

Working at



## Our Global Code of Best Practices

## Introduction

Welcome to BenefitHub! This Global Code of Best Practices (the “Code”) will provide an overview of our company, its culture, policies, and procedures to ensure a successful work experience. As an overview guide, it is not intended to be an all-inclusive document. For full local policy and procedure documents, please visit [benefithub.bamboohr.com](https://benefithub.bamboohr.com).

If, after reading this document or visiting [benefithub.bamboohr.com](https://benefithub.bamboohr.com), you still have questions, please contact your manager and/or Human Resources personnel, who will be able to provide additional information. In this document, we sometimes refer to BenefitHub as the “Company”.

Many matters covered in this Code, such as benefit plan descriptions, are also described in separate Company documents and can be found on BambooHR. These Company documents are always controlling over any statement made in this Code, or by any member of management.

Neither this Code nor any other verbal or written communication by a management representative is, or should be considered, an agreement, contract of employment, or promise of treatment in any particular manner in any given situation, nor does it offer contractual rights.

This document supersedes all prior handbooks and documents of its kind and is current as of the date on the cover page. Any updated versions will promptly be posted on [benefithub.bamboohr.com](https://benefithub.bamboohr.com).

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## Section 1 - Governing Principles of Employment

### 1-1. Introduction

Welcome to BenefitHub! We are delighted you have decided to join our dynamic team.

For team members who are commencing employment with BenefitHub, let me extend a warm and sincere welcome.

For team members who have been with us, many thanks for your past and continued hard work and dedication.

The Global Code of Best Practices works together with your country-specific policy folder found on [benefithub.bamboohr.com](https://benefithub.bamboohr.com) by providing an overview of the Company, its policies, and procedures to help you better understand our culture for a successful start to your employment. As a global company, we attempt to standardize where possible, while simultaneously recognizing local statutory requirements and operating guidelines. It is not intended for the Global Code of Best Practices to be comprehensive, but rather to serve as a guideline. Your My BenefitHub portal will also provide a wealth of information.

By reading and understanding our Global Code of Best Practices, you are off to a great start. I extend my personal best wishes for your success and happiness here at BenefitHub and hope that you have a truly inspiring work experience. We very much appreciate that it is team members like you who have built our company and have provided all the great products and services that our customers love and rely upon. We are certainly counting on you to help us continue our fast pace of growth and to create new opportunities in the future.

Seif Saghri, CEO

### 1-2. What We Do

At BenefitHub, we have reinvented how employee and member benefits are delivered.

We understand that employers benefit from a happy and motivated workforce. We help companies find ways to compensate their team members by offering an advantage and a reward for hard work and commitment to their employer. Our digital interface helps companies serve their team member's needs through an all-inclusive platform of employee-centric benefits. Everything needed to help facilitate a healthy work-life balance is available on My BenefitHub.

We provide millions of employees and association members around the globe, including you, with access to thousands of benefits, perks, and discounts - all on a dynamic and customizable benefit platform.



### 1-3. Our History

In 1999, BenefitHub developed the first “Online Member Discount Marketplace” in the US, and quickly signed several major clients. A key milestone came in 2000 when the largest bank in the U.S. at that time launched our service to its 250,000 members. They soon wanted to add wellness (including nationwide payroll deducted gym discounts), local deals, a member purchase program, and voluntary benefits to the platform. As BenefitHub was designed from the ground up with a modular architecture, customization like that is easy. Clients choose the benefits or tools they wish to include, typically a mix of their own current benefits plus new ones we offer to expand their benefits package. Today, over 10,000 companies in five countries, as well as hundreds of associations, hospital systems, non-profits, plus state and municipal governments use BenefitHub.

Today, BenefitHub is a leading member and member benefits technology company. With offices currently in New York, Tampa, India, Canada, Italy, Mexico, and the United Kingdom, we serve employers with as many as 1.5 million employees, and membership organizations with as many as 40 million members. Five of the top ten largest employers in the US, as well as dozens of other Fortune 500/100 clients, use BenefitHub.

### 1-4. Mission Statement

**To help millions of people improve the quality of their daily lives through accessing the world's largest selection of personally relevant benefits.**

### 1-5. Goal

To be the world's most widely distributed benefits platform.

### 1-6. Our Company Values

- Seek to benefit our customers as the foundation for all we do
- Listen to all ideas
- Give and welcome constructive feedback
- Be open, transparent and honest
- Always do the right thing
- Team diversity is our fuel for achieving success
- Have fun!



## 1-7. Diversity at BenefitHub

Just bring yourself.

We like you just how you are.

We know it takes all kinds to help us innovate. So, we're building a culture where difference is valued. Our dedication to inclusion across race, gender, age, religion, identity, and experience drives us forward every day.

## 1-8. The Work Environment and How We Work Together

As we all spend the majority of our waking hours at work, everyone values a harmonious, pleasant, fun and professional work environment. We value each and every team member and we strive to promote a culture that respects diversity and inclusion. We place a huge emphasis on how we communicate with and treat fellow team members. To be successful at BenefitHub, we expect our team members to look beyond legal requirements and treat everyone with civility and respect at all times. While it is unreasonable to assume that everyone will get along at all times – we each have opinions and reasons to support them – valuing others' opinions and feelings, and treating our co-workers with kindness and respect, benefits all of us in making BenefitHub an exceptional place to work. Professionalism and ethical actions are the guiding principles of the BenefitHub workplace.

We have therefore adopted a Zero Tolerance policy for any of the following:

- harassment in any form
- discrimination
- bullying
- violence
- retaliation
- any other type of negative, inappropriate, and/or disruptive behavior

Anyone who observes or learns of these types of behavior or has reason to be concerned should immediately report the information to Human Resources or their manager.

Violations of any items listed in this section are taken very seriously and any and all reports of a possible violation will be thoroughly investigated. Although confidentiality cannot be guaranteed in the course of any such investigation, reasonable efforts will be made to maintain confidentiality by only involving those concerned with the investigation.

We will remind all parties of an investigation of the importance of confidentiality and zero tolerance for any form of retaliation for team members reporting or involved in any type of investigation. Anyone feeling they have experienced retaliation should report it to Human Resources.

Violations of any items listed in this section will include actions pursuant to our progressive discipline policy, up to and including immediate dismissal.



## 1-9. Equal Employment Opportunity

**BenefitHub is dedicated to equal employment opportunity for our applicants and our team members. It is our policy to afford equal opportunity to all team members and applicants without regard to actual or perceived race, creed, color, religion, alienage or national origin, ancestry, citizenship status, age, disability or handicap, sex, marital status, veteran status, sexual orientation, genetic information, or any other characteristic or status protected by applicable federal, state, and local laws, regulations, and ordinances.**

Although not an exhaustive list, below are examples of conduct that could constitute a violation of this Global Code of Best Practices:

- Harassment on the basis of race, color, religion, sex, sexual orientation, national origin, disability, genetic information, age, or any form of harassment
- Sexual harassment
- Retaliation for filing a charge of discrimination, participating in an investigation, or opposing discriminatory practice
- Employment decisions based on stereotypes or assumptions about the abilities, traits, or performance of individuals of a certain sex, sexual orientation, race, age, religion, or ethnic group, or individuals with disabilities, or based on myths or assumptions about an individual's genetic information
- Denial of any employment opportunity to a team member due to an individual's race, religion, sexual orientation, national origin, or disability, or their participation in schools or places of worship with a particular racial, ethnic, or religious group
- Discrimination or harassment of any type

The Company will endeavor as required by applicable law to make a reasonable accommodations for known physical or mental limitations of qualified team members with disabilities unless the accommodation results in undue hardship on the business operations. If you need assistance to perform your job duties because of a physical or mental condition, please let Human Resources know.

The Company will endeavor to accommodate the sincere religious beliefs of its team members to the extent such accommodation does not pose an undue hardship on the Company's operations. If team members wish to request such an accommodation, they should contact Human Resources.

## 1-10. Drugs and Alcohol in the Workplace

To help ensure a safe, healthy and productive working environment for our team members and others BenefitHub has adopted a policy of maintaining a drug and alcohol-free environment during work hours (other than for alcohol served at sponsored Company



events). This policy applies to all team members and other individuals who perform tasks for the Company.

The unlawful or unauthorized use, abuse, solicitation, theft, possession, transfer, purchase, sale, or distribution of controlled substances, drug paraphernalia, or alcohol by an individual anywhere on Company premises, while on Company business (whether or not on Company premises), or while representing the Company, is counterproductive and therefore strictly prohibited. Team members and other individuals who work for the Company also are prohibited from reporting to work or working while they are using or under the influence of any alcohol, controlled substances or other drugs, which may impact the team member's ability to perform their job or otherwise pose safety concerns, except when (i) the use is pursuant to a licensed medical practitioner's instructions, and (ii) the licensed medical practitioner authorized the team member or individual to report to work, and (iii) you have provided prior written notice and a copy of the medical practitioner's authorization to the Human Resources department. However, this does not extend any right to report to work under the influence of medical marijuana or to use medical marijuana as a defense to a positive drug test if the team member is subject to any drug testing requirement, to the extent permitted by and in accordance with applicable law.

In the spirit of maintaining a policy of non-discrimination, the Company will endeavor to make reasonable accommodations as may be required by applicable law to assist individuals recovering from substance and alcohol dependencies, and those who have a medical history which reflects treatment for substance abuse conditions. However, team members may not request an accommodation to avoid discipline for a prior or contemporaneous policy violation. We encourage team members to seek assistance before their substance abuse or alcohol misuse renders them unable to perform the essential functions of their jobs or jeopardizes the health and safety of any Company team member, including themselves.

Violation of this policy will result in disciplinary action, up to and including discharge.

## 1-11. Workplace Violence

There are some things you just cannot compromise, and workplace safety is one of them. In the spirit of continuing to provide a safe, comfortable, and productive work environment for all team members, we are strongly committed to minimizing the risk of personal injury or harm to all, and damage to Company and personal property.

### **BEHAVIORS THAT WILL NOT BE TOLERATED AT BENEFITHUB:**

- threats
- threatening language
- or any other acts of aggression or violence made toward or by any team member
- 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 behavior, aggressive, injurious or destructive action undertaken for the purpose of domination or intimidation

**THIS IS BY NO MEANS AN EXHAUSTIVE LIST AND ONLY PROVIDES EXAMPLES OF THE TYPE OF BEHAVIORS THAT WILL NOT BE TOLERATED**

We do not expect team members to physically subdue a threatening or violent individual. Indeed, BenefitHub specifically discourages team members from engaging in any physical confrontation with a violent or potentially violent individual. BenefitHub expects and encourages team members to exercise reasonable judgment in identifying potentially dangerous situations.

To the extent permitted by law and as required by the landlord rules that apply to each office location, team members and visitors are prohibited from carrying weapons onto Company premises.

**Procedures for Reporting a Threat**

All potentially dangerous situations, including threats by team members, should be reported immediately to any member of management with whom the team member feels comfortable. Reports of threats will be maintained confidential to the extent that doing so does not impede BenefitHub's ability to comply with its legal obligations or to investigate and respond to the complaints. All threats will be promptly investigated. All team members must cooperate with all investigations. No team member will be subjected to retaliation, intimidation, or disciplinary action as a result of reporting a threat in good faith under this policy.

If the Company determines that someone has violated this policy, the Company will take swift and appropriate corrective action.

If the team member is the recipient of a threat made by an outside party, that team member should follow the steps detailed in this section. It is important for the Company to be aware of any potential danger in its offices. Indeed, the Company wants to take effective measures to protect everyone from the threat of a violent act by team members or by anyone else.

**1-12. Attendance**

Why is the attendance policy so important to your success?

The objective of BenefitHub's Attendance Policy is to maintain the productivity necessary to provide the excellent levels of customer service our clients, users, vendors and partners have come to expect. When everyone follows this attendance policy, it allows us all to trust and rely on each other, creating a more productive and less stressful team environment. Collaboration is one of our pillars for success. Showing up for work at your designated time and completing the work you've committed to is essential to our ability to meet and exceed our goal of providing outstanding services for our customers.



## **Leave/Time Off**

As a global operation, we strive to standardize leave/time off to the extent possible, while also recognizing the unique legal requirements and customary practices in the countries in which we operate. To that end, specific guidelines for your leave/time off benefits can be found on [benefithub.bamboohr.com](https://benefithub.bamboohr.com). All team members at BenefitHub are expected to know the Company's leave/time off policy for the location where they work. To learn more about your generous leave/time off benefits, please visit [benefithub.bamboohr.com](https://benefithub.bamboohr.com).

## **BenefitHub's Goals for You**

At BenefitHub, we thrive on consistently providing our customers with the best service experience possible. To that end, we need all team members empowered to manage their own attendance. We expect nothing less than regular attendance from every BenefitHub team member, but we also recognize that compliance may appear different in various roles within the organization (even week-to-week). Our flexible work program is designed to encourage every BenefitHub team member to work directly with their manager to maintain a work environment that allows them to best serve our customers. The following materials will act as a guideline for your continued success.

## **Schedule Changes**

The most critical component of any schedule change is notifying your Manger as soon as possible. At BenefitHub, team members are expected to work their assigned hours/full workday. When a team member is out (scheduled or unexpectedly), the team member is responsible for notifying their manager as soon as reasonably able and properly placing the request via the request time off section on your assigned HRIS (Human Resource Information System).

## **Punctuality**

We need everyone to show up on time for their scheduled shifts so that we can support all of our peers and customers to the fullest extent. Your presence at BenefitHub is important, and if you're late, it will likely negatively affect someone you work with. Do your best to arrive when scheduled every day. If you think that you'll be late to work, notify your manager as soon as you can.

## **Remote Work Arrangements**

At BenefitHub we are always remote work ready. In any emergency and at all times, all team members should be prepared to work remotely or from home. We also afford flexibility, allowing team members to work from home from time-to-time with management pre-approval. All work from home is logged, so it is important that you place a "WFH" request on [benefithub.bamboohr.com](https://benefithub.bamboohr.com) by following the same process that you would to request time off. Remote work arrangements for illness or injury are handled differently and require that the



team member and manager work with Human Resources to devise the appropriate solution. Team members working remotely are expected to be available and online as a normal part of their workday.

### **In/Out Office notifications**

If you're out of the office, whether for as little as one day or a series of consecutive days, set your Automatic Reply (Out of Office) settings in your Outlook calendar, for both internal and external customers. You will also need to make the appropriate changes in routing telephone calls, if appropriate.

### **Out of Office Etiquette**

- Activate an automatic Out of Office message on your computer
- Include dates you will be out, if you will have access to and be checking email and phone calls
- Include your backup arrangements
- Keep it professional
- If you will miss scheduled and accepted meetings, please let the appropriate meeting attendees know or send an alternate to cover as appropriate and be sure to cancel meetings where you are the host
- Send an email to specific people that may need a heads up you will be out in advance so the first time they are learning you will be out is not by the OOO notification when they send you an email

For example:

#### **Email Out-of-Office Automatic Replies**

Thank you for your email. I will be out of the office from (dates). I will respond to your email upon my return on (date). If you need immediate assistance, please contact (point of contact's name) at (phone number, email).

#### **Voicemail Greetings Out-of-Office**

You have reached (name), (title) at BenefitHub. I will be out of the office until (date). Please leave a detailed message and I will respond to your call upon my return. If you need immediate assistance, please contact (point of contact's name) at (phone number, email).

#### **In-Office**

You have reached (name), (title) at BenefitHub. I'm currently away from my desk or on the other line. Please leave a detailed message, and I'll return your call as soon as possible. Thank you.

Any time a team member is absent from work, whether for scheduled or unscheduled time, you must log into the HRIS to record your absence. Failure to do so could result in disciplinary action.



## 1-13. Personal Appearance and Grooming

At BenefitHub, we enjoy a relaxed dress environment and want team members to be comfortable at work. As we occasionally have clients and customers visiting, we encourage everyone to be comfortable and presentable. Appearance, grooming, and work attire should reflect your position and promote a professional work environment. Our dress code is best described as “casually-oriented business”. Proper jeans are acceptable; however, offensive/revealing clothing items are not permitted. If you have questions whether some type of clothing is acceptable, please ask Human Resources. If your personal appearance falls short of Company requirements, your manager will provide you with appropriate advice and you may be sent away from the office on unpaid leave to obtain appropriate clothing.

Here are a few unacceptable clothing items and accessories:

Shorts

Midriff baring shirts

Clothes that are overly revealing, too light or too short

Heavy or overly fragrant cologne or perfume use

Unkempt or ripped Jeans; Jeans are acceptable provided they are clean, neat and in good repair.

## Section 2 - Operational Policies

### 2-1. Standards for Performance

Performance matters at BenefitHub. Every one of our team members is expected to accomplish daily goals. Leadership is committed to evaluating and supporting your performance, expectations, and career. All team members should feel comfortable engaging in dialogue with management concerning performance and personal goals. We evaluate the need for merit-based pay adjustments in recognition of truly superior performance, and your compensation will generally be reviewed once annually and discussed with you by your manager. Ongoing dialogue is encouraged to help everyone succeed at BenefitHub, and we encourage and expect all team members to actively participate in a positive, professional, and productive manner while working.

All new and existing hires must clear all aspects of pre-hire and potential periodic post-hire background screening. Subject to applicable laws, BenefitHub reserves the right to terminate employment if the background screening returns information that is detrimental to or does not meet our stands of performance or conduct.

Your first 90 days as a team member are a “probationary period” and you should expect regular “check-ins” to help you become acclimated to your new job and the culture at BenefitHub and to set your performance goals for success. Everyone is at a difference place in their career, their employment life cycle, and just their basic need for feedback. If your manager is not scheduling enough regular meeting times to satisfy your needs, please reach out and ask them for time.

After 90 days you should expect a more formal review of your performance no less than once a year. Again, if you need more frequent feedback on your goals or wish to discuss career



development, please don't hesitate to ask your manager for a meeting.

The use of progressive discipline to address conduct issues such as poor work performance or misconduct may be utilized, when applicable, based on the seriousness of the infraction.

## 2-2. Your Employment Records

During the onboarding process, team members provide BenefitHub with key personal information. This information is housed in our Human Resource Information System (HRIS).

Team members are required to keep their contact and other key personal information updated and readily available to provide important Company information such as tax forms or alerts in weather-related or other emergency situations. Out of date emergency contacts limit the Company's ability to relay urgent information to team members and can potentially have adverse consequences for BenefitHub and its clients.

Team members also should inform Human Resources and/or update this information via their assigned HRIS of any specialized training or skills they acquire, as well as any changes to any required licenses or visas. Unreported changes of address, marital status, etc. can affect withholding tax and benefit coverage.

## 2-3. Work Week

At BenefitHub, many positions enjoy a flexible work schedule. This means that work start and stop times can fluctuate. Some customer-facing and other jobs, however, do not permit this type of arrangement. Your manager will have final approval on your work schedule.

Standard business hours will be established and communicated for each location, although they may be changed by the Company, and business needs may from time to time require work outside these established hours and/or on the weekends. To provide adequate departmental coverage and maintain required client-service levels, individual team member schedules will be determined by manager. To accommodate the needs of the business, at some point BenefitHub may need to change individual work schedules on either a short-term or long-term basis. Management will provide as much notification as possible, and work with team members in a reasonable manner during the transition to a new work schedule. All salaried/exempt team members are expected to work a minimum of 40 hours per week.

Team members will be provided meal and rest periods as required by law. A manager or HR will provide further details.

## 2-4. Timekeeping Procedures

At BenefitHub we expect our team members to work and report their work time with accuracy and integrity. Any misrepresentation of time worked will be addressed through the Company's progressive



discipline process or as otherwise described on [benefithub.bamboohr.com](https://benefithub.bamboohr.com).

## 2-5. Overtime

Like most successful companies, BenefitHub experiences periods of extremely high activity. During these busy periods, additional work may be required from the entire team. Your manager is responsible for monitoring business activity and requesting overtime work if necessary. Reasonable efforts will be made to provide team members with adequate advance notice in such situations.

Any team member who works overtime will be compensated as required by applicable local law or agreement.

Team members may work overtime only with prior management authorization.

## 2-6. Travel Policy

It is the policy of BenefitHub to reimburse team members for reasonable and necessary expenses incurred during approved work-related travel. Team members seeking reimbursement should incur the lowest reasonable travel expenses and exercise care to avoid impropriety or the appearance of impropriety. Reimbursement is allowed only when reimbursement has not been, and will not be, received from other sources. If a circumstance arises that is not specifically covered in the Company's travel policy, then the most conservative course of action should be taken.

Any team member traveling on Company business must understand all elements of the policy as contained on [benefithub.bamboohr.com](https://benefithub.bamboohr.com).

## 2-7. Career Opportunities at BenefitHub

BenefitHub is dedicated to assisting team members in managing their careers and reaching their professional goals through promotion and transfer opportunities. Our open jobs are posted on various job boards and the Company careers page. Team members are encouraged to discuss their performance goals and objectives and necessary training, education, and certifications with their manager during their ongoing performance discussions.

Eligibility requirements:

- Be a current, regular, full-time or part-time team member
- Have been in current position for at least six (6) months
- Performance in good standing
- Meet the job qualifications listed on the job posting
- Provide their current manager with written notice prior to applying for the position



There may be times when the Company decides not to post an open position. The Company reserves the right to seek applicants solely from outside sources or to post positions internally and externally simultaneously to get the best candidate for the position.

You are the best resource of finding new talent for BenefitHub. You know our culture and needs better than anyone, which is why we encourage all team members to refer qualified job applicants for available job openings. All team members are eligible to receive referral awards. When making referrals, team members should send their official referral notice to [careers@benefithub.com](mailto:careers@benefithub.com), and Human Resources will then notify the team member if there are any questions. If the candidate you refer is hired and satisfactorily completes his or her probationary period as determined by their manager, the referring team member is eligible to receive a monetary award. The reward is currently a gross amount of \$500 for regular full-time hires that successfully pass the probationary period and complete ninety (90) days of service with the Company.

## 2-8. On the job Injuries

All injuries, regardless of fault or seriousness, must immediately be reported to Human Resources or management to ensure compliance with applicable legal and workers' compensation reporting requirements. The failure to do so may result in disciplinary action up to and including termination, if appropriate.

## 2-9. Proprietary Information and Trade Secrets

**Non-public, proprietary or confidential information and technology, trade secrets, financial and operational plans or data of BenefitHub are among the most valuable assets of the Company and must be protected. They are not to be disclosed to persons inside or outside the Company, except with proper authorization or in accordance with established policies and procedures.**

Confidential information can include any financial, commercial or technical information which is valuable to the Company and would be valuable to the Company's competitors. Such information might include but is not limited to: business and marketing plans; customer lists and specifications; acquisition plans; financial data; plans for or results of research and development; field testing; manufacturing methods and apparatus; cost figures; potential new products; computer information and software; and special techniques unique to the company.

No unlawful or improper means may be used to acquire confidential or proprietary information from any competitor, supplier or customer.

## 2-10. Conduct in the Marketplace

Most economies are based on the principle of a free and competitive market. To make sure that this principle carries over to the marketplace, most countries have laws prohibiting business practices that interfere with competition. These laws are designed to prevent businesses from setting prices to keep



other players out of the market, team members from trading nonpublic information for their own profit, and anyone from offering bribes or other corrupt payments to obtain an unfair advantage.

The Company abides by these laws, and team members must avoid conduct that would even suggest or appear to run afoul of the law. The following section sets forth the basic principles team members should follow and respect. Please contact the Company's General Counsel with any questions about how these laws apply to you.

## Antitrust

Many government antitrust laws govern the relationships between competitors and are generally designed to maintain and promote competition in the marketplace. It is illegal to violate antitrust laws, and punishment can result in imprisonment and fines. Violation of antitrust laws can have a devastating impact to both the Company's and the team member's reputations.

In order to ensure that the company is acting independently and in its own interest in all commercial situations affecting the competitive conditions of trade, as well as to avoid practices that restrict competition, team members must observe the following rules:

- Do not enter into any agreement or tacit understanding with competitors
- When participating in joint ventures and industry associations involving competitors, limit communications to those actually required for the legitimate business of the joint endeavor
- Deal fairly with all customers and suppliers, including those with whom we compete
- Respect our customers' freedom to conduct their business as they see fit, including setting prices at which they wish to sell their products
- Avoid any use of coercion in the sale of products to customers, such as forcing a customer to purchase unwanted products.
- Refrain from using any market power or market information in a way which may restrict competition
- Avoid any unfair or deceptive act or practice

Team members of the company and competitors may from time to time meet, talk, and attend the same meetings or events. The Company may sell to or enter into appropriate licensing agreements with its competitors or participate with competitors in business or trade shows. Such contacts are neither against the law nor to be avoided, although they require the utmost caution and conformance with the Company's policies and procedures.

Team members should avoid discussing competitive issues on matters such as:

- Pricing policy, including the price or other terms on which the Company or its competitors sell products
- Costs incurred, or profits made in manufacturing products
- Terms of sales and customer identities, as well as the territories in which the Company sells certain products
- Rates of production or percentages of capacity utilized by the Company



- Type or amount of any product that the Company or its competitors will offer for sale
- Market surveys or studies, or the unauthorized exchange of proprietary or confidential information.

It is the responsibility of each manager to comply with the letter and spirit of all antitrust and competition laws as they apply to the Company. Whenever in doubt, team members should bring competition-sensitive issues and any questionable conduct by competitors to the attention of their manager, or to the Company's General Counsel by telephone at extension 2429, or by e-mail to [legal@benefithub.com](mailto:legal@benefithub.com).

### Conflicts of Interest

All team members have a duty to avoid financial, business or other relationships which might be opposed to the interests of the Company or might cause a conflict with the performance of their duties as Company team members.

Team members may not have any employment, consulting or other business relationship with a competitor, customer or supplier to the Company, except with the prior written permission of the Company's Chief Executive Officer.

There are some conflict-of-interest situations that team members should disclose and for which they should obtain written approval before proceeding. These include:

- Any consulting or other significant relationship with, or interest in, any supplier, customer or competitor
- Any personal interest that is competitive with the interests of the Company
- Any business relationship on behalf of the Company with any person who is a relative or a personal friend, or with any company controlled by such a person
- Any position where the team member has influence or control over the job evaluation or compensation of any person who is a relative or a personal friend
- Any personal use or sharing of Company confidential information for profit, such as advising others to buy or sell Company property or products on the basis of such information
- Any personal sale to or purchase from the Company;

Ownership of stock or other financial interests in an outside concern, doing business or in competition with the Company which might adversely influence a team member's responsibilities to the Company is to be avoided by team members and their close family members. Team members may invest in broadly distributed stocks of such concerns, publicly traded on a recognized stock exchange or over-the-counter market provided that the investment does not exceed one percent of the outstanding stock of the corporation or otherwise violate applicable securities laws.

Team members should notify their manager in writing if they or a close family member owns or has a financial interest in a proposed transaction between the Company and a third party, other than a permitted investment in a publicly traded stock.



## Customers and Suppliers

The Company is committed to developing and delivering products and services which meet all contractual obligations and the Company's quality standards.

The Company will select and treat its suppliers of products and services impartially and without discrimination. Suppliers will be evaluated on the basis of price, quality, timely performance, commitment, and reliability.

The Company seeks to do business with suppliers, customers and other third parties who adhere to the same ethical standards. When dealing with third parties, team members have a responsibility to watch for potential ethical violations and report them, whether they occur inside the Company or through external interactions with customers, businesses, or government officials. Any such concerns should be reported to a manager or the Company's General Counsel at extension 2429, or by email at [legal@benefithub.com](mailto:legal@benefithub.com).

## Gifts and Entertainment

For more information about the Company's standards for gifts, please see both the Gratuity Policy & Anti-Corruption Policy, available on [benefithub.bamboohr.com](http://benefithub.bamboohr.com).

## Foreign Government Officials

For more information about the Company's standards Anti-Corruption and FCPA compliance, please see the Company's Anti-Corruption Policy, available on [benefithub.bamboohr.com](http://benefithub.bamboohr.com).

## Government Relations

Government relations includes all contacts between the Company and governments, government agencies and representatives, in the United States and abroad. Team members may only interact with government entities on Company business according to established Company practices and procedures and with the highest ethical standards.

The Company will cooperate with every legitimate request for information from government sources to the extent that the materials requested are not protected by attorney-client or other privilege or protection. If a government authority requests information or access to files, it must be discussed with the Company's General Counsel before any response is made. If the request comes from an official with a search warrant, cooperate and immediately also contact the Company's General Counsel without delay at (813) 675-2200 ext. 2429, or by e-mail at [legal@benefithub.com](mailto:legal@benefithub.com).

Never destroy Company documents outside the ordinary course of business or otherwise alter them without prior written approval of the Company's General Counsel, who can be reached at (813)675-2200 ext. 2429, or by email at [legal@benefithub.com](mailto:legal@benefithub.com). For more information about the requirement for preserving Company documents, see the Company's Data Retention Policy on [benefithub.bamboohr.com](http://benefithub.bamboohr.com).

When submitting information to any authority, the Company must take appropriate steps to protect its confidentiality. In many countries, information in government files is available to the public upon request. While the object of such laws is to promote open and accountable government, this can also allow competitors to obtain critical information about us.



The Company must not retain a government employee to perform services except under written contract with the government specifying the nature of services to be provided. Care must be taken so that the service provided cannot be misinterpreted as a means to provide improper payments.

Team members are expected to limit the entertainment of government representatives so that it does not compromise – or appear to compromise – the employees, representatives, or the Company in any way.

Contact the Company's General Counsel at (813)675-2200 ext. 2429, or by email at [legal@benefithub.com](mailto:legal@benefithub.com), if you have questions about this policy for receive any request for information from any government official or agent outside the ordinary course of business.

### Insider Trading

Insider trading is buying or selling shares based on nonpublic information. It is prohibited by this Code as well as federal and state securities laws. Team members are not to buy or sell securities, property, or assets of the Company or any Company vendor or client on the basis of nonpublic information acquired through employment at the Company. Team members are also prohibited from disclosing such information to anyone outside the Company until the information has been publicly disclosed. This prohibition applies whether such information comes from the Company or another entity with which the Company has a confidential relationship.

### Anti-Corruption

As an honest and ethical company, we cannot tolerate bribery of any type. Receiving or offering gifts, travel, or anything of value to any potential or current client, customer, vendor or other third party with which the Company potentially or currently does business must comply with Company policies regarding such items. For more information regarding anti-corruption procedures, please reference the Anti-Corruption policy located on [benefithub.bamboohr.com](http://benefithub.bamboohr.com).

### International Business

This Company operates on a global basis and is therefore subject to national and local laws and regulations that vary from one jurisdiction to another. Our policy is to comply with applicable laws wherever we do business.

In particular, team members must:

- Ensure that payments made to agents or distributors are always for services rendered and are reasonable according to the nature of those services
- Never expand business into a foreign country, where the Company has not previously done business, without first obtaining written approval from management and the Company's General Counsel
- Be aware of dealings with countries that are involved in conflicts or that are subject to international sanctions
- When involved in exports, observe all regulations that govern the shipment of Company



products and services to the importing country, as well as applicable international trade agreements

- Be accurate when furnishing information to any person hired to facilitate export or import transactions
- Consult the Company's General Counsel for specific guidelines to deal with cross-border management of Company business (including membership on the boards of directors of companies located in foreign companies)

## Political Contributions

Team members may not, directly or indirectly, on behalf of the Company or for any purpose related to Company business, make any political contributions in the United States or foreign country without prior written approval of the Company's General Counsel.

In certain countries, political contributions are lawful and expected as a matter of good corporate citizenship. Under these circumstances, contributions may be appropriate if prudent in amount and otherwise consistent with the exercise of good judgment. The laws governing political contributions are typically complex, can be difficult to interpret, and can be construed as corrupt payments if not handled properly. In order to ensure compliance with applicable laws, use of the funds or assets of the Company or any subsidiary, directly or indirectly, to make political contributions, directly or indirectly, must be approved in writing in advance by the Company's General Counsel.

## Section 3 – Time off, Benefits and Perks

### 3-1. Benefits and Perks

BenefitHub is proud to offer highly competitive total compensation packages that include a very generous perks and benefits package. A complete listing of all available local group and voluntary benefits along with available discounts and other perks can be found on My BenefitHub.

The Company endeavors to standardize benefit offering where possible, while also recognizing local legal requirements and reasonable customary practice. Team member benefits are outlined on [benefithub.bamboohr.com](http://benefithub.bamboohr.com).

### 3-2. Paid Holidays

All BenefitHub team members are eligible for a generous time off package which includes paid holidays. A complete list of paid holidays for your local office can be found on My BenefitHub and [benefithub.bamboohr.com](http://benefithub.bamboohr.com).

### 3-3. Other Paid Time Off (PTO) and Leave

Team members accrue a set number of hours for paid time off or leave ("PTO") per pay period. Time off tracking is available via your assigned Human Resource Information System (HRIS). Directions on how to set up your HRIS access and how to manage time off requests



can be found on [benefithub.bamboohr.com](https://benefithub.bamboohr.com).

During the first year of employment, PTO is prorated by the number of months actually worked. For Part Time team members, PTO is prorated based on the number of hours actually worked.

Team members are required to submit a request for PTO via their assigned HRIS. Each request must be approved by their manager. Requests should be submitted as far in advance as possible and are approved or declined based on the department's staffing needs.

To provide flexibility in scheduling time off throughout the year, team members may be able to utilize their PTO in advance of accrual with management approval. Team members are encouraged to utilize their PTO each year. In most cases team members will be required to use their PTO before any unpaid time will be granted. Unless governed by local law, Team Members will not accrue time off while away from work for any reasons other than approved PTO.

PTO rules and eligibility vary by location, so please visit [benefithub.bamboohr.com](https://benefithub.bamboohr.com) for specific details in your local office.

## Section 4 - Leaves of Absence

At BenefitHub, we recognize that life happens outside of work which may require a leave of absence. All Company Leave policies can be found on [benefithub.bamboohr.com](https://benefithub.bamboohr.com). Please refer there for more details and up to date information on leave policies that concern you.

### 4-1. Maternity and Paternity Leave

At BenefitHub, we understand the importance of parents spending time with a new child by birth, adoption or legal guardianship. Please visit [benefithub.bamboohr.com](https://benefithub.bamboohr.com) for details.

### 4-2. Bereavement Leave

Death of a loved one is devastating, and grieving is a natural part of the process. At BenefitHub we understand the importance of taking time off during this difficult period. Therefore, all full-time team members are allowed five paid leave days in the event of the death of a close family member. The five-day leave must be taken consecutively following the death after arrangements are made with the team member's manager. Please take into consideration that a close family member is considered by the Company to include, a spouse, domestic partner, child, parent, sibling or any family member recognized by law. We may require verification of death.

Please visit [benefithub.bamboohr.com](https://benefithub.bamboohr.com) for additional details.

### 4-3. Domestic Violence Leave

Team members who have worked for the Company for at least three (3) months may be granted up to three (3) days of unpaid leave in any 12-month period if the team member or a family or household member of the team member is the victim of domestic violence. PTO will be deducted first, followed by up to three days of unpaid leave if a team member has used all



accrued PTO.

Leave may be used to:

- seek an injunction for protection against domestic violence or an injunction for protection in cases of repeat violence, dating violence or sexual violence
- obtain medical care or mental health counseling, or both, for the team member or a family or household member to address physical or psychological injuries resulting from the act of domestic violence
- obtain services from a victim-services organization, including, but not limited to, a domestic violence shelter or program or a rape crisis center as a result of the act of domestic violence
- make their home secure from the perpetrator of the domestic violence or to seek new housing to escape the perpetrator
- seek legal assistance in addressing issues arising from the act of domestic violence

For purposes of this section, "family or household member" is considered to be a spouse, former spouse, person related by blood or marriage, persons who are presently residing together as if a family or who have resided together in the past as if a family, and persons who are parents of a child in common regardless of whether they have been married. With the exception of persons who have a child in common, the family or household members must be currently residing or have in the past resided together in the same single dwelling unit.

Except in cases of imminent danger to the health or safety of the team member or their family or household member or as otherwise legally required, the team member must provide at least one (1) week advance notice of the need for leave is required.

Sufficient documentation of the act of domestic violence, such as a restraining order, police report, or order to appear in court, is also required. Requests for leave and documents in connection with this leave will be kept confidential to the extent permitted by law.

## Section 5 - General Standards of Conduct

### 5-1. Workplace Conduct

BenefitHub endeavors to maintain a positive work environment. All team members are expected to abide by certain rules of conduct, based primarily on honesty, common sense, and fair play.

As individuals' assumptions about workplace conduct may vary, it is important to adopt uniform standards that accurately reflect BenefitHub's Company culture. Unacceptable conduct may subject the offender to disciplinary action, up to and including discharge. In addition to the inappropriate conduct discussed in Sections 1-7 and 1-10 above, the following are examples of some, but not all, additional conduct which is considered unacceptable:

- Obtaining employment on the basis of false or misleading information



- Stealing, removing or defacing BenefitHub property or a co-worker's property, and/or disclosure of confidential information
- Completing another team member's time records
- Violation of safety rules and policies
- Violation of BenefitHub's Drug and Alcohol Policy
- Fighting, threatening or disrupting the work of others or other violations of BenefitHub's Workplace Violence Policy
- Failure to follow lawful instructions of a manager
- Failure to perform assigned job duties
- Violation of the Attendance Policy, including but not limited to irregular attendance, habitual lateness, and/or unexcused absences
- Gambling on Company property
- Wasting or using company property for personal use
- Performing work of a personal nature during working time
- Violation of the Solicitation and Distribution Policy
- Violation of BenefitHub's Harassment or Equal Employment Opportunity Policies
- Violation of the Communication and Computer Systems Policy
- Unsatisfactory job performance
- Any other violation of Company policy

BenefitHub reserves the right to discipline team members who behave contrary to Company policy. BenefitHub will endeavor to utilize progressive discipline but reserves the right in its sole discretion to terminate a team member's employment at any time for any reason.

The observance of these rules will help ensure a safe, productive, and happy workplace.

## 5-2. Use of Social Media

As a technology-based company, we realize our team members are using technology in their everyday lives and respect the right of any team member to maintain a blog or web page or to participate in social media.

However, to protect Company interests and ensure team members focus on their duties, team members must adhere to the following rules regarding these activities:

Team members may not post on a blog or web page or participate on a social media platform, such as Twitter, SnapChat, Facebook, Instagram, LinkedIn, or any similar site during work time, or at any time with Company equipment or property.

In addition, the use of mobile phones, iPad's or any other type of electronic device to watch movies, TV shows, sporting events, etc. is not permitted during work hours (except on your break for a limited and reasonable period of time, using headphones and away from work stations to avoid disrupting other team members.)

All rules regarding Company confidential and proprietary business information apply in full to blogs, web pages, and social media platforms. Any information that cannot be disclosed



through a conversation, a note, or an e-mail also cannot be disclosed in a blog, web page or social networking site.

All posts made by team members online mentioning the Company by name, must have a disclaimer. In such posts, team members should specifically state that the opinion expressed, is their personal opinion and not the Company's. No team member should make online statements about or attributable to BenefitHub's views, as they may harm the Company's image and good name.

Any conduct that is impermissible under the law if expressed in any other form or forum is impermissible if expressed through a blog, web page, or social media site, including, for example, posted material that is discriminatory, obscene, defamatory, libelous, or violent is forbidden.

BenefitHub encourages all team members to keep in mind the speed and manner in which information posted on a blog, web page, and/or social media site is received and often misunderstood by readers. Team members must use their best judgment in making such posts. Team members with any questions should review the guidelines above and/or consult with their manager. Failure to follow these guidelines may result in discipline, up to and including discharge.

### **5-3. Personal and Company-Provided Portable Communication Devices**

BenefitHub-provided laptops should be used exclusively for business purposes. Team members may use Company-issued laptops for limited reasonable personal use in accordance with the Company's Acceptable Use Policy set forth in Section 7-1 below, but understand and acknowledge that they have no reasonable expectation of privacy in regard to the personal use of such devices, and that all use is subject to monitoring to the maximum extent permitted by applicable law. This includes, as permitted, the right to monitor personal communications through Company-owned equipment as necessary for legitimate business purposes.

Some team members may be authorized to use their own cell phone for business purposes. These team members should work with the Company's IT department to configure their phone for business use. Communications sent via a personal phone may also be subject to monitoring if sent through the Company's networks, and the phone must be provided by the team member for inspection and review upon request. No other personal devices are permitted for Company work. Confidential Information and other materials should never be stored on personal devices.

All conversations, text messages and e-mails must be professional in content and tone. When sending a text message or using an assigned laptop or personal cell phone for business purposes, team members must comply with applicable Company guidelines, including policies on sexual harassment, discrimination, conduct, confidentiality, equipment use, and operation of vehicles. Using a Company-issued laptop or phone for personal use during working hours should be limited to isolated personal and emergency situations in accordance with the Company's Acceptable Use Policy set forth in Section 7-1 below.

Team members who use a personal mobile phone for business that resign or are dismissed will be



required to submit the device to the IT department for resetting on or before their last day of work. The IT department will reset and remove all Company information from the device, including but not limited to, contacts, e-mails and photographs. The IT department will use reasonable efforts to preserve or provide team members with their personal data in another form to the extent practicable; however, the team member understands and acknowledges that he or she may lose some or all personal data saved on the device. The removal of Company information is crucial to ensure compliance with the Company's confidential information policies and objectives.

Please note that whether team members use their personal cell phone or a Company-issued laptop, the Company's electronic communications policies, including but not limited to, proper use of communications and computer systems will apply to such device.

#### Portable Communication Device Use While Driving

Team members who drive on Company business must abide by all state or local laws prohibiting or limiting mobile phone use while driving. Further, even if usage is permitted, team members should choose to refrain from using any mobile phone while driving and are encouraged to use the phone's "do not disturb" function or a similar feature. "Use" includes, but is not limited to, talking or listening to another person or sending an electronic or text message via the phone.

Regardless of the circumstances, including slow or stopped traffic, if any use is permitted while driving, team members 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 driving, and permitted by law, team members must use a hands-free option and advise the caller that they are unable to speak at that time and will return the call shortly.

Under no circumstances should team members feel that they need to place themselves or others at risk to fulfill business needs.

Since this policy does not require any team member to use a mobile phone while driving, team members who are charged with traffic violations resulting from the use of their mobile phones, tablets, or other electronic devices while driving will be solely responsible for all tickets, fines, and other liabilities that result from such actions.

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

#### **5-4. Cameras/Recording Devices**

Due to the potential for issues such as invasion of privacy, sexual harassment, loss of productivity, and the potential inappropriate disclosure of confidential information, no team member may use a camera of any type while on Company property or while performing work for the Company without prior written approval from HR.

The use of any voice and/or video recording devices anywhere on Company property, including to record conversations or activities of other team members or management, or while performing work for the Company, is also strictly prohibited, unless approved in advance in writing by the Company's General Counsel and used solely for approved and legitimate business purposes in accordance with



applicable laws, as every location in which we operate has different laws and requirements on participant consent.

### 5-5. Inspections

BenefitHub reserves the right to require team members, while on Company or client property, to agree to the inspection of their persons, personal possessions and property, personal vehicles parked on Company or client property, and work areas. This includes lockers, vehicles, desks, cabinets, workstations, packages, handbags, briefcases and other personal possessions or places of concealment, as well as personal mail sent to the Company or to its clients. Team members are expected to cooperate in the conduct of any search or inspection.

### 5-6. Smoking

Most of our facilities are smoke free. Team members are asked to follow local guidelines on when and where it is appropriate to smoke, and to always be respectful of the wishes and needs of those around you when doing so.

### 5-7. Personal Visits and Telephone Calls

Disruptions during work time can lead to errors and delays. Therefore, personal telephone calls must be kept to a minimum, and only be made or received after working time, or during lunch or break, other than in emergency circumstances.

For safety and security reasons, team members are prohibited from having personal guests (including children) visit or accompanying them anywhere in BenefitHub facilities other than the main reception area.

### 5-8. Confidential Company Information

We are working on some pretty cool things here at BenefitHub, and team members may become aware of confidential information about BenefitHub's business during the course of work, including but not limited to information regarding Company finances, pricing, products and new product development, software and computer programs, marketing strategies, suppliers, customers and potential customers. Team members also may become aware of similar confidential information belonging to the Company's clients. It is extremely important that all such information remain confidential, and particularly not be disclosed to BenefitHub's competitors. It would not be appropriate for any team member to improperly copy, remove (whether physically or electronically), use or disclose confidential information to anyone outside of the Company, and you may find yourself subject to disciplinary action, up to and including termination. Unless prohibited by local law, team members are required to sign a Non-Disclosure agreement prior to beginning employment. This document will provide you with more detail about Company policy regarding Confidential Information and may be updated at any



time.

## 5-9. Health and Safety

We comply with all health and safety laws applicable to our business. To this end, we must rely upon team members to ensure that work areas are kept safe and free of hazardous conditions. Team members are required to be conscientious about workplace safety, including proper operating methods, and be aware of 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 Company's premises, or in a facility, piece of equipment, process, service, or business practice for which the Company is responsible should be brought to the attention of management immediately.

The Company may periodically issue rules and guidelines governing workplace safety and health. The Company may also issue rules and guidelines regarding the handling and disposal of hazardous substances and waste. All team members should familiarize themselves with these rules and guidelines when needed.

## 5-10. Hiring Relatives/Team Member Relationships

To maintain a comfortable work environment for all BenefitHub team members, we will thoroughly review any hiring or employment decision involving a familial relationship among team members. This is especially true where one relative directly or indirectly supervises another relative. To avoid conflicts of interest, BenefitHub may refuse to hire or place a relative in a position where the potential for nepotism might exist.

Personal relationships can also have the potential to create conflict even if there is no supervisory relationship involved. The parties may be separated by reassignment or discharged from employment at the sole discretion of the Company. Accordingly, all parties to any type of intimate personal relationship must immediately inform management.

If team members 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 Company generally will attempt to identify other available positions, but if no alternate position is available, one of the team members must resign. If neither is willing, the Company reserves the right to dismiss one of the team members.

For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the team member is similar to that of persons who are related by blood or marriage (such as a legally recognized civil union).

## 5-11. Publicity/Statements to the Media



All media inquiries concerning BenefitHub must be referred to the Chief Executive Officer or Chief Marketing Officer. Only the Chief Executive Officer or Chief Marketing Officer is authorized to make or approve public statements on behalf of the Company. No team members, unless specifically designated in writing by the Chief Marketing Officer or Chief Executive Officer, are authorized to make any statements on behalf of Company. Any team member wishing to write and/or publish an article, paper, or other publication on behalf of the Company must first obtain written approval from the Chief Executive Officer or Chief Marketing Officer.

## 5-12. Operation of Vehicles

All team members authorized to drive Company-owned or leased vehicles, personal vehicles, or rental cars in conducting Company business must possess a current, valid driver's license and an acceptable driving record. Any change in license status or driving record must be reported to management and HR immediately.

Team members must have a valid driver's license in their possession while operating a vehicle or Company business, whether off or on Company property. It is the responsibility of every team member to drive safely and obey all traffic, vehicle safety, and parking laws or regulations. Drivers must demonstrate safe driving habits at all times, and a team member will be solely responsible for any tickets and/or fines that result from a violation of any law while operating a vehicle on approved Company business.

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

### Portable Communication Device Use While Driving

Team members who drive on Company business must only use mobile devices while driving (if at all) in accordance with Section 5-3 above.

## 5-13. Business Expense Reimbursement

Team members will be reimbursed for reasonable approved expenses incurred in the course of business. Expenses exceeding \$100.00 require pre-approval by Finance. Please complete a "Request to Spend Form" prior to incurring an expense over \$100.00. All expenses must be approved by the team member's supervising manager. Travel and expense reimbursement forms are available on SharePoint and should be submitted at least two weeks in advance of incurring the expense.

Team members are expected to exercise restraint and good judgment when incurring expenses.

Team members should contact their manager in advance if they have any questions about whether an expense will be reimbursed.

## 5-14 If You Must Leave Us



Should you decide to resign your position at BenefitHub, we ask (but don't require) that you provide your manager with at least four (4) weeks advance notice of your departure in order to allow an orderly transition of your responsibilities. Thoughtfulness will be appreciated. All Company property, including but not limited to, keys, access cards, parking permits, laptop computers, etc., must be returned at or prior to departure. Team members must return all of the Company's Confidential Information prior to or upon departure. To the extent permitted by law, team members will be required to repay the Company (through payroll deduction, if lawful) for any lost or damaged Company property.

## Section 6 - Facilities & Housekeeping

### 6-1. Bulletin Boards

Important notices and items of general interest are regularly posted on BenefitHub bulletin boards. Team members should make it a practice to review bulletin boards frequently. This will assist team members in keeping up with what is current at BenefitHub. To avoid confusion, team members should not post or remove any material from the bulletin board without prior written Human Resources approval. The announcements section located on the homepage of [benefithub.bamboohr.com](http://benefithub.bamboohr.com) should also be checked frequently by all team members for global updates. The bulletin board and announcements section are overseen by the Human Resources department.

## Section 7 - Information Security Policies and Procedures

### 7-1. Acceptable Use

The following section provides a summary of BenefitHub's Acceptable Use policy. All operational and information security-related policies are located on [benefithub.bamboohr.com](http://benefithub.bamboohr.com), which each team member is responsible to review and become familiar with.

BenefitHub's objective is to make available appropriate electronic information resources to assist team members in furthering business goals, supporting valid business use, and providing efficient work-related communication. The Acceptable Use policy governs the use of BenefitHub's electronic information resources and defines team member's proper conduct and responsibilities when using any electronic information resource. This policy applies to all team members, contractors, clients, vendors, consultants, and temporary workers who are expressly authorized by BenefitHub to use electronic information resources.

Electronic Company information resources include all computer equipment (including any desktop or laptop computer or other hardware owned or leased by BenefitHub), e-mail accounts, Skype, Slack, Google Drive, OneNote, the BenefitHub computer network, and any software or applications licensed to, by, or for the benefit of BenefitHub.



## 7-2. Information Security

The following section provides only a summary of BenefitHub's Information Security policy. All operational and information security-related policies are located on [benefithub.bamboohr.com](http://benefithub.bamboohr.com).

BenefitHub's Information Security policy provides the framework and minimum guidelines for defining and implementing the appropriate controls for BenefitHub information assets. Specific objectives of this policy and related issue-specific policies include:

- Communicate management's commitment to providing appropriate levels of protection for information assets throughout the organization
- Clearly describe management's expectations of BenefitHub team members and non- team members regarding the protection of information assets
- Define the level of protection requirements for BenefitHub information assets
- Ensure appropriate levels of protection are defined by balancing the value and loss potential of information assets with the cost of security measures and mitigating controls
- Provide the framework, requirements, responsibilities and authorities for implementing and maintaining an effective and efficient information security governance program

## 7-3. Use of Communications and Computer Systems

As with Company Portable Communication Devices, BenefitHub's communication and computer systems are intended primarily for business purposes. Limited personal usage is permitted if it doesn't conflict with job duties or violate any other Company policy. This includes voice mail, e-mail and Internet systems. Team members should not expect privacy while using BenefitHub systems.

BenefitHub may access voice mail and e-mail systems and obtain the communications within the systems, including past voice mail and e-mail messages, without notice. The Company may access the systems at any time and for any reason, including 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 Company operations continue appropriately during the team member's absence.

Further, BenefitHub may monitor and review Internet usage to ensure that such use with Company property, or communications sent via the Company Internet, are appropriate.

The Company in its sole and absolute discretion may store electronic communications for a period of time after the communication is created or delete them.

The Company's policies prohibiting harassment, in their entirety, apply to the use of Company'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 race, national origin, sex, sexual orientation, age, disability, religious beliefs or any other characteristic protected by federal, state or local law, or as otherwise provided in this Code.

Duplication of copyrighted computer software violates the law and is strictly prohibited.



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

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

#### **7-4. Use of Facilities, Equipment and Property, Including Intellectual Property**

BenefitHub has invested significantly in making sure all team members have the necessary equipment to thrive. Equipment essential in accomplishing job duties is costly and difficult to replace. When using Company property, team members are expected to exercise care and report any unusual performance to their manager, and to follow all operating instructions, safety standards, and guidelines.

Team members should notify their manager if any equipment appears to be damaged, defective or in need of repair. Prompt reporting of loss, damages, defects and the need for repairs could prevent further deterioration of equipment and possible injury to team members or others.

Managers can answer questions about team members' responsibility for maintenance and care of equipment used on the job.

Team members also are prohibited from unauthorized use of the Company's intellectual property, such as digital recordings, print materials and software.

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

Further, the Company is not responsible for any damage to team members' personal belongings, whether or not used in connection with Company business.

#### **A Few Closing Words**

The intent of this Global Code of Best Practices is to provide all BenefitHub team members a broad summary of what they should know about the culture and operations at BenefitHub. As an international organization, we recognize that there are unique differences present in all of the locations in which we operate and strive to accommodate them. For specific location policies please visit [benefithub.bamboohr.com](http://benefithub.bamboohr.com). The information in this Global Code of Best Practices is general and further information can be obtained from [benefithub.bamboohr.com](http://benefithub.bamboohr.com), your management, or Human Resources. Policies and procedures contained in this Code will change from time-to-time and every reasonable effort will be made to communicate updates to team members as quickly as possible. Team members should periodically check [benefithub.bamboohr.com](http://benefithub.bamboohr.com) for updates, and should not hesitate to speak to management or Human Resources if they have questions about the Company or its policies and practices.



**General Global Code of Best Practices Acknowledgment**

This Global Code of Best Practices is an important document intended to help team members become acquainted with BenefitHub. 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.

As the Company's operations may change, the contents 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 Handbook.

I understand that the policies, rules and benefits described herein are subject to change at the sole discretion of the Company at any time.

I further understand that my employment is terminable at will, either by myself or the Company, with or without cause or notice, regardless of the length of my employment or the granting of benefits of any kind, unless prohibited under applicable law and/or by agreement.

I understand that no representative of BenefitHub other than the Head of Human Resources may alter "at will" status and any such modification must be in a signed writing.

I understand that my signature below indicates that I have read and understand the above statements and that I have received a copy of the Global Code of Best Practices.

Team member's Printed Name: \_\_\_\_\_

Team member's Signature: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_



## Receipt of Sexual Harassment Policy

It is BenefitHub's policy to prohibit harassment of any team member by a supervisor, team member, customer or vendor on the basis of sex or gender. The purpose of this policy is not to regulate personal morality within the Company. It is to ensure that at the Company, all team members are free from sexual harassment. 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.

Improper conduct can include sexual jokes, vulgar or offensive conversation, commenting about the team member's physical appearance, conversation about one's own or someone else's sex life, or teasing or other conduct directed toward a person because of their gender which is sufficiently severe or pervasive to create an unprofessional and hostile working environment.

If a team member feels they have been subjected to conduct which violates this policy, they should immediately report the matter to Human Resources. If unable for any reason to contact this person, or if the team member has not received a response within five (5) business days after reporting any such incident of perceived harassment, the team member should contact the Company's General Counsel. If the person toward whom the complaint is directed is one of the individuals indicated above, the team member should contact a higher-level manager in their reporting hierarchy. Every report of perceived harassment will be fully investigated, and appropriate corrective action will be taken. All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed. In addition, the Company will not allow any form of retaliation against individuals who report unwelcome conduct to management or who cooperate in the investigations of such reports in accordance with this policy. If the team member feels they have been subjected to any such retaliation, they should report it in the same manner in which a claim of perceived harassment would be reported under this policy. Violation of this policy including any improper retaliatory conduct will result in disciplinary action, up to and including discharge. All team members must cooperate with all investigations.

I have read, and I understand BenefitHub's Sexual Harassment Policy.

Team member's Printed Name: \_\_\_\_\_

Team member's Signature: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_



## Receipt of Non-Discrimination Policy

It is BenefitHub's policy to prohibit intentional and unintentional discrimination of any individual by another person on the basis of any protected classification including, but not limited to, race, color, national origin, disability, religion, marital status, veteran status, sexual orientation or age. The purpose of this policy is not to regulate our team members' personal morality, but to ensure that in the workplace, no one discriminates against another individual.

If the team member feels that he or she has been subjected to conduct which violates this policy, he or she should immediately report the matter to Human Resources. If the team member is unable for any reason to contact HR, or if the team member has not received a response within five (5) business days after reporting any such incident, the team member should contact the Company's General Counsel. If the person toward whom the complaint is directed is one of the individuals indicated above, the team member should contact any higher-level manager in his or her reporting hierarchy. Every report of perceived **discrimination** will be fully investigated, and appropriate corrective action will be taken. All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed. In addition, the Company will not allow any form of retaliation against individuals who report **discrimination** to management or who cooperate in the investigations of such reports in accordance with this policy. If a team member feels he or she has been subjected to any such retaliation, he or she should report it in the same manner in which the team member would report a claim of perceived discrimination under this policy. Violation of this policy including any improper retaliatory conduct will result in disciplinary action, up to and including discharge. All team members must cooperate with all investigations.

I have read, and I understand BenefitHub's Non-Discrimination Policy.

Team member's Printed Name: \_\_\_\_\_

Team member's Signature: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_