



EMPLOYEE HANDBOOK

WELCOME TO MBI

www.mbidirectmail.com



A WARM AND SINCERE WELCOME TO MBI!

Whether you have just joined our staff or have been with MBI for a while, we are confident that you will find our company a dynamic and rewarding place in which to work. We look forward to a productive and successful association.

We consider the employees of MBI to be our most valuable resource.

We hope that your employment here will be both challenging and personally rewarding.



Established in 1989, MBI is a print and digital advertising company. We work with our clients to promote their products and services through direct mail programs and digital advertising that we design for their specific requirements.

PURPOSE

To meet and exceed the expectations of our employee-owners, customers and vendors in a balanced, healthy, family environment.

BUSINESS

To be America's choice for direct mail and digital services.





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INTRODUCTION

We hope that this Handbook will help you become better acquainted with MBI's policies and benefit plans; there are several things that are important to keep in mind.



General Information

This handbook does not create an express or implied contract of employment. This Handbook contains only general information and guidelines. It is not intended to be comprehensive or to address all the possible applications of the general policies and procedures described. Some of the subjects described here are covered in detail in official policy documents. You should refer to those documents for specific information. Please note that the terms of the written insurance policies are controlling. For that reason, if you have any questions concerning eligibility for a particular benefit, or the applicability of a policy or practice, you should address your specific questions to your Manager.

Handbook Changes

MBI reserves the right to change, add or delete procedures, practices, policies and benefits. We will try to inform you of any changes as they occur. Handbooks are always available within the public portion of outlook and on the payroll portal.

At Will Employment

Neither this Handbook nor any other Company document confers any contractual right, either expressed or implied, to remain in MBI's employ, nor does it guarantee any fixed terms and conditions of your employment. Your employment is not for any specific time and may be terminated at will, with or without cause and without prior notice by MBI, or you may resign for any reason at any time. No Manager or other representative of MBI has the authority to enter into any agreement for employment for any specified period of time, or to make any agreement contradictory to the above.



2.1 | NON DISCRIMINATION AND HARASSMENT

MBI strives to maintain an environment free from discrimination and harassment, where employees treat each other with respect, dignity and courtesy. To ensure this, we expressly prohibit discrimination or harassment based on race, color, religion, gender, national origin, age, marital status, pregnancy, military service, disability, or any other category protected by law. The company also does not discriminate as retaliation for filing a charge; reasonably opposing discrimination; or participating in a discrimination lawsuit, investigation, or proceeding. This policy applies to all phases of employment — including but not limited to recruiting, testing, hiring, promoting, demoting, transferring, laying off, terminating, paying, granting benefits, and training.

Prohibited Actions

Unlawful harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of their race, color, religion, gender, national origin, age, marital status, pregnancy, disability, military service, or any other category protected by law, when it:

- Has the purpose or effect of creating an intimidating, hostile or offensive working environment;
- Has the purpose or effect of unreasonably interfering with an individual's work performance; or
- Otherwise adversely affects an individual's employment opportunities.

Sexually harassing behavior, in particular, includes all harassment based upon sex, including unwelcome conduct such as: sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature. Such conduct may constitute sexual harassment when it:

- Is made as an explicit or implicit condition of employment;
- Is used as the basis for employment decisions;
- Unreasonably interferes with an individual's work performance; or
- Creates an intimidating, hostile or offensive working environment.

Types of Conduct Covered by This Policy

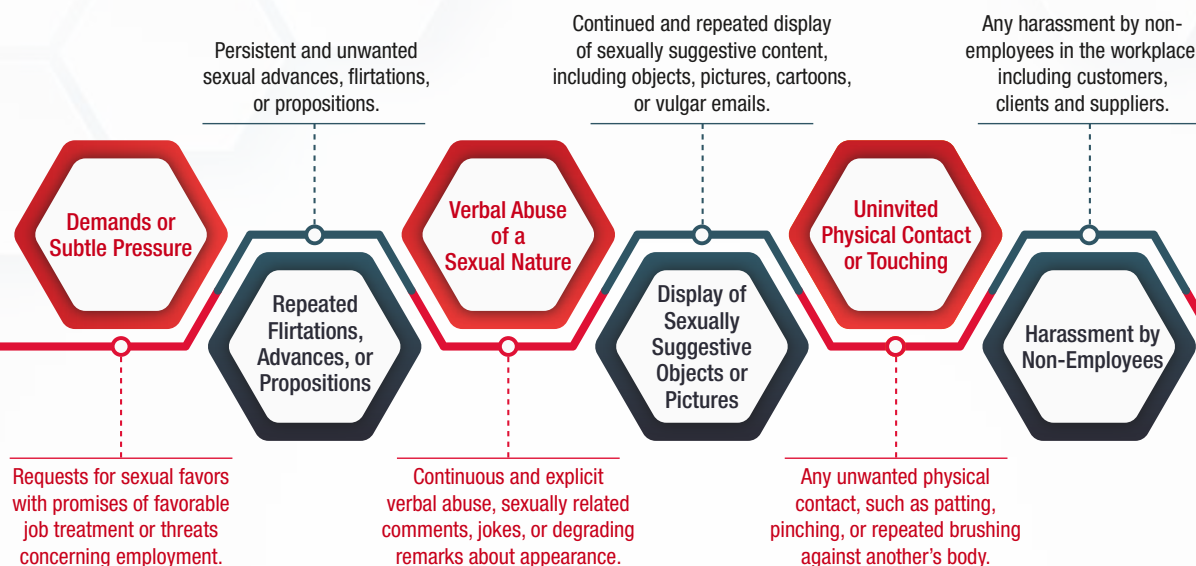
- Demands or subtle pressure for sexual favors accompanied by a promise of favorable job treatment or a threat concerning employment;
- Repeated sexual flirtations, advances or propositions;



The following behaviors will not be tolerated:

- ✘ Verbal or physical harassment of any kind.
- ✘ Sexual harassment of any kind.
- ✘ Intimidating or offensive acts of any kind.
- ✘ Creating a threatening or hostile work environment.

Understanding Sexual Harassment Prohibited Conduct



- Continued and repeated verbal abuse of a sexual nature, sexually related comments and joking, graphic or degrading comments about an employee's appearance;
- Continued and repeated display of sexually suggestive objects or pictures, including cartoons or vulgar email messages; and
- Any uninvited physical contact or touching, such as patting, pinching or repeated brushing against another's body.

Such conduct may constitute sexual harassment regardless of whether the conduct is between members of Management, between Management and staff employees, between staff employees, or directed at employees by non-employees conducting business with MBI, regardless of gender or sexual orientation.

Harassment by Non-Employees

MBI will also endeavor to protect employees, to the extent possible, from harassment by non-employees in the workplace, including customers, clients and suppliers.

Complaint Procedure and Investigation

If an employee feels they have been, or is being subjected to a demeaning work environment, is being harassed for sexual or other reasons, or is aware of such conduct in the workplace, they should immediately do one of the following so corrective action can be taken:

- If you feel comfortable doing so, advise the person(s) doing the harassing that their behavior is offensive to you. Ask them to refrain from whatever they are doing or saying.
- If the harassment continues or if you are uncomfortable approaching the person doing the harassing, you should report the matter to your immediate Manager.
- If the immediate Manager is part of the problem, or is aware of the problem and has not taken corrective action, then you should direct your complaint to Senior Management.

MBI will conduct a prompt investigation as confidentially as possible under the circumstances. Employees who raise concerns and make reports in good faith, can do so without fear of reprisal. All employees have an obligation to cooperate with MBI in enforcing this policy and investigating and remedying complaints.

Any employee who becomes aware of possible sexual harassment or other illegal harassment or discrimination against others, should promptly advise an appropriate member of Management.

Anyone found to have engaged in such wrongful behavior will be subject to appropriate discipline, which may include termination.

All members of Management are required to immediately report any complaints, observations or concerns of sexual harassment, or other illegal harassment or discrimination to Senior Management. Even if an employee requests that nothing be done, or that no one else be told, a Manager is required to report any complaint to Senior Management and should also inform the employee.

Managers who fail to report complaints, observations or concerns of harassment may be subject to discipline. Managers who retaliate against an employee who complains about harassment or discrimination, or participates in any investigation, may also be subject to discipline, including termination.

Retaliation

Any employee who files a complaint of sexual harassment or other unlawful harassment or discrimination in good faith, will not be adversely affected in terms and conditions of employment, and will not be discriminated against or discharged because of the complaint.

In addition, we will not tolerate retaliation against any employee who, in good faith, cooperates in investigating a complaint. Anyone who engages in such retaliatory behavior will be subject to appropriate discipline, up to and including termination.

Training

MBI provides proper training for all employees concerning their rights to be free from sexual harassment and other discrimination, and steps they can take to stop it.

Reporting Procedures:

Any potentially dangerous situations must be reported immediately to your Manager. Reports can be made anonymously, and all reported incidents will be investigated. Reports or incidents warranting confidentiality will be handled appropriately and information will be disclosed to others only on a need-to-know basis. All parties involved

ZERO TOLERANCE FOR WORKPLACE VIOLENCE

in a situation will be counseled and the results of investigations will be discussed with them. MBI will actively intervene should there be any indication of a hostile or violent situation.

2.2 | WORKPLACE VIOLENCE – ZERO TOLERANCE

Purpose

To establish a procedure that prohibits violence in the workplace.

Definitions

- A.** Third Parties: Individuals who are not MBI employees, such as relatives, acquaintances or strangers.
- B.** Workplace: Any location, either permanent or temporary, where an employee performs any work-related duty. This includes, but is not limited to, the buildings and the surrounding perimeters, the parking lot, alternate work locations, and travel to and from assignments.

Prohibited Actions

Prohibited conduct includes, but is not limited to:

- Injuring another person physically;
- Engaging in behavior that creates reasonable fear of injury to another person;
- Intentionally damaging property;
- Threatening to injure an individual or to damage property;
- Committing injurious acts motivated by, or related to, domestic violence or sexual harassment; and

- Retaliating against any employee who, in good faith, reports a violation of this policy.
- Aggressive or hostile behavior that creates a reasonable fear of injury to another person or subjects another individual to emotional distress.

Policy Violations

Employees violating this policy will be subject to disciplinary action, up to and including termination, based on the situation.

Violent acts of employees occurring outside the workplace also may be grounds for disciplinary action, up to and including termination. In these situations, it must be demonstrated in writing that the violent conduct committed has an adverse impact on the employee's ability to perform the assigned duties and responsibilities, or that it undermines the effectiveness of activities.

Violators

Persons found to have violated this policy will be subject to disciplinary action(s) up to and including termination.

2.3 | DOMESTIC VIOLENCE LEAVE LAW

The law, effective July 1, 2007, requires employers with 50 or more employees to provide up to 3 days' leave for a variety of activities connected with domestic violence issues. Employees who have worked for MBI for 3 months or longer are eligible. Whether leave is paid or unpaid is at the discretion of MBI.

The law covers leave for specific activities such as:

- Seeking an injunction for protection against domestic violence or repeat violence, or sexual violence;
- Obtaining medical care or mental health counseling, or both, for the employee or a family or household member, to address injuries resulting from domestic violence;
- Obtaining services from victims services organizations, such as a domestic violence shelter or rape crisis center;

- Making the employee's home secure from the perpetrator of domestic violence or finding a new home to escape the perpetrator; and
- Seeking legal assistance to address issues arising from domestic violence, attending or preparing for court related proceedings arising from the act of domestic violence.

Employees are required to provide appropriate advance notice of the need for leave, unless prevented from doing so because of imminent danger to the health or safety of the employee or a family member. Also, employees must first exhaust any available vacation time.

MBI is required to keep confidential all information relating to leave for domestic violence.

2.4 | GUNS AT WORK POLICY

Per state law, employees may keep firearms locked and concealed in their locked personal vehicles while parked on MBI premises as long as the employee may legally possess or carry a concealed weapon.

MBI POSTS SIGNS ON ALL ENTRANCES

No person shall knowingly possess, have under the person's control, convey, or attempt to convey a deadly weapon or dangerous ordnance onto these premises.



Unless otherwise authorized by law, no person shall knowingly possess, have under the person's control, convey, or attempt to convey a deadly weapon or dangerous ordnance onto these premises.

2.5 | CODE OF ETHICS

MBI expects the highest standard of ethical conduct and fair dealing from each employee and all others associated with the company. Our reputation is a valuable asset and we must continually earn the

trust, confidence and respect of our suppliers, our clients and our community.

This policy provides general guidance on the ethical principles that we all must follow. But no guideline can anticipate all situations. You should also be guided by basic honesty and good judgment, and be sensitive to others' perceptions and interpretations.

If you have any questions about this policy, consult your Manager.

You are expected to promptly disclose to the Management of MBI anything that may violate this policy. We will not tolerate retaliation or retribution against anyone who brings violations to Management's attention.

Complying with Laws and Regulations

All our activities are to be conducted in compliance with the letter and spirit of all laws and regulations. You are charged with the responsibility of understanding the applicable laws, recognizing potential dangers — and knowing when to seek legal advice.

Giving and Receiving Gifts

You may not give or receive money or any gift to or from a supplier, government official, organization or co-worker.

You may accept meals and refreshments if they are infrequent and are in connection with business discussions.

Employee Privacy and Other Confidential Information

MBI collects only personal information about employees that relates to their employment. Only people with a business-related need to know are given access to this information and Senior Management must authorize any release of the information to others. Personal information, other than that required to verify employment or to satisfy legitimate investigatory or legal requirements, would be released outside the Company only with employee's approval.

If you have access to any confidential information, including private employee information, you are responsible for acting with integrity. Unauthorized disclosure or inappropriate use of confidential information will not be tolerated.

Accounting and Financial Reports

MBI's financial statements, and all books and records on which they are based, must accurately reflect the Company's transactions. All disbursements and receipts must be properly authorized and recorded.

You must record and report financial information accurately. Reimbursable business expenses must be reasonable, accurately reported and supported by receipts.

Those responsible for handling or disbursing funds, must assure that all transactions are executed as authorized and recorded to permit financial statements, in accord with Generally Accepted Accounting Principles.

Compliance

Employees who fail to comply with this policy will be disciplined, which may include a demand for reimbursement of any losses or damages, termination of employment and referral for criminal prosecution. Action will also be taken against Managers or others who fail to report a violation or withhold relevant information concerning a violation of this policy.

Nothing in this policy is intended to negate an employee's rights under the NLRA.

2.6 | EQUAL OPPORTUNITY

To assist employees who are or become disabled and those employees who suffer on-the-job injuries, we will make reasonable accommodations to enable such employees to continue performing



MBI provides equal opportunities to all qualified employees and job applicants without regard to race, sex, age, color, marital status, religion, veterans status, disability, national origin, or other protected classes as provided by applicable law.

the essential functions of their jobs. Consistent with this policy, we may modify job duties to comply with medical requirement or restrictions. Other accommodations, such as transfer to a vacant position for which the employee is qualified, may be appropriate, depending upon specific facts and circumstances of individual situations.

Obviously, there are limits to the accommodations which we can realistically make. For example, where an accommodation would cause undue hardship to the Company we would be unable to make the particular accommodation. Similarly, where placing an individual in a position with or without accommodation, would cause the employee to be a direct threat to the employee or others, we may be unable to place the employee in a particular position. Only Human Resources or Senior Management may approve accommodation requests.

2.7 | CONFIDENTIAL INFORMATION AND CONFLICT OF INTEREST

Confidentiality Agreement

Information that pertains to MBI's business, including all nonpublic information concerning the Company, its vendors and suppliers, is strictly confidential and must not be given to people who are not employed by MBI.

Please help protect confidential information — which may include, for example, trade secrets, customer lists and Company financial information — by taking the following precautionary measures:

- Discuss work matters only with other MBI employees who have a specific business reason to know or have access to such information;
- Do not discuss work matters in public places;
- Monitor and supervise visitors to MBI to ensure that they do not have access to confidential information;
- Destroy hard copies of documents containing confidential information that is not filed or archived; and
- Secure confidential information in desk drawers and cabinets at the end of every business day.

Your cooperation is particularly important because of our obligation to protect the security of our clients' and our own confidential information. Use your own sound judgment and good common sense, but if at any time you are uncertain as to whether you can properly divulge information or answer questions, please consult Management.

It is the Company's policy to defend and prosecute any disclosure of misappropriation of the Company's trade secrets to the full extent allowed by federal, state, and common law. Accordingly; the Company hereby provides employees with the following notice concerning immunity from liability for confidential disclosure of a trade secret to the government or in a court filing: Pursuant to the Defend Trade Secrets Act, 18 U.S.C. § 1833. an individual shall not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that is made (a) in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney, and solely for the purpose of reporting or investigating a suspected violation of law, or (b) in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal.

Nothing in this policy is intended to interfere with employee rights under the national Labor Relations Act.

Conflict of Interest

Employees must avoid any interest, influence or relationship that might conflict or appear to conflict with the best interests of MBI. You must avoid any situation in which your loyalty may be divided — and promptly disclose any situation where an actual or potential conflict may exist.

Examples of potential conflict situations include:

- Having a financial interest in any business transaction with MBI;
- Owning or having a significant financial interest in, or other relationship with, a MBI competitor, customer or supplier; and
- Accepting gifts, entertainment or other benefit of more than a nominal value from a MBI competitor, customer or supplier.

Anyone with a conflict of interest must disclose it to Management and remove themselves from negotiations, deliberations or votes involving the conflict. You may, however, state your position and answer questions when your knowledge may be of assistance.

2.8 | IMMIGRATION REFORM AND CONTROL ACT

As required by the federal Immigration Reform and Control Act of 1986 (IRCA), MBI only employs individuals who are authorized to work in the United States. Each new employee, as a condition of employment, must complete the Employment Eligibility Verification Form I-9 and present documentation establishing identity and employment eligibility.

If an employee is authorized to work in this country for a specified period of time, proof of renewed employment eligibility must be provided prior to the expiration of the current authorization period in order to remain employed.

2.9 | ACCOMMODATION FOR PREGNANT EMPLOYEES

In accordance with the federal Pregnant Workers Fairness Act (PWFA) and applicable state law, MBI will provide reasonable accommodation to pregnant employees for known limitations related to pregnancy, childbirth, or other related medical conditions unless the accommodation will cause an undue hardship on the Company.

If the employee has a known temporary limitation, whether episodic, short-term, or necessary throughout the pregnancy, MBI will offer reasonable accommodations, with or without requiring documentation from a health care provider.

Certain accommodations will be considered reasonable without requiring documentation including:

- Extra bathroom breaks;
- Keeping water or other drinks nearby;
- Additional breaks to eat or drink; or

- Allowing sitting or standing, as necessary.

Examples of potential reasonable accommodations for which MBI may require documentation for a health care provider include, but are not limited to:

- Schedule changes or time off to go to health care appointments;
- Job restructuring;
- Temporary reassignment to another position;
- Modification to the personal appearance requirements;
- Leave to recover from childbirth.

If you require an accommodation, notify your supervisor or Human Resources. If the need for a particular accommodation is not obvious, you may be asked to include relevant information such as:

- The reason you need an accommodation;
- A description of the proposed accommodation; and
- How the accommodation will address limitations caused by pregnancy, childbirth, or related medical conditions.

MBI will not require you to accept any accommodation without engaging in the interactive process to accurately understand your limitations and explore potential accommodations. MBI is not required to provide your specific requested accommodation and is not required to provide any accommodation that would constitute an undue hardship on the company.

If leave is provided as a reasonable accommodation, it may run concurrently with leave under any other leaves permitted by company policy or by federal, state, or local law. MBI will comply with state or local laws that provide additional protections beyond those outlined in the PWFA. MBI will not retaliate against employees who request or receive an accommodation under this policy.

3

EMPLOYEE RELATIONS



3.1 | EMPLOYMENT CLASSIFICATIONS

Employees at MBI are either full-time or part-time, exempt or non-exempt.

Full-time Employees – Overtime pay at a rate of not less than one and one-half times their regular rates of pay is required after 40 hours of work in a workweek.

Part-time Employees – Work fewer than 30 hours per week. Part-time employees are not eligible for any benefits other than wages and ESOP benefits (*see section 4.3*) if the 1000 hour requirement is met.

Exempt Employees – not entitled to overtime pay.

Non-Exempt Employees – are entitled to overtime pay.

The **Federal Labor Standards Act (FLSA)** contains some exemptions from these basic standards. Some apply to specific types of businesses; others apply to specific kinds of work.

While FLSA does set basic minimum wage and overtime pay standards, and regulates the employment of minors, there are a number of employment practices which FLSA does not regulate.

For example, FLSA does not require:

- Vacation, holiday, severance or sick pay;
- Meal or rest periods;
- Holidays or vacation time off;
- Premium pay for weekend or holiday work;
- Pay raises or fringe benefits; and
- A discharge notice, reason for discharge, or immediate payment of final wages to terminated employees.

Also, FLSA does not limit the number of hours in a day or days in a week an employee may be required or scheduled to work, including overtime hours, if the employee is at least 16 years old.

3.2 | INTRODUCTORY PERIOD

The first 90 days of employment are an Introductory Period for both the employee and the Company. During and after this period, the work relationship will remain at will.

This time period allows you to determine if you have made the right career decision and for MBI to determine whether your initial work performance meets our needs. Your Manager will monitor your work performance, attitude and attendance during this time and will be available to answer any questions or concerns you may have about your new job.

Holiday pay and bereavement leave do not accrue during this period.

3.3 | WORK HOURS

Each employee is expected to complete a normal workday and work week, and work whatever reasonable additional hours (previously approved by the Manager) required to meet Company needs. Due to the nature of our business, the hours of work may vary during certain times of the week. Your Manager will inform you of your work schedule.

Rest Periods

Full-time employees are entitled to, however not required to take, two 10-minute breaks for rest each day. Break time for employees should be 2 hours after their scheduled start time and 2 hours before the end of their schedule.

On-Call Time

An employee who is required to remain on call on the employer's premises is working while "on call." An employee who is required to remain on call at home, or who is allowed to leave a message where they can be reached, is not working (in most cases) while on call. Additional constraints on the employee's freedom could require this time to be compensated.

Employees are also entitled to an unpaid break for meals during each work period. Your Manager will inform you of your scheduled break and/or lunch periods. You must clock out for lunch breaks (whether

or not you leave the building) or any time you leave the premises for personal business.

3.4 | PAY PRACTICES

Employees will be paid every other Friday. If the regular payday falls on a holiday, payday will be the last regular workday before the holiday. The pay week starts at the beginning of your shift on Sunday and includes all work you perform up to the close of business on Saturday.

Time Records

Your Manager will instruct you about how to account for and record the time you spend working. Failing to record work-time is a violation of Company policy and may result in disciplinary action, including termination.

General Pay Information

Certain deductions will be made in accordance with federal and state laws. In addition, MBI makes available certain voluntary deductions as part of the Company's benefits program. If an employee elects supplemental coverage under one of MBI's benefits plans, which requires employee contributions, the employee's share of the cost will be deducted from their check each pay period. If the employee is not receiving a payroll check due to illness, injury or leave of absence, they will be required to pay the bi-weekly cost directly to the Company.

3.5 | COMPANY-ISSUED CHECK POLICY (NON-PAYROLL)

Purpose

To minimize administrative costs and bank fees associated with uncashed, lost, or reissued company-issued checks that are not related to payroll or wages.

Scope

This policy applies to **all non-payroll checks**, including but not limited to:

- Refunds
- Spiffs
- Reimbursements
- Other company-issued payments not classified as wages or salary

This policy **does not apply to payroll checks or wages.**

Policy

Employees are responsible for safeguarding and timely depositing or cashing any non-payroll check issued to them by the Company.

- Non-payroll checks must be deposited or cashed within 120 days of the issue date.
- Checks not deposited or cashed **within 120 days** will be considered stale and will require a stop payment and reissuance.
- If a non-payroll check is **lost, stolen, or misplaced**, a stop payment must be issued before a replacement check can be provided.

Stop Payment Fee

Any stop payment required due to:

- Failure to deposit or cash a non-payroll check within 120 days, **or**
- Loss, theft, or misplacement of a non-payroll check will result in a **\$35.00 stop payment fee**, which will be **the responsibility of the employee.**

The Company may deduct the \$35.00 fee from the reissued check or require reimbursement, **where permitted by law.**

Exceptions

Stop payment fees will not be charged when the reissuance is due to:

- A Company processing or issuance error
- Bank processing errors
- Other circumstances deemed reasonable by management

Acknowledgment

By accepting non-payroll payments from the Company, employees acknowledge and agree to comply with this policy.

3.6 | OVERTIME

Because of the nature of work, employees may be asked to work overtime on weekends or holidays or additional hours during the regular workday, and are expected to comply with such requests.

Overtime compensation is paid to all non-exempt employees at one and one-half times their straight time rate for all hours worked in excess of 40 hours per week.

If you are classified as non-exempt, you must receive authorization from your Manager before working overtime.

Overtime pay is based on actual hours worked. Time taken for lunch or dinner is not included as time worked for purposes of computing overtime. Time off for holidays, sick leave, vacation leave, personal leave, medical leave, training seminars, or any leave of absence will not be factored in as hours worked when calculating it.

3.7 | PERFORMANCE PROGRESS AND APPRAISAL PLAN

Managers and employees are strongly encouraged to document and discuss job performance and goals informally at any time. Additional, pay reviews will be conducted to provide both managers and employees with the opportunity to discuss job tasks, identify and correct weaknesses, encourage and recognize strengths, and discuss positive, purposeful approaches for meeting goals. These pay reviews will be conducted at least annually. Wage/salary increases are based on those reviews, as well as MBI's profitability.

3.8 | JOB PROMOTIONS AND TRANSFERS

MBI has a job posting program to inform employees of available staff positions.

To apply for a posted position, an employee must:

- Have completed any mandatory Introductory Period at a satisfactory performance level;
- Meet the minimum requirements for the position; and
- Not have received written corrective counseling within the past 90 days; employees who have received a verbal warning may also be prohibited from applying.

Those interested in applying for a posted position should submit a memorandum, with an updated resume, to Management indicating interest in the position. Qualified employees must inform their Manager that they have applied for the job.

3.9 | ATTENDANCE POLICY

It is MBI's policy to keep employee absences to a minimum. Employees are expected to report on time each day they are scheduled to work. Absence or tardiness may result in disciplinary action, including termination. Absence is defined as the unexcused failure to report to work, and remain at work as scheduled. This includes late arrival at work and leaving early. Attendance is one of the factors rated in pay reviews.

Responsibility

All employees are responsible for accurately recording all hours worked. Managers of each area are responsible for verifying all information on employee's time sheets before approving them, and ensuring that the reports are accurate and submitted on a timely basis.

Disciplinary Action

If an employee is excessively tardy without a good or protected reason, 4 or more times during any 90 day period, Management must determine if disciplinary action, including termination, is warranted.

Disciplinary action or termination will be taken if employees:

- Are excessively absent or excessively tardy;
- Fail to give notice of absences as required;
- Falsify their time sheets; or

- Remain absent from work for 3 consecutive workdays without contacting their Manager, unless they are on approved leave. This is otherwise considered job abandonment and will result in discharge.

Reporting Absences

When an employee will be absent from work for any reason, they must report the absence to their Manager before their regular start time. This notification is required for each day absent unless it is understood the employee will be absent for a certain number of days.

Failure to notify your Manager of any absence may result in disciplinary action or termination.

MBI recognizes that, due to unforeseen circumstances, employees may be late getting to work. Employees must report to their Manager and provide notification that they will be late for work, the reason for the delay, and the approximate time they expect to arrive at work.

Employees should clock in no more than 10 minutes prior to their scheduled start time. Employees are considered tardy if they clock in 5 minutes or more past their scheduled start time.

Requesting Time Off

Employees who anticipate time off (paid or unpaid) such as vacation time, personal time, or medical time, must log on to the payroll portal and submit the requested time off. After a request is made, the Manager will be sent an email notice and will approve or deny the request. The request should be made as far in advance as possible. The employee will be notified via email or by their Manager (if employee does not have an email address) to let them know if their request has been approved or denied.

3.10 | FREEDOM OF DISCUSSION WITH MANAGEMENT

Employees are encouraged to bring concerns, problems and grievances to Management's attention.

3.11 | SOLICITATION AND DISTRIBUTION

To prevent disruptions in business or interference with work, and to avoid personal inconvenience, MBI has adopted rules about soliciting, for any cause, and distributing literature of any kind in the workplace.

Employees may not solicit on MBI property during working time or use Company facilities for solicitation. This policy applies to collecting funds, requesting contributions, selling merchandise, gathering employee signatures and promoting membership in clubs or organizations.

Working time means time during which employees are expected to be actively engaged in their assigned work; it does not include scheduled meal or break periods.

You may solicit another employee only if both you and the other employee are not on work time. You may distribute literature only in nonworking areas and while not on work time — to other employees who are not on working time.

Non-employees may not make solicitations or distribute literature at any time. MBI may grant limited exemptions from these rules for charitable purposes at our discretion.

Nothing in this policy is intended to negate an employee's rights under the NLRA.

3.12 | STANDARDS OF CONDUCT AND DISCIPLINE

MBI expects every employee to adhere to the highest standards of job performance and of personal conduct, including individual involvement with MBI personnel and outside business contacts. We wish to put forth an image that will make us all proud to be MBI employees. A high degree of professionalism is expected in your attitude and behavior.

We reserve the right to discipline or discharge any employee for violating any Company policy, practice or rule of conduct.

The following list is intended to give you notice of our expectations and standards. However, it does not include every type of unacceptable behavior. Be aware that MBI retains the discretion to determine the nature and extent of any discipline based upon the circumstances of each individual case.

Employees may be disciplined or terminated for poor job performance, including, but not limited to:

- Unsatisfactory quality or quantity of work;
- Repeated unexcused absences or tardiness;
- Failing to follow instructions or Company procedures; or
- Failing to follow established safety regulations.

Employees may also be disciplined or terminated for misconduct (misconduct is defined as any action that demonstrates conscious disregard of an employer's interests and is found to be a deliberate disregard or violation of reasonable standards of behavior, and may include activities that did not occur at the workplace or during working hours.), including:

- Falsifying an employment application or any other Company records or documents;
- Failing to record working time accurately or recording a co-worker's time;
- Insubordination or other refusal to perform;
- Using vulgar, profane or obscene language including any communication or action that violates our policy against employment harassment and other discrimination;
- Disorderly conduct, fighting or other acts of violence;
- Misusing, destroying or stealing Company property or another person's property;
- Possessing, selling, using or reporting to work under the influence of alcohol, controlled substances or illegal drugs on Company property or on Company time;
- Violating conflict of interest rules;
- Disclosing or using confidential or proprietary information without authorization; or
- Violating the Company's computer or software use policies; and

- Being convicted of a crime that indicates unfitness for a job or threatens the Company or its employees in any way.

Progressive Discipline

MBI retains the discretion to discipline its employees. Oral and written warnings and progressive discipline (progressive discipline is defined as the process of using increasingly severe steps or measures when an employee fails to correct a problem after being given a reasonable opportunity to do so), up to and including discharge, may be administered as appropriate under the circumstances.

SECTION 3.13 | DEDUCTIONS FROM EXEMPT EMPLOYEE SALARY

Exempt employees are paid on a salary basis and are generally paid their full salary for any week in which they perform work. However, their pay may be reduced at the discretion of MBI in the following circumstances:

1. Employees who are absent for at least a full day because of sickness, disability, or personal reasons may not be paid for that day unless they have accrued benefits under the Company's combined leave, sickness, or disability policy. Their pay will not be reduced if they are absent for less than a full day because of sickness or disability, or personal reasons. However, an employee's leave balance will be reduced by the amount of time the employee is absent from work, even if the time absent is less than a full day.
2. Employees who are absent from work for jury duty, attendance as a witness at a trial, or temporary military leave may have their pay reduced by the amount of payment they receive in the form of jury fees, witness fees, or military pay. Their pay will not be reduced by the number of hours or days they are absent from work unless they perform no work in a given week, and then their pay may be reduced at the discretion of the Company.
3. If an employee violates a safety rule of major significance, their pay may be reduced in an amount to be determined by the Company as a penalty for that violation.

4. Employees may be suspended without pay if they are found to have violated one of MBI's policies regarding proper workplace conduct, but only in full-day increments. Their pay will be reduced in an amount that is proportionate to the number of days suspended.
5. Any unpaid time taken under the Family and Medical Leave Act (if applicable), whether partial or full-day absences.
6. Employees who work less than 40 hours during their first or last week of employment will be paid a proportionate part of their full salary for the time actually worked.

MBI will reimburse any exempt employee whose pay is inadvertently reduced in violation of this policy. If you feel your pay has been improperly reduced, please notify the Owner as soon as possible.

SECTION 3.14 | LACTATION BREAKS FOR NURSING MOTHERS

As part of our family-friendly policies and benefits, MBI supports breastfeeding mothers by accommodating the mother who wishes to express breast milk during her workday when separated from her newborn child.

For up to one (1) year after the child's birth, any employee who is breastfeeding their child will be provided reasonable break times to express breast milk for their baby. MBI will designate an area (not a restroom) for this purpose.

When applicable, a small refrigerator or a section in the company's refrigerator reserved for the specific storage of breast milk may be made available upon request. Any breast milk stored in the refrigerator must be labeled with the name of the employee and the date of expressing the breast milk. Any nonconforming products stored in the refrigerator may be disposed of. Employees storing milk in the refrigerator assume all responsibility for the safety of the milk and the risk of harm for any reason, including improper storage, refrigeration, and tampering. Nursing mothers needing lactation

breaks or accommodation must contact their manager or the VP of Administration.

As with other break periods, lactation breaks of more than 10 minutes in length will be unpaid for non-exempt employees who should indicate this break period on their time.

Employees in Georgia will be permitted protections under this policy for the first 24 months after the birth of their child.

3.15 | SHOULD YOU LEAVE US

Employment with MBI is on an “at-will” basis, and may be terminated with or without cause or notice. Similarly, employees are free to resign their employment at any time. If at any time it is necessary for an employee to resign their employment with MBI, the Company requests at least 2 weeks notice. Failure to provide a 2 week notice, and completion of the notice, may lead to forfeiture of accrued vacation or other benefits at the discretion of the Company. Any employee who is discharged by MBI shall be paid only wages accrued to the effective date of the separation.

4

EMPLOYEE BENEFIT PROGRAMS



MBI provides a well-balanced program of benefits designed to meet the needs of employees. A number of the benefit programs — such as social security, workers' compensation, state disability and unemployment insurance — cover all employees as required by law.

Eligibility for most benefits depends upon a variety of factors, including employee classification. Your Manager can identify the programs for which you are eligible. You can find the details of many of these programs in separate written summaries which are controlling.

We reserve the right to add, amend, modify or terminate any employee benefit plans or programs. MBI has no control over the decisions of any benefit provider.

Currently, MBI offers group health, dental insurance, vision insurance, life insurance supplemental insurance, 401(k) and ESOP plans.

4.1 | GROUP HEALTH INSURANCE

MBI offers group health insurance to full-time employees who are scheduled to work 30 hours or more per week. Coverage will become effective on the first day of the month following 60 days of continuous employment. Refer to the printed information from the insurance provider for details of coverage. MBI pays a portion of the cost of this plan for full-time employees. For your convenience, premiums are paid through payroll deduction.

4.2 | DENTAL, LIFE, VISION, SUPPLEMENTAL INSURANCE

Dental, vision, life and supplemental insurance are available to all full-time employees. Refer to the printed information



from the insurance provider for details of coverage. For your convenience, premiums are paid by the employee through payroll deduction. This coverage becomes effective at the same time as the group health insurance.

If a covered employee dies, the life insured amount will be paid to their named beneficiary. You are responsible for naming your beneficiary and may change that selection by requesting a Change of Beneficiary form from Management.

Supplemental life insurance, short-term disability, accident expense and cancer protection is also available to all full-time employees. Refer to the printed information from the insurance provider for details of coverage. The cost of these supplemental insurance plans will be the employee's responsibility. For your convenience, premiums are paid through payroll deduction. The coverage becomes effective at the same time as the group health insurance.

4.3 | ESOP AND 401(K) PLANS

The MBI Employee Stock Ownership Plan and Trust (ESOP) has been adopted to provide you with additional income for retirement. The purpose of ESOP is to enable you to participate in the growth and prosperity of the Company by making you a stockholder. Participation begins after a 12 consecutive month period in which you have completed 1,000 hours of service and you are 21 years of age or older. Entry dates are January 1st, April 1st, July 1st and October 1st. As a stockholder, you are a "beneficial" owner of MBI. Your efforts added to the efforts of all other employees, contribute to the profitability and growth of the Company and thereby increase the value of Company stock and your benefits from the ESOP.

Consequently, our contributions made to the ESOP will be invested primarily in Company stock. If we do well, and the value of MBI stock increases, you will share in its improved performance through your interest in the ESOP. When you retire, you will be entitled to receive, the value of the amounts which have accumulated in your ESOP account.

The MBI Employee Stock Ownership Plan and Trust (ESOP) has been adopted to provide you with additional income for retirement. The purpose of ESOP is to enable you to participate in the growth and prosperity of the Company by making you a stockholder. As a stockholder, you are a "beneficial" owner of MBI.



Employees have the option to enroll in our 401(k) plan. Participation may begin on the first day of the month after a 6 consecutive month period and you have reached 21 years of age or older. Entry dates are January 1st and July 1st. This means that you now have the opportunity to begin contribution to your retirement account and enjoying the tax advantage benefits of a 401(k) plan. More and more employees realize that they must save money on their own for a sound retirement. Employer-provided retirement plans, such as 401 (k) plans can help you meet your financial goals.

4.4 | COBRA

The Consolidated Omnibus Budget Reconciliation Act (COBRA) gives workers and their families who lose their health benefits, the right to choose to continue group health benefits provided by their group health plan for limited periods of time under certain circumstances, such as voluntary or involuntary job loss, reduction in the hours worked, transition between jobs, death, divorce and other life events. Qualified individuals may be required to pay the entire premium for coverage up to 102% of the cost to the plan.

COBRA generally requires that group health plans sponsored by employers, with 20 or more employees in the prior year, offer employees and their families the opportunity for a temporary extension of health coverage (called continuation coverage) in certain instances where coverage under the plan would otherwise end. COBRA outlines how employees and family members may elect continuation coverage. It also requires employers and plans to provide notice.

4.5 | HOLIDAYS

MBI observes the following holidays:

New Year's Day	Labor Day
Memorial Day	Thanksgiving
Independence Day	Christmas

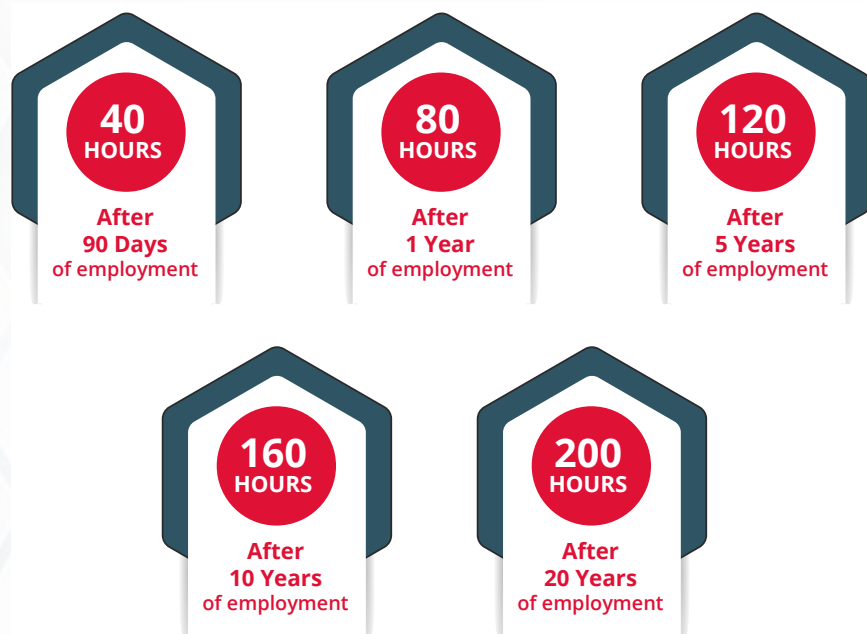
You will be paid for these holidays if you:

- Are a full-time employee who has worked at least 90 days at MBI; and
- Have worked the full scheduled day before and the full scheduled day after the holiday — unless time off has been approved in advance as vacation.

Holidays that fall on a weekend will be observed either on a Friday or Monday. To avoid confusion, all holidays will be announced in advance.

4.6 | VACATIONS

MBI provides paid vacations for eligible employees.



Only active, full-time employees are eligible for paid vacation, and all vacation must be earned before being taken.

Except in exceptional circumstances, for which a Manager's advance written approval is necessary, no employee may accrue unused vacation from year to year. If vacation time is not used by your anniversary date, it will be lost.

Should a Company holiday occur during your vacation, you may add an additional day, either at the beginning or end of the vacation period, with your Manager's approval.

MBI reserves the right not to approve a vacation request if it will interfere with Company operations. Whenever possible, employees' requests for vacation will be accommodated, but where scheduling conflicts arise, seniority will prevail.

4.7 | WORKERS' COMPENSATION

MBI provides insurance to compensate for any occupational illness or injury an employee might suffer in the course of work. MBI has agreed to provide workers' compensation coverage for health care services for work-related injuries/illnesses through a managed care arrangement according to Florida law.

If you are injured on Company premises or while traveling on official Company business, notify your Manager immediately. You must complete a report for every injury, no matter how small, to keep the coverage in force and to get any compensation to which you may be entitled. Any time lost by an employee due to an occupational illness or injury covered by workers' compensation insurance will be credited as active service for all Company benefits.

4.8 | JURY DUTY

A leave of absence for jury duty will be granted to any full-time or part-time employee who has been notified to serve. During this leave, employees will be compensated in accordance with the Florida Statute 40.24 (3) (a). Employees will continue to receive regular wages while serving as a juror for the first day of juror service. Each employee who serves more than 3 days is entitled to be paid by the state for

the fourth day of service and each day thereafter. Employees are not entitled to additional reimbursement by MBI or the state for travel purposes or other out-of-pocket expenses.

Upon receipt of the notice to serve jury duty, the employee should immediately notify their Manager, and provide a copy of the notice to serve jury duty.

If employees are dismissed from jury duty before the end of the workday, they must contact their Manager for instructions on whether to return to work for the rest of the workday.

Upon the employee's return, the employee must notify their Manager and submit a signed Certificate of Jury Service indicating the number of days served.

If the jury duty falls at a time when the employee cannot be away from work, MBI may request that the court allow the employee to choose a more convenient time to serve if they make a request in accordance with the court's procedures. The employee must cooperate with this request.

Time Off from Work in Connection with Court Cases

We recognize that an employee might be subpoenaed or otherwise required to serve as a witness in court cases or arbitrations.

Employees called to testify will not be paid for the time they are away from work as a result of their participation in a court case or arbitration, but may use available vacation to cover their time away from work. Absence as a result of participation in a court case or arbitration will be treated the same as absence for any other reason and employees must comply with the Company's policy regarding attendance. If you are called to serve as a witness, notify your Manager as soon as possible.

4.9 | BEREAVEMENT LEAVE

Full-time employees who have worked at MBI for at least 90 days are permitted up to seven consecutive work days with pay to attend the funeral of an immediate family member — which includes a parent, step-parent, foster parent, spouse, child, stepchild, foster child, brother, sister or grandparent.

Eligible employees may be permitted three work days with pay for the death of a relative who is not an immediate family member — including an aunt, uncle, nephew, niece, brother-in-law, sister-in-law or parent in-law.

Your Manager must approve all bereavement leave. MBI may request verification of the facts surrounding the leave and grant or deny the leave as deemed appropriate. Bereavement leave will not be paid if it occurs when the employee is on a leave of absence, absent due to illness or injury, or not working due to a paid holiday.

4.10 | MILITARY, RESERVE OR NATIONAL GUARD LEAVE OF ABSENCE

MBI will comply with the Uniformed Services Employment of Reemployment Rights Act of 1994 (USERRA) and all other state and federal laws in connection with any military, reserve or National Guard leave of absence. If you enlist or enter active duty, whether voluntary or involuntary, with any uniformed services of the United States, please provide oral or written notice as quickly as possible to your Manager, so that the Company can provide you with information regarding USERRA and make appropriate arrangements for your leave.

4.11 | FAMILY AND MEDICAL LEAVE ACT (FMLA)

You are eligible for family and medical leave if you have worked for MBI for at least 12 months and have put in at least 1,250 hours during the 12-month period before the leave is to begin.

Reasons for the Leave

Leave under this policy is limited to a maximum of 12 weeks in a 12 month period (fiscal year) for:

- The birth of a child and to care for the newborn child within one year of birth;
- The placement with the employee of a child for adoption or foster care and to care for the newly placed child within one year of placement;

- To care for the employee's spouse, child, or parent who has a serious health condition;
- A serious health condition that makes the employee unable to perform the essential function of their job; and
- Any qualifying exigency arising out of the fact that the employee's spouse, son, daughter, or parent is a covered military member on "covered active duty" (as defined by the FMLA).

Leave under this policy is limited to a maximum of 26 weeks in a 12 month period (fiscal year) to care for a covered service member with a serious injury or illness who is the spouse, son, daughter, parent, or next of kin to the employee (military caregiver leave).

A serious health condition means an illness, injury, impairment, or physical or mental condition during which you are incapable of working, that involves either:

- Treatment requiring in-patient care in a hospital, hospice or residential medical care facility; or
- Continuing treatment by a health care provider for a condition that lasts more than three consecutive days, or for pregnancy or prenatal care or for a chronic serious health condition which continues over an extended period of time, requires periodic visits to a health care provider and may involve occasional episodes of incapacity, such as serious asthma or diabetes.

It also includes a permanent or long-term condition for which treatment may not be effective, such as Alzheimer's, a severe stroke and terminal cancer. In addition, leave may be used to cover absences due to multiple treatments for restorative surgery or for a condition which would likely make you incapable of working for more than three days if not treated, such as chemotherapy or radiation treatments for cancer.

Substituting Paid Leave

You must first use accrued vacation for family and medical leave. If the request for leave is due to your own serious health condition, you must first exhaust all accrued vacation. **Your total FMLA leave time — which may include paid vacation — may not exceed 12 weeks.** If you are on unpaid leave, you are not entitled to continue accruing paid leave benefits.

Types of Leave

Leave due to the birth or placement of a child must be taken in one continuous 12-week segment, and must be taken within 12 months of the birth or placement of the child. You may take leave due to your own or a family member's serious health condition in:

- One continuous 12-week segment;
- An intermittent schedule, such as one day off each week; or
- A reduced schedule, such as beginning 2 hours late, twice a week.

Notice of Leave

If your need for leave is foreseeable, you must give 30 days prior notice if possible.

If your need for leave is due to a planned medical treatment, make every attempt to schedule the treatment so as not to unduly disrupt the work of your department.

If your need for leave is not foreseeable, you must request it as soon as practicable.

Medical Certification

If you request a leave due to your own or a family member's serious health condition, you must provide medical certification from an appropriate health care provider. The medical certification must include the date on which the condition began and its probable duration. You may be denied leave if you do not provide satisfactory certification. MBI may also require a second opinion or third opinion as to a serious health condition, at our expense.

Outside Employment - You may not work for outside employers while on family and medical leave with MBI.

Returning to Work

If your leave is due to your own medical condition, you are required to provide medical certification that you are able to resume work before returning. Both you and your health care provider must complete a Return to Work Medical Certification.

Upon returning to work, you will be restored to your former position or to an equivalent position with the same employment benefits and

pay if possible. If you do not return to work at the end of the leave and do not notify MBI of your status, you may be terminated.

Benefits During Leave

Taking family and medical leave will not cause you to lose any employment benefits accrued prior to the first day of leave, and the leave period will be treated as continued service for purposes of determining vesting and eligibility to participate in any retirement plan in effect.

MBI will maintain your insurance benefits while you are on leave, although you may be required to pay your portion of the premium. However, if you do not return to work after the leave, you may be asked to reimburse us for maintaining insurance coverage during the leave.

Misrepresenting Reasons for Leave

If you intentionally misrepresent the reasons for requesting family and medical leave, you may be terminated.

4.12 | LEAVE OF ABSENCE

A leave of absence may be granted to an employee, at the discretion of the immediate Manager and Senior Management, when it is deemed that the leave is in the best interest of MBI or is mandated by law. If granted, a leave of absence does not guarantee an employee's job, except as indicated below.

A leave of absence may be granted to maintain continuity in instances where unusual or unavoidable circumstances may require an employee's absence. When an employee is absent for more than 5 consecutive working days without pay, their Manager will place them on a leave of absence effective the sixth day not worked. Leaves are granted on the assumption that the employee will be available to return to regular employment when the conditions necessitating the leave permit. In general, a leave of absence is considered a privilege. In no instances are leaves of absence granted automatically; leaves must be requested by the employee and approved as indicated below.

A leave of absence may be requested for a period of up to 12 weeks. A written request for a leave of absence must be submitted to the employee's Manager for approval.

Leave extensions beyond the maximum indicated in the Types of Leaves of Absences section below, will be considered as extensions of the initial leave, and require the same review and approval as above.

Types of Leave of Absences

- Family and medical leave.
- Military, Reserve or National Guard leave of absence.
- Leave of Absence without pay.

MBI may make provisions for a leave of absence without pay for an employee who needs unpaid time off for a valid reason, other than those covered by the reasons listed above. The maximum leave granted is 12 weeks.

Employees must be classified as regular part-time or regular full-time and have completed 6 months of continuous service as a regular employee before the effective date of leave.

Employees on unpaid leave of absence at the employee's request and/or a leave of absence requested by MBI, will not accrue vacation. MBI cannot guarantee reinstatement to the former position or to a position with like status or pay.

Leave of absence without pay for reasons other than civic duties such as court appearances, military duty, reserve duty or work-related injury or illness are granted on an individual basis at the sole discretion of MBI, but always taking into consideration the purpose of the leave, the employee's length of service and the needs of MBI at that particular time. A leave of absence without pay may be applied for upon the expiration of a leave approved under the Family and Medical Leave policy.



MBI'S SAFETY COMMITMENT AND INVOLVEMENT POLICY STATEMENT

The Management of MBI is committed to providing employees with a safe and healthful workplace. It is the policy of MBI that employees report unsafe conditions and do not perform work tasks if the work is considered unsafe. Employees must report all accidents, injuries and unsafe conditions to their Managers. No such report will result in retaliation, penalty or other disincentive.

Employee recommendations to improve safety and health conditions will be given thorough consideration by our Management Team. Management will give top priority to, and provide the financial resources for the correction of unsafe conditions. Similarly, Management will take disciplinary action against an employee who willfully or repeatedly violates workplace safety rules. This action may include verbal or written reprimands, and may ultimately result in termination of employment.

The primary responsibility for the coordination, implementation and maintenance of our workplace safety program has been assigned to the Safety Coordinator (386-736-9998).

Senior Management will be actively involved with employees in establishing and maintaining an effective safety program. Our Safety Coordinator, and or other members of our Management Team, will participate with you in ongoing safety and health program activities, which include:

- Promoting Safety Committee participation;
- Providing safety and health education and training; and
- Reviewing and updating workplace safety rules.

This policy statement serves to express Management's commitment to and involvement in providing our employees a safe and healthful workplace. This workplace safety program will be incorporated as the standard of practice for MBI. Compliance with the safety rules will be required of all employees as a condition of employment.



SAFETY FIRST

- ✓ The Management of MBI is committed to providing employees with a safe and healthful workplace.
- ✓ The primary responsibility for the coordination, implementation and maintenance of our workplace safety program has been assigned to Safety Coordinator (386-736-9998).

5.1 | EMERGENCY ACTION PLAN

Most of us do not like to think about emergencies, but we know that the best preparation is thorough planning. By learning MBI's emergency duties, we take the fear out of emergencies by knowing how to react. If an emergency occurs, heroes are NOT wanted — people who follow procedures ARE!

Emergency Communication Methods

If our facility needs to be evacuated for an emergency, you will be notified by these means:

- Our facility alarm system;
- Word of mouth; and
- The paging system.

5.1A | EMERGENCY EVACUATION ACTION PLAN

In the event of a FIRE, CHEMICAL SPILL, or BOMB THREAT, an Emergency Evacuation will be activated and the procedures described below are to be followed.

Emergency Warning

1. Receptionist is to announce an Emergency Evacuation of the building via the intercom and call 911.
2. In the event the power is out and the intercom is not available, employees should be informed verbally, in a calm manner, to evacuate while taking the fastest evacuation route possible. Area Managers, without taking an obvious risk to their personal safety, should warn employees in their area to evacuate.

Emergency Evacuation Procedures

1. Staying calm, without rushing or panicking, safely stop your work. If you are safely able to, gather your personal belongings especially any medications you might need. It might be hours before you are allowed back in the building.
2. Proceed to the nearest exit. While taking the fastest route to evacuate and without taking an obvious risk to personal safety.

3. Once outside, assembly at the designated Emergency Assembly Area and report to your Manager.

Emergency Assembly Area (EAA) *(see page 26 for map)*

- It is extremely important that each employee go to the designated EAA after exiting the building and remain together with his or her department.
- Each Department Manager is to confirm that all department employees have reached the designated EAA.
- In the event that an employee has not checked in at the EAA, NO ONE is to attempt to re-enter the building. The Manager should alert emergency responders ASAP of the missing employee.
- ONLY the Safety Coordinator has the authority to give the "All Clear" so employees may re-enter the building. Even if an Emergency Responder says it is clear, employees need to wait to hear the "All Clear" from the Safety Coordinator who will be in contact with the Emergency Responder in charge.



5.1B | FIRE EMERGENCY ACTIONS

What to Do in Case of a Fire

1. Alert others at risk.
2. Notify a member of Management.
3. Initiate the Emergency Evacuation Action Plan.
4. Turn off involved equipment (if safe to do so).
5. Consider using a fire extinguisher, BUT ONLY IF YOU ARE TRAINED AND AUTHORIZED.
6. Evacuate. *(See Emergency Assembly Area on page 26)*

What to Do If Alerted to a Fire

1. Turn off equipment (if safe to do so).
2. Walk in an orderly and quiet manner to the exit closest to you, not blocked by fire, smoke or other hazards, and exit the building.
3. Do not delay evacuation or re-enter hazardous areas to retrieve personal possessions such as keys, coats, purses or lunches.

4. Report to designated fire evacuation location for head count.
5. Stay together with your assigned group until further instructions are given.
6. Do not re-enter until advised that it is safe to do so by the Safety Coordinator.



5.1C | MEDICAL EMERGENCY

What to Do in a Medical Emergency

1. Notify a member of Management.
2. Evaluate scene safety; if there is any concern, all personnel should stay at a safe distance.
3. Do not move the ill/injured person (unless they are endangered by the surroundings).
4. Avoid all contact with blood and other bodily fluids (never attempt to provide first aid unless you are trained and equipped to do so).
5. A calm employee may stay with the ill/injured person to provide comfort.
6. The Manager or Safety Coordinator will assign at least 2 employees to wait for the EMS responders at the street entrance and guide the responders to the scene of the emergency.
7. All uninvolved personnel should clear the area.
8. If there has been any blood or bodily fluid release, trained personnel will clean and sanitize the area after the emergency phase has concluded.



5.1D | SEVERE WEATHER ACTION PLAN

In the event of severe weather or a tornado warning an Severe Weather Action Plan will be activated and the procedures described are to be followed.

1. The Safety Coordinator or a Safety Committee member, in the absence of the Safety Coordinator, has the authority to initiate the Severe Weather Action Plan.
2. Receptionist is to announce, by the intercom, that severe weather is approaching or a tornado warning has been issued for our area.
 - In the event of a power outage and the intercom is not available, employees should be informed verbally, in a calm manner, of the approaching weather.
3. All departments, vendors, and visitors need to report to the Creative Services Department, Variable Print Department, or Prepress Room to wait out the weather. *(See Severe Weather Designated Location on page 27.)*
 - While taking the fastest route to the Creative Services Department, Variable Print Department, or Prepress Room and without taking an obvious risk to personal safety, the Safety Coordinator should check any bathrooms, closets, or rooms for anyone who may not have heard the warning.
 - Once at the Creative Services Department, Variable Print Department or Prepress Room, if time permits as severe weather can appear almost with little or no warning, employees should report to their Manager.
 - It is the Manager's responsibility to confirm all employees are accounted for.
 - In the event an employee is missing, without taking an obvious risk to their personal safety, a Safety Committee member should try to locate the employee.

Protective Measures During the Storm

- Do NOT use telephone lines except for emergencies, as lightning can travel through phone lines.
- Do NOT use electrical equipment!
- Avoid contact with metal.
- If possible, get under a desk and/or cover yourself with anything that can protect you from flying debris including using your arms to protect your head and neck.

- ONLY the Safety Committee member who initiated the action plan has the authority to give the “All Clear.” NO ONE is allowed to leave the Creative Services Department, Variable Print Department, or Prepress Room until the “All Clear” is given.

After the Storm – Do Not Be Deceived

- Lightning can still strike long after it is last heard. Good rule of thumb is to wait 30 minutes after the last clap of thunder before exiting the building.
- Tornadoes generally occur near the trailing edge of a thunderstorm with clear, sunlit skies behind it. Because of this, before a tornado hits, the wind may die down and the air become very still. Good rule of thumb is to wait 30 minutes after the wind has died down before exiting the building.
- 50% of tornado-related injuries occur AFTER the storm during rescue attempts, cleanup, and other post-tornado activities. Take precautions if there is debris from a storm lying around. Be aware of broken glass, exposed nails, downed power lines and other potential hazards.

Hazardous Weather Conditions

We realize that bad weather or hazardous commuting conditions may occasionally make it impossible for employees to report to work on time.

However, you are expected to make a diligent effort to report to work when conditions have improved. If you determine that you are unable to report to work because of the conditions, inform your Manager as soon as possible.

If it becomes necessary to shut down the office due to weather or other emergency, every effort will be made to notify employees. If there is a question as to whether the office will be open, call the office at 386-736-9998. If there is no answer within one hour after the normal start time, assume the office is closed.



5.1E | HAZARDOUS CHEMICAL SPILL

In the Event of a Hazardous Chemical Spill or Release

1. Alert others in the area who are at risk and notify a member of Management who will call 911.
2. Turn off equipment (if safe to do so).
3. Walk in an orderly and quiet manner to the exit closest to you, that is not blocked by the chemical release.
4. Report to designated Emergency Assembly Area for head count. *(See page 26 for map.)*
5. The Safety Coordinator, or another member of Management, will observe the wind direction, if applicable, and determine the best shelter area for evacuated personnel.
6. Stay together with your assigned group until further instructions are given.
7. Do not re-enter until advised that it is safe to do so by your Manager or the safety coordinator.



5.1F | ELECTRICAL FAILURE

In the Event of Electrical Failure

1. If the failure affects only a part of the facility, notify your Manager.
2. Turn off equipment using normal controls (if safe to do so).
3. Expect sudden equipment restart; stay away from the point of operation and from other moving surfaces.
4. Do not attempt to move around dark areas.
5. After power is restored, follow Manager’s directions for equipment restart.

Fire Evacuation Plan / Emergency Assembly Area (EAA)





5.1G | WORKPLACE VIOLENCE

In the Event of Workplace Violence

1. If you witness a violent act, a threat of violence, or believe that a violent act may be possible, notify a member of Management immediately.
2. If you are in the area with a violent or threatening person, GET AWAY, AND IF POSSIBLE, NOTIFY OTHERS AT RISK.
3. If you are advised by a member of Management that a workplace violence incident may be occurring, follow all directions immediately.

CONCLUSION

- Remember the methods used to alert you of an emergency in the facility.
- **If you discover an emergency you must always:**
 - Alert others who are in immediate danger; and
 - Notify a member of Management.
- Remember your evacuation locations for fire/chemical spill or release and for severe weather.
- React quickly and calmly in the event of any emergency.

For more information regarding Emergency Action Plans or other safety issues, please contact the Safety Coordinator: 386-736-9998.

5.2 | SAFETY COMMITTEE

A Safety Committee has been established as a management tool to recommend improvements to MBI's workplace safety program and to identify corrective measures needed to eliminate or control recognized safety and health hazards. The Safety Committee employer representatives will not exceed the amount of employee representatives.

Responsibilities

The Safety Committee will be responsible for communicating procedures for evaluating the effectiveness of control measures used to protect employees from safety and health hazards in the workplace.

The Safety Committee will be responsible for reviewing and updating workplace safety rules based on accident investigation findings, any inspection findings, and employee reports of unsafe conditions or work practices; and accepting and addressing anonymous complaints and suggestions from employees.

The Safety Committee will be responsible for updating the workplace safety program by evaluating employee injury and accident records, identifying trends and patterns, and formulating corrective measures to prevent recurrence.

The Safety Committee will be responsible for evaluating employee accident and illness prevention programs, and promoting safety and health awareness and co-worker participation through continuous improvements to the workplace safety program.

Safety Committee members will participate in safety training and be responsible for monitoring workplace safety education and training to ensure that it is in place, that it is effective, and that it is documented.

Meetings

Safety Committee meetings are held quarterly and more often if needed, and each committee member will be compensated at his or her hourly wage when engaged in Safety Committee activities.

The Safety Coordinator will post the minutes of each meeting on the electric bulletin board. All Safety Committee records will be maintained for not less than 3 calendar years.

5.3 | FIRST AID PROCEDURES

Minor First Aid Treatment

First aid kits are stored throughout the building. If you sustain an injury or are involved in an accident requiring minor first aid treatment:

1. Inform your Manager.
2. Administer first aid treatment to the injury or wound.
3. If a first aid kit is used, indicate usage on the accident investigation report.
4. Access to a first aid kit is not intended to be a substitute for medical attention.
5. Provide details for the completion of the accident investigation report.

Non-Emergency Medical Treatment

For non-emergency work-related injuries requiring professional medical assistance, the Safety Coordinator or Management must first authorize treatment. If you sustain an injury requiring treatment other than first aid:

1. Inform your Manager.
2. Proceed to the AdventHealth Centra Care, 92293 S. Woodland Ave., DeLand, FL 32720. Your Manager or the Safety Coordinator will assist with transportation, if necessary.
3. Provide details for the completion of the accident investigation report.

Emergency Medical Treatment

If you sustain a severe injury requiring emergency treatment:

1. Call for help and seek assistance from a co-worker.
2. Call 911 (dial 9 first).
3. Provide details for the completion of the accident investigation report.

5.4 | GENERAL SAFETY RULES

Several general plant safety rules follow. New or changed rules may be added to these.

- Employees are not permitted to go to work or be on the job if under the influence of liquor, any alcoholic beverage or drugs (except drugs prescribed by a licensed doctor).
- Horseplay such as wrestling, throwing of materials, racing or riding on powered or hand trucks is prohibited.
- Use tools and equipment in good condition, never use mushroom headed tools, broken ladders, etc.
- While in contact with production material or machinery, employees must not wear loose fitting clothing, sandals, clogs or any open toe shoe. Hair that touches your collar must be tied back and covered with a hair net or covered with a hair net and placed under a ball cap while operating machinery. Loose jewelry must be removed or worn so as to not interfere with the safe operating of machinery.

FIRST AID DIRECTORY	
Safety Coordinator	Jim Humphrey Ext. 202
First Aid.....	Rani Bloodworth Amberleigh Sauer Kyle Thomas
Poison Control	DIAL (9) 911 (9) 1-800-282-3171
Ambulance.....	DIAL (9) 911
Advent Health Centra Care.....	(9) 386-279-7010 92293 S. Woodland Ave. DeLand, FL 32720
Fire Department.....	DIAL (9) 911
Police	DIAL (9) 911

- Guards on or around machinery and electrical equipment may not be removed except to make repairs, or to service machinery, and must be replaced immediately after this work is done.
- Wastepaper and any debris are not to accumulate or be left lying around on floors in your work area.
- Aisles, exits and areas in which fire and safety equipment are located, must be kept clear at all times.
- Smoking of tobacco products or any other products, including smokeless or electronic cigarettes, is prohibited anywhere inside the entire building. Smoking is allowed outside in the designated smoking areas and only during break and lunch time. Butts are to be extinguished and disposed of in the proper receptacle.
- All accidents and unsafe conditions are to be promptly reported to your Manager. Managers are expected to take prompt action on correcting unsafe conditions and, in instances of imminent danger, are authorized to suspend operations in order to correct safety hazards and protect the safety of employees.
- At no time is anyone, other than the licensed operator, permitted to ride on a powered lift truck.
- Employees injured on the job will be returned to work as soon as we have a written release from a qualified medical practitioner outlining any restrictions.

5.5 | HAZARD COMMUNICATION STANDARDS (HCS)

Designed to ensure that the hazards of all chemicals produced or imported are identified, classified, and that information concerning their hazards are transmitted to employers and employees accomplished through:

- Written Program
- Chemical Inventory
- Container Labeling
- Safety Data Sheets (SDS)
- Employee Training



5.5A | WHO IS COVERED AND WHAT ARE THEIR RESPONSIBILITIES UNDER THE ACT?

- Manufacturers, Distributors, Importers
 - Determine hazard classification.
 - Develop SDS information.
 - Prepare and provide shipped container labeling.
- Employers
 - Develop written program.
 - Maintain SDS.
 - Ensure appropriate and correct container labeling.
 - Train employees.
- Employees
 - Recognize and understand hazards based on SDSs, container labels, and employer-provided training.
 - Follow required procedures as stated in the rule and in Company's program.

Covered Employees

The standard applies to general industry, including printing operations, where employees are exposed or potentially exposed to chemical hazards. Covered employees include:

- Production personnel, shipping/receiving, maintenance, customer service representatives, office personnel, etc.

Employee Training

Employees must receive hazard communication training:

- Before a new employee begins working;
- When new hazards (e.g., chemicals) are introduced; and
- When transferred to a new job with hazards not previously covered.

5.5B | TOPICS COVERED IN THIS HCS EMPLOYEE TRAINING MANUAL

- **Summary** of HCS requirements.
- **Location and availability** of written program, chemical inventory, and SDS.
- **How to read the SDS.**
- **Specific information** related to chemicals in the facility.
 - Physical Hazards
 - Health Hazards
 - Hazards not otherwise classified
- **Specific procedures** to follow to protect employees from the chemical hazard.
- **Methods used** to detect the presence or release of hazardous chemicals.
 - Sensor alarms, odors, and visual other monitoring devices
- **Specific procedures** to follow in the event of spills, releases, or other emergencies.
- **Container labeling**
 - Including secondary container labeling system

Core Requirements Under HCS

- Written Hazard Communication Program
- Chemical Inventory
- Safety Data Sheets
- Container Labeling
- Employee Training

Written Program

- A written plan for employers on how they will implement the HCS.
- Describes how the standard will be implemented.
- Includes any supplemental policies regarding HCS.
- Provides employees with full HCS program information.

Chemical Inventory

- A listing of all hazardous chemicals or products containing hazardous chemicals used or present at the facility.
- Updated for each new chemical or product.
- Used in conjunction with SDSs.
- Accessible to all employees.

Safety Data Sheets (SDS)

- Safety Data Sheets. Commonly called an SDS.
- Previously called Material Safety Data Sheets (MSDS).
- Product information sheets supplied by the manufacturer to provide information on the hazards, safe use and handling, and precautions of the chemical.
- Required for each hazardous chemical or product in inventory
- Employers must ensure that SDS are readily accessible to all employees.
- Written in a specified 16-section format
- Section titles consistent for all manufacturers, importers, and suppliers.
- Should improve comprehensibility and accuracy of information.

SDS Sections

Section 1 – Identification

- Identifies the chemical on the SDS as well as the recommended uses.
- Provides the essential contact information of the supplier.

Section 2 – Hazard(s) identification

- Hazards of the chemical(s) on the SDS.
- Appropriate warning information associated with those hazards.
- Hazards not otherwise classified.
 - An identified hazard not under a specified criteria.
 - Example: Combustible Dust
 - This type of hazard may not be on the label.
 - Still required for employee training.

Section 3 – Composition/Information on Ingredients

Identifies the ingredient(s) contained in the product indicated on the SDS, including:

- Impurities and stabilizing additives.
- Information on substances, mixtures, and all chemicals where a trade secret is claimed.

Section 4 – First Aid Measures

Describes the initial care that should be given by untrained responders to an individual who has been exposed to the chemical.

Section 5 – Fire Fighting Measures

Provides recommendations for fighting a fire caused by the chemical such as extinguishing equipment and hazardous combustion products.

Section 6 – Accidental Release Measures

Provides recommendations:

- Appropriate response to spills, leaks, or releases, (e.g. containment and cleanup practices)
- Response for large vs. small spills, if different

Section 7 – Handling and Storage

Provides guidance on the safe handling practices and conditions for safe storage of chemicals.

Section 8 – Exposure Controls/Personal Protection

Indicates the exposure limits, engineering controls, and personal protective measures that can be used to minimize worker exposure.

Section 9 – Physical and Chemical Properties

Identifies physical and chemical properties associated with the substance or mixture such as appearance, odor, pH, flashpoint, vapor pressure, etc.

Section 10 – Stability and Reactivity

Describes the reactivity hazards of the chemical and the chemical stability information.

Section 11 – Toxicological Information

Identifies toxicological and health effects information or indicates the is data unavailable.

Section 12 – Ecological Information*

Section 13 – Disposal Consideration*

Section 14 – Transport Information*

Section 15 – Regulatory Information*

Section 16 – Other information including date of preparation of last revision

**These sections are outside of OSHA's jurisdiction but are included as part of a GHS-compliant SDS.*

5.5C | CONTAINER LABELING

Chemical container labels provide information on:

- Product identity
- Hazards and safe use
- Proper storage

All hazardous chemical containers present and used at the worksite must be labeled and it must be legible.

- Including tanks, totes, drums, barrels, bags, boxes, cans, etc.

One Exemption from Labeling

Immediate Use Container. A container label is not required for portable containers if the chemical container remains under the constant control of the person who fills it and the contents are completely used by the end of the shift.

However, if the container has leftover content, or is stored away and otherwise out of the control of the person who filled it, it must be labeled.

Required Label Elements

- | | |
|----------------------|---|
| 1. Label Pictograms | 4. Precautionary Statements |
| 2. Signal Words | 5. Product Identification |
| 3. Hazard Statements | 6. Supplier/Manufacturer Identification |

Label Pictograms

- 9 Total Pictograms *(for more details see page 34)*
 - Red border set at a point (diamond)
 - No empty borders allowed
 - Black hazard symbol on white background
- 8 pictograms regulated by OSHA *(for more details see page 34)*
 - Health Hazard Pictograms



Health Hazard



Exclamation Mark



Corrosion



Skull & Crossbones

- Physical Hazard Pictograms



Health Hazard



Exclamation Mark



Corrosion



Skull & Crossbones

- 1 pictogram is optional *(for more details see page 34)*
 - Environmental Hazards regulated by EPA



Environment

Signal Words






Words used to indicate the severity of the hazard and alert employees to the potential hazard.






- Only 2 signal words are available:
 - **DANGER** (more severe hazard)
 - **WARNING** (less severe hazard)
- Only one signal word is used no matter how many hazards
 - Defers to more serious when multiple hazards.
- Not all labels will have a signal word.
 - Some chemicals are not hazardous enough to require that a signal word appear on the label.

Hazard Statement

- There are specific hazard statements that must appear on the label based on the chemical hazard classification and degree of hazard.
- Describes the nature of the hazard(s) and degree.
 - Example: Causes damage to kidneys through prolonged or repeated exposure when absorbed through the skin.
- Other examples
 - "Flammable liquid and vapor"
 - "Causes skin irritation"
 - "May cause cancer"

Container Labeling: Label Pictograms

HEALTH HAZARDS				ENVIRONMENTAL HAZARDS
 <p>HEALTH HAZARD <i>Regulated by OSHA</i></p> <ul style="list-style-type: none"> • Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity 	 <p>EXCLAMATION MARK <i>Regulated by OSHA</i></p> <ul style="list-style-type: none"> • Irritant (Skin & Eye) • Skin Sensitizer • Acute Toxicity • Narcotic Effects • Respiratory Tract Irritant • Hazardous to Ozone Layer (Non-Mandatory) 	 <p>CORROSION <i>Regulated by OSHA</i></p> <ul style="list-style-type: none"> • Skin Corrosion • Eye Damage • Corrosive to Metals 	 <p>SKULL & CROSSBONES <i>Regulated by OSHA</i></p> <ul style="list-style-type: none"> • Acute Toxicity (Fatal or Toxic) 	 <p>ENVIRONMENT <i>Regulated by EPA</i></p> <ul style="list-style-type: none"> • Aquatic Toxicity

PHYSICAL HAZARDS				
 <p>FLAME <i>Regulated by OSHA</i></p> <ul style="list-style-type: none"> • Flammables • Pyrophonics • Self-Heating • Emits Flammable Gas • Self-Reactives • Organic Peroxides 	 <p>GAS CYLINDER <i>Regulated by OSHA</i></p> <ul style="list-style-type: none"> • Gases Under Pressure 	 <p>CORROSION</p> <ul style="list-style-type: none"> • Skin Corrosion • Eye Damage • Corrosive to Metals 	 <p>EXPLODING BOMB <i>Regulated by OSHA</i></p> <ul style="list-style-type: none"> • Explosives • Self-Reactive • Organic Peroxides 	 <p>FLAME OVER CIRCLE <i>Regulated by OSHA</i></p> <ul style="list-style-type: none"> • Oxidizers

Precautionary Statement

- Recommended measures to minimize or prevent adverse effects related to:
 - Exposure
 - Response
 - Improper storage or handling
 - Disposal
- Examples
 - “Wear respiratory protection”
 - “Wash with soap and water”
 - “Store in a well ventilated place”
- Precautionary information is not yet standardized or mandatory as not all exposures are the same based on specific workplace circumstances.

Product and Manufacturer Identification

- Product identification (i.e., name of product)
- Supplier identification
 - Address
 - Telephone number

Container Labels: Other Information

Other information that may be included on the label:

- Physical state
- Color
- Hazards not otherwise classified
- Route of exposure
- Storage and disposal
- Hazard prevention and emergency response instructions

In-House Label Systems

Used when:

- Transferring chemicals to other containers. Also called “Secondary Container” Labeling.
- Replacing labels that are missing
- Labels become illegible

Secondary Container Labels

OSHA allows employers to use alternative methods for labels in-house.

- Must be consistent with the revised HCS.
- Cannot have conflicting hazard warnings or pictograms.
- Employer can use duplicate manufacturer labels.
- Provided along with other information and methods, makes all of the required information immediately available to employees using the chemical, and provides all of the specific information as required and described by the HCS.
- Two common in-house label types used.
- Can still be used, but must be combined with the other additional information required by the HCS as previously mentioned.

HMIS Label

HEALTH	1
FIRE	0
PHYSICAL	0

NFPA Label



CHEMICAL HAZARDS

Physical Hazards Include:

- Explosives
- Combustible Dust
- Flammable Aerosols
- Oxidizing Gases
- Gases under Pressure
 - Compressed Gases
 - Liquefied Gases
 - Refrigerated Liquefied Gases
 - Dissolved Gases

Health Hazards Include:

- Acute Toxicity
- Skin Corrosion/Irritation
- Respiratory or Skin Sensitization
- Germ Cell Mutagenicity
- Carcinogenicity
- Reproductive Toxicity

Chemical Exposure

- Dosage
 - Defined as the exposure of an amount or concentration of a chemical over a specific time period.
 - Expressed as Permissible Exposure Limits (PEL) or Threshold Limit Values (TLV).
- Acute Effects
 - Health hazards occurring rapidly following brief exposure.
 - Rashes, burns, respiratory irritation, and poisoning.
- Chronic Effects
 - Health hazards causing long-term effects following prolonged exposure.
 - Allergies, lung or liver damage, cancer.

Routes of Exposure

- Inhalation
 - Inhaling airborne materials.
- Skin Absorption
 - Contact with a substance through the skin.
- Ingestion
 - Swallowing chemicals/materials.
- Injection
 - Associated with blood-borne pathogens.
- Ocular
 - Absorbed through the eyes.

Summary

OSHA's HCS is based on a simple concept — that employees have both a need and a right to know the hazards and identities of the chemicals they are exposed to when working. Employees also need to know what protective measures are available to prevent adverse effects from occurring.

5.6 | ALCOHOL AND DRUG-FREE WORKPLACE PROGRAM

MBI is committed to a safe and healthy workplace, because we recognize that drug and alcohol abuse and use in the workplace increases the risk of accidents to all employees and can lead to decreased productivity, high turnover, and decreased morale. It is our goal to establish and clearly communicate a drug and alcohol program that will help us to maintain a safe and healthy workplace, in the hopes that all employees will be free of any chemical impairment.

While MBI understands that employees and applicants under a physician's care are required to use various prescription drugs, abuse of prescribed medications will be dealt with in the same manner as the abuse of illegal substances.

The ultimate goal of this policy is to balance our respect for individual privacy with our need to keep a safe, productive, drug-free environment. Our intention is to prevent and treat substance abuse. We would like to encourage those who use drugs or abuse alcohol to seek help in overcoming their problem. In this way, fully rehabilitated abusers who remain drug free can return to work as employees in good standing.

With these basic objectives in mind, the Company has established the following policy with regard to use, possession, or sale of alcohol and drugs (pursuant to requirements under Florida Statute 440.102 and Administrative Rule 38F-9 of the Department of Labor and Employment Security, Division of Workers' Compensation).

Definitions

- A. "Legal Drug" Prescribed drug or over-the-counter drug which has been legally obtained and is being used solely for the purpose for which it was prescribed.
- B. "Illegal Drug" Any drug:
 - Which is not legally obtainable;
 - Which may be legally obtainable but has not been legally obtained; and

- Which is being used in a manner or for a purpose other than as prescribed.

Policy and Work Rule

The Company's policy is to employ a work force free from use of illegal drugs and abuse of alcohol, either on or off the job. Any employee determined to be in violation of this policy may be terminated as provided herein.

It is a standard of conduct of employees of the Company that employees shall not use illegal drugs or abuse alcohol. In order to maintain this standard, the Company has established and will maintain the policy set forth below.

A. Visible Impairment

An employee reporting for work visibly impaired or who becomes visibly impaired while at work cannot properly perform required duties and will not be allowed to continue work.

If possible, the employee's Manager should first seek another Manager's opinion to confirm the employee's status. Then the Manager should consult privately with the employee to determine the cause of the observation, including whether substance abuse has occurred.

If, in the opinion of the Manager, the employee is considered impaired in violation of this policy, the employee will be required to submit to testing as outlined in Sections C-1 and K. The employee should be sent home or to a medical facility by taxi or other safe transportation alternative, depending on the determination of the observed impairment, accompanied by the Manager or another employee if necessary. An employee under suspicion of impairment will not be allowed to drive.

B. Pre-Employment Drug-Abuse Screening

The Company will conduct pre-employment screening examinations designed to prevent hiring individuals who use illegal drugs or individuals whose use of legal drugs or alcohol indicates a potential for impaired or unsafe job performance. *(See Section J for further detail.)*

C. Current Employee Drug and Alcohol Abuse Screening

The Company will maintain screening practices to identify employees who use illegal drugs or abuse alcohol, either on or off the job. It shall be a condition of continued employment for all employees to submit to a drug screen.

1. When there is reasonable suspicion to believe that an employee is using or has used illegal drugs or is abusing or has abused alcohol. *(See Section K for further detail.)*
2. When the employee is involved in any mishap or accident in which injury to persons or damage to property has occurred.
3. Following the employee's completion of an Employee Assistance Program (EAP) for drug related problems or an alcohol and drug rehabilitation program. The Company will require such an employee to submit to a drug test as a follow-up to such a program, and then again on a monthly, quarterly, semi-annual, or an annual basis for 2 years thereafter. *(See Section D for further information about EAPs.)*
4. When the test is conducted as part of a routinely scheduled employee fitness-for-duty medical examination.
5. As part of random testing by the Company, which will be conducted. *(See Section L for details about random testing.)*

Any employee who has been involved in a mishap or accident in which injury to persons or damage to property has occurred is subject to immediate termination if the employee is found to be impaired as a result of drugs or alcohol.

D. Employee Assistance Program

The Company maintains a referral list for an Employee Assistance Program (EAP) which provides help to employees and their families who suffer from alcohol or drug abuse *(See Section O)*. Employees are encouraged to seek assistance from an EAP before alcohol and drug problems lead to formal disciplinary actions.

An employee's decision to voluntarily seek prior assistance from an EAP will not be used as the basis for disciplinary action and will not

be used against the employee in any disciplinary proceeding. On the other hand, participating in an EAP will not prevent disciplinary action if there are violation(s) of any other Company policy or if the employee has previously violated this policy.

An EAP will provide appropriate assessment, evaluation and counseling and/or referral and treatment of drug and alcohol abuse. Such employees may be granted leave without pay with a conditional return to work, depending on successful completion of the agreed-upon appropriate treatment regimen, which shall include random testing. The employee has 7 days to seek treatment and disclose program details to MBI.

The cost of an EAP will be the responsibility of the employee and is subject to provisions of the Company's health insurance plan, if applicable.

E. General Policy

Illegal Drug Possession/Use/Abuse

- An employee bringing onto the Company's premises or property;
- Having possession of;
- Being under the influence of;
- Possessing in the employee's body, blood or urine in an amount that exceeds the levels established by the Department of Health and Human Services; and
- Using, consuming, transferring, selling or attempting to sell or transfer any form of illegal drug, while on Company business or at any time during the hours between the beginning and ending of the employee's workday, whether on Company property or not, violates this policy.

Alcohol Abuse

An employee who is under the influence of alcoholic beverages at any time while on Company business or at any time during the hours between the beginning and ending of the employee's workday, whether on Company property or not, violates this policy.

An employee shall be determined to be under the influence of alcohol if:

- The employee's normal faculties are impaired due to consumption of alcohol.
- The employee has a blood-alcohol level of .04 or higher.
- The employee has a urine-alcohol level of 250 ng/mL or higher.

F. Confidentiality

1. All information, interviews, reports, statements, memoranda, and drug test results, written or otherwise, received by the employer through a alcohol and drug free workplace program will be maintained as confidential by the Company, except in the following circumstances:
 - When the employee has given consent to make the test results known;
 - When the test results are placed at issue by the employee in any legal, administrative, or other proceeding to determine comprehensibility of a workers' compensation claim or as otherwise provided by law; or
 - Entry of a court order requiring disclosure or release.
2. Employers, laboratories, EPAs, drug and alcohol rehabilitation programs, and their agent(s) who receive or have access to information concerning drug test results shall keep all information confidential. Release of such information under any other circumstances shall be solely pursuant to a written consent form signed voluntarily by the person tested, unless such release is compelled by a hearing officer or a court of competent jurisdiction, or unless deemed appropriate by a professional or occupational licensing board in a related disciplinary proceeding. The consent form must contain, at a minimum, the following:
 - The name of the person who is authorized to obtain the information;
 - The purpose of the disclosure;
 - The precise information to be disclosed;
 - The duration of the consent; and
 - The signature of the person authorizing release of the information.

3. Nothing herein shall be construed to prohibit the employer, agent of the employer, or third party testing Company conducting a drug test from having access to employee drug-test information when consulting with legal counsel in connection with actions brought under or related to this section or when the information is relevant to its defense in a civil or administrative matter.

G. Challenges to Test Results

1. A requirement of a drug-free workplace program is that within 5 working days after receiving notice of a positive confirmed test result, the employee must be allowed to submit information to an employer explaining or contesting the test results. If an employee's explanation or challenge of the positive test result is unsatisfactory, the employer shall provide the employee with a written explanation along with the report of positive test results within 15 days of receipt of the employee's explanation or challenge.
2. An employee or job applicant may undertake an administrative challenge by filing a claim for benefits with a Judge of Compensation Claims pursuant to Chapter 440, Florida Statutes, or, if no workplace injury has occurred, the person may challenge the test result in a court of competent jurisdiction. When an employee undertakes a challenge to the result of a test, it shall be the employee's responsibility to notify the laboratory, so that the sample may be retained by the laboratory until the case is finalized.

H. Drugs to Test For

The Company may test for any or all of the following substances:

- **Alcohol**
 - Liquor, Beer, Booze
- **Amphetamine**
 - Uppers, Speed, Benny, Dexy, Louee, Goey, Whizz, Pep Pills, Sulph, Billy, Phets
- **Barbiturates**
 - Barbs, Barbies, Sleepers, Blue Bullets, Blues, Tylenol with Codeine.
- **Benzodiazepine**

- Benzos, Alprazolam, Benzodiazepam, Bromazepam, Chlordiazepoxide, Librium, Valium, Halcion, Restoril

- **Cannabinoids**

- Marijuana, Pot, Weed, Grass, Smoke, Dope, Ganja, Reefer, Mary Jane, Aunt

- **Cocaine**

- Coke, Dust, Toot, Snow, Blow, Bumps, Lines, Nose Candy, Snowball, Flake, Crack

- **Opiates**

- Aunti, Aunt Emma, Big O, Black Hash, Black Russian, Black Pill, Black Stuff, Black Tar, Buddha, China White, Chinese Molasses, Paregork, Morphine

- **Methamphetamine**

- Tina, Christina, Tweak, Speed, Glass, Quartz, Uppers

- **Methylenedioxymthamphetamine**

- MDMA, X, E, Eve, Adam, XTC, Roll, Triple Stacks, Decadence, Molly, Beans

- **Oxycodone**

- Oxy, Hillbilly Heroin, Oxycontin, OC, Killers

- **Phencyclidine**

- PCP, Angel Dust, Angel Hair, Angel Poke, Dust, Embalming Fluid, Fry, Flake Hog

- **Propoxyphene**

- Darvon, Darvocet, Footballs

- **Synthetic Narcotics**

- Methadone, Polophine, Methadose, Spice, K-2, Meth, MTD, Juice

Over-the-Counter and Prescription Drugs Which Could Alter or Affect Drug Test Results

There are possible influences that prescription drugs may have on the outcome of a drug test. It is for your information only at this time. If necessary, any questions about the outcome of a drug test will be addressed by a licensed physician.

Possible influences that prescription drugs may have on the outcome of a drug test:

- **Alcohol**

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

- **Amphetamines**

- Obetrol, Biphphetamine, Desoxyn, Dexedrine, Didrex, Ionamin, Fastin, Adderall, Vyvanse, etc.

- **Barbiturates**

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

- **Benzodiazepines**

- Ativan, Azene, Clonopin, Dalmine, Diazepam, Librium, Xanax, Serax, Tranxene, Valium, Verstran, Halcion, Paxipam, Restoril, Centrax

- **Cannabinoids**

- Marinol, CBD, THC (Dronabinol), CBN, CBG, CBC, and THCV

- **Cocaine**

- Cocaine HCl topical solution (Roxanne)

- **Methaqualone**

- Not legal by prescription

- **Methadone**

- Dolophine, Metadose

- **Opiates**

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

- **Phencyclidine**

- Not legal by prescription

- **Propoxyphene**

- Darvocet, Darvon, Darvon-N, Dolene

I. Consultation Rights

Employees and applicants have the right to consult the testing Company for technical information regarding prescription and nonprescription medications.

J. Pre-Employment Drug Testing Policy

All job applicants at this Company will undergo screening for the presence of illegal drugs or alcohol as a condition for employment.

Applicants will be required to voluntarily submit to an in-house saliva drug screening given by MBI and, by signing consent agreement, will release the Company from liability.

The Company will not discriminate against applicants for employment because of past abuse or drugs or alcohol. However, the Company will not tolerate any current drug or alcohol use or abuse that is in violation of this policy. If an applicant tests positive for a pre-employment drug test, they are not eligible for hire.

K. Active Employee Reasonable Suspicion Substance Abuse Testing Policy

Employees may be required to submit to drug and/or alcohol testing given by in-house by MBI if there is a cause for reasonable suspicion of substance abuse.

Whenever possible, the Manager should have the employee observed by a second Manager or Managers before requiring testing. Circumstances that may be considered reasonably suspicious are as follows:

- Observable phenomena while at work, such as direct observation of drug use or of the physical symptoms or manifestations of being under the influence of a drug;
- Abnormal conduct or erratic behavior while at work or a significant deterioration in work performance;
- A report of drug use provided by a reliable and credible source and independently corroborated;
- Evidence that an individual has tampered with a drug test during his employment with the current employer;
- Information that an employee has caused, or contributed to, an accident while at work; and
- Evidence that an employee has used, possessed, sold, solicited or transferred drugs while working or while on the employer's premises or while operating the employer's vehicle, machinery, or equipment.

Any confirmed positive test is a violation of this policy.

L. Random Drug Testing Policy

For random drug testing, all employees' names will be entered and randomly selected for testing by a third-party testing Company. MBI will not announce when random drug tests will be performed. No particular employee will be targeted for drug testing. Any confirmed positive test is a violation of this policy.

M. Consequences to Refusing a Drug Test or Treatment

Any job applicant who refuses to submit to drug and alcohol testing, or who alters, changes in any way, or otherwise interferes with drug testing collection, samples, or analysis, is immediately disqualified from employment by the Company.

Any employee who refuses to submit to drug and alcohol testing, or who alters, changes in any way, or otherwise interferes with drug testing collection, samples, or analysis, is subject to immediate termination from employment.

Any employee who rejects an EAP or who fails to complete an EAP or treatment program is subject to immediate termination from employment. This applies regardless of whether the Company referred the employee to the EAP or whether the employee voluntarily sought treatment.

If an employee is referred to an EAP for drug or alcohol treatment or voluntarily enrolls in a drug or alcohol treatment program more than once within a 3-year period, that employee will be subject to termination from employment.

N. Alcohol and Drug-Free Workplace Program Information

Company DFWP Program Administrator: Human Resources

Company Location:

MBI Direct Mail + Digital, Inc. 386-736-9998
710 West New Hampshire Ave., DeLand, FL 32720

Third-Party Collectors:

MRO: Dr. Seth Portnoy 800-881-4826
Total Compliance Network, 5646 W. Atlantic Blvd.. Margate, FL 33063

Collection Site:

AdventHealth Centra Care 386-279-7010
2293 S. Woodland Blvd., DeLand, FL 32720

O. Employee Assistance Program

The following organizations and resources provide free, confidential assistance to individuals who have, or know someone who has, a problem with alcohol or other drugs.

EAP Referral List

The following organizations and resources provide free, confidential assistance to individuals who have, or know someone who has, a problem with alcohol or other drugs.

Drug & Alcohol Abuse Hotline	1-800-662-4357
Drugfree.org	1-855-378-4373
Alcoholics Anonymous	1-866-210-1303
Narcotics Anonymous	1-844-344-3155
AL-ANON Family Group Headquarters	1-888-425-2666
Child Help's - National Child Abuse Hotline	1-800-422-4453
M.A.D.D.	1-877-623-3435
S.A.D.D.	1-888-608-6988
Families Anonymous	1-800-736-9805
Florida Alcohol and Drug Abuse Association	1-888-287-0471
National Runaway Switchboard	1-800-786-2929
National Institute on Drug Abuse (NIDA)	1-301-443-6441
National Suicide Prevention Lifeline	988
National Council on Alcoholism & Drug Dependence Hopeline	1-601-899-5880

Employees may also speak with MBI representatives identified in Section N for additional EAP information.

5.7 | SMOKE AND VAPE-FREE WORKPLACE

Designated Smoking Area Statement of Policy

In the interest of providing a safe and healthy environment for employees, customers, visitors and in the accordance with the Florida Clean Indoor Air Act, the following policy has been adopted.

As of December 31, 1995, smoking of tobacco products or any other products including smokeless or electronic cigarettes is prohibited throughout this facility except in designated smoking areas identified by “smoking permitted” signs.

Notice of Policy

The success of this policy depends upon the thoughtfulness, consideration and cooperation of smokers and nonsmokers. All employees share in the responsibility for adhering to and enforcing this policy.

Copies of this policy are to be distributed to all employees. Prominent signs displaying the following statement are posted at all building entrances:

Smoking is prohibited except in designated smoking areas, pursuant to the Florida Clean Indoor Air Act.

Designated “Smoking Permitted” Areas

The “Smoking Permitted” areas are marked with prominent signs. Smoking is permitted in these areas only.

Special Consideration

Managers will provide special consideration to employees who have identified themselves as having a hypersensitivity to tobacco smoke. Examples of action that may be taken are:

- Prohibit smoking in and around the hypersensitive person’s work area and in areas where this individual is expected to go.
- Relocate the work station of the hypersensitive individual to an area where there is no exposure to tobacco smoke.

Enforcement of Policy Complaints

Persons observing a violation of this policy should bring it to the attention of their Manager. The right of the nonsmoker to protect their health and comfort will prevail over an employee’s desire to smoke.

Investigations

Managers receiving a complaint will investigate and take action to resolve the issues as soon as possible.

The following should NOT be designated as smoking areas:

- Any area in which a fire or safety hazard exists;
- Any area where smoking is prohibited by the local fire marshal or other law;
- Confined areas of general access; and
- Stairwells, corridors, hallways, lobbies and entryways.

5.8 | BUILDING SECURITY

MBI is committed to ensuring employees’ security, therefore, our premises are equipped with video surveillance cameras. Each and every employee of MBI is responsible for the security of their individual work area as well as the security of MBI properties.

1. The normal business hours of MBI are Monday through Friday, 8:00 a.m. to 5:00 p.m. The production area may be in operation 24 hours, 7 days per week.
2. During normal business hours, all visitors, including vendors, friends, family or former employees, are to enter the facility through the main entrance (all other entrances are for employee-use only as posted). Visitors, who must sign in with the receptionist, will be issued a “Visitor” badge, and are to be accompanied by an MBI employee while in the building. For safety reasons children under 16 are prohibited from the production areas.
3. After business hours, no visitor can be left unattended, including vendors and trucking companies.
4. All MBI employees need to be concerned with building lock-up and ensure that when entering and leaving the building after normal business hours, all doors (including the overhead doors) are locked. Employees who have been issued building, office keys or codes are not to lend them to others.
5. All MBI employees are encouraged to report safety concerns, such as inadequate building lighting and door problems, to the safety committee.

5.9 | SEARCHES

To the extent permitted by law, MBI reserves the right, but no obligation, to inspect items carried to and from MBI property. As all offices, desks, files, equipment, etc. are the property of the MBI and are provided solely for use during one's employment, MBI reserves the right, but is not obligated, to search any employee's office, desk, files, equipment or any other area or article on our premises.

Employees who refuse to cooperate in an inspection, as well as employees who, after the inspection, are believed to be in possession of stolen property, weapons, or illegal substances, will be subject to disciplinary action, up to and including termination, if, upon investigation, they are found to be in violation of any company policy.

5.10 | DRIVING FOR THE COMPANY

All employees who drive on behalf of MBI must maintain a valid driver's license. Employees are required to report any restrictions to their licenses within 24 hours of the restriction if it prohibits the employee from performing their job requirements.

Employees must report all vehicle accidents and incidents that occur during working hours to their manager or Senior Management immediately, regardless of their severity. Employees are responsible for any moving and parking violations and fines that may result from operating a vehicle, whether personal or rental, for work purposes.

Employees driving on behalf of MBI are expected to drive carefully and defensively and obey all driving laws. While driving during working time, the use of seat belts is mandatory. Only company-authorized passengers are permitted.

Whenever an employee may be required to drive on any company errand or business, the consumption of alcohol, marijuana, or

other impairing substances is prohibited. It is solely the employee's responsibility to avoid such situations.

Vehicles used for company business must be kept in good working condition. Preventive maintenance, as outlined in the vehicle's owner's manual, should be performed by a certified service provider. Vehicles may not be operated with any defect that would inhibit safe operation during current and foreseeable weather conditions.

Employees who drive personal vehicles as part of their employment must maintain sufficient insurance coverage on their vehicle. Proof of current insurance must be provided upon demand at any time. MBI will reimburse employees for work-related use of their personal vehicles, provided they have obtained proper authorization.

Calls made or received while driving require the use of a hands-free device, except in case of emergency. Text messaging and sending or viewing emails are strictly prohibited while driving.

6

EMPLOYEE PROGRAMS & PROCEDURES



6.1 | DRESS CODE POLICY

MBI strives to maintain a workplace environment that functions well and is free from unnecessary distractions. As part of that effort, the Company requires employees to maintain a neat and clean appearance that is appropriate for the workplace setting and for the work being performed. Employees who appear for work inappropriately dressed will be sent home and directed to return to work in proper attire. Under such circumstances, employees will not be compensated for the time away from work and can be subject to disciplinary action.

General Guidelines

Office Employees: Office employees are expected to maintain a professional appearance. Business-casual attire is appropriate.

Production Employees: Production employees should prioritize safety and functionality in their clothing choices. Their attire should be suitable for the nature of their work, ensuring comfort and protection.

Office Employee Dress Code

• Appropriate Attire

- Slacks, khakis, dress pants, skirts, knee length or longer shorts or jeans free from wear and holes.
- Collared shirts, blouses, sweaters, polo shirts or knit tops.
- Athletic footwear is appropriate as long as it is in clean and presentable condition. Sandals and open toed shoes are appropriate as long as they have a strap around the heel.

• Inappropriate Attire

- Sleeveless shirts or dresses (sleeveless means no fabric past your shoulder), tank tops, spaghetti straps, see through or mesh shirts. Shirts with controversial designs or slogans.
- Sweat pants, jogging suits, gym clothes, pajamas, shorts less than knee length and pants with excessive wear/holes.
- Anything exceptionally revealing. Which means showing more of the body than is usual or conventional and/or showing any undergarments.

- Flip-flops (light sandal with a thong between the big and second toe without a strap behind the heel), slides (footwear with a wide strap on the top of the foot without a heel strap) or Croc clogs.
- **Accessories**
 - Jewelry, accessories, and makeup should be tasteful and not cause disruption. Hats should not be worn.
- **Grooming**
 - Employees are expected to be well-groomed and wear clean clothing free from holes, tears, or other signs of wear. Clothing should be properly ironed with no wrinkles.

Production Employees Dress Code

- **Safety First**
 - While in contact with production material or machinery, employees must not wear loose fitting clothing, sandals, clogs or any open toe shoes.
 - Hair that touches your collar must be tied back and covered with a hair net or covered with a hair net and placed under a ball cap while operating machinery.
 - Loose jewelry must be removed or worn so as to not interfere with the safe operating of machinery.
 - Wear appropriate personal protective equipment (PPE) as required for the task.
- **Inappropriate Attire**
 - Sleeveless shirts (sleeveless means no fabric past your shoulder), tank tops, spaghetti straps, see through or mesh shirts. Shirts with controversial designs or slogans.
 - Sweat pants, jogging suits, gym clothes, pajamas, shorts less than knee length and pants with excessive wear/holes.
 - Anything exceptionally revealing. Which means showing more of the body than is usual or conventional and/or showing any undergarments.

Comfort and Functionality

Clothing should allow freedom of movement and be comfortable for physically demanding tasks.

Special Events or Client Meetings

On occasions when meeting with clients or attending special events, office employees may be required to dress in more formal business attire. Details will be communicated in advance.

Exceptions and Management Discretion

Exceptions to the dress code may be made for specific tasks or circumstances with manager approval. Management reserves the right to address any attire that is deemed inappropriate or disruptive.

Hygiene and Cleanliness

Maintain personal hygiene and cleanliness. Wear clean clothing free from holes, tears, or other signs of wear. Clothing should be properly ironed with no wrinkles.

Review and Changes

This policy is subject to periodic review and may be updated to reflect changing needs or circumstances.

6.2 | COMMUNICATIONS

Check all the electronic bulletin boards, outlook public folder, and payroll portal regularly to obtain important information about Company events and policies.

6.3 | GENERAL IT POLICY

MBI provides Information Technology (IT) facilities to support its business activities. IT facilities include all computing and communication equipment, software, services, data and dedicated building space used in connection with IT, which is owned by, leased by or used under license or agreement for MBI. MBI recognizes its responsibility to ensure the appropriate use of its IT facilities and that it must be protected from damage or liability resulting from unlawful or inappropriate use of its IT facilities.

MBI regulates employees' use of its electronic data and communications systems — including telephones, voicemail, internet, e-mail and other electronic systems.

MBI grants accounts to permit employees to either access IT services within the Company or to access IT facilities from a source external to the Company. **It is a requirement that every person who accesses MBI IT facilities must have an authorized account for their exclusive use.**

MBI IT facilities are to be used for MBI business purposes only.

MBI Employees who access remote accounts must comply in a manner that abides by the conditions of use of the remote computer system.

6.4 | SOFTWARE POLICY

MBI regulates computer software utilization and distribution. You may not duplicate licensed software or related assets for use, either on Company premises or elsewhere, unless expressly authorized to do so by written agreement with MBI and the licensor. You may not provide licensed software without the explicit consent of the IT partner.

All software that MBI acquires must be approved and obtained by the IT partner. Upon delivery, all software must be registered properly and installed by the IT partner. **Software and related assets may not be installed without first obtaining permission from the IT partner.**

All software created with IT assets and/or resources are the property of MBI.

6.5 | EQUIPMENT POLICY

All IT related equipment must remain on the premises at all times, unless specifically approved by Management.

Employees utilizing IT assets and equipment are required to sufficiently maintain equipment aesthetics; including but not limited to keyboard, mouse, monitor, exterior of the computer housing, phone, printer, etc. Non-company owned IT related equipment is prohibited; including but not limited to keyboard, mouse, monitor, etc. Non-company owned means MBI did not purchase the equipment for use.

6.6 | RESPONSIBILITIES

Employees utilizing MBI IT assets and resources are responsible for:

- Ensuring that confidentiality and privacy of data is maintained;
- The safekeeping of their username and password;
- Ensuring the security of their workstation by logging off or locking it when it is left unattended;
- Ensuring the security and privacy of print outs produced of non-public information;
- Compliance with all relevant state, federal and international law;
- Avoiding excessive use of IT resources;
- Compliance with quotas and or limits imposed via IT Company policy;
- Adherence to accepted community standards of expression when communicating with other people using IT assets or resources;
- Not harassing or causing annoyance to other users by direct or indirect communication;
- Not forging email messages, news articles, or any other type of electronic correspondence;
- Not using the username or password of other users;
- Keeping the exterior of their workstation and attached peripherals sufficiently maintained; and
- Obtaining explicit permission from the IT partner before installing software (of any kind).

6.7 | PRIVACY

Employees have no expectation of privacy in their use of IT assets and equipment. MBI has a legitimate right, but is not obligated, to inspect, and may inspect without notice or permission, all data on a computer system (regardless of data ownership) to prevent, detect or minimize unacceptable behavior on that computer system.

MBI may monitor or use any account, device or workstation without notice. MBI reserves the right, but is not obligated, to capture and inspect all data contained within Company resources, including data contained within the networking infrastructure owned by the Company.

In the course of carrying out computer system auditing operations, MBI may access and copy any file on any computer system owned by the Company.

MBI has the right to give to any appropriate employee or law enforcement bodies, any information it possesses regarding an employee's use of IT assets and resources.

6.8 | PASSWORD POLICY

Employees who are issued a user account are responsible for the strength and maintenance of their account password(s). Employees are responsible for the defense of any accounts held by them. The following guidelines for use of passwords shall apply:

- Passwords must be used where possible;
- Passwords must be at least 8 characters in length;
- Passwords must be changed regularly, within a period of 3 months;
- Passwords must not be displayed in a manner where they are easily seen by others;
- Users, when logging on, must not permit anyone to see their password being entered;
- Passwords must not be disclosed to others;
- Passwords should not be easily associated with a particular user;
- Users must not save passwords electronically within applications;
- Guest log-ons will be used only in special circumstances;
- **A user who realizes that a password has been compromised shall immediately change the password, if possible. The user is then required to immediately report all details of the breach to the IT partner; and**
- The use of automatic log-ons for workstations is not permitted, unless prior permission has been obtained from the IT partner.

6.9 | INTERNET SECURITY

The internet will be treated as a potentially hostile environment.

MBI will impose necessary restrictions on connections to/from any system under the Company's control.

For every system, access to the Internet will be provided via IT approved resources. Only explicitly permitted traffic will be allowed through the LAN/WAN bridge, all other traffic will be rejected.

All network traffic passing through the LAN/WAN bridge is logged and audited.

6.10 | INTERNET POLICY

Employees are not permitted to access the internet for any reason other than appropriate business activities. Employees do not have an expectation of privacy when using MBI internet,

6.11 | ELECTRONIC MAIL

MBI provides electronic mail (email) facilities to support its business functions. Any use of the facilities which interferes with these activities is forbidden.

The following are also forbidden in the use of email:

- Use for any purpose which is illegal under state, federal or international law;
- Use of another's identity;
- Concealment or misrepresentation of name or affiliations;
- Alteration of source or destination address, violation of any MBI policy; and
- Sending material which harasses, intimidates, abuses or offends others.

6.12 | VOICEMAIL

MBI provides voicemail as a convenience to staff and clients. Messages are to be retrieved throughout the day and calls promptly returned. Employees do not have a right to privacy when using MBI's voicemail system.

6.13 | CELL PHONES IN THE WORKPLACE

Use of cell phones during work is prohibited unless specifically being used for business purposes. Cell phone use must be limited to your lunch or break times. Employees found violating this policy will be subject to disciplinary action including termination.

6.14 | PERSONNEL FILES

An employee's original personnel file consists of the employment history, payroll/tax documents, training/acknowledgments, performance, beneficiary forms, and medical records. It is the employee's responsibility to notify the HR Department of any changes in name, address, telephone number, marital status, number of dependents, beneficiaries or the name of the person to notify in case of an emergency or accident.

Misrepresentation of any fact on your employment application or in your personnel file is sufficient reason for termination. Personnel records are considered property of MBI and are not available for review by employees.

Background Checks

MBI may conduct background checks on new employees. Employees who have falsified information on their employment application will be subject to discipline including termination.

6.15 | COMPANY PROPERTY, EQUIPMENT AND VEHICLES

When using MBI property, including computer equipment or hardware, exercise care, perform required maintenance and follow all operating instructions, safety standards and guidelines. Due to insurance regulations, only authorized personnel may operate MBI vehicles, including forklift trucks.

Notify your Manager if any equipment, machine or vehicle appears to be damaged, defective or in need of repair. This prompt reporting could prevent the equipment's deterioration and could also help prevent injury to you or others. Should you have questions about

the maintenance and care of any workplace equipment, ask your Manager.

If you use or operate equipment improperly, carelessly, negligently or unsafely, you may be disciplined or even discharged. In addition, you may be held financially responsible for any loss to MBI because of such mistreatment.

Use of a cellular device is prohibited when driving any Company vehicle or using Company equipment.

Please keep your work area neat and clean, and use normal care in handling Company property. You may not use any Company property for personal purposes or remove any Company property from the premises without prior written permission from your Manager.

6.16 | SOCIAL MEDIA POLICY

This policy establishes a set of rules and guidelines for any activity and participation in social media by all of the Company's users. These rules are intended to be adaptable to the changes in technology and norms of online communication and behavior, and may be amended by the Company at any time, for any reason, without notice to users.

For purposes of this policy:

The term "social media" applies to any web-based and mobile technologies, in use now or developed in the future, that enable individuals or entities to disseminate or receive information, communicate, or otherwise interact, and includes, without limitation, email, texting, messaging, social networking, blogging, micro-blogging, bulletin boards, and so on, through providers such as Facebook, LinkedIn, Twitter/X, YouTube, TikTok or others.

You are personally responsible for any of your social media activity conducted with a Company email address or on a Company website or page, and/or which can be traced back to the Company domain, and/or which uses the Company's Information Systems and/or which expressly or implicitly identifies you as an employee of the Company. While clocked in and/or on Company time, you should not actively post personal activity on any social media platforms.

If, from your post in a blog or elsewhere in social media, it is clear you are a Company employee, mention the Company, or it is reasonably clear you are referring to the Company or a position taken by the Company, and you express a political opinion or an opinion regarding the Company's positions or actions, the post must specifically note that the opinion expressed is your personal opinion and not the Company's position. This is necessary to preserve the Company's good will in the marketplace.

Observe and follow (i) existing Company policies and agreements, if applicable, (ii) the policies of the particular online/social networking venue, and (iii) applicable law. This means that you are prohibited from using social media to post or display comments about co-workers or managers or the Company that are vulgar, obscene, threatening, intimidating, or a violation of the Company's workplace policies against discrimination, harassment, or hostility on account of age, race, religion, sex, ethnicity, nationality, disability, or other protected class, status, or characteristic.

Most websites, including Facebook and others, have rules concerning the use and activity conducted on their sites. These are sometimes referred to as "Terms of Use." You must follow the established terms and conditions of use that have been established by the venue and not do anything that would violate those rules.

Do not post any information or conduct any online activity that may violate applicable local, state or federal laws or regulations. Any conduct which under the law is impermissible if expressed in any other form or forum is impermissible if expressed through social media.

Before sharing a comment, post, picture or video about or from a friend or colleague through any type of social media, it is a good practice to be courteous and first obtain his or her consent.

It also is inappropriate to use or disclose personal information (as explained below) about another individual or use or disclose the Company's confidential or proprietary information in any form of social media. For purposes of this policy, personal information means an individual's Social Security number, financial account number, driver's license number, medical information (including family medical

history) and other highly sensitive information, as well as, if applicable, information covered by the Company's written information security program. Company confidential or proprietary information includes but is not limited to internal information regarding the Company's finances, future business performance and business plans, business and brand strategies, and information which is or relates to Company trade secrets. All Company rules regarding Company confidential or proprietary information and personal information, including, as applicable, the Company's written information security program, apply in full to social media, such as blogs or social networking sites. For example, any information that cannot be disclosed through a conversation, a note, a letter or an e-mail also cannot be disclosed in a blog. Sharing this type of information, even unintentionally, can potentially result in harm to the individual, harm to the Company's business, and ultimately you and/or Company being sued by an individual, other businesses or the government.

Before posting any online material, ensure that the material is not knowingly false; instead, try to be accurate and truthful. If you find that you've made a mistake, admit it, apologize, correct it and move on. You should never post anything that is maliciously false.

Before posting a comment or responding to a blog, think before sending. If you are unsure about the effects of the post or other online action, you may wish to reach out to your manager for some assistance, particularly when unsure about a response to another employee or a client.

When participating in any social media, we suggest that you be completely transparent and disclose your true identity for your personal protection. Additionally, when commenting on or promoting any Company product or service on any form of social media, you must clearly and conspicuously disclose your relationship with the Company to the members and readers of that social media.

Do not use your own personal online relationships or the Company's network to influence polls, rankings, or web traffic. This is called "astroturfing" or "sock-puppeting" and is highly unethical. You are not to use the size and breadth of the Company network to unduly influence polls, rankings, or web traffic where said traffic is a measure of success or popularity of a particular political opinion.

The Company may access and monitor its information systems and obtain the communications within the systems, including email, Internet usage, and the like, with or without notice to users of the system, in the ordinary course of business when we deem it appropriate to do so. As such, when using such systems, you should have no expectation of privacy with regard to time, frequency, content or other aspects of your use, including the websites you visit and other Internet/Intranet activity. The reasons the Company accesses and monitors these systems include, but are not limited to: maintaining the system; preventing or investigating allegations of system abuse or misuse; assuring compliance with software copyright laws; and complying with legal and regulatory requirements.

The Company respects the right of any employee to participate in social media, such as maintaining a blog or participating in online forums. However, to protect the Company's interests and to oversee employees' focus on their job duties, employees must avoid the use of social media during work time or at any time with the Company equipment or property which adversely affects work performance. Social media must be used during break and lunch times only.

If a blogger or any other online influencer posts a statement you disagree with, you can voice your opinion, but we suggest that you do not escalate the conversation to a heated, personal argument. Speak reasonably, factually, and with good humor. Try to understand and credit the other person's point of view. Additionally, avoid communicating with hostile personalities in an effort to avoid personal, professional, or credibility attacks.

When publishing any online material through social media that includes another's direct or paraphrased quotes, thoughts, ideas, photos, or videos, always use citations and link to the original material where applicable.

Nothing in this policy is intended to negate an employee's rights under the NLRA.

6.17 | ARTIFICIAL INTELLIGENCE POLICY

Purpose:

This policy defines requirements for the safe, secure, and responsible use of generative AI Chatbots when conducting business for MBI Direct Mail + Digital, Inc. (MBI). It is intended to reduce security, privacy, legal, and operational risk while enabling productivity benefits.

Scope and Framework Alignment:

Scope: This policy applies to all workforce members, including employees, contractors, interns, temporary workers, and third parties who use AI Chatbots on behalf of MBI.

Systems in scope: AI Chatbots accessed through web, desktop, mobile, API integrations, and AI features embedded in enterprise applications, including productivity suites and business platforms. Any third-party or publicly available GenAI tools, including ChatGPT, Google Bard, DALL-E, Midjourney, and other similar applications that mimic human intelligence to generate answers, work product, or perform certain tasks.

Out of scope: Non-generative rule-based Chatbots, traditional scripted automation, and analytics tools that do not generate new content, unless they provide a generative interface.

Framework alignment: This policy is aligned to the NIST AI Risk Management Framework (AI RMF 1.0) and maps controls and oversight activities to the AI RMF core functions: Govern, Map, Measure, and Manage.

Definitions:

Generative AI Chatbot: A system that generates natural-language output in response to user prompts, including text, images, code, summaries, or other generated content through chat or prompt-based interfaces.

"Artificial Intelligence" or "AI": A machine-based system that can, for a given set of human-defined objectives, make predictions, recommendations or decisions influencing real or virtual environments. Artificial intelligence systems use machine and human based inputs to perceive real and virtual environments; abstract such perceptions into models through analysis in an automated manner; and use model inference to formulate options for information or action.

“Generative Artificial Intelligence” or “Generative AI”: The class of AI models that emulate the structure and characteristics of input data in order to generate content such as images, videos, audio, text or other digital content.

AI-Generated Content: Any output created in whole or in part by an AI Chatbot.

Prompt / Input: Information a user submits to an AI Chatbot, including text, files, screenshots, copied content, or other uploaded materials.

Output: The response returned by an AI Chatbot.

Sensitive Data: Any data that requires protection due to confidentiality, privacy, regulatory, contractual, or business requirements, including the data types described in Section 7.

Approved Tool: An AI Chatbot platform explicitly approved by MBI for business use under this policy.

Approved Use Case: A business task approved for AI Chatbot use, potentially with constraints such as data type, audience, human review, or logging requirements.

Organization-Managed Account: A user account over which a company has full administrative control, ownership, and visibility, often verified by a company-owned email domain.

Policy Statement:

AI Chatbots may be used for approved business purposes when all of the following conditions are met:

1. The tool is approved by MBI management and accessed using an organization-managed account not to be shared with third parties. Personal accounts must not be used for MBI business work.
2. Inputs do not include prohibited data types, and sensitive data is handled only under explicit, documented approval.
3. Outputs are reviewed by a human before they are relied upon, shared externally, or used to make decisions.
4. Users complete required training and follow this policy and related security, privacy, HR, and communications policies.

Approved AI Tools and Onboarding Requirements:

Approved Tools

Only tools approved by MBI management may be used for business purposes.

Prohibited without explicit written approval: public free Chatbots, browser extensions or plugins, personal subscriptions, and tools

that do not support appropriate enterprise controls, contractual protections, and data processing terms.

New Tool Request and Vendor Due Diligence

Requests for new AI tools must be submitted to management.

Role Based Access and Account Controls:

Access Control Requirements

Access must use single sign-on where available and enforce multi-factor authentication. MBI will apply least-privilege access by enabling features, plugins, data connectors, and file upload capabilities only for roles that need them. Anonymous sharing or unrestricted export features must be disabled unless explicitly required and approved.

Role Tiers

Role Tier	Who	Permitted Capabilities	Notes & Constraints
Tier A - General User	All staff	Drafting, summarization, brainstorming, grammar and style support	No sensitive data; human review required before distribution
Tier B - Power User	Designated teams or users	Data transformation on approved non-sensitive datasets; approved templates; advanced prompting	Additional training required; sample prompts or use cases may be logged
Tier C - Restricted	Legal, HR, Finance, IT, Security, and other approved functions	Use cases involving sensitive data under documented approval	Requires approved tool, documented use case, enhanced review, and retention controls
Tier D - Admin	Upper Management	User administration, connectors, logging, security settings	Separate admin accounts and change control required

Data Protection and Handling Requirements:

Data Classification

Users must classify data before using AI tools. If unsure, treat the information as Sensitive Data and do not input it until clarified.

Data Type	Examples	Allowed in AI Chatbots	Conditions
Public	Published marketing copy, public website content, approved public materials	Yes	Use approved tools; review output for accuracy, claims, tone, and brand alignment
Internal	Non-public policies, internal process documents, internal communications	Yes, preferred only in approved tools	No credentials, secrets, or restricted information; avoid proprietary source code unless approved
Confidential	Customer lists, contracts, non-public financials, pricing, strategy, mail files, campaign data, or vendor terms	Only with approval	Must use approved enterprise controls; minimize data; human review required; retention limits apply
Regulated/Highly Sensitive	PHI, PCI, SSN, bank account numbers, payroll tax data, secrets, private keys, authentication tokens	No by default	Only if a specific use case is approved by Legal/Privacy and the tool contract and technical controls support it

Prohibited Inputs

MBI users must not submit any of the following into AI Chatbots unless a specific use case has been formally approved in writing by the appropriate MBI management and the tool has the required contractual and technical controls:

- Passwords, MFA seeds, API keys, private keys, tokens, credentials, or secrets of any kind.
- Un-redacted regulated personal data, including Social Security numbers, payment card data, protected health information, bank account numbers, tax identifiers, payroll information, or similar regulated information.
- Client, customer, prospect, or vendor confidential information without written authorization and an approved use case.

- Customer lists, mailing lists, campaign files, variable data, production files, recipient addresses, demographic data, or other customer-related data unless specifically approved.
- Export-controlled data or information restricted by law, contract, nondisclosure agreement, customer agreement, or data processing agreement without Legal approval.
- Information that is protected by law and/or would violate privacy, security, confidentiality, or contractual obligations if shared with an AI tool.

Allowed Inputs with Safeguards

Where AI use is allowed, users must minimize data by redacting identifiers, removing unnecessary details, and sharing only what is necessary for the task. Users should prefer summaries, synthetic examples, or anonymized excerpts over raw business, customer, or personal data.

Data Retention and Logging

AI usage must be auditable and adhere to MBI's record retention policy. Users must not delete, bypass, or tamper with AI usage logs.

Connectors and File Uploads

Connecting AI tools to internal repositories such as email, shared drives, ticketing systems, CRM systems, source repositories, or customer systems requires explicit approval and security review. File uploads must follow malware scanning, data loss prevention, and data classification requirements.

Acceptable Use and Prohibited Activities:

Acceptable Use

Acceptable uses include:

- Drafting and improving non-sensitive communications, documentation, checklists, outlines, and internal process content.
- Summarizing long documents when the source is authorized for the user and does not contain prohibited data.
- Generating first-pass ideas, outlines, lists, training aids, or checklists that will be verified by a human subject matter expert.
- Assisting with code, formulas, data cleanup, or productivity tasks only within approved repositories, approved data sets, and approved tools.
- Improving grammar, readability, accessibility, tone, or

formatting of non-sensitive materials.

Prohibited Activities

MBI users must not use AI Chatbots to:

- Generate, facilitate, or promote harassment, discrimination, retaliation, bullying, threats, or inappropriate content.
- Create misleading, deceptive, fraudulent, defamatory, or impersonated content.
- Use AI outputs as the sole basis for employment, credit, legal, medical, safety, contractual, compliance, disciplinary, or other high-impact decisions.
- Represent AI-generated content as wholly human-created when authenticity is required, including sworn statements, certifications, attestations, compliance submissions, or formal approvals.
- Attempt to bypass security controls, access restrictions, logging, content filters, DLP controls, customer restrictions, or other safeguards.
- Create malware, exploit code, credential theft materials, phishing content, evasion techniques, or instructions intended for wrongdoing.
- Use AI to process or transform customer, mail, recipient, or regulated data outside an approved use case.
- Publish or send AI-generated external content without human review and any required disclosure or approval.

Human Review, Accuracy, and Quality Controls

All AI-generated content must be reviewed by a human before it is:

1. Sent externally to customers, prospects, vendors, partners, regulators, or the public.
2. Used to make or support business decisions, employment decisions, customer commitments, production decisions, compliance decisions, or contractual decisions.
3. Used in customer commitments, proposals, and contracts, statements of work, invoices, compliance materials, legal materials, security materials, or policy materials.
4. Published on websites, social media, marketing collateral, training content, customer-facing portals, or external communications.

Reviewers must check for:

- Factual accuracy and completeness.
- Hallucinations, unsupported claims, outdated information, or

fabricated citations.

- Confidentiality, privacy, customer data, or security leaks.
- IP, copyright, trademark, licensing, or third-party rights concerns.
- Inappropriate claims, especially legal, security, medical, financial, regulatory, and technical, delivery, or performance claims.
- Brand, tone, accessibility, grammar, and customer communication standards.
- Consistency with MBI policies, customer obligations, contractual requirements, and applicable law.

Human review does not transfer accountability to the AI tool. The MBI user remain responsible for the final content and any decisions made using AI-assisted work.

Transparency and Disclosure

When AI assistance materially contributes to externally shared content, include a disclosure when appropriate or required, such as:

This content was created with the assistance of an AI system and reviewed by a human.

Internal disclosure should follow team norms. Disclosure is recommended for substantive documents, analyses, recommendations, or decisions where provenance matters.

Intellectual Property, Copyright, and Legal Considerations

Users must not input third-party confidential information, customer confidential information, licensed content, or proprietary materials unless authorized. AI outputs may inadvertently reproduce copyrighted or restricted material; users must verify originality and usage rights before publication or distribution.

This policy does not constitute legal advice. Coordinate with MBI management on regulatory, contractual, customer, or intellectual property obligations.

Security and Privacy Incident Reporting

Incident Response

- A formal incident response plan is established for AI-related

misuse, security breaches, or policy violations.

- Continuous monitoring systems and regular audits will track AI usage logs and identify potential compliance issues.

Report immediately to IT/Security and create a ticket in MBI's help desk or designated ticketing system if any of the following occurs:

- Sensitive data was entered into an unapproved tool or shared improperly.
- An AI tool account compromise is suspected.
- Unexpected tool behavior suggests data exposure, such as outputs containing other customers' data or unauthorized information.
- A policy violation, misuse, or near miss occurs.
- AI-generated content is discovered to contain material errors after distribution or use in a decision.

Incident handling will include evidence preservation, vendor notification, customer notification analysis, legal/privacy evaluation, and corrective action as required.

Training and Awareness

Completion of AI usage training is required before access is granted and at least annually thereafter. Training must cover data handling, prompt hygiene, output verification, IP/copyright, approved tools, prohibited inputs, prohibited activities, disclosure expectations, and incident reporting.

Ongoing Education

- Annual Training
- Additional training may be required based on role changes or policy updates.

Roles and Responsibilities

Management is responsible for approving new AI tools, setting configuration, approval of high-risk use cases, responding to AI-related incidents and consulting legal team as needed.

Human Resources is responsible for training.

Exceptions and Risk Acceptance

Any exception to this policy requires written approval from MBI

management and Privacy/Legal or designated executive approver, with documented compensating controls, risk acceptance, and an expiration date. Exceptions must be reviewed before renewal.

Monitoring and Continuous Improvement

MBI management will monitor AI tool usage for policy compliance, conduct periodic reviews of approved tools and use cases, and update controls based on incidents, audits, customer requirements, vendor changes, and regulatory developments.

Policy Review

This policy will be reviewed periodically to ensure its effectiveness, relevance, and compliance with changing needs, best practices, and legal requirements.

Policy Violations and Enforcement

Violations of this policy may result in:

- Disciplinary action up to and including termination of employment
- Immediate revocation of AI tool access privileges
- Comprehensive compliance review and additional oversight measures
- Legal action if violations result in regulatory non-compliance or significant organizational harm

NIST AI RMF Mapping

Govern: Roles and responsibilities, training, approvals, exceptions, monitoring, and accountability are addressed in Sections 5, 13, 14, 15, and 16.

Map: Approved use cases, data classification, and acceptable use expectations are addressed in Sections 4, 7, and 8 to identify context, impacts, and risk.

Measure: Logging, human review controls, quality controls, and periodic assessments are addressed in Sections 7.4, 9, and 16 to evaluate effectiveness and emerging issues.

Manage: Tool onboarding, access controls, incident response, and continuous improvement actions are addressed in Sections 5, 6, 12, and 16.

Appendix A: Quick User Checklist

Before using an AI Chatbot for MBI work, confirm:

- Am I using an MBI-approved AI tool with my work account?
- Does my prompt avoid secrets, regulated data, customer confidential information, and other prohibited inputs?
- Did I minimize or redact data to the least necessary for the task?
- Is the use case allowed for the tool, data type, and audience?
- Will I verify the output before sharing or acting on it?
- If sharing externally, did I add disclosure when appropriate and obtain required approval?
- Do I know how to report an incident or suspected misuse?

***By electronically signing, I acknowledge I have read, understand and agree to this document**



EMPLOYEE HANDBOOK