Twin Lakes Management Co.

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BOARD OF DIRECTORS
Jeff Marchini – *Division 1*
Mario Bandoni – *Division 2*
Stephanie Dietz – *Division 3*
Eric Cabral – *Division 4*
Ben Migliazzo – *Division 5*

John Sweigard – *President*
Phillip McMurray – *General Counsel*

TWIN LAKES MANAGEMENT COMPANY
BOARD MEETING

Tuesday, December 17, 2024

11:00AM
or immediately following the meeting of the MID Board of Directors

Franklin Yard Facility
3321 N. Franklin Road
Merced, CA 95348

AGENDA

CALL TO ORDER

PLEDGE OF ALLEGIANCE

ROLL CALL

CONSIDER CORRECTIONS OR ADDITIONS TO THE AGENDA

The Board will consider corrections or additions to the agenda of items requiring immediate action that have come to the attention of the Board after posting of the agenda.

OPPORTUNITY FOR PUBLIC COMMENT (5 minutes per speaker)

This time is provided for the public to address the Board on matters of concern. Matters presented under this heading may be discussed but no action will be taken by the Board at this time.

CONSENT CALENDAR

All matters listed under Consent Calendar are considered by the Board of Directors and will be adopted by one action of the board unless any Board Member has any question or wishes to make a statement or

discuss an item. In that event, the Chair of the Board will remove that item from the Consent Calendar and place it for separate consideration.

1. Unapproved Minutes – September 17, 2024

ACTION/DISCUSSION

1. Revisions to the TLMC Employee Handbook

REPORT ITEMS

1. Operations/Financial Update

CLOSED SESSION

NOTE: No action may be taken on any items not appearing on this agenda unless:
: There is a finding of an emergency situation by majority.
: A two-thirds vote of the legislative body or a unanimous vote if less than two-thirds of the members are present.
: An item was properly posted, but carried over for five days.

Any materials that are public records that relate to an agenda item, and are distributed to the Board of Directors less than 72 hours prior to the meeting shall be available for public inspection at the offices of the Twin Lakes Management Company, 744 W. 20th Street, Merced, CA during normal business hours. Additionally, any materials presented during open session are available for public inspection at the same address.

TWIN LAKES MANAGEMENT COMPANY
BOARD MEETING
UNAPPROVED MINUTES
REGULAR MEETING

September 17, 2024

The Board of Directors ("Board") of the Twin Lakes Management Company ("TLMC") met on the above date, pursuant to notice at 12:35 P.M. at the Franklin Yard facility for the Merced Irrigation District, located at 3321 N. Franklin Road, Merced, CA 95348.

ROLL CALL

Roll call showed the following Directors present:

Directors:

Mario Bandoni, Chair
Eric Cabral, Vice Chair
Jeff Marchini
Ben Migliazzo

Roll call showed the following Directors excused:

Directors:

Stephanie Dietz

The following TLMC employees were also present:

Chief Executive Officer	John Sweigard
General Counsel	Phillip McMurray
Chief Operating Officer/Treasurer/Chief Financial Officer	Don Knapp

The following MID employees were also present:

Manager of Parks and Recreation	Brooke Gutierrez
Manager of Government and Public Relations	Mike Jensen
Executive Assistant to the General Manager	Sara Supple

CHANGES/ADDITIONS TO THE AGENDA

None

PUBLIC COMMENT

None

CONSENT CALENDAR

Unapproved Minutes – May 14, 2024

Director Marchini made a motion to approve the Consent Calendar as presented, seconded by Director Cabral; the Board unanimously approved the motion. The votes on the motion were as follows:

Ayes:	Marchini, Bandoni, Cabral, Migliazzo
Noes:	None
Abstain:	None
Absent:	Dietz

ACTION/DISCUSSION ITEMS

None

REPORT ITEMS

Chief Operating Officer and Chief Financial Officer Mr. Don Knapp provided the Board with an operations/financial update.

Mr. Knapp provided a boatyard update, stating that the recent construction on the barge has been completed and the barge has been launched. There are currently 17 boats in the boatyard, noting that it used to be 27 and is now more manageable. There are currently 12 boats waiting for open spots to begin work, and 3 potentially coming out. Mr. Knapp stated that 2 boats in the boatyard were not responding, but there is plenty of work in the queue otherwise.

Mr. Knapp provided a marina update, including the Reel Deel Market & Café at Barrett Cove. Mr. Knapp reviewed off-season roof repair options. He stated that monthly sales were increased throughout the summer.

Mr. Knapp provided a mooring update. As the lake drops, staff will be repositioning the mooring lines. Mr. Knapp stated the Arnold lines D & E are anchored back to their original positions, and all displaced boats are moved back to their assigned buoys. Annual mooring line inspections will take place in the next month or two. Mr. Knapp noted there is a new barge in-action, and he reviewed minor repairs that would be performed after several months of operation.

Mr. Knapp provided a financial update, including financial gains and losses for the boatyard, marina, and mooring for the second quarter of the year. Mr. Knapp also reviewed the TLMC debt history and projections through 2030.

ADJOURNMENT

The meeting was adjourned at approximately 12:55 PM.

Eric Cabral, Vice Chair/Secretary

APPROVED:

Mario Bandoni, Chair

MEETING OF THE TLMC BOARD OF DIRECTORS OF THE MERCED IRRIGATION DISTRICT

DATE: December 17, 2024

SUBJECT: The Board will review and consider adopting revisions to the TLMC Employee Handbook.

STAFF CONTACT: Don Knapp

DEPARTMENT: Finance

RECOMMENDED ACTION: Staff recommends the Board adopt the proposed revisions to the TLMC's Employee Handbook, as presented.

BACKGROUND & DISCUSSION:

The TLMC Board has adopted an Employee Handbook, setting forth a variety of policies intended to guide TLMC and staff through the administration of various aspects of TLMC business. TLMC updates the Employee Handbook from time to time, generally on an as-needed basis. The last update was adopted by the Board of Directors on August 17, 2015.

Attached to this background report is a copy of the TLMC Employee Handbook, together with red-lined track changes indicating a variety of revisions proposed by staff intended to clarify, consolidate, and modernize and/or update certain policies. However, the primary change to the handbook is an update to the list of TLMC holidays.

Staff will be available at the Board's meeting to provide a presentation summarizing the proposed changes, and to answer any questions.

PROS AND CONS OF RECOMMENDED ACTION:

ALTERNATIVES:

DEPARTMENT CONCURRENCES:

FISCAL IMPACT:

Twin Lakes Management Co.

EMPLOYEE HANDBOOK

Twin Lakes Management Co.

TWIN LAKES MANAGEMENT COMPANY

EMPLOYEE HANDBOOK

Our handbook was developed to get you acquainted with Twin Lakes Management Company and some of its policies and procedures as they apply to your employment with Twin Lakes Management Company. It also describes our Open Door Policy, which provides a means of communication for you and your fellow employees.

We hope you will take pride in your work and Twin Lakes Management Company. Employee dedication to teamwork will assure increased productivity and a long and pleasant employee – employer relationship. Twin Lakes Management Company. considers itself to be a responsible member of the community, a contributor of economic benefits to society, a provider of goods and services, and committed to furnishing fair, impartial and prompt service to our customers.

The following Twin Lakes Management Company Employee Handbook constitutes operational guidelines for Twin Lakes Management Company Employees. It is not possible, nor intended that these guidelines be exhaustive or definitive. Rather, they are intended to set forth guidelines for daily working circumstances. Should you need further information or if you would like to discuss any policies in the handbook, please feel free to speak to your supervisor.

THIS HANDBOOK DOES NOT CREATE ANY CONTRACT OF EMPLOYMENT, EXPRESSED OR IMPLIED, OR ANY RIGHTS IN THE NATURE OF A CONTRACT.

Twin Lakes Management Co.

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1. DEFINITIONS

The following definitions shall apply in interpreting the provisions of this handbook.

"**At-Will Employee**" is defined as any employee who is hired by Twin Lakes Management Company. At will employees may be terminated at any time, with or without cause, and with or without notice, at the option of either Twin Lakes Management Company or the employee. At-will employment status cannot be amended, modified, or altered in any way by verbal statements and can only be altered by written amendment signed by the President of Twin Lakes Management Company.

"**Regular Employee**" is defined as an employee who works 30+ hours in a regularly established job.

"**Part-Time Employee**" is defined as an employee who is hired at an hourly rate of pay and who works less than an average of 30 hours per week. Part-time employees are not eligible for holiday pay, premium pay, vacation, or any other supplemental pay and shall accrue no benefits, except those dictated by law.

"**Temporary (Seasonal) Employee**" is defined as an employee who is hired for occasional or seasonal work, for a period not to exceed one hundred and twenty (120) days. Temporary employees are not eligible for holiday pay or vacation and shall accrue no benefits, except those dictated by law.

2. EQUAL EMPLOYMENT OPPORTUNITY

Our goal at Twin Lakes Management Company is to recruit, hire, and maintain a diverse workforce. Equal employment opportunity is good business as well as being the law and applies to all areas of employment, including recruitment, selection, hiring, training, transfer, promotion, termination, compensation, and benefits.

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Twin Lakes Management Company is an equal opportunity employer. Twin Lakes Management Company prohibits discrimination against employees or applicants for employment on the basis of race, color, religion, sex (including pregnancy), gender identity, creed, national origin, ancestry, genetic information, citizenship status, age, familial status, veteran status, physical or mental disability, medical condition, sexual orientation(including heterosexuality, homosexuality and bisexuality), exercise of rights under the Family Medical Leave Act or the California Family Rights Act, or any other basis protected by law. Twin Lakes Management Company will afford equal employment opportunity to all qualified employees and applicants as to all terms and conditions of employment, including compensation, hiring, training, promotion, transfer, discipline, and termination. Employees or applicants who believe they have experienced any form of employment discrimination are encouraged to report this immediately to a manager, supervisor or the Human Resources Department.

Twin Lakes Management Company supports the goals and spirit of the state and federal disability laws and will make every effort to provide reasonable accommodation for physical and mental disabilities of job applicants and employees. Twin Lakes Management Company will make reasonable accommodations for individuals who have a known disability or who otherwise make their disability known to Twin Lakes Management Company, unless undue hardship would result.

Any applicant or employee who requires an accommodation in order to perform the essential functions of the job should consult the Human Resources Department. The employee and Twin Lakes Management Company should engage in a good faith interactive process to determine what, if any, effective accommodations can be made for the employee or applicant.
If you believe that you have been subjected to any form of unlawful discrimination, you must report it immediately to your Supervisor or the Human Resources Department as soon as possible. Twin Lakes Management Company will immediately undertake an effective, thorough and objective investigation and attempt to resolve the situation. The investigation will be kept confidential to the extent possible.

Twin Lakes Management Company prohibits and will not tolerate retaliation against any employee for reporting discrimination, or for participating in any investigation of a complaint of discrimination or perceived discrimination.

3. AT-WILL EMPLOYMENT

Nothing contained in this handbook or any other materials or information distributed by the organization creates a contract of employment between an employee and Twin Lakes Management Company. Employees who are hired by Twin Lakes Management Company may be terminated at any time, with or without cause, and with or without notice, at the option of either Twin Lakes Management Company or the employee. This at-will employment policy cannot be amended, modified, or altered in any way by verbal statements and can only be altered by written amendment signed by the President of Twin Lakes Management Company.

4. PROBATIONARY/INTRODUCTORY PERIOD

All employees are required to complete an introductory period of ninety (90) days. This introductory period is meant to allow new employees time to become familiar with Twin Lakes Management Company, and with their job duties. Both during the introductory period and upon its completion, employees may be terminated at any time, with or without cause, and with or without notice, at the option of either Twin Lakes Management Company or the employee.

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5. HARASSMENT/DISCRIMINATION/RETALIATION PREVENTION POLICY

Twin Lakes Management Company strives to maintain a workplace that fosters mutual employee respect and promotes harmonious, productive working relationships. Our organization believes that discrimination, harassment, and/or retaliation in any form constitute misconduct that undermines the integrity of the employment relationship. Therefore, Twin Lakes Management Company prohibits harassment or discrimination on the basis of any of the following protected classifications: an individual's race, color, religion, sex (including pregnancy), gender identity, creed, national origin, ancestry, genetic information, citizenship status, age, familial status, veteran status, physical or mental disability, medical condition, sexual orientation(including heterosexuality, homosexuality and bisexuality), exercise of rights under the Family Medical Leave Act or the California Family Rights Act, or any other basis protected by law. . This policy applies to all employees throughout the organization and to all individuals who may have contact with any employee of this organization. Furthermore, Twin Lakes Management Company will make reasonable accommodations for qualified individuals with

known disabilities unless doing so would result in an undue hardship, health, or safety concern.

Unwelcome sexual advances, requests for sexual favors, or other verbal, visual, or physical conduct of a harassing and/or discriminatory nature will constitute harassment and/or discrimination when the person involved feels compelled to submit to that misconduct in order to keep his/her position, to receive appropriate pay, or to benefit from certain employment decisions. If this type of misconduct interferes with an employee's work or creates an intimidating, hostile, or offensive work environment, it also may be considered harassment and/or discrimination. This behavior can include but is not limited to suggestive or insulting noises, facial expressions, vulgar language, nicknames, slurs, derogatory comments, cartoons, jokes, written materials, and offensive gestures or touching.

Twin Lakes Management Company expects that everyone will act responsibly to establish a pleasant and friendly work environment. However, if an employee feels he/she has been subjected to any form of harassment and/or discrimination, the employee should report that conduct to his/her immediate supervisor, another member of management, or Human Resources within three calendar days of the offense. Employees are not required to approach the person who is harassing and/or discriminating against them, and they may bypass any offending member of management. The person the harassment or discrimination is reported to will take the necessary steps to initiate an investigation of the discrimination and/or harassment claim.

Twin Lakes Management Company will conduct its investigation in as confidential a manner as possible. Interviews, allegations, statements, and identities will be kept confidential to the extent possible and allowed by law. However, Twin Lakes Management Company will not allow the goal of confidentiality to be a deterrent to an effective investigation. A timely resolution of each complaint will be reached and communicated to the employee. Appropriate corrective action, up to and including termination, will be taken promptly against any employee engaging in discrimination and/or harassment. The corrective action issued will be proportional to the severity of the conduct. The alleged harasser's employment history and any similar complaints of prior unlawful discrimination and/or harassment will be taken into consideration.

Twin Lakes Management Company prohibits retaliation of any kind against employees, who, in good faith, report harassment and/or discrimination or assist in investigating such complaints. If an employee feels he/she has been subjected to any form of retaliation, the employee should report that conduct to his/her immediate supervisor, another member of management, or Human Resources immediately. Employees are not required to approach the person who is retaliating against them, and they may bypass any offending member of management.

Romantic and Sexual Relationships Between Supervisors and Subordinates

Romantic or sexual relationships between supervisors and subordinate employees are discouraged. There is an inherent imbalance of power and potential for exploitation in such relationships. The relationship may create an appearance of impropriety and lead to charges of favoritism by other employees. A welcome sexual relationship may change, with the result that sexual conduct that was once welcome becomes unwelcome and harassing. Therefore, any employee involved in a romantic or sexual relationship with his/her supervisor or a subordinate employee must immediately report such a relationship to the Human Resources Department.

Reporting Harassment, Discrimination or Retaliation

An applicant, employee, officer or contractor who feels he/she has been harassed, discriminated against or retaliated against in violation of this policy should report the conduct immediately as outlined below so that the complaint can be resolved quickly and fairly.

- Object to the Conduct
  Sometimes an individual is unaware that his/her conduct is offensive. The offensive behavior may be eliminated by simply informing the offender that the conduct or language in question is unwelcome and offensive and request that it be discontinued immediately. A person who believes he/she is being harassed is encouraged to use this process.

- If the conduct in question continues after the offending person has been informed it is offensive, or if a person does not feel comfortable talking to the offending person directly, the employee should make a report in accordance with subsection 2 below or go directly to the formal reporting process.

- Verbal Report
  If a person who believes this policy has been violated, he/she should report the conduct to a supervisor, member of management or a Human Resources Department representative. Any supervisory or management employee who receives such a report **MUST** in turn direct it to the Human Resources Department. The Human Resources Department will determine what level of investigation and response is necessary.

- Written Process
  An individual who believes this policy has been violated may provide a written complaint to a supervisor or any management employee who in turn must direct the complaint to the Human Resources Department.

- Option to Report to Outside Administrative Agencies
  Applicants, employees, officers and contractors have the option to report harassment, discrimination or retaliation to the California Department of Fair Employment and Housing (DFEH) or the Equal Employment Opportunity Commission (EEOC).

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Responsibilities of Employees, Management and Supervisory Employees

1. Employees

In order to establish and maintain a professional working environment, while at the same time preventing harassment, discrimination and retaliation, employees are expected to:

- Set an example of acceptable conduct by not participating in or provoking behavior that violates this policy. Try not to be angry or insulted if an individual tells you that your behavior is offensive. People have different ethical values and standards and may be offended by behavior you think is proper. Tell the individual you did not realize your behavior was offensive, and immediately cease the conduct.
- Let fellow employees know when you consider behavior offensive. Twin Lakes Management Company hires people from a wide variety of cultural and ethnic

backgrounds, and an individual may not realize behavior he/she thinks is proper could be seen by others as offensive.

- Report harassment, discrimination or retaliation as quickly as possible, whether you are the target of the conduct or a witness.
- If an employee witnesses harassment, he/she should tell the individual being harassed that Twin Lakes Management Company has a policy prohibiting such behavior, and that he/she can demand that the harasser cease the behavior.
- Maintain confidentiality as required by this policy.
- Fully cooperate with Twin Lakes Management Company's investigation of complaints made under this policy.

2. Managers and Supervisors

In addition to the responsibilities listed above, managers and supervisors are responsible for the following:

- Implementing this policy by taking all complaints seriously and modeling behavior that is consistent with this policy. Managers and supervisors **MUST** direct all complaints to the Human Resources Department.
- Taking positive steps to eliminate any form of harassment, discrimination or retaliation observed or brought to his/her attention.
- Making sure no supervisor or other employee retaliates through any action of intimidation, restraint, coercion or discrimination.
- Monitoring the work environment and taking appropriate action to stop potential policy violations.
- Following up with those who have complained to ensure the behavior complained of has ceased.

6. REASONABLE ACCOMMODATION

Twin Lakes Management Company provides employment-related reasonable accommodations to qualified employees and applicants with disabilities within the meaning of the California Fair Employment and Housing Act and the Americans with Disabilities Act.

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Request for Accommodation

An employee who desires a reasonable accommodation in order to perform essential job functions should make such a request in writing to the Human Resources Department. The request must identify: a) the job-related functions at issue; and b) the desired accommodation(s).

Reasonable Documentation of Disability

Following receipt of the request, the Human Resources Department may require additional information, such as reasonable documentation of the existence of a disability.

Fitness for Duty Examination

Twin Lakes Management Company may require an employee to undergo a fitness for duty examination at Twin Lakes Management Company's expense to determine whether the employee can perform the essential functions of the job with or without reasonable

accommodation. Twin Lakes Management Company may also require an approved physician conduct the examination.

Interactive Process Discussion

After receipt of reasonable documentation of disability and/or a fitness for duty report, Twin Lakes Management Company will arrange for a discussion, in person or via telephone conference call, with the applicant or employee, and his/her representative(s), if any. The purpose of the discussion is to work in good faith to fully consider all feasible potential reasonable accommodations.

Case-by-Case Determination

Twin Lakes Management Company determines, in its sole discretion, whether reasonable accommodation(s) can be made, and the type of accommodation(s) to provide. Twin Lakes Management Company will not provide accommodation(s) that would pose an undue hardship upon Company finances or operations, or that would endanger the health or safety of the employee or others. Twin Lakes Management Company will inform the employee of its decision as to reasonable accommodation(s) in writing.

7. FITNESS FOR DUTY

After a conditional offer of employment has been extended to an applicant, Twin Lakes Management Company may, in compliance with all applicable laws, require the applicant to submit to a fitness for duty examination prior to conferring appointment. A conditional offer of employment may include the transfer of an existing employee for any reason including, promotion, demotion, voluntary or involuntary transfer.

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The Human Resources Department may require an employee to submit to a fitness for duty examination to determine if the employee is able to perform the essential functions of his/her job when: 1) the employee appears to be unable to perform or has difficulty performing one or more essential functions of his or her job; and 2) there is reason to question the employee's ability to safely or efficiently complete work duties.

8. SAFETY

Twin Lakes Management Company is committed to preventing accidents and providing a safe work environment. It is imperative that employees understand and respond to Twin Lakes Management Company's safety program. All employees must actively participate in making Twin Lakes Management Company a safe place to work.

Guidelines:

1. Each area must develop its own set of safety rules and guidelines to address apparent safety issues in the area, if any. At a minimum follow the Code of Safe Practices for your Department that is contained in the Injury and Illness Prevention Program.

2. All employees are required to follow all safety rules and practice good safety work habits as a condition of employment. Failure to do so may result in disciplinary action, up to and including termination.

3. Employees are required to report any and all safety concerns and injuries to their immediate Supervisor. Report all near misses to your immediate supervisor as soon as possible.

4. Participate in the Safety Talks every ten work days at a minimum.

9. WORKPLACE VIOLENCE / SECURITY

The safety and security of all employees is of primary importance at Twin Lakes Management Company. Twin Lakes Management Company is committed to providing a safe and secure workplace for employees and the public. Twin Lakes Management Company will not tolerate threats, stalking, threatening and abusive behavior, or acts of violence against employees, visitors, customers, and/or company facilities or property by anyone on company property, on a company-controlled site, or in connection with company employment of company business. This includes all of this behavior made in jest. Any violation of this workplace security policy may lead to criminal prosecution, and/or disciplinary action, up to and including termination and/or referral to appropriate law enforcement agencies for arrest and prosecution. Twin Lakes Management Company reserves the right to take any necessary legal action to protect its employees.

Prohibited Behavior

1. Employees are prohibited from engaging in or promoting acts of intimidation, violence, threats, coercion, assault and/or abusive behavior toward any person while in the course of their employment. Twin Lakes Management Company has zero tolerance for any conduct that references workplace violence, even if it was intended to be harmless, humorous, a prank, blowing off steam or venting.
2. Employees engaged in business, working on company property, or utilizing company parking lots are prohibited from carrying self-defense weapons.

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Employees must immediately report workplace violence to their supervisor or Manager. The supervisor or manager will report the matter to the Human Resources Department. Human Resources will document the incident, including the employee names(s), date/time, location, incident description, witness names and statements, description of unidentified parties, description of the act(s) and/or behavior arising from the incident, action taken, and provide any other relevant information regarding the incident.

10. DRUG AND ALCOHOL FREE WORKPLACE

Employees will be required to sign and abide by a Drug and Alcohol Free Workplace Policy. Employees are expected to come to work free from illegal substances and substances that may impair their ability to safely perform their job. Employees are required to inform their Supervisor or Human Resources if they are taking prescription medication that may impair their ability to perform their job safely. Confidentiality will be maintained and the employee need not disclose the type of medication. Should an employee need assistance with drug and/or alcohol

addiction or abuse, they can seek "Safe Harbor" by reporting it to their Supervisor or Human Resources prior to be identified through other means. Refer to the policy manual for more information on this subject.

11. EMPLOYEE DRESS AND APPEARANCE

Twin Lakes Management Company is a professional organization. Employees are responsible to present a professional appearance appropriate to their job classification in order to promote a safe working environment and a positive image to the public. You supervisor will provide you with additional information on this topic.

12. PAYDAYS

For payroll purposes, the year is divided into bi-weekly pay periods. The payday for the bi-weekly pay period will be the Friday following the close of the payroll period. Payroll will publish an annual payroll schedule at the beginning of each calendar year.

13. HOURS OF WORK

The standard workweek begins at 12:01 A.M. Sunday and ends at 12:00 A.M. (midnight) on the following Saturday. Work schedules will be posted as soon as possible to allow the employee to plan their time accordingly.

14. PAY AND OVERTIME

Payment of wages, including overtime, will be paid in accordance with the California Wage Orders. Under California Wage Orders, “overtime” is all hours a non-exempt employee actually works over forty (40) hours in his/her work week or eight (8) hours in a workday. Overtime is compensated at 1.5 times the employee’s regular rate of pay. Hours paid for hours not worked, e.g., holidays, sick days or hours and vacation, do not count toward hours worked for overtime computation purposes. Time worked will be rounded to the nearest quarter of an hour. You are expected to be at your workstation ready to work at your scheduled start time.

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Overtime-eligible employees are not permitted to work overtime except as his/her supervisor or the manager authorizes or directs. Overtime-eligible employees directed to work overtime must do so. No employee may work overtime without receiving the approval of the appropriate supervisor prior to performing the work. Working overtime without advance approval is grounds for discipline. All hours worked, including overtime hours worked within a bi-weekly pay period will be paid out at the following payday. Twin Lakes Management Company does not allow the accrual of compensatory time off in lieu of overtime payments.

Employees are allowed to “make-up” time during the same payroll week and not accrue overtime for hours worked in excess of eight (8) on a single day. In order to “make-up” time, employees must obtain permission from their supervisor and fill out a Make-up” time request form, which must be submitted to payroll during payroll close. Employees can work up to eleven (11) hours in a day without overtime, to make up for another day in the same payroll week. For example, an employee can work four (4) hours on Monday, but then work ten (10) hours on Tuesday and Wednesday to get their forty (40) hours for the week.

15. ABSENCE CONTROL POLICY

We recognize the need for employees to be absent from work due to illness or the need to take care of personal business during the normal workday. We instituted sick and vacation time off to provide for these needs as they arose. Employees also may qualify for a leave of absence for their own major illness, the major illness of a family member, pregnancy, the birth or adoption of a child, workers' compensation injury, or military and/or National Guard duty and/or care giving. Having provided for these situations, it is important to remember that excessive absenteeism, tardiness, and/or leaving early causes the burden of filling in for the absent employee to fall on other employees within the organization. It is a requirement of each job that an employee report to work punctually and work all scheduled work hours as well as any required overtime.

Employees who are not on an approved leave of absence and are absent from work as defined below will be addressed through the normal Corrective Action Process (See "Corrective Action" Policy 333).

The following corrective action steps should be taken each time this occurs:

First Incident	Record of Conversation
Second Incident	First Written Warning
Third Incident	Final Written Warning
Fourth Incident	Termination

Two (2) consecutive days of absence for the same reason are deemed to be one incident. If the employee is absent for more than two (2) consecutive days, he/she must bring a doctor's note in order for more than two (2) consecutive days of absence to be counted as one (1) incident. If at any time an employee corrects his/her excessive absence problem and has no unexcused absences during a six-month period, corrective action, if it becomes necessary again, should begin with a Record of Conversation.

If an employee who has been with the company less than ninety (90) days has an unexcused absence, he/she will be issued a Final Written Warning for that absence. If an unexcused absence occurs again within his/her first ninety (90) days of employment, the employee will be terminated. If the new employee has no further incidences during his/her first ninety (90) days of employment, the Final Written Warning will revert to a Record of Conversation.

Periodically, special circumstances will occur that warrant an employee being excused from work. To ensure fairness throughout the Company, these types of requests require the approval of the Human Resources Director.

Occasionally, an employee will exhibit a pattern of absenteeism that must be corrected despite the rules above (i.e., consistently missing a specific day of the week; the day before or after a holiday; the day before or after a scheduled vacation). Such cases should be reviewed with the Human Resources Director before issuing any corrective action, but should be addressed as soon as discovered. The company reserves the right to require a doctor's note for any absence if it is warranted.

An employee who is going to be absent, tardy, or leave early from work is responsible for notifying his/her supervisor as soon as possible, regardless of whether the employee has sufficient paid time off to cover the absence. An employee who is absent and fails to notify his/her supervisor will be subject to corrective action for failure to notify. An employee who has been absent three (3) consecutive days without calling to speak with his/her supervisor will be considered to have voluntarily resigned.

16. REST PERIODS/MEAL PERIODS

Employees will receive rest periods and meal periods in accordance with the appropriate California Wage Order. Meal periods are unpaid and will be scheduled from thirty (30) minutes to one (1) hour, at the discretion of the Supervisor. When employees take meal periods, they are required to clock in and out for such time and must track such time on Twin Lakes Management Company's timecard (electronic or paper). Employees taking a meal break must do so by the end of their 5th hour of work for the day. If an employee is going to miss the 5th hour mark, they must get pre-approval from their immediate supervisor. Employees who work six (6) hours or less may waive their meal period. In instances of workdays exceeding ten (10) hours, employees will receive a second unpaid meal break. Employees who work under twelve (12) hours may waive this second meal break.

Employees should be relieved of all duties and Twin Lakes Management Company requires that meal periods be taken away from an employee's desk, office, or assigned work space to ensure the meal period time is uninterrupted.

17. PERSONNEL FILES AND REFERENCE REQUESTS

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In order to ensure we can keep you informed of pertinent information, each employee is responsible to promptly notify the Human Resources Department of any changes in relevant personal information, including:

- Mailing address
- Telephone number
- Persons to contact in emergency

Twin Lakes Management Company will not disclose personnel information if it believes doing so would constitute an unwarranted invasion of personal privacy.

All requests from outside Twin Lakes Management Company for recommendations, references, verification of employment and other information concerning any current or former employee must be referred to the Human Resources Department. Information will be released only if the employee signs an AUTHORIZATION FOR RELEASE OF EMPLOYMENT INFORMATION form, except that without such authorization, the following limited information will be confirmed:

- Dates of employment
- Job classification

Please note that Twin Lakes Management Company **does not** draft or provide recommendation letters or letters of reference regarding current or former employees to anyone.

Memoranda written to the file as a result of corrective or disciplinary actions taken against an employee will become a part of the employee's permanent personnel record.

An employee may inspect his/her own personnel file at reasonable times and at reasonable intervals. An employee who wishes to review his/her file should contact the Human Resources Department to arrange an appointment outside of the employees scheduled work hours. Twin Lakes Management Company does not provide employees with paid leave for the purposes of reviewing their personnel file. The review must be done in the presence of an employee of the Human Resources Department. On request, an employee is entitled to receive a copy of any employment-related document he/she has signed. An employee who wishes to receive such a copy should contact the Human Resources Department.

In the event the employee wishes to have another person/representative inspect his/her personnel file, the employee must provide the person/representative with written authorization. The Human Resources Department will notify the employee of the date, time and place of the inspection in writing. It is the employee's responsibility to notify the person to whom the employee has given written authorization of the date, time and place of the inspection.

Under no circumstances may the employee and/or the employee's designee be permitted to add or remove any document or other item from the employee's personnel file during the inspection.

18. EMPLOYMENT OF RELATIVES

While the organization has no prohibition against hiring relatives of employees, close family members such as parents, children, spouses, siblings, or in-laws will not be hired into or transferred to positions where they directly or indirectly supervise or are supervised by another close family member. If two employees marry and are in the same chain of command, Twin Lakes Management Company may select either employee at its discretion and require the selected employee to transfer or leave the organization.

Twin Lakes Management Company reserves the right to determine in all cases if a close enough familial relationship exists to prohibit a supervisory relationship.

19. HOLIDAYS

All regular and probationary employees are eligible for pay on the following holidays:

New Years Day
~~Martin Luther King Jr. Day~~
Washington's Birthday
~~Veteran's Day~~
Memorial Day

Labor Day
Thanksgiving Day
Day after Thanksgiving Day
Last Working Day before Christmas Day
Christmas Day
Floating Holiday

Due to the nature of TLMC's business, we are open for our customers on several holidays. Human Resources will publish when holidays will be observed at the beginning of each calendar year so employees can plan accordingly.

An employee must have been employed by Twin Lakes Management Company and worked on the scheduled day preceding the holiday, the day of the holiday, if scheduled, and the scheduled day following a holiday to qualify for holiday pay.

20. VACATION LEAVE

Regular, full-time employees begin accruing vacation time on their first day of employment, but may not take vacation time until they have reached one (1) year of continuous employment with Twin Lakes Management Company.

0–2 years	5 days per year
3–7 years	10 days per year
8+ years	15 days per year

Employees will continue to accrue vacation time only for the first ninety (90) days the employee is on paid sick leave, any paid and unpaid leaves of absence, or when using previously accrued vacation time.

Where a paid holiday falls during the period of an employee's vacation leave, that day will not be charged against the employee's vacation accrual.

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All earned vacation leave shall be taken during the year following the year in which it is earned, except that an employee may accumulate up to two (2) times their current annual accrual rate. When the employee reaches the maximum accrual, he/she shall cease earning vacation leave until the balance falls below the maximum accrual.

Vacation schedules shall be submitted to your direct Supervisor at least two weeks in advance. Vacations shall be scheduled with due consideration given to the desires of the employee and the operational needs of Twin Lakes Management Company. The manager has full authority to accept and reject requests for vacation leave.

Any employee who resigns, retires, is laid off or otherwise terminated from employment with Twin Lakes Management Company shall be paid for his/her accumulated vacation time.

21. SICK LEAVE

Sick leave is leave from duty which may be granted by Twin Lakes Management Company to an employee because of preventive care, care of an existing health condition, or for specified purposes if you are a victim of domestic violence, sexual assault, stalking, or any other qualifying event as defined by law. Family members include the employee's parent, child, spouse, registered domestic partner, grandparent, grandchild, and sibling.

In order to apply for sick leave use, an employee shall notify the appropriate immediate supervisor within one (1) hour before the time established as the beginning of the employee's work day, unless Twin Lakes Management Company determines the employee's duties require more restrictive reporting. Failure to do so without good reason may result in that day of absence being treated as leave of absence without pay. If the employee is absent on sick leave for more than one (1) day, the employee must keep his/her supervisor informed as to the date the employee expects to return to work.

Sick leave will not be granted to any employee absent from duty after separation from employment, or during an authorized leave of absence without pay, or any other absence from duty not authorized by Twin Lakes Management Company. Sick leave will not be granted to any employee to permit an extension of the employee's vacation.
Twin Lakes Management Company may require a physician's note at any time regarding the sickness or injury of the employee or their immediate family member and the date of the employee's intended return to work.

Management has the discretion to place employees on sick leave when, in the judgment of Management, the presence of the employee at work would endanger the health and welfare of other employees or where the illness or injury of the employee interferes with the performance of such employee's duties.

Sick Leave Use
All regular employees may be granted sick leave only in case of actual sickness as defined above. In the event an employee or a member of the employee's immediate family recovers from any such sickness after being granted sick leave, and during the regularly scheduled hours of work, then such employee shall notify the appropriate immediate supervisor and be available to return to duty. Regular employees will receive six (6) days (48 hours) of sick leave each January 1st. Regular employees can accrue up to a maximum of 1,600 hours. There is no payout of sick leave hours upon the end of the employment relationship, but any unused balance will be reinstated for any employee who is rehired within one (1) year of separation.

Effective 1/1/2015, all part-time and seasonal/temporary employees who work more than thirty (30) days will receive a lump sum of three (3) days (24 hours) of sick leave per calendar year, to be used for any of the reasons noted above. Part-time and seasonal/temporary employees cannot take the leave for the first ninety (90) days of their employment. Sick hours cannot be carried over from year to year and are forfeited once the employment relationship ends. There will be no pay out of sick leave entitlements upon the end of the employment relationship, but any unused balance will be reinstated for any employee who is rehired within one (1) year of separation.

- Sick leave granted by Twin Lakes Management Company and used by an employee will be deducted from the employee's accrued sick leave balance.
- Sick leave must be used in two (2) hour increments and employees must provide reasonable advanced notice.
- Employees granted a leave of absence with pay or other approved leave with pay will accrue sick leave as provided herein.
- Sick leave will not be accrued by an employee absent from duty after separation from employment, or during an authorized leave of absence without pay, or any other absence from duty not authorized by Twin Lakes Management Company.

An employee is subject to disciplinary action for excessive use of sick leave and/or abuse of sick leave. Abuse of sick leave is a claim of entitlement to sick leave when the employee does not meet the requirements of sick leave as defined above.

22. FAMILY AND MEDICAL CARE LEAVE

Family Medical Leave Act (FMLA) – FMLA applies to employers who have fifty (50) or more employees in twenty (20) or more workweeks of the year. Employees who have worked at least one (1) year and 1,250 hours are eligible to take twelve (12) weeks off per rolling calendar year to attend to their own serious health condition, to care for a spouse, child, or parent, or because of the birth of a child, placement of an adopted/foster child.

Employees may take up to twenty-six (26) weeks off to care for a covered Servicemember who is receiving medical treatment or is temporarily disabled due to a serious injury or illness that was incurred in the line of duty.

California Family Rights Act (CFRA) – CFRA applies to employers who have fifty (50) or more employees in twenty (20) or more workweeks of the year Employees who have worked at least one (1) years and 1,250 hours are eligible to take twelve (12) weeks off per rolling calendar year to attend to their own serious health condition, to care for a qualifying family member, or due to the birth of a child, for the purposes of bonding, for adoption placement or foster care.

Pregnancy Disability Leave (PDL) – PDL applies to employers who have five (5) or more employees. Any employee who is disabled on account of pregnancy, childbirth, or related medical condition, (including prenatal care, severe morning sickness, doctored ordered bed rest, etc.) is eligible for and will be granted unpaid Pregnancy Disability Leave. PDL has a maximum of four (4) months or 88 days off and can be taken all at once or intermittently as needed.

Should an employee require a temporary transfer or accommodation due to pregnancy, please notify your Supervisor or Human Resources immediately. Twin Lakes Management Company will make every reasonable effort to accommodate the employee's needs.

24. MILITARY LEAVE

Military leave shall be granted in accordance with the provisions of state and federal law. An employee requesting leave for this purpose shall provide the Supervisor and Human Resources, whenever possible, with a copy of the military orders specifying the dates, site and purpose of the activity or mission. Within the limits of such orders, the Supervisor and Human Resources may determine when the leave is to be taken and may modify the employee's work schedule to accommodate the request for leave.

25. ADMINISTRATIVE LEAVE

Twin Lakes Management Company has the right to place an employee on leave at any time. . An employee may be placed on administrative leave pending investigation of misconduct, potential disciplinary action or other reasons the Human Resources Department, in its sole discretion, believes warrants such leave. The employee has no right to appeal if placed on paid administrative leave.

26. UNPAID LEAVES OF ABSENCE

An employee shall not be entitled to a leave of absence without pay as a matter of right (except as provided by federal or state law). Several types of unpaid leaves of absence may be available to eligible employees, depending on the reason for the leave. Employees who believe they may need to take a leave of absence for any reason are encouraged to contact the Human Resources Department to discuss their options.

Personal Leaves of Absence (Non-Medical)

Employees who have been continuously employed with Twin Lakes Management Company on a full-time basis for at least one (1) year, may, due to special circumstances, request a personal leave of absence without pay, for a reasonable period of time up to one (1) year. The request may be to undertake a course of study or for other personal reasons acceptable to Twin Lakes Management Company. These requests will be considered on the basis of length of service, performance, responsibility level, the reason for the request, whether other individuals are already out on leave and the expected impact on Twin Lakes Management Company. Requests for personal leaves of absence must be submitted on an application form available from the Human Resources Department.

Twin Lakes Management Company does not pay for employee insurance premiums during any portion of a personal leave of absence beyond the end of the month in which the leave begins. Rather, Twin Lakes Management Company will provide employees on a personal leave of absence the opportunity to continue their insurance benefits pursuant to COBRA.

Medical Leaves of Absence (MLOA)

Employees who believe they may need a leave of absence from Twin Lakes Management Company for medical reasons are encouraged to contact the Human Resources Department to discuss their options.

27. WORKERS' COMPENSATION INSURANCE

If you are unable to work because of a job-related injury or illness, Workers' Compensation provides for medical expenses and temporary income supplements. On the job injuries or

illness must be reported immediately to the appropriate Supervisor and the Human Resources Department.

28. BEREAVEMENT LEAVE

Twin Lakes Management Company recognizes the need for time away from work in instances of personal loss. Should a death occur in the immediate family of any full-time employee, he/she will be granted up to three (3) days off with pay. If employees need time in excess of three (3) days, they may request a leave of absence or use accrued vacation or personal leave time with the approval of their supervisor and the Human Resources Director.

"Immediate family" consists of the following: Employee's spouse, domestic partner, child, stepchild, parent, grandparent, grandchild, brother, sister, mother/father-in-law, son/daughter-in-law, brother/sister-in-law, legal guardian, or custodial child, or the same relatives of a domestic partner.

Payment for bereavement leave is at the employee's straight time rate of pay. Time off without pay, vacation day(s), or personal day(s) may be granted to attend the funerals of other close relatives or friends upon approval by the employee's supervisor.

To be eligible for the excused absence and pay provisions of this policy, employees are to request bereavement leave through their supervisor no later than the first scheduled workday following the death of an immediate family member.

Verification of the need for bereavement leave shall be provided by the employee to the Human Resources Department upon the employee's return to work.

29. JURY DUTY/COURT APPEARANCE REQUESTS

A. Jury Duty

All employees who are summoned to serve on a jury must notify their Manager as soon as possible after receiving notice of possible or actual jury service, and must submit a Request for Leave of Absence form to the Human Resources Department. Regular employees who are summoned to serve on a jury and who notify their Supervisors and submit a Request for Leave of Absence form to the Human Resources Department will receive paid time off for the period of actual service required on such jury. An employee on jury duty will be expected to report for work at Twin Lakes Management Company for time not actually retained on jury service of one (1) hour or more prior to and/or upon completion of each day's service, exclusive of travel time. The time spent on jury duty is not work time for the purposes of calculating overtime compensation.

B. Subpoena

An employee who is subpoenaed to appear in court in a matter regarding an event or transaction which he/she perceived or investigated in the course of his/her job duties will do so without loss of compensation. The time spent will be considered work time.

C. Exception for Employee-Initiated or Non-Company Related Lawsuits

An employee subpoenaed to appear in court in a matter unrelated to his/her job duties or because of civil or administrative proceedings that he/she initiated shall not receive compensation for time spent related to those proceedings. An employee may request to

receive time off without pay, or may use accrued vacation for time spent related to those proceedings. The time spent in these proceedings is not considered work time.

D. Exception for Grand Jury Service

An employee who applies for and is selected to serve on a grand jury shall not receive compensation for time spent related to those proceedings. An employee may request to receive time off without pay, or may use accrued vacation time for time spent related to grand jury proceedings. The time spent in grand jury proceedings is not considered work time.

30. TIME OFF TO VOTE

If a non-exempt employee does not have sufficient time outside of working hours to vote in a statewide election, the employee may take up to two (2) hours off without loss of pay at the beginning or end of the day. Prior approval of the employee's supervisor forty-eight (48) hours before the leave for this time off is required.

31. SCHOOL-RELATED LEAVE

Any employee who is a parent, guardian or grandparent having custody of one or more children in kindergarten or grades 1 through 12 or attending a licensed day care facility shall be allowed up to forty (40) hours each school year, not to exceed eight (8) hours in any calendar month of the school year, without pay, to participate in activities of the school of their child. The employee must provide reasonable advance notice of the planned absence. The employee may be required to use vacation time to cover the absence. Twin Lakes Management Company may require the employee to provide documentation from the school as verification that the employee participated in school activities on a specific date and at a particular time. If both parents, guardians or grandparents having custody work for Twin Lakes Management Company at the same work site, only the first parent requesting will be entitled to leave under this provision.

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32. TIME OFF FOR VICTIMS OF VIOLENT CRIMES OR DOMESTIC ABUSE

An employee who has been a victim of a violent crime or domestic violence may take time off to: 1) appear in court to comply with a subpoena or other court order as a witness in any judicial proceeding; 2) seek medical or psychological assistance; or 3) participate in safety planning to protect against further assaults. Please refer to the policy manual for more information on this benefit.

33. TIME CARDS

All non-exempt employees are required to complete a timecard by clocking in and out electronically or filling out a timecard, reflecting actual time worked each day. Each timecard should be reviewed and approved by the employee prior to the Supervisor approving the timecard for payroll. Falsification of time cards, or filling out another employee's time card will subject an employee to disciplinary action, up to and including termination.

34. BULLETIN BOARDS

Twin Lakes Management Company uses bulletin boards to communicate important business information such as safety rules, job openings, statutory and legal notices, company policies,

and management memos. Each employee has the responsibility to read the information that is posted. Your manager or supervisor can give you the location of the bulletin board nearest your work area. Employees may not post material on bulletin boards without the approval of Human Resources. That approval will be stamped upon any notices posted on the bulletin boards.

35. USE OF COMPANY PROPERTY AND EQUIPMENT

Company property is to be used only for conducting Company business unless otherwise authorized. Company property includes, but is not limited to: telephones, cellular telephones, desks, computers (including hardware and software), file cabinets, lockers, communications stored or transmitted on Company property (such as any electronic communications including e- and voice-mails), vehicles and any other Company property used by employees in their work. **Employees do not have a reasonable expectation of privacy in Company property or equipment.**

Company property may be monitored and searched at any time and for any reason. Messages sent or received on Company equipment including cellular telephones may be saved and reviewed by others. As a result, employees have no expectation of privacy in the messages sent or received on Company property or equipment.

Every employee is required to adhere to all Company rules and policies while on Company property or using Company property or equipment.

The following are examples of inappropriate and prohibited uses of Twin Lakes Management Company's communications systems:

a. Exposing others, either intentionally or unintentionally, to material which is offensive, obscene or in poor taste;
b. Any use that would be offensive to a reasonable person because it involves an individual's race, religion, color, sex, gender identity, sexual orientation (including heterosexuality, homosexuality and bisexuality), ethnic or national origin, ancestry, citizenship status, uniformed service member status, marital status, family relationship, pregnancy, age, medical condition (cancer or HIV/AIDS related), genetic characteristics, and physical or mental disability (whether perceived or actual);
c. Communication of confidential Company information to unauthorized individuals within or outside Twin Lakes Management Company;
d. Sending messages with content that conflicts with any Company policies, rules or other applicable laws;
e. Unauthorized attempts to access Company data or systems;
f. Theft or unauthorized copying of electronic files or data;
g. Initiating or sustaining chain letters; and
h. Intentionally misrepresenting one's identity for improper or illegal acts.

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36. CELL PHONE USE POLICY

Office telephones are a vital part of our business operation. Because of the large volume of business transacted by telephone, personal use of the telephone should be limited and personal calls should be brief. Personal long-distance calls must be billed to the employee's home phone, credit card, or placed collect.

Business long-distance telephone calls should be limited whenever possible. When the employee is traveling, it is permissible to make a brief call home every other evening.

Cell phones are furnished to certain employees in connection with their duties. Employees who are issued cell phones by Twin Lakes Management Company should make all long-distance telephone calls while traveling from their cell phone. Employees need to limit personal use of cell phones in the same way they need to limit personal use of their office telephone. Employees that have excessive cell usage for personal calls will be subject to corrective action up to and including termination.

Twin Lakes Management Company requires the safe use of its cell phones by employees while conducting business. Employees should not use the cell phones while driving because of safety concerns, but should instead pull to the side of the road to make receive telephone calls, read emails or send/receive texts. If unable to pull over or stop prior to receiving a cell phone call, employees should utilize a hands-free device for increased safety, keep the business conversation brief, and immediately locate a safe area to park. Twin Lakes Management Company does not permit employees to drive while using a hand-held cell phone.

During work time, employees should limit the use of their personal cell phones. Employees should set personal cell phones on the silent ring mode during work hours to avoid disturbing those working around them.

Regardless of whether a cell phone is company-issued or personal in nature, employees should never use any type of photographic feature on their cell phones to take pictures on company premises, while conducting company business, or at company-sponsored functions without receiving written permission from management to do so.

37. USE OF COMPANY VEHICLES

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Only the Chief Operating Officer permanently assigns a Company vehicle to an employee. However, a Manager may make temporary assignments when it is in the best interest of Twin Lakes Management Company.

Permanently assigned vehicles are not to be used for personal purposes except for commuting to and from work and incidental personal use, such as a stop for a personal errand between work and home.

Only employees may operate Company vehicles, except in the case of an emergency. It is the responsibility of the employee to become familiar with the safe operation of individual company vehicles including a review of the corresponding operation manual provided by the vehicle manufacturer. Non-employee passengers are only permitted when their presence is to the benefit of Twin Lakes Management Company's business, (i.e. visiting officials from other companies, Advisory Board members, sales representatives, etc.). Spouses are approved passengers when they accompany employees on Company-sponsored trips. UNDER NO CIRCUMSTANCES ARE HITCHHIKERS ALLOWED.

When an employee is responsible for a Company vehicle, whether it is a permanently assigned vehicle, an office pool vehicle, a temporary assignment or daily working usage, he/she is responsible for the following:

- Vehicle upkeep: regular maintenance or problems should be brought to the attention of the Shop Superintendent.
- Safety of passengers (seatbelt usage is mandatory).
- Properly recording entries on gas logs, etc.
- Exercising care and common sense in driving habits and observation of all laws.
- Proper use of Company forms when circumstances require, including submitting incident reports or accident reports as soon as possible.

There is no smoking permitted in Company vehicles. Failure to utilize an assigned vehicle in an appropriate manner could result in loss of that privilege and disciplinary action up to and including termination.

Use of a Company vehicle for commuting purposes is a taxable fringe benefit. Twin Lakes Management Company will notify employees who have been assigned a vehicle on a permanent basis of the taxation valuation method that is currently in use at Twin Lakes Management Company.

38. USE OF PERSONAL VEHICLES

Upon approval of the appropriate Manager, personal vehicles may be used for Company business under the following circumstances:

- A Company vehicle is not available or would not be suitable for the trip involved; or
- Use of a Company vehicle would be for such a length of time that it would create a hardship for Twin Lakes Management Company.

Request for reimbursement for mileage should be made on the Twin Lakes Management Company Expense Statement, signed by the employee, approved by the Manager and forwarded to the Chief Operating Officer. The mileage reimbursement rate to operate privately owned vehicles is the allowable IRS rate in effect at the time the expense is incurred. The mileage distance should be calculated from the employee's home or Twin Lakes Management Company office involved, whichever is shorter.

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39. TOBACCO USE

Twin Lakes Management Company strives to provide a comfortable environment for our patrons and employees. Thus, the use of tobacco products including but not limited to cigarettes, cigars, pipes, chewing tobacco and smokeless tobacco is prohibited inside any of the organization's facilities or vehicles. The use of tobacco products will be allowed in company-designated areas outside any facility. Appropriate signage will be placed at entrances to all buildings advising employees and visitors that Twin Lakes Management Company maintains a tobacco-free environment. The management of each facility will designate areas outside the building where the use of tobacco products will be allowed. This policy relates to all work areas at all times, including before and after normal working hours.

Employees are to confine the use of tobacco products, including but not limited to cigarettes, cigars, pipes, chewing tobacco and smokeless tobacco, to designated smoking areas only. Appropriate signage will be placed in these designated areas advising employees and visitors that tobacco usage is permitted only in these areas. This policy relates to all work areas at all times, including before and after normal working hours.

40. ANNUAL PERFORMANCE EVALUATIONS

Supervisors are authorized to evaluate a subordinate's performance as often as the supervisor deems appropriate. Employee performance will be evaluated at least one (1) time each year.

41. PROMOTIONS AND VOLUNTARY TRANSFERS

Vacancies and/or new job opportunities for all positions will be posted on employee bulletin boards and the company website for a period of seven (7) calendar days. All employees shall be eligible to apply for all such vacancies and/or new job opportunities.

42. PERSONAL CONDUCT

Twin Lakes Management Company expects all employees to observe certain standards of behavior while at work and at company-sponsored events. Employees shall be responsible for ensuring that the conduct of any of their guests at a company-sponsored function is respectful and not offensive to anyone in attendance. These standards are not intended to restrict employees, but to ensure a consistent application of the policies and procedures for all employees.

These standards include, but are not limited to

- Completing all documents and records accurately;
- Refraining from altering and/or destroying any documents or records without proper authorization;
- Maintaining satisfactory attendance and punctuality;
- Performing duties and operating equipment with care to protect the safety of employees, coworkers, and the public;
- Carrying out assigned duties and following reasonable instructions or requests from supervisors and/or management;
- Not posting any literature, handbills, petitions, posters, or other materials on the premises without the prior approval of Human Resources;
- Refraining from soliciting funds or selling any item, commodity, or service;
- Not possessing weapons on the premises;
- Refraining from any manner or form of discrimination and/or harassment, regardless of whether it is sexual, racial, religious, or related to another's gender, age, sexual orientation or disability;
- Using company property or that of another employee in an inappropriate manner;
- Failing to obtain written authorization to remove company property from the premises;
- Refraining from misuse, theft, or destruction of company time and/or property or another employee's property;
- Remaining in the employee's work area, on the job, and awake during working hours;

- Reporting to work fit for duty and not under the influence of alcohol and/or drugs and refraining from using, selling, or possessing illegal drugs on company premises or while on company business. While working, employees should only possess and take drugs that are medically authorized, approved, and determined by the employee, the employee's physician, and the organization not to impair job performance or cause a safety hazard. Employees are responsible for notifying their supervisors that they are taking prescription medication if it would affect their performance on the job;
- Passing a mandatory drug and/or alcohol test or not refusing to take a drug and/or alcohol test;
- Refraining from fighting, threatening, intimidating, or coercing fellow employees and/or customers during working hours or at company-sponsored functions;
- Refraining from the use of foul or offensive language;
- Disclosing or using confidential or proprietary information only with proper authorization;
- Using company telephones for company purposes only and not for personal business other than emergency local calls;
- Failing to obtain or maintain a current license, certification, or other qualification required by law or Twin Lakes Management Company as a condition of continued employment;
- Engaging in conduct unbecoming an employee of Twin Lakes Management Company and/or conduct that appears to reflect badly upon the organization;
- Not being convicted of a felony; and
- Participating in any action that would in any way interfere with or disturb the normal operation of the organization or that would interfere with the ability of management to manage.

Failure to observe the above standards could lead to corrective action up to and including termination.

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43. CORRECTIVE ACTION

When it becomes necessary to address an employee's actions in the workplace, general guidelines of acceptable business conduct will govern. Depending upon the nature and seriousness of the employee's actions, corrective action may begin at any step of the corrective action process. The process should ensure that employees are informed of exactly what behavior needs to be corrected, inform employees of the measures they must take to correct unacceptable behavior, and give employees adequate opportunity to correct the situation.

Corrective Action Steps

Step One: Record of Conversation

The immediate supervisor of the employee will meet with the employee and inform him/her of the specific behavior that is unacceptable. The behavior will be clearly identified and a time by which the situation must be rectified is set. A written record of this conversation should be forwarded to the Human Resources Department to be placed in the employee's personnel file.

Step Two: First Written Notice

The same procedure as the Record of Conversation will be followed, except the employee is asked to sign the written record indicating he/she has read the document. The employee may wish to write his/her own comments on the notice or attach comments to that document.

Step Three: Final Written Notice
The same procedure as the First Written Notice will be followed. The Final Written Notice must specify that the consequences of failure to remedy the behavior will be termination of employment. In conjunction with issuing an employee a Final Written Notice, a supervisor also may grant an employee a one-day paid Decision-Making Leave of Absence in order to impress upon the employee the seriousness of his/her situation. A Decision-Making Leave of Absence must be documented in the Final Written Notice and approved by Human Resources. Employees will be permitted only one Decision-Making Leave of Absence during their employment with Twin Lakes Management Company.

Step Four: Termination
An employee who does not correct his/her behavior after three warnings will be terminated if the behavior continues. If six months have elapsed since the employee received corrective action, the Corrective Action Process begins at Step One (Record of Conversation). In cases involving more serious problems or violations of company policy, the process may be accelerated. All documentation may be considered to establish an overall conduct record. **Any acceleration must be reviewed with Human Resources Director prior to it taking place.**

On rare occasions, an employee may be terminated for a single occurrence of behavior or violation of policy without having been previously warned. Such action may be justified because the offense is so severe as to make a warning unnecessary – that any employee normally would know that such behavior is unacceptable. I

Any new employee will be in his/her introductory period for the first ninety (90) days of his/her employment. If corrective action needs to be taken during the introductory period, the employee will be issued a Final Written Notice that clearly states any additional occurrence of unacceptable behavior within the ninety (90) day introductory period will result in termination. The new employee will be asked to sign the document indicating that he/she has read the notice.

44. OPEN DOOR POLICY

Twin Lakes Management Company encourages employees to raise their work-related concerns with their immediate supervisors or with any supervisor or manager of their choice. Twin Lakes Management Company will attempt to keep all such expressions of concern, any investigation, and the terms of their resolution confidential, recognizing, however, that in the course of investigating and resolving the concerns, some dissemination of information to others may be appropriate and necessary.

You are encouraged to raise work-related concerns with your immediate supervisor as soon as possible after the event that causes the concerns. Alternately, if you believe your immediate supervisor is not the appropriate person with whom to raise the concern, you may raise it with

any supervisor or Manager of your choice. You are encouraged to pursue discussion of your work-related concerns with the supervisors of your choice until the matter is full resolved. You are discouraged from pursuing discussions of your work-related concerns with individual co-workers. It may not always be possible to achieve the results you want, but if not, Twin Lakes Management Company will attempt in each case to explain why. Twin Lakes Management Company believes employee concerns are best addressed through informal and open communication. If an employee elects to use these available channels of communication, he/she will not be disciplined or otherwise penalized by the immediate supervisor or by any other level of management for raising a good-faith concern.

Employees are also encouraged to raise any concerns regarding ethical misconduct by any employee or group of employees to their own or any other supervisor or Manager. These concerns regarding employee ethical misconduct may involve: interactions with customers, vendors, colleagues or other members of the community; business dealings; inappropriate use of Company funds or assets for personal gain; failure to adhere to local, state or national laws; or any other area of concern.

45. MEDICAL INSURANCE BENEFITS

Twin Lakes Management Company provides medical insurance benefits to its regular, full-time employees. For more information regarding medical insurance benefits, please contact the Human Resources Department. New hires will be informed if they are eligible to receive medical insurance benefits through the Company.

46. EMPLOYEE DEVELOPMENT

Self Initiated Employee Development

Twin Lakes Management Company maintains an Employee Development policy, applicable to regular employees, under which such employees may elect to continue their education. An employee shall be reimbursed for **one-half** the cost of tuition and/or fees and books when he/she has completed a course of study which is directly related to a present job classification, or when the course of study is directly related to a higher Company position he/she aspires to be promoted to.

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Twin Lakes Management Company reserves the right to condition tuition reimbursement upon an employee's agreement to reimburse Twin Lakes Management Company for tuition payments in the event the employee leaves Twin Lakes Management Company within a specified period of time after receiving the tuition reimbursement. However, Twin Lakes Management Company's reimbursement of an employee's tuition in no way guarantees or implies that the employee will receive preferential treatment with regard to future promotions or transfers with Twin Lakes Management Company.

Procedures and Conditions

- Reimbursement may include tuition, registration, textbooks, laboratory fees and mandatory parking fees.
- Courses must be taken on the employee's own time.

- Courses must be approved in advance by the Human Resources Department and must be satisfactorily completed before reimbursement will be made (no less than a C or the equivalent).
- The course content must have some direct relationship to the work of Twin Lakes Management Company. It may be either general or specific, but should improve the quality of the employee's work output or performance.
- The courses must be given by an accredited institution or trade/technical school.
- It shall be the responsibility of the employee to initiate the request for reimbursement in sufficient time to receive the necessary approval prior to enrollment.
- Claims for payment to the employee shall be made upon certification to Twin Lakes Management Company that the approved training has been satisfactorily completed.

Company Initiated Employee Development

Twin Lakes Management Company reserves the right to condition continued employment on participation and completion of specific employee development and/or certification courses. Twin Lakes Management Company will provide Company paid Company time and cover the full cost of any company required employee development including travel, parking, lodging, course fees and certification fees.

47. CONFIDENTIALITY

All employees are required to sign and abide by one or more Confidentiality Agreements, depending on their position. If you have any questions or would like a copy of the Confidentiality Agreement(s) you signed, please contact Management or the Human Resources Department.

48. RELEASE OF COMPANY INFORMATION

Records and/or Documents (Including Personnel Records and Reference Requests)

All such requests for records and/or documents **must** be referred to the Human Resources Department, who will determine which records and/or documents must be released, if any.

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News, Feature and Photo Releases

All Twin Lakes Management Company releases of news, special feature articles and photographs to newspapers, magazines or other publications and/or radio and television stations must have the approval of the Chief Operating Officer or his/her designated representative.

Public Appearances

From time to time, an employee may be invited to participate in public activities on behalf of Twin Lakes Management Company. No form of honorarium may be accepted for these events. Public appearances or comment solicited of our employees by outside agencies, organizations and the media require the permission of the Chief Operating Officer.

49. SOLICITING ON COMPANY PREMISES

No employee shall solicit or promote support for any cause or organization during his/her working time or during the working time of the employee or employees at whom such activity is

directed. No employee shall distribute or circulate any written or printed material in work areas at any time, or during his/her working time or during the working time of the employee or employees at whom such activity is directed.

Non-employees may not distribute materials or solicit employees on Company premises at any time unless approved by the Human Resources Department.

50. CONFLICT OF INTEREST/DEVOTION TO FULL TIME EMPLOYMENT

Employees are expected to devote their full time, attention, and efforts to their work during hours of duty as employees. An employee shall not engage in any employment, activity or enterprise which is clearly inconsistent, incompatible, in conflict with, or inimical to his/her duties as an employee. Employees are not permitted to participate in the following activities during or outside of working hours:

1. Activities involving the use, for private gain or advantage, of Company time, facilities, equipment, and supplies, or the employee's ID badge, uniform, prestige or influence of one's Company office or employment.
2. Activities involving receipt or acceptance by the employee of any money or other consideration from anyone other than Twin Lakes Management Company for the performance of an act which the employee, if not performing such act, would be required or expected to render in the regular course of his/her employment or as a part of his/her duties as an employee;
3. Activities involving the performance of an act in other than his/her capacity as an employee, which act may later be subject directly or indirectly to the control, inspection, review, audit or enforcement by such employee or the department by which the employee is employed;
4. Activities involving conditions or factors which would probably, directly or indirectly, lessen the efficiency of the employee in his/her regular employment or conditions in which there is a substantial danger of injury or illness to the employee;
5. Activities involving use or access to confidential information available by virtue of employment for private gain or advantage, or providing confidential information to persons to whom issuance of this information has not been authorized; or

6. Use of Company-owned equipment, autos, trucks, instruments, tools, supplies, machines, or any other item which is the property of Twin Lakes Management Company in conjunction with outside employment or any activity for compensation. In addition, no employee shall allow any unauthorized person to rent, borrow or use any of the items discussed above.

Any violations of this policy respecting outside employment or activity and use of Company property shall constitute sufficient grounds for disciplinary action, up to and including termination.

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51. ELECTRONIC MEDIA POLICY

Electronic communications including but not limited to internet, email and voicemail access is provided by Twin Lakes Management Company for business use. Incidental personal use should not interfere or conflict with business use or job performance. All electronic communications must be used in compliance with applicable statutes, regulations and Company policies including those that require a work environment free from discrimination and harassment. Employees do not have a reasonable expectation of privacy in their use of the internet, email or voicemail provided by Twin Lakes Management Company. Employees are expected to use common sense and judgment to avoid any communication which is disrespectful, offensive or illegal. Offensive and vulgar material on any Company property will not be tolerated.

Twin Lakes Management Company, as provider of access to the internet, email and voicemail, reserves the right to specify how Twin Lakes Management Company's network resources will be used and administered to comply with this policy. It is important to realize that the content of a message sent from a Company account reflects either positively or negatively upon Twin Lakes Management Company. Employees may be subject to disciplinary action up to and including termination for using these resources in a manner other than for their intended purposes.

The information sources accessible via the internet are worldwide and constantly growing in kind and number making it impossible for any internet access provider to fully manage the types of information accessible by its systems and users. Nonetheless, Twin Lakes Management Company reserves the right to restrict access to any data source if/when, in its sole discretion and after appropriate review; Twin Lakes Management Company determines such a source to be problematic. These restrictions do not constitute an implication of approval of other non-restricted sources.

Without exhausting all the possibilities, the following are examples of inappropriate use of the internet, email and voicemail:

- Exposing others unwillingly, either through carelessness or intention, to material which is offensive, obscene or in poor taste. This includes information which could create an intimidating, offensive or hostile work environment;

- Any use that may, for a reasonable person, create or further a hostile attitude or give offense on the basis of race, color, religion, national origin, citizenship, ancestry, marital status, gender, disability, age, veteran's status, sexual orientation or gender identity;

- Communication of confidential Company information to unauthorized individuals within or outside of Twin Lakes Management Company;

- Sending messages or information which is in conflict with applicable law or Company policies, rules or procedures;

- Unauthorized attempts to access data or break into any Company or non-Company system;

- Allowing another individual to use your log-in I.D. or password. Sharing of log-in I.D.s or passwords is strictly prohibited;

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- Theft or unauthorized copying of electronic files or data; or

- Initiating or sustaining chain letters.

- Intentional misrepresentation of one's identity for improper or illegal acts.

Twin Lakes Management Company reserves the right to monitor computer use, to access email, and to access stored files. Under some circumstances, communications may be subject to disclosure in litigation. Note that deletion of messages or files may not fully eliminate a message from the system.

E-mail messages to recipients on systems outside Twin Lakes Management Company may pass through systems and networks not managed by Twin Lakes Management Company. The privacy and confidentiality of these messages is, therefore, not assured for that reason as well. In addition, some delivery methods and networks impose legal restrictions regarding the nature of messages allowed. Users are expected to comply with all such regulations. Employees and other users of the internet, email and voicemail can create criminal and civil liability for themselves and Twin Lakes Management Company by using those systems in an offensive, defamatory or illegal manner, and in such event, employees and other users may be subject to disciplinary action up to and including termination.

Employees and other users of the internet, email and voicemail are advised that Twin Lakes Management Company will from time to time monitor system activities. In that regard, Twin Lakes Management Company may conduct reviews of the content of messages and files, and websites visited on the internet, including random reviews, when in the exercise of its business judgment, Twin Lakes Management Company determines it would be prudent to do so.

Any employee who feels that he/she has been the recipient or witness of unprofessional or harassing electronic communications, or who discovers a violation of this policy, is encouraged to immediately bring the subject to the attention of his/her Supervisor or the Human Resources Department.

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52. VISITORS

Except in cases of emergency, employees may not receive personal visitors during working hours. Visitors must be escorted at all times when on the TLMC premises.

53. LEAVING TWIN LAKES MANAGEMENT COMPANY

A. Job Abandonment

An employee is deemed to have resigned if the employee is absent for three (3) consecutive work days without prior authorization and without notification during the period of the absence. An employee separated for job abandonment will be reinstated upon proof of justification for such absence, such as severe accident, severe illness, false arrest or mental or physical impairment which prevented notification. Employees do not have the right to an appeal for separation due to job abandonment.

B. Retirement

It is expected that employees who plan to retire will provide Twin Lakes Management Company with at least ninety (90) days' advance written notice.

C. Resignation

When you decide to leave for any reason, the Human Resources Department and your Manager would like an opportunity to discuss the resignation with you before final action is taken. In the event you plan to resign, Twin Lakes Management Company would appreciate receiving a written two (2) week advance notice.

D. Termination

At-will employees may be terminated at any time, with or without cause, and with or without notice, at the option of either Twin Lakes Management Company or the employee. This policy cannot be amended, modified or altered in any way by verbal statements or in any other way, and can only be altered by written amendment signed by the President of Twin Lakes Management Company.

E. Benefits

Medical, Dental, Vision and Life Insurance benefits require "active" employment and, therefore, end on the last day of the last month of your employment unless otherwise specified. Refer to your coverage summary for additional information on health and term life insurance for you and your dependents.

F. On occasion, employees are hired who have previously been employed by Twin Lakes Management Company. Each time an employee is rehired by Twin Lakes Management Company, they will be given a new date of hire and seniority date. Under no circumstances will an employee be allowed to reinstate their previous service dates.

G. Final Paycheck

You will receive your final paycheck in accordance with state and federal laws. Unused vacation leave will be calculated and paid in accordance with approved Company policies.

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