

**CNHI**  
LLC

# EMPLOYEE HANDBOOK



# Acknowledgment

This handbook has been given to \_\_\_\_\_ on \_\_\_\_\_

Date of employment (or rehire): \_\_\_\_\_

Welcome to **CNHI, LLC**. You will find information regarding company history, employment and benefits in the Employee Handbook. Please read the Handbook and refer to it when you have questions about your employment. This document acknowledges your receipt of this information and your agreement to abide by these policies.

## At-Will Employment

I understand the provisions in this Handbook are guidelines and do not establish a contract or any particular terms or condition of employment between myself and **CNHI, LLC**. None of the policies constitute or are intended to constitute a promise of employment or a contract of employment. I further understand that **CNHI, LLC** may periodically, at its discretion, change, rescind or add to any policies, benefits or practices with or without prior notice.

To ensure maximum flexibility in choice, I understand the employment relationship is “at will” and is based upon the mutual consent of myself and **CNHI, LLC**. I understand that both **CNHI, LLC** and I have the right to end my employment at any time and for any or no reason, with or without cause or prior notice. I understand that only the Chief Executive Officer or the Human Resources Director, in a written and signed document, have the authority to make a binding contract or promise relating to employment or to modify “at will” employment for any employee under any circumstance. If I am a member of a collective bargaining unit, I understand that my union contract may have provisions that supersede the information contained in this Handbook, and parts of this Handbook may not be applicable to me. If there is a conflict between the information in this Handbook and my union contract, my union contract will be the governing document.

I understand that harassment based on sex, race, age, religion, disability, national origin, ancestry, marital status, sexual orientation or any other characteristic protected by any applicable federal state or local law are prohibited by **CNHI, LLC**. The complaint procedure has been explained to me and I understand that **CNHI, LLC** prohibits retaliation against any employee who complains of or reports harassment.

## Non-Solicitation

During my employment with **CNHI, LLC**, and for the one-year period following termination of employment, I agree not to directly or indirectly attempt to hire away any then-current employee of **CNHI, LLC**, or to persuade any such employee to leave employment with **CNHI, LLC**.

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Date

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## Section I:

# Welcome To CNHI, LLC





Dear **CNHI, LLC** Team Member:

Welcome to our Company! CNHI, LLC. is a privately-held local news and information publisher, covering numerous markets in 23 states. The CNHI, LLC family of publications includes daily and weekly print newspapers, digital sites, shoppers, books and magazines.

CNHI, LLC is a company built on entrepreneurial spirit and a love for local news. Our goal is to serve our communities by providing news and information on a variety of platforms. Our success depends on the commitment and dedication of our valuable team members.

This handbook outlines some of CNHI, LLC's benefits and practices. Team members should read and become familiar with its contents.

We are happy that you have joined our team and hope that you will have a rewarding and successful experience.

Sincerely,

A handwritten signature in black ink that reads "Donna Barrett". The script is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Donna Barrett

President and CEO

## 1.1 Who We Are

**CNHI, LLC**, formed in 1997 and headquartered in Montgomery, Alabama, is the parent company for daily, weekly and semiweekly newspapers published in more than 130 communities throughout the United States. The initials are an acronym for CNHI, LLC.

It is the company's strategy to acquire and operate newspapers in small and mid-sized markets with growth potential. The company's other interests include a variety of ancillary publications and services that complement its newspaper mission.

**CNHI, LLC** was founded by newspaper professionals with extensive expertise in editorial, advertising, circulation and production. The company adheres to the strictest professional and ethical management practices, and of utmost importance, the company desires to produce quality publications. Its officers are dedicated to publishing successful newspapers while striving to create a pleasant working atmosphere in which employees may accomplish their best work.

## 1.2 Company Vision

We will own and operate quality media enterprises that offer growth potential and add value to our company. We will be recognized as the leading provider of community news, information and related services in every market we serve.

## 1.3 Core Values

**We Are A Customer Focused Company.** We recognize that our customers are the only reason we are in business, and we make a commitment to them to listen and respond positively to their needs.

**We Will Conduct Our Business With Integrity.** We will act at all times with integrity and honesty, both in our internal and external dealings, with fairness and straightforwardness of conduct.

**We Are Committed To Excellence.** We will actively seek to achieve and maintain the highest level of excellence in all of our newspapers, products and services we provide for our readers and advertisers. We will adhere to the highest standards of journalistic excellence.

**All Employees Will Be Treated With Respect.** We will treat each other with respect and dignity, with a firm and fundamental belief in human equality. Policies and principles will be applied evenly throughout our company. We will communicate appropriately and effectively at all levels of the organization.

## 1.4 About This Handbook

The provisions in this Handbook are guidelines and do not establish a contract or any particular terms or condition of employment between you and CNHI, LLC. None of the policies constitute or shall be construed to constitute a promise of employment or a promise that CNHI, LLC will follow any particular procedure. Employment at CNHI, LLC is on an “at-will” basis, i.e., just as you have the right to quit your job when you choose, CNHI, LLC reserves the right to terminate your employment at any time and for any reason, with or without notice.

This Handbook supersedes and replaces all previously published employee handbooks.

This Handbook, or any of the policies contained in it, may be updated, discontinued, replaced or revised at any time at CNHI, LLC’s sole discretion. Any changes to this Handbook can only be made in a written amendment approved by CNHI, LLC’s corporate senior executive team. No one may orally update, revise, replace or discontinue the policies of this Handbook.

If you are a member of a union, your union contract may have provisions that supersede the information contained in this Handbook, and parts of this Handbook may not be applicable to you.

**CNHI, LLC will fully comply with all federal, state and local laws with regard to the application of the policies contained in this Handbook.**



## Section II:

# Communication And Employee Relations



## 2.1 Communication Protocol

At **CNHI, LLC**, we believe open communication benefits the individual employee and the organization. This section outlines the contacts and resources available to hear your suggestions and feedback. These people can help answer your questions and address your concerns about **CNHI, LLC** and your interests. Employees are encouraged to follow this “chain of command” when questions and/or concerns arise. However, if an issue arises that is particularly sensitive, such as an issue involving harassment, violation of policy, law or breach of the business conduct policy, you may immediately contact the General Manager, Publisher, Division Manager, Chief Operating Officer, Chief Executive Officer or Corporate Human Resources.

### **Direct Supervisor**

Your direct supervisor or manager generally will be your closest and best resource for most situations. If your supervisor cannot answer your question, he or she will have access to resources who can. In the event that you and your supervisor disagree on an issue, or if the sensitivity of the issue requires another contact, you may contact your local Human Resources Coordinator as an additional resource.

### **Hub Human Resource Coordinator**

Each business group has an employee designated to assist with benefits, payroll and general human resources questions. In some cases, your contact is the Business Manager or Publisher. In other cases, the contact may be off site at another newspaper in your region. Your supervisor has the name and phone number of your local Hub Human Resource Coordinator.

### **Publisher Or General Manager**

Each publication has a leader responsible for ongoing success of the local operation. If your supervisor or manager cannot assist you, the Publisher or General Manager is an appropriate resource.

### **Chief Operating Officer**

Your Publisher or General Manager reports to a **CNHI, LLC** Chief Operating Officer. If your question or issue remains unresolved after contacting your supervisor and local resources, your Chief Operating Officer can assist you.

### **Corporate Human Resources**

The **CNHI, LLC** Corporate Human Resources Department is a resource for escalated employee issues. If an issue has been addressed by the above mentioned levels of management and remains unresolved, or if for some reason the issue requires another contact, the employee should then contact Human Resources at **CNHI, LLC**, 445 Dexter Avenue, Suite 7000, Montgomery, AL 36104, (334) 293-5800 or (800) 951-2644.

## 2.2 Open Door Policy

You are a very important part of our operation. We believe it is extremely important that all employees be heard. In order to enhance the spirit of open communication, **CNHI, LLC** and its management have adopted a policy of communicating honestly and candidly with all employees. **CNHI, LLC** employees should feel free to discuss questions and problems with any level of management of **CNHI, LLC**.

Generally, employees are encouraged to consult their immediate supervisor(s) concerning any questions or difficulties relating to any aspect of their work. Supervisors will follow up on a timely basis when addressing questions or problems of their employees.

An employee who has difficulty communicating with his or her supervisor, or who feels he or she has not received an appropriate response is encouraged to use the “chain of command” (see section 2.1) and seek the next highest supervisor/manager to address his or her concerns, up to and including the President and CEO.

If an employee believes a co-worker or supervisor has violated any provision of policy, the employee is encouraged to immediately report the suspected violation to the Publisher, General Manager, Division Manager, Chief Operating Officer or Human Resources.

All employees should feel they have an “open door” of communication with and from **CNHI, LLC**, up to and including the President and CEO, if necessary.

## 2.3 Sexual And Other Harassment

### Overview

Sexual harassment by anyone (whether at company facilities, on work assignments or at company- sponsored social activities) will not be tolerated. Harassment based on other protected characteristics (race, age, religion, disability, national origin, ancestry, marital status, sexual orientation or any other characteristic protected by any applicable federal, state or local law) is also prohibited. These types of harassment violate company policy and may subject employees to personal liability, as well as immediate termination of employment.

### Definition

Sexual harassment, which is one type of prohibited harassment, is defined as unwelcome sexual advances, requests for sexual favors and other physical, verbal or visual conduct based on sex. Such conduct constitutes sexual harassment when (1) submission to the conduct is an explicit or implicit term or condition of employment, (2) submission to or rejection of the conduct is used as the basis for an employment decision, or (3) the conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile or offensive working environment.

## **Examples of sexual harassment**

The following describes some of the types of acts that may be unlawful sexual harassment and that are strictly prohibited:

- Physical acts of a sexual nature
- Unwanted sexual advances or propositions
- Sexually oriented gestures, noises, remarks or jokes, or comments about a person's sexuality or sexual experience, which create a hostile work environment.
- Sex stereotyping
- Sexual or discriminatory displays or publications anywhere in the workplace
- Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity and the status of being transgender

## **Who can be a target of sexual harassment?**

Sexual harassment can occur between any individuals, regardless of their sex or gender. New York Law protects employees, paid or unpaid interns, and non-employees, including independent contractors, and those employed by companies contracting to provide services in the workplace. Harassers can be a superior, a subordinate, a coworker or anyone in the workplace including an independent contractor, contract worker, vendor, client, customer or visitor.

## **Where can sexual harassment occur?**

Unlawful sexual harassment is not limited to the physical workplace itself. It can occur while employees are traveling for business or at employer sponsored events or parties. Calls, texts, emails, and social media usage by employees can constitute unlawful workplace harassment, even if they occur away from the workplace premises, on personal devices or during non-work hours.

## **Respect For Others**

Some comments, such as those involving a person's dress or appearance, may not rise to the level of harassment, but may be offensive or show a lack of respect for others and are therefore inappropriate. Although CNHI, LLC does not wish to create an environment in which employees are stifled in their conversation, employees are expected to exercise good judgment and professionalism in their conduct and communications with coworkers and customers, as well as to promote respect for all individuals. Behavior tolerated in some social settings may not be appropriate in a work environment.

## **Consequences**

Violations of this policy may result in disciplinary action up to and including termination.

# **2.4 Reporting Harassment**

## **Individual Action**

All employees are responsible for helping to ensure we eliminate harassment from the workplace. Any employee who is the subject of any unwelcome sexually-related or other prohibited conduct or comment should, if they feel comfortable, communicate clearly to the offender that the behavior is not humorous or welcome and should cease immediately. Employees who are advised that particular conduct is unwelcome should cease that conduct immediately.

## **Reporting To Management**

If an employee feels he or she has experienced or witnessed prohibited harassment or inappropriate behavior, the employee must immediately notify their supervisor or the General Manager, Publisher, if the employee prefers, Chief Operating Officer or Human Resources in Montgomery at (334) 293-5800.

## **Supervisory Responsibilities**

All supervisors and managers who receive a complaint or information about suspected sexual harassment, observe what may be sexually harassing behavior or for any reason suspect that sexual harassment is occurring, are required to report such suspected sexual harassment immediately.

In addition to being subject to discipline if they engaged in sexually harassing conduct themselves, supervisors and managers will be subject to discipline for failing to report suspected sexual harassment or otherwise knowingly allowing sexual harassment to continue.

Supervisors and managers will also be subject to discipline for engaging in any retaliation.

## **Investigation**

CNHI, LLC will promptly and thoroughly investigate any allegations of prohibited harassment. CNHI, LLC has an obligation to investigate all complaints and cannot guarantee absolute confidentiality. However, CNHI, LLC will keep all such complaints and the investigations thereof as confidential as is reasonably possible, and will limit the investigation to a “need to know” basis. Any employee who fails to cooperate with CNHI, LLC’s investigation will be subject to discipline, up to and including termination of employment.

## **Consequences**

If an investigation confirms inappropriate behavior, CNHI, LLC will take corrective action, including such discipline as is appropriate, up to and including immediate termination of employment.

## **Legal Protections And External Remedies**

Sexual harassment is not only prohibited by CNHI, LLC but is also prohibited by state, federal, and, where applicable, local law.

Aside from the internal process at CNHI, LLC employees may also choose to pursue legal remedies with the appropriate governmental entities.

## **Local Protections**

Many localities enforce laws protecting individuals from sexual harassment and discrimination. An individual should contact the county, city or town in which they live to find out if such a law exists.

## **Retaliation**

Unlawful retaliation can be any action that could discourage a worker from coming forward to make or support a harassment or discrimination claim. Adverse action need not be job-related or occur in the workplace to constitute unlawful retaliation (e.g., threats of physical violence outside of work hours).

Such retaliation is unlawful under federal and state laws, which protect any individual who has engaged in a “protected activity.” Protected activity occurs when a person has:

- made a complaint of harassment or discrimination, either internally or with any anti-discrimination agency;
- testified or assisted in a proceeding involving harassment under the Human Rights Law or other anti-discrimination law;
- opposed harassment by making a verbal or informal complaint to management, or by simply informing a supervisor or manager of harassment;
- reported that another employee has been harassed; or
- encouraged a fellow employee to report harassment.

## 2.5 Equal Employment Opportunity

In making decisions about employment, it is **CNHI, LLC**'s policy to provide equal employment opportunity without regard to race, color, creed, religion, sex, age, national origin, disability, marital status, veteran status, sexual orientation or any other characteristics protected by applicable federal, state or local law. We do not discriminate in our employment practices with respect to these characteristics, and it is our practice to provide equal opportunity for each employee so he or she can achieve his or her full potential. This policy of nondiscrimination applies not only to initial employment, but also to recruitment, selection, placement, training, promotions, transfers, discipline, salary, benefits or any other factor affecting an individual's employment status with **CNHI, LLC**.

In carrying out its commitment of equal employment opportunity, **CNHI, LLC** will make reasonable accommodations for applicants and qualified employees with a disability unless doing so would create an undue hardship for **CNHI, LLC**, in accordance with its obligations under the Americans With Disabilities Act and any applicable state or local law. Employees who would like an accommodation to assist them in the performance of their job or other employment opportunities should contact their Publisher or General Manager.

If an employee believes he or she has been discriminated against or observes a violation of this policy, he or she should immediately report the issue to the employee's supervisor, a member of **CNHI, LLC** management or to Human Resources.

It is **CNHI, LLC**'s policy to comply fully with all applicable federal, state, and local employment laws.



## Section III:

# Business Ethics, Conduct And Compliance Policies



## 3.1 Business Ethics, Conduct And Compliance Policies

This section highlights policies and procedures regarding business conduct, ethics, conflicts of interest and compliance issues.

The highest standards of individual conduct are expected at all times from each employee, not only in financial matters, but in every aspect of each business and professional relationship. Business must be conducted on the basis of fair dealings, consideration for the rights and feelings of others and the most stringent principles of good corporate citizenship. Newsroom employees are expected to adhere to the highest standards of their trade, and should refer to the current version of CNHI, LLC's Newsroom Guidelines for further direction. Each employee is charged with the responsibility of acquiring sufficient knowledge of laws and company policies and procedures relating to his or her duties in order to recognize potential dangers and to know when to seek further advice. Unlawful conduct will not be condoned under any circumstances. Any violation of our Business Ethics, Conduct and Compliance Policies may result in disciplinary action up to and including termination.

## 3.2 Compliance & Reporting

CNHI, LLC employees are expected to comply with the policies in this section and all other policies and procedures of the company in all respects. Accordingly, employees are expected to disclose promptly (as described below) any acts or transactions that may be in violation of these policies. Failure to disclose matters in accordance with this policy may subject an employee to disciplinary action.

- **What types of incidents should you report?** Incidents involving harm or potential harm to the company, including theft of company property or violations of the company's conflict of interest rules; disregard of compliance procedures such that could expose the company to liability; any other conduct you believe to be a violation of law or company policy. If in doubt, consult Corporate Human Resources.
- **When should you report?** Incidents should be immediately disclosed if you have witnessed wrongdoing, you are aware of facts that lead you to believe there is wrongdoing or you have engaged in wrongdoing you have not previously disclosed.
- **How should you report?** Call any of the individuals listed below. You should use the channel of communication with which you are most comfortable. **Your name will be kept as confidential as reasonably possible during this process. You will never be retaliated against for making a report.**

**Corporate Human Resources at (334) 293-5800, (800) 951-2644**

**Chief Executive Officer at (334) 293-5800, (800) 951-2644**

**Business Conduct and Compliance Reporting Line at (877) 819-2110**

After a report of wrongdoing is received through any of the aforementioned mechanisms, an appropriate investigation will be conducted.

### 3.3 Conflicts Of Interest

**CNHI, LLC** require and expect that business transactions be undertaken solely in the best interests of the Company. Neither an employee nor any member of an employee's immediate family may derive or give the appearance of any improper benefits, directly or indirectly, from the employee's position as an employee from the sale, purchase or other activity involving the Company. The "immediate family" of the employee includes parents, spouse, children, siblings or relatives by marriage.

Acceptance of payments, loans, entertainment, gifts and other benefits by employees. No employee or member of his or her immediate family may seek or accept from any individual doing or seeking to do business with the Company any payment, loan (other than on prevailing terms from financial institutions), service, gratuity, gift (except as indicated below), travel or other improper benefit of more than nominal value resulting from the employee's position with the Company.

In addition, employees and members of their immediate families should not accept entertainment from these individuals of organizations beyond ordinary and reasonable, business-related social amenities (discussed below). Employees should inform all persons doing or desiring to do business with **CNHI, LLC** that the Company discourages acceptance of gifts by employees or members of their immediate family. If a gift is made in cash, it must be returned at once. In the case of any non-cash gift, the following rules shall apply:

- (a) Retail gift with value exceeding \$500.00 (cash or trade). If this gift is received individually or in aggregate from the same individual or organization, the employee must provide written disclosure to Corporate Human Resources. The Company will then decide whether the employee can keep such a gift.
- (b) Entertainment is defined as a non-cash gift that an employee may accept from a third party who is doing or who is seeking to do business with **CNHI, LLC** if such entertainment is limited to ordinary and reasonable social amenities. If such entertainment exceeds \$500.00 (cash or trade) in retail value, it should be reported in accordance with subparagraph (a) above. The "retail value" of a sporting, musical or other entertainment ticket is the stated face value unless the employee is aware that a higher amount has been paid.
- (c) Travel and lodging are not included in the limited exceptions granted for "entertainment" and "gifts" and are prohibited in all circumstances unless unascertainable in value (e.g. corporate guest house) or approval in advance and in writing by Corporate Human Resources.

Organizations that Compete with the Company. No employee may perform services for, serve as an officer, director, employee, or consultant of, or have a substantial interest in any **CNHI, LLC** competitor and/or any of its newspapers and printing companies, unless approved in writing by the President and Chief Executive Officer of **CNHI, LLC** or the President and Chief Executive Officer's designee. "Substantial interest" is defined as an economic interest, personal or family, that might influence or reasonably be thought to influence judgment or action, but shall not include an investment representing less than, in the case of a publicly held company, five percent of the securities of the company, or in the case of a privately owned company, an interest with a value of less than \$25,000.

An employee should make prompt disclosure in writing to Corporate Human Resources, if the employee or a member of an employee's immediate family performs services for, serves as an officer, director, employee or consultant of, or has a substantial interest in any competitor of the Company.

Organizations Doing Business with the Company. No employee may engage in a business transaction with **CNHI, LLC**, nor may any employee work for or own a substantial interest in an organization doing or seeking to do business with the Company, unless approved in writing by the Chief Executive Officer.

Prompt disclosure to Corporate Human Resources is required in the event any employee acquires or becomes aware that a member of his or her immediate family has acquired a substantial interest in an organization doing business or seeking to do business with **CNHI, LLC**.

Prompt disclosure is also required if any employee or member of his or her immediate family becomes involved in a transaction between the Company and another organization wherein a member of the employee's immediate family would benefit or would appear to benefit from this transaction by virtue of his or her position with that organization. This disclosure will be reviewed and the employee will be advised that if a conflict of interest or appearance of a conflict of interest exists.

Opportunities Resulting from Employment. The acquisition by an employee of any interest in any type of property including but not limited to real estate, patent rights, securities, software in which **CNHI, LLC** has or might reasonably be thought to have an interest may create a conflict of interest. Any such contemplated acquisition should be disclosed promptly in written letter to Corporate Human Resources.

Bribes, facilitating payment and other improper payments. No bribes, facilitating payments, kickbacks, or other unlawful or improper methods of remuneration shall be given to any person. Employees may not use outside persons to circumvent this policy.

Business gifts for individuals other than government officials. Gifts in the form of cash or its equivalent shall not be given regardless of the amount.

Employees of the Company may give gifts to individuals other than government employees at Company expense if the following conditions are met: gifts are lawful and in accordance with generally accepted business practices of governing jurisdictions; gifts take the form of sales promotions or incentive trips; specific prior written approval from Corporate Human Resources has been obtained when a gift exceeds the retail value of \$500 (cash or trade).

Gifts should be appropriately reported on the Company's expense report. For the avoidance of doubt, the following items, assuming nominal value, are not subject to the approval requirements of this subsection: candy, beverages, food products, or fruit given for personal consumption, as well as flowers and souvenirs.

### **3.4 Political Contributions**

No employee may make or be reimbursed for any contributions to political parties or candidates for public office on behalf of CNHI, LLC. Employees, except editorial staff, may make individual contributions as long as they are not reimbursed by CNHI, LLC. In order to maintain their editorial independence, newsroom staff are not allowed to make political contributions.

### **3.5 Insider Trading**

**CNHI, LLC** employees may not purchase, sell or otherwise trade in securities of another corporation while in possession of material, non-public information, such as knowledge that the company is planning to acquire another corporation. In addition, employees may not give material non-public information concerning the Company or another publicly traded corporation, directly or indirectly, to anyone. Beyond disciplinary action, a violation of this policy may lead to civil and criminal penalties against the employee.



## Section IV:

# Work Schedules And Pay





## 4.1 Work Schedule

An employee's schedule is designed to meet expected levels of business activity. Your presence at work each scheduled day is important to the successful operation of our business. In addition, because of the nature of our business, you may be expected to be available to work Saturday, Sunday or any other day you might normally have off. Whenever feasible, your work schedule will be furnished to you in advance by your supervisor.

## 4.2 Payroll Procedures

Most **CNHI, LLC** business units operate on a Monday through Sunday payroll schedule each week. Some sites operate on a slightly different, but scheduled, payroll calendar. See your Business Manager for clarification of your site's payroll schedule. Your supervisor will tell you the time and place your paycheck will be distributed.

Deductions will be made from your paycheck in accordance with applicable law (including your federal and state withholding taxes, and your portion of Social Security and Medicare contributions, as well as any garnishments or any other deductions required by law) or, when applicable, as you request, for contributions to company programs such as health insurance or other lawful reasons.

Tax withholding is based on the number of dependents you claimed on the withholding form you completed. Each employee is responsible for the accuracy of that form and for updating the information when necessary. Appropriate withholding forms are available from your local Payroll Coordinator.

Your deductions will be itemized on your payroll stub. You should review your paycheck stub carefully each payday. If you have any questions about the amounts shown on your paycheck or how they are calculated, you should contact your local Payroll or Human Resources Coordinator.

Direct deposit enables employees to have their paychecks deposited directly into their checking or savings accounts each payday at no cost to them. Employees may direct deposit to any bank, savings and loan, credit union or brokerage firm that provides checking, savings or money market accounts and belongs to the National Automated Clearing House Association. A voided check (checking account) or a deposit ticket (savings account) must be on file with the appropriate Direct Deposit Form completed.

Employees taking advantage of this benefit will be able to view their pay stub online, which will show their gross earnings, applicable deductions and the net pay deposited to their account. Employees must update their information in their online profile whenever they have a change to their account information.

## 4.3 Overtime And Recording Work Hours

An exempt employee is one whose duties and responsibilities are of an executive, administrative, or professional character (or other exempt work) as described under the Fair Labor Standards Act (FLSA) and is, therefore, exempt from the overtime and certain other provisions of the FLSA. Exempt employees may be required to perform work in excess of the standard 40-hour workweek without additional compensation.

Non-exempt employees are generally paid on an hourly basis and are covered by state and federal overtime regulations. Non-exempt employees are expected to accurately record all hours of work on forms provided by **CNHI, LLC**. Recorded hours should be signed by both the employee and the employee's supervisor or manager.

The nature of our operation may require that employees work overtime. Non-exempt employees who work more than 40 hours during a work week will receive overtime pay at the rate of pay required by applicable law. All overtime must be scheduled in advance and approved by your supervisor. Failure to obtain advance approval will result in disciplinary action up to and including termination of employment.

**CNHI, LLC** will comply with all applicable federal and state laws regarding payment of overtime.

## 4.4 Permitted Deductions From Salary

An exempt employee who misses one or more full days of work while serving a suspension for violating a safety rule of major significance will not be paid for the number of full days missed. An exempt employee who misses one or more full days of work while serving a disciplinary suspension for violation of a workplace conduct rule will not be paid for the number of full days missed. An exempt employee with depleted vacation, sick or personal leave balances who misses one or more full days of work will not be paid for the number of full days missed.

## 4.5 Salary Basis Safe Harbor Policy

Each employee is designated as either nonexempt or exempt from federal and state wage and hour laws. Nonexempt employees are eligible to receive overtime pay, and must keep accurate time records of all time worked.

If you are an **exempt** salaried employee, the Fair Labor Standards Act (FLSA) requires that you must receive your regular salary each week in which you perform any work, subject to certain exceptions delineated by the United States Department of Labor. It is our policy to comply with the salary basis requirements of the FLSA. Therefore, we prohibit all company managers from making any improper deductions from the salaries of exempt employees. We want employees to be aware of this policy and that the Company does not allow deductions that violate the FLSA.

## **What To Do If An Improper Deduction Occurs**

If you believe that an improper deduction has been made to your salary, you should immediately report this information to your Human Resources Coordinator or Business Manager.

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. The Company does not tolerate any retaliation against those who make such reports.

## **4.6 Classification Of Employees As Regular Full Time, Regular Part Time Or Temporary**

For purposes of determining eligibility for benefits, a regular full-time employee is one who works a regular schedule of 30 hours or more each week. Employees regularly working less than 30 hours each week will be classified as part time. Employees working on a short term, seasonal or project basis will be classified as temporary. Temporary and part-time employees are not eligible for fringe benefits except those required by law or as described in this Handbook. To determine your eligibility for participation in **CNHI, LLC**'s specific benefit options, you should consult the terms of the summary plan descriptions of each.

If your classification as a **CNHI, LLC** employee changes from temporary or part time to full time, prior service will be taken into consideration in terms of satisfying the waiting period for benefit eligibility. For example, if a part-time employee of six years becomes full time, he or she would be eligible to participate in the benefit program immediately. The waiting period for vacation would also be waived. Additional weeks of vacation would be granted based on years of service as a full-time employee.

Paid vacations and sick leave are granted only to regular full-time employees. Paid holidays are granted to full-time employees. Straight-commissioned sales persons are eligible for vacation, sick, personal and holiday time off. Pay received during these periods of time away from work will be based solely upon the employee's commission structure unless otherwise required by state law.

## Section V:

# Time Away From Work



## 5.1 Paid Vacations

Vacation days must be taken during the year in which they fall due. They do not carry over from year to year. Therefore, vacation granted must be taken by December 31 of each year. On the first of the month following six months of employment, all regular full-time employees are eligible for a vacation grant according to the schedule below:

<b>If The Employee First Becomes Eligible</b>	<b>Vacation Grant</b>
January – March	Full Annual Grant
April – June	Three-Fourths Annual Grant
July – September	One-Half Annual Grant
October – December	One-Fourth Annual Grant

For example: If an employee is hired on May 15, he or she would be eligible for vacation for the first time on December 1, and would fall into the one-fourth annual grant category.

Each January 1, all regular full-time employees who have met the above noted six-month service requirement would be eligible for a vacation grant based on the following schedule:

<b>Years Of Service</b>	<b>Vacation Grant</b>
From the completion of the initial six month service requirement to five years	Two weeks granted on January 1
Six to fifteen years	Three weeks granted on January 1
Over fifteen years	Four weeks granted on January 1

An employee who leaves **CNHI, LLC**'s employment and returns with a break in service greater than three months will be treated as a new employee for purposes of this policy.

### Anniversary Date Changes

If an employee's service date causes him or her to have an anniversary in the middle of the year that would entitle him or her to additional vacation, the vacation grant will be prorated according to the schedule below:

<b>Anniversary Date</b>	<b>Vacation Grant</b>
January – March	Full difference between current and new grant
April – June	Three-fourths of difference between current and new grant
July – September	One-half of difference between current and new grant
October – December	One-fourth of difference between current and new grant

For example: An employee with an original hire date of August 20, 2010, will have his or her five- year anniversary on August 20, 2015. At that time, the vacation grant for the remainder of the 2015 year would be adjusted by adding 50% of the one additional week the employee would now be entitled to as a five-year employee. For the remaining 2015 calendar year, the employee would be entitled to a total of two and one-half weeks of vacation. On January 1, 2016, the employee would receive a three-week vacation grant.

## **Vacation Guidelines**

Vacation is a grant and not “earned” compensation. The following guidelines apply:

- All vacation must be taken by December 31 and may not be carried over into any subsequent calendar year.
- Unused vacation is not converted to cash payments upon termination of employment (whether voluntary or involuntary) nor under any other circumstance. CNHI, LLC does not give cash in lieu of vacation time. Thus, unless otherwise required by mandatory state law, unused vacation time is forfeited upon termination of employment (whether voluntary or involuntary).
- No vacation time may be taken after notice of termination has been given unless specifically requested and approved prior to notice of termination. Such pre-approved vacation must be taken during said notice period.
- Vacation must be requested in advance and the request must be in writing.
- Vacation requests are subject to your supervisor or manager’s approval and such approval will be dependent upon business conditions.
- Management may, in its discretion, deny, postpone or cancel requested time off to meet the business needs of the organization.

**CNHI, LLC** will comply with all applicable federal and state laws with respect to the treatment of vacation.

## **5.2 Paid Holidays**

**CNHI, LLC** observes the following holidays:

- |                  |                      |                 |                  |
|------------------|----------------------|-----------------|------------------|
| • New Year’s Day | • Martin Luther King | • Memorial Day  | • Fourth of July |
| • Labor Day      | • Thanksgiving Day   | • Christmas Day |                  |

All regular full-time employees will be given holidays off with pay, providing they are available to work on the day preceding and the day following the holiday. Prescheduled time off is considered time worked for purposes of this policy.

Regular full-time hourly employees required to work on the holiday will be given another mutually agreed day off, during that same pay period, with pay.

## **5.3 Personal Days**

Three personal days are granted on January 1 of each year. Personal days must be scheduled in advance with the employee’s supervisor and pay will not be given in lieu of time off for personal days. Unused personal days are not cumulative and are not paid out at time of termination. A regular full-time employee joining **CNHI, LLC** prior to July 1 is eligible for the full grant of personal days during the first calendar year of employment. A regular full-time employee joining **CNHI, LLC** on or after July 1 is eligible for one-half the calendar year grant.



## 5.4 Sick Leave Policy and Sick Days

Regular full-time employees will be granted five paid sick days on January 1 of each calendar year. Sick days may be carried over from year to year, subject to a maximum accumulation of 30 days. CNHI, LLC will not pay for unused sick leave days, and they are not paid out at termination of employment (whether voluntary or involuntary). Paid sick days may be used only for days off due to the employee's own personal illness or the illness of a dependent child or spouse. An acceptable certification from a healthcare provider may be required.

Employees missing work because of illness must notify their supervisor promptly and directly of their illness. Absent an emergency, this notification should occur at least one hour before scheduled work time. For the purpose of calculating sick pay, a sick day should be prorated, based on the number of hours an employee regularly works.

A regular full-time employee joining **CNHI, LLC** prior to July 1 of a given year is eligible for the full grant of five days of sick leave during that year. A regular full-time employee joining **CNHI, LLC** after July 1 is eligible for two-and-a-half sick days during that year.

### Additional Notes Regarding Vacation, Personal and Sick Days

Vacation, Sick and Personal leave is prorated based on regularly scheduled work hours. As an example, if a regular full-time employee is scheduled to work six hours per day (30 hours per week), each vacation, personal or sick day granted would equal six hours.

Straight-commissioned sales persons are eligible for vacation, personal and sick time off. Pay received during these periods of time away from work will be based solely upon the employee's commission structure unless otherwise mandated by state law.

If an employee is out on leave at the end of the year and the leave of absence extends into a new calendar year, the employee will not be allowed to carry over any unused vacation or personal leave into the new year. In addition, the employee must work one day in the new calendar year to be eligible for the vacation, sick and personal leave that is normally granted at the beginning of the year.

## 5.5 Other Military Leave

Regular full-time employees fulfilling military reserve duties are eligible for up to two weeks leave with pay per year (minus military pay). Employees must notify their supervisors upon receiving military orders. Employees must provide written orders and their military pay stub in order to be paid for the leave. Any additional military leave beyond two weeks will be handled in accordance with all applicable laws regarding military leaves of absence.

## 5.6 Bereavement Policy

Full-time employees may take up to three consecutive scheduled workdays off from regularly scheduled duty with regular pay in the event of a death in the immediate family. Immediate family is defined to include your spouse, son, daughter, mother, father, brother, sister, aunt, uncle, niece, nephew, in-law relationships, step relationships, grandparents and grandchildren.

Eligible employees must notify their supervisor of the event as soon as possible. The supervisor should be told the name of the deceased, the relationship of the deceased, when and where the services are being held and when the employee is expected to return to work. The length of funeral leave (up to three days) must be approved by the employee's manager and will depend on individual circumstances (e.g., location of the funeral and travel requirements). Bereavement leave can only be taken at the time of death and will not be paid out if not used. Any leave beyond three days will be unpaid and must be approved by your supervisor.

## 5.7 Jury Duty

Regular full-time employees who have proper proof of jury duty are eligible for leave with pay equal to their regular salary. Employees must notify their supervisor (within a reasonable time after receipt of the summons) of the dates they are required to be available for jury duty. An employee required to be available for jury duty, but not required to be in court must report to work. CNHI, LLC complies with all applicable state laws regarding jury duty.

## 5.8 Family And Medical Leave Policy

CNHI, LLC provides a total of up to 12 weeks of unpaid, job-protected leave during a rolling 12-month period to eligible employees for certain family and medical reasons pursuant to the Family and Medical Leave Act of 1993 (FMLA). CNHI, LLC generally requires that FMLA leave is taken concurrently with paid vacation, sick leave, short-term disability leave or workers' compensation leave.

An employee is eligible for FMLA leave only if he or she has worked for CNHI, LLC for at least 12 months (not necessarily consecutive), has worked at least 1,250 hours during the 12-month period immediately preceding commencement of the FMLA leave, and works at a site with at least 50 employees within a 75-mile radius.

### Reasons For Taking FMLA Leave

Unpaid FMLA leave is available to eligible employees for any of the following reasons:

- In connection with the birth or adoption of a child, including placement of a child in an employee's home for foster care. If a husband and wife are both employed by CNHI, LLC, only a total of 12 weeks between them in a rolling 12-month period may be taken because of the birth, adoption or foster case placement of a child.
- To care for an employee's spouse, son, daughter or parent who has a serious health condition.
- For a serious health condition that makes the employee unable to perform the essential functions of his or her job.

### Definition Of A Serious Health Condition

A serious health condition means an illness, injury impairment, or physical or mental condition that involves one of the following:

**Hospital Care:** Inpatient care (i.e., an overnight stay) in a hospital, hospice or residential medical care facility, including any period of incapacity or subsequent treatment in connection with or consequent to such inpatient care.

**Absence Plus Treatment:** A period of incapacity of more than three consecutive calendar days (including any subsequent treatment or period of incapacity relating to the same condition) that also involves: (a) treatment of two or more times, within 30 days of the first day of incapacity (unless extenuating circumstances exist), by a health care provider, by a nurse or physician's assistant under direct supervision of a health care provider, or by a provider of health care services (e.g., physical therapist) under orders of, or on referral by, a health care provider; or (b) treatment by a health care provider on at least one occasion which results in a regimen of continuing treatment under the supervision of the health care provider. The first (or only) in-person treatment visit must take place within seven days of the first day of incapacity.

**Pregnancy:** Any period of incapacity due to pregnancy, or for prenatal care.

**Chronic Conditions Requiring Treatments:** A chronic condition which (a) requires periodic visits (at least twice a year) for treatment by a health care provider or by a nurse or physician's assistant under direct supervision of a health care provider, (b) continues over an extended period of time (including recurring episodes of a single underlying condition), and (c) may cause episodic rather than a continuing period of incapacity (e.g., asthma, diabetes, epilepsy, etc.).

**Permanent/Long-term Conditions Requiring Supervision:** A period of incapacity which is permanent or long-term due to a condition for which treatment may not be effective. The employee or family member must be under the continuing supervision of, but need not be receiving active treatment by, a health care provider. Examples include Alzheimer's, a severe stroke or the terminal stages of a disease.

**Multiple Treatments (Non-Chronic Conditions):** Any period of absence to receive multiple treatments (including any period of recovery there from) by a health care provider or by a provider of health care services under orders of, or on referral by, a health care provider, either for restorative surgery after an accident or other injury, or for a condition that would likely result in a period of incapacity of more than three consecutive calendar days in the absence of medical intervention or treatment, such as cancer (chemotherapy, radiation, etc.), severe arthritis (physical therapy) and kidney disease (dialysis).

## **Advance Notice And Medical Certification**

An employee is expected to provide at least 30 days' notice to his or her supervisor before leave is to begin. If 30 days' notice is not practical (for example, because of a medical emergency), an employee must provide notice as soon as possible. The notice must identify the reason why leave has been requested and the expected dates and duration of the leave. **CNHI, LLC** may ask for further information necessary to determine if the employee is seeking FMLA leave and the details of the leave to be taken.

An employee must provide a medical certification on a form provided by **CNHI, LLC** to support a request for leave because of his or her own serious health condition or the serious health condition of a family member. In general, an employee must provide the medical certification within 15 days of **CNHI, LLC's** request (which will usually occur at the time the employee gives notice of the need for leave). If the need for leave is unforeseen, medical certification must be provided within 15 days after the leave commences. A recertification may be required periodically thereafter. It is the employee's responsibility to obtain a properly completed medical certification form from a physician or other appropriate health care provider.

If for any reason **CNHI, LLC** questions the adequacy or validity of a medical certification, **CNHI, LLC** may require a second opinion from a health care provider selected by **CNHI, LLC** at its expense. If the medical certification and the second opinion are different, **CNHI, LLC** may require a third opinion, at **CNHI, LLC's** expense, which will be final and binding.

Failure to supply a valid medical certification within the allowable time frames or to give timely notice may result in a delay or denial of FMLA leave and benefits. Medical certification should be sent to the **CNHI, LLC** Montgomery HR department. **CNHI, LLC** may also require a fitness-for-duty report before an employee who has been absent for one week or more because of his or her own serious health condition may return to work. It is the employee's responsibility, not **CNHI, LLC's**, to obtain such a report from a physician or other appropriate health care provider.

## **Scheduling Of Leave**

FMLA leave is available for up to 12 weeks during a rolling 12-month period. This 12-month period is measured backward from the date an employee uses any FMLA leave. For example, if an employee has taken eight weeks of leave during the past 12 months, an additional four weeks of leave could be taken.

FMLA leave taken in connection with the birth or adoption of a child must always be taken on a full-time basis. Leave may be taken on an intermittent or reduced schedule if required by a serious health condition. The employee's medical certification must include the medical necessity for an intermittent or reduced leave schedule. In this case, the amount of leave actually taken will count toward the maximum of 12 weeks available. If an employee requests intermittent or reduced scheduled leave, **CNHI, LLC** may temporarily transfer him or her to a position with equivalent pay and benefits that better accommodate the leave than the employee's regular position. In planning FMLA leave, an employee must consult with his or her supervisor and attempt to schedule leave so as not to unduly disrupt **CNHI, LLC's** operations.

## **Maintenance Of Benefits And Restoration Of Employment**

While an employee is on FMLA leave, **CNHI, LLC** will continue his or her benefits on the same basis as coverage would have been provided if the employee remained actively employed. The employee is required to pay all applicable premiums for benefits while he or she is on FMLA leave in order to maintain coverage. The employee may choose not to retain benefit coverage during FMLA leave. In that case, when the employee returns from leave, benefit coverage will be reinstated on the same terms as before the leave, without any qualifying period. If the employee fails to return to work following the leave, he or she may be required to reimburse **CNHI, LLC** for any premiums paid on the employee's behalf, including premiums for the employee's own coverage, in accordance with the requirements of the FMLA.

Employees who return to work from FMLA leave within 12 weeks will be restored to the same position held when leave began, or to an equivalent position with equivalent pay, benefits and other terms and conditions of employment in accordance with the requirements of the FMLA. Benefits and seniority earned before FMLA leave cannot be lost because of leave. Exceptions to such restoration will include, but not be limited to, changes in the work force such as reductions-in-force or elimination of positions/departments such that there is no position to which the employee would be entitled if the employee had not taken the leave.

Unless otherwise required by law, an employee granted a leave of absence under these provisions who fails to return to work upon expiration of the leave granted may be classified as “voluntarily terminated.” Absences due to the employee’s own serious health condition that extend beyond 12 weeks may qualify for additional leave as noted below.

### **Additional Leave**

FMLA leave may also be taken by a spouse, son, daughter, parent or next of kin for up to 26 workweeks of leave in a single 12-month period to care for a member of the Armed Forces, including a member of the National Guard or Reserve, who is undergoing medical treatment, recuperation or therapy, is otherwise in outpatient status, or is otherwise on the temporary disability retired list, for a serious injury or illness, or a veteran who is undergoing medical treatment, recuperation or therapy, for a serious injury or illness and who was a member of the Armed Forces, including a member of the National Guard or Reserve, at any time during the 5-year period preceding the date on which the veteran undergoes that medical treatment, recuperation or therapy.

An employee may also take FMLA leave for any qualifying exigency arising out of the fact that the spouse, son, daughter or parent of the employee is on active duty (or has been notified of an impending call or order to active duty) in the Armed Forces in support of a contingency operation.

## **5.9 Lactation Support In the Workplace**

**CNHI, LLC** will provide, to the extent reasonably possible, a private location where an employee can express breast milk. An employee who needs to express breast milk may do so during any regular lunch or break time. Employees will be allowed reasonable paid breaks (typically not to exceed 20 minutes) to express breast milk. Employees may keep expressed breast milk in their own cooler packs.



## Section VI:

# Work Policies





## 6.1 Employee's Work Obligation

All employees of CNHI, LLC have a responsibility to report for work on time and prepared to perform their jobs in a professional and businesslike manner and to maintain performance during the hours they are scheduled to work. Employees are not allowed to devote work time or **CNHI, LLC** resources to any activity, business or enterprise other than **CNHI, LLC**.

## 6.2 Feedback And Performance Management

Your supervisor will periodically provide you with informal and formal feedback regarding your performance. We expect that employees and supervisors will communicate on a regular basis, and each employee should receive an annual performance review. If you want feedback regarding your performance, discuss this with your immediate supervisor.

## 6.3 Promotion Policy

**CNHI, LLC** is committed to promoting qualified individuals from within the company whenever possible. Only persons who have demonstrated superior performance in their previous position(s) with **CNHI, LLC** will be eligible for promotion.

**CNHI, LLC** will generally post job vacancies for a reasonable period of time. **CNHI, LLC** may simultaneously advertise or recruit to find qualified applicants. If you wish to be considered for advancement, however, you should let your supervisor know of your wishes and communicate with your supervisor periodically about positions that may be open.

## 6.4 Absenteeism And Tardiness Policy

You are a vital asset to **CNHI, LLC** and your regular attendance is essential to our success. You are required to report to work promptly and work the hours scheduled for your position. Employees who leave their workstations without approval or are otherwise absent necessitate time-consuming and costly rescheduling, unnecessarily increase the workload of other employees and hurt **CNHI, LLC's** overall productivity. Managers will monitor the attendance of their staff(s). Supervisors will keep accurate records and document conversations with employees concerning attendance and punctuality. Attendance is an important part of an employee's performance and, except as stated below or prohibited by law, will be considered in granting wage increases and conducting performance reviews.

Employees are expected to personally notify their supervisor at least one hour in advance of their scheduled starting time each day if they must be absent from or late to work. If an hour's notice is not feasible because of an unforeseen emergency, notice must be given as soon as possible. If it becomes necessary for an employee to leave work because of an illness or personal emergency, the employee should notify his or her supervisor before leaving or at the earliest possible time.

Unscheduled absences of two consecutive working days without the approval or notification of management will be treated as a voluntary resignation.

Violations of attendance requirements and/or unexcused absences will result in disciplinary action up to and including termination. An employee who is denied permission to take a day off and proceeds to be absent without justification may be terminated for insubordination.

CNHI, LLC may also require a medical evidence of illness and/or fitness-for-duty report.

**Absences that qualify for or are protected under the Family and Medical Leave Act (FMLA) or other applicable laws are not subject to this policy.**

## 6.5 Use Of Drugs Or Alcohol

CNHI, LLC has a strong commitment to provide a safe and drug-free workplace. CNHI, LLC fully expects employees to report for work in condition to perform their duties.

It is against company policy:

- To use, be under the influence of, sell, distribute, dispense, or possess illegal narcotics, drugs or controlled substances (including the illegal use of prescription drugs) while on the job or on company property. Any illegal substances will be turned over to the appropriate law enforcement agency and may result in criminal prosecution.
- To report to work under the influence of alcohol, possess or consume alcohol on the job.
- To be convicted of illegal drug use.

Violation of this policy may be grounds for immediate termination.

CNHI, LLC may choose at its discretion, unless prohibited by state statute, to request that an employee submit to drug and/or alcohol screening if there is reasonable suspicion that the employee is under the influence of drugs and/or alcohol. Employees may refuse such requested screening tests; however, refusal by any employee to cooperate in such lawfully permitted tests will be cause for disciplinary action up to and including discharge. Additionally, each local business unit may, as part of its drug-free workplace program, implement a drug and alcohol testing policy that complies with applicable state law.

## 6.6 Smoking

All CNHI, LLC buildings are smoke free. Smoking is permitted in designated smoking areas outside. Smoking should be limited to the period of time an employee is on a scheduled break. Where any customer or supplier has a policy relating to the use of smoking and nonsmoking areas, CNHI, LLC employees are expected to comply with that policy.

In certain locales, specific ordinances or statutes have been enacted requiring smoking guidelines. All employees are expected to be knowledgeable of those local standards and to adhere to them.

## 6.7 Discipline And Discharge

Employment at CNHI, LLC is “at will,” meaning both CNHI, LLC and its employees have the right to terminate employment at any time and for any or no reason with or without notice or prior disciplinary action. Typical disciplinary actions include verbal warnings, written warnings, suspensions and terminations, although there is no guarantee CNHI, LLC will apply progressive discipline in any case. Disciplinary action will be taken when an employee engages in inappropriate conduct or if an employee is unable to maintain a satisfactory level of performance. Various policies in this Handbook include examples of the type of conduct that will give rise to disciplinary action up to and including termination of employment. Following are examples of conduct that could result in immediate termination. This list is not exclusive:

- Falsification or alteration of company books, records and accounts (electronic or physical), including but not limited to employment applications and timecards.
- Participating in the unauthorized release of business secrets or other confidential information.
- Making maliciously untrue statements about coworkers.
- Refusing to follow the directive of a supervisor or other manager.
- Discourtesy to a customer.
- Fighting or gambling on company premises.
- Theft, misappropriation, misuse or willful destruction of the property of CNHI, LLC, a coworker, guest of the company or the unauthorized removal of any such property.
- Violation of CNHI, LLC’s Business Ethics, Conduct and Compliance Policies.
- Violation of CNHI, LLC’s Sexual and Other Harassment Policy.

## 6.8 Nepotism Policy

**CNHI, LLC** discourages the hiring of relatives (or significant others) of **CNHI, LLC** employees. It is **CNHI, LLC**’s policy that relatives (or significant others) not work in direct reporting relationships.

Hiring, promotion, salary adjustments, transfer or dismissal must be determined one level above the senior (by job function) relative in any operation of the company.

For purposes of this policy, “relative” or “related employee” is defined as father, mother, sister, brother, spouse, child, cousin, aunt, uncle, niece, nephew or such relative by marriage (i.e. in-laws). This definition does not include spouses in states where marital status discrimination is prohibited.

This policy does not apply to temporary or seasonal part-time work.

## 6.9 Non-Employee Visits To CNHI, LLC

During business hours and while at **CNHI, LLC** properties, **CNHI, LLC** expects its employees to be engaged in those activities and responsibilities related to the conduct of **CNHI, LLC**'s business. Those activities include performing duties in a professional and business-like manner and providing the best quality customer service.

Non-employees (friends and relatives) are discouraged from visiting work sites. Employees are not allowed to bring children to work outside of company-sponsored events. Non-employees are prohibited from accompanying an employee on company business. Any visit must receive advance approval.

Non-employees may never assist a **CNHI, LLC** employee in the performance of the employee's job duties.

## 6.10 Telephone Usage

Contact with the public is important to our business. Telephone courtesy is essential, as you represent **CNHI, LLC**. **CNHI, LLC** recognizes there may be an occasion when it is necessary to make or receive a personal call at work. Abuse of this privilege, however, is subject to discipline. Employees should not become involved in personal calls for more than a few minutes in length and are not authorized to make non-business calls that will result in any company toll charges. For business reasons, **CNHI, LLC** may monitor telephone usage in accordance with applicable law.

## 6.11 Dress Codes

Employees should effectively represent the Company by maintaining good personal hygiene and a good professional image. Many of **CNHI, LLC**'s clients and prospective clients have occasion to visit **CNHI, LLC** facilities, and we always want to make a favorable impression. Local management will establish dress codes in accordance with customary business attire in the local business community. **CNHI, LLC** reserves the right to determine that particular attire is inappropriate for its businesses and to inform you of this and instruct you to change inappropriate attire. **CNHI, LLC** respects the religious beliefs and practices of its employees; if you need accommodation with respect to attire for religious reasons, please let your supervisor or your local Human Resources Coordinator know.

## 6.12 Expense Reimbursement

**CNHI, LLC** will reimburse employees for reasonable and necessary expenses incurred in the performance of company business in accordance with **CNHI, LLC**'s Expense Reimbursement Policy. Prior approval must be obtained to assure reimbursement.

**CNHI, LLC** will reimburse employees for use of their personal vehicles on company business at the mileage rate authorized at your facility, as well as for parking and tolls when traveling on company business.

To be reimbursed, a completed expense report must be prepared, approved by the employee's supervisor and forwarded to the Accounts Payable Department for payment.

## 6.13 Solicitation And Distribution

**CNHI, LLC** prohibits solicitations on its premises, whether made by employees or by individuals or groups not associated with **CNHI, LLC**, as set forth below.

### Definitions

**Solicitation:** For the purpose of this policy, any form of solicitation, whether for membership, subscriptions, money, gifts or the purchase of merchandise, tickets or services.

**Distribution:** For the purpose of this policy, the distribution of any literature, merchandise or thing that is not being distributed in the normal course of the business of **CNHI, LLC**.

Employees of **CNHI, LLC** may not engage in solicitation or distribution during their “working time” or during the working time of the employee or employees to whom the solicitation or distribution is directed. “Working time” is time when an employee is normally expected to be at his or her work station performing his or her actual job duties (not including the employee’s own time, such as approved break times and lunch periods). Employees of **CNHI, LLC** may not distribute literature or materials in work areas at any time,

Non-employees may not engage in solicitation or distribution on **CNHI, LLC**’s premises at any time.

## 6.14 Bulletin Boards

Official **CNHI, LLC** notices and business communications are posted in each **CNHI, LLC** office. This board is designated for posting legal notices to employees and company-sponsored communications only. Employees may not post information or literature on company bulletin boards at any time. Any such information or literature will be promptly removed, regardless of the content. Employees have the responsibility of checking this board regularly for current company information.

## Section VII:

# Security And Safety





## 7.1 Use And Protection Of Company Assets And Transactions

Employees who have access to or control over Company transactions and assets, including trade secrets or other confidential or proprietary information (whether in printed or electronic form) must assure that each acquisition or disposition of an asset by an employee on behalf of the Company is undertaken in accordance with the general or specific authorization of management, and is accurately and fairly recorded in reasonable detail in the Company's books of account and records. "Confidential or proprietary information" generally includes all information that the employee knows or has reason to know and is deemed by the Company to be secret, that is in the possession of the Company and that has not been published or otherwise disclosed to any third party or to the general public.

Unauthorized disclosure of **CNHI, LLC** business secrets or other confidential information is against **CNHI, LLC** policy. It is also the Company's policy to respect all trade secrets and confidential and proprietary information of other companies, including competitors and companies where employees may have been previously employed. Employees may not use such information for the benefit of the Company or disclose it to other employees of the Company. Employees should consult with Corporate Human Resources if they have questions about the application of this policy to their particular circumstances.

All Company books, records and accounts must accurately reflect the precise nature of the transactions recorded. Making false or fictitious entries with respect to transactions of the Company or the disposition of corporate assets is prohibited, and no employee may engage in any transaction that requires making false entries.

## 7.2 Use Of Company Property

**CNHI, LLC** entrusts to its employees the proper use of **CNHI, LLC** facilities, property, equipment, records, photographs, negatives, files, funds and other property. Company-owned or leased property and equipment is to be used by employees only for company business.

Therefore, any unauthorized personal use of **CNHI, LLC** property and/or equipment, records and files, either during or outside of business hours, is strictly prohibited.

The theft, abuse, destruction or unauthorized use or removal of company property or assets (including electronic computer media and files) or personal property of a fellow employee is forbidden and shall be grounds for immediate dismissal and termination of employment. If you become aware of loss or theft, inform your supervisor.

On the employee's date of termination, all company property, equipment, records, credit cards, keys, files, account lists or assets, either issued, assigned or in the possession of a terminating employee, must be returned in reasonable condition, free of abuse or damage.

**CNHI, LLC** reserves the right to inspect an employee's work area, including the contents of an employee's desk, for business reasons.

**CNHI, LLC** cannot be responsible for any theft of an employee's personal items.

## 7.3 Software, Hardware And Information Security Policy

To help you perform your job, you may be provided use of **CNHI, LLC**'s Information Technology resources, which include but are not limited to company computers (hardware and software), e-mail, instant messaging, voice mail, fax machines, the Internet, **CNHI, LLC**-specific intranets, extranets and blog sites. Violations of **CNHI, LLC**'s Software, Hardware and Information Security Policy may result in disciplinary action, up to and including termination of employment.

### Acceptable Use

**CNHI, LLC**'s Information Technology resources are to be used solely for business purposes, including but not limited to creating, researching and processing company-related materials.

### Unacceptable Use

Use of **CNHI, LLC**'s Information Technology resources for non-business purposes is strictly prohibited. Examples of prohibited use include but are not limited to solicitation, office gossip, harassment of others, downloading of pornographic material, participation in e-mail spamming, transmission of material known to be infected with computer viruses, willful interruption or impeding of computer or telecommunications service.

### No Expectation Of Privacy

All **CNHI, LLC** Information Technology resources are the property of **CNHI, LLC**. Because these resources are intended only for business use, any data employees add, remove, access, or modify is also considered the property of **CNHI, LLC**. All data entered, created, transmitted, received or stored via **CNHI, LLC** Information Technology resources is subject to inspection, search and disclosure at any time in any manner deemed appropriate by **CNHI, LLC**, in its sole judgment. Employees have no expectation of privacy in connection with regard to the entry, creation, transmission, receipt or storage of data via **CNHI, LLC** Information Technology resources. This includes, but is not limited to e-mail communications, files or documents stored on a file server, or files or documents stored on local hard drives, diskettes, tapes or other electronic storage device used in **CNHI, LLC** equipment. Even though materials may be "deleted" from a system, a record of it may remain in backup or other ways, thus ultimate privacy of material is not assured to anyone. All communications, including text, images and sound, can be disclosed to law enforcement or other third parties without prior consent of the sender or the receiver.

### Software And Hardware

All hardware devices and software acquired for or on behalf of **CNHI, LLC** or developed by company employees or contract personnel on behalf of **CNHI, LLC** is and shall be deemed company property. All such hardware devices and software must be used in compliance with applicable licenses, notices, contracts, and agreements. Only software licensed to or owned by **CNHI, LLC** is to be installed on **CNHI, LLC** computers. Employees shall not install, copy, or download software unless authorized by **CNHI, LLC**. Unauthorized duplication of either proprietary or internally developed software is a violation of this policy, whether such duplication is for business or personal use.

All software and hardware purchased must follow the Information Technology standards set-forth by **CNHI, LLC**. Software and hardware must comply with applicable licenses, notices, contracts and agreements specifically for business use. At no time should software or hardware licensed for personal or home use be authorized.

## **Licensing And Compliance With Laws**

By using **CNHI, LLC**'s Information Technology resources, whether at work, through remote access, or on personal equipment, each employee assumes personal responsibility for following all applicable licenses, notices, contracts, and agreements related to **CNHI, LLC**'s Information Technology resources, as well as local, state, and federal laws and regulations. Any employee's failure to follow any license, notice, contract, or agreement, as well as local, state, or federal laws and regulations may subject him/her to liability as well as disciplinary action by **CNHI, LLC**, up to and including termination of employment.

## **The Internet**

Access to the Internet is provided to employees for the benefit of **CNHI, LLC**. Employees are only authorized to use the Internet in an effective, ethical and lawful manner, and for appropriate business reasons.

## **Passwords And Viruses**

Employees should take the necessary steps to ensure that their passwords are secure. Secure passwords should be a combination of upper and lower case letters, numbers and special characters. It is against policy to share passwords with other employees or non-employees on any systems that access **CNHI, LLC** company information.

If you suspect your password has been learned or used by others, you should change it immediately. All employees should log off or lock their accounts when physically away from their workstations. "Hackers," with or without your password, may be able to intercept your information. Employees shall not knowingly introduce a computer virus into company computers.

## **Remote Access And Use Of Personal Equipment**

**CNHI, LLC** may provide tools and equipment for remotely accessing the corporate computer network, including but not limited to computer hardware, software, phone lines, e-mail, instant messaging, voicemail, and/or connectivity to host applications and other applicable equipment as deemed necessary. The use of equipment and software provided by **CNHI, LLC** for remotely accessing **CNHI, LLC**'s computer network is limited to authorized persons and for purposes relating to company business. The Information Technology Department will only provide support for equipment and software provided by **CNHI, LLC**. At its discretion, **CNHI, LLC** will disallow remote access for any employee for any reason.

## 7.4 Electronic Media Policy

**CNHI, LLC** operates on a philosophy that coworkers and others should be treated with respect at all times, including on electronic media. Electronic media includes, but is not limited to, social networking websites (e.g., Facebook, Twitter, etc.), chat rooms, mailing lists, and web logs (“blogs”). While we support our employees’ use of electronic media as a vehicle for social and business networking, employees are prohibited from expressing their personal opinions that are maliciously false about **CNHI, LLC**, its directors, management, employees, volunteers, vendors, or members, either by name or by implication, using electronic media. Content placed on electronic media regarding **CNHI, LLC** or its directors, management, employees, volunteers, vendors, or members must be free of any impression that the views expressed are anything more than personal opinion; in other words, such content must make clear that it does not represent the views of **CNHI, LLC**. In addition, content placed on electronic media must not violate **CNHI, LLC**’s policies, which prohibit posting or displaying comments about coworkers, supervisors or the Company that are discriminatory, violent, vulgar, obscene, threatening, intimidating, harassing, slanderous or similarly unlawful and/or violate the Company’s Sexual and Other Harassment, Equal Employment Opportunity, and Violence in the Workplace Policies. Examples of such conduct includes offensive posts meant to intentionally harm someone’s reputation or posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion, or other status protected by law or Company policy. Employees must not post any information on or through electronic media that **CNHI, LLC** considers to be confidential, including but not limited to trade secrets, proprietary information, and all other non-public information and data of or about **CNHI, LLC** and its business. Trade secrets, proprietary information and non-public information and data about the Company includes information regarding the development of systems, processes, products or services, know-how, and technology. Moreover, employees’ use of electronic media should not interfere with work commitments or performance.

This policy does not, in any manner, prohibit employees from discussing among themselves or others wages, benefits, and other terms and conditions of employment or workplace matters of mutual concern that are protected by the National Labor Relations Act.

Employees learning of electronic media that is inconsistent with the requirements of this Policy must immediately contact Corporate Human Resources in Montgomery at (334) 293-5800 or (800) 951-2644. Violations of this policy may result in disciplinary action up to and including termination of employment.

## 7.5 Confidential Or Proprietary Information

Because of the nature of **CNHI, LLC**’s business, employees will often be exposed to many types of confidential or proprietary information. This includes information that is given to **CNHI, LLC** by its clients to permit **CNHI, LLC** to assist them in developing and executing their marketing plans, as well as client lists, financial information and records relating to the company’s business.. Misuse or unauthorized disclosure of confidential information not otherwise available to persons or firms outside **CNHI, LLC** is cause for disciplinary action, including termination of employment. Furthermore, it is the employee’s responsibility never to use such information for personal gain or benefit. Unauthorized use, access or disclosure of confidential or proprietary information will result in disciplinary action, up to and including termination of employment. The obligation to keep confidential and proprietary information confidential and secret applies after employment has ended.

## 7.6 Copyrighted Material

**CNHI, LLC** produces copyrighted material on a daily basis. Consequently, **CNHI, LLC** is sensitive to the rights and responsibilities associated with dealing with such material, whether produced by others or by us. It is a company policy that no copyrighted or otherwise protected material be shared, copied or used in any fashion or manner not specifically authorized by the owner of such material. This includes audio and video images, computer software and publications of any form or type, whether electronic or in “hard copy” form.

It is likely that you, as an employee of **CNHI, LLC**, will create a variety of copyrightable material related to **CNHI, LLC**’s business, functions, or operations. Because you are in **CNHI, LLC**’s employ and receive compensation from **CNHI, LLC**, **CNHI, LLC** is entitled to receive the benefit of, and the copyright(s) in, any such material that you create for, or on behalf of, **CNHI, LLC**. Any such materials are considered “works made for hire,” meaning that **CNHI, LLC**, and not the employee, is considered the author of the material and is the sole owner of the material and any copyright(s) in the material. This also means that only **CNHI, LLC**, and not the employee, may seek to register a copyright or copyrights in any material related to **CNHI, LLC**’s business, functions, or operations and created by an employee as part of his or her employment duties at **CNHI, LLC**, on behalf of **CNHI, LLC**, during the employee’s work hours, or using **CNHI, LLC** systems, equipment, or materials. If you develop any copyrightable material, you will be required to sign and deliver to **CNHI, LLC** any documents that may be necessary for the Company to apply for and obtain copyright protection for that material, including, if necessary, an assignment of any interest that you may have in the material. All such material, and any related documents or copyright registration applications, must be treated as confidential information, as discussed and defined in Sections 7.1 and 7.4 above.

## 7.7 Policy Concerning Inventions And Innovations

### Employee Inventions

Because you are in **CNHI, LLC**’s employ and receive compensation from **CNHI, LLC**, **CNHI, LLC** is entitled to receive the benefit of any inventions, discoveries, programs, ideas or innovations you develop and which pertain to **CNHI, LLC**’s business, functions or operations. You should understand that any of these items conceived or developed during your employment are the sole property of **CNHI, LLC**. This means that only **CNHI, LLC**, and not the employee, may apply for a patent or patents covering any inventions, discoveries, programs, ideas, or innovations related to **CNHI, LLC**’s business, functions or operations and created by an employee as part of his or her employment duties at **CNHI, LLC**, on behalf of **CNHI, LLC**, during the employee’s work hours, or using **CNHI, LLC** systems, equipment, or materials. If you conceive or develop an invention, discovery, program, idea or innovation while in **CNHI, LLC**’s employee, you will be required to sign and deliver to **CNHI, LLC** any documents that may be necessary for the Company to apply for and obtain patent protection, including, if necessary, an assignment of any interest that you may have in the invention, discovery, program, idea, or innovation. All such inventions, discoveries, programs, ideas, or innovations, and any related documents or patent applications, must be treated as confidential information, as discussed and defined in Sections 7.1 and 7.4 above.

## Non-Employee Inventions

It is the general policy of **CNHI, LLC** not to accept, review or consider ideas, suggestions, inventions or products from persons outside **CNHI, LLC**. Infrequently, however, **CNHI, LLC** does choose to evaluate submissions. In such cases, **CNHI, LLC** will do so only if the submitter has agreed in writing to specific terms and conditions for the submission.

There are specific procedures employees should follow when approached by someone with respect to an idea, suggestion, invention, product or product improvement. Specifically, in the event a non-employee contacts any **CNHI, LLC** employee concerning any idea, suggestion, invention, product or product improvement, he or she should immediately refer the individual to the Chief Operating Officer, who is responsible for handling the submission. No one other than the Chief Operating Officer should discuss the submission or make any comment about it, except to indicate that the Company has a policy that requires submission to the Chief Operating Officer. In particular, an employee should not open or examine materials accompanying the submission and no copies should be made of any such materials. All materials accompanying any such submission must be treated as confidential information, as discussed and defined in Sections 7.1 and 7.4 above.

## 7.8 Personnel Records

**CNHI, LLC** maintains written and electronic personnel records on all employees. Except as required by law, only authorized **CNHI, LLC** employees with a valid work-related reason may have access to and use of personnel records kept by **CNHI, LLC**. In order to ensure that payroll and benefit records contain current data, employees should notify their local Human Resources Coordinator of any changes in address, telephone number, number of dependents and similar items. Records about an individual that identify him or her by name may not be disclosed to people or organizations outside **CNHI, LLC** without the individual's permission except in response to legal process or for other appropriate reasons.

If third parties call to inquire about an employee's or former employee's employment, **CNHI, LLC** will provide the dates of employment and position held.

All records maintained by the Human Resources Department are the property of **CNHI, LLC**. If you ever have any questions regarding the accuracy or completeness of information contained in your personnel records, these should be brought to the attention of your supervisor or to the local Human Resources Coordinator. **CNHI, LLC** will evaluate any objections and correct or remove information that it determines to be erroneous. If the decision is made to retain the information in the file, you may place a brief statement in the record identifying the alleged errors or inaccuracies. No material may be removed by employees from the files or records of **CNHI, LLC**.

Medical information pertaining to employees is kept in a separate medical file in a secure location. Medical files are treated as confidential medical records and are not disclosed except that (a) supervisors and managers may be informed regarding necessary work restrictions and accommodations, (b) first aid and safety personnel may be informed, when appropriate, if the medical condition might require emergency medical treatment, and (c) as otherwise required by law.



## **7.9 Privacy Policy**

CNHI, LLC will comply with all applicable federal and state confidentiality, privacy and security laws.

## **7.10 Building Security**

All employees are responsible for assisting with building security. The exterior doors of the building should be locked each evening and remain locked overnight and through the weekend, consistent with local policy.

Visitors should not be allowed to wander unescorted through the building. Each visitor should remain in the lobby until the person being visited arrives and escorts the visitor into other sections of the building. Any unescorted or unknown individual should be escorted back to the lobby until the person to be visited is contacted.

## **7.11 Employee Safety**

CNHI, LLC is committed to a safe work environment. We all share in the responsibility for maintaining a safe workplace and conducting business in a way that minimizes risk to employees, guests and customers.

### **Safety Tips**

Slips and falls are one of the most frequent incidents in the workplace. Be aware of tripping hazards, such as telephone and electrical cords and items stored on the floor.

Misuse of furniture is another cause for concern. Using a chair as a stepping stool and leaning back in a chair can lead to incident or injury. If your chair or other equipment is in need of repair, contact your supervisor immediately. File cabinets and drawers should be kept closed when not in use.

Personal appliances such as fans, coffeemakers and heating coils should not be brought into the workplace. Use of such appliances requires advance approval of the building manager.

### **Reporting Accidents**

Commitment to safety does not eliminate accidents. In the event of an accident, including actual or potential injury and/or property damage, you must follow all accident and injury reporting procedures to ensure prompt handling of claim processing and correction of potentially unsafe conditions.

If an injury occurs, you must immediately report it to your supervisor or manager. If your supervisor or manager is not available, notify the Publisher, General Manager or Human Resources Coordinator. Your supervisor will be required to fill out a First Report of Injury Form.

## **Driver Safety**

Employees who drive **CNHI, LLC** owned or leased vehicles, or who drive their own vehicle more than once per month on company business are expected to comply with all safety precautions, and will be subject to the requirements of **CNHI, LLC's** Motor Vehicle Records (MVR) Policy. These requirements include, but are not limited to a satisfactory driving record, the maintenance of insurance coverage at or above the minimum levels required by each state and a valid driver's license. All moving violations or traffic accidents that occur while on company business must immediately be reported to the employee's manager. Failure to comply with **CNHI, LLC's** MVR Policy will result in disciplinary action up to and including termination of employment.

## **Chemicals In The Workplace**

It is important to understand the potential hazards, if any, of materials you use. Products have specific chemical data sheets called Safety Data Sheets (SDS), which are supplied by the manufacturer. The data sheets supplement label instructions and warnings.

As with any material or product, misuse has the potential for injury or illness; therefore, we ask you to read, understand and follow the product labels and warnings. If you cannot find instructions or labels, contact your supervisor for help. Any questions regarding the materials with which you work should be directed to your supervisor. If necessary, he or she can get additional technical support to answer the question.

## **7.12 Cell Phone Policy**

This policy outlines the safe and appropriate use of cellular phones and other wireless devices by Company personnel while operating a motor vehicle for Company business.

**CNHI, LLC** is committed to promoting the responsible use of cellular phones (and other wireless devices such as laptops and tablets) by its employees. Research shows that cell phone usage while driving a vehicle affects judgment regardless of the use of a "hand-held" or "hands-free" wireless device. Accordingly, the Company expects all personnel to drive responsibly at all times, including while conducting Company business.

Although no list of precautionary measures can guard against every dangerous situation or condition that may arise, the following are our guidelines that must be followed:

**CNHI, LLC** prohibits employee use of cellular phones and other wireless devices while operating a motor vehicle for Company business. This prohibition includes, but is not limited to, receiving or placing calls, text messaging, surfing the Internet, and responding to emails.

Always remember that the foremost responsibility of any driver is to be attentive to the road and exercise good judgment at all times.

Personnel who violate this policy will be subject to disciplinary action, up to and including termination of employment.

## 7.13 Workers' Compensation

It is the policy of **CNHI, LLC** to create and maintain safe, environmentally sound working conditions for all employees. Therefore, every **CNHI, LLC** employee has a responsibility to report to his or her supervisor any unsafe working condition. It is also the policy of **CNHI, LLC** to ensure that employees incurring injuries or illnesses in the course of their employment receive proper medical treatment and all related benefits as mandated by law. Workers' compensation benefits are intended to compensate job-related injuries or illnesses by reimbursing workers for loss of income and by paying for any medical and rehabilitation treatment necessary. Coverage is effective on the first day of employment. If you should be injured on the job, no matter how minor, you must report your accident to your supervisor immediately. Your supervisor must complete the First Report of Injury Form within 24 hours and submit it to the workers' compensation insurance carrier. Failure to promptly report an injury or illness covered by the policy may result in a loss or denial of benefits by the workers' compensation insurance carrier.

Should your physician certify that you are unable to return to work for any length of time, you may qualify for compensation under your state's workers' compensation law. **CNHI, LLC** has a separate insurance company that provides coverage for medical and other expenses incurred for workers' compensation claims. While you are receiving such compensation, your regular salary will not be paid. If an employee is out on leave at the end of the year and the leave of absence extends into a new calendar year, the employee will not be allowed to carry over any unused vacation or personal leave into the new year. In addition, the employee must work one day in the new calendar year to be eligible for the vacation, sick and personal leave that is normally granted at the beginning of the year.

If an employee is eligible for FMLA leave and worker's compensation leave, both types of leave run concurrently.

Finally, **CNHI, LLC** may elect to offer an employee a "light duty" position to facilitate an employee's return to work. The failure of an employee to accept such a position may jeopardize an employee's right to continue to receive workers' compensation benefits.

## 7.14 Violence In The Workplace

CNHI, LLC has a zero tolerance policy for violence in the workplace. It is CNHI, LLC's policy to provide a workplace that is safe and free from all threatening and intimidating conduct. Therefore, CNHI, LLC will not tolerate violence or threats of violence in any form in the workplace, at work related functions or outside of work if it affects the workplace. Casual remarks, jokes, horseplay or "unintentional" conduct will be taken seriously. This policy applies to all CNHI, LLC employees, clients, customers, guests, vendors and persons doing business with CNHI, LLC.

It will be a violation of this policy for any individual to engage in any conduct, verbal or physical, that intimidates, endangers or creates the perception of intent to harm persons or property. Conduct that falls under this Violence in the Workplace policy includes, but is not limited to:

- Physical assaults or threats of physical assault, whether made in person or by other means (e.g., in writing, e-mail, by phone or fax).
- Verbal conduct that is intimidating and has the purpose or effect of threatening the health or safety of a co-worker.
- Possession of firearms, knives or any other lethal weapon on company property, in a vehicle being used on company business, in any company owned or leased parking facility or at a work-related function (except as permitted by applicable state law).
- Any other conduct or acts management believes represent an imminent or potential danger to workplace safety/security.

Employees who have been threatened or intimidated, or who have witnessed or overheard conduct violating this policy should report it immediately to their supervisor, a member of management or Human Resources. **CNHI, LLC** will promptly investigate any reported occurrences or threats of violence. Violations of this policy will result in disciplinary action, up to and including termination of employment. Where such actions involve non-employees, **CNHI, LLC** will take action appropriate for the circumstances. Where appropriate and/or necessary, **CNHI, LLC** will take whatever legal actions are available and necessary to stop the conduct and protect **CNHI, LLC** employees and property.

**CNHI, LLC** will comply with all applicable federal, state and local laws as they relate to this policy.

## Section VIII:

# Employee Benefits



## 8.1 Benefits

Certain employees may be entitled to participate in Company 401(k), health insurance, life insurance and/or disability insurance plans after completing minimum service requirements. These benefits depend on the terms of the documents governing those plans, and no company official is authorized to provide you with terms different than those provided in the plans. A separate summary of these benefits will be made available to you in the **CNHI, LLC** summary plan descriptions. Each of those plans can be modified by **CNHI, LLC** at any time without prior notice. You may address any questions regarding **CNHI, LLC** benefit plans to your Human Resources Coordinator.

## 8.2 Break In Service

Subject to applicable plan criteria, if an employee terminates employment and is rehired within 30 days, it will be considered as though there was no break in service for purposes of determining benefit eligibility. For example, if a full-time employee of six years terminates employment and is rehired within three months, the employee will be eligible to participate in the benefit program immediately, and the annual vacation grant will remain at three weeks per year.

In the event an employee is rehired following a departure greater than three months, the waiting period for benefit eligibility will be the same as a new hire with the exception of the 401(k) plan.



## Section IX:

# If You Leave



## 9.1 Termination of Employment

### Giving Notice

While you or **CNHI, LLC** have the right to terminate employment at any time, we request that you give two weeks prior notice. Any notice periods of more than four weeks must be approved by the **CNHI, LLC** corporate office.

### Exit Interview

**CNHI, LLC** is interested in your feedback. In the event that your employment with us terminates, your Human Resources Coordinator may contact you to schedule an exit interview or make other arrangements to get your feedback.

### Company Property

During your exit interview or on your last day of employment you will be asked to return all company property including equipment, records, credit cards, keys, files, account lists or other assets in your possession.

If an employee refuses to return all **CNHI, LLC** property or assets in his or her possession upon his or her termination, **CNHI, LLC** will pursue available legal remedies.

