



EMPLOYEE HANDBOOK

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RECEIPT AND UNDERSTANDING

WELCOME

Welcome. You were chosen for your position primarily because we believe your talent and contributions will assist us in remaining a leader in this community and in our industry. We strive to be the employer of choice by providing our employees with safe working conditions, fair compensation and benefits, the tools and training to excel, and personal growth opportunities. We are pleased that you have joined our company and look forward to working with you!

This Handbook has been prepared to acquaint you with our Company and help you understand how we can all work together. Please read it carefully. Refer to it frequently. We want you to be aware of its contents and guidelines. We intend for this handbook to offer two-way communication: what you can expect from us, and what we expect from you.

If you have any questions as you read through this Handbook, please do not hesitate to discuss them with your supervisor. Your supervisor is a very important source of information and will be more than glad to assist you.

Thank you for joining our team, and may your work be rewarding to you and to the community.

ABOUT OUR COMPANY

C.W. Roberts Contracting, Inc. ("CWR" or "Company or Organization") has been in the construction business since January, 1976. The corporate office is located in Tallahassee with operation centers located in Freeport, Gulf Coast Terminal, Hosford, Okeechobee, Palm City, Panama City, Pensacola, Plant City, and Wildwood. One of Florida's premier heavy civil contractors, C.W. Roberts Contracting Inc. provides the finest quality asphalt paving and highway construction projects throughout the state.

Our commitment to excellence has provided us the opportunity to be the prime contractor for Florida Department of Transportation, local government highway projects, state and federal airports, state and federal correctional facilities, and commercial site work.

We perform clearing and grubbing, grading and excavation, underground utilities (storm drain, sanitary sewer, water and gas), erosion control, grassing, sub-grade stabilization, base, asphalt and concrete paving, security fencing, signalization and electrical lighting for highway and airfield, along with other related items of work.

From the beginning, C.W. Roberts Contracting, Inc. has held themselves to a higher standard than its competitors, resulting in a solid and respected reputation throughout our industry. The Company is known for its quality work and exemplifies business character and integrity. With more than 1000 employees, C.W. Roberts Contracting, Inc. is able to provide prompt and efficient service for all paving needs.

OUR MISSION

Our mission is to ensure a safe work environment for all of our employees, continuously improve the delivery of our projects and materials, to perform at the highest level, and to achieve excellence in customer satisfaction.

CORE VALUES

- Safety* - Protecting our workers is our top priority
- Respect* - We respect our people and the environment
- Family* - Family is the foundation of our business
- Opportunity* - We invest in our employees to succeed
- Excellence* - We build for today and tomorrow

HANDBOOK POLICIES GOVERNANCE

These policies have been written to state the expectations of all employees in a manner that best supports the core values of the organization. All employees are expected to follow the policies, as they are written, and to seek clarification from their supervisor on any policies or issues that are unclear.

Supervisors will be held accountable for administering the policies uniformly to all employees. Supervisors do not have the authority to grant exceptions to the policies under any circumstances. Only the Chief Executive Officer/President may grant exceptions to the policies contained within this Employee Handbook.

DISCLAIMER

This handbook is not intended to create an employment contract, express or implied, and in no way serves to modify the “at will” employment relationship between the employee and employer. Either party may choose to terminate the employment contract at any time, with or without cause or notice.

This handbook is intended to guide only and is not intended to be a complete description of C.W. Roberts Contracting, Inc. policies and procedures. The guidelines are not necessarily all-inclusive and unanticipated circumstances may arise that may cause us to modify the guidelines.

If circumstances require, the company may vary from the stated responsibilities and reserves the right to interpret, change, suspend, or dispute with or without notice all or any part of our policies, procedures, and benefits at any time. Changes will be effective on the dates determined by the Company, and after those dates, all superseded policies will be null. No individual supervisor or manager has the authority to change policies at any time. This handbook supersedes all previous information concerning the subjects discussed herein, whether oral or written. If you are uncertain about any policy or procedure, speak with your direct supervisor or the Human Resources Department.

WITHHOLDING POLICY

By executing the acknowledgement form attached to this Employee Handbook, the employee accepts and understands that it may be utilized as an enforceable document. If the employee fails to return any equipment, money, credit cards, or other property assigned to the employee during employment, the Company may first withhold the value of such amount from any final compensation due to the employee. If such compensation does not exist or is insufficient to offset the value of the property due, the employee understands and agrees that the Company has legal entitlement to such property and will be responsible for such value and the cost of all attorney fees and costs expended in pursuing such property.

BACKGROUND SCREENINGS DURING EMPLOYMENT

The Company must be able to employ individuals that are trustworthy and able to properly interact with key organizational partners. Employees agree, by signing the acknowledgement provision verifying agreement to this handbook, that the Organization may conduct occasional criminal, employment, driving, and educational backgrounds on employees as it deems necessary to conduct its operation in a profitable and legal manner. The Company reserves the right to take any and all action it deems necessary to act upon the results of such ongoing screening.

EQUAL EMPLOYMENT OPPORTUNITY

It is the policy of the Company to select the most qualified person for each position in the organization. No employee will discriminate against an applicant for employment or a fellow employee because of race, creed, color, religion, sex, national origin, ancestry, marital status, pregnancy, genetic information or age. No employee will discriminate against any applicant or fellow employee because of disability or because of the person's veteran status. We have adopted equal employment opportunity requirements not to discriminate and to take affirmative action to assure equal employment opportunity as required by Executive Order 11246. The requirements set forth in this executive order shall constitute the Company's equal employment opportunity and affirmative action responsibilities. This policy applies to all employment practices and personnel actions, including, but not limited to, employment, upgrading, demotion, transfer, compensation, recruitment, layoff, termination, and training.

The Company will work with the federal government and appropriate agencies in carrying out equal opportunity obligations, and in their review of the Company's activities under contract. The Company as prime contractor, and all subcontractors (not including material suppliers), holding subcontractors of \$10,000 or more will comply with the minimum specified requirement activities of equal employment opportunity. The Company will include those requirements in every subcontract of \$10,000 or more with such modification of language as is necessary to make them binding on the subcontractor.

C.W. Roberts Contracting, Inc. has designated Keisha Bracy as the Equal Employment Opportunity Officer. Any employee who wishes to speak to the EEO Officer, or wishes to file a complaint of discrimination should contact her at the Main Office in Tallahassee, FL. at 850-385-5060 Ext. 102.

All complaints of alleged discrimination should be reported immediately to employee's direct supervisor AND to the designated EEO Compliance Officer. If the supervisor does not respond to the complaint; or if the supervisor is the subject of the complaint; or the employee feels the supervisor's response to the complaint was inadequate, the employee must report the incident to a Senior Manager and the EEO Compliance Officer.

DISSEMINATION OF POLICY:

All members of the Company's staff who are authorized to hire, supervise, promote, and discharge employees, or who recommend such action, or who are substantially involved in such action, will be made fully aware of, and will implement, the Company's EEO policy and contractual responsibilities. To ensure that the above is met, the following actions will be as a minimum:

1. Periodic meetings of supervisory and personnel office employees will be conducted before the start of work and then not less often than once every six (6) months, at which time the Company's EEO policy and its implementation will be reviewed and explained. The meetings will be conducted by the EEO Officer or other knowledgeable company official.
2. All new supervisory or human resources department employees will be given thorough indoctrination by the EEO Officer, or other knowledgeable company official, covering all major aspects of the Company's EEO obligations within thirty (30) days following their reporting for duty with the Company.
3. The EEO Officer or appropriate company official will instruct all employees engaged in the direct recruitment of employees relative to the methods followed by the Company in locating and hiring minority group employees.
4. All supervisory personnel will be furnished with written statements of the Company's EEO policy and affirmative action program. In order to make the Company's EEO policy known to all employees. Prospective employees, and potential sources of employees, (i.e. schools, employment agencies, college placement offices, etc.) the Company will take the following actions:

- a. Notices and posters setting forth the Company's EEO Policy will be placed in areas readily accessible to employees, applicants and potential employees.
- b. The Company's EEO policy and the procedures to implement such policy will be brought to the attention of employees by means of meetings, personal interviews, or other appropriate means.

RECRUITMENT:

1. When advertising for employees, the Company will include in all advertisements for employees the notation: "An Equal Employment Opportunity Employer" or "EEO Employer" and "An Affirmative Action Plan Employer" or "AAP Employer". The Company will insert all such advertisements in newspapers, or other publications, having large circulation among minority groups in the area from which the project work force would normally be derived.
2. The Company will conduct systematic and direct recruitment through public and private employee referral sources likely to yield qualified minority group applicants, including, but not limited to, state employment agencies, schools, colleges, and minority group organizations. To meet this requirement, the Company will, through its EEO Compliance Officer, identify sources of potential minority group employees, and establish such identified sources whereby minority group applicants may be referred to the Company for employment consideration.
3. The Company will encourage its present employees to refer minority group applicants for employment by posting appropriate notices or bulletins in areas accessible to all such employees. In addition, information and procedures referring to minority group applicants will be discussed with employees.

PERSONNEL ACTIONS:

1. Wages, working conditions and employee benefits shall be established and administered, and personnel actions of every type, including hiring, upgrading, promotion, transfer, demotion, layoff and termination shall be taken without regard to race, color, religion, sex, disability status, veteran status, or national origin.
2. The Company will conduct periodic inspections of project sites to ensure that the working conditions and employee facilities do not indicate discriminatory treatment of project site personnel.
3. The Company will periodically evaluate the spread of wages paid within each classification to determine if there is any evidence of discriminatory wage practices.
4. The Company will periodically review selected personnel actions in depth to determine whether there is evidence of discrimination. Where evidence is found, the Company will promptly take corrective action. If the review indicates that the discrimination may extend beyond the actions reviewed, such corrective action shall include all affected persons.
5. The Company will investigate all complaints of alleged discrimination made to the Company, will attempt to resolve such complaints, and will take appropriate corrective action when applicable. If the investigation indicates that the discrimination may affect persons other than the complainant, such corrective action shall include such other persons. Upon completion of each investigation the Company will inform every complainant of all avenues of appeal.

TRAINING AND PROMOTION:

1. The Company will assist in locating, qualifying and increasing the skills of minority group employees and applicants for employment.
2. Consistent with its manpower requirements and as permissible under federal and state regulations, the Company will make full use of training programs (i.e., pre-apprenticeship, apprenticeship, and/or on-the-job training programs) for the geographical area of contract performance.
3. The Company will advise employees and applicants for employment of available training programs and entrance requirements for each.

4. The Company will periodically review the training and promotion potential of minority group employees and will encourage eligible employees to apply for such training and promotion.

SUBCONTRACTING:

1. The Company will use its best efforts to utilize minority group subcontractors or subcontractors with meaningful minority group representation among their employees.
2. The Company will use its best efforts to assure subcontractor compliance with their equal employment opportunity obligations.
3. The Company will make distribution to all subcontractors, under contract to the Company, written statements of the Company's EEO policy and affirmative action program.

RECORDS AND REPORTS:

1. The Company will keep such records as are necessary to determine compliance with the Company EEO obligations. The records of the Company will be designed to indicate:
 - a. The number of minority and non-minority group members in each work classification on the project.
 - b. The progress and efforts being made in locating, hiring, training, qualifying and upgrading minority group employees.
 - c. The progress and efforts being made in securing the services of minority group subcontractors or subcontractors with meaningful minority group representation among their employees.
2. All such records will be retained for a period of three (3) years following completion of the contract work and shall be available at reasonable times and places for inspection by authorized representatives of the federal government and appropriate agencies.
3. The Company shall submit to the federal government and appropriate agencies necessary reports to substantiate its compliance of its EEO responsibilities.

We are committed to providing equal opportunity in all of our employment practices, including selection, hiring, promotion, transfer, and compensation to all qualified applicants and employees without regard to age, race, religion, color, sex, national origin, marital status, citizenship status, disability, pregnancy, genetic information or any other protected status in accordance with the requirements of all federal, state, and local laws. Please refer to the EEO / AA Plan, located at your local office.

Please do not assume that the Company is aware of your problem. Bring your complaints and concerns to your supervisor or the EEO Officer for resolution. YOU WILL NOT BE PENALIZED IN ANY WAY FOR REPORTING IMPROPER CONDUCT.

SEXUAL AND OTHER ILLEGAL HARASSMENT POLICY
AND COMPLAINT PROCEDURE

Harassment is a form of predatory sexual behavior in which a person targets another employee(s) relating to an individual's age, race, color, sex (including same-sex sexual harassment), religion, national origin, gender identity or expression, or sexual orientation, or disability. It constitutes discrimination and is illegal under federal, state and local laws. For the purposes of this policy, "sexual harassment" is defined, as in the Equal Employment Opportunity Commission Guidelines, as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example: a) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, b) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or c) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Title VII of the Civil Rights Act of 1964 recognizes two types of sexual harassment: a) quid pro quo and b) hostile work environment. Sexual harassment may include a range of subtle and not-so-subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering, whistling or touching; insulting or obscene comments or gestures; display in the workplace of sexually suggestive objects or pictures; and other physical, verbal or visual conduct of a sexual nature.

This policy applies to all employees of our Organization working at all locations. All employees have an obligation to report sexual harassment—even if he or she is not the victim.

All workers, including supervisors and managers, will be subject to discipline, up to and including discharge, for any act of sexual harassment they commit.

Examples of Prohibited Conduct:

Though sexual harassment encompasses a wide range of conduct, some examples of specifically prohibited conduct include the following:

- Physical assaults of a sexual nature, such as rape, sexual battery, molestation or attempts to commit these assaults, and intentional physical conduct that is sexual in nature, such as touching, pinching, patting, grabbing, brushing against another employee's body or poking another employee's body.
- Unwelcome sexual advances, propositions or other sexual comments, such as sexually oriented gestures, noises, remarks, jokes or comments about a person's sexuality or sexual experience.
- Inappropriate statements, written or verbal, comments, jokes, or threats directed toward a person based on his or her age, race, color, sex (including same-sex sexual harassment), religion, national origin, gender identity or expression, or sexual orientation, or disability.
- Preferential treatment or promises of preferential treatment to an employee for submitting to sexual conduct, including soliciting or attempting to solicit any employee to engage in sexual activity for compensation or reward.
- Preferential treatment or promises of preferential treatment to an employee based on his or her age, race, color, sex (including same-sex sexual harassment), religion, national origin, gender identity or expression, or sexual orientation, or disability.
- Negative treatment or threats of negative treatment to an employee based on his or her age, race, color, sex (including same-sex sexual harassment), religion, national origin, gender identity or expression, or sexual orientation or disability.
- Subjecting, or threats of subjecting, an employee to unwelcome sexual attention or conduct or intentionally making performance of the employee's job more difficult because of that employee's sex.
- Sexual or discriminatory displays or publications anywhere in our workplace by our employees.
- Retaliation for sexual harassment complaints.

Remote-based sexual harassment is also strictly prohibited. Examples of such behaviors include:

- Inappropriate jokes, memes, or images shared through email or messaging, including sexually explicit content and content.
- Sharing of or solicitation of inappropriate or explicit photographs.
- Sending inappropriate website links or nude photographs or sexual videos.
- Suggestive comments or solicitations through chat, private messaging, or phone.
- Denigrating sexist comments in a video conference or one-on-one discussion, whether directed at an individual or generalized to a group.
- Statements or questions of a sexual nature during conference calls or video meetings.

- Unwanted flirtatiousness or romantic advances, even if not sexually explicit including commentary on a co-worker's appearance or sound during a remote meeting.
- Subjecting viewers or listeners to sexual content during remote meetings including sharing pornographic images and/or audio, showing intimate body parts, or engaging in sexual activity, even if it is accidental.

Responding to Violations of this Policy:

If an employee believes that he or she has been subject to sexual harassment or any unwelcome sexual attention, he or she may address the situation directly and immediately to the harasser, if possible. If the inappropriate conduct does not cease, or if the employee is unable to or uncomfortable with addressing the alleged harasser directly, he or she should report the incident to his or her own supervisor or manager. If the inappropriate conduct does not cease, or if the employee is unable to or uncomfortable with addressing the situation with the supervisor or manager, he or she should report the incident to the Human Resource (HR) director. If the Human Resource Director is not available or the employee is uncomfortable addressing the situation with the Human Resources Director, the employee may report the incident to a Senior Manager.

It is important to report all concerns of sexual harassment or inappropriate sexual conduct to the HR director or a supervisor/manager as soon as possible. Management must be made aware of the situation so that it can conduct an immediate and impartial investigation and take appropriate action to remediate or prevent prohibited conduct from continuing.

Employees who violate this policy are subject to appropriate discipline. If an investigation results in a finding that this policy has been violated, the mandatory minimum discipline is a written reprimand. The discipline for very serious or repeat violations is termination of employment. Persons who violate this policy may also be subject to civil damages or criminal penalties.

All inquiries, complaints and investigations are treated discreetly. Information is revealed strictly on a need- to-know basis. Information contained in a formal complaint is closely contained. All information pertaining to a sexual harassment complaint or investigation is maintained by the HR director in secure files. The HR director can answer any questions relating to the procedures for handling information related to sexual harassment complaints and investigations to complainants and respondents.

Retaliation Prohibited

Federal, state, and local laws prohibit punishing job applicants or employees for asserting their rights to be free from discrimination, harassment, or inappropriate sexual conduct. Additionally, employees are protected from reporting in good faith actions they reasonably believe to be illegal or unlawful. Asserting these rights is called "protected activity," and it can take many forms. For example, it is unlawful to retaliate against applicants or employees for:

- filing or being a witness in a complaint, investigation, or lawsuit;
- communicating with a supervisor or manager about employment discrimination, including harassment or a report of illegal or unlawful activity;
- answering questions during an employer investigation;
- refusing to follow orders that would result in discrimination or other illegal or unlawful actions;
- resisting sexual advances, or intervening to protect others; and
- requesting accommodation for a disability or for a religious practice.

Participating in a complaint process or an investigation is protected from retaliation under all circumstances. Other

acts to oppose discrimination or illegal actions are protected as long as the employee was acting on a reasonable belief that something in the workplace may violate federal, state, and/or local laws addressing the employment relationship, even if he or she did not use legal terminology to describe it or is ultimately incorrect about the issue, provided the employee has made complaint in good faith.

Engaging in protected activity, however, does not shield an employee from all discipline or discharge. Employers are free to discipline or terminate workers if motivated by non-retaliatory and non-discriminatory reasons that would otherwise result in such consequences.

AMERICANS WITH DISABILITIES ACT (ADA)

It is the policy of the Company to comply with the Americans with Disabilities Act (ADA) and related state laws. To be protected under the ADA, an individual with a disability/impairment must be qualified to perform the essential functions of the job, with or without reasonable accommodation. Where an individual's functional limitation may affect the performance of one or more of those essential job functions, the Company will take steps to consider whether a reasonable accommodation can be made to help the employee overcome the particular physical or mental limitation, unless doing so would impose an undue hardship on the company. **However, for the Company to consider whether a reasonable accommodation can be made, the employee in need of such consideration must first notify the Company of their need for the company to consider the accommodation due to a health condition and offer any ideas as to what may be a possible method of accommodation.** The Company is committed to discussing the issue with the employee, and in turn may also offer ideas as to what may constitute a reasonable accommodation. The Company may also require the input of employees' physician to seek ideas about possible accommodation, the needed duration of such, and other relevant information that will help in determining possible means and methods of potential reasonable accommodation. The Company is not bound to accept the employee's or physicians' suggestion, but will give it due consideration, as well as offer other possible solutions, if appropriate. The Company will consider such things as what job function is needing accommodation, the impact such accommodation has on the functions of the job, the impact it might have on other business operations, and/or the impact an accommodation might have on the workload of other employees. The Company is committed to engaging in this interactive process with employees who have made known to the Company their need for a possible accommodation for their health condition. However, there is no guarantee that any accommodation will be made as each circumstance must be viewed individually and is dependent upon the existence of a reasonable solution.

It is the policy of this company to afford equal opportunity to all employees, regardless of physical or mental disability. However, all employees with such disabilities are expected to perform the essential functions of their positions as defined in their respective job descriptions or as performed on a regular basis as part of their normal responsibilities. All employees with disabilities are eligible for accommodations per the American with Disabilities Act. Such requests must be made to either the employee's direct supervisor or made to the Equal Employment Opportunities Officer of the Company. While the Company cannot make all requested accommodations, it will work with the employees to define reasonable terms and supply such terms to the employee. If the employee cannot perform the essential functions with the requested accommodation, the employee may be separated from the Company.

FAMILY OR MEDICAL LEAVE ACT (FMLA)

The Family and Medical Leave Act (FMLA) provides job-protected leave to eligible employees. "Job-protected" means that your job will be held for you while you are on FMLA leave and that your absences will not be counted against you in any way. Another benefit of FMLA is that you are allowed to continue to pay your portion of certain insurance benefits you may be enrolled in at the time of leave.

Employees must notify their supervisor at least 30 days prior or as soon as practicable when taking FMLA leave and

complete the required forms in a timely matter. The Office Manager of each division will provide the employee with the FMLA Request Form and Certification of Healthcare Provider Form. The completed form is to be submitted to the H.R. Benefit Manager. The H.R. Benefit Manager will send the Notice of Eligibility form to the employee; the original goes to the employee and a copy submitted to Human Resources. The Benefit Manager will also send the employee a Designation Notice, contact the employee regarding benefits, and communicate with the employee regarding their return-to-work status.

Eligible employees may take **up to 12 weeks** of unpaid, job-protected leave each year for specified family or medical reasons. In the event you need to take a leave to deal with a family issue and you qualify for FMLA leave, the following guidelines will apply:

Employee Eligibility

To be eligible for family or medical leave, you must:

1. Have worked at least 12 months for the Company;
2. Have worked at least 1,250 hours for the Company over the previous 12 months; and,
3. Work at a location where there are at least 50 employees within 75 miles.

Conditions Triggering Leave

Family or medical leave must involve one or more of the following reasons:

1. For the birth of a child, to care for a newly born child, or placement of a child with the employee for adoption or foster care.
2. To bond with a child (leave must be taken within one year of the child's birth or placement);
3. To care for an immediate family member (spouse, child, or employee's parent) who has a qualifying serious health condition.
4. Because of the employee's serious health condition which makes the employee unable to perform the functions of the employee's job.

Duration of Leave

Eligible employees may receive up to 12 work weeks of unpaid leave during any "rolling" 12-month period, measured backward from the date of any family or medical leave. Family or medical leave involving the birth or placement of a child for adoption or foster care must be concluded within 12 months of the birth or placement.

You may take family or medical leave intermittently – which means taking leave in blocks of time or by reducing your normal weekly or daily work schedule – whenever it is medically necessary to care for a seriously ill family member, or because you are seriously ill and unable to work. Intermittent leave is not allowed for leave related to bonding with a child.

Depending on the purpose of your leave request, you may choose (or the Company may require you) to use accrued paid leave, if available, while on leave of absence.

Note: The definition of “son or daughter “under the FMLA includes not only a biological or adopted child, but also foster child, a stepchild, a legal ward, or a child of a person standing in loco parentis. The definition of loco parentis is construed to ensure that an employee who has day-to-day responsibility for caring for a child is entitled to leave even if the employee does not have biological or legal relationship to that child.

Military Caregiver Leave

Effective immediately, up to 26 weeks of unpaid caregiver leave may be taken to care for a spouse, child, parent or next of kin who is a “covered serviceman” with a serious injury or illness. A covered service member may be either a current service member or a veteran of the Armed Forces, provided the discharge was anything other than dishonorable and occurred within the past five years.

For a current service member, a serious injury or illness is one that was incurred by a service member in the line of duty that may render the service member medically unfit to perform the duties of his or her office, grade, rank, or rating. A serious injury or illness also includes injuries or illnesses that existed before the service member’s active duty and that were aggravated by service in the line of duty on active duty.

For a veteran, a serious injury or illness that was incurred or aggravated when the veteran in the line of duty on active duty in the Armed Forces or that existed before the veteran’s active duty and was aggravated by service in the line of duty on active duty, and that is either:

- a continuation of a serious injury or illness that was incurred or aggravated when the veteran was a member of the Armed Forces and rendered the service member unable to perform the duties of the service member’s office, grade, rank or rating; or
- a physical or mental condition for which the veteran has received a Department of Veterans Affairs Service-Related Disability Rating (VASRD) of 50 percent or greater (the rating may be based on multiple conditions).
- a physical or mental condition that substantially impairs the veteran’s ability to work because of a disability or disabilities related to military service, or would do so absent treatment; or
- an injury that is the basis for the veteran’s enrollment in the Department of Veterans Affairs Program of Comprehensive Assistance for Family Caregivers.
-

Qualifying Exigency Leave

Additionally, close family members of military personnel (as defined as spouse, child, or parent) may take up to 12 weeks of job protection leave, if eligible, if the member of the military is on covered active duty or called to covered active duty.

For members of the regular Armed Forces, “Covered Active Duty” means duty during deployment of the member with the Armed Forces to a foreign country.

For members of the reserve components of the Armed Forces (members of the National Guard and Reserves), “Covered Active Duty” means duty during deployment of the member with the Armed Forces to a foreign country under a call or order to active duty in support of a contingency operation.

Maintenance of Health Benefits

If you and/or your family participate in a group health plan, the Company will maintain coverage under the plan during your family and medical leave. This coverage will be provided if you or your family were covered under the plan before the leave was taken and on the same terms as if you had continued work. You must contact the H.R. Benefit Manager and arrange to make payments for the employee share of health plan premiums while on leave.

In some instances, the Company may recover premiums it paid to maintain health coverage for an employee and family.

Job Restoration

Upon returning from family or medical leave, you will normally be restored to your original job, or to an equivalent job with equivalent pay, benefits, and other employment terms and conditions. In addition, your use of family or medical leave will not result in the loss of any employment benefit that you earned or were entitled to before using family or medical leave.

Notice and Medical Certification

When seeking family or medical leave, you must provide:

1. 30 days advance notice of the need to take family or medical leave, if the need is foreseeable.
2. Medical certifications support the need for leave due to a serious health condition affecting you or an immediate family member. Second or third medical opinions and periodic recertification at the Company's expense may also be required.
3. Such periodic reports as deemed appropriate during the leave regarding your status and intent to return to work.
4. Medical certification of fitness for duty before returning to work, if the leave was due to your serious health condition.

When leave is needed for a planned medical treatment for your own serious health condition or that of an immediate family member, you must try to schedule treatment so that it will not unduly disrupt the Company's operation. Failure to comply with these requirements may result in delay or denial of leave.

Other Employment

Outside employment during your leave period is prohibited, and may result in disciplinary action, up to and including immediate termination of employment.

Exceeding FMLA Leave

Any employee who exceeds their 12-week FMLA entitlement may be subject to termination of employment.

Non-Contractual Nature of this Policy

The duration of leave, availability of benefits, opportunity for job restoration, and other rights and privileges associated with FMLA leave are limited by the requirements of applicable state and federal law. No express or implied contractual rights should be inferred from this policy. The Company reserves the right to modify this or any other policy as necessary, in its sole discretion.

BENEFIT CONTINUATION DURING LEAVE OF ABSENCE

During an approved leave of absence, it is the expectation that you will pay the employee share of your benefits. Coverage can only be continued if you arrange in advance to pay for your benefits. To maintain any of your benefits (health, life, disability, etc.), you are responsible for paying the employee premium amount by the first of every month for the month of coverage. If you fail to make the payments as prescribed, coverage may be cancelled. If coverage is cancelled, your benefits will end on the last day of the month for which a premium has been paid. As a courtesy, you will be provided with a notice of intent to cancel with a 15-day grace period in which to get premiums current prior to cancellation. You will have the option to continue your benefits under COBRA; however you will be responsible for paying the full premium, which includes the employee and the employer cost per month.

There are specific requirements for continuation of benefits under FMLA and COBRA. Please see those policies for details about benefit continuation under those programs.

BENEFIT CONTINUATION FOR EMPLOYEES WHO DO NOT QUALIFY FOR FMLA

The guidelines for benefit continuation are different for employees who do not qualify for FMLA. If an employee doesn't qualify for FMLA, their benefits (health, life, disability, etc.) will end on the last day of the month in which they reach 30 days on an approved leave of absence. The employee can continue benefits under COBRA; however the employee will be responsible for paying the full premium, which includes the employee and the employer cost per month. Please see the COBRA policy for details about benefit continuation. Employees must notify the H.R. Benefit Manager when they request a leave of absence.

CONSOLIDATED OMNIBUS BUDGET RECONCILIATION ACT (COBRA)

On April 7, 1986, a federal law was enacted (Public Law 99-272, Title X) requiring that most employers sponsoring group health plans offer employees and their families the opportunity for a temporary extension of health coverage (called "continuation coverage") at group rates in certain instances where coverage under the plan would otherwise end. This notice is intended to inform you, in a summary fashion, of your rights and obligations under the continuation coverage provisions of the law.

If you are an employee of the Company, covered by the Company's medical insurance plan, you have the right to choose continuation coverage if you lose your group health coverage because of a reduction in your hours of employment or the termination of your employment (for reasons other than gross misconduct on your part). Your eligible dependents may also have the right to elect and pay for continuation coverage for a temporary period in certain circumstances where their coverage under the Plan would otherwise end.

Contact the Plan Administrator with questions concerning your rights under COBRA.

PREGNANCY AND BREASTFEEDING ACCOMMODATIONS

The Pregnant Workers Fairness Act (the "PWFA") expressly prohibits employment discrimination based on pregnancy and pregnancy-related conditions. The Organization does not discriminate against employees or applicants with respect to pregnancy or pregnancy-related conditions including pre and post-pregnancy conditions.

The Organization will not deny an employment opportunity or take adverse action against an employee because of the employee's pregnancy, pregnancy-related condition, or request for reasonable accommodation. Likewise, the Organization will not refuse to hire a pregnant applicant or an applicant with a pregnancy-related condition because of the pregnancy or pregnancy-related condition, as long as doing so would not create an undue hardship for the Organization.

The Organization will make reasonable accommodations to the known limitations related to the pregnancy, childbirth, or related medical conditions of a qualified employee, unless the accommodation would impose an undue hardship on the ability of the Organization to properly fulfill its mission.

Upon notification of an employee's pregnancy, childbirth, or related medical condition, the Organization will engage in an interactive process to determine appropriate accommodations. Accommodations may include, but are not limited to, more frequent or longer breaks, time off to recover from childbirth, acquisition or modification of equipment,

appropriate seating, temporary transfer to a less strenuous or less hazardous position, job restructuring, light duty, modified work schedule, and private space that is not a bathroom for expressing breast milk. Requests for reasonable accommodation will be assessed on a case-by-case basis, taking into consideration the employee's job responsibilities, medical needs, and the Organization's operational requirements. Accommodation will be provided unless the accommodation imposes an undue hardship.

WORKPLACE INJURIES

Our Organization strives to provide a workplace that is free from any known health or injury hazards. Employees can assist us by bringing forward any health or safety concerns. Employees may speak with their supervisor or our Human Resources Department about any issues related to safety without fear of reprisal or retaliation. Employees may also receive periodic training on workplace safety and responsible handling of hazardous substances.

If an employee sustains a job-related injury or illness, it must immediately be reported to the supervisor, our Human Resources Department, or another member of management. This reporting requirement applies to all injuries, no matter how small or insignificant it may appear initially. The Organization wants to ensure that any injured employee receives prompt and appropriate medical attention. Additionally, our Organization complies with all federal and state regulatory standards regarding workplace injuries and illnesses. As such, we must make a timely record of any workplace injuries or illnesses. We also are responsible for workers' compensation insurance for employees which provides for medical coverage, disability coverage and loss of work time compensation due to a work-related injury.

Employees may report work-related injuries and illnesses without any concerns of adverse employment action or retaliation by our Organization.

RESPONSIBILITIES WHILE ON WORKERS' COMPENSATION LEAVE

Employees who are unable to work due to an injury at work will continue to have certain responsibilities or obligations during the time they are restricted from working. All such responsibilities will be subject to applicable federal, state, and/or local laws.

Specifically, employees restricted from working due to an on-the-job injury will be required to:

- Comply with all requirements or requests related to the documentation of leave, including FMLA leave, if applicable.
- Comply with all requirements of the Organization's leave policy (please note employees out of work due to an on-the-job injury may but are not required to use available leave).
- Comply with all requirements related to the employee's continuation of any benefits while on leave.
- Comply with all reasonable requests for information related to the employee's status on leave.
- Comply with all medical restrictions imposed by any medical providers, including as related to any other employment the employee may have.

Employees are advised to review the specific policies related to each of the issues above that are included in the handbook (e.g., Benefits Continuation During Unpaid Leave of Absence). Further, please be advised that intentional actions inconsistent with the medical restrictions issued by an employee's medical providers, including employment at another employer outside of the employee's specific medical restrictions reported to the Organization, may result in disciplinary action, up to and including termination.

DRUG AND ALCOHOL POLICY

Purpose Statement

C.W. Roberts Contracting Inc. (CWR) has a vital interest in maintaining a safe and efficient environment for its employees, clients, and customers. Employees who are under the influence of drugs or alcohol on the job pose serious safety risks not only for the user but also to co-workers and others. The possession, use or unauthorized sale of an illegal drug or alcohol may also pose unacceptable risks for safe and efficient operations. Accordingly, it is the right, obligation, and intent of CWR to maintain a safe and efficient environment for all its employees and guests and to protect Company property, equipment, and operations.

CWR has adopted a drug-free workplace policy to ensure that our business is functioning safely, efficiently, and cost-effectively. In doing so, CWR will comply with all federal and state drug-free workplace requirements. In addition, CWR has established a program that meets the requirements to disqualify individuals from receiving benefits for workers' compensation and unemployment compensation purposes.

CWR will require all employees and job applicants to consent to, participate in, and comply with this policy as a condition of employment and continued employment. For those who refuse to seek help on their own or who fail to cooperate fully with the terms and conditions of this policy, CWR will take appropriate measures to address the situation promptly and directly. Substance abuse that affects the workplace will not be tolerated.

Coverage

This policy applies to all employees of CWR when they are on Company business or on Company premises, including but not limited to, all properties, facilities, land, platforms, buildings, structures, fixtures, installations, automobiles, trucks, and other vehicles whether owned, leased or used by CWR or for Company purposes. This policy also covers the use of drugs or alcohol while off Company premises if the employee is "under the influence" as defined in this policy, when representing CWR. Additionally, regardless of the event or situation employees are always responsible for their actions and behavior at Company-related events or activities.

Covered Employees

CWR's drug-free workplace policy covers all:

- Full-time employees
- Part-time employees
- Temporary workers
- Leased workers
- Subcontractor

In addition, employees subject to the Department of Transportation (DOT) drug and alcohol testing rules and regulations will be required to test under this policy. Testing will be separate and apart for the required DOT testing.

Applicants

All applicants are covered by this Policy inasmuch as CWR has extended a conditional offer of employment pending the applicants written consent to take and provide a negative pre-employment drug test. If a pre-employment drug test is positive or if the applicant refuses to undergo testing, the offer of employment will be withdrawn.

Applicants are not entitled to employee assistance benefits, company-paid retest or any other services made available to employees in this policy unless stipulated by applicable state or federal law.

Designated Employer Representative (DER)

The Designated Employer Representative (DER) is the Area Manager or Office Manager at each location. The DER is responsible for the management of the drug testing program at their location. Employees with questions regarding the drug free workplace program should contact Corporate Human Resources.

Employee Assistance Program (EAP)

CWR offers an Employee Assistance Program (EAP) for employees and their dependents. The EAP provides confidential assessment, referral, and short-term counseling for employees who need or request it. Ability Assist Counseling Services offers 24/7 access to master's and Ph.D. level clinicians. Includes three face-to-face visits per occurrence per year at no

cost. Other counseling or treatment services with a fee may be covered by the employee's medical insurance plan; however, any costs not covered by the employee's medical insurance plan, and which are not otherwise required to be paid by any applicable plan are entirely the employee's sole responsibility.

Any employee, through self-referral or through a referral source, can access the EAP. These EAP services are available to employees if CWR's disciplinary rules have not been violated. Employees may not escape discipline, however, by first requesting EAP services after being selected for testing or violating CWR's policies and rules of conduct. Nor will such requests or utilization of EAP services excuse employees from compliance with normal standards of performance or conduct. Information provided when accessing and utilizing EAP services will be kept confidential in accordance with any applicable federal and/or state law requirements.

For more information about the Company's EAP program contact: The Hartford, Contract# 878606, Phone: 1-800-523-2233.

Education & Training

CWR will provide employee drug awareness information. Supervisors will be trained and certified on how to recognize signs and symptoms of substance abuse, and how to confront, collaborate and document an employee exhibiting signs of being under the influence of drugs or alcohol.

Non-Discrimination

In accordance with the Americans with Disabilities Act, 42 U.S.C. §12101 (the "ADA"), CWR does not discriminate against any qualified individuals with a disability who are not currently using illegal drugs and who have either successfully completed rehabilitation or who may be currently participating in a supervised rehabilitation program and are no longer using illegal drugs. Nothing contained in this policy shall be construed or be applied in such a way that its application will, result in discrimination against any individual with a disability or handicap as those terms are defined by the Americans with Disabilities Act.

A current disability of any kind, however, does not entitle an employee and/or job applicant to violate any provisions of this policy.

- Failing to notify a supervisor or manager of the use of a prescription drug or over-the-counter medication that could alter the ability of an employee to safely perform essential job functions, or that poses a direct threat to the employee's/applicant's own safety or the safety of others.
- Failing to notify a supervisor or manager if the employee believes that he or she is under the influence of drugs or alcohol. Bringing illegal drugs, alcohol, controlled substances, or drug paraphernalia to work and/or storing such items on Company property. Possessing, using, manufacturing, distributing, or attempting to distribute, sell or dispense drugs or controlled substances off Company property that may adversely affect CWR, the worker's job performance, or place at risk the safety or wellbeing of the worker or others.
- Failing to notify CWR in writing immediately of a criminal drug or alcohol conviction to a criminal drug or alcohol offense. This does not include convictions that are sealed, expunged, or erased.
- Abusing prescription drugs (which includes exceeding the recommended prescribed dosage), usage in a manner other than for which a medication was prescribed, using other(s)' prescribed medications, and/or obtaining medications in an illegal manner including obtaining medications from a foreign country without a valid and legal U.S. prescription.
- Switching, tampering with, or adulterating any specimen or sample collected for purposes of enforcing this policy.
- Disclosing information related to a drug or alcohol test result, and/or substance abuse treatment referrals, except as required by this policy.
- Failure to consent to and participate in and abide by the terms and recommendation of the Substance Abuse Professional (SAP) or Employee Assistance Professional (EAP), as defined in this policy.
- Failing to cooperate with the terms and conditions of this policy. Failure to cooperate includes, but is not limited to:
 - a. Refusal to be tested,
 - b. Failure to provide an adequate sample without a valid medical excuse,
 - c. Refusal to sign required paperwork (including, but not limited to, consent forms, acknowledgement forms, and chain of custody forms),
 - d. Failure to timely show up at an assigned collection site to provide a specimen, and

e. Failure to be reasonably available once notified of a required test.

Drug and Alcohol Testing

CWR will conduct drug testing of job applicants and employees to achieve a safe and productive work environment. In addition, CWR will conduct drug and alcohol testing for random screenings, post-accident, and reasonable suspicion as outlined in this policy. CWR will conduct such testing within the parameters of any applicable state, federal, and local laws. CWR reserves the right to use any scientifically valid methods and procedures, which are not otherwise prohibited by applicable law, including breath, urine, saliva, blood, or hair testing.

Cost of Drug Tests

CWR will pay the cost of all drug tests, initial and confirmation, which the employer requires of employees. An employee or job applicant shall pay the costs of any additional drug tests not required by the employer.

Drugs

CWR will test individuals for drugs utilizing urine testing technologies. CWR reserves the right to utilize other testing technologies in accordance with applicable laws and when circumstances require an alternative.

An individual who tests positive for any of the following substances may be subject to adverse employment action. (See the Consequences section of this policy for more information:)

- Amphetamines
- Barbiturates
- Benzodiazepines 20
- Cannabinoid (marijuana)
- Cocaine
- Opiates (including heroin, morphine, and codeine) and other opioids like oxycodone
- Methadone
- Phencyclidine (PCP)

Alcohol

Blood is the approved specimen for alcohol testing with a cut-off level 0.04 or greater. However, a cut-off level of 0.08 or greater will be the level to deny or reduce workers' compensation benefits.

Common Medications That May Alter/Affect Test

The following is a list of common medications which may alter or affect a drug test, as developed by the Florida Agency for Health Care Administration, and obtained through the Florida Division of Workers' Compensation of the Department of Labor and Employment Security:

Alcohol

All liquid medications containing ethyl alcohol (ethanol). Please read the label for alcohol content. As an example, Vick's Nyquil is 25% (50 proof) ethyl alcohol, Comtrex is 20% (40 proof), Contac Severe Cold Formula Night Strength is 25% (50 proof) and Listerine is 26.9% (54 proof).

Amphetamines

Obetrol, Biphentamine, Desoxyn, Dexedrine, Didrex, Ionamine, Fastin.

Cannabinoids

Marinol (Dronabinol, THC)

Cocaine

Cocaine HCl topical solution (Roxanne).

Phencyclidine 7

Not legal by prescription.

Opiates

Paregoric, Parepectolin, Donnagel PG, Morphine, Tylenol with Codeine, Empirin with Codeine, APAP with Codeine, Aspirin with Codeine, Robitussin AC, Guaiatuss AC, Novahistine DH, Novahistine Expectorant, Dilaudid (Hydromorphone), M-S Contin and Roxanol (morphine sulfate), Percodan, Vicodin, Tussi-Organidin, etc.

Barbiturates

Phenobarbital, Tuinal, Amytal, Nembutal, Seconal, Lotusate, Fiorinal, Fioricet, Esgic, Butisol, Mebral, Butabarbital, Butalbital, Phenrinin, Triad, etc.

Benzodiazepines

Ativan, Azene, Clonopin, Dalmine, Diazepam, Librim, Xanax, Serax, Tranxene, Valium, Verstran, Halcion, Paxipam, Restoril, Centrax.

Methadone

Dolophine,,Methadose.

Confirmatory Retest

Within 180 days of receiving a written notification of a confirmed positive test, the applicant or employee may request a retest of the specimen at a licensed laboratory at his or her own expense.

Confirmatory Requirements

All positive initial tests shall be confirmed using gas chromatography/mass spectrometry (GC/MS) or an equivalent or more accurate scientifically accepted method approved by the **Agency for Health Care Administration or the United States Food and Drug Administration** as such technology becomes available in a cost-effective form.

Cut-off Levels

The required levels are as follows: 21

Marijuana 50/15, Cocaine 300/150, Amphetamines 1000/500, Opiates 2000/2000, Phencyclidine 25/25, Barbiturates 300/150, Benzodiazepines 300/150, Methadone 300/150.

Drug Testing Service Providers

CWR will use the professional services of:

- A laboratory licensed by Florida's Agency for Health Care Administration or use criteria established by SAMHSA. If the results are positive, the testing facility will maintain the specimen for a at least 210 days.
- Qualified collection facilities, and
- A licensed Medical Review Officer (MRO).

Collection Pre-Employment

Applicants subject to the Department of Transportation (DOT) drug testing rules and regulations will be required to complete a specimen collection using chain-of-custody procedures established by **the (FMCSA) Federal Motor Carrier Safety Administration** to ensure proper recordkeeping, handling, labeling and identification of all specimens collected/tested. CDL applicants are required to use a chain of custody from Foley Services and complete a 10-panel urine drug test. CWR must receive a negative test result before permitting the applicant to begin employment.

NON-CDL applicants will use a chain of custody from a licensed or certified laboratory (not the chain of custody from Foley Services) and a Rapid 10-panel drug test will be administered at the collection site. The NON-CDL employee can begin employment when the employer receives a negative test result from the collection site.

All urine collections will be split into two separate samples. When a second test of a sample must be conducted, it will be from the second half of the split sample. A specimen for a drug test will be taken or collected by a qualified person employed by a licensed or certified laboratory.

Collection for CDL Random Drug Testing:

Random drug and alcohol testing will be scheduled quarterly by Foley Services for all employees subject to the Department of Transportation (DOT) drug testing rules. The names randomly selected through Foley Services will be given to the dispatcher of the location, who will escort the employee to a collection site within 48 hours of notification. If an employee is not present on the day of testing, they will be required to complete the testing on the first day they return to work.

Collection for NON-CDL Random Drug Testing: Each quarter, CWR will pull an active list with the names of all NON-CDL employees. The names will be entered into an e-screening program to generate a random list for drug testing. An onsite collector will administer a saliva drug test (oral mouth swab) for NON-CDL employees whose names were randomly selected. If the test is negative, the employee will return to work. If the test is non-negative, the employee will be required to go to a licensed or certified laboratory to complete a urine 10-panel drug test. A supervisor will take the employee to the collection site and wait with the employee until the test is complete. A negative drug test result is required before the employee can return to work.

If an employee is not present on the day of testing, they will be required to complete the testing on the first day they return to work.

Collection Post-Accident: Drug and alcohol tests are required post-accident. When an accident occurs, a drug and alcohol test will be administered onsite. The employee will be allowed to finish their shift if the result is negative. If the result is non-negative, the employee will be required to go to an onsite collection site to be tested.

CDL: The employee is required to be tested by the lab within 36 hours regardless of whether the onsite test is negative or non-negative.

Collection Reasonable Suspicion: Any employee who appears to be under the influence of drugs or alcohol will be given a drug and alcohol test from an onsite collector. If the test result is negative, the employee can continue to work. If the test result is non-negative, the employee will be required to be tested by a licensed or certified laboratory for confirmation. CWR must receive a negative drug and alcohol test result before the employee can return to work. Refusal to test will result in termination.

Chain of Custody:

For Drug and Alcohol testing, CDL drivers will provide the collection site with a chain of custody from Foley Services. The results will be automatically uploaded to Foley and housed with their driver file. Non-CDL employees will use a chain of custody from the collection site and the results will be housed at the CWR Corporate office.

Laboratory Confirmation and MRO

If an initial screen is non-negative, the laboratory will conduct a confirmation test. The confirmation test will be by gas chromatography/mass spectrometry ("GC/MS"). All laboratory test results are reported to the Medical Review Officer ("MRO"). Medical review is required for both negative and positive results. If the test result is reported as positive, the MRO will contact the donor. The donor will be given the opportunity to discuss the test result with the MRO. If the employee timely presents documentation of authorized medical use of the drug(s) detected in the specimen, that is acceptable to the MRO, the MRO will declare the test negative.

The MRO will accept only valid prescriptions and documentation of drugs used in medical treatment. Use of drugs obtained outside the U.S., use of medications prescribed to persons other than the donor, use of food products containing drugs (including hemp products), and use of marijuana, heroin, or other Schedule I drug for health or medicinal purposes, may not be accepted by the MRO as legitimate medical explanations of a positive result.

The employee's interview with the MRO is confidential, and medical information other than the test result determination will not be shared with the employer or any other party, except where required by law, a court of jurisdiction, or where the MRO believes the information provided affects the safety of the workplace or the public. This means that any information provided by the employee to the MRO, such as medications or other substances that will or may present a significant safety risk, the MRO will report a safety concern to CWR. In circumstances that require the MRO to report a safety concern, CWR will require the applicant/employee to provide fitness for duty documentation from his/her personal prescribing physician.

Negative Dilute

When a urine specimen result is reported by the MRO as negative dilute, the employee will be sent for a repeat test. The results of the second test will be accepted as final.

Notice of Policy

A notice of the employer's drug-testing policy must also be posted in an appropriate and conspicuous location on the employer's premises, and copies of the policy must be made available for inspection by the employees or job applicants of the employer during regular business hours in the employer's personnel office or other suitable locations.

Notice of Test Results

Employees may request a copy of their negative test result within 5 days of receipt of the result. Written notice of the test result must be provided to donor within 5 days of receipt of a confirmed positive from the laboratory or MRO.

Notification to Laboratory

Employees or job applicants are responsible for notifying CWR's laboratory of any administrative or civil action brought pursuant to Florida Statutes Annotated, Section 440.102.

Rebuttal Opportunities

An employee or job applicant who receives a positive confirmed test result may contest or explain the result to CWR's medical review officer within five (5) working days after receiving written notification of the test result. If an employee's or job applicant's explanation or challenge is unsatisfactory to the medical review officer, the medical review officer will report

a positive test result back to CWR. A job applicant or employee may contest the drug test result pursuant to law or to rules adopted by the **Florida Agency for Health Care Administration**.

Right to Explain

Both before and after being tested, employees and job applicants may confidentially report the use of prescription or non-prescription medications to CWR's MRO.

Written Policy

Prior to testing applicants and employees, an employer shall provide all individuals with a copy of a written policy. Also, a copy of the policy must be given to employees sixty (60) days prior to implementation of the program. An employer shall include notice of drug testing on vacancy announcements for positions for which drug testing is required.

Alcohol-Use Exceptions

There may be occasions when it is permissible to consume reasonable amounts of alcohol on CWR property during work time if consumption of alcohol is authorized in advance in writing by an authorized member of CWR's management.

Examples of occasions that might qualify for exemption include CWR functions or business functions, consumption after regular business hours, at professional events or professional association meetings, or while traveling on business or marketing/entertaining clients or potential clients.

Notwithstanding the foregoing exceptions, employees understand that it is a violation of this policy to drive any vehicle if a manager has reasonable cause to believe that an employee authorized to consume alcohol under this section is under the influence of alcohol, or the employee believes that he or she is under the influence of alcohol. Managers or employees who find themselves in these circumstances are expected to ensure that the involved employee or employees do not drive while being impaired.

Company Policy

The following exceptions, while permitting alcohol consumption, do not authorize an employee to be "under the influence" of alcohol or operate a Company vehicle after consuming alcohol:

Alcohol-Use Circumstances

- Who must authorize on-duty alcohol use? President - CWR
- Will drinking be permitted at company-sponsored events? YES
- Will drinking be permitted at professional functions/meetings? YES
- Will drinking be permitted while traveling and/or entertaining on behalf of CWR? YES
- Will CWR pay for transportation/hotel expenses for an employee who is under the influence and unable to drive? YES
- Are employees permitted to consume alcohol and then operate a Company vehicle or any other vehicle while representing CWR? NO

FMCSA CLEARINGHOUSE REPORTING

Effective January 6, 2020, the Federal Motor Carrier Safety Administration ("FMCSA") requires employers to comply with the requirements of the Drug and Alcohol Clearinghouse. Employers are required to:

- conduct checks of new applicants for safety sensitive positions covered by the applicable regulations; and
- report instances of violations of the federal drug and alcohol laws applicable to commercial drivers, including positive drug tests administered by employers.

Upon receiving a job offer, every candidate offered a position in a safety sensitive position will be required to complete a General Consent for Limited Queries of the FMCSA Clearinghouse. This consent for limited inquiries will be valid for a period of three (3) years after it is signed by the employee. If necessary, in order to determine eligibility for a safety sensitive position, employees will be requested to execute a consent for a full query of the FMCSA Clearinghouse that will apply for a single, full query.

Pursuant to 49 CFR § 382.601, candidates and employees are notified through this policy that CWR must report the following events via the Clearinghouse.

- A verified positive, adulterated, or substituted drug test result;
- An alcohol confirmation test with a concentration of 0.04 or higher;
- A refusal to submit to a drug or alcohol test;
- Actual knowledge of;
 - On duty alcohol use pursuant to 49 CFR § 382.205;
 - Pre-duty alcohol use pursuant to 49 CFR § 382.207;
 - Alcohol use following an accident pursuant to 49 CFR § 382.209;
 - Drug use pursuant to 49 CFR § 382.213;
- A substance abuse professional's report of the successful completion of the return-to-duty process;
- A negative return-to-duty test; and
- An employer's report of completion of follow-up testing.

Pursuant to federal law, if a driver or employee in a safety-sensitive position has properly registered through the Clearinghouse, he or she will receive notice of all information submitted about him or her and will have the opportunity to address or dispute that information.

MEDICAL MARIJUANA

If an applicant or employee with a legal referral for marijuana (for the treatment of a medical condition) tests positive based on the substance limits for the drug test, it will be reported by the lab as a "positive drug test" and will be treated in accordance with all other positive drug tests.

Employees and applicants shall be given an opportunity to provide any information relevant to the test, including identification of currently or recently used prescription or non-prescription medications as well as any legal referral for marijuana use for the treatment of a medical condition.

There are no additional exceptions for applicants or employees with legal referrals for marijuana.

WEAPONS IN THE WORKPLACE POLICY

It is our policy to strictly prohibit any employee, vendor, or customer from carrying any sort of weapon into our offices or job sites. Employees are permitted to bring weapons in their personal vehicles into our parking lots if they remain locked within such vehicle and the employee maintains a current and legal permit to carry the weapon. Such weapons may not be used for any inappropriate or illegal use. Any violation of this policy will result in immediate termination of such employee.

WORKPLACE VIOLENCE

Our Company maintains a zero-tolerance standard of violence in the workplace. The purpose of this policy is to provide all employees with guidelines that will maintain a workplace culture that is free of violence. Threats, either implied or direct, of any kind by an employee, client, vendor, or any other person are prohibited at the Organization. Such conduct will not be tolerated and will result in prompt and remedial action. An employee who exhibits violent behavior may be subject to criminal prosecution and shall be subject to disciplinary action up to and including dismissal. Violent threats or actions by a non-employee may result in criminal prosecution. The Company urges all employees to come forward to the human resource office in the event that they become aware of any type of potential or actual threat or in any situation in which they observe or learn of a conflict within the workplace. An immediate investigation will occur when

any such report is made. Retaliation against a person who makes a complaint regarding violent behavior or threats of violence made to such person is also prohibited.

DEFINITIONS:

- *Workplace Violence*: Behavior in which an employee, former employee or visitor to a workplace inflicts or threatens to inflict damage to property, serious harm, injury, or death to others at the workplace.
- *Threat*: The implication or expression of intent to inflict physical harm or actions that a reasonable person would interpret as a threat to physical safety or property.
- *Intimidation*: Making others afraid or fearful through threatening behavior.
- *Zero-tolerance*: A standard that establishes that any behavior, implied or actual, that violates the policy will not be tolerated.
- *Court Order*: An order by a Court that specifies and/or restricts the behavior of an individual. Court Orders may be issued in matters involving domestic violence, stalking or harassment, among other types of protective orders, including Temporary Restraining Orders.
- *Domestic Violence*: While often originating in the home, domestic violence can significantly impact workplace safety and the productivity of victims as well as co-workers. Domestic violence is abuse committed in an intimate relationship (regardless of marital status, age, race, or sexual orientation) against an adult or fully emancipated minor. In this context, abuse is the intentional reckless attempt to cause bodily injury, sexual assault, threatening behavior, harassment, or stalking, or making annoying phone calls to a person who is in any of the following relationships:
 - Spouse or former spouse
 - Domestic partner or former domestic partner
 - Cohabitant or former cohabitant and or other household members
 - A person with whom the victim is having, or has had, a dating or engagement relationship
 - A person with whom the victim has a child

PROHIBITED BEHAVIOR:

Violence in the workplace may include, but is not limited to the following list of prohibited behaviors directed at or by a co-worker, supervisor, or member of the public:

- Direct threats or physical intimidation
- Implications or suggestions of violence
- Stalking
- Assault of any form
- Physical restraint, confinement
- Dangerous or threatening horseplay
- Loud, disruptive or angry behavior or language that is clearly not part of the typical work environment
- Blatant or intentional disregard for the safety or well-being of others
- Commission of a violent felony or misdemeanor on the Organization property
- Any other act that a reasonable person would perceive as constituting a threat of violence

REPORTING ACTS OR THREATS OF VIOLENCE:

An employee who is the victim of violence, believes they have been threatened with violence, or witnesses an act or threat of violence towards anyone else shall take the following steps:

- If an emergency exists and the situation is one of immediate danger, the employee shall contact the local police officials by dialing 9-1-1 and may take whatever emergency steps are available and appropriate to protect himself/herself from immediate harm, such as leaving the area.
- If the situation is not one of immediate danger, the employee shall report the incident to the appropriate supervisor or manager as soon as possible and complete the Organization Workplace Violence Incident Report Form.

PROCEDURES – FUTURE VIOLENCE:

Employees who have reason to believe they, or others, may be victimized by a violent act sometime in the future, at the workplace or as a direct result of their employment with the Organization, shall inform their supervisor by immediately completing a Workplace Violence Incident Report Form so appropriate action may be taken. The supervisor shall inform his/her Department Director or designee, the Director of Human Resources, and the local law enforcement officials.

Employees who have signed and filed a restraining order, temporary or permanent, against an individual due to a potential act of violence, who would be in violation of the order by coming near them at work, shall immediately supply a copy of the signed order to their supervisor. The supervisor shall provide copies to the Department Director, the Director of Human Resources, and local police.

A. INCIDENT INVESTIGATION: Acts of violence or threats will be investigated immediately in order to protect employees from danger, unnecessary anxiety concerning their welfare, and the loss of productivity. The employee's Department Director will cause an investigation to be initiated into potential violation of work rules/policies. Simultaneously, the Department Director will refer the matter to local police for their review of potential violation of civil and/or criminal law. Procedures for investigating incidents of workplace violence include:

- Visiting the scene of an incident as soon as possible
- Interviewing injured and threatened employees and witnesses
- Examining the workplace for security risk factors associated with the incident, including any reports of inappropriate behavior by the perpetrator
- Determining the cause of the incident
- Taking mitigating action to prevent the incident from recurring. – Recording the findings and mitigating actions taken

In appropriate circumstances, the Organization will inform the reporting individual of the results of the investigation. To the extent possible, the Organization will maintain the confidentiality of the reporting employee and the investigation but may need to disclose results in appropriate circumstances; for example, in order to protect individual safety. The Organization will not tolerate retaliation against any employee who reports workplace violence.

B. MITIGATING MEASURES: Incidents which threaten the security of employees shall be mitigated as soon as possible following their discovery. Mitigating actions include:

- Notification of law enforcement authorities when a potential criminal act has occurred
- Provision of emergency medical care in the event of any violent act upon an employee
- Post-event trauma counseling for those employees desiring such assistance
- Assurance that incidents are handled in accordance with the Workplace Violence Prevention policy
- Requesting the Organization's attorney file a restraining order as appropriate

EMPLOYMENT APPLICATIONS

We rely upon the accuracy of information contained in the employment application and the accuracy of other data presented by you throughout the hiring process and employment. Any misrepresentations, falsifications, or material omissions in any of this information or data may result in your exclusion from further consideration for employment or immediate termination.

PRE-EMPLOYMENT PROCESS

Following the interview and offer of employment, all potential employees will be required to submit to a physical and drug screen. Offers of employment are contingent upon receiving a negative drug screen result. Any applicant with a positive drug screen may reapply after six months to be reconsidered for employment.

IMMIGRATION LAW COMPLIANCE

C.W. Roberts Contracting, Inc. employs United States citizens and aliens who are authorized to work in the United States and does not discriminate against employees or job applicants on the basis of citizenship or national origin. Our company utilizes the E-Verify services of the U.S. Citizenship and Immigration Service.

The Immigration Reform and Control Act of 1986 requires that each new employee complete the Employment Eligibility Verification Form I-9 and present documentation establishing identity and employment eligibility. Current employees may be required to update Form I-9 from time to time as requested by management. Provision of the required information and timely completion of I-9 form is a condition of employment.

INTRODUCTORY PERIOD

For every new employee, the first 90 days of employment is an introductory period for both you and the Company. During this time, you will have the opportunity to learn about the Company, your job, and your new surroundings. Your supervisor will be available to answer any questions that you may have.

During this period your job performance, attendance, attitude, and overall interest in your job will be carefully reviewed by your supervisor. The Company will then evaluate your performance and make a decision concerning your continued employment. You also have an opportunity to evaluate us during your first 90 days and decide if your job is right for you.

By signing the receipt for this handbook, you understand and agree that as a condition of employment, a 90-day introductory period with C.W. Roberts Contracting, Inc. is required. If your job performance is unacceptable, you may be asked to leave at any time.

If, as a result of an illness or injury, you are absent from work for more than five days during your introductory period, we may choose to extend your introductory period as necessary to give you a fair opportunity to demonstrate your ability to do the job. If your introductory period is extended, you will be notified.

Should an employee's performance become unsatisfactory at any time during this introductory period, the employee will be subject to termination at that time. Completion of the introductory period does not confer any expectation of continuation in employment; continuation depends on the needs of the Company and the performance and conduct of the employee.

EMPLOYEE STATUS

Full-time employees: Are those employees who are regularly scheduled to work 30 hours or more per week on average. Full-time employees are eligible for all the benefits set forth in the following pages.

Part-time employees: Are those employees hired for part-time positions who are scheduled to work less than 30 hours per week on average. Part-time employees are not eligible for benefits.

If you have any questions concerning your status or the benefits for which you qualify, please contact the Director of Human Resources.

REHIRED EMPLOYEES

C.W. Roberts Contracting, Inc. will consider rehiring individuals who voluntarily terminated their previous employment and were in good standing. Former employees re-applying for employment are subject to compliance with all employment policies in effect upon their re-application for employment. Prior work performance and attendance will be considered.

Application for Re-Employment:

A former employee must complete a new employment application and shall follow the same interview and selection process as any other candidates. This includes pre-employment drug testing and background screening.

Rehire Status:

Former employees will be considered for re-hire if they voluntarily terminated employment. If a former employee involuntarily terminated, the Area Manager will make the determination as to whether the person is eligible for rehire.

Employment Dates:

When an employee is rehired, the date started needs to reflect their rehire date. The Original Hire Date should not be reinstated.

Insurance Benefits:

If an employee is rehired **within 30 days from separation**, their insurance benefits will be reinstated the first of the month following their rehire date.

If an employee is rehired **over 30 days from separation**, he/she must wait the standard waiting period to re-enroll.

Performance Reviews:

If an employee is rehired, they will receive a performance review annually on their anniversary date. The anniversary date is one year from the rehire date, not the original start date.

Vacation:

When an employee is rehired, vacation accrual begins with their new rehire date.

401k Retirement Savings Plan Eligibility: Rehired employees are eligible to participate immediately in the 401k program if they completed 6 months while previously employed.

INTERNAL COMPANY TO COMPANY TRANSFERS

On occasion, an employee may request a transfer to another CPI subsidiary due to relocation, promotion, or other reasons. In these cases, the employee must complete all required new hire paperwork and successfully complete the pre-employment drug screening and background check. The receiving company will honor the original start date and Human Resources will coordinate with all necessary departments to ensure a smooth transition.

Benefits will be available to the employee on the first day of the transfer to the receiving company. The Human Resources departments will work together to ensure there is no break in benefit coverage when the employee transfers to the new location. Benefits to coordinate include insurance, 401k savings plan, Employee Stock Purchase Plan, Years of Service award, Bonus, and Vacation/Sick accrual.

WORK SCHEDULE

The official work week for C.W. Roberts Contracting, Inc. begins at 12:00 a.m. on Sunday morning and ends at 11:59 p.m. on Saturday night.

Due to changing production requirements, the number of days/nights per week and the number of hours per day may vary. Your supervisor will decide the hours needed to accomplish each specific job and may change the work schedule according to the needs of the company. You will be notified in advance, if possible, of any changes to your work schedule.

1. It is very important that each employee come to work as scheduled by their supervisor. In the event you must be absent from work, you must personally notify your supervisor as far in advance as possible on the day of your absence.

Any employee-requested deviations from the assigned work schedule must be approved in advance, by your supervisor. Reasonable efforts will be made to accommodate employee schedules in alignment with organizational needs.

Flexible schedule may be permitted when the requirements of the position and the organization can be met.

Periodic work breaks are 15 minutes in duration and paid.

Full-time employees are also provided with an unpaid lunch period. Your supervisor will advise you of your schedule.

Supervisors may adjust the work hours of an employee to accommodate hours worked at times outside their normal or expected schedule.

2. If an employee shows up for work as scheduled and is sent home, the employee will receive 2 hours pay for show-up time. If the supervisor notifies the employees in advance that they should not report to work, the employee will not be paid.
3. All employees are required to have their own transportation to the job site or home office (the office where you were hired), with unpaid travel time.

4. As a convenience to the employee, the company may offer to provide employees with transportation from the home office to the job site. It is very important that you arrive on time to ride in a company vehicle. In this situation, employees will be paid for their travel time to the job site, based on the miles schedule below. The driver of the company vehicle will be paid for commute time both ways. Travel time does not affect show-up time policy.

Miles Schedule

41 – 75 Miles from the home office to the job site	1 hour per day, one-way
76 – 90 Miles from the home office to the job site	1.5 hours per day, one-way
> 90 Miles from the home office to the job site	Paid for commute time both ways

5. Per Diem allowance while out of town will be \$35.00 per day when there is an overnight stay. Employees who use a company credit card to pay for their meals will not receive a per diem allowance and should not be charging meals for employees who are receiving a per diem allowance.

PAY SCHEDULE

You will be paid on a weekly basis for the official work week, Sunday through Saturday. Your pay will be deposited directly into your bank account via direct deposit; we do not issue pay checks.

Payroll deductions are made automatically for any items required by law to be deducted including Social Security, Medicare, Federal Income Taxes, and any other items you authorize. Your final earnings will be deposited into your bank account or your pay card.

Each employee is responsible for accessing their own pay statement through Doculivity on the normally scheduled pay day.

Any questions or concerns about your pay or deductions should be brought to the attention of your supervisor immediately.

Prior to receiving your final pay, an exit interview with your supervisor is requested. You must return all assigned community property to your supervisor.

TIMEKEEPING PROCEDURES

You are advised to keep an accurate record of the hours you work each day and each week. Your supervisor will record your hours worked and submit the information to payroll. If you have any questions or concerns about the accuracy of time or wages, you must notify your supervisor within 14 days of receiving your pay stub.

OVERTIME AND SHIFT DIFFERENTIAL

The Company may periodically schedule mandatory overtime or weekend work in order to meet business or customer needs. We will attempt to give you as much advance notice as possible, and we expect that all employees who are scheduled to work overtime will be at work, unless excused by their supervisor. You will be paid one and one-half (1.5) times for all hours worked beyond 40 hours in a work week (seven day pay period). However, you are to work only the hours scheduled, unless authorization from your supervisor has been given in advance.

If you are scheduled to work the night shift, you may have the opportunity to receive shift differential per

supervisor approval. The current rate for shift differential is \$1.00 per hr.

STABLE PAY BENEFIT

Effective March 17, 2024: Without modifying any hourly employee's regular or overtime hourly rate, hourly employees designated by C.W. Robert's Contracting Inc. (the Company) as a Stable Pay Benefit employee will be compensated for a minimum of 32 hours of work at their regular hourly rate provided that the employee is available to work each shift of the work week as defined by the Company. Stable pay will be paid out at employees' regular hourly pay and will not increase even if the employee is scheduled for nights that week. For purposes of this benefit, an hourly employee shall be considered:

1. Available to work if their immediate supervisor has pre-approved their absence as vacation, the hourly employee has vacation available, and the request was given within the timeframe outlined in the employee handbook for requesting vacation.
2. Unavailable if their absence is considered unexcused or some other form of unpaid time off.
3. Unavailable if they are asked by any C.W. Robert's Contracting Inc. supervisor to report to work for any shift, including a Saturday or Sunday shift, and they fail to report for work.
4. Unavailable if they are unable to work their entire shift, unless pre-approved by their immediate supervisor.
5. Unavailable if they do not work their full shift without prior approval for the absence. For example, an employee arrives late to the job site or informs the supervisor that they need to leave early without prior knowledge or approval. A Short Shift disqualifies an employee's eligibility for Stable Pay benefits for that week.
6. Eligible for Stable Pay benefits for the week if excused from work due to illness or medical reasons. Sick pay will not disqualify an employee from receiving stable pay, but it will count toward the 32 hours. Medical leave of absence doesn't apply to stable pay.

Purpose: Stable Pay will provide all eligible hourly employees with a steady income throughout the year, especially when work is unable to be performed due to **unpredictable circumstances**. This benefit will help motivate hourly employees to come to work, help with our company's retention and increase employee morale. December shutdown is not considered "unpredictable circumstances" and does not apply to stable pay. Holidays and Vacation time will not disqualify an employee from receiving stable pay, but it will count toward the 32 hours.

Eligibility: All hourly field employees who have successfully completed 60 days of employment with the Company are eligible for Stable Pay. Stable Pay will start on the first pay date of the month following 60 days of employment. The benefit will run all year long.

Termination: Any eligible employee who is terminated for any reason will forfeit any, and all unpaid Stable Pay benefit.

Administration: Timekeepers, Foreman, and Supervisors will need to make sure that each timecard entry is accurate regarding attendance for hourly employees since this will have a tremendous financial impact on the Company. The pay type entered would determine if that hourly employee will be eligible for Stable Pay benefits that week based on work availability.

In the event an employee works out of town during the week, they will be guaranteed 40 hours.

Examples of pay types:

Pay Type – Regular: This pay type should be used for regular pay for all hourly employees. Entry of Regular pay grants employee access to Stable Pay benefits.

Pay Type – No Work Available (N0.25): This pay type should only be used when an hourly employee is unable to work due to weather or lack of work. This pay type should not be used when an hourly employee is unable to work for personal reasons. This Pay Type does not apply to Saturday, Sunday, or Holiday. No Work Available grants employee access to Stable Pay benefits.

Pay Type – Unpaid Time Off (U0.25): This pay type should be used when an employee has approved leave but has no additional paid time off available for use or has decided to take approved time off as unpaid leave. This Pay Type does not apply to Saturday, Sunday, or Holidays. An approved absence consists of those instances where an employee has provided advance notice (minimum of 30 minutes) so that they will not be able to attend work. Entry of Unpaid Time Off disqualifies an employee's eligibility for Stable Pay benefits for that week.

Pay Type – Unexcused Time Off (X0.25): This pay type is used when an employee has not been approved for leave and is absent from work without the permission of his supervisor. This pay type can apply to a Saturday, Sunday, or Holiday if an employee was otherwise required to report for work. This pay type is also utilized for no call no show, call in after scheduled start time and no show after a call in or any unplanned absence. Entry of Unexcused Time Off disqualifies an employee's eligibility for Stable Pay benefits for that week.

Pay Type – Vacation (P8): This pay type is used when an employee has requested to use vacation in advance for a planned day off that has been approved. Using vacation for a planned event provides employees with eligibility for the Stable Pay benefits. This type of pay is not to be utilized for unplanned events such as an employee who overslept and wants to use vacation for that day.

Pay Type - Sick (S8) This pay type is used when an employee is not available to work due to illness or for medical reasons. Entry of Sick does not disqualify an employee's eligibility for Stable Pay benefits for that week, but it does count toward the 32 hours. Medical Leave of Absence doesn't apply to stable pay.

SAFE HARBOR COMPLIANCE

It is our policy to comply with the salary-based requirements of all existing wage laws. Therefore, we prohibit all organizational leadership from making any improper deductions from employees who are not eligible for overtime. If you believe that any improper deduction has been made to your salary, you should immediately report this information to your direct supervisor, or to Human Resources. Reports of improper deductions will be promptly investigated. If it is determined that an improper deduction has occurred, you will be promptly reimbursed for any improper deduction made.

EMERGENCY MEDICAL CARE

While rare, an employee medical emergency may occur at work. A medical emergency might be related to an employee's health event, such as stroke or heart attack or could result from an accident, such as a cut or fall.

Should a medical emergency occur, and the employee is capable of effectively interacting with others, the employee should report the emergency to their supervisor and participate in determining the best course of action for medical attention. If the employee is determined to be unresponsive, "911" should be called for Emergency Medical Services (EMS). The caller should follow the prompts from EMS to provide interim care. Upon arrival, EMS will assume responsibility for the care of the employee.

EMERGENCY CONTACT INFORMATION

Each employee is provided with an emergency contact form upon hire. This document is used to determine who should be contacted in the event a medical or other emergency occurs at work. This form may also be used as an alternative contact for the employee, should we be unable to contact the employee using other known methods. It is the responsibility of the employee to keep the emergency contact information updated. Employees should contact the Human Resources Department to revise the information any time there is a change in the individual the employee wants to contact or the method of reaching the emergency contact.

The emergency contact form is confidential and will be maintained in the employee's personnel file and will be accessed only in the event of an emergency or when previously known contact information for the employee has been unsuccessful.

BENEFITS

The employee benefits that are detailed below provide a summary reference to our current offerings. Our benefits change periodically to continue to best support our employees in a cost-effective manner. The benefits shown here should not be viewed as an employee "right" or construed in any way as an ongoing obligation of the Organization.

SICK LEAVE

Effective January 1, 2017, all full-time employees will be awarded 7 paid sick days on January 1st of each year. New employees will receive 7 paid sick days after completing 90 days of service. When an employee reaches 10 years of service or more, the employee will receive 10 paid sick days annually.

Employees are allowed to carry over sick days and maintain a maximum balance of 60 sick days. No additional time will be awarded until the balance is decreased. Upon the termination of employment, any unused vacation days, sick days, or wages associated with the unused days will be forfeited.

If illness or an emergency prevents an employee from coming to work, the employee should personally notify their supervisor prior to their scheduled starting time. This will give the supervisor time to find a replacement if needed. At times, the supervisor might ask the employee to furnish a release from their doctor before returning to work. This will be at the employee's expense. The employee is responsible for completing a Request for Time-off form for sick leave; indicating the days absent and whether the days will be paid from sick days earned. If an employee resigns following a request to use sick time, the time will be unpaid unless the absence is supported by a doctor's note.

HOLIDAYS

All full-time employees who complete 90 days of satisfactory work are eligible for the following paid holidays: New Year's Day, Memorial Day, Fourth of July, Labor Day, Thanksgiving Day (2), and Christmas Day.

When a scheduled holiday falls on a **Saturday**, the preceding Friday will be declared the observed holiday. When the scheduled holiday falls on a **Sunday**, the following Monday will be declared the observed holiday, unless otherwise directed by the President of the Company.

Employees must work the day before the holiday and the first scheduled day following the holiday to be eligible to receive holiday pay, unless your supervisor approved a request for time off.

DECEMBER SHUTDOWN

CWR shuts down operations every year beginning on December 25th through New Year's Day. Full-time employees with one-year of continuous service will receive paid time during the week of shutdown, as well as holiday pay for Christmas Day and New Year's Day. Employees must work the day before the holiday and the first scheduled day following the holiday to be eligible to receive holiday pay, unless a request for time off was granted by your supervisor. Employees with less than one year of service will not receive paid time during the week of shutdown. Employees will have the option to work during shutdown or request time off without pay. Employees with 90 days of service will receive holiday pay for Christmas Day and New Year's Day.

VACATION

HOURLY NON-EXEMPT EMPLOYEES:

After one-year of continuous service, hourly employees will receive FIVE vacation days to be used by the end of their anniversary year. Following the end of the anniversary year, employees will receive five vacation days on Jan. 1st each year, to be used during the calendar year. This is in addition to paid time during the December shutdown.

After five-years of continuous service, hourly employees are eligible for a total of TEN vacation days during their anniversary year. Following the end of their anniversary year, employees will receive ten vacation days on Jan. 1st each year, to be used during the calendar year. This is in addition to paid time during the December shutdown.

SALARIED EXEMPT EMPLOYEES:

After 90-days of service, salaried employees are eligible for FIVE vacation days to be used during the year in which they were hired. Following the end of their anniversary year, salaried employees will receive five vacation days on Jan. 1st each year, to be used during the calendar year.

After one year of continuous service, salaried employees will also receive paid time during the December shutdown.

After five years of continuous service, salaried employees are eligible for a total of TEN vacation days during their anniversary year. Following the end of their anniversary year, employees will receive ten vacation days on Jan. 1st each year, to be used during the calendar year. This is in addition to paid time during the December shutdown.

Salaried employees who request time-off (beyond hours accrued), must submit the request to the President of the company. Professional discretion will be used in granting requests.

ALL EMPLOYEES:

Employee's request for vacation should be written on a Request for Time-off form and submitted to their supervisor at least two weeks in advance. This will allow the supervisor to find a replacement if needed. **If you are requesting time off during the month of December, the request must be submitted prior to December 1st to be considered. Requests for time off will not be accepted after December 1st of the calendar year.**

Approval for time off will be made by the employee's supervisor based on periods convenient to the operation of the business. If a request for time off is denied, a maximum of five vacation days can be carried over to the next year with supervisor's approval. The days must be used by June 30th of the year in which the days are carried forward.

Employees do not have the option to receive a cash payment for vacation time unused. If an employee does not return to work following a vacation (resigns), the employee will not be paid for the time off. Under no circumstances will an employee be allowed to borrow against hours to be earned in the future.

CONTAGIOUS ILLNESS POLICY

The Organization owes an obligation to the entire workforce to prohibit employees who have an infectious condition, illness, or injury from working until such time that an infected employee can produce written verification from a licensed physician that the condition is no longer contagious. The Organization shall work with immense diligence to protect the private health information of the infected employee; however, all employees must also recognize the need to alert other employees of infectious conditions that may have impacted others, particularly those with sensitive medical conditions including pregnancy, immune deficiency conditions, etc. Records of employee medical examinations shall be kept in a separate and confidential file.

Employees with contagious conditions that may pose health risks to others agree that they will report such conditions to the human resource department for appropriate guidance and management immediately upon learning of the condition. An employee who reports for duty with a suspected infectious condition shall be sent home and referred to their personal physician for further evaluation. Following the medical evaluation, the employee may return to work with a physician's statement that indicates the employee is free of an infectious condition.

When reporting for duty after recovering from an infectious condition, the employee shall present the physician's statement to human resources that states the employee is free of the infectious condition before being allowed to return to work. No employee shall return to work with temperature elevation, draining skin lesions, a communicable rash, or a communicable disease. Such employees may pose a direct threat to the health and safety of the other employees and our customers.

ABSENTEEISM AND TARDINESS POLICY

Each of our employees plays an important role in getting the day's work done. Therefore, each employee is expected to be at his or her workstation on time each day. Absenteeism or tardiness, even for good reasons, is disruptive to our operations and interferes with our ability to satisfy our customers' needs.

Excessive absenteeism or tardiness can result in discipline up to and including termination. A no-call/no-show for two consecutive days is considered a voluntary resignation due to job abandonment.

If you are going to be late or absent from work for any reason, you must personally notify your supervisor as far in advance as possible so that proper arrangements can be made to handle your work during your absence. Of course, some situations may arise in which prior notice cannot be given. In those cases, we expect you to notify your supervisor as soon as possible. Leaving a message does not qualify as notifying your supervisor – you must personally contact your supervisor.

When absence is due to illness, the Company reserves the right to require appropriate medical documentation.

CIVIC DUTIES

We encourage each of our employees to accept his or her civic responsibilities. As a good corporate citizen, we are pleased to assist you in the performance of your civic duties.

JURY DUTY:

Full-time employees (regardless of their employment date) will be excused from work the number of days they are called to report for jury service (jury summons) or to serve on a jury panel. Employees will receive their base hourly rate of pay for the hours they serve, not to exceed 8 hours for the day.

Employees are to provide their supervisor with a receipt of attendance. The receipt will be forwarded to the payroll manager.

If you are called to jury duty, please notify your supervisor immediately so we can plan the work activity with as little disruption as possible. Employees must notify their supervisor.

Employees who are released from jury service before the end of their regularly scheduled workday or who are not asked to serve on a jury panel are expected to call their supervisor as soon as possible and report to work if requested.

WITNESS DUTY:

An employee who is required by law to appear in court as a witness on behalf of the company will receive their regular pay during such time.

Employees who need to appear for cases not related to the company may take unpaid time off. The employee must request the time off from their supervisor and many need to provide evidence of the requirement to serve as a witness.

VOTING: We want every employee to have the opportunity to vote in every election. Generally, there will be sufficient time to vote either before or after your scheduled workday. However, if you foresee a problem getting to the polls, please notify your supervisor so that arrangements can be made.

BEREAVEMENT LEAVE

Full-time employees who have completed their introductory period are eligible to receive up to three days paid bereavement leave in the event they miss regularly scheduled workdays due to the death or funeral of a member of the employee's immediate family. Your immediate family includes a current spouse, children, stepchildren, parents or legal guardian, stepparents, grandparents, grandchildren, siblings, current mother/father-in-law, current son/daughter-in-law, and current brother/sister-in-law and any other relative residing in the same household.

An employee who is notified of a death in his or her immediate family while at work, will be paid for the remainder of the scheduled hours that day. The three-day eligibility for paid bereavement leave will commence on the next regularly scheduled workday when bereavement is requested.

All time off in connection with the death of one of the above-listed individuals, should be scheduled with your supervisor.

Proof of relationship may be required by your supervisor. A proven false claim for bereavement could result in suspension and/or termination of employment.

MEDICAL LEAVE OF ABSENCE

Full-time employees who have completed their introductory period are eligible for **unpaid leave** of absence for medical reasons. Medical reasons may include illness, injury, medical and surgical procedures, pregnancy, childbirth, and related medical conditions. Employees must request a leave of absence if they are unable to work for medical reasons for a period of more than three consecutive days. Such requests must be accompanied by a statement acceptable to the Company, from the employee's physician or a Company-approved physician indicating that the employee is unable to return to work. The Company retains the right to have employees on a leave of absence examined by a physician of the Company's choice.

Upon the employee's return from medical leave of absence, we will attempt to return the employee to his or her regular job if it is available. If it is not available, the employee will be placed in a similar job for which the employee

is qualified, if such job is available. If no jobs are available at the time, the returning employee will be given preferential consideration for any position for which he or she applies.

Failure to report to work as scheduled, following a leave, shall be cause for dismissal. Time spent on leaves of absence will not be used for computing benefits such as vacation or holidays.

MILITARY LEAVE OF ABSENCE

Employees who require time off from work to fulfill military duties will be treated in accordance with applicable requirements of state and federal laws. You are expected to notify your supervisor of upcoming military duty by providing them with a copy of your orders as soon as possible.

DOMESTIC VIOLENCE LEAVE POLICY

Any employee who has worked for the Company for a minimum of three months is entitled to take three days of unpaid leave if they or a member of their immediate household have been the victim of domestic violence and need to engage in any of the following activities: (1) to seek an injunction for protection against domestic violence or repeat of sexual violence, (2) to obtain medical care or mental health counseling for the employee of the household member to address issues resulting from domestic violence, (3) to obtain services from a victim services organization, (4) to make the employee's home secure from the perpetrator of domestic violence or to relocate to a new location to escape the perpetrator, or (5) to seek legal assistance to address issues that arose from the domestic violence or to attend or prepare for a court related proceeding relating to an act of domestic violence. Employees must provide appropriate advance notice to their supervisor of the need for leave unless they are prevented from doing so because of imminent danger. All employees must first exhaust any available annual vacation or sick leave before being eligible to use domestic violence leave.

PERFORMANCE EVALUATION

Generally, an employee's performance will be evaluated by their manager or supervisor at the end of their 90 Day introductory period. After that, it is C.W. Roberts Contracting, Inc.'s desire that evaluations be done annually during the month of the employee's anniversary date. The annual performance evaluation provides an opportunity for both employee and supervisor to take stock of the past year and review the needs and expectations for the coming year. If you do not receive an evaluation on an annual basis, you should notify your supervisor and request a review. Evaluations are an important factor in determining your future pay rate.

INTERNAL PROMOTION POLICY

C.W. Roberts Contracting, Inc. will promote employees based on their performance and workplace conduct. Acceptable criteria for promotion are:

- Experience in the job or tenure.
- High performance level in [two] recent review cycles.
- Skillset that matches the minimum requirements of the new role.
- Personal motivation and willingness for a change in responsibilities.

Managers should avoid making decisions for promotion based on recent or insignificant events.

C.W. Roberts Contracting, Inc. will not tolerate promotions that are based on:

- Managers' subjective opinions are unsupported by performance evaluations or metrics.

- Discrimination.
- Fraternization.
- Favoritism.
- Nepotism.

Promotions may occur when:

- A job opening is advertised internally as well as externally.
- A position opens unexpectedly, and our company wants to fill it from within.
- An employee has consistently good performance evaluations and their manager deems them ready for the next step in their career.
- An employee acquires a credential (licensure, degree etc.) that allows them to advance.

Process for standard promotions:

C.W. Roberts Contracting, Inc will establish a promotion review process to coincide with an employee's annual evaluation. During this process, managers may consider selecting employees to move to a higher-level position, or a position that better matches their skills and aspirations. Spontaneous promotions may also occur if business needs arise.

Managers should follow this process:

1. Meet with employees to talk about their career goals and/or aspirations for a promotion.
2. Identify opportunities to promote one or more team members, if applicable (by either filling vacancies, creating new jobs or enhancing job titles.)
3. Discuss the promotion with [*HR/ direct supervisor/ department manager*] to receive approval. Managers should also ask HR about the new position's salary range and any new benefits they should present to their team members.
4. Arrange a meeting with the employee to determine whether they would be happy with this career move.

Managers must keep detailed records of the process to support their decisions to promote employees.

We encourage hiring managers to post job openings internally. Hiring teams may post the job internally for a period of time before they post externally or post at both places at the same time. Internal candidates may be given priority in the hiring process since they are already familiar with our culture and expectations.

Job postings should include all requirements of a position, including the possibility of relocation.

Managers may often choose to expand employees' duties, authority, and autonomy without promoting them directly. For example, a salesperson may become a team leader, and a junior coder may begin participating in engineering operations.

These changes may not always come with a formal title change. Employees may be awarded a higher salary, bonuses, or other benefits. The new benefits depend on the position and are at the immediate supervisor's discretion.

EMPLOYEE STOCK PURCHASE PLAN

CWR is pleased to offer the Employee Stock Purchase Plan for all active full-time employees. Our parent company, Construction Partners Inc. has established an Employee Stock Purchase Plan that is administered by Bank of America / Merrill Lynch (BAML). With this exciting benefit, you may elect to have an after-tax payroll deduction that will be used to purchase shares of Construction Partners, Inc. stock (Nasdaq: ROAD) at a 15% discount from the lower of the price at the beginning of the quarter and the price at the end of the quarter. The minimum percentage an employee can contribute through payroll deduction is 1% of their total pay per week and the maximum is 15% per week. An employee may purchase no more than \$25,000 in stock in any calendar year.

Please see your office manager if you are interested in learning more about participating in this benefit and receiving

enrollment instructions. Employees will be required to enroll themselves through the BAML website. Please note, there are specific dates designated for enrollment. All enrollment periods will be open the first of the month prior to the start of a new quarter and will be open until the 15th of the month. For example:

When to Enroll	Offering Period
December 1 to December 15	Jan. 1 to March 31
March 1 to March 15	April 1 to June 30
June 1 to June 15	July 1 to September 30
September 1 to September 15	October 1 to December 31

If the price is lower at the beginning of the quarter, this price will be used to purchase the stock. If the price is lower at the end of the quarter, this price will be used. The 15% discount will be applied to the lower price for the purchase. The stock is purchased at the end of the quarter using the cumulative funds that have been deducted over the course of the quarter.

Payroll deductions will begin on the first pay date of the quarter, following enrollment. If an employee chooses to stop, increase, or decrease the percentage of their deduction, they can make one change per quarter. All changes must be entered through the BAML website.

RETIREMENT SAVINGS PLAN

The Company provides an excellent 401k Retirement Savings Plan for all employees! Employees who are 18+ years of age are eligible to participate on the first of the month, following 6 months of employment. Employees will be auto enrolled with a 3% pre-tax contribution when eligible. If an employee chooses to make a different contribution or decline participation, they must complete an enrollment/declination form and submit it to Human Resources or go to the Principal website to designate their election.

- The company will match 100% of an employee’s contribution of 3% or less
- The company will match 50% of the next 2% of an employee’s contribution

Any contribution above 5% is not matched by the Company but will be an investment toward retirement.

Matching contributions, made on or after January 1, 2017, are Qualified Matching Contributions and are 100% vested when made. Matching Contributions, made prior to January 1, 2017, are subject to the graduated vesting percentage.

All participating employees are provided with Summary Plan Description booklets and other materials as required by law. You may obtain additional information regarding the Plan through the Human Resources Department.

MEDICAL INSURANCE

We provide medical insurance coverage for our full-time employees who elect it. Coverage begins on the first day of the month following 60 days of employment. The Company currently pays a portion of the insurance premiums for our employees.

Our medical insurance plan is an excellent one. It provides the type of medical coverage needed to protect our employees and their families from catastrophic losses due to illness or injury. You may obtain additional information about this plan through the H.R. Benefits Administrator. For specific details concerning eligibility and coverage, please be sure to consult the insurance contract itself.

We all must recognize that the cost of our insurance plans is based upon how much it is utilized. Therefore, each of us

must work to utilize the cost containment of the policy. This will help to keep cost of our health care down and enable us to continue to provide this very valuable benefit.

LIFE INSURANCE

Supplemental life insurance for employees is available at a very low cost through payroll deductions. You may obtain additional information about the Plan by contacting Human Resources. For specific details concerning eligibility and coverage, please be sure to consult the insurance contract itself.

DISABILITY INSURANCE

The Company encourages employees to enroll in the Disability Insurance program. This is an excellent program that provides income to you in the event that sickness or an accident prevents you from working. You may obtain additional information through the Human Resources Department. For specific details concerning eligibility and coverage, please be sure to consult the insurance contract itself.

SOCIAL SECURITY INSURANCE

Each pay period, we deduct a percentage of your pay, match it with an equal amount of the Company's money, and send it to the government to be deposited in your Social Security account. If you are not familiar with the retirement and disability benefits provided under Social Security, check with the Payroll Department or your local Social Security office for a more complete explanation.

TRAINING AND EDUCATIONAL ASSISTANCE

The Company provides periodic training courses for qualified employees. In addition, full-time employees may be given the opportunity to attend training programs that will enable them to improve their skills and qualify for advancement. Educational assistance is provided at the discretion of the Company and may include tuition, books, and supplies. Advance approval by the Area Manager is required before any course is taken. Reimbursement is paid upon successful completion of an approved course with the employee receiving a grade of B- or better.

ONLINE TRAININGS / MEETINGS

Our Organization will periodically use resources available on-line to provide training for employees. You will be expected to participate and will be appropriately compensated for all time spent on the training, whether conducted during or outside of your normal work schedule.

TUITION REIMBURSEMENT POLICY

The C.W. Roberts Contracting, Inc. (CWR) Tuition Reimbursement Program ("Program") is designed to help employees further their knowledge, skills and job effectiveness through higher education in fields of interest to the company. With the Program, tuition reimbursement is offered to regular, full-time employees. Only courses taken at nationally recognized accredited colleges, universities and technical schools will be approved for reimbursement. Nationally recognized accreditations are those accredited by the U.S. Department of Education and/or those acknowledged by the American Council on Education.

The purpose of Program and educational reimbursement in general is to provide employees with appropriate opportunities to access education that enhances their abilities to perform in their current or future job responsibilities with CWR. Applicable formal education has a positive impact on an employee's contribution to the company, and a policy that supports educational reimbursement is an effective attraction and retention tool. Employees are encouraged to improve their education, skills and knowledge in areas that relate to their current or probable positions to which they may realistically transfer or progress in the future.

Training and formal education build the skills of CWR employees. Training is characterized as essential for the employee to perform his or her job and has a strategic purpose. Training typically is provided on company time and is paid for in full and directly by the Company. In contrast, formal education beyond that which is required by the position description enhances an employee's capabilities but is not essential for the employee to perform in the job. Formal education, once approved, is reimbursable through the Program.

If an employee is eligible for the Program, CWR will reimburse the eligible employee for their tuition and other mandatory, incidental expenses required for enrollment for all formal education upon the receipt of certification from the approved and accredited college, university or technical school confirming that the employee has successfully completed their approved courses with a grade of "C", or equivalent, or better (certification of completion is required for non-graded classes). Cost for room, board, books, travel, testing and field trips will not be reimbursed. Federal tax law allows employees to get up to \$5,250 in tuition reimbursement tax-free from their employer every calendar year. Reimbursement in excess of \$5,250 is considered taxable income by the IRS.

In order for an employee to be eligible for the Program, they must:

- Obtain approval by their Area Manager, the Vice President of their location and the President of the company before enrolling in the desired course(s) or degree program;
- Be a regular, full-time employee (temporary employees, intermittent employees, and/or summer interns are not eligible);
- Meet all performance expectations of his or her current position at all times prior to reimbursement;
- Have a completed Tuition Reimbursement Application, reviewed and approved by the Employee's Area Manager, Vice President of their location and the President of the Company with recognition that the educational investment is part of the employee's development for the current job or for a job to which he or she would realistically move to within CWR in the future;
- Ensure that the college, university or technical school is accredited or have recognized professional accreditation for specific courses to which the employee is enrolling;
- Complete the Tuition Reimbursement Form within sixty (60) days after the courses are completed and submit the form along with the transcripts, itemized receipts for tuition reimbursement to be processed, and any additional documents requested by CWR; and
- Not have an unexcused absence from work relating to their formal education, since CWR requires that time needed for formal education will be limited to the employee's vacation time off.

Notwithstanding anything to the contrary herein, termination of employment immediately terminates any right to any participation in the Program or right to tuition reimbursement and this Program is subject to change at any time without prior notice. Employees agree to stay employed with CWR for 2 years after receiving reimbursement. If the employee leaves the company before the end of the term, they will be responsible for reimbursing the company with any funds they receive.

COMPANY POLICIES AND PROCEDURES

Every city, nation, and society have rules for the orderly conduct of business. People cannot live and work together successfully and enjoyably without order.

This Company is the same way. We need to have certain reasonable policies and rules for the conduct of our business. Our most important rule is the "rule over reason." However, there are a few basic rules that should not be violated under any circumstances. Violation of any of these rules can result in immediate termination.

THE BASICS

Absenteeism and Tardiness: It is difficult for us to properly serve our customers when an employee does not report to work as scheduled. It also creates an unnecessary burden on fellow employees. Therefore, we cannot tolerate absenteeism or tardiness.

Conflict of Interest: It is our policy to forbid employees to deal in any other business which competes with our Company. If you think that there is a possibility that you may have a conflict in this regard, it is your responsibility to notify your supervisor.

Courtesy: Courtesy is the responsibility of every employee. Everyone is expected to be courteous, polite, and friendly both to our customers and to their fellow employees. No one should be disrespectful to a customer, use profanity, or engage in any activity which injures the image or reputation of our Company.

Damage to Property: We have made a tremendous investment in our facilities and equipment in order to better serve our customers and to make your job easier. Deliberate or careless damage to the Company's property will not be tolerated.

Fighting, Threats, and Weapons: Obviously, we cannot allow fighting or threatening words or conduct or any intent to use weapons in a harmful manner.

Fraud, Dishonesty, and False Statements: Falsification of any application, medical history record, invoice, paperwork, time record, or any other document is strictly prohibited. If you observe any such violations, please report them to your supervisor or the Area Manager immediately.

Gifts and Gratuities: Employees may not request or accept any gift or gratuity of any kind from a customer or supplier, without the express authorization of the Area Manager.

Harassment: This Company strictly prohibits all forms of harassment. Please review the No Harassment Policy of this Handbook.

Insubordination: We expect every employee to follow the instructions of supervisors and other management officials. Failure to do so constitutes insubordination.

Misuse of Property: Our policy prohibits the misuse or use without authorization of the equipment, vehicles, or other property of customers, vendors, other employees, or the Company.

Poor Performance: Every employee is expected to make every effort to learn his or her job and to perform that

job at a satisfactory level. Any employee who fails to maintain a satisfactory level of performance is subject to termination.

Safety: We are committed to providing a safe place for you to work, and we have established a safety program to ensure that everyone understands the importance of safety. This program requires each of us to exercise good judgment and common sense in our day-to-day work. Horseplay and practical jokes can cause accidents and injuries and therefore will not be tolerated.

Sleeping and Inattention: We expect every employee to be fully alert while on the job to ensure the safety of all employees and to properly serve our customers. Therefore, we cannot tolerate sleeping or inattention on the job.

Solicitation/Distribution: Solicitation by an employee of another employee during the working time of either employee for any reason is strictly prohibited. Distribution of advertising materials, handbills, or other literature is prohibited in all working areas at all times. Solicitation and distribution by non-employees are prohibited on Company premises at all times.

Substance Abuse: Substance abuse is not tolerated at this Company. Our Drug and Alcohol Policy, which is set forth in detail in the Handbook, explains our position and policy regarding alcohol and drug use as well as the use of other intoxicants and mind-altering substances.

Theft: We do not tolerate theft in any form. In order to protect you, your co-workers, our customers and the Company, we reserve the right to inspect all lockers, desks, tool boxes, purses, briefcases,

packages, vehicles, and any other personal property which is brought onto Company property. If you wish to remove any Company property from the premises, you must obtain written permission in advance from your supervisor.

Unlawful Activity: No employee may engage in any unlawful activity either on or off the job as this can adversely affect the Company's reputation.

Violation of any of these rules may lead to discipline, up to and including immediate termination. Obviously, this list is not all inclusive and there may be other circumstances for which employees may be disciplined, up to and including immediate termination. If you have any questions about these basics, or what we expect of you as one of our employees, please discuss them with your supervisor.

Performance evaluations will become part of the employee's personnel file. The employee can request a copy of the evaluation at the time in which it is administered. A poor work performance evaluation is considered a written reprimand.

IF YOU HAVE A PROBLEM

Our "Problem Solving Procedure" offers all employees the freedom to discuss anything they wish with their supervisors. Whenever you have a problem, it can usually be resolved by following these steps:

1. Any concern should first be discussed with your immediate supervisor. Very often, your supervisor is in the best position to handle your problem satisfactorily.
2. If your supervisor cannot solve the problem or if you are not satisfied after Step 1, you should request to speak to your Area Manager.

3. If you still feel the need to speak to other members of management after you have spoken with your supervisor and Area Manager, we encourage you to speak to the Director of Human Resources.

In the event you have a concern, and for professional reasons cannot follow the steps in this procedure, you may request to go directly to the Area Manager. The Area Manager is available for advice and assistance in solving your problem at any time. When you inform us of a concern or problem, we will try to answer you as soon as possible with regard to the circumstances.

WORKPLACE CONFLICT POLICY

The Organization recognizes that employees may disagree on occasion about how to accomplish assignments, job tasks, or the services provided to our customers. We may also disagree with personal philosophies and values. Such disagreements are to be expected, particularly with a diverse workforce. However, it is necessary that, regardless of what we disagree about, we always treat each other and our customers with respect and courtesy. This is expected of every employee at all times and failure to meet this requirement will result in discipline. Where possible, it is important for employees to work together to resolve such disagreements.

The Organization also understands that some disagreements may require assistance for the employees to reach an appropriate resolution. If a dispute cannot be cooperatively resolved between employees, management requests that the employees bring the matter to the attention of the employees' immediate supervisor.

The supervisor will receive information from the employees involved and is provided with the authority to attempt to resolve the matter, if possible. If not, the supervisor will notify the human resources department to determine what other actions should be taken.

Please understand that the Organization cannot help to resolve disputes that are not reported. Please also be aware that any dispute resolution process does not allow a subordinate employee to ignore the appropriate direction of his or her supervisor.

SAMENESS VS. CONSISTENCY POLICY

The Organization strives to ensure fair treatment of all employees. It is the best interest of our organization to ensure that disciplinary and corrective actions are prompt, consistent and impartial and most importantly, correct the problem, prevent recurrence and prepare the employee for satisfactory service in the future.

It is important that employees realize that the same infraction committed by different employees holding different positions may, at times, result in different corrective action procedures. It is the responsibility of our managers and human resources to review the totality of events, including the tenure, performance record, and previous unrelated infractions of the individuals(s) involved to ensure that the corrective action or termination decision is reasonable and appropriate for the offense.

Here's an example of why the same corrective action for the same infraction is not appropriate. Consider three employees that each fall asleep while they are on duty. One is a Fiscal Assistant, the second is the Receptionist, and the third is an employee that is responsible for regularly operating a motor vehicle. When the Fiscal Assistant is caught sleeping on the job, a verbal warning may be appropriate. When the Receptionist falls asleep at the front desk, a final written warning may be issued instead because of the role's public nature. But falling asleep while operating the Organization vehicle would result in immediate termination, without warning, for the third employee because of the obvious safety concerns. The circumstances surrounding the infraction determine the appropriate level of discipline

more than the infraction itself. The goal is to administer corrective actions in a manner that best serves our Organization and results in satisfactory performance.

PROGRESSIVE DISCIPLINE AND COUNSELING

The Company has established specific rules pertaining to employee safety, conduct and performance. The Purpose of these rules is to (i) promote and ensure appropriate workplace conduct and performance, and (ii) facilitate the fair and consistent treatment of all employees.

This policy applies to all employees, and all consultants, customers, vendors, and visitors of C.W Roberts Contracting, Inc. It is the responsibility of each department manager or supervisor to administer this policy fairly and consistently throughout the organization. Subject to the terms and conditions of collective bargaining agreements and local past practices, this policy may also be used to establish the discipline guidelines for union employees at organized facilities.

Questions regarding the policy or application of this policy should be addressed to the Director of Human Resources. Exception to this policy may only be made by a Division President or their designee.

POLICY

The Company generally follows a practice of progressive discipline in which repeated employee offenses are addressed by increasingly severe disciplinary measures. Some offenses could result in immediate termination, depending on their nature and impact. Managers should apply the concept of progressive discipline, up to and including termination, to employees when improper behavior occurs or persists.

Before initiating any disciplinary action, a manager should (i) gather all the facts surrounding the incident, A. check the employee's personnel file to determine if previous, similar violations have occurred, and (iii) determine the proper level of disciplinary action.

All disciplinary matters are to be handled in a professional and confidential manner. The discipline should not be discussed with other employees, in or out of the department, unless a legitimate "need to know" exists.

All steps of the progressive discipline process should be documented on a Corrective Action Form, with a copy given to the employee and a copy placed in the employee's personnel file. When following the progressive disciplinary process, the supervisor should determine the next level of discipline based on documentation within the past 12 months. A 12-month limit exists on past discipline.

PROGRESSIVE DISCIPLINE STEPS

The process of progressive discipline is not intended as a punishment for an employee, but to assist the employee in overcoming performance problems and satisfy job expectations. Failing that, progressive discipline enables the company to fairly, and with supporting documentation, terminate employees who are ineffective and unwilling to improve.

It is important to note that a manager has the right to bypass the progressive disciplinary steps and base disciplinary action on the severity, frequency, or combination of employee infractions, if warranted by the circumstances.

First Step – Verbal Counseling:

Most first offenses, except those of a serious nature, should be handled with verbal counseling. Verbal counseling may be done informally, with the supervisor meeting with the employee to be certain that the employee realizes that his or her behavior or work performance is unsatisfactory and understands what is expected in terms of improvement. Verbal counseling should include a clear explanation of the consequences of the employee’s failure to correct the problem. This counseling, even if handled informally, should be documented on the Corrective Action Form with a copy given to the employee and a copy placed in the employee’s personnel file.

Second Step – Written Warning:

A written warning should be issued when there is a serious violation or a repeated violation that has not been resolved through verbal counseling. Written warnings should be documented on the Corrective Action Form with a copy given to the employee and a copy placed in the employee’s personnel file.

Third Step – Suspension:

Suspensions are issued when it is determined that repeated employee misconduct has occurred or when an initial incident is too severe for a warning. Suspensions are always without pay and will normally be for three days. Whenever possible, managers should discuss the employee’s conduct with the Human Resources Department prior to the suspension. If a suspension is given, it will begin no later than the next work shift after the Corrective Action Form is given to the employee. Employees will be told specifically when they are to report back to work. A copy of the Corrective Action Form is also to be placed in the employee’s personnel file.

Fourth Step – Discharge:

Employment with C.W. Roberts Contracting, Inc. will be terminated after other disciplinary measures have failed to correct the employee’s workplace/performance problem, or when a first-time incident occurs that a manager considers sufficiently serious. An employee may be discharged at any time without regard to any progressive steps if he or she commits an offense for which immediate discharge is specified as a penalty. Employees who have been terminated for cause are not eligible for rehire. Termination decisions should be fully discussed with the Human Resources Department prior to the termination being announced and executed.

UNACCEPTABLE CONDUCT

Incorporated into this policy are attached lists of C.W. Roberts Contracting, Inc. Performance Rules, Safety, and Conduct, along with suggested progressive discipline and counseling steps. These lists are intended to be used as guidance and are not all-inclusive. However, they should cover most situations that will arise in the workplace.

The following legend applies to the suggested steps:

VC	Verbal Counseling
WW	Written Warning
3S	3-day Suspension
D	Discharge

LIMITATIONS

The company reserves the right to modify or discontinue this policy at any time without notice. This policy will be reviewed on a regular basis to determine its effectiveness. This policy replaces all similar policies previously administered by any division of the company.

EMPLOYEE PERFORMANCE RULES		PROGRESSIVE DISCIPLINE STEPS			
		1st	2nd	3rd	4th
1	Failure to do assigned work or to follow instructions.	VC	WW	3S	D
2	Failure to put forth a reasonable effort (e.g. not meeting standards of quantity).	VC	WW	3S	D
3	Failure to perform work consistent with standards called for by the assignment, position, or trade (e.g. not meeting standards of quality or carelessness).	VC	WW	3S	D
4	Refusal to accept work assignments or the direction from a supervisor; insubordination.	D			
5	Habitual absenteeism or lateness (management may establish Local Attendance Policy).	VC	WW	3S	D
6	Unauthorized or unexplained absence (management may establish Local Attendance Policy).	WW	3S	D	
7	Absent without prior approval for 2 consecutive days (e.g. no call/no show).	D			
8	Sleeping on company time (note: aggravated circumstances such as hiding hazardous area and/or "made bed" situation may warrant dismissal for 1 st offense).	3S	D		

EMPLOYEE SAFETY RULES		PROGRESSIVE DISCIPLINE STEPS			
		1st	2nd	3rd	4th
1	Failure to attend required safety and health training.	WW	3S	D	
2	Failure to observe safe work procedures posted or established at the work place, or contained in the Employee Handbook.	WW	3S	D	
3	Refusal to comply with established and/or required safety rules or procedures. Refusal to comply with verbal safety instructions.	D			
4	Failure to perform according to the Safety and Health Program.	3S	D		
5	Failure to wear/use required safety clothing and personal protective equipment (hard hats, goggles, safety glasses, safety shoes, etc.).	VC	WW	3S	D
6	Failure to utilize fall protection equipment.	3S	D		
7	Failure to perform required pre-operation inspection of equipment/plant.	WW	3S	D	
8	Failure to take action on or report known unsafe conditions, equipment, or employee (e.g. an employee "under the influence" must be brought to the supervisor's attention).	VC	WW	3S	D
9	Unsafe operation of stationary equipment or tools (e.g. shortcutting, misapplication).	WW	3S	D	
10	Unsafe operation of company vehicle or mobile equipment (e.g. speeding, racing, reckless driving, no seat belt on open or heavy equipment, etc.).	WW	3S	D	
11	Failure on the part of a supervisor to take prompt corrective action regarding a reported/discovered unsafe working condition or unsafe equipment.	3S	D		
12	Failure to wear installed seat belts.	VC	WW	3S	D
13	Failure to replace guards, barriers, and other protective devices.	3S	D		
14	Use of any equipment without prior approval for which the employee is not qualified.	WW	3S	D	
15	Allowing unauthorized persons to ride in, on, or operate equipment.	VC	WW	3S	D
16	Non-compliance with "Lock-Out" Procedures:				
A	Failure to follow all prescribed LO/TO procedures, including but not limited to energy isolation and the placing of a lock and tag on equipment	3S	D		
B	Failure to De-energize equipment prior to maintenance.	3S	D		
C	Failure to remove LO/TO lock and tag from equipment.	VC	WW	3S	D
D	Removal of someone else's LO/TO lock and tag without approval.	D			
17	Contributing to unsanitary condition/poor housekeeping or failure to perform requested good housekeeping of clean-up.	VC	WW	3S	D
18	Failure to notify supervisor of any known work-related injury or illness before leaving the premises or worksite.	WW	3S	D	
19	Failure to notify supervisor before obtaining medical assistance for any known work-related injury/illness (review state requirements).	WW	3S	D	
20	Failure to report an accident involving a Company vehicle or property (any employee involved in an accident must submit a written report complete in every detail to his/her supervisor).	3S	D		
21	Falsifying information relative to the investigation of an accident or injury.	3S	D		
22	Unauthorized entry into designated "Permit Required" confined space.	3S	D		

EMPLOYEE CONDUCT RULES		PROGRESSIVE DISCIPLINE STEPS			
		1st	2nd	3rd	4th
1	Distribution, posting, defacing, destroying or removal of notices or signs of printed matter in any form without prior approval.	WW	3S	D	
2	Failure to be in place, ready to begin work at the start of a shift. Leaving early for or returning late from lunch or break.	VC	WW	3S	D
3	Leaving work before the end of shift without prior approval.	VC	WW	3S	D
4	Abuse, damage, destruction or misuse of company property, tools, equipment or the property of others in any manner.	WW	3S	D	
5	Performing (or assisting other personnel in performing) personal work at any time or the use of company time or property for personal reasons without prior approval.	WW	3S	D	
6	Use of cameras, radios, cell phones, or other similar items on company property or worksite without prior approval. Management may establish local work rules for the use of non-work-related items.	VC	WW	3S	D
7	Abusive, coercing, intimidating, harassing, or threatening language or behavior in the workplace. Other violations of the C.W. Roberts' non-discrimination or harassment in the workplace policies.	3S	D		
8	Fighting on Company time or premises.	3S	D		
9	Personal or misuse of company computers or email.	VC	WW	3S	D
10	Removing company equipment or materials from company premises or other assigned places by fraudulent order or misrepresentation.	D			
11	Possession, sale, use or reporting under the influence of alcoholic beverages or illegal drugs while on Company time or premises.	D			
12	Smoking in restricted or prohibited areas.	3S	D		
13	Refusing to take a drug or alcohol test.	D			
14	Gambling on company premises.	WW	3S	D	
15	Participation in a work stoppage, slow-down, sit-down or walk-out (leadership of such activities warrants discharge).	3S	D		
16	Theft of company property or the property of any personnel. Removal of any property from the plant, lockers, office, etc., without prior approval will be considered theft regardless of value.	D			
17	Falsification of any company record or document.	D			
18	Unauthorized possessions or use of explosives, firearms, or other weapons.	D			
19	Leaving the premises, work area, department, or visiting another department without permission of a supervisor.	VC	WW	3S	D
20	Any act of sabotage.	D			
21	Coercing, enticing, bribing or otherwise inducing employees to engage in any practice in violation of company rules or policy.	VC	WW	3S	D
22	Provide false information or obstruct a company investigation.	3S	D		
23	Failure in not taking action on or to report known violations of Company Work Rules and/or policies to supervisor.	WW	3S	D	
24	Loafing or loitering on company premises before or after work hours.	WW	3S	D	

ETHICAL COMMUNICATIONS POLICY

All C.W. Roberts Contracting, Inc. employees must abide by a code of wholly ethical communications with peers, supervisors, employees, vendors, and membership. Ethical communication enhances human worth and dignity by fostering truthfulness, fairness, responsibility, personal integrity, and respect for self and for others. As such, the following rules should be expressly followed to avoid violating such code:

- A. Communicate any and all concerns regarding another's behavior directly with the individual. Sharing such concerns with others that do not have a legitimate reason to know such concerns may quickly amount to gossip – one of the most damaging practices in any workplace.
- B. Avoid argumentative tones and comments. Employees should state their position clearly and factually in a normal tone, allowing the other individual an opportunity to share his or her position, and inviting open discussion regarding both such positions.
- C. Honesty is always the best procedure. It is critical that employees never engage in deceit, exaggeration, or express dishonesty when dealing with other individuals. While some communication may be extremely difficult to have, employees are always expected to provide them in a candid, but respectful manner.
- D. Respect issues of confidentiality. Employees of C.W. Roberts Contracting, Inc. will be faced with topics of great confidentiality at times and, as such, must avoid sharing any such information with anyone not intended to be part of such confidentiality. This procedure speaks only to issues of confidentiality related exclusively to C.W. Roberts Contracting, Inc.'s purpose and mission and should not be interpreted to include gossip, personal information, and other topics not related to C.W. Roberts Contracting, Inc. itself.

Any employee found violating any portion of the procedure may be subject to disciplinary action, up to and including termination.

CONFIDENTIAL INFORMATION AND PRIVACY

Employees may, by virtue of their employment with the Organization, obtain access to sensitive, confidential, restricted and proprietary information about the Organization, its customers and clients, and its employees. Such information is not generally known or made available to the public or others and which the Organization has made reasonable efforts to keep confidential. This includes but is not limited to financial records, employee and customer records, telephone numbers, email addresses, files, referral or mailing lists, credit card numbers and similar information, whether in paper form, in computers or otherwise.

Such confidential information shall be used solely by employees in the performance of their job duties for the Organization and shall not be used in any other manner during their employment. Employees shall not without the prior written consent of the Organization use, disclose, divulge, or publish to others any such confidential information acquired in the course of their employment. Such confidential information is the exclusive property of the Organization and under no circumstances whatsoever shall employees have any rights to use, disclose or publish to others such confidential information after the termination of their employment.

Unauthorized use or disclosure of confidential information may result in discipline, up to and including immediate discharge, prosecution, or other available action.

Upon termination of employment, employees must deliver to the Organization any and all confidential information whether stored electronically or as a document, including but not limited to all copies of such documents prepared or produced in connection with their employment with the Organization that pertain to the Organization's business or the employee's services for the Organization, whether made or compiled by the employee or furnished to the employee in connection with such services to the Organization. In addition, at termination, employees must return to the Organization all of the Organization's non- confidential property, documents, or electronic information.

This policy does not limit the common law and statutory rights of the Organization.

USE OF EMPLOYEE PHOTO, LIKENESS, AND VOICE POLICY

The Company may take pictures or make recordings of its activities, including specific work tasks or company events to be used in educational, recruiting, or promotional materials that capture your name, likeness, voice, and/or appearance. Such materials may be in various forms of media, including, but not limited to, illustrations, bulletins, exhibitions, videotapes, reprints, reproductions, publications, advertisements, and promotional or educational materials in any medium now known or later developed, including the internet. The Company has complete ownership of such depictions, including the entire copyright, and may use them for any purpose consistent with the Company's activities or missions. You will receive no compensation for the use of such depictions and release the Company, its agents and assigns from any and all claims arising out of or in any way connected to such use. Your consent to such use is a condition of your employment with the Company, and such consent will survive any termination of your employment until you revoke such consent in writing.

RESPONSIBILITY FOR ACCURATE AND TRUTHFUL INFORMATION

Employees of the Organization are responsible for providing accurate and truthful information to the Organization in all aspects of the employment relationship. This obligation begins with an employee's application and all information submitted to the Organization prior to hire and is a continuing obligation through an employee's tenure with the Organization. This includes, but is not limited to, all information an employee submits regarding his or her internal administrative and benefit-related documentation, all records of time worked, all input regarding any form of performance evaluation or corrective action plan, and as related to an employee's performance of his or her job duties. Any violation of this obligation on the part of the employee will result in discipline upon discovery of false information, with the likelihood such actions will lead to termination of employment.

INFORMATION SECURITY POLICY

Computer information systems and networks are an integral part of business at C.W. Roberts Contracting, Inc. There have been substantial investments in humans and financial resources to create these systems. These policies and directives have been established in order to protect this investment, safeguard the information contained within these systems, reduce business and legal risk and protect the good name of the company.

The Organization reserves the right to limit or prohibit employee use of electronic communications when necessary to ensure organizational production or to discipline employees for performance related reasons.

The Organization may monitor employee use of computers and email for any and all legitimate management purposes. Such purposes include the assurance of employee production, the prevention of

illegal harassment and other unethical behaviors, and all other necessary reasons to best ensure that the mission of the Organization is met. Employees should not expect any privacy when using Organization computers or email.

Violations may result in disciplinary action in accordance with company policy. Failure to observe these guidelines may result in disciplinary action by the company depending upon the type and severity of the violation, whether or not it causes any liability or loss to the company, and/or the presence of any repeated violation(s).

Internet Policy:

Access to the internet is provided to certain employees for the benefit of the company and its customers. While the Internet provides access to a wealth of valuable information and facilitates communication, it also opens the potential for others to gain unauthorized access to the company's valuable proprietary information. Internet access and e-mail are valuable and costly corporate resources that must be used only for company business. Irresponsible use reduces their availability for critical business operations, compromises corporate security and network integrity, and leaves the company open to potentially damaging litigation. To ensure all employees understand their responsibilities, the following guidelines have been established for using company e-mail and the Internet. Any improper use of the Internet or e-mail jeopardizes the company's legal standing and will not be tolerated. This policy also covers all activities performed while using the Internet, including but not limited to, browsing (viewing Web pages), using e-mail, instant messaging, blogging (using Web logs), and transferring files using file transfer protocol (FTP).

Remember that while on the Internet, everything you see on your monitor, except for streaming media, is stored to your hard drive.

Acceptable Use:

The company provides Internet and e-mail access for business use. Every employee has the responsibility to maintain and enhance the company's public image and to use company e-mail and access to the Internet in a manner that reflects well on the company. The company recognizes there will be occasional personal use on lunch breaks and during non-working hours, but this use shall not be excessive or unreasonable.

Unacceptable Use:

Company e-mail and Internet access may not be used for transmitting, retrieving, or storing any communications of a discriminatory or harassing nature or materials that are obscene or "X-rated". Harassment of any nature is prohibited. No messages with derogatory or inflammatory remarks about an individual's race, age, disability, religion, national origin, physical attributes, or sexual preference shall be transmitted. No excessively abusive, profane, or offensive network language is to be transmitted through the company's e-mail or Internet system. Electronic media may not be used for any purpose that is illegal, against company policy, or contrary to the company's best interests. Solicitation of non-company business or any use of the company e-mail purposes is prohibited. The use of company IT equipment for downloading and/or storing music files, music video files, "movie" files, Internet radio, and other such entertainment is prohibited, regardless of the source.

Communications:

Each employee is responsible for the content of all text, audio, or images that he/she places or sends over the company's e-mail and Internet system.

Copyright Issues:

Employees may not transmit copyrighted materials belonging to entities other than the company on the company's e-mail and Internet system. This includes the sharing and downloading of copyrighted music and or music download software, i.e., iTunes, Napster, Kazaa, LimeWire, Morpheus, etc. Failure to adhere to this policy puts the company in serious legal jeopardy, opening up the company to significant lawsuits and public embarrassment. Failure to observe copyright or license agreements may result in disciplinary action by the company and/or legal action by the copyright owner.

USE OF ARTIFICIAL INTELLIGENCE (AI)

All employees have access to AI. Employees seeking to use such systems must ensure that the use does not violate any policies related to the Organization's confidentiality or equipment usage. Employees using AI for any reason associated with their employment will also be solely responsible for the content generated. Any content that violates any existing conduct or other policies, or that indicates use of copyrighted or other protected material will result in discipline up to and including termination.

Any employee seeking to use AI for job purposes is first required to secure written approval from such employee's supervisor. The Organization encourages employees to pursue greater points of efficiency available as a result of AI but also demands integrity in how such tool is utilized to further employees' work product.

The purpose of this policy is to ensure that all employees use AI tools in a secure, responsible and confidential manner. The policy outlines the requirements that employees must follow when using AI tools, including the evaluation of security risks and the protection of confidential data.

We recognize that the use of AI tools can pose risks to our operations and customers. Therefore, we are committed to protecting the confidentiality, integrity, and availability of all company and customer data. This policy requires all employees to use AI tools in a manner consistent with our security best practices, as follows.

1. **Evaluation of AI tools.** Employees must evaluate the security of any AI tool before using it. This includes reviewing the tool's security features, terms of service, and privacy policy. Employees must also check the reputation of the tool developer and any third-party services used by the tool.
2. **Protection of confidential data.** Employees must not upload or share any data that is confidential, proprietary, or protected by regulation. This includes data related to customers, employees, or partners.
3. **Access control.** Employees must not give access to AI tools outside the company. This includes sharing login credentials or other sensitive information with third parties.
4. **Use of reputable AI tools.** Employees should use only reputable AI tools and be cautious when using tools developed by individuals or companies without established reputations. Any AI tool used by employees must meet our security and data protection standards. Your supervisor or a member of our IT Department can guide you regarding these standards.

5. **Compliance with security policies.** Employees must apply the same security best practices we use for all company and customer data. This includes using strong passwords, keeping software up-to-date, and following our data retention and disposal policies.

The Organization does business with governmental entities and therefore is subject to specific requirements regarding AI. We must:

- Maintain records of all resume searches conducted using AI, both from searches of external websites and internal resume databases, which include the substantive search criteria used; and
- Provide information on all AI systems used in the recruiting, selection and hiring process to the Department of Labor upon request.
- Provide advance notice and appropriate disclosure to applicants and employees being considered for promotion or transfer of our intent to use AI in the hiring process, including what data will be captured and used by the AI system.
- Provide advance notice to applicants and employees being considered for promotion or transfer of their right to review, correct or delete erroneous data gathered using AI.
- Safeguard the privacy of applicants and employees when using AI.
- Ensure transparency regarding the basis of an employment decision and how AI contributed to the decision.

Because of the above requirements, all such use of AI in the posting, screening, interviewing, selection, compensation or in any other way related to the hiring process must be conducted solely by the authorized staff in our Human Resources Department.

ELECTRONIC RECORDS RETENTION PRACTICES

The company maintains all electronic communications, including both electronic mail and instant messaging correspondence when it reasonably knows that the data is relevant to pending, imminent, or reasonably foreseeable litigation. The litigation hold is to remain in full compliance with the Federal Rules of Civil Procedure. The Company's human resources and leadership teams are instructed to contact the technology department immediately upon identifying a situation that is reasonably calculated to lead to litigation. Such situations include terminations, allegations of harassment or discrimination, and conflict among employees. The Company's technology department will then selectively preserve all electronic stored information (ESI) sent to and from the employees involved in the matter for a period of seven years.

SOCIAL MEDIA

We recognize that employees will use social media and other online communication tools as a growing way to connect with others. As an initial point, the same principles and guidelines that apply to your activities as an employee in general, as found throughout the Handbook and your job description, apply to your activities online. This includes any form of electronic communication, such as online publishing and discussion, including blogs, wikis, file-sharing, user-generated video and audio, virtual worlds, and social networks whether or not associated or affiliated with our organization. The Organization trusts and expects

employees to exercise personal responsibility whenever they participate in social media. This includes not violating the trust of those with whom they are engaging. We expect that employees utilizing social media will recognize and follow the guidelines included within this policy. You are solely responsible for what you post online. Any of your conduct that adversely affects members, customers, clients, suppliers, employees or our business interests will result in disciplinary action, up to and including termination.

Please abide by the following expectations:

- (1) You may not comment for or speak on behalf of the Organization without prior written approval.
- (2) You may not make negative or disparaging remarks about other employees.
- (3) Always consider the power of your comments and contemplate the impact of your post on your reputation and that of the Organization before you publish it.
- (4) Respect all confidential and proprietary information that you possess because of your relationship with the Organization. Secure written permission to publish or report on conversations that are meant to be private or internal to the Organization.
Examples of confidential information include, but are not limited to, client/customer information, confidential academic information, proprietary data, development of systems, products, processes and/or technology, internal policies and memorandums, and all proposed and executed organizational strategies. Do not post internal reports, policies, procedures or other internal business-related communications.
- (5) You may not use the Organization's logo, trademark, or graphics on personal sites without prior written approval.
- (6) When disagreeing with other opinions, be appropriate and professional in doing so when posting such disagreement on social media sites.
- (7) When posting about your work at the Organization use your real name, identify that you work for the Organization and the position that you hold. Be aware of your association with the Organization in online social networks. If you identify yourself as an employee of the Organization, ensure your profile and related content is consistent with how you wish to present yourself with colleagues and clients.
- (8) Anytime you publish content on an external website regarding anything to do with work you do, or any subjects associated with the Organization, use the following disclaimer: "The postings on this site are my own and don't necessarily represent the Organization's positions, strategies or opinions."
- (9) Respect financial disclosure laws. It is illegal to communicate or give a "tip" on inside information to others so that they may buy or sell stocks or securities.
- (10) Respect your audience. Don't use slurs, personal insults, obscenity, or engage in any conduct that would not be acceptable in our workplace. You should also show proper consideration for others' privacy and for topics that may be considered objectionable or inflammatory.
- (11) Employees are prohibited from posting any type of photograph of any Organization employee, client/customer, parent, family member, or volunteer on any and all social networking sites without express written approval.

(12) Do not create a link from your personal blog, website or other social posting to an Organization website.

(13) The Organization respects its employees' interest and willingness to convey group complaints regarding existing working conditions. While it wholly respects employees' right to discuss such concerns utilizing social media, it encourages any such concerns to be brought to the Organization's administration.

(14) Refrain from using social media while on work time or on equipment we provide, unless it is work related and authorized by your manager and consistent with our equipment policy.

(15) Do not use your organizational email address to register on social networks, blogs or other online tools utilized for personal use.

(16) Vulgar, obscene, threatening, intimidating, harassing, discriminatory, or unlawful behaviors on social media sites may result in an employee's immediate termination.

EQUIPMENT AND PROPERTY ASSIGNED TO YOU

We have made a tremendous investment in our facilities and equipment in order to better serve our clients and to make your job easier. Equipment such as laptop, cell phone, PowerPoint projectors, MIFI, etc., may be assigned to you to facilitate our service to our clients. Except for the property/equipment specifically assigned to you for such purposes, no other property or equipment may be removed from the premises without the express permission of the Executive Director.

Your computer may be the most valuable item assigned to you. As well as being expensive to replace physically, your computer may contain valuable and sensitive data. You may not use the equipment assigned to you to conduct work for yourself or another entity. Equipment assigned to you is subject to monitoring. You should have no expectation of privacy with respect to the use of such equipment. Additionally, you may be asked to surrender the equipment with no notice for a variety of reasons including routine maintenance.

Requirements for safeguarding the equipment assigned to you include protecting it from theft. Always remove equipment from a vehicle when the vehicle is parked in a public location such as a restaurant or hotel. Never leave equipment in a vehicle overnight.

Do not remove any inventory or property marking tags. Do not remove or disable any protective software.

Additional safeguards include:

- Use strong passwords to protect the information stored on your computer.
- Use an uninterruptible power supply, when possible, so that blackouts, brown-outs and electricity spikes don't harm your equipment.
- Do not place liquids, magnets or hot items near your equipment.

If equipment assigned to you is in need of repair, report it to your supervisor immediately. You are responsible for the safekeeping of any organization-owned equipment or property that is in your possession. Careless disregard for proper care and safekeeping could subject you to disciplinary action.

CELL PHONE OR SIMILAR DEVICE USED FOR BUSINESS POLICY

This policy about cellular phone usage applies to any device that makes or receives phone calls, leaves messages, sends text messages, surfs the internet, or downloads and allows for the reading of and responding to email whether the device is company-supplied or personally owned.

To promote safety and effectiveness of work, employees are asked to leave cell phones in their car during their shift unless the nature of the employee's job requires accessibility by phone. Cell phones may be used to make personal calls during breaks and meal periods only. In the unusual occasion of an emergency or anticipated emergency, a cell phone may be carried to the workplace on vibrate mode with supervisor's approval.

Under Florida Law, texting while driving is a primary offense (including messaging, emailing and other forms of typing on a mobile device). The Company strongly recommends the use of hands-free devices when receiving or placing calls as one way to minimize the risk of accidents.

An employee who uses a company-supplied device or a company-supplied vehicle is prohibited from using any handheld device to text message, surf the internet, receive or respond to email, or check for phone messages while driving, whether the business conducted is personal or company-related.

The Company has zero tolerance for violation of this policy. Employees who violate this policy will be subject to disciplinary action, up to and including termination.

E-MAIL CURFEW POLICY

It is the policy of our organization that non-exempt employees will work only their assigned schedule unless they are provided with specific, prior approval for a schedule change or overtime. Reading, sending, or otherwise working on emails off work constitutes work and is strictly prohibited without such prior approval. Employees violating this policy are subject to discipline, up to an including termination.

OUR LOGO, TRADEMARK AND BRAND

This policy governs the use of all Organization's trademarks for any purpose and applies to all employees. Consistency in the use of our brand strengthens our value and our ability to be instantly recognized by our clients and other stakeholders. Our logo may only be used in strict accordance with this policy and the graphics requirements of the approved brand. Our logo may not be altered or combined with any other mark or element. Our logo must appear prominently on all official communication and marketing materials such as brochures, letterhead and business cards.

Any use of our logo, trademark or brand in print and electronic materials including email and social media must conform to our brand requirements. Our logo may not be used on commercial merchandise except as expressly approved by the CEO/Executive Director/President.

Our logo may not be used in any way that states or implies endorsement of a commercial product or service, gives a false impression, is misleading, or could cause confusion regarding our Organization's relationship with any person or entity.

Neither our name nor our logo may be used in any manner that could adversely affect our image or standing in the community. Such proscribed uses include, but are not limited to, the use of our logo in connection with alcoholic beverages, cigarettes or other tobacco products, sexually oriented products or services, religious products, political parties or organizations, gaming or games of chance, and firearms.

We expect our employees to respect all copyright and other intellectual property laws—for the protection of our Organization as well as the employees. Proper respect for the laws governing copyright, fair use of copyrighted material owned by others, trademarks and other intellectual property, including our own logo, copyrights, trademarks and brands is critical to continued employment.

COMPANY PROPERTY AND VEHICLES POLICY

Only authorized employees may use Company vehicles. If a Company vehicle incurs any damage while under the charge of a particular employee, that employee will be responsible for reporting the damage immediately and may be responsible for paying the deductible amount toward repair.

Any employee whose duties include the operation of Company vehicles who is cited for D.U.I. or D.W.I or for any other serious moving violation will be considered to have an unacceptable driving record and his or her continued employment will be subject to review.

If an employee receives a traffic citation while operating a Company vehicle, the employee will be responsible for paying any fine or penalty.

SAFETY POLICY

It is our policy to promote safety on the job. The health and well-being of our employees is foremost among our concerns. For this reason, you are urged to follow common sense safety practices and correct or report any unsafe condition, defective tool, or equipment to your supervisor.

Each employee is expected to assist the Company in maintaining safe working conditions. Safety is a state of mind and requires constant vigilance and common sense. Safety is everyone's responsibility. Remember: SAFETY FIRST! All accidents -- including those which do not involve serious injury and those involving customers -- must be reported immediately to your supervisor.

For any specific questions or additional concerns, please refer to our extensive C.W. Roberts Contracting, Inc. Safety Manual which can be obtained from the Safety Director.

GENERAL SAFETY RULES

1. Job safety is the responsibility of each individual employee. Job safety is often applying common sense to a situation. Use good common sense and stay alert on the job at all times.
2. All injuries, no matter how slight, must be reported to your supervisor immediately.
3. Submitting false or fraudulent information when reporting an injury is a felony and will be cause for dismissal and denial of medical and wage loss benefits.
4. Employees under the influence of drugs or alcohol on the job will be subjected to immediate discharge. Employees taking prescribed medication should advise their supervisor.
5. If you feel ill or are emotionally upset due to personal problems, discuss your situation with your supervisor before starting or continuing work.

6. Report any unsafe condition to your supervisor immediately, regardless of whether the unsafe condition directly affects you.
7. If at any time you are not sure how to perform the job you have been asked to do, **STOP AND CHECK WITH YOUR SUPERVISOR**. This is for your safety and for the safety of your co-workers.
8. Do not start or operate any equipment without the proper authority and safety instructions. Never operate a piece of equipment when guard or other safety devices are not in place.
9. Do not attempt to repair or tamper with equipment that is not working properly. Report this condition to your supervisor.
10. An employee who is furnished safety equipment (i.e. reflective vest, hardhat, safety glasses, etc.), will be required to use such equipment.
11. Good housekeeping practices should be followed at all times.
12. Use the correct method of lifting objects. Lift with your legs, not your back. If a load is too heavy or awkward, ask for help.
13. Do not use flammable liquids, toxic materials, chemicals, or acid unless authorized and instructed in the proper handling methods.
14. Wear seat belts at all times.
15. Obey all safety and warning signs at all times.
16. Only employees authorized to drive trucks or operate equipment may do so.
17. Dump truck drivers should remain in the cab of the truck throughout the entire loading operation (especially when loading from silos).

WORKPLACE INJURIES

Our Organization strives to provide a workplace that is free from any known health or injury hazards. Employees can assist us by bringing forward any health or safety concerns. Employees may speak with their supervisor or the director of safety about any issues related to safety without fear of reprisal or retaliation. Employees may also receive periodic training on workplace safety and responsible handling of hazardous substances.

If any employee sustains a job-related injury or illness, it must immediately be reported to the supervisor, our safety director, or another member of management. This reporting requirement applies to all injuries, no matter how small or insignificant it may appear initially. The Organization wants to ensure that any injured employee receives prompt and appropriate medical attention.

Additionally, our Organization complies with all federal and state regulatory standards regarding workplace injuries and illnesses. As such, we must make a timely record of any workplace injuries or illnesses. We also are responsible for workers' compensation insurance for employees which provides for medical coverage, disability coverage and loss of work time compensation due to a work-related injury.

Employees may report work-related injuries and illnesses without any concerns of adverse employment action or retaliation by our Organization.

HAZARDOUS AND TOXIC MATERIALS POLICY

If your job requires you use hazardous or toxic materials, you are expected to comply with all federal, state and local laws and regulations concerning their safe handling and disposal. Please be sure to familiarize

yourself with proper handling and safety procedures. If you have any questions, please discuss them with your supervisor.

VIOLATION OF LOCAL, STATE AND / OR FEDERAL LAWS AND SELF- REPORTING OF ARRESTS AND CONVICTIONS POLICY

Anyone known to be violating a local, state, and/or federal law on Organization property or at an Organization-supported function will be subject to referral for prosecution to the appropriate law enforcement agency.

All employees are required to self-report the following information to their immediate supervisor or the Human Resources office within forty-eight (48) hours:

- Any arrests/charges that are considered a felony
- Any conviction, finding of guilt, withholding of adjudication, commitment to a pretrial diversion program, or entering of a plea of guilty or Nolo Contendere for any criminal offense other than a minor traffic violation.

For purposes of this policy, a minor traffic violation is defined as a non-criminal violation that may require community service hours but is not punishable by incarceration and for which there is no right to trial by jury. Criminal traffic violations, including driving under the influence of alcohol and/or drugs, are not minor and must be reported.

Any employee in violation of the reporting requirements of this policy may be subject to disciplinary action up to or including dismissal.

SMOKING POLICY

Our Company complies with the Florida Clean Indoor Air Act (FCIAA) which prohibits smoking, vaping and the use of e-cigarettes in workplaces. As a result, no employee, vendor, customer, or other person may smoke, vape or use e-cigarettes within our indoor working areas. Anyone intending to smoke, vape or use e-cigarettes must utilize the designated outdoor area during approved breaks. All infractions of such policy should be immediately reported to your supervisor. Any employee found violating such policy will be disciplined, up to and including termination.

PERSONAL APPEARANCE POLICY

We do not have a formal dress policy and prefer to rely on every employee's good judgment to dress appropriately for a business such as ours. We do expect all employees to present a neat, clean, and well-groomed appearance always. Body and mouth odors should be addressed by being freshly showered and the use of deodorants and mouth wash before the start of a working day.

Please avoid extremes in dress and behavior. Flashy or revealing clothing, t-shirts, shorts, and other non-business-like clothing are unacceptable. If you wear a Company uniform, please be sure that it is clean and neat, with shirt tails always tucked in.

WORKPLACE POSTING AND APPAREL

Over the past 12 months, the United States Supreme Court has addressed the issue of sexual orientation and identification. And we've seen political and social movements becoming prominent. If an employee

chooses to express their support for different political or social causes, whether through the form of posting messages in the workplace or through clothing, including face masks, CWR will be supportive as possible. However, we will not permit any employee to post or wear messages that are discriminatory or derogatory. Further, messages that become a disruption in the workplace will not be permitted.

SOCIAL EVENTS WITHIN THE WORKPLACE POLICY

Our culture seeks to be inclusive and permits all employees to participate in any and all social gatherings that occur within the workplace. Events such as birthday parties, retirement celebrations, and other like events represent opportunities to fellowship and further develop the culture of the Organization. As such, no employee is allowed to initiate or organize a social gathering or function for their division without inviting all employees to attend. Simultaneously, no employee should ever feel pressured to participate in such an activity and simply needs to express his or her lack of interest in such participation to those organizing such an event.

OPEN OFFICE ENVIRONMENT POLICY

Common courtesy and respect will go a long way in ensuring a productive environment in our workspace. To assist toward the goal of helping each of you be as productive as possible, we are providing the following guidelines:

Minimize hallway conversations

While it can be convenient and productive to have a quick work conversation in the hallway with a coworker, these conversations can be very distracting to other employees working in close proximity. Be mindful of the potential for disruption and step to a convenient conference room or to a general corridor away from other workers to have the conversation.

Limit noises

Keep the sounds coming from your workspace to a minimum. This means using earbuds when listening to music, picking up the phone after one or two rings, tuning the ring volume on your phone to a low setting, and avoiding screensaver sound effects. When away from your workspace, set your office phone to take voice messages and if you leave your cellphone behind when you leave your workspace, set it to vibrate. Be aware of your personal voice volume level. Speak only loud enough to be heard by the intended audience when talking on the telephone or to your coworkers. Those around you may be able to hear you, even when you are not thinking about it.

No confidential meetings

Avoid discussing personal and/or confidential matters at your workspace. Whether you're on the telephone or having a discussion with a coworker, your conversation may easily be overheard by others. Move to a conference room or step outside to discuss personal or confidential matters.

Scents and fragrances in the workplace

Exposure to scents and fragranced products can make it difficult for some employees to function effectively at work. Fragrance sensitivity is either an irritation or an allergic reaction to some chemical or combination of chemicals in a product. Although perfume and cologne are generally what come to mind, fragrance is commonly added to a variety of daily use items like toiletries, cosmetics, air fresheners, laundry soaps and softeners, and cleaning products. People with fragrance sensitivity often experience symptoms such as breathing difficulties: wheezing, a tight feeling in the chest, or worsening of asthma

symptoms; headaches; nausea; hives and other skin irritations; and limitations in memory and concentration.

We request that all employees be aware of how their use of fragrances may impact on their co-workers and refrain from wearing colognes, perfumes, etc. to the workplace and refrain from using scented products in the workplace.

We request that all employees be respectful of coworkers who express sensitivity to food that has a strong smell. In this situation, using a breakroom away from the office area is expected.

If you experience an allergic reaction or have a sensitivity to a workplace scent or fragrance, please notify your supervisor so that the issue may be addressed. Collaboration between all parties should remedy the situation. Accommodation requests will be considered the same as any other disability accommodation.

Decorate with taste

You need to use good judgment when decorating your workspace. Avoid things that are controversial. This includes things that are political, spiritual, sensual, or cultural. Your office décor should be in good taste without offending others.

Respect others' privacy

Be respectful of your coworkers. Avoid peeking into another workspace or listening in on other's conversations. Resist the temptation to chime in on other's conversations or join them uninvited. Give others the same respect that you want.

CHILDREN IN THE WORKPLACE

I. Policy Statement

C.W. Roberts Contracting, Inc. (the "Company") values family life and has worked to develop employment policies and benefits that are supportive of families. While we seek to provide an environment open to work and family issues, the Company cannot allow the continued or reoccurring presence of children (defined as persons below the age of eighteen years old) in the workplace for the following reasons: (1) the potential for interruption of work; (2) health and safety concerns; and (3) potential liability exposure for the Company.

II. Policy Principles

In general, it is not appropriate for children to be in the workplace on a regular basis, including after school or during school holidays. Any child with an infectious disease or an illness that prevents the child from attending school or going to a childcare facility should not be brought to the workplace under any circumstances. If an employee must attend to his or her child and short-term childcare cannot be arranged, the employee should take sick or annual leave, as appropriate per Company policy, to accommodate the child during working hours.

Children may be allowed on the Company's premises under limited, non-recurring circumstances. For example, children are welcome when the purpose of their visit is to participate in activities specifically scheduled and designed for their benefit, such as a Company social function to which families are invited. Additionally, the Company may from time-to-time permit internships, job shadowing or other programs in

which children are specifically invited to participate. Finally, children may be brought to the workplace for brief periods by parent employees for other exceptional times when common sense would dictate that it is more efficient for the employee to bring the child into the workplace (e.g., following or before a physician's appointment if the child is not contagious). In any such instance where children are brought to the workplace, the following rules apply:

- The parent employee must supervise the child on such visits, making sure that the child is always in the parent employee's office and ensuring that they are not disruptive to other employees in the workplace. Children must not be left unattended or with other employees. This includes accompanying children to the bathroom.
- It is the parent employee's responsibility to keep the child safe including making sure the child follows hygiene and other health and safety rules while on site.
- Short term visits to jobsites with children in a company vehicle are not prohibited but the duration of that visit should be de minimis and the children should not leave the vehicle. The vehicle should be parked in a safe location away from the active jobsite and out of the path of equipment and the traveling public. Likewise, visits in a company leased vehicle will follow the same rules. The Company defers to any federal or state laws addressing such.
- Children are not allowed in high-risk areas under any circumstances including, but not limited to, asphalt plants, laboratories, shops, mechanical rooms, garages, or any areas containing power tools or machinery.
- Employee parents are responsible for the child's safety and financially responsible for any damage caused by the child. The Company does not accept liability for injuries to children or visitors on the Company's premises in violation of this policy.
- Employee parents generally should provide advance notification and receive permission from a supervisor, or human resources personnel, before bringing a child onsite. Further, a supervisor may direct the employee to remove the child from the workplace at any time if the supervisor determines that this policy has been violated or that a child's presence negatively impacts Company interests.
- Co-workers have the right to share their opinions about children in their workplace at any time with Management.

The Company may revoke this policy at any time and for any reason. Questions regarding bringing children into the workplace must be directed to the Company's human resources personnel.

RELIGIOUS EXPRESSION AND ACCOMMODATION POLICY

The Organization is dedicated to treating the religious diversity of all our employees equally and with respect.

Religious Communication and Behaviors

It is not a violation of this Policy for employees to discuss religion, or to read or view religious materials, at work during non-working time. However, employees who do so should be sensitive to and respectful of the different beliefs (or lack of belief) of others. When another employee objects to religious advances, such behaviors and efforts must immediately cease. Moreover, religious practices that interfere with job performance, excessive "preaching" that is unwelcome to others, or adverse treatment of others because of

their beliefs, different beliefs, or lack of belief, may be considered “harassment” within the meaning of this and other existing policies.

Religious Accommodations

Employees may request an accommodation when their religious beliefs cause a deviation from the Organization’s dress code, schedule, basic job duties, leave or other aspects of employment. As such, the Organization welcomes any requests for accommodations because of recognized beliefs that do not create an undue hardship on the Organization’s ability to properly fulfill its mission.

The Organization will consider the request but reserves the right to offer its own accommodation to the extent permitted by law. Some, but not all, of the factors that the Organization will consider are cost, the effect that an accommodation will have on current established policies and the burden on operations, including other employees, when determining a reasonable accommodation.

The procedure for reasonable accommodation requests includes:

- Employee advises his or her supervisor and Human Resources of the need for accommodation.
 - The accommodation request will be discussed with the employee and the employee’s supervisor.
 - If a reasonable appropriate accommodation is readily available, the request will be approved and the accommodation implemented.
- If an accommodation is not readily ascertainable, the matter will be pursued further with assistance from appropriate external resources.

At no time will the Organization question the validity of a person’s belief.

Personalization of Work Areas and Holiday Decorations

Employees are generally permitted to engage in private expression, including displays of religious ornamentation, in personal work areas that are not regularly open to the public. However, the Organization reserves the right to restrict workplace décor for legitimate reasons relating to safety, hygiene, or environmental conditions.

In a public workspace, that is, a space to which the public has physical or visual access, only secular decorations, including secular holiday decorations, may be displayed. Religious symbols or decorations with religious content may not be displayed in public workspaces.

PAY TRANSPARENCY POLICY

Our Organization complies with the Pay Transparency requirements for Federal Contractors. As such, our organization will not discharge, discipline, or otherwise discriminate against employees or applicants who inquire about, discuss, or disclose their compensation or the compensation of other employees or applicants. For our organization compensation includes base pay, overtime pay, commissions, bonuses, and company-provided benefits.

Any employee who feels that they have been the victim of discriminating compensation practices is encouraged to bring their concerns to either their immediate supervisor, the Human Resources Department or the President of the Organization so that the concerns may be reviewed and resolved. Likewise, any employee that feels they have been disciplined for seeking information about compensation or discussing

their compensation or the compensation of other employees or applicants of the Organization, should bring their concerns to the Human Resources Department or the President of the Organization.

Employees who work in the Human Resources Department, Payroll Department, Accounting Department, or serve in any other role where compensation information is obtained in the course of performing their assigned job functions are not protected by this regulation and are prohibited from disclosing any compensation information.

EMPLOYMENT REFERENCE PROHIBITION POLICY

Any and all solicitations for reference information should be immediately directed to the human resource office or the office manager of your division. Reference information will include a former employee's position title, dates of employment, and whether such employee is eligible to be rehired. The only time other information is provided is with signed consent.

GIFT REPORTING POLICY

Organization employees are prohibited from soliciting or accepting cash or gratuities of any amount from a person or entity doing business with the Organization. Additionally, unless specifically permitted by this policy, Organization employees are also prohibited from accepting any and all non-cash gifts, including materials, meals, services, travel, entertainment, attendance at a charitable or similar event as a guest at no cost or at unreasonably discounted prices from person or entities proposing to do or actually doing business with the Organization. The only exceptions to this policy are as follows:

- Holiday business gifts of value totaling less than twenty-five dollars (\$25) in any single year that are for the shared departmental use or consumption
- Occasional meals in connection with actual business
- Awards or gifts provided by the Organization in express and open recognition of an employee's contributions.

All unpermitted gifts must be immediately declined, returned or discarded. Employees must report to their supervisors and the human resources professional before the end of each month regarding all gifts received during the month. Employees found in violation of this policy will be subjected to immediate disciplinary action, up to and including termination of employment.

NEPOTISM POLICY

The Organization prohibits working relationships between members of the same family in which one such employee has supervisory or managerial authority over the other family member. Supervisory or managerial authority includes hiring, promotion, salary, performance evaluation and other staffing decisions.

For the purpose of this policy, family members are defined as a spouse, domestic partner, romantic partner, children, parents, siblings, nieces, nephews, grandparents, grandchildren, aunts, uncles, first cousins, and corresponding in-law or step relationships. If such a relationship is discovered, the Organization will take all necessary measures, including separation of employment, to rectify the violation of this policy.

CONSENSUAL ROMANTIC RELATIONSHIPS

The Organization prohibits romantic or sexual relationships between a management 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 him/herself 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.

Additionally, the Organization discourages romantic relationships or sexual relationships between all employees. Such relationships can complicate working associations with other employees, limit an employee's eligibility for transfer or promotion and personal conflicts from outside the work environment can be carried over into day-to-day working relationships. Employees in close personal relationships should refrain from public workplace displays of affection or excessive personal conversation.

If any supervisory or management employee 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 manager. Although the parties may feel that what they do during non-working hours is their business and not the business of the office, because of potential issues regarding "quid pro quo" harassment, this is a mandatory requirement. This requirement does not apply to employees who do not work in the same department or parties who do not supervise or otherwise have management responsibilities over others.

Once the relationship is made known to the Organization, the Organization will review the situation 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. 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, one or both parties may be terminated.

This policy applies to all employees without regard to the gender of the individuals involved.

OUTSIDE EMPLOYMENT POLICY

There have been times when some of us have had the opportunity or the need to have two jobs at one time. However, it is important that the other employment and outside interests do not interfere in any way with your job at the Company. If you do hold a second job, we expect that you will be careful that extra hours of work do not affect your performance here.

If your second job could create a potential conflict of interest, for example, working for a competitor, you

are expected to discuss the matter with the Area Manager.

Activities and conduct away from the job must not compete with, conflict with, or compromise the organization interests or adversely affect job performance and the ability to fulfill all job responsibilities. Employees are prohibited from performing any services for customers on non-working time that are normally performed by our organization. This prohibition also extends to the unauthorized use of any organization tools or equipment and the unauthorized use or application of any confidential information. In addition, employees are not to solicit or conduct any outside business during paid working time.

Employees are cautioned to carefully consider the demands that additional work activity will create before accepting outside employment. Outside employment will not be considered an excuse for poor job performance, absenteeism, tardiness, leaving early, refusal to travel or refusal to work overtime or different hours. All employees will be judged by the same performance standards and will be subject to our organization's scheduling demands, regardless of any existing outside work requirements. If management determines that an employee's outside work interferes with performance, the employee may be asked to terminate the outside employment.

Employees who have accepted outside employment may not use paid sick leave to work on the outside job. Fraudulent use of sick leave will result in disciplinary action up to and including termination.

NON-EMPLOYEE SOLICITATION AND DISTRIBUTION POLICY

The Organization does not permit solicitation or distribution by non-employees at any time on the Organization's premises. Additionally, the Organization prohibits solicitation and distribution by any employee or non-employee during work time. This includes all types of distribution and solicitation such as requests for charitable giving, endorsement of political campaigns, the sale of goods for the benefit of children or partners, and all other similar behaviors. Employees violating such expectations may be disciplined or even terminated.

WORKPLACE SURVEILLANCE AND MONITORING

The Company reserves the right to install security cameras in work areas for specific business reasons, such as security, theft protection or protection of proprietary information.

1. C.W. Roberts Contracting, Inc. may find it necessary to monitor work areas with security cameras when there is a specific job- or business-related reason to do so. The company will do so only after first ensuring that such action is in compliance with state and federal laws.
2. Employees should not have any expectation of privacy in work-related areas.
3. Employee privacy in non-working areas will be respected to the extent possible. CWR's reasonable suspicion of onsite drug use, physical abuse, theft, or similar circumstances would be possible exceptions. Legal advice will be sought in advance in such rare cases where nonwork-area privacy must be compromised.

CWR also may conduct other monitoring of its physical location, computer network or systems, electronic devices, vehicles, and/or other equipment. Our Computer, Telephone, and Communication hardware and software systems have been installed and are used to facilitate *business* communications. Although each

employee has an individual password to access these Systems, they belong to the Organization and the contents of all communications are accessible by management for any business purpose. Communications sent via a personal device also may subject to monitoring if sent through the Organization's networks and the personal device must be provided for inspection and review upon request.

The Organization reserves the right to monitor, and will periodically monitor, its Systems in order to ensure compliance with this Policy. Employees are strictly prohibited from placing personal passwords on any Organization System for the purpose of preventing such monitoring.

The Organization reserves the right to limit or prohibit employee use of electronic communications when necessary to ensure organizational production or to discipline employees for performance related reasons. EMPLOYEES SHOULD NOT CONSIDER ANY MATERIALS TRANSMITTED OR STORED IN ORGANIZATION SYSTEMS TO BE PRIVATE.

Equipment, including vehicles and/or electronic devices, such as cell phones, laptops, or tablets, assigned to you temporarily or permanently is subject to monitoring, including active monitoring such as GPS location monitoring. You should have no expectation of privacy with respect to the use of such equipment. Additionally, you may be asked to surrender the equipment with no notice for a variety of reasons including routine maintenance.

Employees should contact their supervisor or the human resources (HR) department if they have questions about this policy.

NO UNAUTHORIZED RECORDING IN THE WORKPLACE POLICY

Unauthorized electronic surveillance of employees is disruptive to employee morale and inconsistent with the respectful treatment required of our employees. For this reason, no employee may record the activities or conversation of another employee without his or her full knowledge and consent.

No employee may record, by any means, the activities of another employee or conversation with another employee unless the following criteria are met:

1. A legitimate purpose for the recording.
2. A recording device in plain view.
3. Written authorization from the supervisor of the employee who wishes to record the activity or conversation.

Secret recordings are strictly prohibited unless authorized in writing by legal counsel. A violation of this provision may result in disciplinary action, including termination.

BULLETIN BOARDS

We maintain bulletin boards at various locations throughout the Company as an important information source. These bulletin boards are to be used solely to post information approved by the Company regarding Company policies, government regulations, and other matters of concern to all employees which are related to the employees' employment by the Company.

Please develop a habit of checking the bulletin boards daily so that you will be familiar with the information posted there. No information may be placed on these bulletin boards without the approval of the Area Manager.

PERSONNEL RECORDS

Employee personnel records are the property of the Organization and access is highly restricted. Only management personnel who have a legitimate reason to review the information will be allowed to do so. Employees may review the information in their own file at the convenience of management and on Organization property. Employees are not permitted to remove, change, delete or otherwise alter any of the information in the file. Additionally, documents or information contained within the personnel files may not be copied. Copies of documents or information contained within a personnel file are not provided to former employees.

Changes in Personal Information:

To keep your personnel records up to date, to ensure that the Company has the ability to contact you, and to ensure that the appropriate benefits are available to you, we ask that you notify us promptly of any change of name, address, phone number, marital status, drivers' license status, number of dependents, or other applicable information.

VISITORS

Visits by friends or relatives can be disturbing to our operations. Therefore, we strongly discourage such visits during work hours.

ANIMALS IN THE WORKPLACE

The workplace is intended to be devoted to the efficient and effective operation of our Organizational core values. The presence of animals not devoted to accomplishing this objective can be disruptive, non-hygienic, and potentially unsafe. Therefore, animals are not allowed in the workplace. The sole exception to this policy is those service animals providing aides to their owners, under the provisions of the Americans with Disabilities Act (ADA).

A service animal is a dog or miniature horse used as an accommodation who is specifically trained to do work or perform a task for the benefit of an individual with a disability.

The effects of an animal's presence or the provision of emotional support, well-being, comfort, or companionship do not constitute work or tasks for the purposes of this policy.

All of our workplace facilities and properties are covered by this policy at all times.

If an employee has a disability and needs to request a reasonable accommodation under the regulations of the ADA, the employee must contact the Human Resources Department for assistance with proper consideration of the request.

WEATHER RELATED AND OTHER EMERGENCY CLOSINGS

It is our policy to consider the safety of our employees and those we serve when making decisions regarding remaining open during periods of inclement weather. Where extraordinary circumstances warrant, we will close the facility. Our decision to close will be announced or employees will be contacted by management. If the facility remains open, but you are unable to report to work, you should follow our standard procedures for notification of an unscheduled absence.

If the facility is closed, a non-exempt employee may use any available paid time off to cover the absence. If the facility remains open, employees who report to work will receive their normal pay for the day. Those not reporting to work on a facility open day, will be required to use any available paid time off for the missed day. If a non-exempt employee does not have sufficient available paid time off to cover the absence, the absence will be without pay. In accordance with federal regulations, exempt employees will receive their regular pay for the day of closure.

Even if the facility is closed, there may be key positions that will need to report to work. Individuals in those positions will be notified by management with the details of the assignment. Employees who are required to work when a facility is closed will receive their normal pay for the hours worked.

NOTICE OF RESIGNATION

In the event you choose to resign from your position, we ask that you give us at least two weeks' notice. We expect you to take care of all your outstanding accounts with the Company and return all Company property prior to picking up your final paycheck.

JOB ABANDONMENT

Not reporting to work and not calling to report the absence is a no-call/no-show and is a serious matter and will result in discipline.

The Organization will consider an employee to have voluntarily resigned their position with the Organization if the:

- Employee fails to report to work on the expected date of return following an approved absence; or
- Employee fails to provide notice of an unexpected need for an absence and is absent for two consecutive days.

If an employee is a no-call/no-show for two consecutive days, the office manager should send a certified letter to the last known address of the employee. The letter must advise the employee of voluntary termination.

EXIT INTERVIEW

The exit interview is an opportunity for the departing employees to provide feedback on their experience working for C.W. Roberts Contracting, Inc. and to resolve any questions of compensation, benefits continuation, return of Company property, or other related terms. Prior to receiving your final paycheck, an exit interview with your supervisor or Area Manager is requested. Or you may contact Human Resources to request an Exit Interview Questionnaire. Return the Exit Interview Questionnaire to: C.W. Roberts Contracting, Inc., Human Resources, 3660 Hartsfield Rd., Tallahassee, FL 32303.

TO SUM IT ALL UP

This handbook highlights your opportunities and responsibilities at C.W. Roberts Contracting, Inc. It is a guide to your bright future here. By always keeping the contents of the Handbook in mind, you should be successful in your work at C.W. Roberts Contracting, Inc. Once again, welcome to our company, and we look forward to working with you.



Construction Partners, Inc. and Subsidiaries

Employees of Construction Partners, Inc. and its subsidiaries are subject to the following policies and procedures

- Complaint Procedures for Accounting and Auditing Matters
- Code of Business Conduct and Ethics
- Policy Prohibiting Insider Trading and Unauthorized Disclosure of Information to Others
- Professional Certification and Continuing Education Policy

Please contact Human Resources with any questions.

CONSTRUCTION PARTNERS, INC.

COMPLAINT PROCEDURES FOR ACCOUNTING AND AUDITING MATTERS

I. PURPOSE AND STATEMENT OF POLICY

Construction Partners, Inc. (the "**Company**") encourages all employees and other persons associated with the Company to notify the Company's Audit Committee of any complaints or concerns involving the Company regarding accounting, internal accounting controls or auditing matters, including any complaints or concerns regarding questionable accounting or auditing matters (the foregoing being referred to as "**Accounting Concerns**").

The Company requires all employees and other persons associated with the Company to report any known or suspected violations of applicable laws, rules, regulations or the Company's Code of Business Conduct and Ethics or other corporate policies to appropriate Company personnel or through the Company's third-party Compliance Hotline (such reporting being referred to as "**Required Reporting**").

The Company strictly prohibits all Company employees and other persons associated with the Company from retaliating in any manner against any Company employee or other person for lawfully (a) submitting communications to the Company's Audit Committee regarding Accounting Concerns or otherwise as specified in Section 806 of the Sarbanes-Oxley Act of 2002, (b) engaging in Required Reporting, (c) providing truthful information relating to the violation or possible violation of any state or federal law, rule or regulation, in either case to (1) any Company personnel, (2) any state or federal regulatory or law enforcement agency, or (3) any member of any state or federal legislative body or committee thereof, or (d) participating or otherwise assisting in any proceeding relating to any of the foregoing (any such retaliation being referred to as "**Prohibited Retaliation**"). The following procedures shall be followed to implement these policies:

II. PROCEDURES REGARDING ACCOUNTING CONCERNS

A. Scope

These procedures relate to all Company employee complaints or concerns relating to any questionable accounting or auditing matters, including, without limitation, the following:

- Fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
- Fraud or deliberate error in the recording and maintaining of financial records of the Company;
- Deficiencies in or noncompliance with the Company's internal accounting controls;
- Misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports or audit reports of the Company;
- Deviation from full and fair reporting of the Company's financial condition; or any other accounting or auditing matter that the employee reasonably believes to be questionable.

B. Notification Generally

The Company has established a fully confidential, anonymous compliance hotline, available 24 hours a day/seven days a week, toll free, at **1-800-474-1807** (the “**Compliance Hotline**”). The Compliance Hotline is operated by an independent, third party vendor and callers are directed to an operator who is not affiliated with the Company in any way. Calls to the Compliance Hotline are not recorded.

The Company’s board of directors has also appointed Stefan Shaffer to serve as the Company’s Compliance Officer. The Audit Committee has designated the Company’s Compliance Officer as its agent to receive communications regarding Accounting Concerns. Such communications may be submitted through the Company’s Compliance Hotline, or to the Compliance Officer in writing or by e-mail, confidentially and or/anonymously, at the mailing and e-mail addresses set forth below:

Stefan Shaffer, Compliance Officer
Construction Partners, Inc.
290 Healthwest Drive, Suite 2
Dothan, Alabama 36303
sshaffer@sppcapital.com

At a minimum, the following information should be provided in any communication to the Compliance Hotline or the Compliance Officer:

- A description of the nature of the improper activity or matter.
- Name(s) of the employee(s) and department(s) engaging in the activity or involved in the matter.
- Approximate or actual date the activity or matter took place.
- Unless anonymity is desired, a telephone number where the complainant can be reached for further information.
- Any other information helpful to enable the Audit Committee to complete an investigation, if necessary

C. Substitute Notification

If the Compliance Officer is alleged to have been involved in the matters giving rise to the Accounting Concern, communications regarding the Accounting Concern may be submitted confidentially and/or anonymously, at the election of the submitting party, to the Audit Committee through the Compliance Hotline at 1-800-474-1807.

D. Handling of Communications

All communications regarding Accounting Concerns shall promptly be forwarded by the initial recipient thereof to the Audit Committee in the form received (or, in the case of telephonic communications through the Compliance Hotline, in the form of a written transcript) and in the manner directed by the Audit Committee. Such communications may be preceded, accompanied or followed by summaries or commentaries prepared by the initial recipient thereof (or by the Compliance Officer), as directed by the Audit Committee.

E. Response to Accounting Concerns

The Audit Committee shall take or cause to be taken such investigative, remedial or other actions in response to any communication regarding Accounting Concerns as the Audit Committee, in the exercise of its business judgment, deems appropriate.

F. Document Retention

The Audit Committee will maintain a log of all complaints, tracking their receipt, investigation and resolution and shall prepare a periodic summary report thereof. Copies of complaints and such log will be maintained in accordance with the Company's document retention policy.

III. PROCEDURES REGARDING REQUIRED REPORTING

A. Notification Generally

Communications regarding Required Reporting may be submitted to a supervisor other or officer of the company, through the Company's confidential, anonymous third-party Compliance Hotline at **1-800-474-1807**, or to the Compliance Officer in writing or by e-mail, confidentially and or/anonymous, at the mailing and e-mail addresses set forth below:

Stefan Shaffer, Compliance
Officer Construction
Partners, Inc.
290 Healthwest Drive, Suite 2
Dothan, Alabama 36303
sshaffer@sppcapital.com

CONSTRUCTION PARTNERS, INC.

CODE OF BUSINESS CONDUCT AND ETHICS

This Code of Business Conduct and Ethics (the “**Code**”) embodies the commitment of Construction Partners, Inc. (the “**Company**”) to conduct their businesses in accordance with all applicable laws, rules and regulations and the highest ethical standards. All employees, including executive officers, and members of our Board of Directors, are expected to adhere to the principles and procedures set forth in this Code that apply to them. The Company also expects the consultants it retains generally to abide by this Code as well.

1. Compliance and Reporting

Employees and directors should strive to identify and raise potential issues before they lead to problems, and should ask about the application of this Code whenever in doubt. Any employee or director who becomes aware of any existing or potential violation of this Code has an obligation to promptly notify the Company’s compliance officer as shall be designated from time to time (the “**Compliance Officer**”); provided, however, that the Company’s initial Compliance Officer shall be the Company’s Chief Financial Officer. Such communications will be kept confidential to the extent feasible, provided that any concern about questionable accounting or auditing matters submitted by an employee will be kept confidential, and may be made anonymously, to the extent requested by the employee. The Company will take such disciplinary or preventive actions as it deems appropriate to address any existing or potential violation of this Code brought to its attention. If the employee or director is not satisfied with the Company’s response, or if there is reason to believe that notification to the Compliance Officer is inappropriate in a particular case, the employee or director should contact the Audit Committee of the Company’s Board of Directors.

Any questions relating to how these policies should be interpreted or applied should be addressed to the Compliance Officer.

The Company prohibits retaliation of any kind against an individual who has made a good faith report of a violation or potential violation of this Code.

2. Public Disclosure

It is the Company’s policy that the information in its public communications, including all Securities and Exchange Commission (“**SEC**”) filings, be full, fair, accurate, timely and understandable. All employees and directors who are involved in the disclosure process, including the Chief Financial Officer and his staff, are responsible for acting in furtherance of this policy. In particular, these individuals are required to maintain familiarity with the disclosure requirements applicable to the Company and are prohibited from knowingly misrepresenting, omitting, or causing others to misrepresent or omit, material facts about the Company to others, whether within or outside the Company, including the Company’s independent auditors. In addition, any employee or director who has a supervisory role in the Company’s disclosure process has an obligation to discharge his or her responsibilities diligently.

3. *Financial Statement and Other Records*

All of the Company's books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect the Company's transactions and must conform both to applicable legal requirements and to the Company's system of internal controls. Unrecorded or "off the books" funds or other assets should not be maintained unless permitted by applicable laws, rules and regulations.

Employees and directors should always retain or destroy records according to the Company's record retention policies. In the event of litigation or governmental investigation that could involve any particular records, however, none of such records should be destroyed and, in the event that any such records were in the process of being destroyed in the ordinary course of business in accordance with the Company's policies, such destruction shall immediately cease and the Compliance Officer should be consulted immediately.

4. *Compliance with Laws, Rules and Regulations*

It is the Company's policy to comply with all applicable laws, rules and regulations. It is the personal responsibility of each employee and director to determine which laws, rules and regulations apply to his or her position with the Company and to adhere to the standards and restrictions imposed by those laws, rules and regulations.

Generally, it is both illegal and against Company policy for any employee or director who is aware of material non-public information relating to the Company, any of the Company's clients or any other private or governmental issuer of securities to buy or sell any securities of the Company or any such other issuers, or recommend that another person buy, sell or hold the securities of the Company or those other issuers.

Additionally, more detailed rules governing the trading of securities by the Company's officers and directors are set forth in the Company's insider trading policies, as in effect from time to time.

Any employee or director who is uncertain about the legal or other rules involving his or her purchase or sale of any Company securities or any securities in issuers that he or she is familiar with by virtue of his or her work for the Company must consult with the Compliance Officer before making any such purchase or sale.

5. *Personal Conflicts of Interest*

A "personal conflict of interest" occurs when an individual's private interest improperly interferes with the interests of the Company. Personal conflicts of interest are prohibited as a matter of Company policy, unless the Company has approved them in advance. In particular, an employee or director must never use or attempt to use his or her position at the Company to obtain any improper personal benefit for himself or herself, for his or her family members, or for any other person, including loans or guarantees of obligations, from any person or entity.

Any employee or director who is aware of a transaction or relationship that could reasonably be expected to give rise to a conflict of interest should discuss the matter promptly with the Compliance Officer.

6. Corporate Opportunities

Employees and directors owe a duty to the Company to advance the Company's legitimate business interests when the opportunity to do so arises. Generally, subject to the terms of the Company's certificate of incorporation or bylaws, employees and directors are prohibited from taking for themselves (or directing to a third party) a corporate opportunity that is discovered through the use of corporate property, information or position, unless the Company has first been offered the opportunity and turned it down. Additionally, employees and directors are prohibited from using corporate property, information or position for improper personal gain or competing with the Company.

If an employee or director has any question about corporate opportunities or whether any use of Company property or services is improper, such person should consult with the Compliance Officer in advance.

7. Confidentiality

In carrying out the Company's business, employees and directors often learn confidential or proprietary information about the Company, its customers, prospective customers or other third parties. Employees and directors must maintain the confidentiality of all information so entrusted to them, except when disclosure is authorized by the Company or otherwise legally mandated. Confidential or proprietary information includes, among other things, any non-public information concerning the Company relating to its businesses, financial performance, results or prospects, and any non-public information provided by a third party (including a customer) with the expectation that the information will be kept confidential and used solely for the business purpose for which it was conveyed.

8. Fair Dealing

The Company has a history of succeeding through honest business competition. It does not seek competitive advantages through illegal or unethical business practices. Each employee and director should endeavor to deal fairly with the Company's customers, service providers, suppliers, competitors and employees. No employee or director should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair dealing practice.

9. Equal Employment Opportunity and Harassment

The Company's focus in personnel decisions is on merit and individual contribution. Concern for the personal dignity and individual worth of every person is an indispensable element in the standard of conduct that the Company has set for itself. The Company affords equal employment opportunity to all qualified persons. This means equal opportunity in regard to each individual's terms and conditions of employment and in regard to any other matter that affects in any way the working environment for the employee. The Company does not tolerate or condone any type of discrimination prohibited by law, including sexual or other harassment.

10. *Protection and Proper Use of Firm Assets*

All employees and directors should protect the Company's assets and ensure their efficient use. All Company assets should be used for legitimate business purposes only.

11. *Waivers of This Code*

From time to time, the Company may waive certain provisions of this Code. Any employee or director who believes that a waiver may be called for should discuss the matter in advance with the Compliance Officer. Only the Board of Directors or a committee of the Board consisting solely of independent directors may grant waivers hereunder for executive officers or directors of the Company.

CONSTRUCTION PARTNERS, INC.

POLICY PROHIBITING INSIDER TRADING AND UNAUTHORIZED DISCLOSURE OF INFORMATION TO OTHERS

This policy supersedes all previous insider trading policies adopted by our board of directors.

Introduction

Federal and state securities laws generally prohibit any person who is aware of material nonpublic information about a company from trading in securities of that company. These laws also prohibit such person from disclosing material nonpublic information to other persons who may trade on the basis of that information.

Our board of directors has adopted this policy to promote compliance with these laws and to protect you and our company from the serious liabilities and penalties that can result from violations of these laws.

It is your responsibility to comply with the securities laws and this policy. If you have questions about this policy, please contact our Compliance Officer. Information on how to contact the Compliance Officer is set forth under the heading "Company Assistance."

Persons subject to this policy

If you are an employee, officer or director of Construction Partners, Inc. (the "**Company**") or any of its subsidiaries, then this policy applies to you.

It also applies to your family members who reside with you, anyone else who lives with you and any other person or entity whose transactions in Company securities are directed by you or are subject to your influence or control (such as parents or children who consult with you before they trade in Company securities). You are responsible for making sure that these other persons and entities comply with this policy.

In addition to this policy, our directors, executive officers and certain other designated persons who have access to material nonpublic information about us are subject to a supplemental policy that imposes additional restrictions on their trading in Company securities.

If you possess material nonpublic information regarding us at the time of your employment or other services with us terminates, you remain subject to this policy until the information has been publicly announced by us or is no longer material.

Core trading and disclosure restrictions

The following trading and disclosure restrictions apply to all of our employees, officers and directors:

- If you have material nonpublic information regarding us, you must not trade or advise anyone else to trade in our securities until such information has been publicly disclosed.

- If you have material nonpublic information regarding any other company that you obtained from your employment or relationship with us, you must not trade or advise anyone else to trade in the securities of that other company until such information has been publicly disclosed.
- You must not share material nonpublic information with people in our company whose jobs do not require them to have the information.
- You must not disclose any nonpublic information, material or otherwise, concerning the Company to anyone outside the Company unless required as part of your duties and the person receiving the information has a reason to know the information for Company business purposes.

Transactions covered by this policy

This policy applies to any purchase or sale of Company securities, including our common stock, options to purchase our common stock, any other type of securities that we may issue, such as preferred stock, convertible debentures and warrants, as well as exchange-traded options, other derivative securities, and puts, calls and short sales involving Company securities.

Notwithstanding this general rule, certain transactions under Company benefit plans are not prohibited by this policy. These transactions are discussed in this policy under the heading “Exceptions to this policy for certain transactions under Company benefit plans.” In addition, trading in Company securities is not prohibited by this policy if the trades are conducted pursuant to a prearranged trading plan that meets certain conditions. These types of plans are discussed in this policy under the heading “Exceptions to this policy for trades pursuant to prearranged trading plans.”

Definition of material nonpublic information

Material information. Information about our company is “material” if there is a substantial likelihood that a reasonable shareholder or investor would consider it important in making a decision to buy, sell or hold our securities, or if the disclosure of the information would be expected to significantly alter the total mix of the information in the marketplace about us. In simple terms, material information is any type of information that could reasonably be expected to affect the market price of our securities. Both positive and negative information may be material. Information that could be material about our company includes:

- earnings estimates (including changes of previously announced estimates)
- a significant change in our operations, projections or strategic plans
- a potential merger or acquisition
- a potential sale of significant assets or subsidiaries
- the gain or loss of a major supplier or customer
- a new product or discovery
- a significant pricing change in our products or services
- a declaration of a stock split, a public or private securities offering by us or a change in our dividend policies or amounts
- a change in senior management
- an actual or threatened major lawsuit

Nonpublic information. Nonpublic information is information that is not generally available to the investing public. If you are aware of material nonpublic information, you may not trade until the information has been widely disclosed to the public (for example, through a press release or a filing with the Securities and Exchange Commission (the “SEC”)) and the market has had sufficient time to absorb the information. For purposes of this policy, information will generally be considered public after the second full trading day following the Company’s public release of the information. For example, if we issued a press release on a Tuesday, the first day that trading could occur would be on Friday.

If you are not sure whether information is material or nonpublic, consult with the Compliance Officer for guidance before engaging in any transaction in Company securities.

Unauthorized disclosure of information

You are prohibited from disclosing to anyone inside or outside the Company any nonpublic information obtained at or through the Company, except when such disclosure is part of your regular duties and is needed to enable the Company to carry out its business properly and effectively.

We are subject to laws that govern the timing of our disclosures of material information to the public and others. Our Disclosure Policy provides that only certain designated employees may discuss the Company with the news media, securities analysts and investors. All inquiries from outsiders regarding material nonpublic information about the Company should be forwarded to our Chairman of the Board. Accordingly, when an inquiry is made by an outsider, the following response will generally be appropriate:

“As to these types of matters, the Company’s spokesperson is Ned Fleming, our Chairman of the Board. If there is any comment, he would be the one to contact.”

The following procedures are appropriate in protecting the confidentiality of Company information:

(i) avoid discussions of confidential matters in places where they might be overheard or otherwise disseminated; (ii) mark sensitive documents “confidential” and use sealed envelopes marked “confidential”; (iii) secure confidential documents and restrict the copying of sensitive documents; (iv) provide instructions to receptionists regarding outside inquiries; (v) use code names for sensitive projects; (vi) use passwords to restrict computer access; and (vii) do not use any Internet “chat rooms,” message boards, social networking websites or similar medium available to the public to post any unauthorized messages regarding the Company or our business, financial condition, employees, clients or other matters related to us.

Consequences of violating insider trading laws or this policy

The consequences of violating the securities laws or this policy can be severe. They include the following:

Civil and criminal penalties.

If you violate the insider trading or tipping laws, you may be required to:

- pay civil penalties up to three times the profit made or loss avoided
- pay a criminal penalty of up to \$5million
- serve a jail term of up to 20years

In addition, the Company and/or the supervisors of a person who violates these laws may also be subject to civil or criminal penalties if they did not take appropriate steps to prevent illegal trading.

Company discipline.

If you violate this policy or insider trading or tipping laws, you may be subject to disciplinary action by the Company, up to and including termination for cause. A violation of our Company policy is not necessarily the same as a violation of law and we may determine that specific conduct violates our policy, whether or not the conduct also violates the law. We are not required to await the filing or conclusion of a civil or criminal action against an alleged violator before taking disciplinary action.

Reporting of violations.

Any employee, officer or director who violates this policy or any federal or state laws governing insider trading or tipping, or knows of any such violation by any other employee, officer or director, must report the violation immediately to the Compliance Officer.

Exceptions to this policy for certain transactions under Company benefit plans

Certain transactions in Company securities under Company benefit plans are not prohibited by this policy. These are:

Stock option or other equity awards exercises.

This policy does not apply to your exercise of an employee stock option or other equity awards. It also does not apply to your election to have the Company withhold shares subject to an option to satisfy tax withholding requirements. This policy does apply, however, to sales of shares received upon exercise of an option, including any broker-assisted cashless exercise of an option.

Exception to this policy for trades pursuant to prearranged trading plans

The trading restrictions in this policy do not apply to trading in Company securities if the trades occur pursuant to a prearranged trading plan that has been precleared by our Compliance Officer. An SEC rule, Rule 10b5-1(c), provides an affirmative defense from insider trading liability for trades that occur pursuant to a prearranged “trading plan” that meets certain specified conditions. You must enter into the trading plan at a time when you were not aware of any material nonpublic information. In addition, the establishment and operation of the trading plan, as well as any modification or termination of the plan prior to its scheduled expiration date, must (a) comply with the requirements of Rule 10b5-1(c) and any Company policies or guidelines concerning such plans, and (b) be precleared by the Compliance Officer. In preclearing the establishment, operation, modification or termination of a trading plan, neither the Company nor the Compliance Officer will be responsible for determining whether the plan is in compliance with the provisions of Rule 10b5-1(c). Compliance with Rule 10b5-1(c) is solely your responsibility.

Company Assistance

If you have a question about this policy or whether it applies to a particular transaction, contact our Compliance Officer for additional guidance. The Compliance Officer is the Company’s Senior Vice President, Legal, (334) 673- 9763.

Last Modified: December 6, 2018

CONSTRUCTION PARTNERS, INC.

PROFESSIONAL CERTIFICATION AND CONTINUING EDUCATION POLICY

Statement of Policy

This policy establishes a framework for the reimbursement of certain expenses incurred by employees of Construction Partners, Inc. and its operating subsidiaries to obtain and maintain specified professional certifications and to attend relevant continuing education courses.

Definitions

For purposes of this policy, the following terms have the meanings given to them below.

“**Administrator**” means the person(s) designated by the Company to administer this policy.

“**Company**” means Construction Partners Inc. or an operating subsidiary thereof that employs a covered Employee.

“**Covered Employee**” means a full-time, regular employee of the Company who has been employed by the Company for at least three months as of the date of determination and either (i) holds a professional certification in a Covered Field or (ii) is in a position to, or does, exercise influence over the preparation or contents of the Company’s financial statements or related information, including, without limitation, a chief financial officer, chief accounting officer, controller, director of financial reporting, treasurer or any equivalent position.

“**Covered Field**” means, collectively, accounting, finance, engineering and law.

“**Reimbursement Form**” means the Certification / Continuing Education Reimbursement Request Form attached to this policy, as amended or updated from time to time.

Reimbursement of Expenses

The Company will reimburse up to a total of \$1,500 per year incurred by a Covered Employee for (i) fees, dues and other expenses required to maintain licensure or certification in a Covered Field and (ii) tuition and related fees for continuing education courses that are provided through an accredited program and either are required to maintain one or more certifications in a Covered Field or are reasonably related to the Covered Employee’s position with the Company.

The Company will also reimburse reasonable expenses incidental to the foregoing, including for food, travel and lodging. Acceptable forms of continuing education may include college courses, continuing education unit courses, seminars and certification tests. If the continuing education course is graded or offers a certification of completion, the Covered Employee must secure a passing grade or obtain a certification of completion to receive any reimbursement under this policy. Expenses must be validated by receipts, and a copy of the final grade card, certification or other evidence of completion must be presented to show the hours earned or certification received. The Administrator may, in his or her sole discretion and on a case-by-case basis, require additional or different forms of evidentiary documentation or approve amounts for reimbursement greater than the amount set forth above if warranted under the circumstances. Requests may be denied for failing to satisfy the criteria for reimbursement set forth in this policy or for any other reason determined by the Administrator.

Procedures for Requesting Reimbursement

Reimbursement requests will be made and processed according to the following procedures:

- A Covered Employee should obtain approval from his or her supervisor for any required time off from work prior to attending or completing a certification or program.
- After obtaining a certification or completing a course for which the expenses thereof are reimbursable under this policy, the Covered Employee must complete and sign the Reimbursement Form and submit it to the Administrator, together with receipts or other evidence of the payment of the expense(s) to be reimbursed hereunder and evidence of the applicable certification or completion of the program.
- The Administrator may, in his or her sole discretion, request additional information related to the expenses for which reimbursement is requested. In order to be reimbursed under this policy, the Covered Employee must provide the Administrator with such information.
- Upon approval, the Administrator will sign the Reimbursement Form and keep the original for the Company's records. The Administrator will then coordinate the reimbursement through the Company's regular payroll procedures.

Any questions about the foregoing procedures should be directed to the Administrator.

Non-Exclusivity of Policy

Nothing in this policy shall be construed so as to limit the ability of the Company to pay for or reimburse the expenses (i) for programs, courses or materials that are outside the scope of this policy or (ii) that are incurred by employees other than Covered Employees. Any such payment or reimbursement shall be made by the Company in its sole discretion consistent with the interests of the Company at that time.

Certification / Continuing Education Reimbursement Request Form

This form is used to request reimbursement of expenses under the Professional Certification and Continuing Education Policy. To be reimbursable, the expense must be approved by the administrator of the policy for your company. Following your completion of the certification or program, you must complete and submit this form and satisfactory evidence of payment and your completion of the certification or program to the policy administrator.

1. REQUEST FOR REIMBURSEMENT			
Employee Full Name (First MI Last)	Department or Title	Today's Date	
Address	City	State	Zip
			Phone Number ()
Certification or Program:	Type of Expense: <input type="checkbox"/> Professional Certification <input type="checkbox"/> Continuing Education		
Name of Certifying Organization or Program Provider:	Total Cost:		
Why are you seeking this certification or taking this course? <input type="checkbox"/> Related to my current position. If so, how: <input type="checkbox"/> Required to remain in my current position. If so, how: <input type="checkbox"/> Other:			
FOR COMPANY USE ONLY			
Reimbursement approved? <input type="checkbox"/> Yes <input type="checkbox"/> No If No, why:		Administrator Signature: _____ Administrator Signature Date: _____	

2. EMPLOYEE CERTIFICATION	
I certify that I have obtained or completed the certification or program for which I request reimbursement in accordance with the guidelines set forth in the Professional Certification and Continuing Education Policy.	
_____ Employee Signature	_____ Date

C.W. ROBERTS CONTRACTING, INC. EMPLOYEE HANDBOOK

ACKNOWLEDGMENT OF RECEIPT AND UNDERSTANDING

I acknowledge that I have received the C.W. Roberts Contracting, Inc. Employee Handbook and that I will read the policies and become familiar with its contents.

I understand that this Handbook represents only current policies and benefits, and that it does not create a contract of employment. The Company retains the right to change these policies and benefits, as it deems advisable.

I understand that Florida, is an "At Will" state and that I have the right to terminate my employment at any time, with or without cause or notice, and the company has the same right.

I understand that the information I come into contact with during my employment is proprietary to C.W. Roberts Contracting, Inc. and accordingly, I agree to keep it confidential, which means I will not use it other than in the performance of my duties to disclose it to any person or entity outside the Company.

I understand that I must comply with all of the provisions of the Handbook to have access to and use Company resources. I also understand that if I do not comply with all provisions of the Handbook, my access to Company resources may be revoked, and I may be subject to disciplinary action up to and including discharge.

I understand that as a condition of hire I will be under an introductory period during the first 90 days of employment. If my job performance is unacceptable at any time, I may be terminated without prior notice.

I understand that if I am hired as a "full-time" employee working 30 hours or more a week, it is my responsibility to enroll or waive benefits by accessing the PlanSource online portal. Enrollment or waiver of coverage is required within 60 days of my employment. Benefits are effective on the first of the month following 60 days of employment.

I understand that I must inform the Office Manager of any necessary updates to my personnel file such as a change of name, address (even after termination), telephone number, emergency contact, tax withholding deductions, benefits coverage (e.g., marital status, number of dependents), military status, and also inform my supervisor of any outside training, professional certification, education, or any other change in status.

I further understand that I am obligated to familiarize myself with the policies and procedures as outlined in this Handbook of C.W. Roberts Contracting, Inc.

Employee Signature

Date

Print Full Name