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VISION AND VALUES

EPS Corporation is committed to providing diverse, cost effective, high quality contract services to our customers and meeting and exceeding expectations as set forth in our contractual obligations. We are committed to upholding a reputation of being courteous, knowledgeable and responsible.

At EPS we value diversity, teamwork, respect and loyalty. We display courtesy and respect to customers, fellow contractors and fellow employees.

Each member of EPS is part of the Company’s overall success. Every employee is valued for his or her contribution.

Every person stands for quality, teamwork and success.

Welcome to EPS, where the power is in the people.
It is EPS policy to ensure that all employees and applicants for employment are treated without regard to their race, color, religion, national origin, age, gender, sexual orientation, disability, genetic information, marital status, veteran status or other characteristics unrelated to a person’s qualifications and/or job performance. All decisions regarding employment and all other personnel actions are made or administered in accordance with these principles. EPS will take positive action to affirmatively implement this policy and to guarantee continued adherence to the objectives of this policy in all areas of employment including, but not limited to, the following:

Employment, upgrading, demotion or transfer, recruitment or recruitment advertising, layoff or termination, rates of pay, benefits, other forms of compensation, and selection for training.

This policy of EPS is consistent with the requirements of, and objectives set forth in, the various statutes, regulations and executive orders relating to equal employment opportunity and affirmative action.
REASONABLE ACCOMMODATION POLICY

Purpose

The Americans with Disabilities Act (ADA) and the Americans with Disabilities Amendments Act (ADAAA) are federal laws that require employers with 15 or more employees to not discriminate against applicants and individuals with disabilities and, when needed, to provide reasonable accommodations to applicants and employees who are qualified for a job, with or without reasonable accommodations, so that they may perform the essential job duties of the position.

It is the policy of EPS Corporation to comply with all federal and state laws concerning the employment of persons with disabilities and to act in accordance with regulations and guidance issued by the Equal Employment Opportunity Commission (EEOC). Furthermore, it is the company policy not to discriminate against qualified individuals with disabilities in regard to application procedures, hiring, advancement, discharge, compensation, training or other terms, conditions and privileges of employment.

Procedures

When an individual with a disability requests accommodation and can be reasonably accommodated without creating an undue hardship or causing a direct threat to workplace safety, he or she will be given the same consideration for employment as any other applicant. Applicants who pose a direct threat to the health, safety and well-being of themselves or others in the workplace when the threat cannot be eliminated by reasonable accommodation will not be hired.

EPS Corporation will reasonably accommodate qualified individuals with a disability so that they can perform the essential functions of a job unless doing so causes a direct threat to these individuals or others in the workplace and the threat cannot be eliminated by reasonable accommodation or if the accommodation creates an undue hardship to EPS. Contact human resources (HR) with any questions or requests for accommodation.

All employees are required to comply with the company’s safety standards. Current employees who pose a direct threat to the health or safety of themselves or other individuals in the workplace will be placed on leave until an organizational decision has been made in regard to the employee’s immediate employment situation.
Individuals who are currently using illegal drugs are excluded from coverage under the company ADA policy.

The HR department is responsible for implementing this policy, including the resolution of reasonable accommodation, safety/direct threat and undue hardship issues.

**Terms Used in This Policy**

As used in this ADA policy, the following terms have the indicated meaning:

- **Disability**: A physical or mental impairment that substantially limits one or more major life activities of the individual, a record of such an impairment, or being regarded as having such an impairment.

- **Major life activities**: Term includes caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating and working.

- **Major bodily functions**: Term includes physical or mental impairment such as any physiological disorder or condition, cosmetic disfigurement or anatomical loss affecting one or more body systems, such as neurological, musculoskeletal, special sense organs, respiratory (including speech organs), cardiovascular, reproductive, digestive, genitourinary, immune, circulatory, hemic, lymphatic, skin and endocrine. Also covered are any mental or psychological disorders, such as intellectual disability (formerly termed “mental retardation”), organic brain syndrome, emotional or mental illness and specific learning disabilities.

- **Substantially limiting**: In accordance with the ADAAA final regulations, the determination of whether an impairment substantially limits a major life activity requires an individualized assessment, and an impairment that is episodic or in remission may also meet the definition of disability if it would substantially limit a major life activity when active. Some examples of these types of impairments may include epilepsy, hypertension, asthma, diabetes, major depressive disorder, bipolar disorder and schizophrenia. An impairment, such as cancer that is in remission but that may possibly return in a substantially limiting form, is also considered a disability under EEOC final ADAAA regulations.
• Direct threat: A significant risk to the health, safety or well-being of individuals with disabilities or others when this risk cannot be eliminated by reasonable accommodation.

• Qualified individual: An individual who, with or without reasonable accommodation, can perform the essential functions of the employment position that such individual holds or desires.

• Reasonable accommodation: Includes any changes to the work environment and may include making existing facilities readily accessible to and usable by individuals with disabilities, job restructuring, part-time or modified work schedules, telecommuting, reassignment to a vacant position, acquisition or modification of equipment or devices, appropriate adjustment or modifications of examinations, training materials or policies, the provision of qualified readers or interpreters, and other similar accommodations for individuals with disabilities.

• Undue hardship: An action requiring significant difficulty or expense by the employer. In determining whether an accommodation would impose an undue hardship on a covered entity, factors to be considered include:
  
  o The nature and cost of the accommodation.
  
  o The overall financial resources of the facility or facilities involved in the provision of the reasonable accommodation, the number of persons employed at such facility, the effect on expenses and resources, or the impact of such accommodation on the operation of the facility.
  
  o The overall financial resources of the employer; the size, number, type and location of facilities.
  
  o The type of operations of the company, including the composition, structure and functions of the workforce; administrative or fiscal relationship of the particular facility involved in making the accommodation to the employer.

• Essential functions of the job: Term refers to those job activities that are determined by the employer to be essential or core to performing the job; these functions cannot be modified.

The examples provided in the above terms are not meant to be all-inclusive and should not be construed as such. They are not the only conditions that are considered
to be disabilities, impairments or reasonable accommodations covered by the ADA/ADAAA policy.
ORIENTATION PERIOD

All employees, including rehired employees, shall serve an orientation period of 90 days in order to determine their suitability for continued employment.

Procedures
The orientation period commences on the first day of employment, and continues for ninety calendar days.

Employees shall not accrue Paid Time Off (PTO) benefits during this period. However, upon successful completion of the orientation period, the employee shall accrue PTO benefits for the hours worked during the orientation. Prior to the conclusion of the 90-day orientation period, management may complete a 90-Day Performance Review Form.
Medical examination and screening of employment applicants may be required prior
to employment to confirm the employee's physical ability to perform the essential
functions of the job.
HOURS OF WORK

Employee work schedules shall be designed to meet the needs of EPS, and shall conform to all applicable State and Federal regulations.

Definitions

Workweek
A workweek is seven consecutive days beginning 12:01 a.m. (local time) Monday. However, a standard workweek shall consist of 40 hours, and will run concurrently from Monday through Friday, or as designated for a specific project, such as Wednesday through Sunday.

Workday
A workday is eight working hours within a 24-hour day starting at 12:01 a.m. The normal workday starts at 8:00 a.m. with specific work schedules established as the requirement dictates.
PAYROLL PROCEDURES

Unless otherwise dictated by state law, employee net earnings are deposited into a financial institution selected by the employee as payment for services rendered. Earnings/deduction statements are delivered electronically to all employees by the designated pay date.

General Information
Payroll is on a bi-weekly cycle. Pay periods run from Monday through Sunday. Payroll is paid 10 days after the last day (Sunday) of the pay cycle. There are 26 pay periods in a year.

If the Wednesday payday falls on a holiday, pay deposits will be made on the Tuesday before.

Unless an employee is assigned to a working state in which state law dictates otherwise, employees terminating employment for any reason will receive their final pay, including any accrued Paid Time Off, on the next scheduled pay date after their last day of work, less any outstanding monies owed to EPS (For example: relocation advances, insurance).

Withholding of Taxes
Income tax information in this section describes only provisions relating to EPS payroll procedures.

Withholding of taxes does not relieve employees of the responsibility for filing returns as required by laws. Employees working in a foreign country are subject to the income tax laws pertaining to US citizens working abroad.

Employee's Withholding Allowance Certificate (W-4)
Form W-4 certifies an employee’s tax withholding exemptions and residence. It should be signed and dated by the employee upon being hired or when instituting a change of any kind. Completion of Withholding Certificates is also required for certain states.

Federal, State and City Income Tax
The appropriate state and city income taxes are withheld from employees' earnings in compliance with the Internal Revenue Code and state laws. EPS follows a percentage method of withholding that is provided by the government, and the various states and localities.
**Federal Social Security (FICA)**

The Social Security Act requires employers to withhold taxes from employees' wages. EPS contributions are in compliance with Federal law.

Each employee must have a social security account number as evidenced by an account card issued by the Social Security Administration.

**Unemployment Compensation - Disability Benefits Contribution**

In compliance with the applicable state laws governing unemployment-disability insurance, EPS makes deductions from the pay of employees for this purpose. EPS also contributes funds at a rate that changes with the stability of its work force.

**Other Payroll Deductions**

1. Medical, dental, or vision coverage, if elected by the employee.
2. 401(k) Savings Plan, as designated by the employee.
3. FSA – Flexible Spending Account as designated by the employee.
4. Volunteer Group Life Insurance, as designated by the employee in the Employee Benefits Summary.
5. Other Voluntary insurance plans (i.e. AFLAC)

Rates and the amount of contribution pertaining to the above are outlined in the Employee Benefits Summary.

**End of the Year Tax Statements**

On or prior to January 31, EPS distributes a W-2 Form which is a Wage and Tax Statement, to all employees that performed work in the previous year.

**Garnishment of Employee Wages**

For the purpose of this policy, a garnishment includes any court-ordered legal process, including notice of writ of attachment, execution, levy, or order to withhold, by which unpaid creditors, tax authorities, and other parties may reach a debtor employee's earnings and other assets in possession of EPS.

All employees shall strive to preclude the necessity for service of legal process against them or EPS.
When EPS is served with legal process, Human Resources or a member of the Payroll department will immediately notify the Chief Financial Officer and the employee.

An employee subject to legal process shall endeavor to obtain an official notice of satisfaction or release (from the responsible authority that issued the legal process) prior to the time of earnings deductions. If an official notice of satisfaction is not received, EPS will comply with the garnishment by withholding earnings.

**Exceptions**

Exceptions to policy matters related to payroll procedures require approval from the CEO or the Vice Chairman/President.
Submission of correct timesheets are imperative for timely payment to occur. Employees must review and adhere to the following guidelines or the payment process may be delayed.

**TIMESHEETS**

EPS Corporation utilizes an electronic timesheet system to track time worked for payment and billing purposes. EPS is currently using COSTPOINT Time & Expense module for time collection.

**DCAA Requirements**

EPS prepares billings for contracts from the time records of employees. Inaccuracies in such records could lead to inaccuracies in billing. Fraudulent entries could be deemed violations of federal law, resulting in civil and criminal penalties.

In accordance with the DCAA, EPS Corporation employees must follow these procedures when recording and submitting timesheets:

- Timesheets must be completed on a daily basis, preferably at the end of the workday.
- Employees must personally record time. Employees are prohibited from recording time for someone other than themselves. To do so may be considered fraud.
- Employees must record all hours worked, whether regular or overtime
- Employees are responsible for understanding which charge numbers and labor categories relate to the work being performed.
- All direct job task charge numbers and labor categories should be obtained from an employee’s project manager or supervisor
- When multiple tasks are worked in a single day, time must be recorded for each project
- Round hours to the nearest ¼ hour. (i.e. 1 hour 15 minutes would be recorded as 1:15)
- Timesheet may be submitted in advance if any employee knows he/she will be on vacation during the pay period.
COSTPOINT

In addition to the above DCAA requirements the following procedures apply when utilizing COSTPOINT Time and Expense module for time collection:

- Employees will only be able to select project codes to which they have been assigned.

- Hours must be entered and saved at the end of the workday on a daily basis.

- Each employee must complete and sign his/her own timesheet for approval at the end of each week.

- By signing the timesheet the employee certifies that the information is accurate and complete.

- The Timecard approver can view and approve hours only after the timecard is saved.

- If an error is discovered after a timecard has been submitted, the approval will decline signoff and return timecard for corrections and to resubmit for approval.

- Editing entries requires an explanation in the comments field.
Costpoint Training Guide:
Employee Training Manual

Electronic Timekeeping
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Resetting a Password and Unlocking Your Account: .......................................................................... 37
Welcome:

Welcome to Deltek’s Costpoint Time & Expense – Time Collection training!

We want you to be able to fill out your timesheet as easily as possible. Accurate timesheets are critical because they affect everything we do, from tracking progress and managing contracts, to invoicing, cash flow, and staying in business. Timesheet data must be accurate as it flows into all modules of the corporate-wide system. Each time you submit your timesheet, you are “certifying that hours were incurred on the charge and day specified in accordance with company policies and procedures”.
Activating Your Account:

Upon receiving the activation e-mail from Deltek, follow the instructions included in the email to access the activation website and activate your account.

- The e-mail will include the link to Deltek’s account activation website
- Upon accessing the link, enter the username and temporary password from your email into the upper left part of the page and follow the instructions to create your security questions and permanent password. (Copying and pasting the temporary password does not work, please type in the information manually)

Note1: If you receive a page error message, please try completing this step using an alternate browser, such as Firefox. The site has some compatibility issues with certain versions of Internet Explorer, and Safari, so depending on which version of the software you are using, you may come across this issue.

Note2: Passwords are case sensitive. Upon entering an incorrect password 3 times, your account will automatically lock. You will need to contact EPS Human Resource or Payroll department to unlock your account. Please use one of the following emails to request that your account be unlocked – HR@epscorp.com or Payroll@epscorp.com.

Upon successful activation, please proceed to your web portal by following the steps below. Please do not attempt to access the portal or the timesheet system prior to successfully activating your account.
Password Requirements:

- Passwords may not contain the user’s account name or two consecutive characters that spell parts of the user’s full name
- Passwords must be at least eight characters in length
- The last 10 passwords cannot be re-used
- Passwords must contain characters from three of the following four categories:
  - English uppercase characters (A through Z)
  - English lowercase characters (a through z)
  - Base 10 digits (0 through 9)
  - Non-alphabetic characters (for example, !, $, #, %)
- Passwords are active for 90 days. Two weeks prior to expiration, users will receive an auto-generated email prompting a password change
Accessing the Portal:

First double click on the Internet Browser Icon or another web browser.

In the address line, enter the following path:
https://www.costpointfoundations.com/epscorp/portal.html

Please add this as a bookmark on your browser. Clicking on your employee home page Time / Expense “GO” button will also lead you to this site. (This option will be effective on Jun 5th)

Welcome EPS Employees

- [Go] Atlas Travel
- [Go] Employee Login
- [Go] Office 365
- [Go] FS Email
- [Go] Time / Expense
Logging into Time Collection:

Click on “Enter your Timesheet or Expense Report”.

![Diagram showing menu options for Employees, Project Managers, Accounting, Procurement, Materials, HR, and Customer Care.](image)
Enter your credentials, system and click “Log In”. Note that your username and system are NOT case-sensitive. Your password IS case-sensitive.

Username: Employee ID (This number has been provided on your email direction)
Password: Password created by user
System: EPSCORPTEST

**PLEASE NOTE, THE TEST SUFFIX WILL BE REMOVED AFTER YOUR FIRST 45 DAYS (A REMINDER EMAIL WILL BE SENT)**

Note1: The activation e-mail from Deltek will include your correct username and it should be entered in the screen above.

Note2: Make sure you enter the password you created during your account activation. Do not attempt to log into the timekeeping system using the temporary password provided by Deltek. That password should be exclusively used to activate your account.
Becoming Familiar with the Timesheet Screen:

- Depending on your job functionality, you may see additional or less modules
- All users will see Time & Expense
- To Navigate to your Timesheet, select “Time”, “Timesheets”, and “Manage Timesheets”
Users can use the browse bar, Browse Applications, to pull up timesheets
Global Toolbar in T&E:

Note: full descriptions available in the getting started guide

Split Buttons: Several of the toolbar actions have split buttons. They are indicated by the down arrow next to a given toolbar icon. Click on the down arrow to receive additional options for this action.
Entering a Timesheet:

Next, we will break the above screen into sections to better explain each area.
- **Query:** Select the Query option to open a specific timesheet
- **Save:** Select the Save option to save the changes made to your timesheet
- **Arrows:** Use the arrows to move between timesheet weeks
- **Employee:** Non-editable field displays your last name, first name, and middle initial (if supplied) as submitted to your human resources department
- **Class:** Non-editable field dictates the business rules that will be in effect during timesheet entry for the class that is assigned to you
- **Status:** Non-editable field displays the status of the current timesheet.
  - **MISSING:** Timesheet has not been started
  - **OPEN:** Timesheet is in progress and has not been signed by the employee or approved by the employees’ manager
  - **SIGNED:** Employee has completed the signing process
  - **APPROVED:** Employees’ manager has completed approval process
  - **PROCESSED:** Timesheet has been electronically sent to the company’s accounting system
  - **REJECTED:** Timesheet has been rejected during processing. This status usually means that the data on the timesheet is not correct as it stands
- **Timesheet Schedule Period Ending:** This non-editable field displays the period ending date, based on the company's timesheet schedules and the schedule that is assigned to you
- **Revision:** The revision will display as "1" for a new timesheet. The revision number increase automatically by one every time you save auditable changes
- **Sign:** Employees’ electronic signature upon completion of timesheet
- **Approve:** Manager electronic signature of approval of employee timesheet
- **Reject:** Manager rejection of employee timesheet
Data Entry Grid:

- **Project:** Look up the charge number to be used for the timesheet period
  - To look up the charge number, click on the magnifying glass under the account column and a new dialog box will open
- **Description:** Defaults based on the Charge Number that is entered
- **PLC:** Your project labor category (PLC) is optional, and not required (this field will automatically populate if it is applicable)
- **Pay Type:** This will default to “R”; if you work overtime you may be required to change this value
- **Charge Lookup:** In the charge lookup box, you have the option to drill down each category by clicking on the “+” next to each line until you find the correct indirect or direct charge code. (Next page)
Charge Lookup:

By clicking on an individual charge, the next level, called the “Charge Branch,” will display only those tasks the employee has been assigned to charge by the contract workforce. All other tasks will not be visible.

Once the appropriate charge line has been selected, choose the “OKAY” button.
You can add charge codes to your favorites by checking the box next to a charge on your timesheet and clicking the “add line to favorites” button.
Adding Favorites into T&E:

If you would like the items in your Favorites list to automatically default when you first open a new timesheet, please do the following:

- Select Charge Favorites link located at the top of the timesheet lines
- Select the Load checkbox for the rows that you want automatically loaded
- Select Save and Continue once completed (reference ICONs listed on Page 11)

**NOTE:** If you believe you are missing a charge code that should be available to you or, if you see a direct charge code that should not be available to you, please contact your supervisor.
**Entering Hours:**

Hours are entered by day and by charge number. Please note the following:

- Hours can only be entered to the hundredth digit (i.e., 7.51)
- The thick line in the middle of the page is called a splitter bar and splits the timesheet into two sections. This bar may be moved either to the left or the right to show more of either screen
- Future hours can be entered for Holiday and Vacation ONLY

**Comments:** Comments may be entered on either a daily or weekly basis by clicking on the below icon in either the daily or line cell. Only appropriate comments should be entered into the comment box. This is to ensure that inappropriate comments will not carry through to invoices or billing documents that might eventually make their way to a client.
Saving your Timesheet:

- After you have entered your time for each day, you will need to save your timesheet
- Click on ‘Save’ in the upper left corner of the timesheet

Signing your Timesheet:

After the timesheet has been completed, it needs to be signed before it can be processed. Under your name there is a box that says “Sign” click this box to sign your timesheet

This dialog box will appear.

By signing this timesheet you are certifying that hours were incurred on the charge and day specified in accordance with company policies and procedures

After hitting “OK” your timesheet is electronically signed and the status of the timesheet will change to “SIGNED.”
Revision Explanations:

Any time you change a saved field in a timesheet or any field after it has been signed, you will be required to insert a revision explanation. 

Note that only appropriate comments should be entered into the comment box. This is to ensure that no inappropriate comments will carry through to invoices or billing documents that might eventually make their way to a customer.

Revision explanations allow managers and auditors the ability to review the reason for the timesheet change and can be viewed in the Audit Application. Revisions can be accessed by the employee or the manager by clicking on the Revision Audit link in the header menu. When accessed a screen appears and shows all revisions for that timesheet.
**Correcting Timesheets:**

**Making Changes Prior to Signing the Timesheet:**

Change values within timesheet
- A revision explanation will need to be entered
- Use appropriate Line Function features

**Making Changes to a Prior Timesheet That Has Been Processed:**

Verify that the timesheet period is open (contact your timesheet administrator if this closed)
- Open the specific timesheet
- Follow the same procedures for a current timesheet
- Employee electronic signature
- Manager electronic signature

*All adjustments that are processed through Electronic Time Collection are required to follow these procedures. Written adjustments will no longer be accepted by accounting.*
Resetting a Password and Unlocking Your Account:

If you need to reset your password or unlock your account, please click on the “Unlock Account or Reset Password” link located in the web portal. This will take you to Deltek’s account activation website.

- Click on the “Unlock Account or Reset Password” link and follow the instructions
- Resetting your password also unlocks your account
- Reminder: your password needs to be reset every 90 days
- You will receive an e-mail reminder from Deltek prompting you to do so
PAID TIME OFF (PTO)

Paid Time Off (PTO) provides eligible employees with paid time away from work that can be used for vacation, personal time, sickness, injury, or time off to care for dependents.

It is policy to recognize the positive effect that time off from work has on the health and personal welfare of employees. Consequently, we encourage all employees to make use of their accrued time.

Eligibility
PTO is accrued by regular full time employees as set forth in the Paragraph entitled “PTO Accrual” unless overridden by a PTO policy applicable to a contract to which an employee is assigned.

Part time employees who work regularly scheduled work weeks of 20 hours or more accrue PTO on a pro rata basis as set forth in the Paragraph entitled “PTO Accrual” unless overridden by a PTO policy applicable to a contract to which an employee is assigned.

Temporary employees are not eligible for PTO.

PTO Accrual
Unless overridden by a PTO policy applicable to a contract to which an employee is assigned, all regular, full time exempt and non-exempt employees accrue PTO from the beginning of employment, at a rate of 4.62 hours per pay period up to 120 hours (15 days) per year. On the employee's fifth anniversary date, PTO credits will accrue at the rate of 6.15 hours per pay period up to 160 hours (20 days) per year. On the employee’s twentieth anniversary date, PTO credits will accrue at the rate of 7.69 hours per pay period up to 200 hours (25 days) per year.

Part time employees working at least 20 hours per week will accrue time on a pro-rata basis per the following schedule: Part time employees working 20 – 29 hours per week will accrue 1.53 hours per pay period. Part time employees working 30 – 39 hours per week will accrue 2.31 hours per pay period.

Employees shall not accrue PTO benefits during the 90-day orientation period. However, upon successful completion of the orientation period, the employee shall accrue PTO benefits for the hours worked during the orientation period.

PTO accruals for carry over purposes may not exceed a cap limit of 80 hours. Employees may continue to accrue usable PTO time, however may not carry in excess of 80 hours from year to year.

PTO Payments
PTO pay will be at the employee's current base rate.
Employees will not be paid for PTO other than that which has been credited to their account. "Advanced" or "negative" PTO pay is not permitted, unless authorized first by the supervisor, the responsible Division President or Vice President/General Manager and the CFO or the Vice Chairman/President.

Employees are not eligible for “Unpaid Leave” until all hours in the PTO account have been exhausted.

When a designated holiday falls within an employee's scheduled PTO period, the employee will receive holiday pay for the holiday and will not be charged PTO. Employees must have a sufficient amount of PTO available in order to be in a pay status the day before and the day after the holiday. If the employee does not have enough PTO available for the day before and the day after the holiday, the employee will not receive holiday pay.

Requests for PTO are made by the employee, to the employee's immediate supervisor through the Time and Expense Collection System. Directions for requesting PTO are available in the section titled “Timecard Procedure”.

**Paid Time Off (PTO) Period**

Employees may take a single day off. However, annual vacations (PTO days) of a longer duration are encouraged.

Employees and their supervisors are to agree in advance on the dates an employee will be away from work in order to provide for minimum interruption of work schedules.

Employees failing to return from PTO within three workdays after the scheduled return date, without notifying EPS, will be deemed to have voluntarily resigned.

**Notification by employees**

Employees that require an unscheduled absence from work are required to notify management of their absence, of the estimated duration of the absence, and/or of any extensions to the estimated period of absence.

Management must be notified not later than 9 A.M. of the employee's workday. Failure to notify EPS within 24 hours from the beginning of such leave is grounds for suspension and/or termination.

If extended illness is anticipated, it is the responsibility of the employee to notify EPS for coordination of benefits, (if applicable), such as State Disability Benefits, and Long Term Disability Benefits.

**Termination of Employment**

Upon termination of regular full time employment, employees will receive, in their last scheduled paycheck, pay for all PTO time accrued.
Exceptions
Employees on TDY travel status must delineate between absences due to sickness or injury and vacation or personal leave and meet eligibility standards in order to receive per diem pay. Please refer to the paragraph entitled “Temporary Duty (TDY) Status – Per Diem while injured or ill” for additional information.

Temporary Duty (TDY) Status – Per Diem while injured or ill
Employees on TDY status are required to delineate between vacation and sick time. An employee that becomes ill or injured while on Temporary Duty (TDY) status and remains at the TDY site is eligible to be paid up to a maximum of two (2) days of Per Diem with the approval from the Site Chief/Team Leader. The Site Chief/Team Leader must complete the “TDY Illness or Injury Acknowledgment form” and submit it with the employees Travel and Expense Report (TER). Employees will not receive per diem for absences of less than two days without the Site Chief/Team Leaders certification.

Employee will not draw Per Diem if they depart the TDY location.

Any employee out of work for over two days will require a signed doctor’s note stating the reason for absences from duty (will not exceed 5 days per calendar year). Employees will not receive per diem for absences over two days without the signed doctor’s note.
HOLIDAYS

It is EPS policy to observe holidays and provide time off with pay to eligible employees.

**Eligibility**
All regular, full time employees, who work regularly scheduled workweeks of 40 hours per week, are eligible for holiday pay, providing they are in a pay status on the regular workday immediately preceding and following the holiday unless required otherwise by contract or applicable law. Pay status may be in the form of regular pay or Paid Time Off (PTO) pay. New full time employees are eligible for holidays from the first day of employment.

Part time employees who work regularly scheduled work weeks of 20 hours per week or more are eligible for holiday pay on a pro rata basis, provided they are in a pay status on their regular workday immediately preceding and following the holiday. Temporary employees are not eligible for holiday pay.

**Holiday Schedules**
The following are observed by EPS as paid holidays:

- New Year's Day
- Martin Luther King's Birthday
- Presidents' Day
- Memorial Day
- Independence Day
- Labor Day
- Columbus Day
- Veterans' Day
- Thanksgiving Day
- Christmas Day

Holidays occurring on a weekend are generally observed on the Friday proceeding a Saturday holiday, or on the Monday following a Sunday holiday.
INSURANCE

Unless a full-time or part-time employee is assigned to a contract with a different benefit package (if any), EPS offers comprehensive health, dental, and vision insurance plans to all regular full time employees and part-time employees working 30 or more hours per week. EPS also offers coverage for employees’ families (spouse and dependents) at various rates. EPS provides a contribution towards the health plan. These rates and an explanation of these benefits are available from Human Resources. Employees are to contact Human Resources to determine which, if any, benefits apply or are available.

Life Insurance, Accidental Death & Dismemberment, and Long Term Disability Insurance are offered to all regular full time employees and part-time employees working 30 or more hours per week, at no cost to the employee unless a full-time or part-time employee is assigned to a contract with a different benefit package (if any). Employees under the standard EPS plan may not opt out of these coverage’s. Additional voluntary life and accidental death and dismemberment coverage is also available at cost to the employee. These rates and an explanation of these benefits are also available from Human Resources.

EPS provides insurance coverage, as required under the Defense Base Act (DBA), as a means of compensating employees for death or injury while working on US Government contracts outside the US.

Please contact Human Resources to determine which (if any) benefits you are qualified to participate in.
LEAVE OF ABSENCE

EPS may grant leaves of absence where unusual and unavoidable circumstances require an employee's absence.

Eligibility
All regular full time employees who meet the requirements established below.

Guidelines
A leave of absence, with or without pay, is a privilege granted to accommodate special personal needs which require absence from work.

Leave of Absence with Pay

Funeral leave
A paid leave of absence may be granted due to a death in the employee's family as follows:

   a. A maximum of five days in the event of the death in the immediate family (spouse, children and parents).

   b. A maximum of three days in the event of the death of a family member (brothers, sisters and grandparents).

Leave of absence pay will be made at the employee's current base rate for no more than eight hours for each working day of absence.

Military Reserve Training
A maximum of ten working days per year may be granted for employees required to fulfill military reserve obligations. Such employees must submit a copy of their official orders to Human Resources.

Military pay replaces EPS compensation except in cases where military pay is less than EPS salary. In cases where military pay is less than EPS salary, for up to a maximum of ten working days per year, the employee's compensation will be the difference between the normal EPS base salary and the base salary (including quarters allowance) paid by the government, exclusive of travel and per diem. This must be substantiated by military pay records.

Extended military leave is further described in the paragraph entitled “Military Leave”. In addition, all employees requesting military leave must follow the
procedures as set forth in the paragraph entitled “Procedures for all Military Leave”.

**Snow Days**

Employees working in EPS facilities, who are unable to make it into the facility because of inclement weather, may elect to have the time off through use of accrued PTO, or time with-out pay if PTO is not available.

The snow day policy for employees working in Government provided facilities would be determined by the Project Manager.

**Jury Duty**

EPS provides that all regular full time employees will receive compensation for the difference between jury duty compensation and their current daily base pay for the first five days of jury service (or in accordance with applicable law, if different). Employees are only eligible to receive this compensation once per juror eligibility cycle which is determined by the applicable state or federal law. An employee absent for more than one full week, during which no work is performed, is not eligible for additional salary reimbursement.

Employees must provide their supervisor and Human Resources with a copy of the summons notice as soon as it is received. Employees may be asked to request a postponement if called during a busy period. EPS will provide additional documentation in this regard, if necessary, to obtain such postponement.

While serving on jury duty, you are expected to call in to your supervisor periodically to keep him or her apprised of your status.

The employee is required to provide verification of actual jury time served.

**Leave of Absence without Pay**

**Personal Leave of Absence**

An employee may be granted a leave of absence for personal reasons up to a maximum of 30 days, providing the absence has no detrimental effect upon the ability of EPS to meet work schedules or commitments to customers. An employee anticipating a leave of absence should refer to the section titled “Procedures”.

A personal leave of absence shall not be granted unless the employee has utilized all earned PTO time.
Extended Leave of Absence

In the event of an urgent need that requires absence from work for an extended period, an employee may be granted an extended leave of absence, which is a leave of absence exceeding 30 days. A request for extended leave of absence must be made by the employee sufficiently in advance of the beginning of the leave so that EPS may plan accordingly.

An extended leave of absence may be granted or denied at the sole discretion of EPS.

Factors to be considered in recommending extended leave of absence:

   a. Effect of the absence on present or anticipated needs of the business;
   b. Reasonableness of and necessity for the request;
   c. Intention to return to employment at the completion of the leave;
   d. Employee is certified re-employable by the supervisor;
   e. Prior leave time; frequency of leaves.

Family and Medical Leave (FMLA)

General Provisions

In accordance with applicable state and federal law, EPS will grant up to 12 weeks of family and medical leave during any 12-month period to eligible employees, in accordance with the Family and Medical Leave Act of 1993 (FMLA) and up to 26 weeks of leave in any 12-month period in compliance with the expansion of FMLA under The Support for Injured Service members Act of 2007. The leave may be paid, unpaid or a combination of paid and unpaid leave, depending on the circumstances of the leave and as specified in this policy.

The function of this policy is to provide employees with a general description of their FMLA rights. In the event of any conflict between this policy and the applicable law, employees will be afforded all rights required by law.

Eligibility

To qualify to take family or medical leave under this policy, the employee must meet all of the following conditions:

   1. The employee must have worked for the employer for 12 months or 52 weeks. The 12 months or 52 weeks need not have been consecutive. For eligibility purposes, an employee will be considered to have been employed for an entire
week even if the employee was on the payroll for only part of the week or if
the employee is on leave during the week.

2. The employee must have worked at least 1,250 hours during the 12-month
period immediately before the date when the leave is requested to commence. The principles established under the Fair Labor Standards Act (FLSA)
determine the number of hours worked by an employee. The FLSA does not
include time spent on paid or unpaid leave as hours worked. Consequently,
these hours of leave should not be counted in determining the 1,250 hours
eligibility test for an employee under FMLA.

3. The employee must work in an office or work site where 50 or more
employees are employed by the company within 75 miles of that office or
work site. The distance is to be calculated by using available transportation
by the most direct route.

**Type of Leave Covered**
To qualify under this policy, the employee must be taking leave for one of the
reasons listed below:

1) The birth of a child and in order to care for that child
2) The placement of a child for adoption or foster care and to care for the newly
placed child.
3) To care for a spouse, child or parent with a serious health condition.
4) The serious health condition (described below) of the employee

An employee may take leave because of a serious health condition that makes the
employee unable to perform the functions of the employee’s position.

A serious health condition is defined as a condition that requires inpatient care at a
hospital, hospice or residential medical care facility, including any period of
incapacity or any subsequent treatment in connection with such inpatient care or
condition that requires continuing care by a licensed health care provider.

This policy covers illnesses of a serious and long-term nature, resulting in recurring
or lengthy absences. Generally, a chronic or long-term health condition that would
result in a period of three consecutive days of incapacity with the first visit to the
health care provider within seven days of the onset of the incapacity and a second
visit within 30 days of the incapacity would be considered a serious health condition.
For chronic conditions requiring periodic health visits for treatment, such visits must
take place twice a year.
Employees with questions about what illnesses are covered under this FMLA policy are encouraged to consult with the HR Department.

EPS will require an employee to provide a doctor’s certification of the serious health condition. The certification process is outlined in the section titled “Certification for an Employee’s Serious Health Condition”.

If an employee takes Paid Time Off (PTO) for a condition that progresses into a serious health condition and the employee requests unpaid leave as provided under this policy, the company may designate all or some of the portion or related leave taken as leave under this policy, to the extent that the earlier leave meets the necessary qualifications.

5) Qualifying exigency leave for families with members of the National Guard or Reserves or of a regular component of the Armed Forces when the covered military member is on covered active duty or called to active duty.

An employee whose spouse, son, daughter or parent either has been notified of an impending call or order to covered active military duty or who is already on covered active duty may take up to 12 weeks of leave for reasons related to or affected by the family member’s call-up or service. The qualifying exigency must be one of the following:

1) Short-notice deployment
2) Military events and activities
3) Child care and school activities
4) Financial and legal arrangements
5) Counseling
6) Rest and recuperation
7) Post-deployment activities
8) Additional activities that arise out of active duty, provided that the employer and employee agree, including agreement on timing and duration of leave.

Eligible employees are entitled to FMLA leave to care for a current member of the Armed Forces, including a member of the National Guard or Reserves, or a member
of the Armed Forces, the National Guard or Reserves who is on the temporary
disability retired list, who has a serious injury or illness incurred in the line of duty
on active duty for which he or she is undergoing medical treatment, recuperation, or
therapy; or otherwise in outpatient status; or otherwise on the temporary disability
retired list. Eligible employees may not take leave under this provision to care for
former members of the Armed Forces, former members of the National Guard and
Reserves, and members on the permanent disability retired list.

In order to care for a covered service member, an eligible employee must be the
spouse, son, daughter, parent, or next of kin of a covered service member.

a) A “son or daughter of a covered service member” means the covered service
member’s biological, adopted, or foster child, stepchild, legal ward, or a child
for whom the covered service member stood in loco parentis, and who is of
any age.

b) A “parent of a covered service member” means the covered service member’s
biological, adoptive, step or foster father or mother, or any other individual
who stood in loco parentis to the covered service member. This term does not
include parents “in law”.

c) Under the FMLA, a “spouse” means a husband or wife as defined under the
law in the state where the employee resides.

d) The “next of kin of a covered service member” is the nearest blood relative,
other than the covered service member’s spouse, parent, son, or daughter, in
the following order of priority: blood relatives who have been granted legal
custody of the service member by court decree or statutory provisions,
brothers and sisters, grandparents, aunts and uncles, and first cousins, unless
the covered service member has specifically designated in writing another
blood relative as his or her nearest blood relative for purposes of military
caregiver leave under the FMLA. When no such designation is made, and
there are multiple family members with the same level of relationship to the
covered service member, all such family members shall be considered the
covered service member’s next of kin and may take FMLA leave to provide
care to the covered service member, either consecutively or simultaneously.
When such designation has been made, the designated individual shall be
deemed to be the covered service member’s only next of kin. For example, if
a covered service member has three siblings and has not designated a blood
relative to provide care, all three siblings would be considered the covered
service member’s next of kin. Alternatively, where a covered service member
has a sibling(s) and designates a cousin as his or her next of kin for FMLA purposes, then only the designated cousin is eligible as the covered service member’s next of kin. EPS is permitted to require an employee to provide confirmation of covered family relationship to the covered service member pursuant to §825.122(j).

“Covered active duty” means:

a) “Covered active duty” for members of a regular component of the Armed Forces means duty during deployment of the member with the Armed Forces to a foreign country.

b) “Covered active duty” for members of the reserve components of the Armed Forces (members of the U.S. National Guard and Reserves) means duty during deployment of the member with the Armed Forces to a foreign country under a call or order to active duty in a contingency operation as defined in section 101(a)(13)(B) of title 10, United States Code.

The leave may commence as soon as the individual receives the call-up notice. (Son or daughter for this type of FMLA leave is defined the same as for child for other types of FMLA leave, except that the person does not have to be a minor.) This type of leave would be counted toward the employee’s 12-week maximum of FMLA leave in a 12-month period.

6) Military caregiver leave (also known as covered service member leave) to care for an injured or ill service member or veteran.

An employee whose son, daughter, spouse, parent or next of kin is a covered service member may take up to 26 weeks in a single 12-month period to take care of that service member.

The terms “covered service member” means:

a) A member of the Armed Forces (including a member of the National Guard or Reserves) 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

b) 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 Reserves) at any time during
the period of 5 years preceding the date on which the veteran undergoes that
treatment, recuperation, or therapy.

The term “serious injury or illness” means:

a) In the case of a member of the Armed Forces (including a member of the
National Guard or Reserves), means an injury or illness that was incurred by
the member in line of duty on active duty in the Armed Forces (or existed
before the beginning of the member’s active duty and was aggravated by
service in line of duty on active duty in the Armed Forces) and that may render
the member medically unfit to perform the duties of the member’s office,
grade, rank, or rating; and

b) In the case of a veteran who was a member of the Armed Forces (including a
member of the National Guard or Reserves) at any time during a period when
the person was a covered service member, means a qualifying (as defined by
the Secretary of Labor) injury or illness incurred by a covered service member
in the line of duty on active duty that may render the service member
medically unfit to perform the duties of his or her office, grade, rank or rating.

c) Outpatient status, with respect to a covered service member, means the status
of a member of the Armed Forces assigned to either a military medical
treatment facility as an outpatient; or a unit established for the purpose of
providing command and control of members of the armed Forces receiving
medical care as outpatients.

**Amount of Leave**

An eligible employee can take up to 12 weeks for the FMLA circumstances (1)
through (5) above under this policy during any 12-month period. The company will
measure the 12-month period as a rolling 12-month period measured backward from
the date an employee uses any leave under this policy. Each time an employee takes
leave, the company will compute the amount of leave the employee has taken under
this policy in the last 12 months and subtract it from the 12 weeks of available leave,
and the balance remaining is the amount the employee is entitled to take at that time.

An eligible employee can take up to 26 weeks for the FMLA circumstance (6) above
(military caregiver leave) during a single 12-month period. For this military
caregiver leave, the company will measure the 12-month period as a rolling 12-
month period measured backward. FMLA leave already taken for other FMLA
circumstances will be deducted from the total of 26 weeks available.
If a husband and wife both work for the company and each wishes to take leave for the birth of a child, adoption or placement of a child in foster care, or to care for a parent (but not a parent in-law) with a serious health condition, the husband and wife may only take a combined total of 12 weeks of leave. If a husband and wife both work for the company and each wishes to take leave to care for a covered injured or ill service member, the husband and wife may only take a combined total of 26 weeks of leave.

**Employee Status and Benefits During Leave**

While an employee is on leave, the company will continue the employee’s health benefits during the leave period at the same level and under the same conditions as if the employee had continued work.

If the employee chooses not to return to work for reasons other than a continued serious health condition of the employee or the employee’s family member or a circumstance beyond the employee’s control, the company will require the employee to reimburse the company the amount it paid for the employee’s health insurance premium during the leave period.

Under current company policy the employee pays a portion of the health care premium. While on paid leave, the employer will continue to make payroll deductions to collect the employee’s share of the premium. While on unpaid leave, the employee must continue to make this payment, either in person or by mail. The payment must be received in the Human Resources department by the 1st day of each month. If the payment is more than 30 days late, the employee’s health care coverage may be dropped for the duration of the leave. The employer will provide 15 days’ notification prior to the employee’s loss of coverage.

If the employee contributes to a life insurance or disability plan, the employer will continue making payroll deductions while the employee is on paid leave. While the employee is on unpaid leave, the employee may request continuation of such benefits and pay their portion of the premiums. If the employee does not continue these payments, the employer may discontinue coverage during the leave. If EPS maintains coverage, the company may recover the costs incurred for paying the employee’s share of any premiums, whether or not the employee returns to work.

**Employee Status after Leave**

An employee who takes leave under this policy may be asked to provide a fitness for duty (FFD) clearance from the health care provider. This requirement will be included in the company’s response to the FMLA request. Generally, an employee who takes leave under this policy will be able to return to the same position or a
position with equivalent status, pay, benefits and other employment terms, unless the former position was eliminated due to a reduction in the work force. The position will be the same or virtually identical in terms of pay, benefits and working conditions.

The company may choose to exempt certain key employees from this requirement and not return them to the same or similar position.

**Use of Paid and Unpaid Leave**
An employee who is taking FMLA leave must use all Paid Time Off (PTO) prior to being eligible for unpaid leave. The Paid Time Off leave will run concurrently with the FMLA.

**Intermittent Leave or a Reduced Work Schedule**
The employee may take FMLA leave in 12 consecutive weeks, may use the leave intermittently (take a day periodically when needed over the year) or, under certain circumstances, may use the leave to reduce the work week or work day, resulting in a reduced hour schedule. In all cases, the leave may not exceed a total of 12 work weeks (or 26 work weeks to care for an injured or ill service member over a 12-month period).

EPS may temporarily transfer an employee to an available alternative position with equivalent pay and benefits if the alternative position would better accommodate the intermittent or reduced schedule, in instances of when leave for the employee or employee’s family member is foreseeable and for planned medical treatment, including recovery from a serious health condition or to care for a child after birth, or placement for adoption or foster care.

For the birth, adoption or foster care of a child, the company and the employee must mutually agree to the schedule before the employee may take the leave intermittently or work a reduced hour schedule. Leave for birth, adoption or foster care of a child must be taken within one year of the birth or placement of the child.

If the employee is taking leave for a serious health condition or because of the serious health condition of a family member, the employee should try to reach agreement with the company before taking intermittent leave or working a reduced hour schedule. If this is not possible, then the employee must prove that the use of the leave is medically necessary.

**Certification for the Employee’s Serious Health Condition**
The company will require certification for the employee’s serious health condition. The employee must respond to such a request within 15 days of the request or
provide a reasonable explanation for the delay. Failure to provide certification may result in a denial of continuation of leave. Medical certification will be provided by using the DOL Certification of Health Care Provider for Employee’s Serious Health Condition.

The company may directly contact the employee’s health care provider for verification or clarification purposes using an HR professional or management official. The company will not use the employee’s direct supervisor for this contact. Before the company makes this direct contact with the health care provider, the employee will be given an opportunity to resolve any deficiencies in the medical certification. In compliance with HIPAA Medical Privacy Rules, the company will obtain the employee’s permission for clarification of individually identifiable health information.

The company has the right to ask for a second opinion if it has reason to doubt the certification. The company will pay for the employee to get certification from a second doctor which the company will select. The company may deny FMLA leave to an employee who refuses to release relevant medical records to the health care provider designated to provide a second or third opinion. If necessary to resolve a conflict between the original certification and the second opinion, the company will require the opinion of a third doctor. The company and the employee will mutually select the third doctor, and the company will pay for the opinion. This third opinion will be considered final. The employee will be provisionally entitled to leave and benefits under the FMLA pending the second and/or third opinion.

**Certification for the Family Member’s Serious Health Condition**

The company will require certification for the family member’s serious health condition. The employee must respond to such a request within 15 days of the request or provide a reasonable explanation for the delay. Failure to provide certification may result in a denial of continuation of leave. Medical certification will be provided by using the DOL Certification of Health Care Provider for Family Member’s Serious Health Condition.

The company may directly contact the employee’s family member’s health care provider for verification or clarification purposes using an HR professional or management official. The company will not use the employee’s direct supervisor for this contact. Before the company makes this direct contact with the health care provider, the employee will be given an opportunity to resolve any deficiencies in the medical certification. In compliance with HIPAA Medical Privacy Rules, the company will obtain the employee’s family member’s permission for clarification of individually identifiable health information.
The company has the right to ask for a second opinion if it has reason to doubt the certification. The company will pay for the employee’s family member to get certification from a second doctor which the company will select. The company may deny FMLA leave to an employee whose family member refuses to release relevant medical records to the health care provider designated to provide a second or third opinion. If necessary to resolve a conflict between the original certification and the second opinion, the company will require the opinion of a third doctor. The company and the employee will mutually select the third doctor, and the company will pay for the opinion. This third opinion will be considered final. The employee will be provisionally entitled to leave and benefits under the FMLA pending the second and/or third opinion.

Certification of Qualifying Exigency for Military Family Leave
The company will require certification of the qualifying exigency for military family leave. The employee must respond to such a request within 15 days of the request or provide a reasonable explanation for the delay. Failure to provide certification may result in a denial of continuation of leave. The certification will be provided using the DOL Certification of Qualifying Exigency for Military Family Leave.

Certification for Serious Injury or Illness of Covered Service member for Military Family Leave
The company will require certification for the serious injury or illness of the covered service member. The employee must respond to such a request within 15 days of the request or provide a reasonable explanation for the delay. Failure to provide certification may result in a denial of continuation of leave. The certification will be provided using the DOL Certification for Serious Injury or Illness of Covered Service Member.

Recertification
EPS may request recertification for the serious health condition of the employee or the employee’s family member no more frequently than every 30 days and only when circumstances have changed significantly, or if the company receives information casting doubt on the reason given for the absence, or if the employee seeks an extension of his or her leave. Otherwise, the company may request recertification for the serious health condition of the employee or the employee’s family member every six months in connection with an FMLA absence. The company may provide the employee’s health care provider with the employee’s attendance records and ask whether need for leave is consistent with the employee’s serious health condition.
Procedure for Requesting FMLA leave
All employees requesting FMLA leave must provide verbal or written notice of the need for the leave to their immediate supervisor, who will advise the HR department. If the leave is foreseeable, the immediate supervisor will require the employee to provide a written request for leave and reason(s) with a copy to the HR department. Failure of the employee to provide a written request for leave cannot be grounds to deny or delay the taking of FMLA leave. A certification by Employee of Intention to take family leave may be completed.

The company will provide individual notice of rights and obligations to each employee requesting leave within five business days or as soon as practicable.

When the need for leave is foreseeable, the employee must give the company 30 days’ notice. If it is not possible to give 30 days’ notice, the employee must give as much notice as is practicable. An employee who is to undergo planned medical treatment is required to make a reasonable effort to schedule the treatment in order to minimize disruptions to the company’s operations.

Designation of FMLA Leave
Within five business days after the employee has submitted the appropriate certification form, the HR department will complete and provide the employee with a written response to the employee’s request for FMLA leave using the DOL Designation Notice.

Intent to Return to Work From FMLA Leave
While on leave, employees are requested to report periodically to the company on the employee’s status and their intent to return to work.

Educational Leave of Absence
An educational leave of absence for the purpose of attending an accredited school, college or university as a full time student may be granted for a period of one semester or two quarters, when such leave is considered to be of beneficial interest to EPS.

Employees on educational leave of absence are not eligible for benefits under the Educational Assistance Program outlined in the section titled “Educational Assistance Program”.

The employee must submit proof of enrollment prior to taking leave, and provide copies of grade reports prior to returning, to substantiate the leave purpose.
Military Leave
EPS is committed to protecting the job rights of employees absent on military leave. In accordance with federal and state law, it is the Company’s policy that no employee or prospective employee will be subjected to any form of discrimination on the basis of that person’s membership in or obligation to perform service for any of the Uniformed Services of the United States. Specifically, no person will be denied employment, reemployment, promotion, or other benefit of employment on the basis of such membership. Furthermore, no person will be subjected to retaliation or adverse employment action because such person has exercised his or her rights under this policy. If any employee believes that he or she has been subjected to discrimination in violation of this policy, the employee should immediately contact the Human Resources Department.

Guidelines

(Extended) Military Leave
Employees directed to participate in extended military duties in the U.S. Armed Forces that exceed ten working days will be placed on an unpaid military leave of absence status for a period of as long as five years and will be entitled to the rights and benefits described below, subject to the procedures described below.

Procedures for all Military Leave

1) The employee will provide his or her immediate supervisor with notice that the employee will be engaging in military service, including, where feasible, a copy of the orders directing the military duty, unless the employee is prevented from doing so by military necessity. Employees are requested to provide such notice within 30 days of active military service. Failure to provide adequate notice may render the employee ineligible for the rights and benefits described in this policy.

2) To request a temporary or extended military leave of absence, the employee should, unless prevented from doing so by military necessity, obtain a request for a Leave of Absence form from Human Resources.

3) Human Resources will review and sign the Request for Leave of Absence Form, collect any applicable insurance premiums from the employee, generate other applicable documents and process accordingly.

4) Employees on temporary or extended military leave may, at their option, use any or all accrued Paid Time Off (PTO) during their absence.
5) When the employee intends to return to work, he or she must make an application for reemployment to Human Resources within the application period set forth below.

6) If the employee does not return to work, the supervisor must notify Human Resources so that appropriate action may be taken.

**Benefits**

If an employee is absent from work due to military service, benefits will continue as follows:

1) An employee on extended military leave may elect to continue group health insurance coverage for the employee and dependents under the same terms and conditions for a period not to exceed 31 days from the date the military leave of absence begins. The employee must pay the premium normally paid by the employee. After the initial 31 day period, the employee and covered dependents can continue group health insurance up to 24 months at 102% of the overall (both employer and employee) premium rate. Beginning after the first 31 days of military leave, group health insurance coverage for an employee and/or an employee’s covered dependents will run concurrently with applicable health insurance coverage under COBRA.

2) The group term Life/AD&D and Long Term Disability insurance provided by the company will terminate the day the employee becomes active military. Employees do not accrue Paid Time Off (PTO) while on military leave of absence status.

3) With respect to the Company’s 401K retirement plan, upon reemployment, employees who have taken military leave will be credited for purposes of vesting with the time spent in military service and will be treated as not having incurred a break in service. Immediately upon reemployment, the employee may, at the employee’s election, make any or all employee contributions that the employee would have been eligible to make had the employee’s employment not been interrupted by military service. Such contributions must be made within a period that begins with the employee’s reemployment and that is not greater in duration than three times the length of the employee’s military service. Employees will receive all associated company match for such contributions.

4) Voluntary supplement Life/AD&D insurance will terminate the day the employee becomes active military. Converting to an individual policy may
continue the voluntary coverage. Human Resources will send the employee the paperwork to convert the policy.

**Reemployment**

Upon an employee’s prompt application for reemployment (as defined below), an employee will be reinstated to employment in the following manner depending upon the employee’s period of military service:

1) Less than 91 days of service – (i) in a position that the employee would have attained if employment had not been interrupted by military service; or (ii) if found not qualified for such position after reasonable efforts by the Company, in the position in which the employee had been employed prior to military service.

2) More than 90 days and less than 5 years of military service – (i) in a position that the employee would have attained if employment had not been interrupted by military service or a position of like seniority, status and pay, the duties of which the employee is qualified to perform; or (ii) if proved not qualified after reasonable efforts by the Company, in the position the employee left, or a position of like seniority, status and pay, the duties of which the employee is qualified to perform.

3) Employee with a service-connected disability – if after reasonable accommodation efforts by the employer, an employee with a service-connected disability is not qualified for employment in the position he or she would have attained or in the position that he or she left, the employee will be employed in (i) any other position of similar seniority, status and pay for which the employee is qualified or could become qualified with reasonable efforts by the Company; or (ii) if no such position exists, in the nearest approximation consistent with the circumstances of the employee’s situation.

**Application for Reemployment**

An employee who has engaged in military service must, in order to be entitled to the reemployment rights set forth above, submit an application for reemployment according to the following schedule:

1) If service is less than 31 days (or for the purpose of taking an examination to determine fitness for service) – the employee must report for reemployment at the beginning of the first full regularly schedule working period on the first calendar day following completion of service and the expiration of eight hours after a time for safe transportation back to the employee’s residence.
2) If service is for 31 days or more but less than 180 days – the employee must submit an application for reemployment with Human Resources no later than 14 days following the completion of service.

3) If service is over 180 days – the employee must submit an application for reemployment with Human Resources no later than 90 days following the completion of service.

4) If the employee is hospitalized or convalescing from a service-connected injury – the employee must submit an application for reemployment with Human Resources no later than two years following the completion of service.

Exceptions to Reemployment

In addition to the employee’s failure to apply for reemployment in a timely manner, an employee is not entitled to reinstatement as described above if any of the following conditions exist:

1) The company’s circumstances have so changed as to make reemployment impossible or unreasonable. A reduction in force that would have included the person would be an example.

2) The employee’s employment prior to the military service was merely for a brief, non-recurrent period and there was no reasonable expectation that the employment would have continued indefinitely or for a significant period.

3) The employee did not receive an honorable discharge from military service.

General Benefits upon Reemployment

Employees reemployed following military service will receive seniority and other benefits determined by seniority that the employee had at the beginning of military leave, plus any additional seniority and benefits the employee would have attained, with reasonable certainty, had the individual remained continuously employed. In addition, an employee’s time spent on active military duty will be counted toward their eligibility for FMLA leave once they return to their job at EPS.

Documentation

An employee’s manager or Human Resources will, upon the employee’s reapplication for employment, request that the employee provide The Company with military discharge documentation that establishes the timeliness of the application for reemployment and length and character of the employee’s military service.
Benefits
An employee no longer on pay status is not eligible to receive payment for events (i.e., holidays, funeral leave, etc.) occurring during the leave period.

With the exception of family or medical leave (FMLA), and the first 31 days of extended military leave the EPS contribution toward group health insurance will terminate when the leave of absence begins.

When EPS-paid group health insurance coverage terminates, coverage will be made available to the employee under COBRA Continuation Coverage. Employees impacted should make inquiry to Human Resources regarding this COBRA coverage.

It is the employees’ responsibility to assure that timely payments are made to Human Resources while on extended leave for either COBRA payments or the employee portion of benefits if on FMLA leave or the first 31 days of military leave. If payments are not received by the due date, the insurance shall be terminated and the employee and dependents so notified.

Those employees who elect not to have COBRA coverage while on leave will be required to undergo the usual waiting period of one full calendar month of continuous employment before being eligible for insurance benefits. The employee should also be aware that coverage under these circumstances would take into account any pre-existing conditions.

Returning employees with COBRA coverage will be immediately reinstated to prior insurance benefits upon return to work.

Failure to Return from Leave
If an employee who has been granted a leave of absence does not return within three working days of the scheduled date of return, and has not contacted his/her supervisor or Human Resources with an acceptable explanation, that employee will be considered to have voluntarily resigned.

An employee who engages in gainful employment with any other employer during a leave of absence, except as specifically approved in writing by the responsible Division President or Vice President/General Manager and/or CEO and/or Vice Chairman/President, shall be terminated retroactive to the last day the employee worked.
In the case of military leave, if an employee fails to make an application for reinstatement of employment as outlined under the section titled “Reemployment” of this policy, the employee shall be considered to have voluntarily resigned.

**Procedures**

Any leave without pay for five working days or less may be granted by the responsible Division President or Vice/President/General Manager and/or CEO and/or Vice Chairman/President without written approval. All PTO in an employee’s account must be exhausted before unpaid leave is granted.

Leave of absence in excess of five working days requires the employee to submit a “Leave of Absence Request” at least 30 days prior to the effective date of leave, if possible, or as outlined above for the FMLA and Extended Military Leave along with any substantiating documentation required and as stated in this policy.

Any request for leave of absence requires the approval of the responsible Division President or Vice President/General Manager and/or CEO and/or Vice Chairman/President.

In an emergency, an employee unable to submit a request shall arrange for notification to management within three working days of the last day worked. The Supervisor shall initiate the request on behalf of the employee.

If an employee’s request for leave of absence is not approved, the employee will be immediately notified.
EDUCATIONAL ASSISTANCE PROGRAM

It is policy to encourage the educational development of employees. EPS will provide financial assistance to full time employees who wish to increase their job skills and potential value to EPS by continuing their formal education.

Eligibility

All regular full time employees who have completed 90 days of service.

Definitions

Accredited School

Public or private institutions, or correspondence schools, accredited by the Regional Association of Universities and Colleges, the Engineer's Council for Professional Development, or the American Bar Association.

Degree Program

A combination of courses, including both required and elective subjects which, when satisfactorily completed, meets the requirements for an academic degree.

Certificate Program

A series of courses offered by an accredited college or university leading to a non-degree designation in a specialized technical or professional area, directly related to the employee's job assignment.

Special Study Course

A course directly related to an employee's field of work or normal line of progression.

Satisfactory Completion

A grade of "B" or higher, or the equivalent in a point system in a course in which grades are given, or evidence of credit or acceptance in satisfying program requirements in a course in which grades are not given out.

Course Criteria

The courses of education taken by an employee must directly increase the employee's value to EPS in the present position, or potential value in a more responsible position. Such courses include both required and elective subjects
which, when satisfactorily completed, meet the requirements for an academic degree. Proof of matriculation is required.

The course must be taken for credit at an Accredited School, and is limited to the following types of programs:

a. Graduate Program leading to a Master's or Doctorate Degree.

b. Undergraduate Program leading to an Associate's or Bachelor's Degree.

c. Special study courses that are immediately applicable to the improvement of skills, or add to knowledge required in the employee's present job.

An employee enrolling in a law degree program will be considered for financial assistance only if the employee's present job would benefit from the legal training, and the employee has received prior approval from the CEO or Vice Chairman/President.

Audit courses or non-credit special courses, meetings, or seminars conducted by professional organizations or societies do not qualify for financial assistance under this program.

**Financial Assistance**

Educational assistance will not exceed fourteen (14) credits per calendar year, and is limited to 80% of the costs per credit, up to a maximum of $200 reimbursement per credit earned.

Reimbursement is for registration, laboratory and tuition fees. Travel, books, parking, athletic and/or student activity fees are not covered.

An employee who is eligible to receive financial assistance for educational courses from any other source, such as existing Public Laws or from state or private scholarships, will not be eligible for reimbursement under this program for that portion of tuition, which is so covered.

To be eligible for reimbursement, approved courses must be satisfactorily completed in accordance with the section titled “Satisfactory Completion”. Reimbursement will not be made until official school records, detailed receipts of payment, and evidence of satisfactory completion of the approved courses are submitted to Human Resources.
Payments to employees under this program are taxable income and should be reported on the employee's income tax return.

**Procedure**

An “Application for Educational Assistance” must be initiated by the employee, approved by the responsible Division President or Vice President/General Manager with final approval by Vice Chairman/President in advance of taking the course. Contact your Manager or Human Resources for the form. Requests will not be approved if received after the course begins, unless the delay is determined to be no fault of the employee.

Upon completion of the course(s), tuition receipts and records of satisfactory completion of the course must be submitted to Human Resources within 60 days for coordination of payment.

After course completion, the employee is required to continue employment for a minimum of six months per course, unless the employee is terminated by EPS due to a reduction of work force. If the employee terminates of his or her own accord, or is terminated with due cause, a refund to EPS, of educational assistance provided, is mandatory.
INVENTIONS AND AWARDS

Management shall encourage employees in the development of innovations and inventions with potential benefit to EPS. EPS will grant awards to innovators for meritorious disclosures.

Definitions

Innovation
A process used in commercial operations, or a product or item of equipment commercially manufactured, used or sold which, in the judgment of the CEO is new or is significantly different from that which EPS has previously manufactured, used or sold.

Invention
A process, product, or device originated after study, experimentation, research, and development.

Guidelines

Invention Agreement
Human Resources shall advise each new employee, consultant, and contract laborer of this policy and shall obtain a signed and witnessed “Statement and Agreement” from each person as a condition of and prior to commencing work for EPS.

Disclosures
Disclosure of Innovations and Inventions shall be made in writing through the supervisor to the cognizant Division President or Vice President/General Manager and the CEO and/or the Vice Chairman/President at the earliest possible time by an employee, consultant, or contract laborer who originally conceives an invention or innovation. Upon recommendation by the cognizant President or Vice President/General Manager and the CEO and/or the Vice Chairman/President, the disclosure shall be submitted to the Patent Counsel for processing (patentability and infringement search, patent application).

Upon submittal of a complete disclosure on a patentable Invention deemed to be of interest to EPS, EPS will grant a disclosure award to the inventor, and any other persons who materially assisted in preparation of the disclosure. The award shall be divided among the disclosure preparers, in accordance with their respective contribution thereto, as determined by EPS.
Patent Application
Patent application awards are not granted upon disclosure of the Invention, but only when a U.S. Patent Application is filed by EPS.

An additional award may be made for patents considered to be of a significant and exceptional value to EPS, if a patent is finally issued or if foreign patent applications are filed.

In each case where a U.S. Patent Application is divided into two or more applications, EPS shall determine whether an additional award is due or not.

Award
EPS is responsible for authorizing award payments in accordance with the following schedule:

- Disclosure: Inventors Aides.................................................$TBD
- Patent Application: Sole Inventor......................................$TBD
- Patent Application: Joint Inventors.................................$TBD
  (equally divided among the inventors)

The award shall be granted whether or not the inventor is still working for EPS. Payment will be made upon approval of the cognizant President or Vice President/General Manager and/or the CEO and/or the Vice Chairman/President; awards are taxable to the recipient. If the recipient is an employee, the award shall be added to gross pay and statutory deductions made.
EPS CORPORATION

CORPORATE COMPLIANCE PROGRAM

and

CODE OF ETHICS

Dated: November 2014

Adopted by: The Board of Directors
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Appendix A - EPS Corporation’s
   Code of Ethics .................................................................................................................
Dear EPS Employee:

Obeying the law and following high standards of ethics and morality is not only the right thing to do; it is also good business. For any major company doing business in America today, the consequences of its employees not following the law can be catastrophic, even if the conduct is accidental or the employee is unfamiliar with the law. Congress has finally recognized what we at EPS have long known: government and commercial customers rely on quality services and fair business practices. We have long been proud of our record, and in an effort to emphasize our commitment to corporate integrity, the Board of Directors of EPS has unanimously reaffirmed, as a corporate priority, the goal that every EPS employee act lawfully at all times in the performance of his or her job, and that employees at all times adhere to the highest standards of ethics, morality, honesty and decency in their job performance.

The Board of Directors has adopted the EPS Compliance Program, as reflected in this notebook. This Program has three purposes: (1) to make sure that all employees are familiar with the basic legal and ethical standards that govern their job performance; (2) to communicate to all employees the clear and unambiguous directive of the Board and the company’s management that all employees in all cases adhere to the law and conduct themselves ethically; (3) and to make known to all employees at all levels that assuring that the Company remains in full compliance with all applicable laws and standards of propriety is a part of the job responsibility of every employee. Toward that end, we will periodically review and update our Compliance Program and will notify all employees of any changes.

Please take the necessary time to review this Program and familiarize yourself with its contents. Every employee will be expected to conform fully with the program and all federal, state and local laws applicable to his or her job performance. If you are not certain what the law or the Company’s policy is, it is your responsibility -- and your right -- to get advice from your supervisor, or the Compliance Officer, as may be appropriate.

It is also your responsibility and your right to help the Company enforce this program. As you will see from reading this booklet, the Company expects any employee who is asked to do something that he or she feels is not right, or who sees activity by other employees (including managers) that may be unlawful or in violation of company policy, to make a report of that conduct or activity. EPS’ compliance program establishes ways for reports to be made, including if necessary direct telephone reporting to the Compliance Officer. The Program also provides that no employee will be subject to any discipline or retaliation for making such a good faith report. It is the Board’s hope that, in keeping with the tradition of the Company and the dissemination of this Policy, conduct requiring these kinds of reports will be extremely rare. But this program can only be fully effective if each employee at every level recognizes as a part of his or her job performance the responsibility to help the company police itself.

EPS expects more of its employees than obedience to the letter of the law; that much goes without saying. EPS also expects that its employees will obey the spirit of the law, and will conduct themselves, in all ways and at all times, in a manner that brings credit to themselves, their families,
their community and the Company. This Corporate Compliance Program has been adopted by the Board and distributed to all employees so that there can be no question of the Company’s intention.

As this Program makes clear, an integral part of the Company’s expected future growth and prosperity is adherence to the law and high standards of moral conduct by all its employees. On behalf of the Board of Directors, thank you in advance for your performance of your work for EPS lawfully, ethically and morally. EPS employees have made our company leaders in the industry, and we believe that our commitment to this Compliance Program will help us maintain our position in the industry.

Sincerely,

Francesco A. Musorrafiti  
Chairman and CEO
I. **EPS CORPORATE COMPLIANCE PROGRAM**

A. **BOARD OF DIRECTORS**

The Board of Directors will oversee the compliance effort.

B. **CORPORATE COMPLIANCE OFFICER**

The Corporate Compliance Officer will be a major focal point of the Compliance Program. Questions, complaints and suggestions will filter to the Corporate Compliance officer from numerous sources, including employees, customers, suppliers and others. The Corporate Compliance Officer will answer questions, resolve problems and monitor the overall Compliance Program.

C. **RESPONSIBILITIES OF THE CORPORATE COMPLIANCE OFFICER**

This section outlines the responsibilities of the Corporate Compliance Officer.

1. **Corporate Compliance Officer**

The Chief Executive Officer, with the approval of the Board of Directors, will appoint a Corporate Compliance Officer, who will have responsibility for overseeing the successful operations of the Compliance Program. The Assistant Corporate Compliance Officer will provide backup to the Corporate Compliance Officer in the monitoring of the program.

EPS has appointed the following Corporate Compliance Officer and Assistant Corporate Compliance Officer:

<table>
<thead>
<tr>
<th>Corporate Compliance Officer</th>
<th>Assistant Corporate Compliance Officer</th>
</tr>
</thead>
<tbody>
<tr>
<td>John E. Gagliano, Esquire</td>
<td>Kelley Meritzis</td>
</tr>
<tr>
<td>78 Apple Street</td>
<td>78 Apple St.</td>
</tr>
<tr>
<td>Tinton Falls, NJ 07724</td>
<td>Tinton Falls, NJ 07724</td>
</tr>
<tr>
<td><a href="mailto:john.gagliano@epscorp.com">john.gagliano@epscorp.com</a></td>
<td><a href="mailto:kelley.meritzis@epscorp.com">kelley.meritzis@epscorp.com</a></td>
</tr>
<tr>
<td>(732) 747-8277 – Telephone</td>
<td>(732) 747-8277 - Telephone</td>
</tr>
<tr>
<td>(732) 530-4726 – Fax</td>
<td>(732) 530-4726 - Fax</td>
</tr>
<tr>
<td>(908) 902-8837 - Mobile</td>
<td>(908) 601-5851 - Mobile</td>
</tr>
</tbody>
</table>

The Corporate Compliance Officer will have open access to senior management and the Corporate Compliance Committee of the Board of Directors.

This Compliance Officer is responsible for all aspects of compliance, for establishing and revising the policies set forth in this manual, and for the implementation of the procedures designed to achieve these policies, including the following duties:
a. **Review and Update the Compliance Program.**

The Corporate Compliance Officer will periodically review and update the Compliance Program (as necessary).

b. **Reporting to the Board of Directors.**

The Corporate Compliance Officer will report to the Board of Directors on a periodic basis. These reports will describe the compliance issues raised and how these issues were resolved. The reports will include recommendations on how the compliance program, and training done to implement the program, can be strengthened or improved.

c. **Dissemination of Information.**

The Corporate Compliance Officer must establish and oversee procedures to ensure that every employee is aware of the Compliance Program. These procedures will include the following:

(1) All employees will be provided convenient access to relevant portions of the Compliance Program through the EPS Manual (“Manual”) available through the EPS time and expense collection system (“Deltek”). The Manual includes an easy to comprehend description of the Compliance Program, including instructions as to how the employee should handle any questions related to compliance or report any compliance issues;

(2) All employees will annually acknowledge, in writing, that they have received a complete copy of the Compliance Program and will comply with the Program’s requirements;

(3) All signed acknowledgments will be retained within the corporate compliance office.

d. **Overseeing and Coordinating Training Programs.**

In conjunction with the Human Resources Department, the Corporate Compliance Officer will oversee and coordinate all compliance training. The Company’s training procedures will include the following:

(1) Upon commencing employment with the Company, all employees will receive access to the Manual. Each employee will be trained on his or her responsibilities under the Compliance Program. Each employee will acknowledge receipt of the information and training, and certify that he or she understands his or her role in the Compliance Program. These certifications will be stored in the Employee’s personnel file;

(2) Every employee will receive additional compliance information and training on a periodic basis, with the receipt of such information and training documented;

(3) For every compliance training session, materials specifically prepared to strengthen the Company’s Compliance Program may be developed. The Corporate Compliance Officer will review and oversee materials used at the compliance training sessions.
(4) The Corporate Compliance Officer will ensure that compliance and ethics training is required for all employees, especially personnel involved in billing, sales and marketing. Such training will emphasize EPS’ commitment to compliance with all laws, regulations and guidelines of federal and state programs. Training will be conducted regularly, using a variety of teaching methods to ensure that all employees fully comprehend the implications of failing to comply with EPS’ compliance plan. Training and education programs will cover EPS compliance policies and will reinforce the fact that strict compliance with the law and EPS policies is a condition of employment. Employees will be informed that failure to comply may result in disciplinary action, including termination. Training of sales and marketing personnel should highlight the fact that EPS will take appropriate disciplinary action up to and including termination for violation of the laws for failure to report a potential violation by another employee, supervisor or outside contractor.

(5) The Corporate Compliance Officer will also address the need for periodic continuing education which may be required by law or regulation for certain personnel. Continuing education programs of this type will help ensure a knowledgeable and more productive staff.

(6) There should be no doubt in the minds of employees and others who are associated with EPS about its commitment to compliance with all laws, regulations and guidelines. Compliance is one of EPS’ most important priorities. In addition to the compliance and ethics training and continuing education programs, the Corporate Compliance Officer will reemphasize this message by posting in common work areas and other prominent areas accessible to all employees a notice clearly reminding employees of EPS commitment to compliance with all laws and regulations.

e. Investigation of Compliance Issues.

It is the responsibility of the Compliance Officer to investigate any compliance issues brought forward, whether through monitoring of procedures, the audit process or via the “Open Line.” Investigation will commence at the earliest date and the Compliance Officer should determine whether to involve outside legal counsel in any investigation. The Compliance Officer will report any serious allegations to counsel. All records of any report and of any investigation of a Compliance issue report will be kept on file with the Compliance Officer, and will be kept in a secure location.

f. Documenting All Actions Taken.

The Corporate Compliance Officer may, from time to time, take action as a result of a Compliance Issue Report. The Corporate Compliance Officer will properly document every action taken. This documentation must fully explain the nature of the compliance issue and its resolution. The Corporate Compliance Officer, in conjunction with the appropriate level of management, may take disciplinary action against any employee, where appropriate. The appropriate disciplinary action will be determined based on the nature, severity and extent of wrongdoing. Any record of action taken in connection with a Compliance issue report will be kept on file.

g. Existence of a Compliance Officer Does Not Diminish Other Employee’s Responsibilities.
The fact that the Company has identified a Corporate Compliance Officer does not diminish or alter an individual employee’s independent duty to abide by the Compliance Program or an individual manager’s responsibility to ensure compliance by those employees he or she manages.

h. **Access to the Compliance Officer.**

An open line of communication between the Compliance Officer and EPS staff is critical to the successful implementation and operation of the Compliance Program. In order to avoid fraud and abuse and to encourage communication, EPS maintains an open door, complete anonymity, non-retribution policy available to all employees.

i. **Auditing and Monitoring.**

The Compliance Officer will thoroughly monitor implementation of this Compliance Plan and report on a regular basis to the Board of Directors. Compliance Officer will keep himself fully aware and review EPS operations, with particular attention paid to billing, sales, marketing, notices and disclosures and pricing to ensure compliance with EPS compliance policies and plan and all applicable federal and state laws. In addition, this review will address issues related to contracts, competitive practices, marketing materials, information concerning services rendered, reporting and record-keeping.

Quality assurance and zero tolerance of fraud and abuse are the goals of the Compliance Office. The compliance audit may include on-site visits of each division; interviews with personnel involved in management, operations, billing, sales, marketing and other related activities; reviews of written materials and documentation used by EPS, and trend analysis studies, etc.

D. **EMPLOYEES’ DUTIES AND RESPONSIBILITIES FOR COMPLIANCE**

All EPS employees must endeavor at all times to follow the policies and compliance procedures set forth in this policy. All EPS employees must report any violations of these policies and procedures immediately. Any person who in good faith promptly and truthfully reports a violation of these policies or procedures not involving that person will not be subjected to punishment or retribution in any form. If the person making the report is involved in the compliance violation, the fact that the person voluntarily and in good faith discloses the compliance violation will be positively considered in any disciplinary action.

All EPS employees must obey all laws of federal, state and local governments at all times, regardless of what local or industry practice may be in any given area.

1. **Explanation of Employees’ Duties**

All EPS employees, from the highest executive to management to hourly and part-time employees, are required to follow the policies and procedures set forth in this Compliance Plan. Managers and certain other supervising and management personnel will be required to submit signed verifications to the effect that they are familiar with EPS Compliance Policies and Procedures and have
observed them, is unaware of any violations of the Policies and Procedures, and will continue to follow
the Policies and Procedures.

2. **How to Report Violations**

   All EPS employees must immediately report any violations of the policies and procedures set
forth in this manual.

   Every employee who knows of a violation of a compliance policy or procedure has three ways
to report it: (1) to his or her supervisor; (2) Corporate Compliance Officer; or (3) the Hotline - 732-
546-2607.

   Every employee should feel free first to report a violation to his or her supervisor. If any
employee feels hesitant or reluctant in any way about reporting such a violation to his or her supervisor
- for example, if the supervisor is personally involved in the violation - the employee may report the
violation in confidence to the EPS Corporate Compliance Officer. Contact information, including the
mobile phone number of the EPS Corporate Compliance Officer is listed below.

   To report a suspected violation to the EPS Corporate Compliance office, an employee may
either: 1) write or (2) phone the following:

   John E. Gagliano
   Corporate Compliance Officer
   EPS
   78 Apple Street
   Tinton Falls, NJ  07724
   (732) 747-8277 – Telephone
   (732) 530-4726 – Fax
   (908) 902-8837 - Mobile
   john.gagliano@epscorp.com

   If you are or have been involved in what you believe may have been a violation of the
Compliance Program, we urge you to come forward quickly with all relevant information. If an
employee voluntarily makes full disclosure and cooperates fully in any investigation, that will be taken
into account by the Compliance Officer in considering appropriate discipline. Any employee who
believes that he or she is being treated unfairly as a result of making such a report should convey this
to the Compliance Officer. Any person found to have retaliated or in any way punished another
employee for having reported a violation in good faith will be subject to discipline.

   However, any employee who knowingly makes a false report regarding a compliance violation
may be subject to discipline.

3. **Compliance Procedures**

   Managers and certain other supervising and management personnel will be required to certify
annually that they have complied with all aspects of this program and will continue to do so, and that
they are unaware of any violations of this program. However, should any employee become aware of any violation of this compliance program during the course of the year, the employee must report the violation to his or her supervisor, or to the Corporate Compliance Officer.

4. Discipline

The importance of securing every employee’s cooperation in this undertaking cannot be overstated, and any failure to follow these policies can result in severe discipline, including termination. Likewise, any failure to report a violation, even if the violation is committed by some other employee, can result in discipline. Thus, it is in everyone’s best interest to voluntarily report a violation.

EPS’ seriousness in adhering to these policies cannot be over emphasized, and EPS employees are expected to bring the same seriousness to this aspect of their employment as to all other areas. Managers and supervising personnel will have included in their performance evaluation the extent to which full compliance with this program has been achieved in their areas of responsibility.

Corrective and/or disciplinary action will be taken against individuals who fail to comply with EPS’ compliance policies and/or federal or state laws or who have otherwise engaged in wrongdoing that has the potential of impairing EPS’ status as a reliable, honest, trustworthy supplier.

All employees must be aware that disciplinary action will be taken and punishments enforced for violations of this plan or any federal or state laws.

E. COMPLIANCE AS AN ELEMENT OF PERFORMANCE PLANS.

To ensure that corporate integrity rises to the level of importance required of EPS, EPS requires that the promotion of and adherence to compliance be an element in evaluating the performance of managers and supervisors. They, along with other employees, will be periodically trained in new compliance policies and procedures. In addition, all managers and supervisors involved in the sales or marketing, will on a periodic basis:

1. Discuss with all supervised employees the compliance policies and legal requirements applicable to their functions;

2. Inform all supervised personnel that strict compliance with these policies and requirements is a condition of employment; and

3. Inform all supervised personnel that EPS will take disciplinary action up to and including termination for violation of these policies or requirements. In addition to making performance of these duties an element in evaluations, managers and supervisors may be disciplined for failure to adequately instruct their subordinates or for failing to detect noncompliance with applicable policies and legal requirements, where reasonable diligence on the part of the manager or supervisor would have led to the discovery of any problems or violations and given EPS the opportunity to correct them earlier.
F. CORRECTIVE ACTION.

(1) Investigating, Reporting and Correcting Identified Problems.

a. Investigation

Violations of EPS’ Compliance Plan or failures to comply with federal or state law and other types of misconduct threaten EPS’ status as a reliable, honest and trustworthy contractor. Consequently, if the Compliance Officer or others involved in management of EPS learn of potential violations or misconduct, they will investigate the matter to determine whether a material violation has in fact occurred. If a violation has occurred, management will take steps to rectify it and report it to the appropriate authorities, if necessary. Depending on the nature of the allegations, the investigations into allegations of wrongdoing or misconduct will probably include interviews and review of relevant documents. Under certain circumstances, the Compliance Officer may wish to engage outside auditors or counsel to assist him with the investigation.

If the investigation of an alleged violation is undertaken and the Compliance Officer believes the integrity of the investigation may be at stake because of the presence of employees under investigation, the employee(s) allegedly involved in the misconduct may be removed from his or her current work activity until the investigation is completed. In addition, EPS will take steps to preserve documents or other evidence relevant to the investigation. Once an investigation is completed, if disciplinary action is warranted, it will be immediate and imposed in accordance with the EPS’ standards of disciplinary action.

b. Reporting

If management receives credible evidence of misconduct from any source and, after appropriate investigative inquiry, has reasonable grounds to believe that the misconduct either: (a) violates criminal law, or (b) constitutes a material violation of the civil law, rules and regulations the Compliance Officer should consult with counsel to determine the appropriate course of action.

In all events, EPS will continue to investigate the violation and will also take appropriate corrective action, including prompt restitution of any damages and the imposition of appropriate disciplinary action.

c. Corrective Action

If the investigation reveals that misconduct did occur, corrective action will be initiated. In addition to taking corrective action, EPS will take whatever disciplinary action is necessary to cure the problems identified by the investigation and prevent it from happening again.

II. GENERAL COMPLIANCE POLICIES
EPS is subject to many federal, state, and local laws and regulations, including but not limited to the Federal Acquisition Regulation (“FAR”), Americans with Disabilities Act, of the Civil Rights Act of 1964, Age Discrimination in Employment Act and the federal Family and Medical Leave Act of 1993. EPS’ management is dedicated to compliance with these laws and all regulations promulgated under them. It is not necessary that all employees understand all the specific requirements of these various statutes. It is not the purpose of this Compliance Policy to make each employee an expert on these laws. Through our compliance officer, EPS has access to able and competent counsel who may be called upon from time to time to advise EPS on the legal standards in particular circumstances. For now, all employees need to understand that there are a variety of complicated federal and state statutes that govern our conduct, and that we intend for you to comply with all of them. This Compliance Policy contains useful Do’s and Don’ts in various areas to make all employees sensitive to potential areas of problems where employees should be sure to consult with the compliance officer if they are not sure what EPS’ policies are or what the law requires of us. In sum, remember to avoid all that is clearly prohibited and, whenever in doubt or dealing in a gray area, please consult with the Corporate Compliance Officer before acting.

It is the policy of EPS that every employee will at all times and in all ways comply with both the letter and the spirit of federal, state and local laws, and that every employee will adhere to the highest standards of ethics, morality, honesty and decency in the performance of the duties of his or her job. A copy of the Code of Ethics is attached as Appendix A. The policy will be read and signed by every employee.

To ensure that every employee adheres to this general policy, EPS has adopted several specific policies in the Manual. Although the specific policies do not cover every conceivable situation an employee may face, they provide a starting point. If any employee has any questions about whether certain conduct is lawful or otherwise meets EPS’ standards, that employee should approach his or her supervisor or the Corporate Compliance Officer.
In addition to the principles contained in the Code of Ethics, EPS draws your attention to the following specific sections of the Manual as containing important policies concerning critical areas of compliance. Links to these policies are available online through the Deltek Time and Expense collection system.

- **Intellectual Property Compliance Standards** – Refer to the “Protection of Intellectual Property” and “Acceptable use of Computers” link
- **Workplace Safety/OSHA** – Refer to the “Workplace Safety” link
- **Conflicts of Interest** – Refer to the “Conflicts of Interest” link
- **Bribery/Gratuities** - Refer to the “Policies on Dealing Abroad” link
- **Policy on Dealings Abroad** – Refer to the “Policy on Dealing Abroad” link
- **Truth in Reports and Records** – Refer to the “Truth in Reports and Records” link
- **EEOC Policy** – Refer to the “Affirmative Action and Equal Opportunity” link.
- **Confidential Information and Trade Secrets** – Refer to the “Ethical Business Relationships” link.
- **Export Controls** - Refer to the “Policies on Dealing Abroad” Link
- **Marketing** – Refer to the “Ethical Business Relationships” link.
- **Policy Against Harassment** – Refer to the “Workplace Violence” and “Sexual Harassment” link.

If you are unable to view these policies online please contact your manager or Human Resources for copies of these policies.
CERTIFICATION

[FOR COMPLETION BY EMPLOYEES, SUPERVISORY AND MANAGEMENT PERSONNEL]

I, __________________________, certify that I have read the EPS Corporate Compliance Program and Code of Ethics. I further certify that I understand all of the original and any supplemental provisions and agree to abide by them.

I understand that if I do become aware of any violations of this program during the course of the year I must report the violation to my supervisor or the Corporate Compliance Officer.

Dated: __________________________

Signature: ________________________

Print Name: ________________________
ANNUAL CERTIFICATION OF THE EPS CORPORATE COMPLIANCE PROGRAM AND CODE OF ETHICS

[FOR COMPLETION BY SUPERVISORY AND MANAGEMENT PERSONNEL]

Are you aware of any violations of the EPS Corporate Compliance Program and Code of Ethics?

☐ No, I am unaware of any violations of the Program.

☐ Yes, I am aware of a violation of the Program and will immediately contact my supervisor or the Corporate Compliance Officer.

CERTIFICATION

I have complied with all aspects of the EPS Corporate Compliance Program and Code of Ethics and will continue to do so.

Dated: ___________________________  Signature: ___________________________

Print Name: ___________________________
APPENDIX A

EPS Corporation
CODE OF ETHICS

EPS and its affiliated companies have earned the trust and confidence of those with whom they do business by conducting their affairs honestly and fairly. To maintain this trust and confidence, EPS has established a Code of Ethics which sets forth certain critical principles. Many of these subjects are covered in more detail in EPS’s Administrative Manual (“Manual”). These standards apply to everyone who works for EPS.

STANDARDS:

1. Employees will comply with all laws and regulations applicable to the conduct of the corporation’s business.

2. Employees will not discriminate against anyone on the basis of race, religion, sex, age, national origin, sexual orientation or affectation, genetic information, veteran status or disability.

3. Employees will avoid putting themselves in a position in which their personal interests and those of the corporation are in conflict, or which might interfere with the employee’s ability to perform his or her job as well as possible.

4. Employees will not use for personal gain any information they obtain on the job which is not readily available to the general public, and they will not make unauthorized disclosure of any such information which might damage the interests of the corporation or its employees.

5. Employees will not use corporate property or services for personal gain and will not remove or dispose of corporate materials, supplies or equipment without proper authority.

6. Employees will not accept any form of gratuity which would tend to affect, or give the appearance of affecting, their judgment in the performance of their duties.
7. Employees will not give or offer to give gratuities in any form to anyone for the purpose of influencing, or which give the appearance of influencing, an individual’s judgment in the performance of his or her duties.

8. Employees will take all actions with due regard for the health and safety of other employees and the public, and the protection of the environment.

9. Employees will not authorize the use of corporate funds or resources in the support of any political party or its candidates for elected office.

10. Employees will not be under the influence of alcohol or possess, use, or be under the influence of illegal drugs while on the job or during working hours, including meal breaks.

11. Employees with responsibility to initiate or modify entries in the corporation’s accounting records will perform such duties in conformance with the corporation’s accounting policies and procedures.

12. EPS employees may not create, maintain or submit records, reports or statements (including timesheets and expense reimbursement request forms) that are inaccurate, false or misleading.

13. Employees will not withhold information from or give false or misleading information to anyone conducting duly authorized investigations.

14. Employees will report, in good faith, violations of law, regulations or company policies as soon as possible.
EMPLOYEE CONDUCT STANDARDS

Normal standards of good conduct apply to all employees. If normal standards of conduct are violated, managers shall initiate fair and firm corrective action.

Employee Conduct Standards
Good conduct, self-discipline and good job performance are expected of all employees at all times. Acts to the contrary are not acceptable, and are the basis for disciplinary action. Such acts include, but are not limited to:

- Misuse of employee lists, customer lists, blueprints, records, or of EPS proprietary or classified information of any kind, or removal without authority.
- Theft or possession without proper authority, of EPS property or personal property of another employee.
- Violation of Company policies
- Fighting on work premises
- Possessing, consuming or being under the influence of dangerous and/or illegal drugs at any time on EPS premises, driving an EPS owned, rented or leased vehicle or while performing work for EPS.
- Insubordination or refusal to obey orders of a supervisor to perform a job assignment.
- Falsification of employment application, Personnel Security Questionnaires, work or job records, or other EPS records.
- Gambling on EPS premises at any time.
- Using EPS-owned or controlled material, time or equipment for making an article for an unauthorized purpose or for personal use.
- Loaning or duplicating EPS keys.
- Public indecent conduct on EPS premises, or while performing work on behalf of EPS.
- Using another person’s badge, identification card, or special pass for the purpose of gaining admission to EPS premises, or to a restricted area within such premises, or permitting another person to use your badge, identification card, or special pass for such purposes.
- Interference with, or failure to cooperate with, the Security Officer, or other proper authority in the performance of their duties.
- Threatening, intimidating, coercing or interfering with fellow employees while on EPS premises, or creating discord or lack of harmony in the business environment.
- Deliberately falsifying your own or another employee’s time card, or allowing another employee to do the same for you.
- Unauthorized entry or exit from EPS premises at points other than those established as normal areas of entry and exit.
- Possession of firearms, explosives or toxic agents on EPS property, unless specifically authorized by management.
- Unauthorized operation, repair or attempt to repair machines, tools or equipment.
- Inducing an employee/consultant to violate EPS policies.
- Posting, defacing, or removing notices or signs, or writing on bulletin boards or EPS property, unless authorized by Administration.
- Disregard of safety rules, fire regulations, and common safety practices.
- Distribution of written, printed matter or e-mail of any description for any Purpose whatsoever not specifically pertaining to job requirements at any time in the working areas unless expressly authorized by Human Resources. Such distribution is not permitted in the non-working areas on the EPS premises during working time unless expressly authorized by Human Resources.
- Collection of funds or solicitation for any purpose whatsoever on working time unless expressly authorized by Human Resources.
- Using personal tools or equipment on the job unless expressly authorized by the employee’s immediate supervisor.
- Violation of parking and traffic regulations.
- Allowing a non authorized driver or non-EPS employee to drive a company owned, leased or rented vehicle.
- Failure to report for first aid or to report an accident.
- Solicitation or acceptance of gratuities, such as:
  1. Except for the guidelines outlined in the section titled “Ethical Business Relationships” employees may not accept gifts or cash gifts from a supplier, customer or competitor;
  2. Receiving any favor, this might be inferred by others to adversely affect one’s judgment.
APPEARANCE STANDARDS

All employees are representatives of EPS and are expected to maintain a professional appearance. Clean hands, hair, and dress and overall personal hygiene are important in your daily contact with customers, vendors and coworkers.

An employee may be required to wear an identification tag or a pin with the company logo while on the job. In addition, an employee may be required to wear a company uniform, while performing services at certain designated work-sites. The employee will be responsible for purchasing the requisite uniform, which will be appropriate for street wear or to wear to other establishments. EPS may have clothing items from time to time that the employee can purchase. EPS offered clothes normally have the company logo. If the employee requires that money be advanced by EPS to cover the cost of the uniform, it will be deducted from the employee’s paycheck at a future date.
To: All EPS Employees

From: Kelley Meritzis, VP Administration

Date: February 15, 2012

Subject: Dress Code

This memo is intended to provide clarification on EPS’ appearance standards which are detailed in the EPS Manual.

EPS APPEARANCE STANDARDS

“All employees are representatives of EPS and are expected to maintain a professional appearance. Clean hands, hair, and dress and overall personal hygiene are important in your daily contact with customers, vendors and coworkers.

An employee may be required to wear an identification tag or a pin with the company logo while on the job. In addition, an employee may be required to wear a company uniform, while performing services at certain designated work-sites. The employee will be responsible for purchasing the requisite uniform, which will be appropriate for street wear or to wear to other establishments. EPS may have clothing items from time to time that the employee can purchase. EPS offered clothes normally have the company logo. If the employee requires that money be advanced by EPS to cover the cost of the uniform, it will be deducted from the employee’s paycheck at a future date.”

Employees contribute to the corporate culture and reputation of EPS in the way they present themselves. As an employee of the Company, we expect you to present a clean and professional appearance when you represent us, whether you are in or outside of the office.

Clothing is to be neat and clean. A reasonable standard of dress rules out revealing clothing, excessively tight or short clothing, halter-tops, clothing with rips or tears, or any extreme in dress.
Management reserves the right to interpret what is considered appropriate in a business office and in keeping with an employee’s job assignment.

Employees who do not meet a professional standard may be sent home to change and non-exempt employees will not be paid for that time off.
PERSONAL TELEPHONE CALLS

Because of the large volume of company business transacted by telephone, the use of company telephones for personal matters is discouraged.

EPS recognizes that when all adult members of a household work, there may occasionally be times when personal calls must be made or received during business hours. Such calls must be held to a minimum, however, and must not interfere with the employee’s work. Workers are encouraged to make such calls during their breaks or lunchtime.

In an emergency, phone calls may be made or received. Emergencies include illness or an injury to a member of one’s family, changed plans regarding an employee’s transportation home from work, extreme weather conditions, etc.

Where a long-distance call must be made in an emergency situation, the call must be billed to the caller’s calling card number if cell phone or payphone is inaccessible.

Long “chatty” telephone conversations concerning matters other than EPS business may result in disciplinary action.
PERSONAL CELL PHONE USE

While at work employees are expected to exercise the same discretion in using personal cellular phones as is expected for the use of EPS phones. Personal calls during the work hours, regardless of the phones use, can interfere with employee productivity and be distracting to others. Employees are therefore asked to make personal calls during breaks and lunch period.

Cell phones shall be turned off or set to silent or vibrate mode during meetings, conferences and in other locations where incoming calls may disrupt normal workflow.

Employees may carry personal cell phones and use them while at work on a minimal basis. If employee use of a personal cell phone causes disruptions or loss in productivity, the employee may be subject to disciplinary action.

If an employee is operating a company vehicle and receives a call on a cell phone, the employee shall pull to the side of the roadway, into a parking lot or other safe location to respond to the call. Failure to follow this policy may result in disciplinary action up to and including termination.
VIDEO AND AUDIO RECORDING DEVICES

The use of camera phones, PDAs, or other audio or video recording-capable devices within the company may constitute an invasion of employees’ personal privacy and may breach the confidentiality of EPS Corporation’s trade secrets or other protected information. Therefore, the use of camera or other video or voice recording-capable devices on company premises is prohibited without the express prior permission of senior management and of the person(s) present at the time.
Computers and equipment provided to the employees of EPS and/or Government Furnished Equipment are to be used only for the business for which that equipment has been provided.

Internet access is provided to individuals based upon business needs to benefit EPS through connection to worldwide information resources. Employees have a responsibility to maintain and enhance EPS’ public image while using EPS or Government Furnished Equipment (GFE) computers by following these guidelines:

- Employees using Internet access via EPS hardware and software are representing EPS. As such, their conduct should be ethical and lawful at all times.
- Accessing pornographic sites/links is totally unacceptable. EPS prohibits the use of EPS Equipment for such purposes. Any EPS employee found to be using EPS computers and/or GFE for this purpose will be subject to immediate dismissal.
- All files and messages created, sent, retrieved and/or saved on the EPS network are the property of EPS and should be not be considered private information. EPS reserves the right to access and monitor computer usage including all messages and files on the EPS computer system at any time. All communications and files can be disclosed to law enforcement officials or other third parties without prior consent of the sender or the receiver.
- Internet access should not be used for personal gain or advancement of personal views, for solicitation of non-company business, or result in the disruption of the EPS network operation or interfere with personal productivity at work.
- Employees are responsible for the content of all text, audio, or images they place or send over the Internet. Fraudulent, harassing, or obscene messages are prohibited. All messages on the Internet should be identified with the employee’s name. Employees may not obscure the origin of messages and the information published should not violate or infringe upon the rights of others. Abusive, profane or offensive language transmitted through the EPS network is strictly prohibited.
• Employees may not download software without the express acknowledgement and support of the IT Department to ensure that proper licenses are obtained and viruses are not transmitted.

• Employees may not send/upload EPS copyrighted materials, trade secrets, proprietary information, or similar materials to third parties without permission. Employees may not violate the copyright laws in regard to receipt/download of materials available on the Internet by copying and disseminating information, except for purposes falling under the category of “fair use.”

• Harassment of any kind is strictly prohibited. Messages with derogatory or inflammatory remarks regarding race, religion, national origin, sexual orientation, or other protected attributes may not be transmitted.

The IT Department also maintains certain policies and procedures addressing specific issues relating to the use of EPS network resources. These procedures may change from time to time. Employees are responsible for being aware of these and for the periodic review of these procedures. Employees must contact the Information Technology Department to request copies of the policies and procedures.

Violations of this section may result in disciplinary action against the employee.
EMPLOYEE ATTENDANCE

Since good employee attendance is necessary for efficient business operations, it is an important job qualification which all employees are required to meet.

Supervisors are accountable for communicating to employees the importance of good attendance, and for the timely identification and resolution of attendance problems. However, the primary responsibility for good attendance remains with the individual employee.

Excessive and repeated absence or tardiness may disqualify an employee from promotion and is an element in determining compensation.

Dismissal may result if absenteeism or tardiness is deemed to be excessive.

Definitions

Absence
Absence from work for over four hours in a workday.

Tardiness/Partial Absence
Tardiness is a type of absence, which is defined as unexcused time of up to four hours away from the workstation. It includes late arrival for work, leaving before the end of the scheduled workday, delayed return from lunch and other scheduled breaks in the work schedule.

Attendance Standards
Employees who fail to personally notify either their supervisor or Human Resources during three consecutive days of absence will be deemed to have voluntarily resigned and their employment terminated as a resignation.

Employees who have been issued final warnings regarding attendance are not eligible for transfers or promotions until they have an acceptable attendance record for a period of 90 consecutive days.

Employee Responsibilities
Whenever possible, employees should make advance arrangements with their supervisors for an authorized absence, and file the appropriate request forms.

Employees are to notify their supervisor within one hour after the shift begins on the first day of an absence or partial absence, if an authorized absence has not been
previously arranged. If the supervisor cannot be reached, the absence is to be reported to Human Resources. The information provided will include the following:

a. Employee’s name and department;
b. Supervisor’s name;
c. Reason for absence or lateness;
d. Expected return hour and date.
COMPANY BULLETIN BOARDS

Bulletin boards may be established and maintained by administrative personnel at all corporate facilities for the purpose of informing all employees of government regulations, employee and management announcements affecting employees. All other use of company bulletin boards are prohibited without the permission of the responsible Division President or Vice President/General Manager or the Vice Chairman/President.
CONFLICT OF INTEREST

Business between EPS, its customers, and its suppliers of property and services, shall be conducted at “arm’s length”. The interests and integrity of EPS and its employees must be protected by the prevention or elimination of any conflicts of interest. Employees shall conduct themselves so as to avoid conflicts of interest, and shall cooperate in resolving potential conflict of interest questions.

Guidelines
A conflict of interest exists when an employee’s judgment or decision on behalf of EPS could be subject to adverse influence or temptation by reasons of relations, obligations or commitments, financial or otherwise, to another organization, enterprise or person.

When a conflict of interest is believed to exist, the employee involved should notify his or her supervisor, who should review the matter with higher management in all significant cases. After determination that conflict of interest exists, prompt action must be taken to eliminate or reduce it to acceptable dimensions.

a. Any employee who believes that he or she may have a conflict of interest has a duty to inform management.

b. When management believes that a conflict of interest may exist in the concerned. If the belief remains, higher management should be consulted.

After receiving notice of a possible conflict of interest, the appropriate managers shall complete fact-finding as necessary, and make a determination as to the existence of a conflict, and the appropriate corrective actions.

a. If no conflict is found, the responsible Division President or Vice President/General Manager shall make and file a record of the circumstances together with the resultant decision.

b. If a conflict is believed to exist, the responsible Division President or Vice President/General Manager shall discuss the situation with the employee concerned and, if necessary, recommend corrective action.
ETHICAL BUSINESS RELATIONSHIPS

Employees and other representatives of EPS will be guided by the highest standards of ethical and moral conduct in EPS business relationships. These relationships include interactions with customers and suppliers of material, facilities and services, as well as business relationships with other members of the business and financial community.

Guidelines
Except for business conferences, meals, advertising novelties, modest entertainment and/or sporting events and the like, employees shall not accept any gratuity or accommodations from individuals, corporations, or other entities that have past, present or future business relationships with EPS. A polite but firm refusal of such offers shall be made in order to contribute to sound business relations, and to ensure that all decisions and actions regarding EPS business are based upon proper business considerations, and are not influenced by personal obligations. The EPS Corporate Compliance Officer should be consulted in the event there are any questions concerning a gift or gratuity.

EPS requires honest, straightforward, fully informative and non-deceptive marketing of its products and services. It is in the best interests of customers and EPS that customers fully understand the products and services offered by EPS, the products and services that will be provided when products are ordered and the financial consequences for the customers.

Confidential Information and Trade Secrets of EPS and Others
EPS employees deal on a daily basis with confidential information about the company. This information includes business plans, marketing and pricing information, customer lists, and plans for new businesses and ventures. EPS’ business could be damaged if this information were disclosed to competitors or to anyone else outside the company.

Some EPS employees from time to time are provided with confidential information from suppliers and EPS’ customers. This information is disclosed to EPS on the understanding that it remains confidential and it is not to be disclosed to EPS’ competitors, to the customers’ or suppliers’ competitors, or to anyone else outside the company. Conversely, any customer to whom confidential information is disclosed will be informed that the information so disclosed is confidential and attempts will be made to obtain written confirmation of this expectation.
Just as EPS places great importance in its own confidential information and that of its customers and suppliers, it respects the rights of its competitors to maintain the confidentiality of their confidential information.

Each EPS employee should assume that all information about EPS and its business is confidential (except in those circumstances where EPS has publicly disclosed the information or where the employee can otherwise verify that the information is publicly known). Each EPS employee is obliged, during and after his or her employment, to hold all such confidential information in confidence, to refrain from disclosing any such information to any person outside the company without the company’s prior consent, and to refrain from using such information for any purpose other than, the performance of his or her duties to the company.

Similarly, each EPS employee should assume that all information disclosed to EPS by its customers and suppliers is confidential (except in those circumstances where the customer or supplier has explicitly consented to its disclosure or the employee can otherwise verify that the information is publicly known). Each EPS employee is obliged, during and after his or her employment, to hold all such confidential information in confidence, to refrain from disclosing any such information to any person outside the company without the company’s prior consent, and to refrain from using such information for any purpose other than the performance of his or her duties to the company.

No EPS employee should use any improper means to obtain confidential information from any competitor. Under no circumstances should any EPS employee make any payment to, or any arrangement with, an employee or representative of a competitor in order to obtain information, plans, or other secret or confidential information from any competitor. Any failure to follow this policy can result in severe discipline, including but not limited to, termination.

All employees shall sign a Confidential Nondisclosure Agreement. Upon termination of employment, each employee will confirm in writing the duties and obligations imposed upon the terminated employee pursuant to the provisions of the Confidential Nondisclosure Agreement. Unless authorized, employees shall not disclose confidential information concerning bids, specifications, product features, financial data, or any other information of a confidential nature, to persons outside of EPS.

Persons acting on behalf of EPS shall do so in compliance with all Local, State and Federal laws.
PROTECTION OF INTELLECTUAL PROPERTY OF OTHERS

It is unlawful and against EPS policy to infringe upon the intellectual property rights of others. Following are examples of activities that have been found unlawful under the circumstances in which they occurred, and steps employees should take to remain in compliance. Because intellectual property laws are complex and evolving, questions should be resolved with help from EPS’ legal counsel.

- Disclosing to others outside of EPS any information received in confidence from a supplier or contractor. Responsible employees should review contracts and circumstances under which the Company received the information to determine whether a nondisclosure agreement applies or an implied obligation of confidentiality exists.

- Copying all or parts of copyrighted newsletters for distribution to others. Route the original, purchase multiple subscriptions, or contact the publisher for permission to copy.

- Contact the Information Technology Department at the corporate office for important additional policies protecting the intellectual property of others with respect to the use of EPS computers and equipment.
POLICY ON DEALINGS ABROAD

Dealings with Foreign Officials
EPS does not permit employees to pay, or to promise to pay or authorize anyone else to pay money or to give anything of value to either an officer of a foreign government, including state owned enterprises, or a foreign political party or party official or candidate for office, or where such a payment is made to influence official conduct in an effort to help EPS secure or keep business. This prohibition applies even where the local custom may be different, as well as to the payment or promise of payment to any other person where it is known that all or some of the payment will be used to influence official conduct as described above.

EPS prohibits the giving, directly or indirectly, of money or anything of value to foreign politicians and party officials to avoid the appearance of a violation of the Foreign Corrupt Practices Act, which makes such conduct a crime in the United States. Bribery is a crime in all foreign countries. Some payments are, however, permitted under U.S. law, such as “facilitating payments” to secure routine permits or to provide mail delivery. In such cases, and where the written laws of the foreign country make clear that such payments are lawful, such a payment is not prohibited by EPS’ Policy on Dealings Abroad. Likewise, reasonable and genuine expenses, such as hotel and meal expenses, incurred to provide or demonstrate a product or to aid in the performance of a contract, are not prohibited.

Any EPS employee who has a question about the propriety of his or her conduct under this policy should seek advice from the EPS Corporate Compliance Officer.

Export Controls
EPS products and services may from time to time cross national boundaries directly from us to our customers. Exporting, therefore, is an essential link in the chain of events as we ship EPS products outside the United States.

The United States and other nations have laws which regulate the export of products and technology based upon considerations of national security and foreign policy. The federal export laws apply to all EPS products worldwide if they contain United States parts or are based upon U.S. technology. Since international operations represent a portion of our business, compliance with federal export regulations, as well as with those of each country in which we operate, is essential to the continued well-being of our company.
The export laws are complex and are governed by different agencies within the United States Government, including the State Department, the Treasury Department and the Commerce Department. These rules may involve what you may export, to what countries you may export and to which end user you may export. Export licenses may be required from the various agencies involved.

If you know or have reason to believe that the customer intends to export without the necessary license or authorization, you cannot make the sale. It is also essential to maintain complete records of every transaction, both of domestic sales and exports.

There are severe penalties for violating export laws. These penalties could have a severe effect on the individual involved and result in significant disruption to EPS’ business operations.

If you have any question about export issues, please contact the Contracts Department and/or the Compliance Officer.
TRUTH IN REPORTS AND RECORDS

EPS employees may not create, maintain or submit records, reports or statements that are inaccurate, false or misleading. All EPS employees have an absolute and affirmative duty to be sure that any statement or representation made on EPS’ behalf is truthful and accurate. This is especially critical with regard to any statement, letter or document which is directed to, or may be relied upon by, any governmental agency.

Truth in Reports and Records Procedures
Falsification in records, submissions or statements, is the type of conduct most likely to give rise to violations of the law, as well as the appearance of impropriety. This is the type of unethical conduct most likely to lead to disciplinary measures. Individuals who fill out or who are responsible for, or who make statements to governmental or regulatory agencies, must exercise care to ensure that such records or statements are accurate and complete. In this regard, it is always preferable to be truthful and to admit ignorance when that is the case, rather than to speculate. Similarly, it is better to check facts and be certain they are accurate rather than to write letters or reports based on guesses or assumptions.

Maintaining the integrity and truthfulness of its reports to government agencies is critical to the success of EPS. Any EPS employee who fills out or makes an inaccurate report, whether the inaccuracy is deliberate or the result of an innocent mistake is subject to severe discipline, including immediate termination.

It is the policy of EPS to ensure that all time expended by EPS employees be recorded accurately and bills to the customer should be based upon such time actually expended on the project at the specified contract rates. If an employee continues to have questions about recording time entries, the supervisor, Finance Department and/or the Compliance Officer should be contacted.

Similarly, EPS employees shall not submit any claim for reimbursement of expenses not actually incurred. Furthermore, EPS employees shall not submit any claim for reimbursement of expenses in excess of the amount actually incurred unless reimbursement is based on a per diem rate approved in advance by applicable policy or by the appropriate government representative and the employees’ direct supervisor.
ALCOHOL AND DRUG ABUSE PROGRAM

Purpose
To establish EPS’ policy and procedures to be used in addressing the problems of use, possession, manufacture, purchase, attempted purchase, transfer, attempted sale, or sale of, narcotics, alcohol, drugs or prescription medication without a prescription, while on EPS property, customer premises, in EPS vehicles or while performing an assignment.

Scope
This policy applies to all EPS employees, EPS facilities, EPS Vehicles (owned, leased or rented), and Customer Premises. Implementation of this policy is subject to restrictions contained in all local, state and federal laws.

Policy
It is EPS policy to provide a workplace free of alcohol and drugs, and to take reasonable measures to ensure that employee alcohol or drug use does not jeopardize the success of its operations, nor otherwise affect EPS, its employees, or its customers.

EPS recognizes that a successful approach to the problems inherits to alcohol or drug use requires a combination of education, counseling, assistance, deterrents and discipline. A compassionate and consistent approach is an integral component of this policy. Confidentiality, consistent with legal, safety and security considerations, is also fundamental to this policy.

Nothing in this policy is to be construed as a guarantee of employment for any period of time, including but not limited to the time an employee is participating in the EPS’ EAP or drug testing program.

Employee Assistance and Drug-Free Awareness
Early recognition and treatment for alcohol or drug abuse are important for successful rehabilitation and for reduced personal, family, workplace and social disruption. EPS encourages the earliest possible diagnosis and treatment for alcohol or drug use. Employees are encouraged to voluntarily seek help in overcoming drug or alcohol problems before becoming subject to discipline and/or termination under this or other EPS policies. Employees who voluntarily request assistance may do so without jeopardizing their continued employment provided their request is timely.
made, and provided they strictly adhere to the terms of their treatment and counseling program.

Information and sources of help for drug/alcohol problems is available through the Human Resources department

Rules of Conduct
The following Rules of Conduct apply to all employees. Violation of such rules subjects the employee to disciplinary action, up to and including discharge.

A. The use, possession, manufacture, purchase, attempted purchase, transfer, attempted sale, or sale of, narcotics, alcohol, drugs, or prescription medication without a prescription while on EPS property, customer premises, in EPS vehicles or while performing an assignment is a violation of policy and may result in disciplinary action, up to and including discharge.

B. Being impaired or under the influence of legal or illegal drugs or alcohol away from the company or customer premises, if such impairment or influence adversely affects the employee’s work performance, the safety of the employee or of others, or puts at risk the Company’s reputation.

C. The presence of any detectable amount of prohibited substances in the employee’s system while at work, while on the premises of the company or its customers, or while on company business. “Prohibited substances” include illegal drugs, alcohol, or prescription drugs not taken in accordance with a prescription given to the employee.

D. Employees, who believe or have been informed that their use of a legal drug may present a safety risk, are to report such drug use to their supervisor, to ensure the safety of themselves, other employees, and EPS property including vehicles. EPS will not allow any employee to perform their duties while taking prescribed drugs that are adversely affecting the employee’s ability to safely and effectively perform their job duties. Employees taking a prescribed medication must carry it in the container labeled by a licensed pharmacist or be prepared to produce this if asked.

E. Employees who have been convicted of a criminal drug violation must notify their supervisor within 5 calendar days.

Any illegal drugs or drug paraphernalia will be turned over to an appropriate law enforcement agency and may result in criminal prosecution.
Being subject to the effects of alcohol or an illegal drug does not excuse an employee's misconduct, which is in violation of policy. For example, an assault committed while subject to the effects of alcohol or an illegal drug will subject the employee to disciplinary action, up to and including discharge because of the misconduct.

**Procedures**

**Education**

A. The EPS Alcohol and Drug Abuse Policy and Program is available for review through the Deltek Time and Collection system under “EPS Manual”.

B. Management and supervisors are to be aware of the following:

1. Immediately notify HR of concerns. HR will provide direction on how to proceed.
2. Employee Assistance Program (EAP) Policies and procedures related to employees who appear to be subject to the effects of alcohol and/or drugs;
3. Alcohol and drug testing policy, rules, and procedures.
4. Safety aspects of alcohol or drug problems in both work and social environments.

**Employee Assistance Programs (EAP)**

EPS offers an Employee Assistance Program (EAP) to assess and refer employees, to appropriate education, prevention, counseling, and treatment or rehabilitation services for such concerns as alcohol or drug abuse, marital, family or child difficulties, work stress or financial matters.

A. It is the responsibility of each employee to seek assistance from EPS before the employee’s alcohol or drug problems lead to disciplinary action, up to and including discharge. Once a violation of Company policy has been identified, subsequent use of the EAP will not lessen disciplinary action.

B. An employee's decision to seek voluntary help is not to be used as a basis for disciplinary action against the employee.

C. In order for an employee's decision to utilize the EAP to be considered voluntary, the employee must seek to utilize the EAP prior to a referral to the
designated collection site for purposes of obtaining a breath alcohol test or a drug test, which subsequently tests positive.

D. The confidentiality of individuals utilizing the EAP is to be protected within the limits of the law, consistent with safety and national security concerns.

Inspections for Alcohol or Drugs

Inspections

A. EPS may require individuals to submit to special inspections of their personal lockers, purses, lunch containers, briefcases, desks, file cabinets, or other containers or personal vehicles when on EPS property, or work locations. Refusal to be submitted to such inspections may be a condition for immediate suspension without pay and subjects to disciplinary action, up to and including discharge.

B. Non-employees who refuse to permit an inspection are to be informed that this is a requirement of individuals allowed on EPS property or work sites. Continued failure to submit to an inspection will result in their expulsion from EPS property and their inability to enter the property for any reason in the future.

Alcohol and Drug Testing

EPS may conduct drug testing under any of the following circumstances.

Pre-employment Testing:

A. All applicants being considered for employment may be required to test for illegal drugs. An alcohol test may be conducted when there is reason to believe that the applicant is under the influence of alcohol.

B. Applicants who test positive for alcohol or illegal drugs or, who state on their employment application, or in any other fashion they have used illegal drugs in the preceding 12 months, may be denied employment.

C. An applicant who declines to undergo the alcohol and drug test may be denied employment and may not be allowed to re-apply/re-test in the future.

Random Testing
Employees may be selected at random for drug testing at any interval determined by the company.

**Reasonable Suspicion Testing**

The company may ask an employee to submit to a drug test at any time it feels that the employee may be under the influence of drugs or alcohol, including, but not limited to, the following circumstances: evidence of drugs or alcohol on or about the employee’s person or in the vicinity, unusual conduct on the employee’s part that suggest impairment or influence of drugs or alcohol, negative performance patterns, or excessive and unexplained absenteeism or tardiness.

Under no circumstances will the employee be allowed to drive himself or herself to the testing facility. A member of supervision/management must escort the employee; the supervisor/manager will make arrangements for the employee to be transported home.

**Post-Accident Testing**

Any employee involved in an on-the-job accident or injury under circumstances that suggest possible use or influence of drugs or alcohol in the accident or injury event may be asked to submit to a drug and/or alcohol test. The employee must comply with any such required testing. “Involved in an on-the-job accident or injury” means not only the one who was injured, but also any employee who potentially contributed to the accident or injury event in any way.

Under no circumstances will the employee be allowed to drive himself or herself to the testing facility. A member of supervision/management must escort the employee; the supervisor/manager will make arrangements for the employee to be transported home.

**Other**

Employees may be required to undergo testing periodically per customer/contract requirements.

Employees may be required to undergo testing as part of a program of counseling or rehabilitation

Employees may be tested as part of a voluntary employee drug testing program.

If an employee is tested for drugs or alcohol outside of the employment context and the results indicate a violation of this policy, the employee may be subject to appropriate disciplinary action, up to and possibly including discharge from
employment. In such a case, the employee will be given an opportunity to explain the circumstances prior to any final employment action becoming effective.

Compensation During Testing – Employees Only

An employee undergoing Reasonable Suspicion or Post-Accident Testing will be paid for time spent in alcohol/drug testing and then may be suspended pending the results of the drug/alcohol test. After the results of the test are received, a date/time will be scheduled to discuss the results of the test; this meeting will include a member of management/supervision, and preferably Human Resources. Should the results prove to be negative, the employee will receive backpay for the times/days of suspension.

Positive Test for Alcohol or Drugs

An employee whose alcohol or drug test is positive is considered in violation of EPS policy.

Employees who have tested positive, or otherwise violated this policy, are subject to discipline, up to and including discharge. Depending upon the circumstances and the employee’s work history/record, EPS may offer an employee who violates this policy or tests positive the opportunity to return to work on a last chance basis pursuant to mutually agreeable terms, which could include follow-up drug testing at times and frequencies determined by EPS. If the employee either does not complete their rehabilitation program or tests positive after completing the rehabilitation program, they will be subject to immediate discharge from employment.

Refusal to Consent to Action Plan Following Positive Test

The refusal of an employee whose alcohol or drug test was determined to be positive, to agree in writing, upon return to work, to any provisions of the above stated Positive Test for Alcohol or Drugs will result in the employee's discharge.

Adverse Information Report

Adverse Information Report - A report is to be filed with the Defense Investigative Services (DIS) regarding any adverse information about any employee who has, or is in the process of being considered for, a security clearance. Adverse information includes, but is not limited to, an employee's excessive use of intoxicants or any use or possession of illegal drugs. A report is to be submitted to the Industrial Security Department if (1) the results of any test are determined to be positive; (2) an employee is referred to the EAP by the Company (non-self referral); or, (3) the employee is found to be in violation of the Company's Rules of Conduct as they
relate to alcohol or illegal drugs. An Adverse Information Report may then be filed with the Defense Investigative Service.

**Company Sponsored Social Events**

Alcohol may be permitted at certain company-sponsored events. These events will be specifically authorized by the CEO or Vice Chairman/President.
HARASSMENT AND WORKPLACE VIOLENCE

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

All employees, regardless of their positions, are covered by and are expected to comply with this policy and to take appropriate measures to ensure that prohibited conduct does not occur. Appropriate disciplinary action will be taken against any employee who violates this policy. Based on the seriousness of the offense, disciplinary action may include verbal or written reprimand, suspension or termination of employment.

Prohibited Conduct Under This Policy

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

Discrimination

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

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

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

EPS prohibits harassment of any kind and will take appropriate and immediate action in response to complaints or knowledge of violations of this policy.

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

- Verbal harassment includes comments that are offensive or unwelcome regarding a person’s nationality, origin, race, color, religion, gender, sexual orientation, sexual identity, age, body, disability or other protected class, including epithets, slurs and negative stereotyping.

- Nonverbal harassment includes distribution, display or discussion of any written or graphic material that ridicules, denigrates, insults, belittles or shows hostility, aversion or disrespect toward an individual or group because of national origin, race, color, religion, age, gender, sexual orientation, pregnancy, disability, sexual identity, marital or other protected status.

Guidelines

Any employee who feels that he or she is a victim of harassment should bring the matter to the immediate attention of his or her supervisor. If, for any reason, an employee is uncomfortable in bringing such matters to the attention of his or her supervisor, the employee should bring the matter to the attention of the Human Resources Department (732-747-8277). EPS will promptly investigate all allegations of harassment in as confidential a manner as possible and take appropriate corrective action if warranted.

SEXUAL HARASSMENT

Sexual harassment can exist when an employee is subjected to unwelcome verbal or physical advances of a sexual nature and submission is a term or condition of continuing employment or when such advances interfere with an employee’s work environment. Sexual harassment may include, but is not limited to, unwelcome flirtation, verbal abuse of a sexual nature, the display of derogatory or sexually suggestive posters, cartoons, drawings or objects, or other physical or verbal conduct of a sexual nature.

Examples, though not a complete listing, of the different types of sexual harassment include: name-calling, explicit jokes or statements, comments about an employee’s
anatomy and/or dress, touching, pinching, leering, displaying sexual pictures, writings or objects, continued requests for dates, propositioning an individual, retaliatory threats or action after a negative response to a sexual advances.

Sexual harassment is illegal. Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when:

1. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment;

2. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or

3. Such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile or offensive work environment.

Violation of this policy is an extremely serious matter and may constitute cause for termination.

Guidelines
Any employee who feels that he or she is a victim of sexual harassment should bring the matter to the immediate attention of his or her supervisor. If, for any reason, an employee is uncomfortable in bringing such matters to the attention of his or her supervisor, the employee should bring the matter to the attention of the Human Resources Department (732-747-8277). EPS will promptly investigate all allegations of sexual harassment in as confidential a manner as possible and take appropriate corrective action if warranted.

WORKPLACE VIOLENCE
EPS prohibits workplace violence. EPS’ employees are expected to behave in a fashion that promotes a community free from violence, threats of violence, harassment, intimidation, and disruptive behavior of a violent or intimidating nature.

EPS will respond promptly and in accordance with this policy to violence, threats of violence, harassment, intimidation, or disruptive behavior of a threatening nature towards people or property. Complaints involving workplace violence will be given the serious attention they deserve. Individuals who violate this policy may be removed from EPS property and are subject to disciplinary and/or personnel action up to, and including, termination and/or criminal prosecution.
**Definition**

Workplace violence is defined as any actual or threatening behavior of a violent nature, as understood by a reasonable person, exhibited by employees, or others within the scope of this Policy. Examples of workplace violence include, but are not limited to:

- Intentional physical contact for the purpose of causing harm (such as slapping, punching, striking, shoving, or otherwise physically attacking a person).
- Menacing or threatening behavior (such as throwing objects, waving fists, damaging property, stalking, or otherwise acting in an aggressive manner; or, using oral or written statements specifically intended to frighten, coerce, or cause distress) where such behavior would be interpreted by a reasonable person as being evidence of intent to cause physical harm to individuals or property.
- Possessing any firearm, imitation firearm, or any components which can readily be assembled into a firearm or other weapon without specific written authorization irrespective of whether the individual possesses a valid permit to carry the firearm or a valid firearm purchaser identification card.

**Reporting Workplace Violence**

- General Reporting Responsibilities: Any employee who has been subject to workplace violence or who has witnessed workplace violence should promptly notify their appropriate supervisor or Human Resources. Additionally, employees are encouraged to report behavior that they reasonably believe poses a potential for workplace violence as defined above. It is imperative that all employees take this responsibility seriously.
- Reporting Imminent or Actual Violence: Any person experiencing or witnessing actual violence involving weapons or potential injuries should call their local Police Department emergency number or the appropriate law enforcement agencies.
- Reporting Acts of Violence Not Involving Weapons or Injuries to Persons: Any person who is the subject of, or witness to, a suspected violation of this policy should report the incident to his or her supervisor.
- Law Enforcement Agencies: All individuals who believe a crime has been committed against them have the right, and are encouraged, to report the incident to the appropriate law enforcement agency.
- False Reports: Employees who intentionally file false reports pertaining to workplace violence will be subject to disciplinary action up to, and including, termination.

**Responsibilities of Employees and Supervisors**

Employees should report workplace violence, as defined above, regardless of the relationship of the employee to the person believed to have engaged in workplace violence, to their supervisor. Recurring or persistent workplace violence that an employee believes is not being addressed satisfactorily, or violence that is, or has been, perpetrated by the employee’s supervisor, should be brought to the attention of that employee’s supervisor or Human Resources.

Employees who have obtained restraining orders are expected to notify their supervisors of any orders that list EPS locations as protected areas.

Domestic violence victims who believe the violence may extend into the workplace, or employees who believe they may be subjected to violence extending into the workplace, are encouraged to notify their supervisor. Confidentiality will be maintained to the extent possible.

Supervisors who are notified of a suspected violation of this policy are required to respond in accordance with this policy in a fair and timely manner.

Supervisors are required to contact the local police department in the event of imminent or actual violence involving weapons or potential injuries.

Supervisors are expected to inform their immediate supervisor promptly about any acts or threats of violence even if the situation has been addressed and resolved.

**Guidelines**

EPS shall maintain the confidentiality of investigations to the extent possible within the requirements of conducting reasonable investigations while ensuring the safety of members of the EPS community. EPS will act on the basis of anonymous complaints where it has a reasonable basis to believe that there has been a violation of this Policy and that the safety and well-being of EPS employees would be served by such action.

Retaliatory action against anyone acting in good faith who has made a complaint of workplace violence, who has reported witnessing workplace violence, or who has been involved in the reporting of, investigating or responding to workplace violence is a violation of this Workplace Violence Policy. It is also a violation of the Policy
to take adverse action against an employee solely on account of his/her being an actual or potential victim of workplace violence. Those found responsible for retaliatory action will be subject to discipline up to, and including, termination.

EPS provides an Employee Assistance Program (EAP). Employees are encouraged to utilize the program. For additional information on the EAP program contact Human Resources.

**HEALTH AND WORKPLACE SAFETY**

**Accidents and Injuries (Industrial & Automobile)**

When an employee becomes ill or suffers injury while at work, or is involved in an automobile accident on company time the employee's supervisor shall be promptly notified. The employee shall receive immediate medical care if necessary.

**Guidelines**

Depending on the type and the nature of the incident EPS requires that appropriate incident reports are completed and filed. Employees must contact either their manager or Human Resources for copies of the forms. The “Incident Report Checklist” outlines the forms to be filed for each type of incident and is to be used as a checklist for all accidents or injuries. The checklist must be completed to ensure that all appropriate steps are followed. The following is the list of forms:

- Incident Report Checklist
- Personal Injury Premises Accident/Incident
- Real Property Physical Damage Loss Notice
- Automobile Loss Notice
- Witness Statement/Report
- Workers Compensation Reporting Form
  - Domestic
  - Foreign

**Reporting Injuries**

When an employee injury or illness occurs on the job, the employee's supervisor shall obtain immediate necessary medical attention for the employee and shall notify Human Resources.

The employee's supervisor is expected to, in all cases of an employee occupational injury or illness, initiate a report of the accident, and submit it to Human Resources.
within 24 hours of the accident or injury. If an injury or illness requires in-patient hospitalization, results in the loss of any member of the body, or produces any serious degree of physical impairment, Human Resources must be notified immediately.

A supervisor receiving a report from an employee who is absent as a result of an occupational injury shall report such injury to Human Resources.

**Reporting Automobile Accidents**

All accidents which occur during company time or involving a company owned or rented vehicles **MUST** be promptly reported to the employee’s supervisor, no matter how minor the incident might be.

If an employee is involved in an automobile accident the employee is required to:

- Stop, help or get help for injured people.
- Call 911 or appropriate emergency response force (police, fire, medical).
- Obtain all information relating to the accident in a professional manner, including the names and addresses of any witness. Take notes.
- Cooperate fully with law officers, however, do not agree to or negotiate any promises for any injury or damages or admit liability.
- Complete a written report as soon as possible using forms provided by either your manager or Human Resources.

EPS maintains the right to require a drug and alcohol test immediately following the accident.

If the employee is a driver and is found to be negligent, the employee may be held financially responsible for the insurance deductible for each accident negligently caused by the employee.

**Medical Care**

When the employee is unable to do so, the employee's supervisor shall arrange to have an ill or injured employee transported to a medical facility, if professional treatment is required.

Authorization to return to work is required when an employee has been absent from work for five or more days due to an industrial injury or illness. The employee shall submit a physician's statement (indicating the ability of the employee to return to work) to Human Resources prior to commencing work.
Payment of Wages
Employees must contact Human Resources for information regarding payment of wages for an employee that has sustained an industrial injury during working hours.

Workers' Compensation
Workers' Compensation laws of the various states generally require that an employee immediately notify the employer of an industrial injury or claim of injury. Employees must contact their manager or Human Resources for information regarding the filing of a workers’ compensation claim. Every employer, insurance company, or doctor who attends an injured employee, normally must file an industrial injury report with the government agency that administers Workers' Compensation laws.

Safety
EPS maintains an effective safety program. Refer to the section titled “Workplace Safety Policy” for reference. All personnel, both supervisory and non-supervisory, are charged with responsibility of observing and enforcing safety regulations, and maintaining safe work conditions.

Guidelines
Facilities shall be arranged, equipment safeguarded, and employee conduct supervised in such a manner as to create a safe working environment in compliance with the laws of the state in which the facility is located.

Workers' Compensation Insurance is provided, according to law, in order to provide compensation to employees for lost time due to injuries or illness arising from employment. The entire cost of this insurance is borne by EPS.

Employees who violate established safety regulations may be subject to disciplinary action.
EMERGENCY RESPONSE POLICY

This Policy is established to ensure the safety of EPS personnel in the event of an emergency such as fire or natural disaster.

Emergency Escape Plan

Each EPS facility shall establish an Emergency Escape Plan. The Emergency Escape Plan should provide for the assignment of routes to be followed and exits to be utilized for each area of the facility in order to insure the safe and orderly escape of all personnel at the facility. The senior manager at each EPS Facility shall submit an EMERGENCY FACILITY ESCAPE PLAN to the EPS Director of Quality Assurance. The Plan shall be reviewed annually and updated as required. Upon establishment of the Emergency Escape Plan, the Plan should be posted in the facility at places where it can be easily referenced if an emergency occurs.

The ranking member of management for each department/division at the facility shall be responsible for assuring employees (and guests, if applicable) of their department/division exit during an Emergency Escape. If necessary, special care should be take to assure employees (and guests, if applicable) who have disabilities are assisted during an Emergency Escape. When it is believed that all employees (and guests, if applicable) of the department/division have exited the facility, the ranking member of the department/division management will perform a “head count” to verify the same. If it is believed that all individuals have not exited the facility this information should immediately be reported to appropriate Fire, Emergency Medical Services (EMS) and Police should be contacted for rescue. EPS employees should not attempt to re-enter any facility for a rescue unless the EPS employee is currently trained and fully qualified in rescue procedures (e.g. volunteer firefighter, volunteer EMS), and then only if the EPS employee has the necessary protective gear required under the emergency circumstances (e.g. fire turnout gear, breathing apparatus, etc.).

If any injury or illness occurs to any person by reason of the emergency, EPS employees should not attempt to provide medical treatment unless the EPS employee is currently trained and fully qualified in rescue procedures (e.g. volunteer EMS), and the only if the EPS employee follows Center For Disease Control protective guidelines with respect to protection from exposure to disease and blood borne pathogens. If no qualified medically trained persons are available to assist injured or ill persons, efforts should be made to assist the persons in remaining calm and stable in order to minimize further injury.
EMERGENCY ESCAPE DRILLS

Each EPS facility should hold Emergency Escape drills at least twice per year. At the conclusion of each drill the Emergency Escape Plan will be re-evaluated and any deficiencies or areas in need of improvement brought to the attention of senior management so that appropriate recommendations may be made to improve the plan. If a change occurs to the Emergency Escape Plan additional Emergency Escape drills should be scheduled.

Senior management at all EPS facilities should review the Emergency Response Policy with a qualified firefighter, EMS or police officer at least once per year. This may be accomplished during routine fire inspections in order to minimize expense.
FIRE PREVENTION PLAN

Senior management at all EPS facilities should identify all potential fire hazards at least twice per year, except for shipping, receiving and operations which shall do so on an ongoing basis. Whenever potential fire hazards are identified proper mitigation procedures should immediately be implemented (e.g. special handling or storage instructions etc.). Senior management should communicate the mitigation procedures to all employees who might be affected by the hazard in person and by e-mail. A copy of the Fire Prevention Plan should be kept at the facility and a copy sent to the Director of Quality Assurance.

Housekeeping/maintenance staff should empty all waste receptacles and remove the waste from the facility in order to eliminate potential fuel sources in the event a fire occurs. All cleaning solutions should be kept in the maintenance closet and stored in accordance with manufactures recommendations potential ignition sources should be kept a safe distance from potential ignition sources.

All applicable state and local fire code regulations should be followed, including installation and servicing of fire suppression devices (e.g. fire extinguishers).
CONFINED SPACES POLICY

EPS provides its employees with confined space entry training in accordance with applicable OSHA regulations.

Whenever a Hazard Assessment performed should identify that a task will involve a confined space entry will be necessary the ranking member of management, the program manager or site supervisor, will assure that employees follow applicable OSHA confined space entry guidelines. If the Hazard Assessment determines risks are present with respect to hazardous atmosphere, engulfment or other recognized dangers the ranking member of management, the program manager or site supervisor, will assure that persons entering such space are qualified on the necessary personal protective equipment (PPE) to be utilized. The ranking member of management, the program manager or site supervisor, will assure that proper signs are posted warning of the dangers; and will assure that the confined space entrant and the confined space attendant strictly follow OSHA guidelines for communication, monitoring, emergency procedures and non-entry rescue if necessary an if applicable.

In general, EPS employees should not be utilized in confined space entries wherein hazardous atmosphere, engulfment or other serious risks are present. In such instances wherein the risks identified in the Hazard Assessment indicates that serious risks are present the ranking member of management, the project manager or site supervisor should seek assistance of third parties who are qualified to perform the confined space task. In no event shall EPS employees be utilized for confined space entry unless both the confined space entrant and the confined space attendant are fully qualified for such risks and possess whatever necessary medical clearances needed for PPE usage.

Purpose & Scope

This policy provides procedures for the safe entry and work practices in confined spaces. The policy applies to all EPS employees who enter confined spaces.

Training

All employees who enter, attend, or supervise employees entering confined spaces will be trained. New hires that will participate in confined space entry will be trained prior to entering a confined space.
Hazards of Confined Spaces

Confined spaces can be hazardous for several reasons:

a. Hazardous atmospheres - the nature of many confined spaces can cause them to have poor atmospheres such as a lack of oxygen, flammable gases, toxic gases, etc.

b. Engulfment / Entrapment - the space has the potential for a material in the space to collapse and trap or bury the employee inside of the confined space.

c. Restricted Entry - spaces are not made for continuous occupancy by humans and may have limited entry and exit places.

d. Occupational Hazards - occupational hazards are amplified in confined spaces. Noises are louder because they cannot escape into the atmosphere. Heat builds up quickly and can lead to heat exhaustion.

Proper precautions must be taken to address these and other potential hazards of confined spaces. There are two types of confined spaces based on these hazards.

Confined Spaces

A confined space is a space large enough and so configured that an employee can enter and perform assigned work; and has limited or restricted means for entry or exit (for example, tanks, vessels, silos, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry.); and is not designed for continuous employee occupancy.

There are two types of confined spaces:

1. Non-Permit Required Confined Space - is a space that meets the definition of a confined space but does not contain or, with respect to atmospheric hazards, have the potential to contain any hazard capable of causing death or serious physical harm.

2. Permit Required Confined Space - this is a confined space that meets the definition of a confined space but has one or more of the following characteristics:
   a. Contains or has a potential to contain a hazardous atmosphere;
   b. Contains a material that has the potential for engulfing an entrant;
c. Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross-section; or

d. Contains any other recognized serious safety or health hazard.

**Entry Procedures for Confined Spaces**

1. Prior to entering any confined space:
   a. Any EPS employee who is an entrant, attendant, or supervisor will have attended confined space training within the past year.

   b. The EPS OSHA trained site supervisor should be contacted. The phone number is 732-747-8277.

2. Entering non-permit required spaces:
   a. Unless the confined space is clearly marked as a non-permit required confined space, it will be treated as a permit required confined space until designated otherwise by the university environmental health & safety officer.

   b. Prior to entry the EPS employees who will enter the non-permit required confined space must receive approval to do so from the environmental health & safety officer and also from their supervisor.

   c. Prior to entry any equipment operating in the confined space should be shut down and locked out / tagged out according to EPS/GSA/US GEOLOGICAL OFFICE policy.

   d. Prior to entry a trained attendant (stand-by person) should be in place and ready to assist entrants if needed.

   e. A trained supervisor should approve the confined space for entry after ensuring that all hazards are under control and the space is safe for entry.

   f. EPS employees may enter the confined space and perform required work. The attendant must be able to see and communicate with the employees the entire time they are in the confined space. The attendant has the authority to order the workers out of the space if he loses sight of them, loses communication, or feels that the employees are in danger.

   g. Once work is completed close entry way to the confined space. Remove locks and tags and reenergize equipment.

3. Entering permit required confined spaces:
a. Prior to entry a confined space entry permit must be completed. The permit is attached to this policy and includes checks for:

1) Prior to opening the confined space all associated processes should be shut down and locked out and tagged out.
2) Hazardous Atmosphere - air will be tested to ensure that the atmosphere is within OSHA limits for human occupancy. A calibrated confined space test meter will be used to test the atmosphere prior to entry. To be safe to enter the following must be met:
   **Oxygen** - level must be between 19.5% through 23.5%
   **LFL** - flammable gases, vapors, or mists must be below 10% of LFL
   **Toxic Gases** - no presence of toxic gases is allowed.
3) If any of these conditions exist do not enter the confined space. Mechanical ventilation may be used to correct hazardous atmospheres.
4) Entrapment / Engulfment - if the hazard for entrapment or engulfment exists proper blocking procedures must be used to isolate the hazard.
5) Rescue equipment should be present and on site ready to be employed.
6) Emergency communication equipment should be at the site and be at a minimum a two-way radio.
7) A trained attendant (standby person) must be stationed at the site and trained in the duties of the attendant. Name must be filled in on the permit.
8) All entrants must be trained in the duties of the entrant. Entrants' names must be filled in on the permit.
9) Supervisor must review, sign, and approve of the entry prior to employees entering the space.
10) The completed and signed confined space permit must be posted at the entrance of the confined space.

NOTE: EPS employees who enter the confined space have a right to review and observe all checks on the confined space prior to entering the space.

b. Entering the confined space:

1) Once the confined space permit is fully executed the authorized entrants may enter the confined space
2) The attendant should retest the air periodically while the employees are in the confined space to ensure that atmospheric conditions are acceptable. If air tests are not acceptable attendant will order entrants out of the confined space.

3) The authorized entrants must stay in touch with the attendant by sight and verbal communication throughout the work. If any condition inhibits this communication, then the attendant will order the entrants to exit the confined space.

4) Once employees exit the space, the permit should be canceled. Even if the employees are taking a break or lunch a new permit will be completed for each re-entry. The air will be tested each time before re-entry and the permit completely filled out.

c. Once Work in the Confined Space is completed:

1) Ensure that all workers and all equipment is out of the confined space. Remove any ventilation devices. Close the access cover to the confined space.

2) Remove locks and tags from devices locked out. Reenergize this equipment.

3) Return all canceled permits to the GSA/US GEOLOGICAL OFFICE/EPS environmental health & safety officer.

Confined spaces are dangerous work environments and should always be treated with extreme caution. This policy attempts to provide safe procedures for entry and work in confined spaces, however, there are some confined spaces that are more dangerous and may not be appropriate for any entry. Before entering these spaces, the EPS OSHA trained site supervisor must approve that entry by employees will be allowed.

**Applicable Regulations**

The EPS confined space entry policy is based on regulations of the Occupational Safety and Health Administration (OSHA). Specific regulations on confined spaces are found in 29 CFR 1910.146.
HAZARD ASSESSMENT POLICY

It is the responsibility of the ranking member of management for each EPS facility to assure that a Hazard Assessment is performed at his/her facility. The Hazard Assessment should identify if: (a) any hazards are present; (b) any hazards are likely to be present in the foreseeable future; and (c) personal protective equipment (PPE) can be used to help protect employees from the potential hazard. The Hazard Assessment should be thorough and should be utilized to examine a variety of risks, including: (1) identification of hazards due to workplace activities, (2) hazards associated with workplace equipment or machinery; (3) hazards which may exist due to the presence of materials or supplies used in the facilities; and hazards which may be encountered by reason of anticipated future workplace activities.

It is the responsibility of the project manager to assure that a Hazard Assessment is performed at any off site facility where EPS employees are to perform work. If the project manager is unable to participate in a Hazard Assessment the project manager should designate a site supervisor to assure that a Hazard Assessment occurs. In general the Hazard Assessment will be performed as part of a site survey in anticipation of submission of a bid or proposal so that the site owner can be questioned about possible site conditions. In such instances when a Hazard Assessment cannot be performed prior to bid submission the program manager or site supervisor shall perform the Hazard Assessment prior to the commencement of such work at an offsite facility.

The ranking member of management for each EPS facility shall communicate the results of the hazard assessment at his/her facility to the management of each department/division, who in turn will communicate this information to his or her staff. The program manager or site supervisor of an offsite facility shall communicate the results of all off site hazard assessments to his or her staff prior to commencement of work at such off site facility.

In addition to communicating results of Hazard Assessments to staff, whenever a Hazard Assessment identifies hazards that are present or are likely to be present at an EPS facility, the ranking member of management will assure that the following action is taken. First, the ranking member of management will assure that the staff is properly trained in identifying and mitigating potential risks associated with the hazard(s). Second, the ranking member of management will determine whether the risks identified in the Hazard Assessment warrant assistance from third parties who are more qualified than EPS in mitigation and assistance. Third, if potential risks associated with the hazard(s) are determined to be manageable by EPS employees,
the ranking member of management will assure that PPE is provided to staff identified as being at risk. Fourth, all employees will be provided an acknowledgment form and will acknowledge having been informed of the hazard(s).

If a Hazard Assessment performed at an offsite location should identify hazards that are present or are likely to be present at an EPS facility, the program manager will follow a similar analysis as noted above, except that the program manager will also take additional steps to determine whether the hazards give rise to a claim for additional compensation for the task and if appropriate whether EPS should avoid the tasks.

In no event shall EPS staff be utilized for activities requiring respirators unless the employee has been successfully evaluated and cleared for such use by qualified medical persons.
LOCKOUT / TAGOUT POLICY

This policy must be followed whenever EPS employees are working with, performing maintenance, or servicing powered machinery, electrical equipment, or any item wherein stored energy can result in a hazard to the employee. It is the responsibility of the ranking member of management for each EPS facility to assure that a Hazard Assessment is performed on all powered machinery, electrical equipment, or any items wherein stored energy can result in such hazards to EPS employees. It is the responsibility of the ranking member of management for each EPS facility to assure that all EPS employees working at his or her facility follow this policy.

This procedure establishes the minimum requirements for the lockout of energy isolating devices whenever maintenance or servicing is done powered machinery, electrical equipment, or any item wherein stored energy can result in a hazard to the employee. It shall be used to ensure that the machine or equipment is stopped, isolated from all potentially hazardous energy sources and locked out before EPS employees perform any servicing or maintenance where the unexpected activation or start-up of the machine or equipment or release of stored energy could cause injury.

All EPS employees are required to comply with the restrictions and limitations imposed upon them during the use of lockout. The authorized employees are required to perform the lockout in accordance with this procedure. All EPS employees upon observing a machine or piece of equipment is locked out to perform servicing or maintenance shall not attempt to start, energize, or use the machine or equipment.

1. Notify all affected employees that servicing or maintenance is required on a machine or equipment and that the machine or equipment must be shut down and locked out to perform the servicing or maintenance.

2. The authorized employee shall refer to the company procedure and the manufacturer's service manual to identify the type and magnitude of the energy that the machine or equipment utilizes. The authorized employee shall understand the hazards of the energy, and shall know the methods to control the energy prior to performance of any servicing or maintenance.

3. If the machine or equipment is operating, it must be shut down by the normal stopping procedure (e.g. depress the stop button, open switch, close valve, etc.).
4. The machine or equipment must be de-activated, the energy source isolated and the machine or equipment is isolated from the energy source(s) by an appropriate isolating device.

5. The energy isolating device(s) (i.e. the lockout or tag out device(s)), must be assigned to the individual who will be responsible for the maintenance or servicing. The Director of Security will issue such individual a lockout or tag out device(s) or key(s) as deemed necessary or appropriate.

6. In the event that the maintenance or servicing exceeds the time of the work shift for the individual performing the maintenance or servicing, such individual shall assure that the lockout or tag out device is properly in place at the end of his or her work shift. Such individual shall return the key(s) to the Director of Security. The Director of Security will take appropriate care to notify employees of any following work shift of the ongoing maintenance or servicing to the machinery or equipment. The Director of Security will take precautions to assure that the machinery or equipment does not pose a danger to such employees. The individual responsible for the maintenance or servicing will obtain the key(s) from the Director of Security at the commencement of the following work shift.

7. Stored or residual energy (e.g. such as that in capacitors, springs, elevated machine members, rotating flywheels, hydraulic systems, and air, gas, steam or water pressure, etc.), must be dissipated or restrained by methods which will assure that such energy is not released such as grounding, repositioning, blocking, bleeding down, etc.

8. The individual who will be responsible for the maintenance or servicing will ensure that the equipment is disconnected from the energy source(s) by first checking that no personnel are exposed, then verify the isolation of the machinery or equipment by operating the normal operating control(s) or by testing to make certain the machinery or equipment will not operate.

**CAUTION.** The employee must return all operating control(s) to neutral or “off” position after verifying the isolation of the of the machinery or equipment to assure that the machinery is not unexpectedly activated when reconnected to the energy source.

9. The machinery or equipment is now locked out.
"Restoring Equipment to Service." When the servicing or maintenance is completed and the machinery or equipment is ready to return to normal operating condition, the following steps shall be taken.

a. The employee must check the machine or equipment and the immediate area around the machinery or equipment to ensure that nonessential items have been removed and that the machinery or equipment components are operationally intact.

b. The employee must check the work area to ensure that all employees have been safely positioned or removed from the area.

c. The employee must verify that all operating control(s) are in the neutral or “off” position.

d. The employee must then remove the lockout devices and re-energize the machine or equipment.

Note: The removal of some forms of blocking may require re-activation of the machine before safe removal. The employee should consult the manufacturer’s operating manual and exercise due caution in such instances.

e. The employee must notify all other employees affected that the servicing or maintenance is completed and the machine or equipment is ready for use.

f. The employee must then return the lockout device(s) and key(s) to the Director of Security.
EMPLOYEE PERSONAL PROTECTIVE EQUIPMENT SAFETY POLICY

EPS provides its employees with personal protective equipment (PPE) in accordance with applicable OSHA and ANSI standards. EPS provides training to its employees on the proper usage of PPE. Each employee is responsible for assuring that his or her PPE is used and maintained in a sanitary and reliable condition.

Unless a Hazard Assessment should determine that there is no potential hazard, all EPS employees who install telephone systems or security systems must, at a minimum, wear eye protection. Additionally, any employee who may be required to operate power tools or power equipment or may be required to work in an environment where such equipment is in use must wear appropriate PPE in accordance with the manufacturer's safety recommendations. It is the responsibility of all program managers and site supervisors to ensure that employees comply with this policy.

In general, EPS employees should not be utilized for tasks wherein respirators are required. In such instances wherein the risks identified in the Hazard Assessment indicates that respirators are required, the program manager or site supervisor should seek assistance of third parties that are qualified to perform the task. EPS employees should not be utilized for tasks wherein respirators are required unless: (1) the employee has been successfully evaluated and cleared for such use by qualified medical persons; (2) the employee is fully trained on the usage of the PPE; (3) the PPE is fit tested; (3) the employee is fully trained on the cleaning, maintenance and disposal of the PPE.

EPS employees should not decorate, repair or in any way alter PPE unless the manufacturer specifically authorizes such decoration, repair or alteration.
WORKPLACE SAFETY POLICY

Aisles, Passage Ways, Ingress and Egress

All aisles and passageways in EPS facilities must be kept clear, unobstructed and in a safe condition at all times. All points of ingress and egress into and out of EPS facilities must be maintained so as to ensure safe efficient passage into and out of EPS facilities.

All aisles, passageways, points of ingress and egress in or around EPS facilities, and must be inspected at least once per month. The inspection of the aisles and passageways should include an inspection of all safety equipment (e.g. ramps, handrails, automatic door closure devices, smoke detectors, exit signs, etc.) If the inspection reveals any obstructions or any potentially unsafe condition, the obstruction or unsafe condition must be corrected. The results of the inspection will be noted an inspection report. The inspection report will be filed with the Director of Quality Assurance. Any concerns which are noted during the inspection (e.g. burned out lights, aisle obstructions, etc.,) are to be prioritized based upon the degree of safety and the estimated time for remedying the condition and then corrected in the order of the priority. If any serious concerns with respect to health or safety are discovered during the inspection and the condition cannot be immediately corrected, appropriate warnings should be posted and the condition should be immediately brought to the attention of senior management.

Ladders and Work Platforms

No ladder or work platform will be purchased, rented or used by EPS personnel unless the ladder meets or exceeds applicable OSHA or ANSI standards. Evidence of compliance with the OSHA or ANSI standard must appear on the ladder or work platform prior to placing the unit into service. (In general, information contained on the product reflecting manufacturing information and serial numbers will also evidence OSHA or ANSI standards have been met in the manufacturing process and this will be acceptable evidence.)

All ladders and work platforms must be inspected by EPS personnel at the start of each workday in order to assure that ladder or work platform is not damaged, defective or unsafe. The individual performing an inspection must prepare a report of the inspection. Copies of the inspection reports must be filed with the Director of Quality Assurance on a weekly basis and the original must remain on file at the EPS facility where the inspection occurred.
In addition to the daily inspection, employees are encouraged to inspect ladders and work platforms prior to each use throughout a given workday. If any problem is noted with respect to any ladders and work platforms, the unit must be retired from service and a report prepared documenting the problem. The ladder or work platform which is retired from service may not be placed back into service unless the unit can be repaired back to the original manufacturer's specifications. Any ladder or work platform that is retired from service and cannot be repaired to the original manufactures' specifications must be destroyed so as to ensure the unit will not be used again.
INJURY & ILLNESS POLICY

EPS maintains records and reports all occupational injuries or illnesses to the appropriate State or federal authority consistent with the Occupational Health and Safety Act (OSHA). In accordance with this policy, all employees must report any injuries or illnesses suffered in the work environment to their supervisor. For the purposes of this policy the work environment will be broadly construed to include injuries or illnesses suffered on travel assignments and at work sites within the continental United States (CONUS). The employee’s supervisor will make a record of all illnesses and injuries or illnesses suffered in the work environment and file the report with the Human Resource department. All injuries or illnesses suffered in the work environment should be reported to the Human Resource department within 1 working day of the occurrence, except in the case of serious injuries or illnesses, which must be reported prior to the end of a work shift.

Human Resources will determine if an injury or illness must be reported on an OSHA form 101 “First Injury Report” form. Human Resources will maintain a record of all occupational injuries or illnesses suffered into the appropriate forms. All injuries reported on the OSHA form 101 will be recorded on an OSHA Form No. 200 Log. Human Resources will report all injuries and illnesses to the applicable State or federal agency in accordance with the OSHA laws and regulations.

Human Resources will post an annual summary of all occupational injuries or illnesses on an OSHA approved form during the month of February for the prior calendar year. Human Resources will retain all records for 10 years following the conclusion of the end of the year in which the records relate.
SECURITY GUIDE

PREFACE

The purpose of this security guide is to introduce you to the Defense Industrial Security Program (DISP), and to familiarize you with the security procedures that you should know about. All EPS employees with a security clearance must comply with these procedures.

THE DEFENSE INDUSTRIAL SECURITY PROGRAM:

The DISP is designed to protect classified information in the interest of national security. EPS has executed an agreement with the U.S. Government to safeguard classified information. This contract requires that EPS maintain a system of security controls that comply with Federal regulations.

Failure to comply with Federal regulations could jeopardize EPS’s facility clearance and, in turn, our ability to do classified business with the Government. EPS’s commitment to meet its security obligation is a responsibility each of us shares. An understanding of your individual security responsibilities is essential for compliance with Federal regulations. EPS Corporation has a Security Officer to manage the DISP. The security office is responsible for providing guidance to employees who have any security questions.

SECURITY DEFINITIONS

1. ADVERSE INFORMATION – Information that reflects negatively on the integrity or character of a cleared employee, which suggests that his or her ability to safeguard classified information may be impaired. The following are examples of the type of information that should be reported to the Government Security Office.
   - Criminal activities
   - Bizarre or notoriously disgraceful conduct
   - Treatment for mental or emotional disorders
   - Excessive use of intoxicants
   - Use of illegal, controlled substance such as marijuana, hashish, cocaine, and heroine
These examples are not all inclusive of the types of information that must be reported and only information that has been confirmed as fact need be reported.

**DISCLOSURE OF CLASSIFIED INFORMATION**

Information pertaining to classified projects, even though such information is unclassified, shall not be released to the public, except as specified below, without permission from the Department of Defense (DOD). DOD approval is not required for the following:

- Announcing that a contract has been received
- The total dollar amount of the contract, unless that information equates to:
  - a level of effort in a sensitive research area
  - quantities of stocks of certain weapons/equipment that are classified
- Information previously approved officially for disclosure by DOD

**WORKING PAPERS**

Classified working papers must be filed in a security folder stamped with the document’s overall classification. These folders may be obtained from the Security Office. Furthermore, each interior page must be stamped at the top and bottom with the highest classification of information appearing thereon. Working papers may not be reproduced without the permission of the Security Office and must be destroyed as soon as practical.

**REPRODUCTION**

The Security Office must authorize reproduction of classified material. Security is required to account for all copies of classified documents.

**CLASSIFIED VISITS**

Visit requests are required for classified visits to another facility. The Security Office will forward your clearance to the facility you plan to visit. Visit requests are required for classified visits to other contractors, government facilities and each EPS location. For example, a visit request is required whenever an EPS employee attends a classified meeting at either the EPS Europe or EPS Augusta, GA locations and vice versa.
A government agency must certify your need-to-know if EPS does not have a contractual relationship with the place you intend to visit. Therefore, you must provide the Security Office with sufficient lead time to allow the appropriate government agency to certify your need-to-know. The amount of lead time needed varies with each government agency. The average lead-time is two weeks.

**AUTOMATIC INFORMATION SYSTEMS (AIS)**

DOD authorization is required before classified information is processed on any computer system (including personal computers, word processors, or memory typewriters). Since AIS are particularly vulnerable to unauthorized interception, classified information may only be processed on system approved by the Security Office and DOD.

**REPORTING RESPONSIBILITIES**

The integrity of our security program depends on the participation and cooperation of all employees. Timely reporting of the following to the Security Office is required under EPS’s security agreement with the Government:

- Adverse Information
- Travel to or through designated countries
- Unlocked and unattended security containers
- Name change
- Loss or compromise of classified information
- Espionage, sabotage, or subversive activity
TRAVEL

Travel

Travel Compensation and Reimbursement
Travel reimbursement will not exceed the amounts and conditions specified by the Federal Acquisition Regulation (FAR) 31.205-46 and the Joint Travel Regulations (JTR). Any exceptions must be pre-approved by Senior Management.

Definition of Per Diem
Per Diem is the allowance for lodging, meals and incidental expenses. The rate is broken between lodging as well as meals and incidental expenses (ME&I). Per Diem allowance is not authorized unless the trip covers more than a 12 hour period.

For Exempt Employees
Exempt employees are not compensated for travel time on corporate business during other than normal working hours.

For Non-Exempt Employees
Compensation during travel time will be in accordance with the Fair Labor Standards Act. Managers must contact the Payroll department to determine if travel time will qualify for compensation.

The hours of travel exceeding the 40 hour workweek must be approved in advance by the Division President or Vice President/General Manager, CEO or the Vice Chairman/President.

General
Employees may be required to follow additional guidelines by Division and/or contract as well as the guidelines below.

Compensation for travel time may be approved in advance by the appropriate management by means of the “On-Line Expense Authorization”. If an advance is requested the Expense Authorization may be necessary. Compensation will be in accordance with Paragraphs 1.1.2 and 1.1.3 above.

Employees will not be reimbursed in excess of the rates set forth in the applicable regulations referenced in Section 1.1.1. These rates are documented on the On-Line Expense Authorization request, or can be found through the details provided when completing the On-Line Expense Report (ER).
Travel outside the 48 contiguous States and the District of Columbia (CONUS) is considered overseas travel (OCONUS), and may be governed by additional insurance requirements which are addressed in the paragraph titled “Insurance” section 1.9.2.

Direct Travel

Lodging
Travel trips of 30 days or less and extending longer than 12 hours in one day that are directly chargeable to a contract, are covered under "Direct Travel". The appropriate per diem rate for the area traveled to will be made known to the employee prior to his or her departure. Lodging rates will not exceed the Authorized rates published in the JTR unless prior approval is received. Lodging reimbursement will be reimbursed up to the JTR established rate upon submission of valid vendor receipt(s). Employees will be reimbursed actual cost of lodging up to JTR authorized rate.

Meals & Incidentals (ME&I)
The ME&I is a daily rate, not to exceed the amounts specified by (FAR) 31.205-46 and the JTR, paid to cover expenses for meals, and related incidental expenses, including taxes, service charges and personal phone calls. The ME&I allowance is distinguished from transportation expenses and other miscellaneous travel expenses. 75% of the daily rate will be reimbursed for the first and last day of travel. In some instances the daily ME&I rate will be governed by individual Division rules.

Meals
This includes expenses for breakfast, lunch and dinner, and related tips and taxes. (Specifically excluded are alcoholic beverage and entertainment expenses and any expenses incurred for other persons.)

Incidental Expenses
Such expenses include the following:

a. Fees and tips to waiters and waitresses, porters, baggage carriers, bellhops, hotel maids, dining room stewards or stewardesses, hotel servants in foreign countries;

b. Laundry, cleaning and pressing of clothing;

c. Transportation between places of lodging or business, and places where meals are taken unless otherwise provided;
d. Faxes and telephone calls to reserve lodging accommodations.

Indirect Travel

Lodging
Travel trips of 30 days or less and extending longer than 12 hours in one day that are not directly chargeable to a contract, are covered under "Indirect Travel". The appropriate per diem rate for the area traveled to will be made known to the employee prior to his or her departure. Lodging reimbursement will be reimbursed up to the JTR established rate upon submission of valid vendor receipt(s). Employees will be reimbursed actual cost of lodging up to JTR authorized rate.

Meals & Incidentals (ME&I)
Meals and incidental expenditures will be reimbursed at the actual expenditure (supported by receipts) not to exceed the amounts specified by FAR 31.205-46 and the JTR, paid to cover expenses for meals, and related incidental expenses, including taxes, service charges and personal phone calls. These reimbursements are distinguished from transportation expenses and other miscellaneous travel expenses. 75% of the daily rate for the first and last day of travel will be used as ceilings for reimbursement. Actual receipts will be provided for all meal and incidental reimbursement requests.

Meals
This includes expenses for breakfast, lunch and dinner, and related tips and taxes. (Specifically excluded are alcoholic beverage and entertainment expenses and any expenses incurred for other persons).

Incidental Expenses
Such expenses include the following:

- Fees and tips to waiters and waitresses, porters, baggage carriers, bellhops, hotel maids, dining room stewards or stewardesses, hotel servants in foreign countries;
- f. Laundry, cleaning and pressing of clothing;
- g. Transportation between places of lodging or business, and places where meals are taken unless otherwise provided;
- h. Faxes and telephone calls to reserve lodging accommodations.
Flat Rate Per Diem for Long Term TDY

7.5.1 Temporary Field Assignments
The flat rate per diem applies for long-term TDY lasting 31 or more days. This policy only applies when a traveler is TDY to a single location for more than 30 consecutive days. The flat rate per diem will be established prior to the employee departing for travel. 75% of the established per diem rate found in the JTR will be paid for trips that are scheduled for more than 30 days and up to 180 days. For trips scheduled for more than 180 days, a flat daily rate per diem of 55% of the established per diem rate in the JTR will be paid. Valid lodging receipts will still be required for reimbursement.

When an employee is governed by long-term TDY rules, all lodging, meals and incidental expenses will be covered by the daily 75% or 55% established per diem rate. Lodging receipts will be required, but only for proof of payment, not for reimbursement reasons.

7.5.2 Temporary Duty (TDY) Status – Per Diem while injured or ill
Employees on TDY status are required to delineate between vacation and sick time. An employee that becomes ill or injured while on Temporary Duty (TDY) status and remains at the TDY site is eligible to be paid up to a maximum of two (2) days of Per Diem with the approval from the Site Chief/Team Leader. The Site Chief/Team Leader must complete the “TDY Illness or Injury Acknowledgment” form and submit it with the employees “Travel and Expense Report” (TER). Employees will not receive per diem for absences of less than or equal to two days without the Site Chief/Team Leaders certification.

Employee will not draw Per Diem if they depart the TDY location.

Any employee out of work for over two days will require a signed doctor’s note stating the reason for absences from duty (will not exceed 5 days per calendar year). Employees will not receive per diem for absences over two days without the signed doctor’s note.

Advances and Expense Reports

Advances
Employees may request travel advances to cover anticipated business expenses. The Expense Administrator will determine the amount of the advance that will be authorized for each individual trip.
If employee travel is expected to exceed a 14-day period, advances MAY be given up to a maximum of 75% of the 14-day increments. Employees must submit expense reports weekly before continuing incremental advances can be approved.

**Expense Reports**
Expense reports are required to be submitted within seven days after return from a trip and may not be accepted if submitted over 30 days after the completion of a trip.

**Field Service personnel will submit expense reports no later than Monday of each week for the previous weeks travel.**

For employees that travel infrequently, a paper expense report may be required. Employees must contact their manager for a copy of this form.

**On-Line Expense Direction**
Employees are to refer to the document titled “Directions for Entering on-line Expense Reports” to access detailed directions on how to complete Electronic Expense Reports.

**Miscellaneous Expenses: Allowed**
*(Field Service personnel must receive prior approval)*

Reimbursement will be allowed for necessary miscellaneous expenses incurred by a traveler in connection with the transaction of official business. The following is a list of most common expenses that are allowable:

a. Fees in connection with issuance of passports and visas, costs of photographs for passports and visas, costs of certificates of birth, health, and identity, and of affidavits for travel outside the United States.

b. Fees for conversion of currency in foreign countries.

c. Cost of cashing checks incurred for travel. *(Not Applicable to Field Services Division).*

d. Cost of traveler checks, money orders or certified checks purchased in connection with official travel inside or outside the continental United States for the safe transportation of personal funds necessary for normal expenses incurred, provided that the total value of such instruments is not more than the per diem estimated for the authorized travel. *(Not Applicable to Field Services Division).*

e. Communications, that is, telephone, facsimile, electronic mail, etc.
**Expenses Not Reimbursable**

Non-Business expenses, including the following, are not reimbursable:

a. Charges for radio, television, or recreation and personal expenses to include personal phone calls, transportation required for personal reasons, and medical expenses. (Note: employees who participate in an EPS group medical plan may be covered under the Medical Insurance Policy with the exception of injuries or accidents occurring at the work site, in which case they may be covered under Worker's Compensation. The certificate of coverage provides detail on items and services covered under the group medical plan.)

b. Expenses incurred because family members accompany the employee.

c. Living expenses (including per diem) for periods of vacation and other voluntary leave taken while on travel assignment, including weekends falling within such periods. However, weekends are reimbursed when it is required, or it is in the best interest of EPS, that the employee remains at the location.

d. Cost of personal trip insurance.

e. If an employee rides with another employee who is reimbursed for use of a personal automobile between two business points, only one employee is eligible for reimbursement for transportation between those two points.

**Transportation**

EPS will reimburse transportation expenses, including miscellaneous costs for parking and all toll charges, with proper receipts.

**Travel to and from Airports**

*(Field Service personnel must receive prior approval)*

Reimbursement will be made at the Government rate in effect per mile for the use of personal automobiles between work location, home and airport.

If a personal automobile is used, the cost of airport parking is reimbursable. The parking receipt must be attached to the expense report. Hourly lot parking will not be authorized for payment unless approved prior to travel.

EPS administrators will determine if taking an airport limo or other means of transportation will be less expensive than paying to park an automobile.

**Car Rentals**

*(Field Service personnel must receive prior approval)*
Car rentals must be approved in advance of the trip. The responsible manager will authorize the size vehicle which is most economical for the business to be performed. The project administrators will make all necessary arrangements for contract travel.

When rental cars are used in the course of business travel, the traveler is responsible for obtaining the appropriate insurance coverage from the rental agent. Appropriate insurance coverage is defined as that coverage which will cover all reasonable costs related to an accident, therein eliminating personal or corporate responsibility for cash outlay as a result of an accident.

The corporate agreement in place between EPS and AVIS provides for LDW insurance coverage at most locations. Employees renting from AVIS under the corporate rate within the Continental United States (CONUS) (excluding Alaska and Hawaii) will insure that the LDW is covered and stated on the rental agreement and all other insurance is declined. Note some locations do not honor our coverage under the corporate agreement. In this case you would accept only the LDW coverage. Based on the length of the trip, EPS will select the car rental plan which is in the best interest of the company (e.g., for trips over 30 days a monthly rate plan should be used).

**Bus, Rail and Airfare**
*(Field Service personnel must receive prior approval)*

Normally, EPS will issue to the traveler prepaid tickets for bus, rail, or air transportation. If it is necessary to purchase transportation en route, the employee should purchase it on a credit card where possible, or out of a travel advance. Such en route purchases should be claimed on the expense report. Prior notice of such charges should be provided to the cognizant manager in all cases. If urgency prevails, notice must be provided not later than the next working day. Please remember to include company paid travel on your Expense Report as a Company Paid Expense.

The policy for air travel is the lowest customary standard, coach. If coach is not available and due to business necessity an employee must upgrade, documentation from the airline must be provided. An individual who personally makes an upgrade to include first or business class arrangements without justification will be required to pay the additional fare.

Employees on travel status may not fly as pilots or flight crew members during any company travel time, without prior approval of the CEO or the Vice Chairman/President.
**Taxi**
*(Field Service personnel must receive prior approval)*

Taxi fares necessary to conduct business will be reimbursed. Taxi fares for personal reasons will not be reimbursed. Taxi fares incurred at non-business points will be reimbursed only for a stated business reason, i.e., if necessary due to the requirement to travel from one airport to another.

Receipts must be submitted by the traveler.

**Personal Automobile**
*(Field Service personnel must receive prior approval)*

When authorized in advance, use of personal automobile will be reimbursed at the mileage rate in effect at the time.

On a short-term assignment when the employee will visit locations relatively close to home location, the employee may be authorized to take a personal car and use it for the short-term assignment location. This would be authorized if the total cost of the trip would be less than if commercial transportation were used.

Mileage will be computed over the most direct route as established by the current Transportation and Travel Regulations Official Table of Distances.

Employees that hold corporate gas cards will not be reimbursed for mileage.

Employees will not be reimbursed for any other expense such as repairs, fuel, etc.

**Determining Expenses**

Travel reimbursement will not exceed the amounts and conditions specified by the Federal Acquisition Regulation (FAR) 31.205-46 and the Joint Travel Regulations (JTR). Any exceptions must be pre-approved by Senior Management.

**Business Meals**
*(Field Service personnel must receive prior approval)*

A business meal is justified when a minimum of one customer is present. The name(s) and titles of the customer(s) taken out must be identified and must be accompanied with the supporting receipt(s).

It is contrary to policy for employees to entertain each other when one or both are on travel status. In this situation, employees are to pay for their own meals.
On occasion, EPS may host a business activity or meal as a means to congratulate employees on the completion of a project, etc. These business activities will be reviewed and approved on a one-to-one basis.

**Lodging**  
(Field Service personnel must receive prior approval)

Advance reservations are recommended to be made through the administrator responsible for your travel. The lowest available rates should be obtained whenever possible. EPS will reimburse lodging expenses as provided herein. Lodging rates will not exceed the Authorized rates published in the JTR unless prior approved. Lodging reimbursement will be reimbursed up to the JTR established rate upon submission of valid vendor receipt(s). Employees will be reimbursed actual cost of lodging up to JTR authorized rate.

Where guaranteed reservations are made, the traveler is responsible for cancellation. Expenses incurred as a result of failure to cancel such guaranteed reservations can be reimbursed only when the traveler has been unable to make contact and cancel the reservations.

If an employee is maintaining quarters at a temporary field assignment location of longer than 30 days, and is required to make side trips, the employee will be reimbursed for any additional travel expenses incurred, provided such side trips are approved and appropriate receipts are provided.

**Communications**  
(Field Service personnel must receive prior approval)

Wires, facsimiles and phone calls regarding business are allowable and reimbursable expenses, but must be justified and approved upon submission of travel vouchers.

**Combining Business and Personal Travel**

An employee who includes personal travel in a trip itinerary must pay all costs of the personal portion of the transportation charges.

**The EPS Portion of Travel**  
(Field Service personnel must receive prior approval)

Whenever personal and business travel are mixed, EPS will reimburse the employee for the authorized travel fare between the business points following the most direct route (or authorized route if direct is impractical).
If an employee rides with another employee who is reimbursed for use of a personal automobile between two business points, only one employee is eligible for reimbursement for transportation between these two points.

**Vacation Interruption**  
*Field Service personnel must receive prior approval*

EPS may request that an employee interrupt a vacation or other leave to perform company business. In such an event, the employee will commence business travel from the point of vacation. The employee will be reimbursed for all business expenses in accordance with the provisions of this directive. Should the employee return from a business trip directly to home or normal work location after a vacation is interrupted by a required business trip, the employee will be reimbursed for transportation cost, meal allowance, and actual and reasonable hotel expense only for that portion of the return trip in excess of the distance between the vacation point and home or normal work location.

**Exceptions**  
Exceptions to this policy must be on a case-by-case basis and require the prior approval of the Division President or Vice President/General Manager, the CEO or the Vice Chairman/President.

**Foreign Travel**  
An employee may be required to travel on business assignments to locations OCONUS. EPS will reimburse employees for reasonable business expenses while on authorized travel status to foreign locations as outlined in Sections 1.8.3.

**Applicability**  
EPS Foreign Travel policy applies to all employees engaged in travel on corporate business to all foreign locations (i.e., OCONUS). It is applicable to all business related activities (direct contract and indirect), including those performed under the provisions of the U.S. Government Status-of-Forces Agreement with the country in which work is to be performed.

**Insurance**  
EPS provides insurance coverage, as required under the Defense Base Act (DBA), as a means of compensating employees for death or injury while working on US Government contracts outside the US.

Employees should contact Human Resources to determine if they are covered under any other insurance policies. Insurance coverage may vary based on contract and/or position.
Foreign Travel Paid Time Off – Field Service Employees Only

Employees under the Field Service division that are OCONUS are subject to the following provisions (these conditions may also apply to other EPS divisions as directed by the contract or requirement that the employee is traveling under):

1. During the first 90 days of employment (probation period) no Paid Time Off is authorized.

2. A between tour break may be taken at 6 months if an employee is on a 12 month tour.

3. When an employee leaves the “Area of Responsibility” (AOR), he/she may claim at a maximum 8 hours of work time (no uplift) on the travel day home. PTO starts when the employee arrives stateside and ends when the employee gets on the plane heading back OCONUS. The fly day back is also at a maximum of 8 hours of work time (no uplift). The day the employee returns to work is the day regularly scheduled work hours take effect.

4. Leave without pay (LWOP) and advanced leave are approved by the EPS Field Services President on a case-by-case basis depending on the circumstances.

5. In all instances LWOP is only allowed after all accrued PTO has been used.

Procedure for Foreign Travel

Preparation for Overseas/Foreign Travel
(Field Service personnel must receive prior approval)

Employees are requested to complete an Authorization Request. The employee is responsible for obtaining passport, visas, immunization, or other items necessary for the foreign locations to be visited. Expenses related to these items are reimbursable with supporting receipts.

If required by the Contractor Personnel Account and upon issuance of user ID’s and passwords, EPS employees may be required to record their movement through use of a civilian tracking system.

Allowable Expenses
(Field Service personnel must receive prior approval)
Expenses will be allowed commensurate with the degree of U.S. logistical support, which is available to the employee. In those cases in which the employee is not entitled to the logistical support of a Status-of-Forces Agreement (i.e., the employee is "living on the economy"), allowable expenses will be commensurate with the living costs of the country in which work is performed. In the event of a Status-of-Forces Agreement, expenses will be authorized dependent upon the value of the logistical support.

**Travel by Sea**
Travel by sea, must be approved in advance by the CEO or Vice Chairman/President.

**Government Provided Transportation**
Personnel traveling under a contract subject to cost free use of Government transportation shall use such transportation whenever schedule allows.

**Purchase of Tickets en Route**
* (Field Service personnel must receive prior approval)*

Normally, EPS will issue to a traveling employee prepaid tickets. If it is necessary to purchase transportation in route, the employee should purchase it against a credit card where possible.

**Local Travel at Foreign Locations**

**Local Transportation**
Taxi, bus or other local public transportation necessary to conduct business will be reimbursed. Fares incurred at non-business points will be reimbursed only for a stated business reason, (e.g., if necessary due to the requirement to travel from one airport to another.) A receipt is required for any trip. Fares for personal travel will not be reimbursed.

**Car Rentals**
* (Field Service personnel must receive prior approval)*

Car rentals must be approved in advance of the trip. The size vehicle rented must be previously approved. Employees wishing an upgrade in car rental may do so at their own personal expense.

All available insurances should be purchased for OCONUS rentals. The EPS – AVIS corporate agreement for LDW insurance does **not** apply to OCONUS locations. Your EPS travel provider will request all available insurances to be purchased in your reservation.
Based on the length of the trip, the travel administrator will select the car rental plan which is in the best interest of EPS (e.g., for trips over 30 days a monthly rate plan should be used.)

**Special Transportation**
Because of unusual or restricted travel conditions in some foreign locations, the responsible manager may authorize special modes of transportation (e.g., chauffeured automobile).

**Tax Reimbursement**
The employee shall be responsible for all local sales, excise, or other taxes levied upon purchases and for all duties or other fees on goods brought into or removed from foreign country or imported into the United States, unless essential to performance of his or her tasks.

In some instances, particularly in assignments not subject to a Status-of-Forces agreement and longer than six months in a foreign country, the employee may be liable for foreign income tax. If such tax liability is anticipated the duration of foreign assignment must be limited to a period of time less than the effective date of liability. This may be accomplished by several means to include returning the employee to headquarters, recreation vacation, etc.

**Flat Rate Per Diem and Long Term TDY**
The flat rate per diem applies for long-term TDY lasting 31 or more days. This policy only applies when a traveler is TDY to a single location for more than 30 consecutive days. The flat rate per diem will be established prior to the employee departing for travel. 75% of the established per diem rate found in the JTR will be paid for trips that are scheduled for more than 30 days and up to 180 days. For trips scheduled for more than 180 days, a flat daily rate per diem of 55% of the established per diem rate in the JTR will be paid. Valid lodging receipts will still be required for reimbursement.

**Exceptions**
Exceptions to this policy must be on a case-by-case basis and require the prior approval of the CEO or the Vice Chairman/President.