



Employment Handbook

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Introduction and Preface

Welcome from Executive Management

Thank you for being a part of Allwyn Corporation (hereafter "Allwyn"). We pride ourselves in having the most qualified people available. You can help us build on our current strengths while expanding your contributions to Allwyn's success.

You are a valued team member at Allwyn. Open communication, employee involvement and personal growth are always encouraged. Your clear understanding of the expectations and standards of employment between you and Allwyn contributes to a successful work environment.

This Employment Handbook (hereafter "handbook") provides you with general information about management's expectations and standards of this workplace, along with a general summary of the benefits of employment at Allwyn. We care about you, and having a great workplace.

We are excited to have you support our customers while upholding our core values and working within the policies and procedures outlined in this handbook.

As Allwyn continues to grow, we hope that these principles will help you.

Welcome to Allwyn! Let's do great things together!

Sincerely,
Sudhakar Garlanka, President
Allwyn Corporation

Preface

This Handbook contains information about the employment policies and practices of Allwyn. These policies reflect the Company's values, and we expect each employee to read this Handbook carefully as it is a valuable reference for understanding your job and Allwyn.

This Handbook supersedes all previously issued handbooks and any inconsistent verbal or written policy statements made or issued before this Handbook. Except for the policy of at-will employment, Allwyn reserves the right to revise, delete and add to the provisions of this Handbook. All such revisions, deletions or additions must be in writing. No oral statements or representations can change the provisions of this Handbook. No one other than the President or the CEO may alter or modify any of the policies in this handbook.

None of our personnel documents and benefit plans, including this Handbook, constitutes, or is intended to constitute, an express or implied contract guaranteeing continued employment for any employee. No supervisor has any authority to enter into a contract of employment - express or implied - that changes or alters the at-will employment relationship.

Nothing in this Handbook or in any other document or policy is intended to violate any local, state or federal law. Nothing in this Handbook is intended to limit any concerted activities by employees relating to their wages, hours or working conditions. Furthermore, nothing in this Handbook

prohibits an employee from reporting concerns, making lawful disclosures or communicating about conduct the employee believes violates any laws or regulations.

Client Policies

In the event that you are working for a client of Allwyn you will also be expected to comply with all written policies and procedures set forth by the client. This includes, but is not limited to, the following policies:

- Code of Ethics and Conduct
- General Employment Provisions
- Employee conduct
- Employee Relations
- Safety & Security
- Drug-Free & Alcohol-Free Workplace Policy
- Classified Material & Security Clearances
- Information Technology & Social Media Policies

If the client does not provide you with any policies and procedures or handbook, please follow the policies that Allwyn has set forth in the employee handbook.

Section 1: About Allwyn

1.1 About Us

Formed in 2003, Allwyn was originally set up as a consulting company with its concentration primarily in the financial industry and public sector, providing application development, business and system analysis, application architecture, and project management services. Since that time, Allwyn has expanded its suite of services, providing augmentation for engineering, retail, financial, and government agencies. We are engaged in multiple types of Information Technology services as well as Product Development. We engage in support for customer projects and ongoing operations, as well as the complete management, staffing and delivery of projects for which we assume full control and responsibility.

Allwyn's head offices are located at 459 Herndon Parkway, Suite 13, Herndon, Virginia.

As Allwyn grows, our strength and service offerings are becoming increasingly sophisticated and fine-tuned.

1.2 Our Values

We value:

- Hard work, providing value to our customers, and the ability to make both ours and our customers' working environments collaborative, enjoyable, and productive.

- Providing fair value to our employees, sub-contractors, and customers
- Respectfulness toward our customers, peers, supervisors, subordinates, and all others with whom we are in contact for our professional dealings.
- Maintaining a wholesome balance between our private and professional lives

1.3 Our Mission

To provide the highest values of service to our customers and community, while respecting our co-workers, Allwyn's values, customer policies and norms, and generally accepted ethical practices and standards of conduct.

Section 2: Code of Ethics and Conduct

2.1 Code of Ethics and Conduct Overview

Allwyn is committed to doing things right and doing the right thing. We believe in an ethical work environment where you and our partners are valued in the work that we do. "Ethics" can mean different things to different people. In this section, we clarify what we mean by an "ethical workplace" and we expect you to understand and apply our commitment – this is how we do business.

While we may not be able to address all possible ethical and compliance concerns that an employee may encounter in the workplace, this section should be considered the primary source of information regarding conduct and ethics. All decision-making should be made in the spirit of the goals of integrity and ethics set forth below.

This Code of Ethics and Conduct applies to all employees of Allwyn.

Message from our President

We strive for excellence in all we do – it's what our customers have told us they expect from us and what they admire about our organization. And that excellence also reflects a high ethical standard. Our values include respect – for each other and for our customers – and honesty in how we conduct business.

The policies in this section are intended to provide a common set of expectations about ethical behavior at Allwyn. Please let me know if you have any questions.

Questions and Reporting Non-Compliance

If you ever feel pressured to commit an act that conflicts with our Ethics Policy, believe a colleague is violating this Ethics Policy or otherwise have any questions or concerns, you should feel comfortable talking to any supervisor, human resources or the president of the company.

2.3 Conflicts of Interest

An actual or potential conflict of interest occurs when you are in a position to influence a decision that may result in a personal gain for yourself or for a relative as a result of Allwyn's business dealings.

A conflict of interest is any activity, including any employment, business, social and/or other activity, whether or not pursued for monetary advantage, that appears to be in direct or indirect conflict with Allwyn's interests or that might place you in a conflicting position to that of Allwyn.

You should conduct yourself to ensure that there are not actual or potential conflicts of interest. You should not reap unusual gains through our business dealings. Unusual gain refers to bribes, product bonuses, special fringe benefits, unusual price breaks, and other windfalls designed to ultimately benefit an outside firm, you or both. No "presumption of guilt" is created by the mere existence of a relationship with outside firms.

If you have any influence on transactions involving customers, purchases, contracts, or leases, you must immediately disclose to your supervisor the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties. Feel free to discuss any concerns that you may have with your supervisor or Human Resources.

Reporting Potential Conflicts

You must promptly disclose actual or potential conflicts of interest, in writing, to your supervisor. Approval will be given as long as the relationship does not interfere with your duties and will not damage your relationship with Allwyn or our customers.

2.4 Outside Employment and Self-Employment

You may hold outside jobs (or have your own business) as long as you meet the performance standards of your job, and as long as the employment (or self-employment) does not create a conflict of interest with Allwyn. You are required to disclose any such jobs or business interests you own in writing to Human Resources. Your outside employment activity must not compete with current or future Allwyn projects.

Please note the following requirements for outside employment:

- You may not conduct outside employment activities during work hours.
- You may not solicit customers of Allwyn for future employment opportunities or for self-employment opportunities.
- When you perform services outside of Allwyn, you must make it clear that you are not providing the services on behalf of Allwyn.

- If your outside work interferes with your performance or the ability to meet the requirements of your job at Allwyn, you may be subject to disciplinary actions up to and including termination

Outside employment that constitutes a conflict of interest is prohibited

Examples of outside employment or activities that constitute a conflict of interest include, but are not limited to:

- Any activity that can be or is harmful to Allwyn's reputation, business relationships, or potential business relationships.
- Performing services for an association that is in direct competition with Allwyn.
- Running or helping another organization that provides the same services or products that Allwyn offers.
- Making statements that end up in a public forum, including a personal website or social media that are derogatory towards Allwyn or any other employee, in violation of the Information Technology & Social Media Policies, Section 9.
- You may not receive any income or material gain from individuals outside Allwyn for materials produced or services rendered while performing your job.

2.5 Confidential Nature of Work

The protection of confidential business information is vital to the interests and success of Allwyn. Allwyn considers certain information to be confidential and/or proprietary. Such confidential information should not be communicated or disclosed, purposefully or inadvertently, without proper authorization from Human Resources or the president of the company,

Confidential Information includes, but is not limited to: customer files, customer documents, customer correspondence, customer lists, customer contact information, internal discussions regarding customers and their matters, and any and all other customer information; financial, banking and tax information; strategic plans (including marketing plans and strategies); software and computer records; passcodes and passwords; personnel records and policies; any information which Allwyn has received from a third party in confidence; and all other files, correspondence, books and records. **If you are not sure if the information you are handling is confidential, consult your supervisor at Allwyn.**

When discussing or transmitting confidential information, follow these guidelines:

- Do not reveal any confidential information except under the direction and with the approval of your supervisor.
- Make sure that confidential information is properly marked and secured before transmittal.
- Ensure that the recipient of the confidential information has a legitimate need to know the information.

- Avoid displaying confidential data where it can be easily observed, including on your computer screen when you are not at your desk.
- Immediately inform your supervisor of the loss of any confidential data.
- Limit reproduction and distribution of such information.
- Secure confidential documents in locked cabinets or containers when not in use.
- Make sure that you properly dispose of all confidential information.

Removing any confidential information from Allwyn's offices without specific authorization to do so by the President or CEO is strictly prohibited. All confidential information remains the exclusive property of Allwyn. Upon separation of employment with Allwyn, employees must return all confidential and sensitive information directly to the President or CEO.

2.6 Whistleblower Policy

Allwyn is committed to fostering a culture of integrity and to encouraging employees to report good-faith concerns regarding business-related conduct that may be unlawful. Allwyn does not tolerate any retaliatory, fraudulent, illegal or unethical business-related conduct.

A whistleblower as defined as an employee of Allwyn who reports an activity that he/she considers to be illegal or dishonest to one or more of the parties specified in this Policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Examples of illegal or dishonest activities are violations of federal, state or local laws; billing for services not performed or for goods not delivered; and other fraudulent financial reporting.

If you have knowledge of or a concern of illegal or dishonest fraudulent activity, you should contact your immediate supervisor or Human Resources. You must exercise sound judgment to avoid baseless allegations. If you intentionally file a false report of wrongdoing, you will be subject to discipline up to and including termination.

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense.

Allwyn will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact Human Resources immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

All reports of illegal and dishonest activities should be promptly submitted to the President or CEO who is responsible for investigating and coordinating corrective action.

Employees with any questions regarding this policy should contact Human Resources.

Section 3: General Employment Provisions

3.1 Equal Opportunity

Allwyn is an equal opportunity employer. In accordance with applicable law, we prohibit discrimination against any applicant or employee based on any legally-recognized basis, including, but not limited to: veteran status, uniformed servicemember status, race, color, religion, sex, age (40 and over), pregnancy (including childbirth, lactation and related medical conditions), national origin or ancestry, physical or mental disability, genetic information (including testing and characteristics) or any other consideration protected by federal, state or local law. Our commitment to equal opportunity employment applies to all persons involved in our operations and prohibits unlawful discrimination by any employee, including supervisors and co-workers

3.2 Employment At-will

Employment with Allwyn is at-will. This means that employment may be terminated for any or no reason, with or without cause or notice at any time by the employee or by the Company. Nothing in this Handbook or any oral statement will limit the right to terminate the at-will employment relationship. This at-will employment policy is the sole and entire agreement between the employee and Allwyn as to the duration of employment and the circumstances under which employment may be terminated. No manager or supervisor has any authority to enter into a contract of employment - express or implied - that changes or alters the at-will employment relationship

3.3 Employee Classifications

Employees of Allwyn are classified as either exempt or nonexempt under federal and state wage and hour laws and are further classified for administrative purposes. The following designations are used throughout this Handbook.

Exempt Employees

Exempt employees are employees whose job assignments meet specific tests established by the federal Fair Labor Standards Act (FLSA) and state law and who are exempt from minimum wage and overtime pay requirements. Exempt employees are compensated on a salary basis.

Nonexempt Employees

Nonexempt employees are employees whose job positions do not meet FLSA or applicable state exemption tests, and who are not exempt from minimum wage and overtime pay requirements. Nonexempt employees are eligible to receive overtime pay for hours worked in excess of 40 hours in a given week, or as otherwise required by applicable state law.

Full-Time Employees

Full-time employees are those who are normally scheduled to work and who do work a schedule of 35 hours per week. Full-time employees are generally eligible for the employee benefits after a 90-day probationary period as described in this Handbook and are provided with benefits required by applicable law.

Part-Time Employees

Part-time employees are those who are normally scheduled to work and who do work fewer than 35 hours per week. Part-time employees may be assigned a work schedule in advance or may work on an as-needed basis. Part-time employees are eligible for some, but not all employee benefits after a 90-day probationary period described in this Handbook and are provided with benefits required by applicable law.

Temporary Employees

Temporary employees are those who are employed for short-term assignments. Temporary employees are generally hired to temporarily supplement the workforce or assist in the completion of a specific project. These temporary employment assignments are of limited duration. Temporary employees are not eligible for employee benefits, except as required by applicable law, and may be classified as exempt or nonexempt based on job duties and compensation.

3.4 Probationary Period

All new employees will need to complete a probationary period to last 90 calendar days. This probationary period will be a time for learning about your fellow employees, your supervisor and the tasks involved in your job position. We expect you will also become familiar with other relevant information about the Company and our rules or regulations.

Your supervisor will work closely with you on all aspects of your training, understanding and responsibilities during the probationary period. We encourage new employees to get to know their fellow co-workers and supervisors quickly as this tends to help you succeed with our Company.

By completing this probationary period, an employee is not guaranteed continued employment for any term as it is always "at-will" and subject to various conditions

3.5 Immigration Law Compliance

Allwyn complies with the Immigration Reform and Control Act of 1986, which requires that Allwyn hire only individuals with authorization to work in the United States. You are required to present proof of your identity and eligibility to work in the United States when you are hired. You will be required to furnish this information on your first day of employment. In addition, all job offers extended to successful applicants are made contingent upon the receipt of the required original documentation and satisfactory completion of the USCIS Form I-9. ***Failure to provide the required documentation within legally specified timeframes will disqualify you from employment.***

3.6 Performance Appraisals

Allwyn conducts performance reviews after six months of service, as well as annually on the employee's anniversary date. Supervisors and employees are strongly encouraged to discuss job performance and goals on an informal, day-to-day basis. This will provide you and your supervisor the opportunity to discuss job tasks, identify areas of improvement, encourage and recognize strengths, and discuss positive, purposeful approaches for meeting goals. A performance appraisal does not always result in an automatic salary increase. The employee's overall performance and salary level relative to position responsibilities must be evaluated to determine whether a salary increase is warranted. Out-of-cycle salary increases must be preapproved by the department manager, human resources and the company president.

3.7 Employment Records

Employee files

Allwyn's employee files are maintained by Human Resources and are considered confidential. The employee file includes your job application, resume, job description, and records of training, performance appraisals, salary increases, and other employment and tax records. Any records of a medical nature are kept separately from your employee file.

Employee files are the property of Allwyn, and access to the information they contain is protected, for your privacy. You have the right to review your employee file under Human Resources supervision and with prior request. You may not alter, remove, add, or replace any documents in your file. You may not view the personnel records of any other employee. Supervisors may have access to review the employee file of their direct reports on a need to know basis. Supervisors considering the hire of a former employee or the transfer of a current employee may also be granted access to the employee's file. Access to the medical records will not be granted to any employee.

3.8 Personal Data Changes

Personal mailing addresses, telephone numbers, number and names of dependents, individuals to be contacted in the event of emergency, and other such information should always be accurate and current. You should notify your supervisor or the Human Resources of any changes in personal data.

3.9 Non-Disclosure and Non-Compete Policy

Every employee at Allwyn must execute a non-disclosure and non-compete agreement in accordance to the state law in the state they reside in.

Employees are prohibited from disclosing any confidential information concerning Allwyn and our clients, employees, sub-contractors and associates at all times during their employment and after separating employment with Allwyn. For definitions for confidential information see policy [2.5 Confidential nature of work](#).

As part of the non-compete agreement, employees agree that during their employment with Allwyn and for a period of two (2) years after employment is terminated by Allwyn or by the employee for any reason with or without cause:

- The employee will not directly or indirectly work for or provide any services for Allwyn's customers, clients, vendors and consultants.
- The employee will not solicit any employee or independent consultant of Allwyn on behalf of any other business.

Section 4: Employee Conduct

4.1 Commitment to a Respectful Workplace

Allwyn is committed to promoting an environment where employees are treated with respect, fairness and dignity. All employees have a responsibility to act in good faith and be active participants in contributing to the creation and enhancements of a culture of respect, inclusion, civility and understanding for the people whom they work with. Additionally, Allwyn prohibits conduct that is unlawful, offensive, insulting, intimidating, threatening, degrading, defamatory, disparaging, disrespectful, or discourteous. This policy applies to conduct towards or by its employees, executives, supervisors, coworkers, customers, vendors, independent contractors, regardless of where it happens. Incidents inconsistent with this policy should be reported directly to Human Resources.

4.2 Rules of Conduct

Allwyn expects you to follow rules of conduct that will protect the interests and safety of you, employees and Allwyn. The following guidelines have been established. A violation of any of the policies and practices set forth in the handbook and the listed prohibited conduct guidelines will result in disciplinary action, up to and including termination of employment.

Since it is impossible to list guidelines to cover every situation, the absence of an illustration from this list will not be the basis for avoiding disciplinary action when Allwyn believes such action is warranted. The activities prohibited by Allwyn include, but are not limited to, the following:

- Stealing from customers, Allwyn fellow employees or possession of stolen property on Allwyn or customer property.
- Gambling or bookmaking on Allwyn or customer property (except for major sports pools).
- Falsifying time keeping records.
- Falsification of employment applications or resumes or any Allwyn pre- or post-employment forms, or any other form of dishonesty.
- Disorderly conduct, including horseplay, fighting or threatening violence, acting in an obscene manner or using obscene, abusive, harassing, derogatory, or threatening language with other employees or customers.
- Defacing or damaging Allwyn property or customer property.
- Possession or use of weapons, firearms, or explosives, or any other object designed to cause injury or death on Allwyn property or customer property or while engaged in Allwyn business.
- Soliciting, distributing literature, or conducting unauthorized meetings of any kind on Allwyn time or property or customer time or property during working hours.
- Posting, removing or tampering with the bulletin boards or notices posted on bulletin boards without authorization or defacing any posted signs, displays, or property.

- Taking an incentive payment directly from a third-party if not approved by management or accepting unusual gains regarding business dealings that could be a conflict of interest.
- Disobeying safety regulations, including failure to promptly report work-related accidents to management.
- Insubordination, such as failure to follow a reasonable instruction of a supervisor or management.
- Using Allwyn's resources or customer's resources for personal use, including but not limited to nonwork-related internet surfing, excessive personal phone calls, shopping online, reading non-work-related news or material, extended non-business-related lunches, etc.
- Failure to observe "good housekeeping" practices by not cooperating in keeping Allwyn facilities or customer facilities clean.
- Failing to observe Allwyn security regulations or customer security regulations.
- Disclosing or distributing confidential or proprietary information as stated in Allwyn's Commitment to Ethics in the Workplace.
- Unauthorized disclosure or use of a confidential password; or accessing a system or retrieving another person's stored communications when not a required job responsibility.
- Any form of discrimination, unlawful harassment, or harassing conduct, as stated in our Anti-Discrimination and Harassment Policies.
- Any action whatsoever that tends to destroy good relations between Allwyn and its employees, or between Allwyn and any of its suppliers, customers or the public in general.
- Conduct that is an infringement of another individual's intellectual property rights.
- Any other action that violates Allwyn policy or practice, including without limitation, Allwyn's Confidentiality Policy.

4.3 Attendance Policy

All employees are expected to arrive at work at their regular scheduled time.

If employees are unable to report for work on any particular day, they must call their supervisor before the time the employee is scheduled to begin working for that day, or as soon as practical. If you cannot reach your supervisor, you should contact the next person in your management chain. It is encouraged that you speak with your supervisor personally to report an unplanned absence, however in the case you must leave a voicemail, it is required that you follow up with your supervisor later that day. If you become ill or must leave the office for any reason during the workday, you must inform your supervisor of the situation. Excessive absenteeism or tardiness may result in disciplinary action up to and including termination of employment,

If an employee fails to report for work without any notification to their supervisor and their absence continues for a period of 2 days, the Company will consider that the employee has abandoned and voluntarily terminated his or her employment.

4.4 Work Hours

Allwyn's office is open for business from 9:00 am to 5:00 pm Monday through Friday, except for Holidays. (See Holiday policy, section 10).

The standard workweek is 40 hours of work, beginning on Sunday at 12:01 am, and ending at midnight on Saturday, for purposes of computing various employee benefits.

All employees are expected to arrive at work during business hours, as per their work schedule. At the discretion of your supervisor, you may be granted an alternative work schedule, subject to consideration of the requirements, coverage, and workloads of the office.

4.5 Telecommuting

Temporary or ad hoc telecommuting arrangements may be approved for special circumstances. These arrangements are approved on an as-needed basis only, with no expectation of ongoing continuance.

All temporary or ad hoc telecommuting arrangements are made on a case-by-case basis, focusing first on the business needs of the company.

Telecommuting on a regular basis is not permitted.

4.6 Nursing Mothers Policy

Allwyn will provide a reasonable amount of break time to accommodate you if you need to express breast milk for your infant child. Allwyn will make reasonable efforts to provide you with the use of an office, room or location other than a toilet stall for you to express milk in private. You should consult with your supervisor if you have questions or need a room.

4.7 Personal Appearance and Attire

Allwyn intends to provide you with a work environment that is professional, safe and comfortable. You are expected to exercise good judgment and present a neat and clean appearance. If you interact frequently with customers or vendors, you should wear appropriate business attire. Unless otherwise indicated, business attire is required for attendance at all internal and external Allwyn events,

Throughout the workweek you may dress in Business Casual in the office. Business Casual means neat shirts, blouses, sweaters, slacks or skirts. Your clothes should fit you well, be in clean condition and suitable for the performance of the job. Keeping in mind these factors:

- Attire exposing one's shoulders, back, mid-section, chest, cleavage or undergarments is not appropriate.
- Tank tops, spaghetti straps, or revealing shirts are not appropriate.
- T-shirts with inappropriate or offensive gestures or advertising are not appropriate.
- If you report to work inappropriately dressed, you may be asked to return home to change. You will not be compensated for the time away from work if sent home.

When meeting with a customer, the dress code is more business-oriented including slacks, dress shirts or blouse, dress or skirt and blouse.

No appearance or attire code can cover all contingencies, so use your best judgment when choosing what to wear to work. If you are uncertain, ask your supervisor or Human Resources.

4.8 Telephone Courtesy

Good telephone etiquette is essential for Allwyn. Company issued telephones are intended for the use of serving our customers and conducting company business.

Personal phone calls during working hours should be kept to a minimum, except in times of extreme emergency.

Section 5: Employee Relations

5.1 Open Door Policy

Allwyn encourages its employees to bring all complaints, problems or concerns to their supervisors, senior management, or Human Resources. We believe in the right of each employee to individually discuss employment concerns and to use the Open-Door Policy to speak openly. Open and honest communication creates an atmosphere of trust and mutual respect. It allows employee concerns to be effectively addressed and resolved and fosters employee understanding of the rationale for the employer's policies, practices, and employment decisions.

As a first step is it encouraged that you raise your question or concern promptly with your supervisor. If you are not satisfied with the resolution outcome, you may appeal to senior management or Human Resources. If you are not comfortable speaking with your supervisor, you can at any time choose to consult Human Resources.

5.2 Anti-harassment

Allwyn is committed to providing a work environment that is free of illicit harassment. As a result, Allwyn maintains a strict policy prohibiting sexual harassment and harassment against applicants and employees based on any legally-recognized basis, including, but not limited to: veteran status, uniformed servicemember status, race, color, religion, sex, pregnancy (including childbirth, lactation and related medical conditions), national origin or ancestry, physical or mental disability, genetic information (including testing and characteristics) or any other consideration protected by federal, state or local law. All such harassment is prohibited.

Our anti-harassment policy applies to all persons involved in our operations and prohibits harassing conduct by any employee of Allwyn at any level. This policy also protects employees from prohibited harassment by third parties, such as vendors, customers, or temporary or seasonal workers. If such harassment occurs on the job by someone not employed by Allwyn, the procedures in this policy should be followed.

Definitions

Sexual Harassment

Sexual harassment includes unwanted sexual advances, requests for sexual favors or visual, verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made a term or condition of employment; or
- Submission to, or rejection of, such conduct is used as a basis for employment decisions affecting the individual; or
- Such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment also includes various forms of offensive behavior based on sex. The following is a partial list:

- Unwanted sexual advances.
- Offering employment benefits in exchange for sexual favors.
- Making or threatening reprisals after a negative response to sexual advances.
- Visual conduct: leering, making sexual gestures, displaying of sexually suggestive objects or pictures, cartoons, posters, websites, emails or text messages.
- Verbal conduct: making or using derogatory comments, epithets, slurs, sexually explicit jokes or comments about an employee's body or dress.
- Verbal sexual advances or propositions.
- Verbal abuse of a sexual nature, graphic verbal commentary about an individual's body, sexually degrading words to describe an individual, suggestive or obscene letters, notes or invitations.
- Physical conduct: touching, assault, impeding or blocking movements.
- Retaliation for making reports or threatening to report sexual harassment.

Other Types of Harassment

Harassment on the basis of any legally protected classification is prohibited, including harassment based on veteran status, uniformed service member status, race, color, religion, sex, pregnancy (including childbirth, lactation and related medical conditions), national origin or ancestry, physical or mental disability, genetic information (including testing and characteristics) or any other consideration protected by federal, state or local law. Prohibited harassment may include behavior similar to the illustrations above pertaining to sexual harassment. They include conduct such as:

- Verbal conduct including threats, epithets, derogatory comments or slurs based on an individual's protected classification.
- Visual conduct including derogatory posters, photography, cartoons, drawings or gestures based on protected classification; and

- Physical conduct including assault, unwanted touching or blocking normal movement because of an individual's protected status.

Complaint Procedure

Any employee who believes that he or she has been subjected to prohibited harassment, discrimination or retaliation by a co-worker, supervisor, agent, vendor or customer of Allwyn, or who is aware of such harassment, discrimination or retaliation of others, should immediately provide a written or verbal statement to his or her supervisor, any other member of management or Human Resources regarding such incidents.

After a statement is received, a thorough and objective investigation by management will be undertaken. The investigation will be conducted and completed in a timely manner, however the exact steps of the investigation, and the time necessary to complete it will vary on a case by case basis.

If a complaint of prohibited harassment or discrimination is substantiated, appropriate disciplinary action, up to and including termination of employment, will be taken.

5.3 Confidentiality and Anti-retaliation

Complaints are handled with discretion, preserving confidentiality to the extent practical while ensuring that the complaint or issue is investigated thoroughly. However, complete confidentiality cannot be promised or guaranteed.

Allwyn strictly prohibits any form for retaliation against an employee who in good faith makes a complaint, raises a concern, provision information or otherwise assists in an investigation regarding any conduct that he/she reasonably believes to be in violation with Allwyn's policies or applicable laws, rules or regulations.

5.4 Disciplinary Actions

You are expected to meet established standards of attendance, performance, and conduct. If you demonstrate poor attendance, substandard work performance, or unacceptable conduct, you will be subject to review and disciplinary action. Disciplinary action is exercised at the discretion of management, based on the specific situation and its severity. Disciplinary action may include first notice, second notice, third notice, and termination of employment. Final determinations as to discipline are left to Allwyn's sole discretion.

Section 6: Compensation

6.1 Time Keeping

Accurately recording is the responsibility of every employee. Federal and state laws require Allwyn to keep an accurate record of time worked to calculate your pay and benefits. Time worked is all the time spent on the job performing assigned duties. Applicability of local laws may affect work schedules and reporting. Falsifying a time record may result in disciplinary action up to and including termination.

You must sign or otherwise approve your time submissions to verify that the reported hours worked are complete and accurate (and that there is no unrecorded or "off-the-clock" work). Your time submission must accurately reflect all hours worked, any absences, early or late arrivals and early or late departures. Overtime work must always be approved in advance. Time records are used to calculate overtime pay.

Within five calendar days at the end of every payroll period, you should submit your completed time submission for verification and supervisor approval. When you receive each paycheck, you should verify immediately that you were paid correctly for all hours worked each workweek.

Payroll will review the time worked before submitting it for payroll processing. If corrections or modifications are made to the time sheet, both you and your supervisor must verify the accuracy of the changes by approving the adjustment.

Violations

You may not falsify a timecard or alter someone else's timecard. You may not, and your supervisor may not, instruct another employee to incorrectly or falsely report hours worked or alter another employee's timecard, or to under-or over-report hours worked.

No one should ever instruct you to alter another employee's time records to inaccurately or falsely report that employee's hours worked; conceal any falsification of time records or to violate this policy; or remote falsify a time record. If any of these situations happen, you should report it immediately to authorized personnel. Every report will be fully investigated.

Allwyn does not tolerate retaliation against employees who report alleged violations of this policy or who cooperate in Allwyn's investigation of such reports.

6.2 Payroll

All employees are paid once a month. In the event that a regular scheduled payday falls on a weekend or holiday, employees will be paid on the business day before the regular scheduled payday. Paychecks are deposited directly into an employee's bank account using direct deposit ACH and all incoming employees are required to sign up for direct deposit.

Mandatory deductions will be taken out of each employee's paychecks. Mandatory deductions include:

- Federal and state income taxes (based on an individual's W-4 filing status; W-4 filing status may be changed at any time by filing a new W-4 form with Payroll)
- Social Security taxes; and
- Medicare taxes

Routine questions about tax deductions may be directed to Payroll. Advice on tax withholding strategies, however, should be discussed with a personal accountant or financial planner/advisor.

6.3 Overtime Pay

Allwyn pays each non-exempt employee overtime at a rate of one and one-half times the employee's regular rate for all hours worked in excess of 40 hours per workweek.

As required by law, overtime pay is based on actual hours worked. Time taken for meal periods is not included as time worked for purposes of computing overtime. Time off on holidays, sick leave, PTO, personal leave, or any leave of absence will not be considered hours worked for purposes of overtime calculations.

Nonexempt employees are prohibited from working "off the clock" for any reason. If any supervisor or manager directs any employee to do so, the employee must contact Human Resources immediately.

Before any nonexempt employee performs additional work outside of his or her regularly scheduled hours, the employee must obtain authorization from his or her supervisor approving the additional hours, including working during lunch or coming in early. If the employee fails to obtain authorization, the overtime will be paid; however, the employee will be subject to corrective action for this policy violation.

Any supervisor or manager who fails to pay overtime to an employee, regardless of whether the overtime was authorized, will be subject to corrective action, including termination of employment

6.4 Pay Transparency

Allwyn will not terminate or in any other manner discriminate against you or any applicants because you have inquired about, discussed, or disclosed your own pay or the pay of another employee or applicant. However, if you have access to the compensation information of other employees or applicants as a part of your essential job functions, you must not disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by Allwyn, or (c) consistent with Allwyn's legal duty to furnish information.

6.5 Business Expenses

You are eligible for reimbursement of company-related expenses with the approval of your supervisor. In general, expenses must be reasonable, ordinary, and necessary business-type expenses to be reimbursable, such as travel costs, mileage, meals, etc. You must submit an expense report with appropriate approval to Accounts Payable/Payroll department, along with appropriate supporting documentation for expenses to be reimbursed. Reimbursements will be included in the employee's next regularly scheduled pay.

Section 7: Benefits

7.1 Benefits Overview

Benefits represent a significant part of your total compensation. Our benefits program has been designed to offer you peace of mind in protecting against illness and injury and to provide you with opportunities to build for your future. The benefits listed below is an overview of the benefits offered, details are provided in the benefits brochure. These benefits may be subject to change. See Human Resources for more information about your benefits.

Allwyn offers:

- Medical insurance
- Dental insurance
- Vision insurance
- Flexible spending accounts
- 401K

7.2 Workers' Compensation Insurance

Allwyn provides a comprehensive workers' compensation insurance program at no cost to you. This program covers any injury or illness sustained during employment that requires medical, surgical, or hospital treatment. Subject to the applicable legal requirements, workers' compensation insurance provides benefits after a short waiting period or, if you are hospitalized, immediately.

If you sustain work-related injuries or illnesses, you should inform your supervisor immediately. No matter how minor an on-the-job injury may appear, it must be reported immediately.

Reporting Work-Related Injuries and Illnesses

If you are hurt or injured on the job, regardless of how insignificant the injury may appear, you should notify your supervisor within 24 hours of the incident. Such reports are necessary to ensure that you get the care you need and to comply with the law. Allwyn will then initiate insurance and workers' compensation benefits procedures on your behalf.

All Incident Reports must be sent to Human Resources and these reports will be filed and maintained by Allwyn. This includes injuries or illnesses requiring basic first-aid as well as those requiring medical treatment.

Incident reports must include the following information:

- The date and time that the injury occurred.
- The physical location (address) that the injury occurred.
- Nature of the injury.
- What you were doing at the time the injury occurred.

- A list of witnesses and contact information.
- If medical attention was sought.
- Who provided medical attention (including contact information for this person)
- If any worktime was missed due to the injury, along with dates and hours missed.

7.3 Training and Education

Continuing your education is one of the ways to further your career. Although Allwyn does not have an Educational Assistance policy in place at this time, we encourage our employees who are interested in continuing education and job specific training to attend conferences, seminars, or courses after receiving prior approval from management.

7.4 Employee Referral Program

Allwyn is dedicated to hiring the most highly qualified candidates for our job openings. As such, we always encourage you to identify friends or acquaintances who are interested in employment opportunities and refer qualified outside applicants for posted jobs. Employees are eligible to receive \$500 to \$1000 for employment referrals for certain open positions, Employees will receive payment in their paycheck immediately following the referred employee's hire date. See Human Resources for more information.

7.5 Leave Policies

Maintaining a healthy work-life balance is critical to your long-term health and productivity. We offer a variety of programs to support your time away from work.

7.5.1 Paid Time Off (PTO)

Time away from work to relax and pursue special interests is important to everyone. Allwyn encourages all employees to make the most of their PTO.

Allwyn offers PTO based on the position, level of experience and seniority level to all regular full-time employees. PTO is accumulated on a monthly accrual basis.

Below are guidelines to using your PTO:

- PTO may be taken in half-day increments.
- All PTO related requests must be approved in advance by your supervisor with at least 2 weeks' notice, unless being used for a sick day.
- A maximum of 80 PTO hours may be carried over from one calendar year to the next.
- No more than 80 PTO hours may be taken at one time.
- Holidays observed by Allwyn, which occur during PTO periods will be counted as holiday pay and not counted towards your PTO.

Upon termination of employment, Allwyn will pay out unused and accrued PTO up to 80 hours on the employee's final paycheck.

PTO offered by Allwyn meets the sick and safe leave requirements of CA, TX, MD, DC and NY.

7.5.2 Paid Holidays

All employees of Allwyn are granted ten (10) paid holidays. Allwyn's recognized holidays are:

- New Year's Day
- Martin Luther King Jr. Day
- Presidents Day
- Memorial Day
- Juneteenth Day
- Independence Day
- Labor Day
- Veterans Day
- Thanksgiving Day
- Christmas Day

If you are on assignment at a customer site, you must observe the holidays of the customer company.

*Company paid list of holidays/PTO accruals are not applicable to W-2 hourly and part-time employees.

7.5.3 Jury Duty and Court Appearances

If you are called to serve on a jury or as a witness, you will be excused from work to perform this service. You are required to notify your supervisor as soon as you receive notice that your service is required, and you must bring a copy of the notice to your supervisor and Human Resources. When dismissed from jury duty earlier than expected, you must report to work. When serving jury duty, you should provide the hours-worked receipt from the relevant court agency when you return to work. This receipt should be attached to your timesheet and noted accordingly on the timesheet. For NY employees, Allwyn will pay you \$40 a day for up to 3 days if you are called for Jury Duty. This is in accordance to NY state law.

7.5.4 Inclement Weather and Emergency Closures

In instances of severe weather, Allwyn wants to ensure your safety and well-being as a high priority. Employees must check with their customer to see if the customer's site will be open. You should consult Human Resources and the customer to determine your course of action for the day.

To continue to support Allwyn customers in a timely manner, you may work from home on the days in which the weather is too severe to prevent safe travel to/from the Allwyn office or customer office, use your best judgement. If you choose to work from home you must notify an executive before you are scheduled to begin work. You must check with the customer to see if working from home is an option. If you are not able to work from home, then you must use PTO or take unpaid time off.

In the event of other emergency closings, such as electrical outages or flooding, Allwyn will notify you of a closure as determined by the President or CEO.

7.5.5 Voting Leave

You should be able to vote either before or after regularly assigned work hours. However, if you do not have two continuous hours of off-duty time during the period the polls are open on Election Day, you will be granted a reasonable period, up to two hours, during the work day to vote. Notice is required so that the necessary time off can be scheduled at a time that provides the least disruption to the normal work schedule. To receive this paid leave, you must obtain a receipt from your polling place indicating that you voted and present it to your supervisor upon return to work. Time off for voting must be reported and coded appropriately on timekeeping records.

7.5.6 Bereavement Leave

In the event of a death in the immediate family, all regular full-time employees will be allowed time off with pay for a maximum of three (3) days. If additional time is required, a personal leave of absence without pay may be granted at the discretion of your supervisor, or PTO may be used.

Members of the immediate family are spouse/significant other, children (including in-laws), parents (including in-laws), siblings (including in-laws), grandparents, and grandchildren. Step relatives are included as immediate family. Paid bereavement leave will only be granted after you have been with Allwyn for 90 days of employment.

A bereavement leave allowance of one day, with pay, will be granted, to attend funeral services for a family member other than an immediate family member, including cousins, aunts, or uncles.

7.5.7 Unpaid Leaves of Absence

You may be granted an unpaid leave of absence for a specified period for short-term injuries or illnesses, including pregnancy. You must have one year of service and have worked 1,250 hours to be considered for a leave of absence. Requests for leaves of absence must be made in advance to the extent possible; must be submitted in writing; and are subject to approval by the employee's supervisor and Human Resources.

7.5.8 Military Leave

Allwyn supports our military and complies fully with USERRA guidelines. You should notify Allwyn of any military leave requirement to your supervisor and Human Resources when you are notified of your duty to serve. If you are required to take two (2) weeks annual military training, you will be granted a leave of absence without pay. You may use PTO during this time. All other military leave, including deployment, will be granted as required by federal and state law.

In accordance with the provision of the *Uniformed Services Employment and Reemployment Rights Act of 1994 ("USERRA")*, Allwyn will provide employment of equal or greater salary and responsibility to employees returning from involuntary military activation and service. If you who are activated into involuntary military service and can no longer perform your duties with respect to Allwyn, you will no longer receive salary or benefits from Allwyn. Allwyn will make all reasonable efforts to provide the employee with equal or greater salary.

7.5.9 Furloughed Leave

If employees are placed on Furlough, per Allwyn's or the client's instruction they have a choice of either 1. Using their paid time off (PTO) to cover the time off or 2. Taking leave without pay. If employees wish

to use their PTO they must do it in 40 hour increments (one full work week), if they do not have 40 hours of PTO to cover the week they are Furloughed, must take leave without pay for the entire week.

Section 8: Safety & Security

8.1 Safety

Allwyn is committed to your health and the well-being of all employees or all persons who visit Allwyn premises. Allwyn's ability to promote and maintain a safe workplace and safe working conditions depends on the mutual cooperation of all supervisors and employees and is of the utmost importance. Allwyn encourages you to use common sense, precautionary behaviors, and the vigilance of those around you to assist Allwyn in preventing accidents of any kind. Some of the best ideas for safety improvements come from you. If you have ideas, concerns, or suggestions for improved safety in the workplace, you should raise them with your supervisor, or bring them to the attention of Human Resources.

Allwyn provides a workplace for its employees in compliance with the Occupational Safety and Health Act and applicable regulations. The office building where Allwyn is located maintains first-aid kits and fire extinguishers. All employees should learn the location of these items for emergency usage. You must also read and understand any and all safety policies of Allwyn. You must report any safety concerns, hazardous conditions, property in need of repair, injuries, or unsafe practices to your supervisor, the Human Resources or President or CEO immediately so Allwyn can take prompt action.

Employees who violate safety standards, cause hazardous or dangerous situations, or fail to report, or where appropriate remedy such situations, may be subject to disciplinary action including termination of employment.

8.1.1 Parking

Allwyn is not responsible for damages or theft that may occur to your vehicle while parked for work at Allwyn or at a customer site.

8.1.2 Security

While we strive to maintain security at the office, you are also responsible for making the workplace secure for everyone. You should be aware of the potential problems of theft. All Allwyn property such as computers, etc., should be kept locked when not being used. In addition, all your valuables (including purses, wallets, etc.) should be locked up when you are away from your workspace.

You must immediately report to your supervisor any lost security badge and key code. You are prohibited from sharing your security badge and key code with anyone who does not work here. Furthermore, you must ensure that any guest of Allwyn (including any former employee) is escorted throughout the premises.

All employees who are issued keys to the office are responsible for their safekeeping. The last employee, or designated employee, who leaves the office at the end of the business day assumes the responsibility to ensure that all doors are securely locked, the alarm system is armed, thermostats are set on appropriate evening and/or weekend settings, and all appliances and lights

are turned off with exception of the lights normally left on for security purposes. Employees are not allowed on Company property after hours without prior authorization from Executive Staff.

8.1.3 Threats, Acts of Violence, & Emergency Reporting Procedures

You are expected to report incidents of threats or acts of physical violence of which you are aware. The report should be made to your immediate supervisor, Human Resources or the President or CEO.

However, in the event of an emergency, or any other circumstances that require police intervention or emergency medical attention, you should call 911 prior to taking any other action to notify appropriate authorities.

You must be familiar with the evacuation route for your location.

8.1.4 Personal Responsibility

We all share responsibility for doing our part to prevent acts of violence. If you believe that you are a possible target of violence, because of events occurring either on Allwyn premises or at customer locations, report this situation to your supervisor or Human Resources. Use your best judgment as to whether it is safe for you to report to work until the situation has been resolved, and Allwyn reserves the right to make that decision for you.

8.1.5 Tobacco-Free Workplace

To comply with government regulations and to promote a healthy workplace, Allwyn prohibits any use of tobacco or vaping products throughout the workplace, including Allwyn offices, common areas, and use areas are expressly designated outside the building.

8.1.6 Prohibition and Deterrence of Workplace Violence

Acts or threats of physical violence, including intimidation, harassment, and/or coercion, which involve or affect Allwyn or which occur on Allwyn property will not be tolerated. Acts or threats of violence includes conduct that is sufficiently severe, offensive, or intimidating to alter the employment conditions at Allwyn or to create a hostile, abusive, or intimidating work environment for Allwyn employees. Examples of workplace violence include, but are not limited to, the following:

- All threats or acts of violence occurring on Allwyn premises or customer premises, regardless of the relationship between Allwyn and the parties involved in the incident.
- All threats or acts of violence occurring off Allwyn premises or customer premises involving someone who is acting in the capacity of a representative of Allwyn.
- All threats or acts of violence occurring off Allwyn premises or off customer premises involving an Allwyn employee if the threats or acts affect the legitimate interests of Allwyn.
- Any acts or threats resulting in the conviction of an employee or agent of Allwyn or of an individual performing service for Allwyn on a contract or temporary basis, under any criminal code provision relating to violence or threats of violence which adversely affect legitimate Allwyn interests and goals.
- Specific examples of conduct that may be considered threats or acts of violence include, but are not limited to, the following:
 - Hitting or shoving an individual.

- Threatening an individual or his/her family, friends, associates, or property with harm.
- The intentional destruction or threat of destruction of Allwyn property or customer property.
- Harassing or threatening phone calls.
- Harassing surveillance or stalking.
- The suggestion or intimation that violence is appropriate.
- Unauthorized possession or inappropriate use of firearms or weapons.

Any employee found to be engaging in workplace violence will be disciplined up to and including termination of employment.

Section 9: Drug-Free & Alcohol-Free Workplace Policy

Allwyn depends on its greatest asset, the work performance of its staff members to produce the highest quality of service for our customers. Allwyn's concern for the health, safety and welfare of all staff members, customers, and property requires that we operate as a Drug and Alcohol-Free Workplace.

9.1 Drug Free Workplace Requirements

In compliance with the Drug Free Workplace Act of 1988:

- The use and abuse of drugs (prescription and illegal drugs) and alcohol seriously affects your performance and can result in accidents, reduced productivity, absenteeism, and increased medical costs. Allwyn is committed to an alcohol- and drug-free working environment to ensure the safety of its staff members.
- You may not unlawfully manufacture, distribute, dispense, possess or use a controlled or illegal substance (including alcohol or prescription drugs) in the workplace or while performing official work. If you break this rule, you will be the subject of appropriate disciplinary action up to and including termination of employment. In addition, you may be subject to criminal penalties.
- As a condition of employment with Allwyn, you shall:
- Abide by the terms of this policy.
 - Notify the President or CEO of any criminal drug statute conviction for a violation occurring in the workplace or during the discharge of official duties no later than five days after such conviction.
 - Allwyn reserves the right to conduct searches of Allwyn property/premises and customer property/premises and to require you to submit to searches or testing (including when reasonable suspicion of drug abuse exists) in the event of possible violation of this policy. Because Allwyn reserves the right to conduct such searches, you should not have any expectation that such property/premises are private and outside of any search rights.
- Should there be any reasonable suspicion of drug use, you will not be permitted to work and may be required to submit to reasonable suspicion drug testing.

Consent to Search

By becoming or remaining employed by Allwyn, you are deemed to have consented to such searches described in this section.

9.2 Alcohol at Allwyn Events

Allwyn holds events and meetings where alcohol is served. You are permitted to drink alcohol in moderation during these events. However, you are reminded that we are "still working" at these events and need to provide full support and attention to our work responsibilities, as well as preventing organizational liability. Alcohol will not be considered an excuse for misconduct or poor judgment. Additionally, if we are invited to attend other meals or events sponsored by our customers or other organizations, you are not permitted to drink alcohol at these events.

Section 10: Classified Material & Security Clearances

This section applies only to employees who require a security clearance as part of their employment with Allwyn.

10.1 Classified Material Clearance

Access to classified information requires a security clearance issued by the U.S. Government

If a supervisor or other program official decides that you need classified access, you will be asked to complete a Personal Security Questionnaire, which along with supporting documents will be forwarded to clearance granting authorities.

After a clearance has been granted, you must attend a security indoctrination briefing that will outline your responsibilities. You will also sign a nondisclosure agreement at this time. You will not be allowed access to classified information until a clearance has been obtained and you are briefed.

All employees at Allwyn will be required to take periodic training and refreshers about the security classification system including "need to know" requirements.

10.1.1 Access Requirements and Need-to-Know

Access to classified information occurs when you have the ability and opportunity to obtain knowledge of classified information. Authorized access to classified information may be granted only when two conditions are met. First you must have a valid and current security clearance at a level at least as high as the information to be released. Second, you must demonstrate the need for access to classified information. This is referred to as Need-to-Know.

Need-to-Know is met when access to classified information is essential to the performance of your job duties in fulfilling a classified contract. Each individual, regardless of rank, position, or amount of clearances and accesses, only has a Need-to-Know for information pertinent to the performance of his/her specific task or project. Need-to-Know is not the same as want to know. Individuals must always establish a person's Need-to-Know before sharing classified information.

The possessor of classified information must ensure the proper clearance and Need-to-Know of the recipient. The possessor must also advise the recipient of the classification of the information disclosed.

Need-to-Know confirmation should come from a security department advisor or representative. If there is doubt as to whether a person has a Need-to-Know, you should check with the proper authority prior to release of any classified information.

10.1.2 Report to Security

- Employees are asked to report to the Office of Security in any of the following situations:
- Any unauthorized attempt to solicit classified information.
- Any classified material being made accessible to the employee before receiving a clearance.
- Any information relating to threatened espionage, sabotage, or subversive activity.
- Any threats to Allwyn security.

In addition, any possible compromise of Allwyn proprietary or sensitive, unclassified information should be reported to the customer site's security officer and your supervisor. For more information, refer to Employee Reporting Requirements at your customer site.

10.1.3 Security Hotline Phone Numbers

The following are security hotline phone numbers for those employees working in classified positions:

Department of Defense

The Pentagon
Washington, DC 200301-1900
Washington, DC 20505
(703) 693-5080
(703) 874-2600
800-541-1625

Office of Research Services

National Institutes of Health
31 Center Drive
Building 31, Room 1B03
Bethesda, MD 20892
Phone: (301) 451-9381

U.S. Environmental Protection Agency

Office of Inspector General Hotline
1200 Pennsylvania Avenue, NW
Mail code 8431P (Room N-4330)
Washington, DC 20460.

10.1.4 Security Violations

Our national security, as well as the country's ability to compete internationally, depends on both cleared and un-cleared personnel adhering to security procedures. As such, security violations need to be reported so Allwyn or our customers can take disciplinary actions, change procedures, or conduct a damage assessment.

Your performance impacts Allwyn. Blatant disregard of security clearance and procedures may affect your continued eligibility for access to classified information. In severe cases, your clearance may get revoked. For Allwyn, each violation affects Allwyn's security posture, which in turn affects its ability to compete in

the classified marketplace. Excessive or severe violations may bar Allwyn from participating in classified contracts altogether. When an organization demonstrates a pattern of inadequate protection of classified information, the government has the right to revoke Allwyn's clearance, which can impact the livelihood of Allwyn. Failure to abide by security measures is subject to progressive discipline, up to and including termination of employment and/or criminal charges.

The safeguarding of classified information is the responsibility of all personnel. If an individual, regardless of clearance level, finds unprotected classified material, he/she should secure them to prevent further compromise. Alerting a supervisor of the discovery of such material protects both you and Allwyn from further liability with regard to the material.

Section 11: Information Technology & Social Media Policies

11.1 Information Technology Policy

Allwyn invests in information technology to help you do your work and to improve our communication with each other and with our customers. Since technology is constantly evolving, no written policy can cover every aspect of this area. Therefore, we expect you to respect and adhere to our intent of these policies.

Allwyn computers, networks and associated equipment should be used for business purposes. This includes, but is not limited to, computers, computer files, telephones, email systems, access to the Internet, and software. Incidental personal use is permitted, provided such use is limited and does not interfere with Allwyn's business and does not violate any of Allwyn's policies.

There is no exception of privacy when using Allwyn's computers or networks. Allwyn reserves the right to intercept, monitor, record, copy and inspect any and all computing and network activity, equipment and information.

You are reminded that the use of Allwyn's IT resources should never create either the appearance or the reality of inappropriate use. You should never access, forward, or otherwise process prohibited or offensive materials. For example, materials that contains discriminatory, offensive, threatening, insulting, intimidating, degrading or harassing content. This includes but is not limited to words, pictures, and symbols. If there is a question of whether or not the materials might be considered offensive, the materials should be avoided. Accessing, processing or forwarding offensive material will result in disciplinary action up to and including termination.

Unacceptable use

The following activities are prohibited:

- Engaging in any activity that is illegal under local, state, federal or international law in conjunction with the use of Allwyn's IT systems.
- Using someone else's password, accessing someone else's files or system, or retrieving stored communication that is not yours without proper authorization.
- Modifying, disabling, or circumventing security settings , configurations , software or hardware without proper authorization
- Transferring any and all information which resides on Allwyn's network for personal use or to a non Allwyn personnel who is not authorized to receive such information

- Installation or deployment of server hardware, software or functionality including but not limited to, web servers. File Transfer Protocol Servers, file services, printers servers or email servers. **If a program/software is needed, contact the IT Consultant to install the program for you.**

General Guidelines

- Any information or data that you create, transmit, receive or store when using company equipment or systems is not private.
- You may occasionally email for personal business. These communications will be treated the same as other messages and are not private. Since Allwyn management can access your personal communications without prior notice, you should not use email to send messages you would not want to share. Use of your Allwyn computer and the Internet for personal reasons, including storing personal files on your computer, should be kept to a minimum.
- You should conduct yourself legally, ethically, and appropriately on the Internet. This includes respecting the copyrights, software licensing rules, property rights, privacy and prerogatives of others, just as you would in any other business setting.
- You should not engage in unnecessary, unauthorized, or unlawful Internet usage. These activities may cause network and server congestion that can slow down other users and tie up shared resources. Unlawful Internet usage may also create negative publicity and expose Allwyn to significant legal liabilities.
- Allwyn may block access from within its networks to sites deemed inappropriate or insecure. If you accidentally connect to such a site, disconnect immediately and alert the IT Consultant so they can make sure your system has not been compromised.

11.2 Social Media Policy

At Allwyn, we understand that social media can be a fun and rewarding way to share your life and opinions with family, friends, and co-workers around the world. However, use of social media also presents certain risks and carries with it certain responsibilities. To assist you in making responsible decisions about your use of social media, we have established these guidelines for appropriate use.

In the rapidly expanding world of electronic communication, *social media* can mean many things. Social media includes all means of communicating or posting information or content on the Internet. This includes your own or someone else's web log or blog, journal or diary, or your personal website. We also include social networking (including but not limited to Facebook, Twitter, Instagram, LinkedIn) or affinity websites, web bulletin board or a chat room, whether or not associated or affiliated with Allwyn, as well as any other form of electronic communication.

You should refrain from using social media while at work or on equipment Allwyn provides, unless it is work-related as authorized by your supervisor and consistent with Allwyn's Information Technology Policy. Do not use Allwyn email addresses to register on personal social networks, blogs or other online tools.

The same principles and guidelines found in other Allwyn policies apply to your activities online. You are solely responsible for what you post online. Before creating online content, consider some of the risks and rewards that are involved. Keep in mind that any of your conduct that adversely affects your job performance, the performance of fellow associates or otherwise adversely affects customers, suppliers, people who work on behalf of Allwyn or Allwyn's interests may result in disciplinary action.

Know and Follow the Rules

Carefully read our guidelines Commitment to a Respectful Workplace policy in Section 4. Ensure your postings are consistent with these policies. Postings that include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated.

Be Respectful

Always be fair and courteous to fellow employees, customers, suppliers or people who work on behalf of Allwyn. Keep in mind that you are more likely to resolve work-related complaints by speaking directly with your co-workers or by utilizing our Open-Door Policy than by posting complaints to a social media outlet. If you decide to post complaints or criticism, avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating. Do not disparage anyone or post something that might constitute harassment or bullying. You should not post anything that would intentionally harm someone's reputation, or post something that could contribute to a hostile work environment on the basis of any status protected by law or Allwyn policy.

Be Honest and Accurate

Be honest and accurate when posting information or news. If you make a mistake, correct it quickly. Be open about any previous posts you have altered. Remember that the Internet archives almost everything; therefore, even deleted postings can be searched. Never post any information or rumors that you know to be false about Allwyn, fellow employees, customers, suppliers, or vendors working on behalf of Allwyn or competitors.

Post Only Appropriate Content

- **Maintain the confidentiality of Allwyn trade secrets and private or confidential information.** Trade secrets may include information regarding the development of systems, processes, products, know-how, and technology. Do not post internal reports, policies, procedures or other internal business-related confidential communications.
- **Respect financial disclosure laws.** It is illegal to communicate or give a "tip" to others so that they may buy or sell stocks or securities.
- **Do not create a link** from your blog, website or other social networking site to Allwyn website without identifying yourself as an Allwyn employee.

11.3 Data Encryption Policy

At Allwyn, all sensitive information such as Personally Identifiable Information (PII) and confidential business information must always remain protected while stored at rest and in transit. Any confidential data transmitted through private networks, public networks (e.g., internet) or wirelessly whether internally and/or to customers, clients, vendors, or entities conducting business with Allwyn must be encrypted using the technologies/tools provided by the company.

Using web email applications (Gmail, Yahoo, Hotmail etc.) that send unencrypted data is strictly prohibited.

Definitions

PII (Personally Identifiable Information)

PII is information that, when used alone or with other relevant data can identify a specific person.

For example: Data such as full name, date of birth, address, social security number, passport number, driver's license number, credit card number etc. are considered PII.

Other data, such as a common first name, first initial and last name, race, gender or part of an address (country, state, city, postcode) may not be able to identify a person however when combined with another piece of information could be defined as PII.

Confidential information

Confidential information is information about the company that should not be made public. If this type of information was released it could be harmful to the company.

For example: trade secrets, client files, proprietary information, business negotiations etc.

Data at rest

Data at rest is defined as data that is not in use or is not travelling from one device to another. This data can be stored on hard drives (including portal hard drives) or removal media.

Data in transit

Data in transit is data that is communicated from one device to another. Data in transit can be transmitted over a public network such as the internet, or a private or wireless network.

Section 12: Termination of Employment

12.1 Employment-at-will and Allwyn Property

Employment with Allwyn is voluntary and subject to termination by the employee or Allwyn at will, with or without cause, and with or without notice, at any time. Nothing in this policy shall be interpreted to conflict with or to eliminate or modify in any way the employment-at-will status of Allwyn employees. Upon termination, regardless of reason, all Allwyn property must be immediately turned in to your supervisor or Human Resources, including, but not limited to, laptops, iPad, cellphones, Security badge and key code, credit cards, computer disks/flash drives, customers' lists, and other documents.

12.2 Voluntary Termination

Although we hope your employment with us will be a mutually rewarding experience, we understand that you may voluntarily resign or retire for any number of circumstances. If you decide to resign, as an exempt employee, you are encouraged to provide four (4) weeks' written notice, or as a non-exempt employee, you are encouraged to provide two (2) weeks' written notice to facilitate a smooth transition out of Allwyn. Employees who voluntarily resign will be paid out up to 80 hours for your unused and earned PTO.

12.3 Involuntary Termination

An involuntary termination of employment, including a layoff, is a management-initiated dismissal with or without cause. Employees may be terminated involuntary or "for cause" for several reasons including:

- Performance
- Problems or misconduct
- Involuntary (without fault) for business reasons

All involuntary terminations must be approved by the employee's supervisor and coordinated with Human Resources.

Employees who are terminated for cause (regardless of reason) are not paid out for unused and earned PTO at termination of employment.

12.4 Job Abandonment

If you fail to report to work or contact your supervisor for two (2) consecutive workdays, you shall be considered to have abandoned the job without notice, effective at the end of your normal shift on the second day. The supervisor must notify Human Resources at the expiration of the second workday and initiate separation paperwork. If you are terminated due to job abandonment, you are ineligible to receive accrued benefits including pay-out of unused and earned PTO.

12.5 Final Paychecks

Your final paycheck will be available at the next regularly scheduled payroll date following termination, unless special circumstances or state law dictate differently, and previous arrangements have been made.

12.6 Benefits Upon Termination

- All benefits cease as of midnight on the date of termination, except for Medical, Dental, and Vision, which continue until the last day of the month in which you receive a paycheck.
- You are encouraged to contact Human Resources with any specific questions about benefits continuation and related issues.

12.7 Exit Interviews

You are encouraged to schedule an exit interview with your Allwyn supervisor within the last week of your employment. Exit Interviews are an important part of Allwyn's "continuous improvement" philosophy. We appreciate your cooperation and assistance with this process prior to leaving Allwyn. This exit interview can help resolve any questions that you have about the status of benefits after leaving employment with Allwyn.

12.8 Employment Verification

A prospective employer or vendor may ask Allwyn to verify certain aspects of (or supply information regarding) your employment with Allwyn. An Employment Verification form provides your authorization and consent to Allwyn to respond to such requests and to supply requested information. By signing this acknowledgement form, you expressly waive the right to review the reference information provided. Only the Human Resources and the President or CEO are able to verify employment. All inquiries must be directed to Human Resources in writing.

Requests for information about former employees are handled by Human Resources, President or CEO. The only information that will be provided in response to any request by a prospective employer will be verification of employment dates, confirmation of salary, job title(s), and if eligible for rehire.

Employment Handbook Acknowledgement Form

I acknowledge that I have received either a printed copy of Allwyn Corporation Inc., Inc. Employment Handbook or have access to the document electronically. I acknowledge that I have read and understand the handbook and that I will comply with the policies and practices set forth in the handbook. I will ask my supervisor or Human Resources for clarification of any of the handbook information that I do not understand.

I understand that the Employment Handbook and any other written or oral communications regarding the relationship between Allwyn and me are presented for information and reference only and do not create an employment contract, either express or implied.

I understand that we may end our employment relationship at any time, with or without cause, and for any reason or for no reason. I also understand Allwyn may change the handbook at any time, without prior notice to me, and that while I will be notified of future changes, my compliance with the policies and practices set forth in the handbook are based on this acknowledgement, and that Allwyn may or may not request that I sign additional acknowledgements. I will notify Allwyn's Human Resources promptly if I am unable to comply with any future changes in policies or practices.

Signature of Employee

Signature of Management Representative

Employee Name (please print)

Management Representative (please print)

Date

Date

Policy Manual Updates

Date	Section	Changes
10/18/2018	All sections	New handbook created
04/01/2019	All sections	Revised and revamped all policies
05/28/2019	Introduction and Preface	Added Client Policies section
06/19/2019	PTO, Pg. 26	Added additional states of compliance for sick leave
08/27/2019	All section	Inserted policy numbers
08/27/2019	3.9 Non-disclosure and Non-compete policy	Added new policy
8/27/2019	11.3 Data encryption policy	Added new policy