



## Employee Handbook Revised 5/10/2018



## Introduction

Welcome to Kent Companies, the *Leaders in Concrete*. Our founder John VanderLaan always said, “*You’ve got to put you people first.*” It was true in 1957, and it is still true today. At Kent Companies, we are in the people business. We know that the success of our company depends on the success of our people every single day. You are at the forefront of every decision made at Kent Companies.

This handbook serves as an overview to Kent Companies procedures and as a guide to what is expected to you as an employee. Kent Companies has a 100% open door policy. We welcome your ideas. We value employee feedback and suggestions. If you have questions about the policies and procedures in this handbook, please ask.

## Mission

- We will create lasting value for our customers by commitment to the highest level of safety, productivity, quality, integrity, service and innovation.
- We will create lasting value for our employees by providing them with career opportunities and investing in their skills.
- We will create lasting value in our communities by investing in opportunities to make them better places to live.

## The Merit Shop Philosophy

Kent Companies is a merit shop. We believe that every member of our organization should be treated as an individual. The merit shop philosophy gives you unlimited opportunity for professional development and achievement. We will provide education and training to develop your talents whenever possible. You reap the rewards of your accomplishments.

## The Four Hallmarks

Kent Companies embodies a “*Make it Happen*” culture. We’re results-oriented, and we embrace *Four Hallmarks* of our work on a daily basis:

- **Safety:** We embrace a 100% hard hat, safety goggle and safety vest culture on every project site. Our priority is to ensure that everyone returns home safely every day.
- **Productivity:** We are pace setters, and we drive the schedule. We strive to be the most productive contractor on site.
- **Quality:** Simply stated, our work looks good. We’re accountable to our customers for delivering concrete related work that exceeds expectations.
- **Customer Service:** We understand our customer’s needs and expectations, and we



make them our priority. We are our customer's problem solver and partner.

## **RED**

RED stands for company and team values. It promotes the Kent Companies brand both visually and in character.



As an organization, Kent Companies embodies the values of Responsibility, Expertise and Determination to our customers, employees and communities every day.

Kent Companies team members work to be responsible, to be an expert in their unique role and to offer complete determination in all they do. RED uniquely signifies Kent Companies and is unmistakable in the marketplace. As we self-inspect our own work, we consistently ask, "*Is it RED?*"

### *Responsibility*

- We are 100% safe on the jobsite every day.
- We are a family.
- We watch out for our team members.
- We are proactive and speak up to prevent mistakes.
- We are accountable to each other and to the customer.
- We perform our work to the best of our ability.
- We deliver on our promises.

### *Expertise*

- We are a world-class team.
- We embrace the Four Hallmarks in our daily work.
- We leverage both new technology and proven experience.
- We understand our customers and their expectations.
- We pursue continuing education.
- We master our skills.

### *Determination*

- We Make it Happen.
- We innovate.
- We are pace-setters and problem-solvers.
- We do whatever it takes to get the job done.
- We work 480 minutes for 8 hours of pay.
- We have an infectious positive outlook.

## **Kent Companies History**

John VanderLaan founded Kent Concrete in Grand Rapids, Michigan in 1957. Kent Concrete specialized in pouring residential flatwork. In the late 1970's, John's sons Al and Roger assumed leadership of the company. As the company grew, it diversified services to include concrete pumping, floor underlayments, concrete polishing and staining, facility services, mudjacking, foundation restoration, excavation and masonry. Innovation and leading project management became Kent's trademark on the job.

In the late 1990's, Kent Concrete became Kent Companies to reflect the full range of services offered to its breadth of commercial clients. Kent Companies expanded to Detroit, Lansing and Traverse City, Michigan as well as Elkhart, Indiana to better serve clients throughout the region. In 2000, Kent Companies acquired what is now Kent Companies, Texas, in Dallas, Texas. Kent Companies Texas serves clients throughout the United States' southern tier, including Louisiana, Arkansas, Oklahoma and Missouri.

In 2008 and 2011, Kent Companies added offices in Charlotte, North Carolina and Central Ohio to provide concrete construction services to an increasingly national customer base. Third-generation company leadership began in 2009 as Al's son Jeff and Roger's son Chris took ownership of Kent Companies.

Today, Kent Companies is building for future generations. The company continues to grow and diversify with additional construction-related services.

## **Kent Companies Operating Divisions**

Kent Companies has several separate specialty divisions that are managed by various vice presidents and division managers. For the commercial work that we perform, we are known simply as "Kent Companies". Our commercial specialties, which are accounted for by separate divisions, include:

- Concrete Construction
- Concrete Pumping
- Site Concrete
- Lightweight Underlayments
- Foundation Stabilization
- Facilities Services
- Floor Polishing & Coatings
- Building Restoration & Waterproofing
- Construction Supply
- Home Services

## **Disclaimer**

No employee handbook can anticipate every circumstance or question about policy. This handbook is a “snapshot” of current policies, procedures, benefits, etc., which are subject to change by Kent Companies. These provisions supersede all current or former policies and practices dealing with the same subject matter or conflicting in any way with these provisions. Nothing in this handbook should be construed as limiting in any way the right of Kent Companies to establish, change, or eliminate terms and conditions of employment, policies, or procedures. Kent Companies will give employees oral or written notice of changes in policies, procedures, benefits, etc. Upon reprinting, changes will be incorporated in a revised handbook. Any questions about the handbook or what it means should be directed to a supervisor or the office manager.

No employee, agent, or other representative of Kent Companies, except the Board of Directors, has any authority to create, modify, or enter into any agreement for employment or relating to terms or conditions of employment, which conflicts with this handbook. Any such agreement must be in writing, the covered employee must be named a party to the agreement, and the agreement must be signed by the employee and the Chief Executive Officer, or it will not be enforceable.

# Compensation

## Employment Categories

It is our intent to clarify the definitions of employment classifications so that employees understand their employment status and benefit eligibility.

Each employee is designated as either Exempt or Non-Exempt from federal and state wage and hour laws. Non-Exempt employees are entitled to overtime pay under the specific provisions of federal and state laws. Exempt employees are excluded from specific provisions of federal and state wage and hour laws. An employee's Exempt or Non-Exempt classification may be changed only upon written notification by Kent Companies management.

It is our policy to make deductions from Exempt employee wages as allowed by the Fair Labor Standards Act. Exempt employees with questions about wage deductions should bring their concerns to the CFO, who will, in turn reimburse the employee for any improper deductions.

In addition to the above categories, each employee will belong to one other employment category:

REGULAR FULL-TIME employees are those who are regularly scheduled to work 30 or more hours per week. Generally, they are eligible for the company's benefit package, subject to the terms, conditions, and limitations of each benefit program.

REGULAR PART-TIME employees are those who are regularly scheduled to work 30 hours or less per week. While they do receive all legally mandated benefits (such as Social Security and workers' compensation insurance), they are ineligible for all of the company's other benefit programs.

## General Pay Information

The law requires that we make certain deductions from every employee's compensation. Among these are applicable federal, state, and local income taxes. We also must deduct Social Security taxes on each employee's earnings up to a specified limit that is called the Social Security "wage base." We match the amount of Social Security taxes paid by each employee.

We offer programs and benefits beyond those required by law. Eligible employees may voluntarily authorize deductions from their paychecks to cover the costs of participation in these programs.

If you have questions concerning why deductions were made from your paycheck or how they were calculated, the CFO can assist in having your questions answered.

## Payroll

Our pay periods run from Sunday through Saturday with payday on the Friday of the following week. Each paycheck will include earnings for all work performed through the end of the previous payroll period. No compensation will be distributed until that Friday. Time for employees will start on the job and finish on the job, unless otherwise authorized by the foreman such as loading time at the yard. This time should be listed separately under individual work codes.

Accurately recording time is the responsibility of every employee. Each employee is responsible to input their time daily into the PayCrew payroll system. Failure to submit your hours via PayCrew will result in not being paid. If there is a discrepancy with your time, you must fill out a paper timesheet and have it signed by your supervisor. Then, the paper copy can be brought to the payroll department for correction.

If you think there is an issue with the PayCrew website and you are unable to submit your hours, you can still submit a paper timesheet to the payroll department. This must be submitted to Julie in the payroll department prior to Monday morning at 8:00am. These can be submitted directly to Julie's office, via fax to 616-534-4645, or emailed to: julieh@kentcompanies.com.

Altering, falsifying, tampering with time records, or recording time on another employee's time record may result in disciplinary action, up to and including termination of employment.

### **Overtime**

When operating requirements or other needs cannot be met during regular working hours, employees may be scheduled to work overtime hours. When possible, advanced notification of these mandatory assignments will be provided. All overtime work must receive the supervisor's prior authorization.

Overtime compensation is paid to all nonexempt employees in accordance with federal and state wage and hour restrictions. Overtime pay is based on actual hours worked in excess of forty (40) hours in a work week. Nonexempt employees will be paid one and one-half (1½) times the regular rate of pay for all hours actually worked in excess of forty (40) hours in a work week. During weeks where different kinds of work may occur that result in different pay rates, overtime will be paid at a rate not less than 1.5 times the established, bona fide, straight-time hourly rate applying to each different kind of work that is being performed during the hours worked over 40 in the workweek.

Failure to work assigned overtime may result in disciplinary action, up to and including possible termination of employment. There will be no "pyramiding" or duplication of premium pay. In other words, an hour of work can only count once for computing premium pay.

### **Travel Reimbursement Policy**

It is each employee's responsibility to get to the jobsite. To help cover the costs of travel to distant jobs, all qualified employees will be reimbursed at the rate of \$.35 per mile for each mile in excess of thirty miles from the yard or office where the employee is normally based, starting on all new jobs after June 6<sup>th</sup>, 2013. For example, an employee who works at a job site that is 40 miles from the base will be reimbursed \$7.00 for travel (10 miles over thirty each way).

At the Company's option, an employee may be required to stay out of town overnight. In this case, the Company will provide suitable accommodations and each employee will receive travel reimbursement of \$20.00 per night for meals and other personal expenses, starting on all new jobs after June 6<sup>th</sup>, 2013.

Travel reimbursements will be determined at the beginning of each job. Mileage will be calculated from the shop for all employees based in Grand Rapids. There will be no travel reimbursement on prevailing rate jobs when the prevailing wages exceed the regular wage.

Employees who are asked to drive a large truck (not pick-ups) will be paid by the hour. No mileage reimbursement will be paid.

Record keeping of out of pocket expenses is the employee's responsibility. This information will be required to complete your annual tax return. The amount you are reimbursed for travel may be considered taxable income if you cannot prove that you had expenses equal to or in excess of the reimbursement.

## Time Off

### Vacation

Full-time employees are eligible for paid vacation days beginning 90 days after their hire date (or when they become a Kent Companies employee; Stepping Stone employees are not eligible). Employees will accrue PTO hours according to the following schedule:

Status	Years of Service	Vacation Hours
Full-Time Hourly	0-4	40
	5-9	80
	10-14	120
	15+	160

### Sick/Personal

Full-time employees will also be eligible for sick/personal time, granted after 90 days of employment. This PTO can be used to receive paid time off for situations such as your own illness, the illness of children, doctor's appointment, etc. Eligibility begins the same as vacation time and follows the schedule below:

Status	Sick/Personal Hours
Full-Time Hourly	16

The maximum amount an hourly employee can have at any time is 16 hours. Once an employee uses any of this time, it will reset to the maximum granted at their anniversary date. Sick/personal time does not carry over or accrue. It is also not subject to payout at termination, retirement or other reason for leaving if all days are not used.

### **Procedures**

Vacation time is given up front, once an employee has completed 90 days of employment and has transferred to Kent Companies. All vacation time resets at the employee's anniversary date. If you choose to leave the company during your first year of employment or are terminated, used but unearned vacation time will be collected back on a pro-rated basis via your last payroll. If you choose to leave employment after one year, any unused but earned vacation pay will be paid to you via your last payroll check.

All employees (beginning from date of eligibility) that work less than 1900 hours in any given year will receive vacation pay according to the following formula:

$$\underline{\text{Number of hours worked}} \times \text{Earned vacation hours}$$

1900 hours

It is highly recommended that all PTO be preapproved by and prescheduled with the employee's supervisor and may be taken in hourly increments. Approval for all scheduled time away is subject to the needs of the division in which the employee works, and a 30-day notice is required for time is appreciated. We understand that emergencies can happen, so in these cases employees will be allowed to take unscheduled PTO with less than 24 hours' notice and regardless of applicable workload.

Because of the seasonal nature of our industry, employees with multiple weeks of vacation should take no more than one week off during the summer months (May 1-September 30).

A maximum of 40 hours of accrued vacation time may be carried over from one calendar year to the next. Any amount of vacation time over 40 hours that has not been used will be paid out to the employee within one week of their anniversary date.

### **Bereavement**

Kent Companies believes employees should have the necessary time needed to grieve the loss of a loved one. Bereavement leave will normally be granted unless there are unusual business needs or staffing requirements. An employee may, with his or her supervisor's approval, use any available vacation for additional time off as necessary.

Paid bereavement leave will be granted according to the following schedule:

- Employees are allowed up to three consecutive days off from regularly scheduled duty with regular pay in the event of the death of the employee's spouse, child, father, father-in-law, mother, mother-in-law, son-in-law, daughter-in-law, brother, sister, stepfather, stepmother, stepbrother, stepsister, stepson or stepdaughter.
- Employees are allowed one day off from regular scheduled duty with regular pay in the event of death of the employee's brother-in-law, sister-in-law, grandparent, grandchild or spouse's grandparent.
- It is at the managers' discretion to allow time as needed for additional losses, and any exceptions to the above granted time must be approved by executive management.

### **Jury Duty and Court Appearances**

Employees who are summoned to serve jury duty on scheduled workdays may use accumulated vacation time on the day that they are called to serve. Employees should show the summons notice to their supervisor in order to be excused from work on that day.

Any employee summoned to be in court for any other reason shall show the summons notice or subpoena to their supervisor and request the time off with as much notice as possible. Employees may use vacation pay for this purpose.

Of course, employees are expected to report for work whenever the court schedule permits

### **Holiday Pay**

Eight hours of pay will be paid to all KCI, full-time employees after 90 days of employment who meet the following criteria:

- Worked a full day on the last regular working day before the holiday.
- Has worked a full day on the first regular working day after the holiday.

The following are paid holidays recognized by the Company:

New Year's Day	Labor Day
Memorial Day	Thanksgiving Day
Independence Day	Christmas Day

Employees may also take unpaid time off to observe other religious holidays. You must notify your supervisor or manager one week before the desired day off.

## **Benefits**

### **Health Insurance**

Health insurance benefits are available to all eligible KCI full time employees after 90 days of employment. Group health and dental insurance for dependents is available for an additional charge. When you are eligible to receive this insurance, you will be given enrollment forms to complete and return to the office. Failure to complete and return the forms may cause the forfeiture and/or delay of your insurance coverage.

### **Dental Insurance**

If you sign up for health insurance, you are also eligible for insurance through Delta Dental. Details of your benefits through Delta Dental are available in your packet.

### **Vision Insurance**

Vision insurance is also available after 90 days of employment. Details of your benefits through VSP are available in your packet.

### **Life Insurance**

Each employee participating in the health insurance plan will also be eligible to receive \$10,000.00 in life insurance. Employees with family health insurance through the Company are eligible to receive \$2,000.00 life insurance for their spouse and \$1,000.00 for each dependent child over one year of age and under eighteen years of age. **It is your responsibility to notify the office of any beneficiary changes.**

### **Benefits Continuation (COBRA)**

The federal Consolidated Omnibus Budget Reconciliation Act (COBRA) gives employees and their qualified beneficiaries the opportunity to continue health insurance coverage under Kent Companies' health plan when a "qualifying event" would normally result in the loss of eligibility. Some common qualifying events are resignation, termination of employment, or death of an employee; a reduction in an employee's hours or a leave of absence; an employee's divorce or legal separation; and a dependent child no longer meeting eligibility requirements.

Under COBRA, the employee or beneficiary pays the full cost of coverage at Kent Companies' group rates plus an administration fee. Kent Companies provides each eligible employee with a written notice describing rights granted under COBRA when the employee becomes eligible for coverage under Kent Companies' health insurance plan. The notice contains important information about the employee's rights and obligations.

The covered employee or a family member is responsible for notifying Human Resources of a divorce, legal separation, or a child losing dependent status within 60 days of the loss of coverage due to the event. Failure to notify the Human Resources within 60 days will eliminate any rights to COBRA continuation. The employer/plan administrator will accept written notification only.

### **Flexible Spending Account**

All employees who are eligible for group insurance are also eligible to participate in this program. Essentially, this benefit allows you to pay for non-reimbursed healthcare expenses, dependent health insurance, medical costs (including prescription co-pays, non-prescription drugs), or some child-care costs with "before tax" dollars during the plan year. The result is a significant reduction in your income taxes. More details about this benefit are available in the office.

### **Direct Deposit**

For your convenience, Kent Companies can electronically deposit your paycheck for you each Friday into your account at any bank or credit union. Enrollment forms for direct deposit are available in the office.

### **Profit Sharing and 401(k) Savings Plan**

In keeping with the merit shop philosophy, all eligible employees of Kent Companies will receive a portion of the profits they help to generate each year. At the end of each fiscal year, the Board of Directors will examine the Company's financial statements and determine how much of the Company's profits, if any, will be contributed to this plan. This contribution will then be allocated to the eligible employees' accounts based on the ratio of the employee's wages to the total wages of all participants.

Kent Companies has established a 401(k) savings plan to provide employees the potential for future financial security for retirement. The 401(k) savings plan is the portion of this benefit that allows employees to make additional deposits into their accounts and take advantage of some significant tax breaks.

Employees become eligible to participate in this plan on the next enrollment date after they have worked at least 1000 hours during a consecutive twelve-month period. Enrollment dates are June 1 and December 1 of each year. Summary plan descriptions will be distributed to employees when they become eligible or upon request.

### **Workers' Compensation Insurance**

We provide a comprehensive workers' compensation insurance program at no cost to employees. This program covers any injury or illness sustained in the course of employment that requires medical, surgical, or hospital treatment. Subject to applicable legal requirements,

workers' compensation insurance provides benefits after a short waiting period or, if the employee is hospitalized, immediately.

Employees who sustain work-related injuries or illnesses should inform their supervisor immediately. No matter how minor an on-the-job injury may appear, it is important that it be reported immediately. This will enable an eligible employee to qualify for coverage as quickly as possible. Employees may report all injuries and accidents without fear of retaliation.

### **Tuition Reimbursement**

We encourage employees to grow and develop their skills through continuing education. If there is a training course you would like to pursue, discuss it with your supervisor or a manager. If your course is approved in advance in writing, Kent Companies will reimburse you for the tuition, provided that you meet the following eligibility criteria:

The employee must be employed by Kent Companies for a full year before beginning the class.

Courses must be pertinent to the employees' position and approved by the office in advance.

A minimum of a "B" or satisfactory grade must be achieved.

A copy of the tuition receipt and grade transcript must be submitted to the office when applying for reimbursement.

Occasionally, Kent Companies may pay in advance for certain educational classes, like the "ABC Apprenticeship" program. If you fail to complete the course, fail to receive a satisfactory grade, or are not employed at Kent Companies at the end of the course, you will be expected to reimburse Kent Companies for the tuition.

### **Employee Assistance Program**

The objective of the Employee Assistance Program (EAP) is to help reduce problems in the work force and to retain valued employees. We recognize that problems of a personal nature can have an adverse effect on an employee's job performance.

It is also recognized that most personal problems can be dealt with successfully when identified early and referred to appropriate care. The EAP provides these services through special arrangements with Employee Assistance Center. The program deals with the broad range of human problems such as emotional/behavioral, family and marital, alcohol and/or drug, financial, legal and other personal problems.

The program provides problem assessment, short term counseling and referral. Costs for services at an Employee Assistance Center office are covered by the employer. Costs incurred for referral services not covered by insurance or other benefits are the responsibility of the employee.

The policy for use of this program:

1. Management is concerned with how an employee's personal problems affect him/her as a person as well as how the employee's well-being influences his/her work performance.
2. This policy applies to all employees of the company no matter what their job title or responsibilities.
3. The program is available to employees, and their immediate family members, on a self-referral basis since problems at home can affect the job. If employees or family members have personal problems that may benefit from assistance, they are encouraged to use the program.
4. Participation in the program will not jeopardize an employee's job security, promotional opportunities or reputation.
5. All records and discussions of personal problems will be handled in a confidential manner. These records will be kept by the Employee Assistance Center and will not become a part of the employee's personnel file.
6. Employees will be encouraged to seek assistance to determine if personal problems are causing unsatisfactory job performance. If performance problems are corrected, no further action will be taken. If performance problems persist, the employee will be subject to normal corrective procedures.
7. All levels of management are responsible for using this program when appropriate to assist in resolving job performance problems related to personal problems.
8. Sick leave may be granted for treatment or rehabilitation on the same basis as for other health problems. Consideration will also be given for the use of annual leave or leave without pay if sick leave is not available.
9. This policy does not alter or replace existing administrative policy or contractual agreements, but serves to assist in their utilization.

### **ECHO (Employee Confidential Hotline Option)**

With a free call you can report problems or suggestions and no one will know who you are. The information you provide is passed along (echoed) to the management. The operators who handle your call will only relay information you want them to reveal. You do not even have to give your name to the operator. The ECHO Hotline toll free number is **1-888-440-ECHO (3246)**.

## **Policies**

### **Policy Enforcement**

Company policies as defined in this book are to be followed by all employees. Failure to do so may result in verbal and/or written reprimand. Repeated violation may result in time off without pay or dismissal.

### **Corrective Action**

Although your employment is at-will (either party may terminate the employment relationship at any time with or without cause or notice), violation of any policies and procedures of this handbook may result in corrective action. When performance problems occur, the usual steps of corrective action undertaken by **may** be coaching, verbal warning, written warning, and ultimately, termination of employment. These are guidelines and we may, at our discretion, skip any and all steps in the corrective action system or decide not to use the corrective action system at all. Furthermore, if you engage in misconduct deemed to be serious enough by the company we may, in our sole discretion, subject you to immediate termination without the administration of other, less severe corrective action. We also reserve the right to address any offense not specifically enumerated in this handbook in a manner commensurate with the

seriousness of the offense.

### **Safety Policies**

Kent Companies is committed to provide the most favorable condition or conditions for employee safety and health; in keeping with sound business practice and the requirements of the 1970 Occupational Safety and Health Act.

It is the policy of this Company to assure, so far as possible, that every employee has a safe and healthful place in which to work. It is also the policy of the Company to help each employee recognize his responsibilities to safe employment and require that he accept these responsibilities and work accordingly.

All new employees are required to view a safety video and introduction to company video during their orientation. The detailed safety policy is available for review upon request by any employee. All employees will be furnished with a summary safety manual (Basic Safety Rules for Construction).

### **Injury Reporting**

ALL Injuries, no matter how minor, must be reported to your foreman or crew leader. Your foreman or superintendent will direct you to an **approved** medical facility. Use only the company **approved** medical facility.

If your foreman believes that your injury requires medical treatment, it will be your responsibility to promptly go to the recommended **approved** medical clinic for treatment. If you have a question – **contact Carlton Aukeman 616-325-3598, Mindy Curtiss 616-902-5160 or Sarah Miller 616-822-5622.** If you, an injured employee, refuse treatment and the required drug screen, you will be in violation of Kent Companies Alcohol and Drug Abuse Policy for refusing to take a post-accident drug screen. If you, an injured employee, refuse treatment and later seeks medical treatment from an unapproved facility or emergency room, Kent Companies will deny any unauthorized claim and you will be billed personally for the treatment.

Assist the foreman in completing the Accident Investigation Report, including first aid treatment, the root cause of the accident and what can be done to prevent re-occurrences of the injury.

Kent Companies policy dictates that all employees with medical restrictions will be accommodated. Job superintendent and Corporate Safety Director will determine placement of restricted work employees.

### **Employee Classifications and Personal Tool Policy**

The following are the most often used employee classifications, and a list of each classification's minimum required personal hand tools. Your foreman will expect you to have these tools with you daily. Failure to do so will result in disciplinary action.

Normal wear and tear on personal tools is to be expected. The employee is expected to replace all worn, damaged, or missing personal tools at his own expense. Kent Companies will not be responsible for lost or stolen personal tools.

Kent Companies will provide all other tools necessary to perform your job. We do not expect you to use your own personal power tools on the job, and therefore we will not reimburse you for lost or damaged personal power tools used on the job.

All employees are required to wear sturdy leather work boots (steel toe are recommended), long pants and a shirt with minimum four (4) inch sleeves. You will be provided with an OSHA approved hard hat, safety vest and safety glasses (known as PPE) prior to your first day on the job. All PPE is required on all Kent Companies jobsites at all times.

## Concrete Divisions

### Laborer's Tools

1 20 oz. Hammer with holder	1 Wire Tie Twister (optional wire wheel if preferred)
1 25' Tape Measure	1 Sledge Hammer (6 or 8 lbs. hammer)
1 Pair of rubber boots	1 Pocket Knife
1 Pencil	1 Small Hand Scraper
1 Nail Apron/Tool bab	1 Flat Pry Bar
1 Pair of Gloves	

### Formsetter's Tools

1 20 oz. Hammer with holder	1 Wire cutting pliers
1 25' Tape Measure	1 Margin trowel (square)
1 Pair of rubber boots	1 Calcimine brush
1 Pencil	1 Hand stone
1 Nail Apron/ Tool Bag	1 Sponge (float)
1 Pair of gloves	1 Small pry bar
1 Pocket knife	1 Magnesium hand float
1 Small hand scraper	1 3lbs. Sledge hammer
1 Chalk box	1 Sledge hammer (6 or 8 lbs. hammer)
1 String line	1 Wire tie twister (optional wire wheel, if preferred)
1 Four (4) foot level	

### Finisher's Tools

1 20 oz. Hammer with holder	1 Margin trowel (square)
1 50' Steel tape measure	1 Calcimine brush
1 25' Tape measure	1 Hand stone
1 Pair of rubber boots	1 Sponge float
1 Pencil	12", 14", 16", 20" trowel in good usable condition
1 Nail Apron/Tool bag	1 Magnesium hand float
1 Pair of gloves	1 Jointer (1 1/4")
1 Pocket knife	1 Tin snips
1 Small hand scraper	1 Wire tie twisters (optional wire wheel, if preferred)
1 Chalk box	1 Wrench to fit power trowels (to change blades)
1 String line	
1 Four (4) foot level	
1 Wire pliers	

1/8", 1/4", 3/8", 1/2", 3/4" edgers

1 Sledge hammer (6 or 8 lbs. hammer)

### **Carpenter's Personal Tools**

In addition to the laborer's tools:

Speed square  
Framing square  
Four (4) foot level  
Two (2) foot level  
Hand saw  
Chalk line  
Set of screwdrivers  
2" Putty knife

Wire cutting pliers  
Crow bar  
Finish trowel  
Wood chisel  
String line  
Hack saw  
Coping saw  
Magnesium hand float

### **Foreman Tools**

Each foreman should carry tools as listed in the corresponding category depending on his present job, be it foundations, flatwork, carpentry, etc.

### **Pump Operators**

1 Pair of Rubber Boots  
1 Pair of gloves (leather preferred)  
1 Rain coat/ Rain suit

### **Gyp-Crete**

1 20 oz. Hammer with holder  
1 25' Tape measure  
1 Pair of rubber boots (optional)

1 Pair of gloves  
1 Rain coat/ Rain suit

### **Home Services – Mudjackers and Waterproofers**

1 Pair of gloves  
1 Pair of rubber boots (optional for waterproofers)  
1 Rain coat/ Rain suit (optional for waterproofers)

### **Polishers**

1 20 oz. Hammer with holder  
1 25' Tape Measure  
1 Pencil  
1 Nail Apron/ Tool Bag  
1 Pair of Gloves  
Set of screwdrivers

Set of adjustable wrenches  
1 Channel locks  
1 Pocket knife  
1 Set of knee pads  
Set of Allen wrenches

### **Pier Lifters**

1 20 oz. Hammer  
1 25' Tape Measure  
1 Pencil  
1 Tool Bag (optional)

1 Pair of Gloves  
1 Pair of rubber boots  
1 Lunch pail

### **Restoration**

1 Body Harness (see Div Mgr for specifics on harness)	
1 20 oz. Hammer	1 Pair of rubber boots
1 25' Tape Measure	1 Pencil
1 Tool Bag/ Tool bucket	1 Margin trowel
1 Pair of gloves	1 Needle nose pliers
1 Small level (2' or 4')	1 Channel locks
Set of screwdrivers	1 Caulk Gun
1 Small pry bar	1 Cresent wrench
1 Utility knife w/ blades	1 Wire brush

### **Special Tools**

Tools not standard on the pickup such as generators, vibrators, side grinders, zip-saws, etc. are available from the Company tool crib. These tools are to be checked out anytime between 6:00 a.m. and 5:00 p.m. by the person needing the tool. These tools are to be returned to the crib when not in use or no longer needed.

### **Asset and Material Disposal Policy**

All materials, tools, and equipment owned by Kent Companies may not be disposed of or used for any other purpose other than the pursuit of company business as provided by this policy. This policy also applies to unused or left over materials, tools, and equipment, as well as obsolete or "junk" materials, tools, and equipment. The following rules are in effect throughout all Kent Companies offices.

1. All worn out or broken equipment and tools will be returned to the location where they are stored when not in use.
2. All excess construction materials on jobsites that can be reused, repurposed, or recycled will be returned in an organized fashion to the shop. This includes plywood, resteel, vapor barrier, expansion joint, cures, form release, polishing diamonds, chemicals, and formwork.
3. Any deviation from the above rules can only be waived by the following individuals
  - a. KCI – Grand Rapids: Chris Fennema
  - b. KCI – Ohio: Josh McKenzie
  - c. KCI – Detroit: Dave Schoonbeck
  - d. KCSE: Dave Schoonbeck
  - e. KC Texas: Keith Collinsworth or Lance Ross

4. Any employees that deviate from this policy face disciplinary action up to and including dismissal.

### **Safety Glasses Policy**

All Kent Companies' employees are required to wear safety glasses that meet ANSI (Z87.1) Standards while on Kent Companies' job sites and while at any Kent Companies' yard or shop.

All employees will be issued clear safety glasses. If through normal usage, they become scratched or damaged they must be turned into their superintendent who will provide a new pair at no charge. Safety glasses that are abused or lost will be replaced and the employee will be charged a nominal fee.

Employees who need reading glasses will be provided with safety glasses that have insert lens built in (like bi-focals) for reading in various di-optor strengths.

Employees who need prescription eye glasses to safely function on the job site, have the following two options:

1. The company will provide them with a pair of oversize safety glasses designed to be worn over their prescription glasses.
2. The company will provide the employee with a voucher to RX Optical for a pair of single vision safety glasses complete with approved side shields. Employees can then select either the frames available in that price range or upgrade them at their own expense. The employee is responsible for bringing in a copy of his current eye glasses' prescription. The employee pays for any additional upgrades or bifocals. Employees are responsible for maintaining their glasses. Kent Companies will provide for replacement glasses once every two years. The employee covers the cost of replacements prior to the expiration of the two year period.

### **Nature of Employment**

Employment with Kent Companies is voluntarily entered into, and the employee is free to resign at will at any time, with or without cause. Similarly, we may terminate the employment relationship at will at any time, with or without notice or cause, so long as there is no violation of applicable federal or state law.

Policies set forth in this handbook are not intended to create a contract, nor are they to be construed to constitute contractual obligations of any kind or a contract of employment between the company and any of its employees. The provisions of the handbook have been developed at the discretion of management and, except for its policy of employment-at-will, may be amended or cancelled at any time, at the company's sole discretion.

These provisions supersede all existing policies and practices and may not be amended or added to without the express written approval of the CEO of Kent Companies.

### **Attendance and Punctuality**

To maintain a safe and productive work environment, we expect employees to be reliable and to be punctual in reporting for scheduled work. Absenteeism and tardiness place a burden on other employees and on the company. In the rare instances when employees cannot avoid being late to work or are unable to work as scheduled, they should notify their supervisor as soon as possible in advance of the anticipated tardiness or absence. Employees that fail to notify their supervisor and do not come to work as scheduled are considered a no-show, no-call. Employees that have three consecutive no-call, no-shows will be considered to have resigned from their position.

Poor attendance and excessive tardiness are disruptive. Either may lead to corrective action per the company policy.

### **Employment Eligibility**

Kent Companies complies with the Immigration Reform and Control Act of 1986, as amended, and other federal laws that require employers to verify that all employees are authorized to work in the United States, regardless of citizenship. All new employees are required to complete an Employment Eligibility Verification form (Form I-9) and produce documents establishing identity and authorization to work at the time of hire.

### **Equal Employment Opportunity Policy**

Kent Companies is an equal opportunity employer and complies with all federal and state laws prohibiting discrimination. It is Kent Companies' policy that no person, on the basis of race, sex, color, religion, national origin, age, marital status, disability, veteran status, height, weight, genetic information, or other factors prohibited by law shall be discriminated against in employment. Kent Companies will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship.

The Company will strive to ensure that all employees and prospective employees will be treated equally in regards to recruitment, employment, promotions, demotions, discipline, termination, access to benefits and training, and layoffs. The Company will further ensure that its management staff is aware of the Company's commitment to this policy and each member understands their individual roll in the process of administering this plan.

Any employee, or prospective employee, should feel free to address any concern regarding discriminatory action to any corporate officer without fear of reprisal. Anyone engaging in any type of unlawful discrimination shall be subject to disciplinary action, up to and including termination of employment.

### **Employee Performance Evaluation Policy**

Employees will receive an evaluation at 75 days, and then annually thereafter. Reviews are completed in October of each year. Employees may request that they receive a written performance evaluation by notifying their supervisor.

## **Personal Status**

It is the responsibility of each employee to promptly notify Kent Companies of any changes in personnel data. Phone numbers, mailing addresses, marital status, number and names of dependents, income tax exemptions, individuals to be contacted in the event of an emergency, or any other status updates should be kept accurate and current at all times. Just contact the office with any updates.

## **Problem Resolution**

We expect all employees to be treated fairly and properly paid. If you are dissatisfied for any reason, you are encouraged to bring concerns or complaints about work-related situations to the attention of your supervisor/division manager, or executive management if related directly to your direct supervisor. Every effort will be made to resolve problems fairly, equitably, and promptly.

## **Social Security Number Privacy**

Kent Companies will ensure to the extent practicable the confidentiality of social security numbers held by the Company. Social security numbers will not be disclosed to those outside of the Company, except as authorized by the Social Security Number Privacy Act. Access to information or documents that contain social security numbers will be limited to those requiring access for legitimate business reasons.

Social security numbers may be used in the ordinary course of business. No more than four sequential digits of a social security number will be publicly displayed, used as an account number, password, or identifier, or included in or on any document sent outside the Company unless applicable law requires, permits, or authorizes that the social security number appear in the document. Documents that are no longer needed that contain social security numbers must be shredded. Under no circumstances should any document with all or any portion of a social security number be disposed of without first being shredded.

Violation of this policy may result in discipline, up to and including dismissal. Employees who violate the Social Security Number Privacy Act also may be subject to fines and imprisonment.

## **Gift Policy**

Kent Companies strives to maintain high standards of ethical conduct when dealing with business associates, vendors, potential vendors and customers. This policy will provide guidance to employees when receiving or accepting gifts on behalf of the company.

### **Gifts, Favors, and Payments by the Company**

Gifts, favors, and payments may be given in the course or as consequence of association with the company, if they meet all of the following criteria:

- They are consistent with accepted business practices.
- They are of sufficiently limited value and in a form that will not be construed as a bribe or payoff.
- They are not in violation of applicable law and generally accepted ethical standards.
- Public disclosure of the facts will not embarrass the Company.

Payments, commissions or other compensation to or for the benefit of associates of customers (or their family members or associates) are contrary to this and other company policies.

### **Gifts, Favors, Entertainment and Payments Received by Company Employees**

Employees shall not seek or accept for themselves or others any gifts, favors, entertainment, payments without a legitimate business purpose nor shall they seek or accept personal loans (other than conventional loans at market rates from lending institutions) from any persons or business organizations that do or seek to do business with the Company. In the application of this policy:

Employees may accept for themselves and members of their families' common courtesies usually associated with customary business practices. These include but are not limited to:

- Lunch and/or dinner with vendors sometimes including spouses as long as the invitation is extended by the vendor.
- Gifts of small value from vendors such as calendars, pens, pads, knives, etc.
- Tickets to events (such as sports, arts, etc.) are acceptable if offered by the vendor and the vendor accompanies the associate to the event. These are not to be solicited and must be approved by the appropriate company officer.
- Overnight outings are acceptable under the condition that individuals from either other companies or the vendor are in attendance. The employee must have prior approval from the appropriate company officer.
- Gifts of perishable items usually given during the holidays such as hams, cookies, nuts, etc., are acceptable.

A strict standard is expected with respect to gifts, services, discounts, entertainment or considerations of any kind from suppliers, vendors, subcontractors, customers or perspective suppliers.

- Outings such as golf, fishing, and hunting are acceptable with prior approval from the appropriate company official. The vendor must be in attendance.
- Use of vendor's facilities (vacation homes, etc.) by employees or families for personal use is prohibited. In the event the vendor is present for the duration of the visit such a situation is acceptable as long as it is only once per year and for limited duration. The employee must have prior approval from the appropriate company officer.
- It is never permissible to accept a gift in cash or cash equivalent such as stocks or other forms of marketable securities of any amount.

### **Cell Phone/iPad Allotment and Allowance Policy**

Employees whose job duties include the frequent need for a cell phone may receive extra compensation, in the form of a company provided cell phone or cell phone allowance, as determined by the company. No further reimbursement for cell phone costs is available to employees who receive such a cell phone or an allowance.

As a general rule, cell phones should not be selected as an alternative to other means of communication -- e.g., land-lines, pagers, and radio phones -- when such alternatives would provide adequate but less costly service to the company.

## Cell Phone Allowance:

- a) **Eligibility:** Employees eligible for cell phones or an allowance generally include division managers, superintendents, foremen, and full-time employees whose job duties regularly require emergency call back, irregular work hours or other job related factors that require the employee to routinely utilize a cell phone to enhance their ability to perform their job duties. Division Leaders shall recommend which employees within their departments qualify for a cell phone or an allowance. The Corporate Operations Manager or Corporate HR Director shall give final approval on all cell phone arrangements.
- b) **Allowance Amount:** In the case of allowance, the standard monthly cell phone allowance amount shall be \$25.00, with an option to adjust to a higher rate, as determined by the Corporate Operations Manager or appropriate Corporate HR Director. No further reimbursement for cell phone costs is available to employees who receive a cell phone allowance.
- c) **Allowance Payment:** The approved cell phone allowance will be paid monthly as part of the employee's paycheck. This allowance does **not** constitute an increase to base pay, and will **not** be included in the calculation of percentage increases to base pay due to salary increases, promotions, etc.

**Employee Responsibilities:** Employees utilizing an allowance must retain an active cell phone contract as long as a cell phone allowance is in place. The employee must provide their Division Leader and Kent Companies IT Department with their current cell phone number and immediately notify both parties if the number changes. Employees receiving a cell phone allowance are expected to carry the cell phone on their person both on and off hours and respond when called for business.

If available from the company contracted cellular service provider, employees may be able to take advantage of discounts for their personal service plans if they utilize the same provider as the company.

Because the employee who receives an allowance owns the cell phone personally, the employee may use the phone for both business and personal purposes, as needed. Use of the phone in any manner contrary to local, state, or federal laws will constitute misuse, and will result in immediate termination of the cell phone allowance. Any data overages (data usage can be discussed with appropriate division manager) may be required to be paid back to the company through payroll deduction depending on the reasons for the overage. Each situation will be handled on a case by case basis.

If, prior to the end of the cell phone contract, a personal decision by the employee, or employee misconduct, or misuse of the phone, results in the cell phone allowance being discontinued or the need to end or change the cell phone contract, the employee will bear the cost of any fees associated with that change or cancellation. For example, if an employee resigns, and no longer wants to retain the current cell phone contract for personal purposes, any cancellation charges will be the employee's responsibility. At the time the equipment is returned, it is also required that any accessories be returned as well (chargers for example).

If an employee misuses a phone and their benefit is relinquished, or if an employee leaves employment (either voluntarily or involuntarily), it is required that the employee unlock the phone before submitting it to their direct supervision or an IT representative. If Kent Companies is unable

to access the phone contents, the employee may have the full value of the phone deducted from their last paycheck.

Anything above and beyond the standard plan is at the expense of the employee, and said employee relinquishes any rights to be reimbursed for those expenditures (upgraded phone fee, insurance costs, etc.)

**Replacement of lost phone:** Employees who lose/damage their cell phones may be responsible for the replacement costs associated with the loss. Each situation will be handled on a case by case basis, with final approval being determined by the Corporate Operations Manager or appropriate Corporate HR Director based on the circumstances surrounding the loss/damage.

**Additional phone accessories:** Employees are responsible for protecting their company issued cell phones with the use of phone cases, screen protectors, etc. and are offered discounts through our cell phone provider(s). Any exceptions to this must be approved by the Corporate Operations Manager or appropriate Corporate HR Director.

### **Electronic Device Usage/Driving Policy**

Kent Companies issues or pays individual cellular phones/IPads to company representatives who are required to be in close contact with the company at all times. While electronic devices are a necessary convenience of the business world, we require that our employees follow the guidelines listed below for their own and others safety.

It is Kent Companies policy that representatives of our organization who are issued a cellular phone/IPad understand the devices are issued for business use. All employees are required to be professional and conscientious at all times when using company issued electronic devices.

Employees are expected to make every effort to not exceed the current contracted allowed minutes. Cellular bills are reviewed when they arrive, any employee who exceeds their contracted allowed minutes is subject to additional usage review.

### **Driving:**

In order to comply with the new federal regulations for Commercial Motor Vehicle (CMV) drivers banning the use of hand held phones while driving, and to minimize the effects of "Distracted Driving," the following rules will apply to all Kent Companies' employees that are:

- Operating a vehicle owned, leased or rented by the Company.
- Operating a personal motor vehicle while conducting Company business.

While operating a motor vehicle, employees are prohibited from using cellular telephones or mobile electronic devices to read or write email or text messages. Employees may not use their hand-held phone to initiate outgoing calls or answer incoming calls while operating any vehicle while performing company business.

Employees are prohibited from making or receiving calls on their hand-held phone unless they are using a hands-free device. Hands-free devices must be capable of answering a call by touching a single button. Initiating a call must be completed utilizing voice activated calling.

If employees are unable to use a hands-free device, they are to look for the nearest, safe area to pull off the road before initiating or returning any phone calls/e-mails/texts. We encourage no phone usage while driving.

Kent Companies reserves the right to amend or alter the terms of this policy.

### **Smoking**

In keeping with the company's intent to provide a safe and healthful work environment, smoking is prohibited throughout the workplace. This policy applies equally to all employees, customers, and visitors.

### **Social Media Policy**

At Kent Companies, we understand that social media can be a fun and rewarding way to share your life and your work with family, friends and colleagues around the world. It is also an important communications channel that connects Kent Companies with external audiences and stakeholders. However, use of social media also presents certain risks and carries with it certain responsibilities. This policy applies to all associates who work for Kent Companies or one of its subsidiary companies in the United States.

#### **Objectives**

- To ensure that all official Kent Companies social media content adheres to industry standards for safety and proper worksite operations.
- To ensure that the official Kent Companies social media channels reflect the mission and the values of the organization with a consistent voice.
- To establish practical, reasonable and enforceable guidelines for the use of social media by Kent Companies employees.

#### **Employee Guidelines**

*Social media* includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else's web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or a chat room, whether or not associated or affiliated with Kent Companies, as well as any other form of electronic communication.

The same principles and guidelines found in the Kent Companies employment handbook and three basic beliefs apply to your activities online.

- Ultimately, you are solely responsible for what you post online.
- Before creating online content, consider some of the risks and rewards that are involved.
- Keep in mind that any of your conduct that adversely affects your job performance, the performance of fellow associates or otherwise adversely affects members, customers, suppliers, people who work on behalf of Kent Companies or Kent's legitimate business interests may result in disciplinary action up to and including termination.

#### **Be Respectful**

Always be fair and courteous to fellow associates, customers, members, suppliers or people who work on behalf of Kent Companies.

### **Be Honest and Accurate**

Make sure you are always honest and accurate when posting information or news, and if you make a mistake, correct it quickly. Be open about any previous posts you have altered. Remember that the Internet archives almost everything; therefore, even deleted postings can be searched. Never post any information or rumors that you know to be false about Kent Companies, fellow associates, members, customers, suppliers, people working on behalf of Kent Companies or competitors.

### **Post Only Appropriate and Respectful Content**

- Uphold the Four Hallmarks: Safety, Productivity, Quality and Customer Service in all social media activities.
- Maintain the confidentiality of Kent Companies trade secrets and private or confidential information. Trade secrets may include information regarding the development of systems, processes, products, know-how and technology.
- Do not post internal reports, policies, procedures or other internal business-related confidential communications.
- Do not create a link from your blog, website or other social networking site to a Kent Companies website without identifying yourself as a Kent Companies associate.
- Express only your personal opinions. Never represent yourself as a spokesperson for Kent Companies. If Kent Companies is a subject of the content you are creating, be clear and open about the fact that you are an associate, and make it clear that your views do not represent those of Kent Companies, fellow associates, members, customers, suppliers or people working on behalf of Kent Companies. If you do publish a blog or post online related to the work you do or subjects associated with Kent Companies, make it clear that you are not speaking on behalf of Kent Companies. It is best to include a disclaimer such as, "The postings on this site are my own and do not necessarily reflect the views of Kent Companies."

### **Using Social Media at Work**

Refrain from using social media while on work time or on equipment we provide, unless it is work-related as authorized by your manager or consistent with the Company Equipment Policy. Do not use Kent Companies email addresses to register on social networks, blogs or other online tools utilized for personal use.

### **Media Contacts**

Associates should not speak to the media on Kent Companies' behalf without contacting the Marketing Department. All media inquiries should be directed to them.

### **For More Information**

If you have questions or need further guidance, please contact your HR representative.

### **Alcohol and Drug Abuse Policy**

It is Kent Companies' desire to take reasonable steps to ensure that the use of alcohol and/or drugs does not jeopardize the safety of our employees, subcontractors and customers.

No principal, employee, or sub-contractor shall sell, distribute, be under the influence of, or in possession of any form of alcohol or illegal drug:

- while on a Kent Companies' job site
- while driving or operating any Kent Companies' vehicle or equipment
- while on Kent Companies' property.

Any employee who is under the care and supervision of a qualified licensed practitioner and taking a prescription drug that has the capacity to alter mood, perception, or judgment must immediately notify his or her supervisor. The employee will be allowed to work on Kent Companies' job sites, if Kent Companies determines that the medication will not inhibit the employee's ability to perform his or her regular assigned duties safely and efficiently. Failure to notify the Kent Companies' supervisor will result in immediate removal from the job site.

Drugs (as used in this policy) shall include any substance capable of altering mood, perception, or judgment, including but not limited to, Amphetamines, Cannabinoids, Cocaine, Opiates and Phencyclidines.

Possessing, using, or being impaired by "medical marijuana" on company property or in the course of any work-related activity is strictly prohibited.

By accepting employment with Kent Companies or any of its subsidiaries, employees grant their implied consent to be tested for drugs and alcohol at the Company's convenience, under any of the following conditions. As part of the testing procedure, employees will be required to sign a "Consent & Release" form. Any employee who refuses to sign the consent and release form and/or to cooperate and submit to such breathalyzer, urine, oral fluids, and/or blood testing as directed by the Company will be immediately discharged.

All employees will be required to pass an alcohol and drug screen prior to becoming a full-time, Kent Companies employee.

Any employee who operates heavy equipment (i.e.; trucks, cranes, lifts, loaders, and earth moving equipment) will be subject to frequent and random testing. All CDL licensed drivers will in the pool for MDOT administered random drug screening program.

All employees receiving medical treatment at either a med center or emergency room for a job related injury or sickness will be tested for drugs and/or alcohol. Any employee involved in an accident, injury or near-miss accident where there is reasonable basis for believing the employee contributed to the incident will be required to submit for a drug and/or alcohol screen.

An alcohol and drug test may be required where there is an objective basis for believing that the employee has used, possessed, sold, distributed, or been under the influence of alcohol or non-medically prescribed drugs.

The Company will maintain a pool of all active Kent Companies employees and once each month or as the Company determines, a percentage of the pools eligible names will be drawn. Those selected employees will be required to submit to testing as directed by the Company.

Any employee who fails a Company required alcohol or drug screen will be immediately terminated.

After a minimum suspension of twenty-eight (28) days, any employee terminated under the terms of Kent Companies Alcohol and Drug Abuse Policy may petition the Company for re-employment. If a suitable position compatible with the employee's skills is available and the Company deems

it in its best interest to re-hire the terminated employee, an offer of employment will be extended. At his/her own expense, the employee will be required to take an alcohol and drug screen at a Company approved facility. If that test is negative and it has been less than six months from the date of termination, the employee will be reinstated as a Kent Companies' employee without a break in service. Reinstated employees will be subject to additional testing at the Company's discretion. If a reinstated employee fails a subsequent test said employee will be immediately and permanently terminated.

An employee who has never been disciplined by the Company for any offense related to the use, sale, distribution, dispensation, manufacture, or possession of alcohol or a controlled substance may seek the Company's assistance for treatment of his/her alcohol and/or drug use problem. The Company shall attempt to refer the employee to appropriate medical treatment and counseling, and shall grant the employee a leave of absence, if necessary, to undertake such rehabilitative treatment. Employees requesting voluntary rehabilitation are still subject to the terms of this policy. Employees who are granted such leave of absence will be required by the Company to successfully complete a return to service medical examination, including alcohol and/or drug testing. Employees returning to work under this policy will be subject to periodic or random alcohol and/or drug testing, as a condition of reinstatement to work.

### **Family and Medical Leave**

Under the Family and Medical Leave Act of 1993 (FMLA), eligible employees may take unpaid, job-protected leave for certain family-related, medical or military-related reasons. As described below, leave entitlements vary depending upon the reason for the leave. Eligible employees are those who have worked for Kent Companies for at least twelve (12) months, have worked 1,250 hours in the twelve-month period before the leave is to begin, and who work within 75 miles of at least forty-nine (49) other company employees. Leave is tracked according to a twelve-month period. Except as provided below, the 12-month period we use for tracking FMLA leave looks backward 12 months from the date any leave is taken.

Family Leave and Medical Leave: Up to 12 weeks of leave may be taken for any one, or a combination, of the following circumstances:

1. To care for the employee's child after birth, or placement for adoption or foster care;
2. To care for a spouse, child or parent who is suffering from a serious health condition;
3. For incapacity due to pregnancy, prenatal medical care of child birth;
4. For an employee's own serious health condition which prevents the employee from performing his or her job;
5. For any qualifying exigency arising out of the fact that the employee's spouse, son, daughter, or parent is a military member on covered active duty; or
6. To care for a covered service member with a serious injury or illness if the employee is the spouse, son, daughter, parent, or next of kin of the service member.

Regardless of the reason(s) for the leave, the maximum amount of leave for these categories is 12 weeks in a 12-month period. Where medically necessary, leave due to a serious health condition may be taken on a reduced schedule or intermittent basis. Leave due to the birth, adoption or placement of a child may only be taken on a reduced schedule or intermittent basis with prior approval. New child leave must be completed within 12 months of the birth, adoption or placement. Where an employee takes leave for planned medical treatment or on an intermittent or reduced schedule basis, the employee must attempt to work with the company to schedule such leave so as not to disrupt the company's operations.

A “serious health condition” is an illness, impairment or physical or mental condition that involves either an overnight stay in a medical care facility or continuing treatment by a health care provider, and that prevents you from performing the functions of your job or a family member from participating in school or other daily activities. Subject to the requirements of the FMLA, continuing treatment involves a period of incapacity of more than three (3) consecutive calendar days combined with at least two (2) visits to a health care provider or one (1) visit plus a regimen of continuing treatment. It also includes pregnancy and prenatal care, certain chronic conditions, and other conditions that meet the FMLA’s requirements.

Military-Related Leave: Employees may take up to twelve (12) weeks of leave because of a “qualifying exigency” arising out of the fact that a spouse, parent or child of the employee is on covered active duty or has been notified of an impending call or order to covered active duty. Qualifying exigencies must relate to the active duty or call or order to active duty and include such things as: short notice deployment, attending military events and related activities, certain childcare and related activities, care of the military member’s parent who is incapable of self-care, making or updating financial and legal arrangements, attending counseling, rest and recuperation, and certain post-deployment activities. Leave may be taken in a single block of time, intermittently, or on a reduced-schedule basis.

Eligible employees may take up to twenty-six (26) weeks of leave to care for a family member (spouse, child, parent or next of kin) who is a current member of the Armed Forces (including the National Guard or Reserves) or a veteran of the Armed Forces discharged within the five-year period before the family member first takes leave and who is undergoing medical treatment recuperation or therapy, is in outpatient status, or is otherwise on the temporary disability retired list, for a serious injury or illness incurred in the line of duty on active duty. A veteran who was dishonorably discharged does not meet the definition of a covered service member. Leave under this category may only be taken during a single twelve-month period beginning from the first date of leave. Leave may be taken in a single block of time, intermittently, or on a reduced-schedule basis.

Total Leave Entitlement: Leave taken for all categories of family, medical and military leave will be combined toward the applicable 26-week or 12-week entitlements outlined in this policy. Where a husband and wife both work for the Company, they will be limited to a combined 12 or 26 weeks of leave due to birth, adoption or placement of a child for foster care, to care for a parent with a serious health condition, or to care for a family member with serious injury or illness arising out of their military service.

Notification & Certification of Need for Leave: When practical, employees are required to give Kent Companies at least thirty (30) days notice of the need for leave. When the need for leave becomes known less than thirty (30) days in advance, you are required to notify the company promptly when the need for leave becomes known. Subject to the above, you must generally comply with normal absence notification procedures. Failure to provide timely notice may result in your leave being delayed. When the need for leave is unforeseeable, you or someone on your behalf must notify the Company as soon as possible. Please provide as much information as possible about the reason for leave so that we can properly and timely determine whether your leave qualifies under this policy. Calling in “sick” is not sufficient. If your leave has already been approved and you subsequently need time off for that same reason, you must specifically inform us that you are taking leave for that reason or tell us that you are taking “FMLA leave.”

When the need for leave is military-related or due to a serious health condition (the employee’s

or a family member's), you will be required to provide certification of the need for leave and its duration on a form supplied by the company. Generally, this certification must be completed and returned to the company within fifteen (15) days of when it was provided to you. Kent Companies is not responsible for any charges incurred for completing the certification forms. While off work on leave, verification of continued need for leave and intent to return may also be requested. Failure to provide timely notice or the required certification may result in the leave being delayed or denied, or your absences being counted against our attendance policy or standards.

**Employer Notice:** If you request leave, you will be informed whether you are eligible under the FMLA. If you are, the notice will specify any additional information required as well as your rights and responsibilities. If you are not eligible, you will be given a reason for the ineligibility. You will also be informed if leave will be designated as FMLA leave and if known, the amount of leave counted against your total leave entitlement. If the company determines that the leave is not covered by the FMLA, you will be notified of this determination.

**Benefits:** Group health plan benefits are continued during FMLA leave. To maintain health care coverage during an approved leave, you must continue to pay the regular required employee contribution. If you fail to make the required contributions, health care coverage may be terminated and you will be allowed to continue coverage under COBRA. Employees who fail to return from an FMLA leave or who terminate within thirty (30) days of returning may be required to reimburse the company for any insurance premiums paid on their behalf during a leave. Non-health benefits will not be continued during a FMLA leave. You will not lose any benefit that was earned prior to your leave.

In certain circumstances, disability benefits or workers' compensation benefits may be available during FMLA leave. You will also be required to use any available paid time off (e.g., vacation, sick days, etc.) during an otherwise unpaid FMLA leave, subject to the terms of the paid time off policies. Employees on FMLA leave will not receive pay for holidays while they are on leave.

**Other Requirements:** Employees may not engage in any work (whether for another employer or self-employed) while on a leave of absence under this policy. Employees returning from a leave due to their own serious health condition may be required to provide the company with a fitness for duty certification. Employees who return from leave within the allowed time limits will be reinstated to their same or an equivalent position with the company, with equivalent pay, benefits and other employment terms. The company may deny reinstatement to certain "key employees" consistent with the FMLA guidelines.

Additional information about FMLA can be found on posted notices in designated employee areas or from the Corporate Human Resources Director.

### **Military Leave**

A military leave of absence will be granted to employees who are absent from work because of service in the U.S. uniformed services in accordance with the Uniformed Services Employment and Reemployment Rights Act (USERRA). Advance notice of military service is required, unless military necessity prevents such notice or it is otherwise impossible or unreasonable.

Contact the Human Resources Department for more information or questions about military leave.

## **Disability Accommodation**

We are committed to complying with all applicable provisions of the Americans with Disabilities Act ("ADA"). It is our policy not to discriminate against any qualified employee or applicant with regard to any terms or conditions of employment because of such individual's disability or perceived disability so long as the employee can perform the essential functions of the job. Consistent with this policy of nondiscrimination, we will provide reasonable accommodations to a qualified individual with a disability, as defined by the ADA, who has made the company aware of his or her disability, provided that such accommodation does not constitute an undue hardship.

Employees with a disability who believe they need a reasonable accommodation to perform the essential functions of their job should contact the Corporate Human Resources Director. We encourage individuals with disabilities to come forward and request reasonable accommodation.

Under the Michigan Persons with Disabilities Civil Rights Act, an individual needing accommodation for employment must notify the employer, in writing, of the need for such accommodation within 182 days after the individual knew or should have known that the accommodation was needed.

We will determine the feasibility of the requested accommodation considering various factors, including, but not limited to the nature and cost of the accommodation, the availability of tax credits and deductions, outside funding, the company's overall financial resources and organization, and the accommodation's impact on the operation of the company, including its impact on the ability of other employees to perform their duties and on the company's ability to conduct business. The ADA does not require us to make the best possible accommodation, to reallocate essential job functions, or to provide personal use items (i.e., eyeglasses, hearing aids, wheelchairs etc.).

An employee or job applicant who has questions regarding this policy or believes that he or she has been discriminated against based on a disability should notify the Corporate Human Resources Director. All such inquiries or complaints will be treated as confidential to the extent permissible by law.

## **Anti-harassment policy and complaint procedure**

### **Purpose**

Kent Companies strives to create and maintain a work environment in which people are treated with dignity, decency and respect. The environment of the company should be characterized by mutual trust and the absence of intimidation, oppression and exploitation. Employees should be able to work and learn in a safe, yet stimulating atmosphere. The accomplishment of this goal is essential to the mission of the company. For that reason, Kent Companies will not tolerate unlawful discrimination or harassment of any kind. Through enforcement of this policy and by education of employees, the company will seek to prevent, correct and discipline behavior that violates this policy.

All employees, regardless of their positions, 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 on the seriousness of the offense, disciplinary action may include verbal or written reprimand, suspension or termination of employment.

### **Prohibited Conduct Under This Policy**

Kent Companies, in compliance with all applicable federal, state and local anti-discrimination and harassment laws and regulations, enforces this policy in accordance with the following definitions and guidelines:

#### **Discrimination**

It is a violation Kent Companies policy to discriminate in the provision of employment opportunities, benefits or privileges; to create discriminatory work conditions; or to use discriminatory evaluative standards in employment if the basis of that discriminatory treatment is, in whole or in part, the person's race, color, national origin, age, religion, disability status, gender, sexual orientation, gender identity, genetic information or marital status.

Discrimination of this kind may also be strictly prohibited by a variety of federal, state and local laws, including Title VII of the Civil Rights Act 1964, the Age Discrimination Act of 1975, and the Americans with Disabilities Act of 1990. This policy is intended to comply with the prohibitions stated in these anti-discrimination laws.

Discrimination in violation of this policy will be subject to disciplinary measures up to and including termination.

#### **Harassment**

Kent Companies prohibits harassment, including sexual harassment, of any kind, and will take appropriate and immediate action in response to complaints or knowledge of violations of this policy. For purposes of this policy, harassment is any verbal or physical conduct designed to threaten, intimidate or coerce an employee, co-worker or any person working for or on behalf of Kent Companies. Verbal taunting (including racial and ethnic slurs) that, in the employee's opinion, impairs his or her ability to perform his or her job is included in the definition of harassment.

The following examples of harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy:

- Verbal harassment includes comments that are offensive or unwelcome regarding a person's nationality, origin, race, color, religion, gender, sexual orientation, age, body, disability or appearance, including epithets, slurs and negative stereotyping.
- Nonverbal harassment includes distribution, display or discussion of any written or graphic material that ridicules, denigrates, insults, belittles or shows hostility, aversion or disrespect toward an individual or group because of national origin, race, color, religion, age, gender, sexual orientation, pregnancy, appearance, disability, sexual identity, marital or other protected status.

#### **Sexual harassment**

Sexual harassment is a form of unlawful employment discrimination under Title VII of the Civil Rights Act of 1964 and is prohibited under Kent Companies anti-harassment policy. According to

the Equal Employment Opportunity Commission (EEOC), sexual harassment is defined as “unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature . . . when . . . submission to or rejection of such conduct is used as the basis for employment decisions . . . or such conduct has the purpose or effect of . . . creating an intimidating, hostile or offensive working environment.

There are two types of sexual harassment:

- “Quid pro quo” harassment, where submission to harassment is used as the basis for employment decisions. Employee benefits such as raises, promotions and better working hours are directly linked to compliance with sexual advances. Therefore, only someone in a supervisory capacity (with the authority to grant such benefits) can engage in quid pro quo harassment. Examples: A supervisor promising an employee a raise if she goes on a date with him; a manager telling an employee she will fire him if he does not have sex with her.
- “Hostile work environment,” where the harassment creates an offensive and unpleasant working environment. A hostile work environment can be created by anyone in the work environment, whether it be supervisors, other employees or customers. Hostile environment harassment consists of verbiage of a sexual nature, unwelcome sexual materials or even unwelcome physical contact as a regular part of the work environment. Texts, e-mails, cartoons or posters of a sexual nature; vulgar or lewd comments or jokes; or unwanted touching or fondling all fall into this category.

Sexual harassment occurs when unsolicited and unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature:

- Is made explicitly or implicitly a term or condition of employment.
- Is used as a basis for an employment decision.
- Unreasonably interferes with an employee’s work performance or creates an intimidating, hostile or otherwise offensive environment.

Sexual harassment may take different forms. The following examples of sexual harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy:

- Verbal sexual harassment includes innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions, lewd remarks and threats; requests for any type of sexual favor (this includes repeated, unwelcome requests for dates); and verbal abuse or “kidding” that is oriented toward a prohibitive form of harassment, including that which is sexual in nature and unwelcome.
- Nonverbal sexual harassment includes the distribution, display or discussion of any written or graphic material, including calendars, posters and cartoons that are sexually suggestive or show hostility toward an individual or group because of sex; suggestive or

insulting sounds; leering; staring; whistling; obscene gestures; content in letters and notes, facsimiles, e-mail, photos, text messages, tweets and Internet postings; or other form of communication that is sexual in nature and offensive.

- Physical sexual harassment includes unwelcome, unwanted physical contact, including touching, tickling, pinching, patting, brushing up against, hugging, cornering, kissing and fondling and forced sexual intercourse or assault.

Courteous, mutually respectful, pleasant, noncoercive interactions between employees, including men and women, that are appropriate in the workplace and acceptable to and welcomed by both parties are not considered to be harassment, including sexual harassment.

### **Retaliation**

No hardship, loss, benefit or penalty may be imposed on an employee in response to:

- Filing or responding to a bona fide complaint of discrimination or harassment.
- Appearing as a witness in the investigation of a complaint.
- Serving as an investigator of a complaint.

Retaliation or attempted retaliation in response to lodging a complaint or invoking the complaint process is a violation of this policy. Any person who is found to have violated this aspect of the policy will be subject to sanctions up to and including termination of employment.

### **Consensual Romantic or Sexual Relationships**

Kent Companies strongly discourages romantic or sexual relationships between a manager or other supervisory employee and his or her staff (an employee who reports directly or indirectly to that person) because such relationships tend to create compromising conflicts of interest or the appearance of such conflicts. In addition, such a relationship may give rise to the perception by others that there is favoritism or bias in employment decisions affecting the staff employee. Moreover, given the uneven balance of power within such relationships, consent by the staff member is suspect and may be viewed by others or, at a later date, by the staff member as having been given as the result of coercion or intimidation. The atmosphere created by such appearances of bias, favoritism, intimidation, coercion or exploitation undermines the spirit of trust and mutual respect that is essential to a healthy work environment. If there is such a relationship, the parties need to be aware that one or both may be moved to a different department, or other actions may be taken.

If any employee of Kent Companies enters into a consensual relationship that is romantic or sexual in nature with a member of his or her staff (an employee who reports directly or indirectly to him or her), or if one of the parties is in a supervisory capacity in the same department in which the other party works, the parties must notify the human resource director or other appropriate corporate officer. Because of potential issues regarding quid pro quo harassment, Kent Companies has made reporting mandatory. This requirement does not apply to employees who do not work in the same department or to parties who do not supervise or otherwise manage responsibilities over the other.

Once the relationship is made known to Kent Companies, the company will review the situation with human resources in light of all the facts (reporting relationship between the parties, effect on

co-workers, job titles of the parties, etc.) and will determine whether one or both parties need to be moved to another job or department. If it is determined that one party must be moved, and there are jobs in other departments available for both, the parties may decide who will be the one to apply for a new position. If the parties cannot amicably come to a decision, or the party is not chosen for the position to which he or she applied, the parties will contact human resources, which will decide which party should be moved. That decision will be based on which move will be least disruptive to the organization as a whole. If it is determined that one or both parties must be moved, but no other jobs are available for either party, the parties will be given the option of terminating their relationship or resigning.

### **Complaint Process**

Kent Companies will courteously treat any person who invokes this complaint procedure, and the company will handle all complaints swiftly and confidentially to the extent possible in light of the need to take appropriate corrective action. Lodging a complaint will in no way be used against the employee or have an adverse impact on the individual's employment status. Because of the damaging nature of harassment to the victims and to the entire workforce, aggrieved employees are strongly urged to use this procedure. However, filing groundless or malicious complaints is an abuse of this policy and will be treated as a violation.

### **Confidentiality**

During the complaint process, the confidentiality of the information received, the privacy of the individuals involved and the wishes of the complaining person will be protected to as great a degree as is legally possible. The expressed wishes of the complaining person for confidentiality will be considered in the context of the company's legal obligation to act on the charge and the right of the charged party to obtain information. In most cases, however, confidentiality will be strictly maintained by the company and those involved in the investigation. In addition, any notes or documents written by or received by the person(s) conducting the investigation will be kept confidential to the extent possible and according to any existing state or federal law.

### **Complaint procedure**

Kent Companies has established the following procedure for lodging a complaint of harassment, discrimination or retaliation. The company will treat all aspects of the procedure confidentially to the extent reasonably possible.

1. An individual who feels harassed, discriminated or retaliated against may initiate the complaint process by filing a complaint in writing with Kent Companies human resource (HR) director. No formal action will be taken against any person under this policy unless HR has received a written and signed complaint containing sufficient details to determine if the policy may have been violated. The complainant (the employee making the complaint) may obtain the complaint form from the HR department. If a supervisor or manager becomes aware that harassment or discrimination is occurring, either from personal observation or as a result of an employee's coming forward, the supervisor or manager should immediately report it to the HR director.

2. Upon receiving a complaint or being advised by a supervisor or manager that violation of this policy may be occurring, the HR director will notify the company and review the complaint with the company's legal counsel.
3. Within five working days of receiving the complaint, the HR director will notify the person(s) charged [hereafter referred to as "respondent(s)"] of a complaint and initiate the investigation to determine whether there is a reasonable basis for believing that the alleged violation of this policy occurred.
4. During the investigation, the HR director, together with legal counsel or other management employees, will interview the complainant, the respondent and any witnesses to determine whether the alleged conduct occurred.
5. Within 15 business days of the complaint being filed (or the matter being referred to the HR director), the HR director or other person conducting the investigation will conclude the investigation and submit a written report of his or her findings to the company.
6. If it is determined that harassment or discrimination in violation of this policy has occurred, the HR director will recommend appropriate disciplinary action. The appropriate action will depend on the following factors: a) the severity, frequency and pervasiveness of the conduct; b) prior complaints made by the complainant; c) prior complaints made against the respondent; and d) the quality of the evidence (e.g., first-hand knowledge, credible corroboration).
7. If the investigation is inconclusive or if it is determined that there has been no violation of policy but potentially problematic conduct may have occurred, the HR director may recommend appropriate preventive action.
8. Within five days after the investigation is concluded, the HR director will meet with the complainant and the respondent separately, notify them of the findings of the investigation, and inform them of the action being recommended.
9. The complainant and the respondent may submit statements to the HR director challenging the factual basis of the findings. Any such statement must be submitted no later than five working days after the meeting with the HR director in which the findings of the investigation are discussed.
10. Within 10 days from the date the HR director meets with the complainant and respondent, the company will review the investigative report and any statements submitted by the complainant or respondent, discuss results of the investigation with the HR director and other management staff as may be appropriate, and decide what action, if any, will be taken. The HR director will report the company's decision to the complainant, the respondent and the appropriate management assigned to the department(s) in which the complainant and the respondent work. The company's decision will be in writing and will include findings of fact and a statement for or against disciplinary action. If disciplinary action is to be taken, the respondent will be informed of the nature of the discipline and how it will be executed.

## **Workplace Bullying**

### **Purpose**

The purpose of this policy is to communicate to all employees, including supervisors, managers and executives, that Kent Companies will not in any instance tolerate bullying behavior. Employees found in violation of this policy will be disciplined, up to and including termination.

### **Definition**

Kent Companies defines bullying as repeated inappropriate behavior, either direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment. Such behavior violates Kent Companies Code of Ethics, which clearly states that all employees will be treated with dignity and respect.

### **Examples**

Bullying may be intentional or unintentional. However, it must be noted that when an allegation of bullying is made, the intention of the alleged bully is irrelevant, and will not be given consideration when meting out discipline. As in sexual harassment, it is the effect of the behavior on the individual that is important. Kent Companies considers the following types of behavior examples of bullying:

- **Verbal bullying:** Slandering, ridiculing or maligning a person or his or her family; persistent name calling that is hurtful, insulting or humiliating; using a person as butt of jokes; abusive and offensive remarks.
- **Physical bullying:** Pushing, shoving, kicking, poking, tripping, assault or threat of physical assault, damage to a person's work area or property
- **Gesture bullying:** Nonverbal threatening gestures; glances that can convey threatening messages.
- **Exclusion:** Socially or physically excluding or disregarding a person in work-related activities.

In addition, the following examples may constitute or contribute to evidence of bullying in the workplace:

- Persistent singling out of one person.
- Shouting or raising voice at an individual in public or in private.
- Using verbal or obscene gestures.
- Not allowing the person to speak or express himself or herself (i.e., ignoring or interrupting).
- Personal insults and use of offensive nicknames.
- Public humiliation in any form.
- Constant criticism on matters unrelated or minimally related to the person's job performance or description.

- Ignoring or interrupting an individual at meetings.
- Public reprimands.
- Repeatedly accusing someone of errors that cannot be documented.
- Deliberately interfering with mail and other communications.
- Spreading rumors and gossip regarding individuals.
- Encouraging others to disregard a supervisor's instructions.
- Manipulating the ability of someone to do his or her work (e.g., overloading, underloading, withholding information, assigning meaningless tasks, setting deadlines that cannot be met, giving deliberately ambiguous instructions).
- Inflicting menial tasks not in keeping with the normal responsibilities of the job.
- Taking credit for another person's ideas.
- Refusing reasonable requests for leave in the absence of work-related reasons not to grant leave.
- Deliberately excluding an individual or isolating him or her from work-related activities, such as meetings.
- Unwanted physical contact, physical abuse or threats of abuse to an individual or an individual's property (defacing or marking up property).

### **Workplace Violence Prevention**

We are committed to preventing workplace violence and to maintaining a safe work environment. Given the increasing violence in society in general, we have adopted the following guidelines to deal with intimidation, harassment, or other threats of (or actual) violence that may occur during business hours or on its premises.

All employees, including supervisors and temporary employees, should be treated with courtesy and respect at all times. Employees are expected to refrain from fighting, "horseplay," or other conduct that may be dangerous to others. Firearms, weapons, and other dangerous or hazardous devices or substances are prohibited from the premises of the company without proper authorization.

We recognize that there are state laws regarding weapon permits, including concealed weapon permits. However, we prohibit the possession of weapons on company premises, in company vehicles, or while on company time regardless of any permit obtained by the employee.

Conduct that threatens, intimidates, or coerces another employee, a customer, or a member of the public at any time, including off-duty periods, will not be tolerated. This prohibition includes all acts of harassment, including harassment that is based on an individual's sex, race, age, or any characteristic protected by federal, state, or local law.

All threats of (or actual) violence, both direct and indirect, should be reported as soon as possible to your immediate supervisor or any other member of management. This includes threats by employees, as well as threats by customers, vendors, solicitors, or other members of

the public. When reporting a threat of violence, you should be as specific and detailed as possible.

All suspicious individuals or activities should also be reported as soon as possible to a supervisor. Do not place yourself in peril. If you see or hear a commotion or disturbance near your workstation, do not try to intercede or see what is happening.

We will promptly and thoroughly investigate all reports of threats of (or actual) violence and of suspicious individuals or activities. The identity of the individual making a report will be protected as much as is practical. In order to maintain workplace safety and the integrity of its investigation, the company may suspend employees, either with or without pay, pending investigation.

Anyone determined to be responsible for threats of (or actual) violence or other conduct that is in violation of these guidelines will be subject to corrective action per the company policy.

We encourage employees to bring their disputes or differences with other employees to the attention of their supervisors or the Corporate Human Resources Director before the situation escalates into potential violence. We are eager to assist in the resolution of employee disputes, and will not discipline employees for raising such concerns.

### **Diversity Policy**

Kent Companies is committed to fostering, cultivating and preserving a culture of diversity and inclusion.

Our human capital is the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation and company's achievement as well.

We embrace and encourage our employees' differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make our employees unique.

Kent Companies diversity initiatives are applicable—but not limited—to our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; layoffs; terminations; and the ongoing development of a work environment built on the premise of gender and diversity equity that encourages and enforces:

- Respectful communication and cooperation between all employees.
- Teamwork and employee participation, permitting the representation of all groups and employee perspectives.

- Work/life balance through flexible work schedules to accommodate employees' varying needs.
- Employer and employee contributions to the communities we serve to promote a greater understanding and respect for the diversity.

All employees of Kent Companies have a responsibility to treat others with dignity and respect at all times. All employees are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site, and at all other company-sponsored and participative events. All employees are also required to attend and complete annual diversity awareness training to enhance their knowledge to fulfill this responsibility.

Any employee found to have exhibited any inappropriate conduct or behavior against others may be subject to disciplinary action.

Employees who believe they have been subjected to any kind of discrimination that conflicts with the company's diversity policy and initiatives should seek assistance from a supervisor or an HR representative.