such contracts must be in writing and signed by both parties to be valid.
- I understand that my employment relationship with the organization is at-will, regardless of the length of my employment or the granting of benefits of any kind, which means that either the organization or I can terminate the relationship at any time, with or without reason or notice, unless otherwise stated in a written employment contract,
- By my signature below, I further understand, acknowledge, accept, and consent to all Company policies within this Employee Handbook and Connecticut State Addendum and those posting on the Company's intranet, STRIVE, including Workplace Monitoring, Anti-Sexual Harassment and Anti-Discrimination Policy, and I am aware that this Employee Handbook.

Employee's Signature: _____ Date: _____

Employee's Name: _____