

CONNECTICUT SUPPLEMENT

I. SEXUAL HARASSMENT (ADDENDUM TO ANTI-DISCRIMINATION, NON-HARASSMENT & RETALIATION PREVENTION POLICY)

Sexual harassment is illegal and prohibited by Connecticut and federal law in the workplace, pursuant to § 46a-60(a)(8) of the Connecticut General Statutes and Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e et seq.

While employees are encouraged to report claims internally, if an employee believes that they have been subjected to sexual harassment, the employee may file a formal complaint with the Connecticut Commission on Human Rights and Opportunities (the "Commission") at 860-541-3400, CT Toll Free 1-800-477-5737, or online at www.ct.gov/CHRO.

Individuals who engage in acts of sexual harassment may be subject to civil penalties and other remedies in the form of a cease and desist orders, back pay, compensatory damages, hiring, promotion or reinstatement, emotional distress damages, as well as attorney's fees, costs, pre- and post- judgment interest and punitive damages (if the case is tried in court). Individuals may also be subject to additional criminal penalties stemming from acts of sexual harassment.

Connecticut law requires that a written complaint be filed with the Commission within 300 days of the date the alleged harassment.

II. PREGNANCY ACCOMMODATIONS

In compliance with Connecticut law, the Company will not discriminate against an employee or prospective employee in the terms or conditions of the employee's employment in relation to pregnancy, childbirth or a related condition including, but not limited to, lactation. The Company will not limit, segregate or classify an employee in a way that would deprive the employee of employment opportunities due to the employee's pregnancy.

The Company will endeavor to provide reasonable accommodations for conditions related to pregnancy, childbirth or a related condition, including, but not limited to, lactation, unless the accommodation would pose an undue hardship on the Company's business. Such accommodations include, but are not limited to: being permitted to sit while working, more frequent or longer breaks, periodic rest, assistance with manual labor, job restructuring, light duty assignments, modified work schedules, temporary transfers to less strenuous or hazardous work, time off to recover from childbirth or break time and appropriate facilities for expressing breast milk.

The Company will not force an employee or prospective employee affected by pregnancy to accept a reasonable accommodation if such employee or person seeking employment does not have a known limitation related to the employee's pregnancy, or does not require a reasonable accommodation to perform the essential duties related to the employee's employment. This includes, but is not limited to, forcing an employee to take leave if another reasonable accommodation can be provided to an employee's condition related to the pregnancy, childbirth, or a related medical condition.

The Company will not retaliate against an employee in the terms, conditions or privileges of the employee's employment based upon such employee's request for a reasonable accommodation under this policy. Further, the Company will not deny employment opportunities to an employee or prospective employee due to an employee's or prospective employee's request for a reasonable accommodation related to pregnancy, childbirth, or a related medical condition.

If employees have any questions about or would like to request a reasonable accommodation pursuant to this policy, they should contact Human Resources.

III. LEAVE FOR FAMILY VIOLENCE, DOMESTIC VIOLENCE OR SEXUAL ASSAULT

Employees who are victims of family violence, domestic violence or sexual assault are allowed at least twelve (12) days of unpaid leave during any calendar year for a qualifying purpose. An employee also may be eligible for reasonable unpaid leave if the employee's child is the victim of domestic violence. "Family violence" includes incidents resulting in physical harm, bodily injury, assault, or an act of threatened violence between family or household members. "Domestic violence" includes family violence, as well as stalking, threatening or intimidation, or coercive control. "Sexual assault" includes any act of sexual violence, such as forced or non-consensual sexual intercourse or sexual contact, or any other act constituting sexual assault under applicable state law, regardless of the perpetrator's status as a family or household member.

The purpose of a qualifying leave should be to:

- 1) Seek medical care or counseling for injury or disability as a result of family violence, domestic violence (including for a child who is a victim of domestic violence, provided the employee is not the perpetrator of the domestic violence against the child) or sexual assault;
- 2) Obtain services from a victim services organization;
- 3) Obtain psychological counseling related to an incident(s) of family violence, domestic violence (including for a child who is a victim of domestic violence, provided the employee is not the perpetrator of the domestic violence against the child) or sexual assault;
- 4) Take action to increase safety from future incidents of domestic violence, including temporary or permanent relocation; or
- 5) Obtain legal services, assist in the prosecution of the offense, or otherwise participate in any civil or criminal proceeding related to or resulting from such family violence, domestic

violence or sexual assault.

Employees are not paid while on leave, but may use any accrued and unused paid time off time in connection with use of this leave. To the extent practicable, employees must provide reasonable (preferably seven (7) days) notice to request leave.

Employees may be required provide one of the following documents in connection with their use of leave, except when concurrently using paid sick leave provided under the Connecticut Paid Sick Leave law: a signed, written statement certifying that the leave is a result of an incident of family violence, domestic violence or sexual assault; a police or court record related to the incident of family violence, domestic violence or sexual assault; or a signed, written statement that the employee is a victim of family violence, domestic violence or sexual assault from an employee or agent of a victim services organization, an attorney, an employee of the office of victim services or victim advocate, or a medical professional or other professional from whom the employee has sought assistance concerning the incident of family violence, domestic violence or sexual assault. The Company will make every attempt to ensure documents provided in support of a leave request under this policy remain confidential and protected from disclosure unless required by law.

Note: Eligible employees may apply to the Connecticut Paid Leave Authority for Paid Leave benefits for otherwise unpaid family violence or sexual assault leave under this policy (up to 12 days).

IV. PAID FAMILY AND MEDICAL LEAVE BENEFITS

The Paid Family and Medical Leave Act is a mandatory statewide insurance program administered by the state-created Paid Leave Authority. Employees may be eligible for Connecticut Paid Family and Medical Leave ("CPL") income replacement benefits. Benefits are financed through employee contributions to the program. The Authority is solely responsible for determining whether an employee is eligible for benefits and the amount of any benefits payable.

It is the employee's responsibility to apply for CPL benefits and to cooperate in the CPL application process. It is also the employee's responsibility to immediately provide the Company with the Employer Verification form upon receipt of this form from the Authority. The form must be sent to Human Resources via email. The employee must also provide Human Resources with confirmation of 1) the application for benefits and 2) the approval of benefits and amount to be received.

Receipt of CPL benefits does not, by itself, provide job-protection to employees. For an employee to be considered for job-protected leave, they must follow the process for requesting Federal FMLA/CFMLA or other job-protected leave. CPL benefit periods may run concurrently with Federal FMLA/CFMLA or other leaves.

Eligibility. To be eligible for CPL benefits, an employee of a private employer must have

earned at least \$2,325 during one of the first 4 of the 5 most recently completed quarters and be presently employed or employed in the previous 12 weeks. The amount of paid benefits will vary depending upon the employee's wages, and the maximum available benefit is capped at 60 times the state minimum wage. For additional information, please visit <https://ctpaidleave.org>.

Amount of Benefits. Employees are eligible for up to 12 weeks of CPL benefits in a rolling 12-month "lookback" period, with an additional 2 weeks of CPL benefits available for a serious health condition resulting in incapacitation that occurs during a pregnancy. If benefits are to care for an injured servicemember, then up to 12 weeks of CPL benefits are available, notwithstanding any additional approved leave for this reason. Up to 12 days of CPL benefits are available for otherwise unpaid family violence or sexual assault leave pursuant to Conn. Gen. Stat. Sec. 31-51ss.

Covered reasons. Employees may apply for CPL benefits for:

1. The employee's own serious health condition;
2. To care for the employee's child after birth or placement for adoption or foster care;
3. To care for the serious health condition of the employee's child, spouse, parent (including in-law), sibling, grandparent, grandchild, or any other individual related to the employee by blood or affinity whose close association the employee shows to be the equivalent of these family relationships;
4. To serve as an organ or bone marrow donor;
5. For any qualifying exigency;
6. To care for an injured servicemember;
7. For otherwise unpaid family violence or sexual assault leave pursuant to Conn. Gen. Stat. Sec. 31-51ss.

Interaction with Other Paid Benefits. If an employee needs time away from work for a reason covered by CPL benefits, they may not be eligible to use any Company-provided paid benefits unless they apply for benefits from the Paid Leave Authority, including providing all required information to the Paid Leave Authority in connection with the application, to the extent Company-provided paid benefits require application for statutory benefits as a condition of receipt of the Company-provided paid benefits. This includes eligibility to use Company-provided benefits to supplement CPL benefits up to 100% of the employee's regular pay. The Company may require the employee to provide proof of application and/or approval for CPL benefits.

If an employee has applied to the Paid Leave Authority to receive CPL benefits and such application is denied, the employee may be required to use accrued paid time off for the applicable time period (unless the period of time is covered by CFMLA and the employee has two weeks or fewer of paid time off remaining).

Regardless of any remaining available Company-provided benefits, employees who are unable to demonstrate entitlement to job protection for their time away from work may be subject to disciplinary action under the Company's attendance policy.

Unlawful Acts. It is unlawful to retaliate against an employee who applies for CPL benefits.

V. CONNECTICUT FAMILY AND MEDICAL LEAVE POLICY (ADDENDUM TO FMLA POLICY)

Like the Family and Medical Leave Act ("FMLA") Policy described elsewhere in this Manual, the Connecticut Family and Medical Leave Act ("CFMLA") may require employers to provide family and medical leaves of absence for eligible employees. Either or both of these laws may apply to a leave. This policy will be interpreted to comply with the law(s) that apply to a particular leave. To the extent that state law mandates additional protection for pregnant employees, this policy also will be interpreted consistently with such requirements. This policy provides employees information concerning any CFMLA entitlements and obligations that differ from the FMLA entitlements and obligations that are set forth elsewhere in this Manual. If employees have any questions concerning CFMLA leave, they should contact Human Resources.

Eligibility. Employees may be eligible for leave under CFMLA if they have been employed by the Company for at least three (3) months immediately preceding the date the CFMLA leave will commence pursuant to the employee's request for leave.

Basic Family and Medical Leave Entitlement. The FMLA provides eligible employees up to twelve (12) workweeks of unpaid leave for certain family and medical reasons during a 12-month period. Under the CFMLA, an eligible employee may take up to twelve (12) weeks of unpaid leave within a 12-month period, with an additional two (2) weeks available for an incapacitating serious health condition that occurs during pregnancy. The 12-month period is measured by a "rolling" twelve (12) month period dating back from the time the employee requests leave. Where both laws apply, the leave provided by each will run concurrently.

In addition to the entitlements outlined in the FMLA policy, the CFMLA provides leave to care for (as each of these terms is defined by the law) an employee's parent-in-law, sibling, grandparent, grandchild, or any other individual related to the employee by blood or affinity whose close association the employee shows to be the equivalent of these family relationships (or of a child, parent, or spouse). The CFMLA also provides leave to serve as an organ or bone marrow donor.

For purposes of CFMLA leave with regard to leave to care for the serious health condition of a family member, "son or daughter" means a biological, adopted or foster child, stepchild, legal ward, or, in the alternative, a child of a person standing in loco parentis, or an individual to whom the employee stood in loco parentis when the individual was a child. "Grandchild" means a grandchild related to a person by blood, marriage, adoption by a child of the grandparent, or foster care by a child of the grandparent. "Grandparent" means a grandparent related to a person by blood, marriage, adoption of a minor child by a child of the grandparent, or foster care by a child of the grandparent. "Parent" means a biological parent, foster parent, adoptive parent, stepparent, parent-in-law or legal guardian of an

eligible employee or an eligible employee's spouse, an individual standing in loco parentis to an eligible employee, or an individual who stood in loco parentis to the eligible employee when the employee was a child. "Sibling" means a brother or sister related to a person by blood, marriage, adoption by a parent of the person, or foster care placement.

Additional Military Family Leave Entitlement (Injured Servicemember Leave). In addition to the basic FMLA and CFMLA leave entitlements, an eligible employee who is the spouse, son, daughter, parent or next of kin (as these relationships are defined by each law) of a covered servicemember is entitled to take up twenty-six (26) weeks of leave during a single 12-month period to care for the servicemember with a serious injury or illness. For purposes of Injured Servicemember Leave under the CFMLA, "next of kin" means the armed forces member's nearest blood relative, other than the covered armed forces member's spouse, parent, son or daughter, in the following order of priority: Blood relatives who have been granted legal custody of the armed forces member by court decree or statutory provisions, brothers and sisters, grandparents, aunts and uncles, and first cousins, unless the covered armed forces member has specifically designated in writing another blood relative as his or her nearest blood relative or any other individual whose close association with the employee is the equivalent of a family member for purposes of military caregiver leave, in which case the designated individual shall be deemed to be the covered armed forces member's next of kin; and "son or daughter" means a biological, adopted or foster child, stepchild, legal ward or child for whom the eligible employee or armed forces member stood in loco parentis and who is any age.

Leave to care for a servicemember is only available during a single 12-month period and, when combined with other FMLA- or CFMLA-qualifying leave, may not exceed twenty-six (26) weeks during the single 12-month period. The single 12-month period begins on the first day an eligible employee takes leave to care for the injured servicemember.

Substitute Paid Leave for Unpaid FMLA and CFMLA Leave. Employees generally must use any accrued paid time off while taking unpaid FMLA and/or CFMLA leave, except employees will not be required to use any paid time off during CFMLA leave to the extent it would result in a balance of less than two weeks of paid time off. The substitution of paid time for unpaid FMLA and/or CFMLA leave time does not extend the length of FMLA and/or CFMLA leaves and the paid time will run concurrently with an employee's FMLA and/or CFMLA entitlement.

Protection of Group Health Insurance and Other Benefits. If an employee is only taking CFMLA leave, the continuation requirements for group health plans under the FMLA are not applicable to group health plans covered under ERISA. Therefore, an employee who is on CFMLA leave but not FMLA likely will trigger COBRA requirements due to a reduction in hours worked.

Return to Work/Fitness for Duty Medical Certifications. All employees returning to work from family and medical leaves that were taken because of their own serious health conditions that made them unable to perform their jobs must provide the company with medical certification confirming they are able to return to work. The certification itself need

only be a simple statement of an employee's ability to return to work; however, the Company may provide the employee a list of the employee's essential job functions and may require the employee to provide the list to the health care provider in making the fitness-for-duty determination. Employees may obtain a Return to Work Medical Certification Form from Human Resources. The Company may delay job restoration following leave, other than an intermittent leave under the CFMLA, until employees provide return to work/fitness for duty certifications.

At the end of a leave under the CFMLA, employees will be returned to their original job, unless that job is not available, in which case they will be returned to an equivalent position. There is no key employee exception under the CFMLA.

Unlawful Acts. It is unlawful to retaliate against an employee who requests to use or uses leave under the CFMLA or otherwise exercises rights under CFMLA or to interfere with, restrain or deny the exercise of any rights under CFMLA. It is also unlawful to discharge or discriminate against any person for opposing any practice made unlawful by CFMLA or for involvement in any proceeding under or relating to CFMLA.

Enforcement. An employee may file a complaint with the Connecticut Department of Labor or may bring a private lawsuit against an employer.

VI. PRIVACY PROTECTION POLICY

Employees are permitted to access and use "personal information" only as necessary and appropriate for such persons to carry out their assigned tasks for the Company and in accordance with Company policy. "Personal information" means information capable of being associated with a particular individual through one or more identifiers, including, but not limited to, a Social Security number (SSN), a driver's license number, a state identification card number, an account number, a credit or debit card number, a passport number, an alien registration number or a health insurance identification number, and does not include publicly available information that is lawfully made available to the general public from federal, state or local government records or widely distributed media. Accessing and using such information without authorization by the Company or contrary to the Company's policies and procedures can result in discipline up to and including termination of employment. Employees who come into contact with SSNs or other sensitive personal information without authorization from the Company or under circumstances outside of their assigned tasks may not use or disclose the information further, but must contact Human Resources to turn over all copies of the information in whatever form.

For more information about whether and under what circumstances employees may have access to this information, employees may review their job description or contact Human Resources.