



Employee Guidebook

November 2016

ABOUT THIS GUIDEBOOK / DISCLAIMER

We prepared this guidebook to assist you in finding the answers to many questions that you may have regarding your employment with Comstock Protective Services (also referred to in this Guidebook as the “Firm.” Please take the necessary time to read it.

We do not expect this guidebook to answer all of your questions. The Office Manager will also be a major source of information.

Neither this guidebook nor any other verbal or written communication by a management representative, is, nor should it be considered to be, an agreement, contract of employment, express or implied, or a promise of treatment in any particular manner in any given situation nor does it confer any contractual rights whatsoever. Comstock Protective Services adheres to the policy of “employment at will,” which permits the Firm or the employee to terminate the employment relationship at any time, for any reason, with or without cause or notice.

No Firm representative other than the Director may modify at-will status and/or provide any special arrangement concerning terms or conditions of employment in an individual case or generally and any such modification must be in a signed writing.

Many matters covered by this guidebook, such as benefit plan descriptions, are also described in separate Firm documents. These Firm documents are always controlling over any statement made in this guidebook or by any member of management.

This guidebook states only general Firm guidelines. The Firm may, at any time, in its sole discretion, modify or vary from anything stated in this guidebook, with or without notice, except for the rights of the parties to terminate employment at will, which may only be modified by an express written agreement signed by the employee and the Director.

This guidebook supersedes all prior guidebooks.

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Section 1 - Governing Principles of Employment

1-1. Welcome Statement

For those of you who are commencing employment with Harry W. Dixon, dba Comstock Protective Services, let me extend a warm and sincere welcome. We hope you will enjoy your work here. We are glad to have you with us.

For those of you who have been with us, thank you for your past and continued service.

I extend to you my personal best wishes for your success and happiness here at Comstock Protective Services. We understand that it is our employees who provide the services that our customers rely upon, and who will grow and enable us to create new opportunities in the years to come.

Harry W. Dixon, Director of Services

1-2. Equal Employment Opportunity

Comstock Protective Services is an Equal Opportunity Employer that does not discriminate on the basis of actual or perceived race, color, religion, gender, sexual orientation, gender identity or expression, national origin, age, disability, medical condition, pregnancy, genetic information, marital status, amnesty, or status as a covered veteran or any other characteristic protected by applicable federal, state or local laws. Our management team is dedicated to this policy with respect to recruitment, hiring, placement, promotion, transfer, training, compensation, benefits, employee activities and any other general treatment during employment.

The Firm will endeavor to make a reasonable accommodation to the known physical or mental limitations of qualified employees with disabilities unless the accommodation would impose an undue hardship on the operation of our business. If you need assistance to perform your job duties because of a physical or mental condition, please let the Director know.

The Firm will endeavor to make a good faith effort to accommodate the sincere religious beliefs of its employees to the extent such accommodation does not pose an undue hardship on the Firm's operations. If you wish to request such an accommodation, please speak to the Director.

Any employees with questions or concerns about equal employment opportunities in the workplace are encouraged to bring these issues to the attention of the Director. The Firm will not allow any form of retaliation against individuals who raise issues of equal employment opportunity. To ensure our workplace is free of artificial barriers, violation of this policy may lead to discipline, up to and including discharge. All employees must cooperate with all investigations.

1-3. Employment At-Will

Employment with Comstock Protective Services is on an “at-will” basis. Employment at-will may be terminated at the will of either Comstock Protective Services or the employee. Employment may be terminated with or without cause, and with or without notice, at any time by you or the Firm. Terms and conditions of employment with the Firm may be modified at the sole discretion of the Firm with or without cause and with or without notice unless there is a properly executed written agreement to the contrary.

No one other than the Director of Services has the authority to create an employment relationship other than on an “at-will” basis, and may only do so in writing unless the Firm has entered into a properly executed written agreement to the contrary.

No implied contract concerning any employment-based decision or terms and conditions of employment can be established by any other statement, conduct, policy, or practice. Examples of the types of terms and conditions of employment that are within the sole discretion of the Firm include, but are not limited to, the following: promotions, demotions, transfers, hiring and discharge decisions, compensation, benefits, qualifications, disciplines, layoffs or recalls, rules, hours and schedules, work assignments, job duties and responsibilities, production standards, subcontracting, reductions, cessation or expansion of operations (sale, relocation, merger or consolidation of operations), determinations concerning the use of equipment, methods or facilities, or any other terms and conditions that the Firm may determine to be necessary for the safe, efficient, and economic operation of its business.

1-4. Individuals with Disabilities

The Americans with Disabilities Act (ADA) and the Americans with Disabilities Amendments Act (ADAAA), are federal laws which, in conjunction with state law, prohibit employers from discriminating against applicants and individuals with disabilities and, when needed, to provide reasonable accommodations to applicants and employees who are qualified for a job, with or without reasonable accommodations, so that they may perform the essential job duties of the position.

It is the policy of Comstock Protective Services to comply with all federal and state laws concerning the employment of persons with disabilities and act in accordance with regulations and guidance issued by the Equal Employment Opportunity Commission (EEOC). Furthermore, it is our Firm policy not to discriminate against qualified individuals with disabilities in regard to recruitment, hiring, placement, promotion, transfer, training, compensation, benefits, employee activities and any other general treatment during employment.

The Firm will engage in an interactive process to determine if we can reasonably accommodate qualified individuals with a disability so they can perform the essential functions of a job unless doing so is an undue hardship or causes a direct threat to workplace safety. Contact the Director with any questions or requests for accommodation.

Terms used in the policy

As used in this ADA policy, the following terms have the indicated meaning:

Disability means a physical or mental impairment that substantially limits one or more major life activities of the individual, a record of such an impairment or being regarded as having such an impairment.

Major life activities include the following, but are not limited to: caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating and working.

The ADAAA also includes the term “**major bodily functions**,” which may include physical or mental impairment such as any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more body systems, such as neurological, musculoskeletal, special sense organs, respiratory (including speech organs), cardiovascular, reproductive, digestive, genitourinary, immune, circulatory, hemic, lymphatic, skin and endocrine. Also covered are any mental or psychological disorders, such as intellectual disability (formerly termed mental retardation), organic brain syndrome, emotional or mental illness, and specific learning disabilities.

Substantially limiting: In accordance with the ADAAA final regulations, the determination of whether an impairment substantially limits a major life activity requires an individualized assessment. Some examples of these types of impairments may include, but are not limited to, epilepsy, hypertension, asthma, diabetes, major depressive disorder, bipolar disorder and schizophrenia. An impairment such as cancer that is in remission but that may possibly return in a substantially limiting form may also be considered a disability under EEOC final ADAAA regulations.

Direct threat means a significant risk to the health, safety or well-being of individuals with disabilities or others when this risk cannot be eliminated by reasonable accommodation.

Qualified individual means an individual who, with or without reasonable accommodation, can perform the essential functions of the employment position that such individual holds or desires.

Reasonable accommodation includes any changes to the work environment. For example, a reasonable accommodation may include, making existing facilities readily accessible to and usable by individuals with disabilities, job restructuring, part-time or modified work schedules, a leave of absence, telecommuting, reassignment to a vacant position, acquisition or modification of equipment or devices, appropriate adjustment or modifications of examinations, training materials or policies, the provision of qualified readers or interpreters, and other similar accommodations for individuals with disabilities.

Essential functions of the job refer to those job activities that are determined by the Firm to be essential or core to performing the job; these functions cannot be modified.

The definitions and examples provided in the above terms are not meant to be all-inclusive and should not be construed as such. They are not the only conditions that are considered to be disabilities, impairments or reasonable accommodations covered by the ADA/ADAAA policy.

Management is responsible for implementing this policy, including resolution of reasonable accommodation requests; the Director may be contacted with any questions.

1-5. Verifications of Employment

Any request for information on past or present employees must be directed to the Office Manager. Generally, the Office Manager will respond in writing to those verifications of employment inquiries that are submitted in writing and that have the authorization to do so from the current/past employee. Responses to such inquiries will confirm only dates of employment, wage rates (only when request requires such information), and position(s) held as applicable.

1-6. Prevention of Sexual and Other Unlawful Harassment

Comstock Protective Services strives to create and maintain a work environment in which people are treated with dignity, decency and respect. The environment of the workplace should be characterized by mutual trust and the absence of intimidation, oppression and exploitation. All employees should be able to work in an environment free of discrimination, and free of any form of harassment, based on actual or perceived race, color, religion, gender, sexual orientation, gender identity or expression, national origin, age, disability, medical condition, pregnancy, genetic information, marital status, amnesty, or status as a covered veteran or any other characteristic protected by applicable federal, state or local laws. Comstock Protective Services will not tolerate unlawful discrimination or harassment of any kind in the workplace. All employees, regardless of their position, are covered by and are expected to comply with this policy, and to take appropriate measures to ensure that prohibited conduct does not occur. Appropriate disciplinary action will be taken against any employee who violates this policy. Based upon the seriousness of the offense, disciplinary action may include verbal or written reprimand, suspension, and/or termination of employment.

WORKPLACE HARASSMENT:

Workplace harassment, including sexual harassment, is prohibited. This policy prohibits harassment of any kind, and appropriate action will be taken to address any violations of this policy.

Examples of workplace harassment could include:

Verbal: Comments which are not flattering regarding a person's race, color, religion, gender, sexual orientation, gender identity or expression, national origin, age, disability, medical condition, pregnancy, genetic information, marital status, amnesty, or status as a covered

veteran or any other characteristic protected by applicable federal, state or local laws; epithets, slurs, or negative stereotyping. Non-verbal: Distribution, display or discussion of any written or graphic material that ridicules, denigrates, insults, belittles, or shows hostility or aversion toward an individual or group because of actual or perceived race, color, religion, gender, sexual orientation, gender identity or expression, national origin, age, disability, medical condition, pregnancy, genetic information, marital status, amnesty, or status as a covered veteran or any other characteristic protected by applicable federal, state or local laws.

Please note: the above list is not all inclusive of the possible examples of prohibited conduct.

SEXUAL HARASSMENT:

No employee – either male or female – should be subject to unwelcome verbal or physical conduct that is sexual in nature or that shows hostility to the employee because of the employee’s gender. Sexual harassment does not refer to occasional compliments of socially acceptable nature. It refers to behavior that is not welcome, that is personally offensive, that debilitates morale, and that, therefore, interferes with work effectiveness. Comstock Protective Services strictly prohibits sexual harassment during work, during business involving the Firm (including while off property), or while on Firm property, by any employee (including supervisors and managers) or by any non-employee (including customers, visitors, vendors and independent contractors).

Sexual harassment is prohibited by law and by this policy and may include the following conduct: Unwelcome verbal or physical conduct of sexual nature when submission to the conduct is made either an explicit or implicit term condition of employment (such as promotion, training, timekeeping, overtime assignments, leaves of absence); or unwelcome verbal or physical conduct of a sexual nature when submission to or rejection of the conduct is used as a basis for making employment decisions; or unwelcome verbal or physical conduct of a sexual nature when the conduct has the purpose or effect of substantially interfering with an individual’s work performance, or creating an intimidating, hostile, or offensive work environment; or unwelcome verbal or physical sexual conduct that denigrates or shows hostility toward a person because of his or her gender when the conduct has the purpose or effect of substantially interfering with an individual’s work performance, or creating an intimidating, hostile, or offensive work environment.

Examples of prohibited sexual harassment could include:

While it is not easy to define precisely what types of conduct could constitute sexual harassment, examples of prohibited behavior include: unwelcome sexual advances, requests for sexual favors, obscene gestures, displaying sexually graphic magazines, calendars or posters, sending sexually explicit e-mails, text messages and other verbal or physical conduct of a sexual nature, such as uninvited touching of a sexual nature or sexually related comments. Depending upon the circumstances, improper conduct also can include sexual joking, vulgar or offensive conversation or jokes, commenting about an employee's physical appearance, conversation about your own or someone else's sex life, or teasing or other conduct directed toward a person because of his or her gender which is sufficiently severe or pervasive to create an unprofessional and hostile working environment.

Please note: the above list is not all inclusive of the possible examples of prohibited conduct.

MANAGEMENT RESPONSIBILITY:

While all employees are responsible for compliance with this policy, management at all levels of the Firm is particularly responsible for preventing harassment of any kind in the workplace. This responsibility includes immediately reporting conduct by anyone, whether a co-worker, supervisor, or non-employee, that may constitute any harassment, even if the conduct was sanctioned and regardless of how awareness of conduct was gained.

REPORTING PROCEDURE

EMPLOYEES

An employee who believes that he or she has been subjected to harassment of any kind by anyone is encouraged to promptly tell the person that the conduct is unwelcome and ask the person to stop the conduct. A person who receives such a request must immediately comply with it and must not retaliate against the employee for rejecting the conduct.

Complaints of workplace harassment should be brought to the attention of any of the following: (1) your immediate supervisor, (2) the Director, or (3) The Human Resource Connection Ltd., our third party human resource vendor.

If you, the employee, feels uncomfortable about discussing the complaint with your immediate supervisor or one of the above officials, the employee should feel free to bypass the supervisor or official and take the complaint to any other supervisor or one of the other listed officials.

SUPERVISORS

After receiving any employee's complaint of harassment, the supervisor will immediately contact any of the officers listed above.

If a supervisor has not received a complaint but suspects that conduct might constitute harassment, the supervisor will immediately contact any of the officials listed above, regardless of how the supervisor became aware of the conduct. Even if the suspected harassment was sanctioned or involves persons who work in a department other than the supervisor's, the supervisor will report it to the appropriate person.

INVESTIGATION AND RESOLUTION

After notification of the employee's complaint, an investigation by one of the above listed officials will immediately be initiated to gather all facts about the complaint. After the investigation has been completed, a determination will be made by appropriate management regarding the resolution of the case. If warranted, disciplinary action up to and including

discharge may be imposed. Other appropriate actions will be taken to correct problems caused by the conduct.

CONFIDENTIALITY

All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed.

RETALIATION

This policy also prohibits retaliation against employees who bring harassment charges or assist in investigating charges. Retaliation in violation of this policy may result in disciplinary action up to and including discharge. Any employee bringing a harassment complaint or assisting in the investigation of such a complaint will not be adversely affected in terms and conditions of employment, nor discriminated against or discharged because of the complaint.

1-7. Adverse Policy Impact

The Firm has implemented numerous policies that are designed to achieve important business objectives. We recognize, however, that an otherwise legitimate workplace policy can have unintended consequences to individuals in a particular group or class. If you feel that one of our policies adversely impacts you due to your unique circumstances (e.g. your membership in one of the “protected classes”), you may seek accommodation regarding such policy. The procedure to seek this accommodation is as follows: Deliver to your supervisor (or your supervisor’s supervisor) a memorandum, in writing, which identifies (1) the policy at issue; (2) the reason why the policy, as it applies to you, creates an adverse impact on you; and (3) the accommodation that you request to avoid this adverse impact.

Examples of “protected classes” include, but may not be limited to, actual or perceived race, color, religion, gender, sexual orientation, gender identity or expression, national origin, age, disability, medical condition, pregnancy, genetic information, marital status, amnesty, or status as a covered veteran or any other characteristic protected by applicable federal, state or local laws.

1-8. Drug and Alcohol-Free Workplace

Comstock Protective Services is committed to an alcohol and drug free workplace. Please see Comstock Protective Services’ copy of our separate comprehensive “Drug and Alcohol Free Workplace policy program” for a review of the requirements. There may be circumstances when alcohol is necessary in an investigation or the conduct of authorized company business. Use under such circumstances may only be authorized by the Director.

1-9. Open Door / Complaint Resolution

Comstock Protective Services is committed to providing the best possible working conditions for

its employees. Part of this commitment is encouraging an open and frank atmosphere in which any problem, complaint, suggestion, or question receives a timely response from Comstock Protective Services supervisors and management.

Comstock Protective Services strives to ensure fair and honest treatment of all employees. Supervisors, managers, and employees are expected to treat each other with mutual respect. Employees are encouraged to offer positive and constructive criticism.

If employees disagree with established rules of conduct, policies, or practices, they may express their concern with their supervisor or manager. If the employee is not comfortable going directly to their supervisor or manager, they may present their concern to the Director.

No employee will be penalized, formally or informally, for voicing a complaint with Comstock Protective Services in a reasonable, business-like manner.

The supervisor or manager receiving the complaint will document the concern or problem and make any necessary response. If the employee feels the problem was not resolved appropriately, the employee may then escalate the concern or problem to the Director.

The Director will review and consider the concern or problem and will inform the employee of the decision with a written response to be included in the employee's file. The Director has full authority to make any adjustment deemed appropriate to resolve the problem. This decision is considered final.

Comstock Protective Services does not tolerate any form of retaliation against employees availing themselves of this procedure. This procedure is not required to be utilized by Comstock Protective Services and must not be construed as preventing, limiting or delaying Comstock Protective Services from taking disciplinary action against any individual, up to and including discharge, in circumstances where Comstock Protective Services deems disciplinary action is appropriate.

Not every problem can be resolved to everyone's total satisfaction, but only through understanding and discussion of mutual problems can employees and management develop confidence in each other. This confidence is important to the operation of an efficient and harmonious work environment.

Section 2 - Operational Policies

2-1. Employee Classifications

For purposes of this guidebook, all employees fall within one of the classifications below.

Full-Time / Regular Employees - Employees who regularly work at least forty (40) hours per week who were not hired on a short-term basis. Generally, full-time employees are eligible for Comstock Protective Services' benefit package subject to the terms, conditions, and limitations of each benefit program. Employees who work at least thirty (30) hours per week are eligible for health benefits provided by Comstock Protective Services as required by the Affordable Care Act.

Part-Time / Regular Employees - Employees who regularly work fewer than forty (40) hours per week who were not hired on a short-term basis. While part-time employees do receive all legally mandated benefits (such as Social Security and Workers' Compensation insurance), they are ineligible for some of Comstock Protective Services' other benefit programs.

Short-Term / Project Based / Seasonal Employees - Employees who were hired for a specific short-term project, or on a short-term freelance, per diem or to temporarily supplement the workforce, or to assist in the completion of a specific project. Employment assignments in this category are of a limited duration. Employment beyond any initially stated period does not in any way imply a change in employment status. Project-based employees retain that status unless and until notified of a change. While project-based employees receive all legally mandated benefits (such as Workers' Compensation insurance and Social Security), they are ineligible for all of Comstock Protective Services' other benefit programs.

In addition to the above classifications, employees are categorized as either "**exempt**" or "**non-exempt**" for purposes of federal and state wage and hour laws. Employees classified as exempt do not receive overtime pay; they generally receive the same weekly salary regardless of hours worked. Such salary may be paid less frequently than weekly. Employees classified as non-exempt are entitled to overtime pay over forty (40) hours in a week or over eight (8) hours in a day if they earn less than one and one-half (1.5) times the minimum wage rate. You will be informed of your classifications upon hire and informed of any subsequent changes to your classifications.

2-2. Your Employment Records

In order to obtain your position, you provided us with personal information, such as your address and telephone number. This information is contained in your employment file.

Please keep your information up to date by notifying the Office Manager of any changes. Also, please inform the Office Manager of any specialized training or skills you may acquire in the future, as well as any changes to any required visas. Unreported changes of address, marital

status, etc. may affect your withholding tax and benefit coverage. Further, an "out of date" emergency contact or an inability to reach you in a crisis could cause a severe health or safety risk or other significant problem. Employees must report any change to the Office manager within 24 hours of the change.

2-3. Working Hours and Schedule

Comstock Protective Services is normally open for business between 9:00 am to 5:00 pm, Monday through Friday. However, the nature of our business is that employees may be assigned work schedules outside of these hours. You will be assigned a work schedule and you will be expected to begin and end work according to the schedule. To accommodate the needs of our business, at some point we may need to change individual work schedules on either a short-term or long-term basis.

Employees will be provided with at least one (1) thirty (30) minute meal period and two (2), ten (10) minute rest periods within an eight (8) hour day, as required by law and/or Firm policy. Your supervisor will provide further details.

2-4. Timekeeping Procedures

Employees must record their actual time worked for payroll and benefit purposes. Non-exempt employees must record the time work begins and ends, as well as the beginning and ending time of any departure from work for any non-work-related reason, including meal breaks. Management will provide the appropriate tool to record all hours worked.

Punching or filling out another employee's time record, allowing another employee to punch or fill out your time record, or altering a time record, is considered a falsification of Firm documents and may result in disciplinary action, up to and including discharge. If any manager or employee instructs you to: 1) incorrectly or falsely under- or over-report your hours worked; 2) alter another employee's time records to inaccurately or falsely report that employee's hours worked; or, 3) conceal any falsification of time records, do not do so, instead report it immediately to the Office Manager.

Exempt employees are required to record their daily work attendance and report full days of absence from work for reasons such as leaves of absence, sick leave or personal business.

Non-exempt employees may not start work until their scheduled starting time.

2-5. Overtime

Like most successful companies, we may experience periods of higher than normal activity. During these busy periods, additional work is required from all of us. Your supervisor is responsible for monitoring business activity and requesting overtime work if it is necessary. Effort will be made to provide you with adequate advance notice in such situations.

Any non-exempt employee who works overtime will be compensated at the rate of one and one-half times (1.5) his/her normal hourly wage for all time worked in excess of forty (40) hours each week, or over eight (8) hours in a day if the employee earns less than one and one-half (1.5) times the Nevada minimum wage, unless otherwise required by law.

Employees may work overtime only with prior management authorization.

For purposes of calculating overtime for non-exempt employees, the workweek begins at 12:00 a.m. on Monday and ends 168 hours later at 11:59 p.m. on the following Sunday.

2-6. Travel Time for Non-Exempt Employees

Overnight, Out-of-Town Trips

Non-exempt employees will be compensated for time spent traveling (except for meal periods) during their normal working hours, on days they are scheduled to work and on unscheduled work days (such as weekends). Non-exempt employees also will be paid for any time spent performing job duties during otherwise non-compensable travel time; however, such work should be limited absent advance management authorization.

Out-of-Town Trips for One Day

Non-exempt employees who travel out of town for a one (1) day assignment will be paid for all travel time, except for, among other things: (i) time spent traveling between the employee's home and the local railroad, bus or plane terminal; and (ii) meal periods.

Local Travel

Non-exempt employees will be compensated for time spent traveling from one job site to another job site during a workday, including any mileage reimbursement that is calculated at the current rate as designated by the IRS. The trip home, however, is non-compensable when an employee goes directly home from his/her final job site, unless it is much longer than his/her regular commute home from the regular worksite. In such case, the portion of the trip home in excess of the regular commute is compensable.

Commuting Time

Under the Portal to Portal Act, travel from home to work and from work to home is generally non-compensable. However, if a non-exempt employee regularly reports to a worksite near his/her home, but is required to report to a worksite farther away than the regular worksite, the additional time spent traveling is compensable.

If compensable travel time results in more than forty (40) hours worked by a non-exempt employee, the employee will be compensated at an overtime rate of one and one-half (1.5) times the regular rate.

To the extent that applicable state law provides greater benefits, state law applies.

2-7. Safe Harbor Policy for Exempt Employees

It is our policy and practice to accurately compensate employees and to do so in compliance with all applicable state and federal laws. To ensure that you are paid properly and that no improper deductions are made, you must review your pay stubs promptly to identify and report all errors.

If you are classified as an exempt salaried employee, you will receive a salary which is intended to compensate you for all hours you may work for the Firm. This salary will be established at the time of hire or when you become classified as an exempt employee. While it may be subject to review and modification from time to time, such as during salary review times, the salary will be a predetermined amount that will not be subject to deductions for variations in the quantity or quality of the work you perform.

Under federal and state law, your salary is subject to certain deductions. For example, unless state law requires otherwise, your salary can be reduced for the following reasons:

- Full-day absences for personal reasons
- Full-day absences for sickness or disability
- Full-day disciplinary suspensions for infractions of our written policies and procedures
- To offset amounts received as payment for jury and witness fees or military pay
- The first or last week of employment in the event you work less than a full week
- Any full work week in which you do not perform any work

Your salary may also be reduced for certain types of deductions such as your portion of health, dental or life insurance premiums; state, federal or local taxes; Social Security; or voluntary contributions to a 401(k) or pension plan.

In any work week in which you performed any work, your salary will not be reduced for any of the following reasons:

- Partial day absences for personal reasons, sickness or disability
- Your absence on a day because your employer has decided to close a facility on a scheduled work day
- Absences for jury duty, attendance as a witness, or military leave in any week in which you have performed any work subject to any offsets as set forth above).
- Any other deductions prohibited by state or federal law

However, unless state law provides otherwise, deductions may be made to your accrued leave for full- or partial-day absences for personal reasons, sickness or disability.

If you believe you have been subject to any improper deductions, you should immediately report the matter to your supervisor. If your supervisor is unavailable or if you believe it would be inappropriate to contact that person (or if you have not received a prompt and fully acceptable reply), you should immediately contact the Office Manager or any other supervisor in the Firm with whom you feel comfortable.

2-8. Your Paycheck

You will be paid bi-weekly (26 pay periods), for all the time you have worked during the past pay period. Employees are paid every other Friday.

Your payroll stub itemizes deductions made from your gross earnings. By law, the Firm is required to make deductions for Social Security, federal income tax and any other appropriate taxes. These required deductions also may include any court-ordered garnishments. Your payroll stub will also differentiate between regular pay received and overtime pay received.

If you believe there is an error in your pay, bring the matter to the attention of the Office Manager immediately so the Firm can resolve the matter quickly and amicably.

Your paycheck will be given only to you, unless you request that it be mailed, or authorize in writing another person to accept your check for you.

2-9. Business Expense Reimbursement

Employees may be reimbursed for reasonable approved expenses incurred in the course of business. These expenses must be approved by your supervisor, and may include air travel, hotels, motels, meals, cab fare, rental vehicles, or gas and car mileage for personal vehicles. All expenses incurred should be submitted to the Office Manager along with the receipts in a timely manner.

Employees are expected to exercise restraint and good judgment when incurring expenses. You should contact your supervisor in advance if you have any questions about whether an expense will be reimbursed.

2-10. Performance Reviews

Depending on your position and classification, Comstock Protective Services endeavors to review your performance on a regular basis. However, please understand that a positive performance review does not guarantee an increase in salary, a promotion, or continued employment. Compensation increases and the terms and conditions of employment, including job assignments, transfers, promotions, and demotions, are determined by and at the discretion of management.

In addition to these formal performance reviews, the Firm encourages you and your supervisor to discuss your job performance on a frequent and ongoing basis.

2-11. Access to Employee Files / Record Retention

Comstock Protective Services maintains an HR file on each employee. The HR file includes such information as the employee's job application, resume, records of training, documentation of performance appraisals, salary increases, confirmations of corrective action and other employment records.

HR files are the property of the Firm, and access to the information they contain is restricted. Generally, only supervisors and management personnel of Comstock Protective Services who have a legitimate reason to review information in a file are allowed to do so.

Employees who wish to review their own file should contact the Office Manager. With reasonable advance notice, employees may review their own HR file in Comstock Protective Services offices and in the presence of an individual appointed by the Firm to maintain the files.

2-12. Hiring of Relatives / Personal Relationships in the Workplace

A familial relationship among employees can create an actual or at least a potential conflict of interest in the employment setting, especially where one relative supervises another relative. To avoid this problem, Comstock Protective Services may refuse to hire or place a relative in a position where the potential for favoritism or conflict exists.

In other cases such as personal relationships where a conflict or the potential for conflict arises, even if there is no supervisory relationship involved, the parties may be separated by reassignment or terminated from employment, at the discretion of the Firm. Accordingly, all parties to any type of intimate personal relationship must inform management.

If two employees marry, become related, or enter into an intimate relationship, they may not remain in a reporting relationship or in positions where one individual may affect the compensation or other terms or conditions of employment of the other individual. The Firm generally will attempt to identify other available positions, but if no alternate position is available, the Firm retains the right to decide which employee will remain with the Firm.

For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

2-13. Employee Communication

Important notices and items of general interest are continually posted on our bulletin board. Make it a practice to review it frequently. This will assist you in keeping up with what is current at Comstock Protective Services.

Bulletin boards are reserved for official Firm communications on such items as:

- Internal memoranda
- Payday notice
- Workers' Compensation insurance information
- Unemployment insurance information
- State and federal mandated postings

Non-business notices may not be posted or distributed without prior authorization from the Office Manager.

All employee communication should be considered proprietary, confidential Firm Information.

2-14. Publicity / Statements to the Media

All media inquiries regarding the position of the Firm on any issues must be referred to the Director. Only the Director or his designee is authorized to make or approve public statements on behalf of the Firm. No employees, unless specifically designated by the Director, are authorized to make those statements on behalf of the Firm. Any employee wishing to write and/or publish an article, paper, or other publication on behalf of the Firm must first obtain approval from the Director.

Section 3 - Benefits

3-1. Benefits Overview

In addition to good working conditions and competitive pay, it is Comstock Protective Services' policy to provide a combination of supplemental benefits to all eligible employees. In keeping with this goal, each benefit program has been carefully devised. These benefits may include time-off benefits, such as vacations and holidays, and insurance and other plan benefits. We are constantly studying and evaluating our benefits programs and policies to better meet your present and future requirements. These policies have been developed over the years and continue to be refined to keep up with changing times and needs.

The next few pages contain a brief outline of the benefits programs Comstock Protective Services provides for you and your family. Of course, the information presented here is intended to serve only as guidelines.

The descriptions of the insurance and other plan benefits merely highlight certain aspects of the applicable plans for your general information only. The details of those plans are spelled out in the official plan documents, which are available for review upon your request from the Office Manager. Additionally, the provisions of the plans, including eligibility and benefits provisions, are summarized in the summary plan descriptions ("SPDs") for the plans (which may be revised from time to time). In the determination of benefits and all other matters under each plan, the terms of the official plan documents shall govern over the language of any descriptions of the plans, including the SPDs and this guidebook.

Further, Comstock Protective Services (including the officers and administrators who are responsible for administering the plans) retains full discretionary authority to interpret the terms of the plans, as well as full discretionary authority with regard to administrative matters arising in connection with the plans and all issues concerning benefit terms, eligibility and entitlement.

While the Firm intends to maintain these employee benefits, it reserves the absolute right to modify, amend or terminate these benefits at any time and for any reason.

If you have any questions regarding your benefits, please contact the Office Manager.

3-2. Holidays

Full-time employees will be eligible to be paid for the following holidays on the first day following ninety (90) days of employment.

New Year's Day
Memorial Day
Independence Day
Labor Day

Thanksgiving Day
Christmas Day

When holidays fall or are celebrated on a regular work day, eligible employees will receive one (1) day's pay at their regular straight-time rate. Eligible employees who are called in to work on a holiday will receive one (1) day's pay at their regular straight-time rate, and an additional one-half hourly rate as payment for the actual time they work that day.

To the extent allowed by state and federal law, unplanned absences on the work day immediately preceding and following a holiday will result in ineligibility for holiday pay. For the purpose of holiday pay, illness immediately preceding or following the holiday must be confirmed by a health care provider's note.

When a holiday falls on Saturday, it is usually observed on the preceding Friday. When a holiday falls on a Sunday, it is usually observed on the following Monday. However, the Firm may close on another day or grant a floating day off instead of closing. Holiday observances will be announced in advance.

If a holiday falls within an eligible employee's approved vacation period, the eligible employee will be paid for the holiday (at the regular straight-time rate) and the day will not be charged against the employee's vacation time.

If a holiday falls within a jury duty or bereavement leave, the eligible employee will be paid for the holiday (at the regular straight-time rate).

3-3. Lactation Breaks

The Firm will provide a reasonable amount of break time to accommodate an employee desiring to express breast milk for the employee's infant child, in accordance with and to the extent required by applicable law. The break time, if possible, must run concurrently with rest and meal periods already provided to the employee. If the break time cannot run concurrently with rest and meal periods already provided to the employee, the break time will be unpaid, subject to applicable law.

The Firm will make reasonable efforts to provide employees with the use of a room or location other than a toilet stall for the employee to express milk in private. This location may be the employee's private office, if applicable. The Firm may not be able to provide additional break time if doing so would seriously disrupt the Firm's operations, subject to applicable law. Please consult the Office Manager if you have questions regarding this policy.

Please advise management if you need break time and an area for this purpose. Employees will not be discriminated against or retaliated against for exercising their rights under this policy.

3-4. Paid Time Off

We know how hard you work and recognize the importance of providing you with time for rest and relaxation. We fully encourage you to get this rest by taking your paid time off. Time off under this policy includes extended time off, such as for a vacation, and incidental time due to sickness or to handle personal affairs.

- On the first year employment anniversary, full-time employees are granted one (1) week (40 hours) of vacation to be used in the anniversary year in which it is granted.
- At the second year employment anniversary, full-time employees are granted two (2) weeks (80 hours) to be used in the anniversary year in which it is granted.
- At the fifth year employment anniversary, full-time employees are granted three (3) weeks (120 hours) to be used in the anniversary year in which it is granted.

Unused vacation may be paid to employee at end of the anniversary year.

If you wish to use three (3) or more full days of paid time off consecutively, you must submit a request to your supervisor at least two (2) weeks in advance of your requested time off. Similar notice should be provided for planned time off of shorter duration. Every effort will be made to grant your request, consistent with our operating schedule. However, if too many people request the same period of time off, the Firm reserves the right to choose who may take time off during that period. Individuals with the longest length of service generally will be given preference.

If you will be out of work due to illness or due any other emergency for which notice could not be provided, you must call in and notify your supervisor as early as possible, but at least by the start of your workday. If you call in sick for three (3) or more consecutive days, you may be required to provide your supervisor with a health care provider's note on the day you return to work.

Unused paid time off **is not** paid out upon separation, unless otherwise required by law.

3-5. Insurance Programs

At such time when the Firm offers employee insurance benefits, full-time/part time employees may participate in the Firm's insurance programs on the first of the month following sixty (60) days of employment. Under these plans, eligible employees will receive comprehensive health and other insurance coverage for themselves and their families, as well as other benefits.

Upon becoming eligible to participate in these plans, you will receive summary plan descriptions (SPDs) describing the benefits in greater detail. Please refer to the SPDs for detailed plan information. Of course, feel free to speak to the Office Manager if you have any further questions.

3-6. Workers' Compensation

On-the-job injuries are covered by our Workers' Compensation Insurance Policy, which is provided at no cost to you. If you are injured on the job, no matter how slightly, report the incident immediately to your supervisor. Failure to follow Firm procedures may affect your ability to receive Workers' Compensation benefits.

This is solely a monetary benefit and not a leave of absence entitlement. Employees who need to miss work due to a workplace injury must also request a formal leave of absence. See the Leave of Absence sections of this guidebook for more information.

3-7. Jury Duty or Subpoenaed Court Appearance

Comstock Protective Services realizes that it is the obligation of all U.S. citizens to serve on a jury when summoned to do so. All employees will be allowed time off to perform such civic service as required by law. You are expected, however, to provide the Firm with proper notice of your request to perform jury duty and with your verification of service. You also are expected to keep management informed of the expected length of your jury duty service and to report to work for the major portion of the day if you are excused by the court. If the required absence presents a serious conflict for management, you may be asked to try to postpone your jury duty.

Any monies received for jury duty pay may be retained by the employee.

If work time remains after any day of jury selection or jury duty, you will be expected to return to work for the remainder of your work schedule.

Subject to the terms, conditions, and limitations of the applicable plans, Comstock Protective Services will continue to provide health insurance benefits (if applicable) for the full period of the approved leave. The employee must make arrangements for payment of the health insurance premium for coverage during the leave of absence prior to the start of the leave. Benefit accruals will not be suspended during the leave.

3-8. Bereavement Leave

We know the death of a family member is a time when you wish to be with the rest of your family. If you are a full-time employee and you lose a close relative, you will be allowed unpaid time off of up to three (3) days to assist in attending to your obligations and commitments. For the purposes of this policy, a close relative includes a spouse, domestic partner, child, parent, sibling or any other relation required by applicable law. Paid leave days only may be taken on regularly scheduled, consecutive workdays following the day of death. You must inform your supervisor prior to commencing bereavement leave. In administering this policy, the Firm may require verification of death.

3-9. Time Off to Vote

Comstock Protective Services encourages employees to fulfill their civic responsibilities by participating in elections. Generally, employees are able to find time to vote either before or after their regular work schedule. If employees are unable to vote in an election during their nonworking hours, Comstock Protective Services will grant paid time off to vote. The length of time off permitted is determined by the distance from the employee's place of employment to his or her polling place: one (1) hour if two (2) miles or less; two (2) hours if between two (2) and ten (10) miles; and three (3) hours if more than ten (10) miles. Employees must submit a voter's receipt on the first working day following the election to qualify for paid time off.

Employees should request time off to vote from their supervisor at least two (2) working days prior to Election Day. Advance notice is required so that the necessary time off can be scheduled at the beginning or end of the work shift, whichever provides the least disruption to the normal work schedule. Comstock Protective Services may also designate which hours an employee may take off to vote.

Section 4 - Unpaid Time Off

4-1. Personal Leave / Medical Leave

If you are ineligible for any other Firm leave of absence, Comstock Protective Services under certain circumstances, may grant you a personal/medical leave of absence without pay. A written request for a personal leave should be presented to management at least two (2) weeks before the anticipated start of the leave. If the leave is requested for medical reasons and you are not eligible for leave under the federal Family and Medical Leave Act (FMLA) or any state leave law, medical certification also must be submitted. Your request will be considered on the basis of staffing requirements and the reasons for the requested leave, as well as your performance and attendance records. Normally, a leave of absence will be granted for a period of up to thirty (30) days. However a personal leave may be extended if, prior to the end of your leave, you submit a written request for an extension to management and the request is granted. During your leave, you will not earn vacation, personal days or sick days. We will continue your health insurance coverage during your leave if you submit your share of the monthly premium payments to the Firm in a timely manner, subject to the terms of the plan documents.

When you anticipate your return to work, please notify management of your expected return date. This notification should be made at least one (1) week before the end of your leave.

Upon completion of your personal leave of absence, the Firm will attempt to return you to your original job, or to a similar position, subject to prevailing business considerations. Reinstatement, however, is not guaranteed.

Failure to advise management of your availability to return to work, failure to return to work when notified, or your continued absence from work beyond the time approved by the Firm will be considered a voluntary resignation of your employment.

4-2. Military Leave

If you are called into active military service or you enlist in the uniformed services, you will be eligible to receive an unpaid military leave of absence. To be eligible for military leave, you must provide management with advance notice/military orders of your service obligations unless you are prevented from providing such notice by military necessity or it is otherwise impossible or unreasonable for you to provide such notice. Provided your absence does not exceed applicable statutory limitations, you will retain reemployment rights and accrue seniority and benefits in accordance with applicable federal and state laws. Please ask the Office Manager for further information about your eligibility for Military Leave.

If you are required to attend yearly Reserves or National Guard duty, you can apply for an unpaid temporary military leave of absence not to exceed the number of days allowed by federal and state laws (including travel). You should give management as much advance notice of your need for military leave as possible so that we can maintain proper coverage while you are away.

Section 5 - General Standards of Conduct

5-1. Workplace Conduct

A key element to our continued success is each employee's commitment to be guided by certain standards and principles in performing his or her job. It is important that employees be guided by the following:

1. Adherence to all applicable federal, state, and local laws and regulations
2. Protection of our corporate reputation and assets (e.g. being honest with our customers, and treating them with respect, taking care to lock doors, or report suspicious behavior to help prevent theft)
3. Responsible action that avoids conflicts of interest and other situations potentially harmful to the Firm (e.g. never post confidential business planning information on a personal social media account)
4. Being ethical and honest, including providing truthful information in response to any management inquiry or investigation

The Firm considers work rules, guidelines, and work performance important responsibilities. They are essential to the proper management of our business, and ensure that employees work together effectively. When these rules and guidelines are not followed, or an employee's work performance is below Firm standards, written disciplinary warnings may be issued.

VIOLATIONS OF FIRM RULES AND GUIDELINES, OR THE EMPLOYEE'S FAILURE TO IMPROVE WORK PERFORMANCE MAY RESULT IN DISCIPLINARY ACTION, UP TO AND INCLUDING DISCHARGE. THE FIRM RESERVES THE RIGHT TO TERMINATE EMPLOYMENT WITH OR WITHOUT CAUSE AND WITH OR WITHOUT NOTICE. HOWEVER, NONE OF THESE RULES AND GUIDELINES SHALL BE CONSTRUED TO LIMIT AN EMPLOYEE'S RIGHT TO DISCUSS WORKING CONDITIONS, WAGES, BENEFITS, OR OTHER TERMS AND CONDITIONS OF EMPLOYMENT.

Examples of Prohibited Conduct are (please note: this is not an all-inclusive list of prohibited conduct):

1. Making false statements or omitting pertinent information on Firm applications, records of employment, forms or reports, or in the course of participation in Firm investigations or in responding to management inquiries.
2. Insubordination: Refusal to obey work orders of supervisors, refusal to perform job assignments, or the use of abusive or threatening language toward a supervisor or member of management, but this prohibition is not intended to limit an employee's right to discuss working conditions, wages, benefits, safety, etc.
3. Committing any act of violence, threats or intimidation, fighting, or using abusive or profane language on Firm premises, but this prohibition is not intended to limit an employee's right to discuss working conditions, wages, benefits, safety, etc.
4. Theft, unauthorized removal, or willful damage of property belonging to the Firm, Firm employees, or customers; theft of Firm resources.

5. Disregard of safety rules and practices and security regulations including horseplay, wrestling, dangerous practical jokes, or throwing objects.
6. Unauthorized operation of machinery and equipment, or operation of any machinery or equipment that you are not trained and authorized to operate.
7. Unauthorized entry or exit from Firm property at any location at any time; leaving the workplace without properly notifying your supervisor.
8. Substandard or unsatisfactory work performance.
9. Repeated absences or tardiness, including unreported absences, without authorization or unless otherwise allowed by law.
10. Gambling, in any form, on Firm premises.
11. Distribution of non-Firm written materials during working time; distribution of non-business or non-Firm literature in working areas; littering; solicitation of or by employees during working time in the workplace. Work time does not include designated breaks, meal periods, and before or after work. This prohibition is not intended to limit an employee's right to engage in efforts to change or improve working conditions, wages, benefits, etc.
12. Any and all forms of solicitation during working times. Work time does not include designated breaks, meal periods, and before or after work. Employees are further prohibited from solicitation on the Firm property in work areas where other employees are actively working. Employees may engage in solicitation only during non-working time in non-working areas such as break rooms, sidewalks, and parking lots. This prohibition is not intended to limit an employee's right to engage in efforts to change or improve working conditions, wages, benefits, etc.
13. Sleeping or deliberately loafing during working hours.
14. Smoking in non-designated areas.
15. Failure to fully cooperate with any Firm investigation as required by management.
16. Any other conduct that is prohibited by law. There is no substitute for good judgment and common sense.

This is not meant to be a total list of all work rules, but rather is illustrative of the type of conduct that will not be tolerated by the Firm. This list should be interpreted in conjunction with all other applicable federal, state, and local laws. Moreover, employees are free to discuss among themselves or with others issues relevant to their pay, benefits supervisors, safety, and other working conditions, or otherwise legally engage in activity with others in an effort to change working conditions. This statement of prohibited conduct does not alter the Firm's policy of at-will employment.

5-2. Corrective Action / Discipline

The purpose of this policy is to state Comstock Protective Services' position on administering equitable and consistent corrective action for unsatisfactory work performance or conduct in the workplace. The best corrective action measure is the one that does not have to be enforced and comes from good leadership and fair supervision at all employment levels.

Comstock Protective Services' own best interest lies in ensuring fair treatment of all employees and in making certain that corrective actions are prompt, uniform, and impartial. The major purpose of any corrective action is to correct the problem, prevent recurrence, and prepare the employee for satisfactory results in the future.

Although employment with Comstock Protective Services is based on mutual consent and both the employee and Comstock Protective Services have the right to terminate employment at will, with or without cause or advance notice, corrective action for violations of our work rules *may include the following options, at the sole discretion of Comstock Protective Services:*

- Counseling by the employee's immediate supervisor -- Initial Warning – Notifies the employee that performance or behavior must be improved.
- Written Warning – A formal notice to an employee that further corrective action will be taken unless behavior or performance improves.
- Disciplinary Suspension – Time off without pay to be used in cases of repeated or major violations of policies or work rules.
- Administrative Leave with or without pay pending possible termination/discharge – Termination of employment is used when the employee has been given the opportunity to meet performance and/or behavior standards and in management's evaluation has failed to do so. Termination of employment may be used for a first offense when the violation is so severe that no other response is appropriate.

Not all of these options need to be exhausted prior to suspension or termination of employment.

While it is impossible to list every type of work performance deficiency or behavior that may be deemed a serious offense, the Workplace Conduct policy includes examples of problems that may result in disciplinary action up to and including discharge. However, the problems listed are not all necessarily serious offenses, but may be examples of unsatisfactory conduct that will trigger corrective action.

5-3. Respectful Workplace

Comstock Protective Services employees are expected to maintain a civil working environment that ensures respect, dignity, equity and cooperation for all employees, customers and visitors. Opposing behavior will be considered unprofessional, disruptive to the workplace, and in conflict with Comstock Protective Services expectations. Conduct deemed to be

unprofessional and/or disruptive will be reviewed on a case by case basis and may result in corrective action up to and including discharge.

Examples of unprofessional conduct include:

- Yelling
- Swearing
- Refusing to communicate
- Rude speech
- Condescending communication
- Refusing to meet with supervisor
- Ignoring
- Name calling
- Bullying
- Gossip
- Refusing to meet with a subordinate employee

Questions or concerns regarding inappropriate actions may be referred to the Director.

5-4. Punctuality and Attendance

You were hired to perform an important function at Comstock Protective Services. As with any group effort, operating effectively takes cooperation and commitment from everyone. Therefore, your attendance and punctuality are very important. Unnecessary absences and lateness are expensive, disruptive and place an unfair burden on your fellow employees and your supervisors. We expect excellent attendance from each of you. Excessive absenteeism or tardiness may result in disciplinary action up to and including discharge.

We do recognize, however, that there are times when absences and tardiness cannot be avoided. In such cases, you are expected to notify your supervisor as early as possible, but no later than two (2) hours before the start of your scheduled work time. Asking another employee, friend or relative to give this notice is improper and may result in disciplinary action up to and including discharge. Please call, stating the nature of your absence and its expected duration, every day that you are absent.

Unreported absences of two (2) consecutive work days generally will be considered a voluntary resignation of your employment with the Firm, unless it is determined that the employee was absent due to an emergency and unable to notify the Firm.

5-5. Use of Communication and Computer Systems

Comstock Protective Services' communication and computer systems are intended for business purposes only.

This includes voice mail, e-mail and Internet systems. Users have no legitimate expectation of privacy in regard to their use of the systems.

Comstock Protective Services may access its voice mail and e-mail systems and obtain the communications within the systems, including past voice mail and e-mail messages, without notice to users of the system, in the ordinary course of business when the Firm deems it appropriate to do so. The reasons for which the Firm may obtain such access include, but are not limited to: maintaining the system; preventing or investigating allegations of system abuse or misuse; assuring compliance with software copyright laws; complying with legal and regulatory requests for information; and ensuring that Firm operations continue appropriately during an employee's absence.

Further, Comstock Protective Services may review Internet usage to ensure that such use with Firm property, or communications sent via the Internet with Firm property, are for business purposes only. The reasons for which the Firm may review employees' use of the Internet with Firm property include, but are not limited to: maintaining the system; preventing or investigating allegations of system abuse or misuse; assuring compliance with software copyright laws; complying with legal and regulatory requests for information; and ensuring that Firm operations continue appropriately during an employee's absence.

The Firm may store electronic communications for a period of time after the communication is created. From time to time, copies of communications may be deleted.

The Firm's policies prohibiting harassment, in their entirety, apply to the use of the Firm's communication and computer systems. No one may use any communication or computer system in a manner that may be construed by others as harassing or offensive based on actual or perceived race, color, religion, gender, sexual orientation, gender identity or expression, national origin, age, disability, medical condition, pregnancy, genetic information, marital status, amnesty, or status as a covered veteran or any other characteristic protected by applicable federal, state or local laws.

Since the Firm's communication and computer systems are intended for business use, these systems may not be used to solicit for religious or political causes, outside organizations or other personal matters unrelated to Firm business.

Further, since the Firm's communication and computer systems are intended for business use, all employees, upon request, must inform management of any private access codes or passwords. Unauthorized duplication of copyrighted computer software violates the law and is strictly prohibited.

No employee may access, or attempt to obtain access to, another employee's computer systems without appropriate authorization.

Violators of this policy may be subject to disciplinary action, up to and including discharge.

5-6. Use of Social Media

Comstock Protective Services recognizes the importance of the Internet in shaping public thinking about our Firm and our current and potential products, employees, partners, and customers. Comstock Protective Services also recognizes the importance of our employees joining in and helping shape industry conversation and direction through blogging and interaction in social media. We are committed to supporting your right to interact knowledgeably and socially in the blogosphere and on the Internet through blogging and interaction in social media.

Consequently, these guidelines in this blogging and social media policy will help you make appropriate decisions about your work-related blogging and the contents of your blogs, personal websites, postings on wikis and other interactive sites, postings on video or picture sharing sites, or in the comments that you make online on blogs, elsewhere on the public Internet, and in responding to comments from posters either publicly or via email. Our internal Internet and Email Policy remains in effect in our workplace.

These guidelines will help you open up a respectful, knowledgeable interaction with people on the Internet. They also protect the privacy, confidentiality, and interests of Comstock Protective Services and our current and potential products, employees, partners, customers, and competitors.

Note that these policies and guidelines apply only to work-related sites and issues and are not meant to infringe 'upon your personal interaction or commentary online.'

Guidelines for Interaction on the Internet

If you are developing a website or writing a blog that will mention Comstock Protective Services, and / or our current and potential products, employees, partners, customers, and competitors, identify that you are an employee of Comstock Protective Services and that the views expressed on the blog or website are yours alone and do not represent the views of the Firm. Unless given permission by the Director, you are not authorized to speak on behalf of the Firm, or to represent that you do so.

If you are developing a site or writing a blog that will mention the Firm and / or current and potential clients, employees, partners, customers, and competitors, as a courtesy to the Firm, please let your supervisor know that you are writing them. Your supervisor may choose to visit from time to time to understand your point of view.

Confidential Information

You may not share information that is confidential and proprietary about the Firm. This includes information about trademarks, upcoming strategies, sales, finances, number or information of clients, number or information of employees, Firm strategy, and any other information that has not been publicly released by the Firm. These are given as examples only and do not cover the range of what the Firm considers confidential and proprietary. If you have any question about

whether information has been released publicly or doubts of any kind, speak with your supervisor before releasing information that could potentially harm the Firm, or current and potential clients, employees, partners, and customers. You may also want to be aware of the points made in the non-disclosure agreement you signed when you joined the Firm.

Comstock Protective Services logo and trademarks may not be used without explicit permission in writing from the Firm. This is to prevent the appearance that you speak for or represent the Firm officially.

Respect and Privacy Rights

Speak respectfully about the Firm and current and potential employees, customers, partners, and competitors. Do not engage in name calling or behavior that will reflect negatively on Comstock Protective Services' reputation. Note that the use of copyrighted materials, unfounded or derogatory statements, or misrepresentation is not viewed favorably by Comstock Protective Services and can result in disciplinary action up to and including discharge.

Comstock Protective Services encourages you to write knowledgeably, accurately, and using appropriate professionalism. Despite disclaimers, your Internet interaction can result in members of the public forming opinions about Comstock Protective Services and its employees, partners, and products. Honor the privacy rights of current employees by seeking their permission before writing about or displaying internal Firm happenings that might be considered to be a breach of their privacy and confidentiality.

Competition

You may not sell any product or service that would compete with any of Comstock Protective Services' products or services without permission in writing from the Director. This includes, but is not limited to training, books, products, consulting and freelance writing. If in doubt, talk with the Director.

Your Legal Liability

Recognize that you are legally liable for anything you write or present online. Employees can be disciplined by the Firm for commentary, content, or images that are defamatory, pornographic, proprietary, harassing, libelous, or that can create a hostile work environment. You can also be sued by Firm employees, competitors, and any individual or Firm that views your commentary, content, or images as defamatory, pornographic, proprietary, harassing, libelous or creating a hostile work environment.

Media Contact

Media contacts about the Firm and current and potential clients, employees, partners, customers, and competitors should be referred for coordination and guidance to the Director.

This does not specifically include your opinions, writing, and interviews on topics aside from the Firm and current and potential products, employees, partners, customers, and competitors.

5-7. Personal and Firm-Provided Portable Communication Devices

Firm-provided portable communication devices (PCDs), including cell phones and personal digital assistants, should be used primarily for business purposes. Employees have no reasonable expectation of privacy in regard to the use of such devices, and all use is subject to monitoring, to the maximum extent permitted by applicable law. This includes as permitted the right to monitor personal communications as necessary.

Some employees may be authorized to use their own PCD for business purposes. These employees should work with the IT department to configure their PCD for business use. Communications sent via a personal PCD also may be subject to monitoring if sent through the Firm's networks and the PCD must be provided for inspection and review upon request.

All conversations, text messages and e-mails must be professional. When sending a text message or using a PCD for business purposes, whether it is a Firm-provided or personal device, employees must comply with applicable Firm guidelines, including policies on harassment/sexual harassment, discrimination, conduct, confidentiality, equipment use and operation of vehicles. Using a Firm-issued PCD to send or receive personal text messages is prohibited at all times and personal use during working hours should be limited to emergency situations.

If an employee who uses a personal PCD for business resigns or is terminated, the employee will be required to submit the device to the IT department for resetting on or before his or her last day of work. At that time, the IT department will reset and remove all information from the device, including but not limited to, Firm information and personal data (such as contacts, e-mails and photographs). The IT department will make efforts to provide employees with the personal data in another form (e.g., on a disk) to the extent practicable; however, the employee may lose some or all personal data saved on the device.

Employees may not use their personal PCD for business unless they agree to submit the device to the IT department on or before their last day of work for resetting and removal of Firm information. This is the only way currently possible to ensure that all Firm information is removed from the device at the time of termination. The removal of Firm information is crucial to ensure compliance with the Firm's confidentiality and proprietary information policies and objectives.

Please note that whether employees use their personal PCD or a Firm-issued device, the Firm's electronic communications policies, including but not limited to, proper use of communications and computer systems, remain in effect.

Portable Communication Device Use While Driving

Employees who drive on Firm business must abide by all state or local laws prohibiting or limiting PCD (cell phone or personal digital assistant) use while driving. Further, even if usage is

permitted, employees may choose to refrain from using any PCD while driving. "Use" includes, but is not limited to, talking or listening to another person or sending an electronic or text message via the PCD.

Regardless of the circumstances, including slow or stopped traffic, if any use is permitted while driving, employees must use a hands free device or proceed to a safe location off the road and safely stop the vehicle before placing or accepting a call. If acceptance of a call is absolutely necessary while the employee is driving, and permitted by law, the employee must use a hands-free option and advise the caller that he/she is unable to speak at that time and will return the call shortly.

Under no circumstances should employees feel that they need to place themselves at risk to fulfill business needs.

Since this policy does not require any employee to use a cell phone while driving, employees who are charged with traffic violations resulting from the use of their PCDs while driving will be solely responsible for all liabilities that result from such actions.

Texting and e-mailing while driving is prohibited in all circumstances.

5-8. Camera Phones / Recording Devices

Due to the potential for issues such as invasion of privacy, harassment/sexual harassment, and loss of productivity, no employee may use a camera phone function on any phone, unless the phone is provided by the Firm and its use is on behalf of the Firm, on Firm property or while performing work for the Firm.

The possession or use of tape recorders, or other types of voice recording devices anywhere on Firm property, including to record conversations or activities of other employees or management, or while performing work for the Firm, is also strictly prohibited, unless the device was provided to you by the Firm and is used solely for legitimate business purposes.

Nothing in this policy is intended to interfere with an employee's rights under Section 7 of the National Labor Relations Act to engage in concerted activity for mutual aid and protection, such as, for example, where an employee is recording perceived unsafe working conditions for purposes of discussing them with co-workers and/or management, documenting discussions about terms and conditions of employment, etc.

5-9. Personal Visits and Telephone Calls

Disruptions during working time can lead to errors and delays. Therefore, we ask that personal telephone calls and texts be kept to a minimum, and only be made or received after working time, or during lunch or break time, unless in the event of an emergency.

For safety and security reasons, employees are prohibited from having personal guests visit or accompany them anywhere in our facilities other than the reception areas.

5-10. Solicitation and Distribution

To avoid distraction and in order to maintain and promote safe and efficient operations, Comstock Protective Services has established rules, which govern solicitation, distribution of written material, and entry into work areas.

Comstock Protective Services will allow limited solicitation/distribution of certain products, printed or written literature solely with the pre-approval of the Office Manager. In addition, solicitation and distribution can only be done on break times, lunch times or pre-approved times by management.

All persons are expected to comply with the above rules. Failure to obey these rules may result in appropriate disciplinary action up to and including discharge. Please consult the Office Manager with any questions regarding this policy.

5-11. Confidential Firm Information

During the course of work, an employee may become aware of confidential information about Comstock Protective Services business, including but not limited to information regarding Firm finances, pricing, products and new product development, software and computer programs, marketing strategies, suppliers, customers and potential customers, and knowledge, skills and abilities of personnel. An employee also may become aware of similar confidential information belonging to the Firm's clients. It is extremely important that all such information remain confidential, and particularly not be disclosed to our competitors. Any employee who improperly copies, removes (whether physically or electronically), uses or discloses confidential information to anyone outside of the Firm may be subject to disciplinary action, up to and including discharge. Employees may be required to sign an agreement reiterating these obligations.

5-12. Conflict of Interest and Business Ethics

It is Comstock Protective Services policy that all employees avoid any conflict between their personal interests and those of the Firm. The purpose of this policy is to ensure that the Firm's honesty and integrity, and therefore its reputation, are not compromised. The fundamental principle guiding this policy is that no employee should have, or appear to have, personal interests or relationships that actually or potentially conflict with the best interests of the Firm.

It is not possible to give an exhaustive list of situations that might involve violations of this policy. However, the situations that would constitute a conflict in most cases include but are not limited to:

1. Holding an interest in or accepting free or discounted goods from any organization that does, or is seeking to do, business with the Firm, by any employee who is in a position to

directly or indirectly influence either the Firm's decision to do business, or the terms upon which business would be done with such organization.

2. Holding any interest in an organization that competes with the Firm.
3. Being employed by (including as a consultant) or serving on the board of any organization which does, or is seeking to do, business with the Firm or which competes with the Firm.
4. Profiting personally, e.g., through commissions, loans, expense reimbursements or other payments, from any organization seeking to do business with the Firm.

A conflict of interest would also exist when a member of an employee's immediate family is involved in situations such as those above.

This policy is not intended to prohibit the acceptance of modest courtesies, openly given and accepted as part of the usual business amenities, for example, occasional business-related meals or promotional items of nominal or minor value.

It is your responsibility to report any actual or potential conflict that may exist between you (and your immediate family) and the Firm.

5-13. Use of Facilities, Equipment and Property, Including Intellectual Property

Equipment essential in accomplishing job duties is often expensive and may be difficult to replace. When using property, employees are expected to exercise care, perform required maintenance, and follow all operating instructions, safety standards and guidelines.

Please notify your supervisor if any equipment, machines, or tools appear to be damaged, defective, or are in need of repair. Prompt reporting of loss, damages, defects, and the need for repairs could prevent deterioration of equipment and possible injury to employees or others. Your supervisor can answer any questions about an employee's responsibility for maintenance and care of equipment used on the job.

Employees also are prohibited from any unauthorized use of the Firm's intellectual property, such as audio and video tapes, print materials and software.

Improper, careless, negligent, destructive, or unsafe use or operation of equipment may result in disciplinary action, up to and including discharge.

Further, the Firm is not responsible for any damage to employees' personal belongings unless the employee's supervisor provided advance approval for the employee to bring the personal property to work.

Any workplace injury, accident, or illness must be reported to the employee's supervisor as soon as possible, regardless of the severity of the injury or accident.

5-14. Employee Dress and Personal Appearance

Dress, grooming, and personal cleanliness standards contribute to the morale of all employees and affect the business image Comstock Protective Services presents to customers and visitors.

During business hours or when representing Comstock Protective Services, you should dress and groom yourself according to the requirements of your position and accepted social standards. This is particularly true if your job involves dealing with customers or visitors in person.

If your supervisor feels your personal appearance or dress is inappropriate, you may be asked to leave the workplace until you are properly dressed or groomed. Under such circumstance, you will not be compensated for the time away from work.

Some employees may be required to wear uniforms or safety equipment/clothing. Your supervisor will inform you of such requirement and the specifications related to the wearing and care of uniforms.

5-15. Operation of Vehicles

All employees authorized to drive Firm-owned or leased vehicles or personal vehicles in conducting Firm business must possess a current, valid driver's license and an acceptable driving record. All employees who drive Firm-owned or personal vehicles for business purposes must provide a copy of their personal vehicle "Proof of Insurance" and a certified copy of their DMV driving record. Any change in license status or driving record must be reported to management immediately.

A valid driver's license must be in your possession while operating a vehicle off or on Firm property. It is the responsibility of every employee to drive safely and obey all traffic, vehicle safety, and parking laws or regulations. Drivers must demonstrate safe driving habits at all times.

Firm-owned or leased vehicles may be used only as authorized by management.

Portable Communication Device Use While Driving

Employees who drive on Firm business must abide by all state or local laws prohibiting or limiting portable communication device (PCD) use, including cell phones or personal digital assistants, while driving. Further, even if use is permitted, employees may choose to refrain from using any PCD while driving. "Use" includes, but is not limited to, talking or listening to another person or sending an electronic or text message via the PCD.

Regardless of the circumstances, including slow or stopped traffic, if any use is permitted while driving, employees should proceed to a safe location off the road and safely stop the vehicle before placing or accepting a call. If acceptance of a call is absolutely necessary while the employee is driving, and permitted by law, the employee must use a hands-free option and advise the caller that he/she is unable to speak at that time and will return the call shortly.

Under no circumstances should employees feel that they need to place themselves at risk to fulfill business needs.

Since this policy does not require any employee to use a PCD while driving, employees who are charged with traffic violations resulting from the use of their PCDs while driving will be solely responsible for all liabilities that result from such actions.

Texting and e-mailing while driving is prohibited in all circumstances.

5-16. If You Must Leave Us

Should you decide to leave the Firm, it is preferred and not required, that you provide your supervisor with as much advance written notice as possible of your departure.

All Firm property including, but not limited to, keys, PCD's, security cards, laptop computers, uniforms, etc. must be returned at separation. Employees also must return all of the Firm's confidential information upon separation. To the extent permitted by law, employees will be required to repay the Firm for any lost or damaged Firm property.

As noted previously, all employees are employed at-will and nothing in this guidebook changes that status.

5-17. Exit Interview

Employees who resign may be asked to participate in a voluntary exit interview with the Office Manager or Deputy Director, if possible.

Section 6 - Health and Safety

6-1. Health and Safety

The health and safety of employees and others on Firm property are of critical concern to Comstock Protective Services. The Firm intends to comply with all health and OSHA regulations applicable to our business. To this end, we must rely upon employees to ensure that work areas are kept safe and free of hazardous conditions. Employees are required to be conscientious about workplace safety, including proper operating methods, and recognize dangerous conditions or hazards. Any unsafe conditions or potential hazards should be reported to management immediately, even if the problem appears to be corrected. Any suspicion of a concealed danger present on the Firm's premises, or in a product, facility, piece of equipment, process or business practice for which the Firm is responsible should be brought to the attention of management immediately.

The Firm is concerned for the safety of all employees, and with that goal in mind, may issue policies, procedures and guidelines that are more restrictive than OSHA regulations. The Firm may also issue rules and guidelines regarding the handling and disposal of hazardous substances and waste. All employees should familiarize themselves with these policies, procedures and guidelines, as strict compliance will be expected.

6-2. Injury Reporting Procedure

Employees are required to report any work-related injury or illness, no matter how small, to their supervisor. The supervisor will supply, and the employee shall help the supervisor complete the required injury and illness incident report. In addition, the supervisor will supply and the employee shall complete the employee portion of "Employee's Claim for Workers' Compensation Benefits." The Firm will complete and return a copy of the form to the employee as required by applicable laws governing workers' compensation.

6-3. Workplace Violence Prevention

Comstock Protective Services is committed to providing a safe workplace. The purpose of this policy is to minimize the risk of personal injury to employees and damage to Firm and personal property. The Firm strictly prohibits workplace violence. Acts of violence and/or threats of violence, whether expressed or implied, toward individuals in the Firm workplace are prohibited and will not be tolerated. All reports of incidents will be taken seriously and will be addressed appropriately. This policy defines prohibited conduct, as well as general procedures and potential responsive steps in the unfortunate event that workplace violence occurs despite these preventive measures.

The Firm specifically discourages you from engaging in any physical confrontation with a violent or potentially violent individual. We do however, expect and encourage you to exercise reasonable judgment in identifying potentially dangerous situations.

Prohibited Conduct

Threats, threatening language or any other acts of aggression or violence made toward or by any Firm employee WILL NOT BE TOLERATED. For purposes of this policy, a threat includes any verbal or physical harassment or abuse, any attempt at intimidating or instilling fear in others, menacing gestures, flashing of weapons, stalking or any other hostile, aggressive, injurious or destructive action undertaken for the purpose of domination or intimidation. To the extent permitted by law, visitors are prohibited from carrying weapons onto Firm premises, with the exception of current or retired peace officers.

Any employee who commits workplace violence will be subject to disciplinary action up to and including termination of employment and direction to stay away from Firm property. In addition, the Firm may, at its sole discretion, seek and obtain a restraining order against any violators of this policy. Violators may also be subject to criminal prosecution.

Additionally, where an employee is convicted of a crime of violence or threat of violence under any criminal code provision, the Firm reserves the right to determine whether the conduct involved may adversely affect the legitimate business interests of the Firm, and may implement corrective action up to and including discharge as a result. Any employee convicted of such a crime must report the conviction to the Firm absent a court order to the contrary. Failure to do so is a violation of this policy and subjects the employee to disciplinary action, up to and including termination from employment.

Procedures for Reporting a Threat

All potentially dangerous situations, including threats by co-workers, should be reported immediately to any member of management with whom you feel comfortable. In the event that an employee believes that a threat or act of violence has been made against that employee or others, the employee should report the details immediately to his/her supervisor and/or the Office Manager.

A 9-1-1 call may be appropriate first, in the good judgment of the employees or managers involved. Under this policy, decisions may have to be made quickly to prevent a threat from being carried out, a violent act from occurring, or a life-threatening situation from developing. Nothing in this policy is intended to prevent quick action to stop or reduce the risk of harm to anyone, including requesting immediate assistance from law enforcement or emergency response resources.

Reports of threats may be maintained confidential to the extent maintaining confidentiality does not impede our ability to investigate and respond to the complaints. All threats will be promptly investigated. All employees must cooperate with all investigations. No employee will be subjected to retaliation, intimidation or disciplinary action as a result of reporting a threat in good faith under this policy.

All incidents of violence and threats of violence that are reported will be taken seriously and investigated. The Firm will make the sole determination of whether, and to what extent, threats

or acts of violence will be acted upon by the Firm. In making this determination, the Firm may undertake a case-by-case analysis in order to ascertain whether there is a reasonable basis to believe that violation of this policy has occurred, whether preventive or corrective action is appropriate, and if so, what type of preventative or corrective action the Firm would undertake.

If you are the recipient of a threat made by an outside party, please follow the steps detailed in this section. It is important for us to be aware of any potential danger in our offices. Indeed, we want to take effective measures to protect everyone from the threat of a violent act by an employee or by anyone else.

6-4. Inspections

Comstock Protective Services reserves the right to require employees while on Firm property, or on client property, to agree to the inspection of their persons, personal possessions and property, personal vehicles parked on Firm or client property, and work areas. This includes lockers, vehicles, desks, cabinets, work stations, packages, handbags, briefcases and other personal possessions or places of concealment, as well as personal mail sent to the Firm or to its clients. Employees are expected to cooperate in the conduct of any search or inspection.

6-5. Use of Tobacco Products

Smoking, including the use of e-cigarettes, and the use of chewing tobacco is prohibited on Firm premises, client premises, and in all Firm vehicles.

6-6. Maintenance of Work Area

Comstock Protective Services provides safe and suitable working conditions for all employees. Everyone is urged to cooperate in every way to maintain this environment. Work areas should be left in an orderly condition at the close of the day.

6-7. Emergency Preparedness

In case of emergencies, dial "911". If necessary, evacuate the building in a safe and quick manner. Evacuation will be made to the edge of the parking lot in front of the building. It is the responsibility of all able employees to assist any persons with disabilities. All employees must check in with the Office Manager to ensure everyone has been accounted for prior to departing. Fire exits, fire extinguishers and first-aid kits are located at the office. Ensure that exits and areas near fire extinguishers are kept clear.

Guidebook Acknowledgment

This Employee Guidebook is an important document intended to help you become acquainted with Comstock Protective Services. This document is intended to provide guidelines and general descriptions only; it is not the final word in all cases. Individual circumstances may call for individual attention.

Because the Firm's operations may change, the contents of this Guidebook may be changed at any time, with or without notice, in an individual case or generally, at the sole discretion of management.

Please read the following statements and sign below to indicate your receipt and acknowledgment of this Employee Guidebook.

I have received and read a copy of Comstock Protective Services' Employee Guidebook. I understand that the policies, rules and benefits described in it are subject to change at the sole discretion of the Firm at any time.

I further understand that neither this guidebook nor any other Firm document, confers any contractual right, either express or implied, to remain in the Firm's employ. Nor does it guarantee any fixed terms and conditions of your employment. Your employment is not for any specific time and may be terminated "at will", with or without cause and without prior notice, by the Firm, if it believes it to be within Comstock Protective Services' best interest. Similarly, you may resign for any reason and at any time. No representative of the Firm except the Director has the authority to enter into any agreement for employment for any specified period of time, or to make any agreement contrary to the above. Nothing in the Firm employment procedures/policies or in subsequent employment is intended to be or convey a contract of employment, expressed or implied.

I understand that my signature below indicates that I have read and understand the above statements and that I have received a copy of Comstock Protective Services' Employee Guidebook.

Employee's Printed Name: _____

Position: _____

Employee's Signature: _____

Date: _____

The signed original copy of this acknowledgment should be given to management - it will be filed in your employment file.