

## ABS Personnel Policies

### Code of Conduct

ABS employees are expected to conduct their work with professionalism, personal integrity and respect for the rights, differences and dignity of others.

ABS reserves the right to terminate any employee whose overall work habits, attitude, conduct or job performance is unsatisfactory. Conduct that is determined by ABS to be inappropriate may be subject to disciplinary action up to and including unpaid suspension or termination of employment.

Conduct that ABS considers inappropriate includes, but is not limited to, the following:

- Violation of federal, state and local law
- Violation of policies, procedures and practices of ABS
- Physical violence, threats of violence or verbal abuse
- Intentional damage to ABS's or co-workers' property, including misuse or theft of resources
- Failure to maintain confidentiality of ABS information
- Falsification of records
- Insubordination
- Excessive absenteeism or tardiness
- Bringing weapons onto ABS property
- Reporting to work under the influence of controlled substances or alcohol, possessing or using such substances at work, or other violations of ABS's Drug-Free Workplace Policy.

Employees are encouraged to obtain guidance or support from a supervisor or HUMAN RESOURCES (Currently the CEO and CFO) for actions, outcomes or alternatives as needed to uphold the employee conduct policy.

### Equal Opportunity Employment (non-discrimination)

ABS is committed to achieving and maintaining a diverse and representative workforce and a workplace free of discrimination. ABS prohibits discrimination, including harassment, in its own workplace on the basis of race, color, religion, sex (including pregnancy and gender identity), national origin, disability, age, veteran's status, sexual orientation, genetic information, marital status, parental status, political affiliation, and any other conduct that does not adversely affect the performance of the employee.

In addition, ABS complies with applicable state and local laws governing nondiscrimination. This policy applies to all terms and conditions of employment, including, but not limited to, hiring, placement, promotion, termination, layoff, recall, transfer, leave of absence, compensation, and training.

### Americans with Disabilities Act

The Americans with Disabilities Act (ADA) requires an employer to provide reasonable accommodations for individuals with disabilities, unless it would cause undue hardship to ABS, and provided that the employee can perform the essential functions of his/her job duties with or without a reasonable accommodation. A reasonable accommodation may include changes in the work environment enabling an employee with a disability to perform the essential functions of their job. If you would like to request an accommodation related to a medical condition, you may contact your manager to discuss the request, which may be done verbally or in writing. Your manager will work with ABS HUMAN RESOURCES to respond promptly and to the best of our ability to accommodate such requests.

### Anti-Harassment

ABS encourages and maintains a working environment that fosters mutual respect and promotes respectful and congenial relationships between employees, free from all forms of harassment by anyone, including supervisors, co-workers, vendors, contractors or customers. Harassment, even when not unlawful or directed at a protected category, is expressly prohibited and will not be tolerated by ABS. Accordingly, management is committed to vigorously addressing complaints of harassment, sexual harassment, and discrimination at all levels within the organization. Reported or suspected occurrences of harassment or discrimination will be promptly and thoroughly investigated. Following an

investigation, ABS will promptly take any necessary and appropriate disciplinary action. Additionally, ABS will not permit or condone any acts of retaliation against anyone who files harassment or discrimination complaints, or cooperates in the investigation of same. Any employee may file a complaint regarding incidents experienced personally or incidents observed in the workplace.

- The term “harassment” includes harassment based on any category protected by federal, state, or local law, which, depending on the jurisdiction, may include but is not limited to, unwelcome slurs, jokes, or verbal, graphic or physical conduct relating to an individual's race, ethnicity, color, citizenship, national origin, religion, sex, gender identity, sexual orientation, marital status, age, disability, genetic information, military service, veteran status, pregnancy/childbirth and related medical considerations (e.g. lactation), or any other protected class under applicable law is a violation of this policy and will be treated as a disciplinary matter.
  - Sexual harassment consists of unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature where:
    - Submission to such conduct is an explicit or implicit term or condition of employment;
    - Employment decisions are based on an employee's submission to or rejection of such conduct;
- or,
- Such conduct unreasonably interferes with an individual's work performance or creates an intimidating, hostile or offensive working environment.

Reporting all harassment, sexual harassment, or discrimination is imperative to finding resolution. To report a complaint, contact ABS HUMAN RESOURCES.

### Complaint Procedure

ABS is committed to facilitating reports of incidents of alleged harassment, including sexual harassment and discrimination. Any employee who feels harassed or discriminated against is encouraged to immediately inform the alleged harasser that the behavior is unwelcome. In many instances, the person is unaware that his/her conduct is offensive and when so advised, may easily and willingly correct the conduct so that it does not reoccur. If an informal discussion with the alleged harasser is unsuccessful in remedying the problem, or if you do not feel comfortable with such an approach, immediately report the conduct to a manager or partner and ABS HUMAN RESOURCES. A harassment or discrimination problem cannot be resolved unless we know about it. It is up to you to bring these issues to our attention so that ABS can take the necessary steps to correct the problem. The report should include all facts available to the employee regarding the alleged harassment, sexual harassment, or discrimination.

### Confidentiality

All reports of alleged harassment, sexual harassment, or discrimination will be treated seriously. It will be kept confidential to the extent possible while still allowing ABS the ability to conduct a full and thorough investigation, and will be shared only with relevant individuals on a need-to-know basis. However, absolute confidentiality is not promised nor can it be assured.

### Investigative Procedure

Once a complaint of alleged harassment, sexual harassment, or discrimination is received, ABS will take appropriate action, which may include investigation. The investigation may include interviews with all involved employees, including the alleged harasser, and any employees who are aware of facts or incidents alleged to have occurred.

Following an investigation, ABS will promptly take any necessary and appropriate disciplinary action. Disciplinary action will be taken if the investigation reveals that an employee has acted in a manner that is not in alignment with the goal of this policy, even when the actions may be lawful. In fact, ABS may address any workplace issue discovered during an investigation. This may include some or all of the following steps:

- Restore any lost terms, conditions, or benefits of employment to the complaining employee
- Discipline the alleged harasser to include possible written disciplinary warnings, transfer, demotion, suspension, and termination of employment

If the alleged harassment or sexual harassment is by a vendor, contractor, customer, or other third

party, ABS will take appropriate action within its means to stop the conduct.

If you have made a complaint but feel that the action taken in response has not remedied the situation, please contact ABS HUMAN RESOURCES? immediately.

### Drug-Free Workplace

ABS complies with the drug-free workplace requirements found in subpart B of 2 CFR 782, which adopts the Government-wide implementation (2 CFR part 182) of sec. 5152-5158 of the Drug-Free Workplace Act of 1988 (Pub. L. 100-690, Title V, Subtitle D; 41 U.S.C. 701-707).

ABS's policy is to maintain a drug-free workplace. As a condition of continued employment, all ABS employees must comply with this policy. The term "workplace" is defined as ABS property, any ABS sponsored activity, or any other site where the employee is performing work or representing ABS (such as a customer site). The term "drug" as used in this policy includes alcoholic beverages and prescription drugs, as well as illegal inhalants and illegal drugs and/or controlled substances as defined in schedules I through V of the Controlled Substances Act, 21 U.S.C. § 812, 21 C.F.R. Section 1308, and the state and local law of the jurisdiction where the workplace is located, including, but not limited to, marijuana, opiates (e.g., heroin, morphine), cocaine, phencyclidine (PCP), and amphetamines. An employee who engages in an activity prohibited by this policy shall be subject to disciplinary action, up to and including immediate termination of employment.

Prohibited activities under this policy include the possession, use, sale, attempted sale, distribution, manufacture, purchase, attempted purchase, transfer, or cultivation of drugs as defined above, in the workplace as defined above. Employees are also prohibited from reporting to work under the influence of drugs. However, the use and/or possession of prescription drugs, when taken as directed and obtained with a valid prescription, shall not be a violation of this policy. Information regarding the availability of treatment programs, if any, such as assistance provided by ABS's health care plan coverage or drug and alcohol abuse rehabilitation programs and the requirements for participation in drug and alcohol abuse education and training programs, may be requested by contacting HUMAN RESOURCES. This policy does not prohibit the responsible use of alcohol outside of working hours on company property or at company sponsored events when specifically approved by management.

### Human Trafficking

In addition to discrimination and harassment, ABS does not tolerate violations of any federal, state, or local human trafficking, or sexual exploitation and abuse laws, including sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age, or the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services through the use of force, fraud, or coercion, for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery. Exchange of money, employment, goods, or services of sex, including sexual favors or other forms of humiliating, degrading, or exploitive behavior is prohibited. This includes exchange of assistance that is due to beneficiaries. All ABS employees have an obligation to report any suspected violations of any human trafficking or sexual exploitation and abuse laws. ABS requests that employees report any suspected violations to their supervisor or management for investigation by ABS. All reports will be promptly investigated by ABS and appropriate corrective action will be taken if warranted by the investigation. Reports of wrongdoing and investigations of such reports shall be kept confidential to the extent practicable, consistent with the need to conduct a thorough and fair investigation. Disclosure of reports of wrongdoing to individuals not involved in the investigation is prohibited.

ABS prohibits retaliation against an employee who in good faith makes any report pursuant to this policy, about conduct reasonably believed to be wrongdoing as defined in this policy. ABS also prohibits retaliation against any employee who participates in an investigation of such reports. Any employee who engages in such retaliation will be subject to discipline up to and including termination of employment.