



CONNECTICUT SUPPLEMENT
2023

ComplianceHR

Note: This Employee Handbook is not intended to apply to any particular employer or to provide legal advice or opinion. Such advice may only be given when related to specific handbooks and specific fact situations. In no circumstances should any employee handbook be adopted and issued to employees before the final draft has been approved by experienced labor counsel. These employee handbook templates generally include policies prompted by federal and state laws in the employee policy context, as well as leave of absence and scheduling policies intended to comply with local laws in major municipalities (i.e., those with 100,000 residents or more). The handbook templates do not include the following: social media policies; drug-testing policies; policies related to municipal laws other than those specified above; or policies specific to government contractors or certain industries. Generally, the templates do not address industry-specific requirements, except where indicated.

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GENERAL INFORMATION

About This Connecticut Supplement

Dahl Consulting (“The Company”) 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 national handbook (“National Handbook”) and the Connecticut Supplement to the National Handbook (“Connecticut Supplement”) together, the “Employee Handbook.”

The Connecticut Supplement applies only to Connecticut employees. It is intended as a resource containing specific provisions derived under Connecticut law that apply to the employee’s employment. It should be read together with the National Handbook and, to the extent that the policies in the Connecticut Supplement are different from, or more generous than those in the National Handbook, the policies in the Connecticut Supplement will apply.

The Connecticut Supplement is not intended to create a contract of continued employment or alter the at-will employment relationship. **Only the President/Owner of the Company or that person’s authorized representative has the authority to enter into an agreement that alters the at-will employment relationship and any such agreement must be in writing signed by the President/Owner of the Company or an authorized representative.**

If employees have any questions about these policies, they should contact their DAHL representative.

COMMITMENT TO DIVERSITY

Equal Employment Opportunity

As set forth in the Employee Handbook, the Company 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), 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, 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.

Sexual and Other Unlawful Harassment

SEXUAL HARASSMENT IS ILLEGAL. The Company 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 National 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 National 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; Connecticut Toll Free 1(800) 477-5737; or online at www.ct.gov/CHRO.

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;
- Attorney's fees; 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://www.ct.gov/chro/cwp/view.asp?a=5019&Q=609536&chroNav=|>

GENERAL EMPLOYMENT PRACTICES

Access to Personnel Files and Medical Records

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.

Personnel Files

Employees in Connecticut can access their own personnel file up to two times each calendar year. An employee's request to access his or her personnel file must be in writing, addressed to their DAHL representative. 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 his or her 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 his or her 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 his or her 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 his or her position. The employee's written statement will be maintained as part of his or her 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 his or her termination of employment. If an employee disagrees with any of the information contained in a documented disciplinary action, notice of termination or performance evaluation, he or she may submit a written statement explaining his or her position. The employee's written statement will be maintained as part of his or her 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 their DAHL representative 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.

PAY PRACTICES

Meal Breaks

Employees who work seven and one-half or more consecutive hours will be provided one 30-minute meal break. The meal break generally should be taken after the first two hours of work and before the last two hours of work.

An uninterrupted 30-minute meal break will be unpaid for nonexempt employees. All nonexempt employees must record their meal breaks.

Employees who are unable to take all of the meal breaks to which they are entitled in accordance with this policy, or who have been prevented or discouraged from taking a break to which he or she is entitled under this policy, should immediately notify their DAHL representative.

Lactation Accommodation

In accordance with Connecticut law, an employee can, at their discretion, express breast milk or breastfeed during their meal or break periods.

The Company will make reasonable efforts to provide employees with the use of a room or other location (other than a toilet stall) in close proximity to their work area to express milk or breastfeed. Unless it would impose an undue hardship on the Company, the room or other location for lactation accommodation will also be free from intrusion and shielded from the public while the employee is expressing breast milk, include or be situated near a refrigerator or employee-provided portable cold storage device to store breast milk and include access to an electrical outlet.

Employees should discuss with their DAHL representative the location to express their breast milk and for storage of expressed milk and to make any other arrangements under this policy.

The Company will not discriminate against, discipline or otherwise take adverse action against an employee because she has elected to exercise her rights with regard to breastfeeding and/or expression of breast milk.

Discussion of Wages

No employee is prohibited from inquiring about, discussing or disclosing his or her 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.

TIME OFF AND LEAVES OF ABSENCE

Connecticut Family and Medical Leave

The Company 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 National Handbook for additional details regarding the FMLA. All questions concerning this policy should be directed to their DAHL representative.

Eligible Employees

To be eligible for CTFMLA leave, an employee must have been employed by the Company for at least three months 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 son or daughter 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 a rolling 12-month period measured backward from the date an employee uses their CTFMLA leave. Under this method the 12-month period is measured backward from the day the employee uses any CTFMLA leave.

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 pregnancy-related serious health condition that results in incapacity.

Eligible employees may also take CTFMLA leave when they are absent from work in order to care for a spouse (including a same-sex spouse and an out-of-state civil union or domestic partner residing in Connecticut), son, daughter, 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 services member and ends 12 months after that first day of leave.

If both spouses (including same-sex spouses or out-of-state civil union or domestic partners) 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 of a son or daughter for adoption or foster care 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 may be 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 leave 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 leave schedule to an available alternative position for which the employee is qualified to better accommodate the recurring periods of planned medical treatment leave.

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, son or daughter, 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.
- **“Grandchild”** means a grandchild related to a person by blood or marriage or because of the adoption or foster care 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 the covered armed forces member's spouse (including a same-sex spouse or out-of-state civil union or domestic partner), parent, son or daughter, 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, brothers, and sisters, 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 in loco parentis 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 a brother or sister related to a person by blood, marriage, adoption by a parent of the person or foster care placement.
- **“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.

Requesting Leave

Employees should contact Human Resources [or insert name/contact details for appropriate company representative or department] as soon as they become aware of the need for CTFMLA leave. Only the [insert name of appropriate company representative or 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 their DAHL representative. Employees must provide a copy of the completed certification form to their DAHL representative within 15 calendar days. 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 continue making contributions for an Employee's group health benefits during a CTFMLA leave on the same terms and conditions as if the Employee had continued to work. This means that if an Employee wants group health benefits coverage to continue during a CTFMLA leave, the Employee must continue to make any premium payments that the Employee is currently making for the Employee and the Employee's dependents.

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, paid sick time and other available paid time off. 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 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 their DAHL representative. Employees can also find additional information about filing for PFML Benefits through the PLA's website: ctpaidleave.org.

Return from Leave

Upon return from CTFMLA 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 layoff or job elimination during a leave of absence the same as if the employee were not on leave.

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 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 CT FMLA rights have been violated in any way should immediately report the matter to their DAHL representative. Employees also have the right to file a complaint with the Connecticut Labor Commissioner alleging a violation of the CTFMLA.

Employees may also contact their DAHL representative with questions regarding CTFMLA leave.

Connecticut Paid Family and Medical Leave Benefits

In accordance with the Connecticut's 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. PFML Benefits are administered and paid by the CT Paid Leave Authority ("PLA"), not the Company.

Eligible Employees

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 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 (including same-sex spouses or out-of-state civil union or domestic partners) 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, 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 participate in any civil or criminal proceeding related to or resulting from such family violence.

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

Employees should consult the Company's Connecticut Family and Medical Leave and Family Violence Victim Leave policies or contact their DAHL representative for additional information about available leave.

Contributions for PFML Benefits

PFML benefits are funded by employee contributions to the CT 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 wages (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.

Wage Replacement Benefits

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 via Electronic Funds Transfer or Stored Value Card.

Employees will not be eligible to receive PFML Benefits concurrently with unemployment insurance, workers’ compensation or any other wage replacement benefits provided in accordance with a state or federal program.

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 their DAHL representative by email or mail. 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: 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. 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.

Vacation and similar Company-provided paid time off cannot be used simultaneously with PFML Benefits.

Protected Rights

The Company takes its CTFMLA 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 CT FMLA or PFMLA rights have been violated in any way should immediately report the matter to their DAHL representative. Employees also have the right to file a complaint with the Connecticut Labor Commissioner alleging a violation of the CTFMLA.

Employees may also contact their DAHL representative with questions regarding CTFMLA leave, leave for victims of family violence or PFML Benefits.

Pregnancy Leave and Accommodation

Employees and applicants with needs related to pregnancy, childbirth or related conditions (including, but not limited to lactation and fertility treatment), may request a reasonable accommodation to enable them to perform their job. The Company will provide a reasonable accommodation for needs related to pregnancy, childbirth or a related medical condition so long as the requested accommodation does not impose an undue hardship on the Company's business operations.

A reasonable accommodation may include, but is not limited to, the following:

- Being permitted to sit or eat while working;
- More frequent or longer breaks, including bathroom, water or rest breaks;
- Modified policies regarding food and drink while working;
- Periodic rest;

- Assistance with manual labor;
- Assistive equipment (e.g., a stool, chair or assistive lifting equipment);
- Job restructuring;
- Light or desk duty assignments;
- Modified work schedules;
- Modified dress code or uniform requirements;
- Relocation of a workstation to allow additional room for movement or greater proximity to the bathroom;
- Temporary transfers to less strenuous or hazardous work;
- Time off to attend pre-natal, post-natal or fertility treatment appointments or to recover from childbirth; or
- Break time and appropriate facilities for expressing breast milk.

Employees who request an accommodation need not disclose their medical diagnosis and should, instead, indicate the nature of the limitation giving rise to the need for accommodation (e.g., back pain) and that the limitation is related to the employee's pregnancy, childbirth or related condition.

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 of the need for leave. When the need for the leave is foreseeable, the employee is required to 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 your DAHL representative. Employees must provide a copy of the completed certification form to your DAHL representative 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 her 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 require a pregnant employee or applicant to accept a reasonable accommodation if she does not have a known pregnancy-related limitation or require reasonable accommodation to perform her job's essential duties, nor will the Company require a pregnant employee to take a leave of absence instead of providing a reasonable accommodation.

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 DAHL 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.

Paid Sick Leave

The Company provides eligible employees with paid sick leave in accordance with Connecticut's paid sick leave law. The guidelines set forth in this policy do not supersede applicable federal, state or local law regarding leaves of absence, including leave taken under the Family and Medical Leave Act (FMLA) and/or as a reasonable accommodation under the Americans with Disabilities Act (ADA) or Americans with Disabilities Act Amendments Act of 2008 (ADAAA) or any other applicable federal, state or local law, including those prohibiting discrimination and harassment.

Eligibility

Regular, full-time and part-time service workers who are either non-exempt or paid on an hourly basis and who work in Connecticut are eligible to accrue paid sick leave.

The Company may allow, but will not require, employees to work additional hours during the same or following pay period in lieu of using accrued paid sick time. Decisions will be made on a case-by-case basis. Employees who wish to work additional hours in lieu of using accrued paid sick time should consult with their DAHL representative.

Reasons Paid Sick Leave May Be Used

Employees may use accrued paid sick leave for absences resulting from any of the following:

- The employee's or eligible family member's illness, injury or health condition;

- To obtain professional medical diagnosis, care or treatment for the employee's or eligible family member's mental or physical illness, injury or health condition;
- To obtain preventative care for the employee or eligible family member;
- If the employee is a victim of family violence or sexual assault and needs time off for the purpose of:

Medical care or psychological or other counseling for physical or psychological injury or disability;

To obtain services from a victim services organization;

To relocate due to such family violence or sexual assault; or

To participate in any civil or criminal proceedings related to or resulting from such family violence or sexual assault.

Eligible family members include the employee's spouse (including a same-sex spouse or out-of-state civil union or domestic partner) and child(ren).

Accrual of Leave

Leave is accrued at a rate of one hour for every 40 hours worked up to a maximum accrual of 40 hours per 365-day period used to calculate employee benefits based on employee anniversary year. Hours worked refers to actual hours worked and does not include sick, vacation or other leave time.

Employees accrue paid sick leave beginning on January 1, 2012 or the employee's date of hire, whichever is later.

Employees may use paid sick leave after the 680th hour of employment with the Company. Employees must have averaged 10 or more work hours per week in the previous calendar quarter in order to use accrued paid sick leave.

Employees may use a maximum of 40 hours of paid sick leave in any [insert 365-day period used to calculate employee benefits, such as calendar year, employee anniversary or fiscal year] year.

Increments

Paid sick leave must be used in increments of one hour or more.

Requesting Leave and Documentation

Employees must provide seven days' notice before taking leave if the need for paid sick leave is foreseeable. If the need for leave is not foreseeable, the employee must give notice as soon as practicable.

The Company requires employees who are out on leave for three or more consecutive work days and seeking compensation to provide reasonable documentation verifying

that the leave is being taken for a reason permitted under this policy. Such documentation may include:

- For leaves related to mental or physical illness, treatment of an illness and preventative care, a signed document by a health care provider indicating the need for leave and the number of days needed; or
- For leaves relating to family violence, a court record or documentation signed by the employee or volunteer working for a victim services organization, an attorney, police officer or other counselor involved with the employee.

Employees are prohibited from using paid sick leave for improper purposes.

Carry Over

Employees may carry over up to 40 unused accrued hours of paid sick leave from one year to the next, but can only use up to 40 hours of paid sick leave in any one year.

Effect on Other Rights and Policies

The Company may provide other forms of leave for employees to care for medical conditions under certain federal, state and municipal laws. In certain situations, leave under this policy may run at the same time as leave available under another federal or state law, provided eligibility requirements for that law are met. The Company is committed to complying with all applicable laws. Employees should contact their DAHL representative for information about other federal, state and municipal medical or family leave rights.

Termination

Compensation for accrued and unused paid sick leave is not provided upon separation of employment for any reason.

Retaliation

The Company will not retaliate or discriminate against employees who request or use paid sick leave for authorized circumstances or for making a complaint about suspected violations of this policy.

Jury Duty Leave

The Company encourages all employees to fulfill their civic responsibilities and to respond to jury service subpoenas, attend court for prospective jury service or serve as a juror. Under no circumstances will employees be terminated, threatened, coerced, or penalized because they respond to a jury service subpoena, attend court for prospective jury service or serve as a juror. If an employee requires time off for these purposes he or she must provide the Company with reasonable advance notice. In addition, verification from the court clerk of having served may be required.

Full-time employees (those who complete 30 hours or more of service each week and have been working in their position for more than 90 days) will receive their regular compensation during the first five days, or any part thereof, of jury service in Connecticut courts as required by Connecticut law. Any additional time off under this policy, or time off taken by employees who are not full-time, will be without pay, except that exempt employees will not incur any reduction in pay for a partial week absence due to jury duty.

An employee who has served eight hours on jury duty in any one day is considered as having worked a full day and will not be required to work past those eight hours.

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.
- To attend a court proceeding related to a civil case in which the employee is a victim of family violence.

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.

Family Violence 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:

- 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

- To participate in any civil or criminal proceeding related to or resulting from such family violence.

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, 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 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 their DAHL representative. 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 victim leave.

Emergency Responder Leave

Employees who are volunteer firefighters or members of a volunteer ambulance service may arrive late to work or be absent from work in order to respond to a fire or ambulance call prior to or during their regular hours of employment. Time off under this policy will be without pay, except that exempt employees may be paid for partial day absences, as required by law.

To be eligible for leave under this policy, employees must submit a written statement signed by the chief of their volunteer fire department or the medical director or chief administrator of the ambulance service or company, notifying the Company of the employee's status as a volunteer firefighter or member of a volunteer ambulance service or company. In addition, employees must promptly notify the Company of any change in this status.

Employees must make every effort to notify the Company on each occasion that they will be late to work or absent under this policy. The Company may require employees to submit a written statement signed by the chief of their volunteer fire department or the medical director or chief administrator of their volunteer ambulance service or company, verifying that the employee responded to a fire or ambulance call and listing the date, time and duration of the response.

Time Off to Vote or Serve as Elector

The Company encourages all employees to fulfill their civic responsibilities and to vote in public elections.

Employees will be allowed up to two consecutive hours of time off for the purpose of voting in a state election or to serve as an elector in the case of a special election.

Time off to vote will be without pay, except that exempt employees may receive pay, as required by applicable law.

Employees must provide at least two days' advance notice of the need for time off to vote, so that the time off can be scheduled to minimize disruption to normal work schedules.

Proof of having voted may be required.

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 his or her 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.

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 their DAHL representative concerning their rights and entitlements if they are, or are contemplating being, in the military service.

Civil Air Patrol Leave

Employees who are members of the civil air patrol (i.e., the civilian auxiliary of the United States Air Force) may be absent from work in order 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; 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 their DAHL representative of their status as a civil air patrol member upon 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.

Day of Rest

Employees engaged in a commercial occupation, or in the work of any industrial process, will not be required to work more than six days in a calendar week. The Company will not terminate such an employee if they refuse to work more than six days in any calendar week.

SAFETY AND SECURITY

Electronic Monitoring

The Company monitors employee use of company computer networks, electronic mail (email) systems and other company communication resources in its sole discretion. Specifically, the Company monitors email, instant messages, or internet access; video monitoring; monitoring of telephone calls, etc. Accordingly, employees should not expect that these communications are private. For additional information, please refer to the Electronic Resources policy in the National Handbook.

No audio or video recording occurs in restrooms or areas where employees change clothing.

Smoke-Free Workplace

The Company prohibits smoking in the workplace and within 25 feet of any doorway, operable window or air intake vent of the workplace. For purposes of this policy, smoking includes cannabis or hemp and the use of electronic nicotine delivery systems (e.g., electronic cigarettes, cigars, cigarillos, pipes or hookahs) or vapor products (i.e., vaping) in the workplace.

Employees wishing to smoke must do so outside company facilities during scheduled work breaks.

Employees that observe other individuals smoking in the workplace in violation of this policy have a right to object and should report the violation to their DAHL representative. Employees will not be disciplined or retaliated against for reporting smoking that violates Connecticut law or this policy.

Employees that violate this policy will be subject to disciplinary action up to and including termination of employment.

Cell Phone Use / Texting While Driving

As set forth in the National Handbook, the Company prohibits employees from using cellular phones for business reasons while driving, for any reason while driving for work-related purposes and while driving a company-owned vehicle. Employees should also be aware that creating, sending or reviewing text messages while driving or using a cell phone without a headset while driving is a violation of Connecticut law, in addition to being a violation of company policy.

Employee Data Privacy Policy

Scope and Application

This Employee Data Privacy Policy outlines the principles the Company seeks to observe regarding the collection, use, disclosure, security and disposal of personal information for its current and former United States employees and applicants (“Employees”).

Employee Personally Identifiable Information

The Company generally will collect personally identifiable information (PII) from employees, and create and maintain records about employees that contain employee PII, only for legitimate company purposes and only to the extent necessary to achieve those purposes. PII includes first name or initial and last name in combination with any of the following categories of information (as long as the information is not otherwise publicly available): Social Security Number, passport numbers, employee identification number, driver’s license number, date of birth, maiden name, mother’s maiden name, credit card or financial account information, results of background or criminal history checks, payroll and salary information, medical information, accommodation requests and related information, biometric data (such as fingerprint, voice print, retina or iris images), and/or digital or other electronic signature files.

Collection and Use of Employee PII

The Company typically will collect, create and maintain employee PII only in connection with the employment relationship. For example, the Company typically collects and uses employee PII as part of the job application process in order to make employment decisions. During the employment relationship, the Company may collect, create, use, or maintain employee PII needed for payroll administration, to provide health insurance and other benefits, for evaluating an employee’s job performance or transfer request, to evaluate leave requests made by employees, to determine fitness for duty, as part of the reasonable accommodation process, during an investigation of misconduct related to work, or for various other purposes.

From time to time, the Company may use employee PII for purposes unrelated to administration of the employment relationship. The Company, for example, might use PII to introduce new products or services to its workforce. Before making such uses of employee PII, the Company will provide employees with notice and an opportunity to opt out.

The records and databases that contain employee PII are the property of the Company, and access to the information they contain is restricted. Employees may not access, use or disclose employee PII unless authorized to do so and then only for the Company’s legitimate business purposes. The Company’s DAHL representative are responsible for establishing appropriate authorization. Generally, only company management personnel, or their designees, will receive authorization to access, use or

disclose employee PII. Employees with authorized access are required to limit their use and disclosure of employee PII to those legitimate purposes for which access was granted.

Safeguarding Employee PII

The Company is committed to safeguarding the confidentiality, integrity and availability of employee PII through the use of reasonable and appropriate physical, administrative and technical safeguards

The Company's Information Security Policy provides additional guidance on the creation, access, storage, distribution, destruction, backup and recovery of information.

Additional Safeguards for Social Security Numbers

Employee Social Security Numbers (SSNs) and documents containing employee 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 unless the document, by law, is required to include an SSN (such as a Form W-2) or in certain other limited circumstances. Employees should consult with the Law Department before including SSNs in a mailing; and
- SSNs should not be transmitted over the internet unless encrypted pursuant to the Company's Information Security Policy.

Disposal of Employee PII

Disposal of documents containing employee PII should be accomplished in a manner intended to prevent unauthorized access to such employee PII. For example, paper documents containing background or criminal history reports or any documents containing information derived from those reports should be shredded. Employee PII stored on electronic media, such as hard drives, compact disks, and back-up tapes, should be subject to processes, before disposal or reassignment, that render the employee PII irretrievable.

Disclosure and Use of Employee PII by Third Parties

The Company generally will disclose an employee's PII to third parties who are not acting as service providers for the Company only with an employee's consent, when required by law or in connection with a legal or regulatory proceeding or process, or

when disclosure is otherwise necessary or advisable. In accordance with company policies, the Company may disclose employee PII to its third-party service providers, including but not limited to benefit, payroll and workers' compensation administrators. The Company will disclose employee PII only to those service providers who have agreed to implement reasonable and appropriate safeguards for such employee PII that are similar to those required by this policy.

Violations of the Employee Data Privacy Policy

The Company is committed to ensuring that employee PII is handled in accordance with this Employee Data Privacy Policy. Anyone who is aware of a suspected or perceived violation of this policy should immediately contact their DAHL representative. Employees who violate this policy will be subject to discipline, up to and including termination of employment.