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**Pilot Catastrophe Services, Inc.**

**Corporate  
Employee Handbook**



Effective: January 1, 2019

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<b>INTENT AND SCOPE OF THIS HANDBOOK .....</b>	<b>3</b>
INTRODUCTION.....	3
<i>History</i> .....	3
<i>Mission</i> .....	4
<i>Values</i> .....	4
<i>Vision</i> .....	4
<b>EMPLOYMENT.....</b>	<b>4</b>
EQUAL EMPLOYMENT OPPORTUNITY .....	4
EMPLOYMENT POLICY.....	5
EMPLOYMENT ELIGIBILITY .....	5
PERSONAL RELATIONSHIPS .....	5
INTRODUCTORY PERIOD.....	5
WORK HOURS .....	5
ATTENDANCE AND PUNCTUALITY .....	6
PAID TIME OFF.....	6
BEREAVEMENT LEAVE .....	7
MILITARY LEAVES OF ABSENCE/RESERVE DUTY.....	7
LEAVES OF ABSENCE (LOA) .....	7
<b>BENEFITS AND INSURANCE PROGRAMS .....</b>	<b>9</b>
WORKERS' COMPENSATION .....	9
SAVINGS AND INVESTMENT PLAN .....	9
HEALTH/DENTAL/LIFE PLAN .....	9
DISABILITY/LIFE PLAN.....	10
CAFETERIA PLAN .....	10
DIRECT DEPOSIT .....	10
CREDIT UNION .....	10
<b>EMPLOYEE RELATIONS.....</b>	<b>10</b>
PERFORMANCE AND CONDUCT.....	10
CORRECTIVE ACTION .....	11
PROBLEM RESOLUTION .....	11
HARASSMENT .....	11
DRUG FREE WORKPLACE .....	12
<b>WORK ENVIRONMENT/MISCELLANEOUS .....</b>	<b>13</b>
DRESS CODE.....	13
<i>GENERAL APPEARANCE</i> .....	13
<i>BUSINESS ATTIRE</i> .....	14
<i>FEMALE EMPLOYEES</i> .....	14
<i>MALE EMPLOYEES</i> .....	14
<i>EMPLOYEE GROOMING</i> .....	15
<i>SPECIAL EXCEPTIONS</i> .....	15
<i>MONITORING AND ENFORCEMENT</i> .....	15
ELECTRONIC COMMUNICATIONS .....	15
CONFLICT OF INTEREST .....	16
LICENSING/CERTIFICATION .....	17
DISCLOSURE OF CONFIDENTIAL COMPANY INFORMATION.....	17
PERSONAL IDENTIFIABLE INFORMATION (PII).....	17
NON-DISPARAGEMENT .....	18

## ***Intent and Scope of this Handbook***

This Employee Handbook has been designed to acquaint you with Pilot Catastrophe Services, Inc. (Pilot). It is intended to help you understand what Pilot expects of you and what you can expect from the company during your employment. It contains a brief overview of the policies, procedures, and benefits of the company as they relate to your employment, and should be used as a reference guide only, in conjunction with the specific policies and procedures. Complete copies of all policies are available in each department.

The policies and benefits outlined in this Handbook may apply to you depending on your particular circumstances. Specific policies and benefits programs are outlined in Pilot's Corporate Human Resource Policy Manuals and in Benefit Summary Plan Descriptions. Where the company's policies differ from state employment law, state law shall prevail. Please ask your supervisor or Human Resources if you have any questions.

Pilot reserves the right to amend or change policies, procedures, or benefits at any time. Where possible, employees will be notified in advance of any changes.

**This Handbook is not intended to create an employment contract or term of employment. Employment with Pilot Catastrophe Services, Inc. is "at will".**

## ***Introduction***

### ***History***

The Pilots are a family born into the business of managing property losses. In the 1950's, the late Walter D. Pilot, Sr. recognized our society's growing dependence on insurance against natural hazards. In 1983, he formed Pilot and Associates, Inc. to manage claims generated by catastrophic events.

Immediately, insurers connected with Pilot's sense of duty, honor and loyalty. Mr. Pilot's business associates became a part of his life, his extended family. His complete accessibility and immediate response to his "family's" needs anytime of the day or night are a quality and a service on which our corporate culture is based.

When you choose Pilot's loss adjustment services or employment with Pilot, you choose excellent professional care on a refreshingly personal level. During the trying times and unnatural circumstances surrounding natural disasters, Pilot's reassuring hand is there with the skill and compassion necessary to see that each insurer's obligation to each policyholder is fulfilled.

## **Mission**

- We are resolute in our determination to provide the most comprehensive, qualified and respected insurance claim management services in the world.
- We design and customize our services for growth and flexibility to accommodate the diverse needs of our clients in honoring their commitments to absolute customer satisfaction.
- We endeavor to establish long-term partnerships with our clients to maximize the value of mutual knowledge and forethought in coordinating rapid recovery responses to the unique conditions presented by every loss situation.

## **Values**

- Quality
- Honesty and Integrity
- Innovation and Improvement
- Respect and Dignity
- Teamwork

## **Vision**

Our company originated as a family business, and the intrinsic values that stabilize family life have worked well in our business. Pilot nurtures long-term partnerships with adjusters, insurance carriers, and emergency management agencies. From this culture, we have established the most knowledgeable, trusted and reliable claims processing operation in the U.S. and Canada.

## **Employment**

### ***Equal Employment Opportunity***

Pilot applies fair and lawful human resources policies and practices in all aspects of employment, including: recruiting, hiring, evaluation, training, discipline, career development, compensation, promotion, and separation. Equal opportunity will be provided regardless of race, religion, color, ethnic or national origin, age, gender, sexual orientation, disability, marital status, or veteran status.

As a leader in the catastrophe services industry, Pilot is committed to hiring qualified employees consistent with job requirements, and to treating all employees and applicants fairly. We all share the responsibility of meeting the company's goals for equal employment opportunity.

Employment decisions are based solely on the qualifications and abilities necessary to perform a specific job and on the employee's potential within the company. An employee who feels that he or she has been

discriminated against should report the event to his or her supervisor, manager or Human Resources. (Refer to Policy HR 150 for more details)

### ***Employment Policy***

Satisfactory work/school references, and verification of applicable license/certification will be required of candidates being considered for employment. Background checks are required at time of hire and every three years thereafter. Proof of citizenship or authorization to work in the United States will be required of all employees.

### ***Employment Eligibility***

Pilot must comply with the provisions of the Immigration Reform and Control Act of 1986 by examining documents that prove that applicants have the right to work in the United States. All newly hired employees must have a completed Form I-9 with supporting documents on file after the employment offer is made and within 72 hours from the date of actual employment. Proof of minimum age (19 or older) is also required, and other documents or credentials may be required for a particular position.

### ***Personal Relationships***

Consenting romantic and sexual relationships between a supervisor and a subordinate are generally considered very unwise. The respect and trust accorded a supervisor by a subordinate, as well as the power exercised by that person in evaluating or otherwise supervising the subordinate greatly diminish the subordinate's actual freedom of choice.

Such relationships between an employee of Pilot and an employee of a Pilot client are also generally considered very unwise in that they lead to impairment of independence of judgment and can influence decisions and actions concerning Pilot business. (Refer to Policy HR 250 for more details)

### ***Introductory Period***

Your first 90 calendar days of employment are an opportunity for you to become familiar with your new position, and with Pilot; and for your supervisor to evaluate your job skills and abilities. Near the end of your introductory employment period, your supervisor will conduct a formal review of your performance.

Continued employment with Pilot is at will and is based on many factors. Therefore, successful completion of the 90-day introductory employment period does not guarantee permanent or continued employment. (Refer to Policy HRC 125 for more details)

### ***Work Hours***

Your work hours, lunch periods, and breaks will be set by your supervisor along with your input. Lunch periods will be scheduled at a time that is convenient for you and your department.

## ***Attendance and Punctuality***

The efficient operation of our company depends upon each of us fulfilling our share of responsibility. When you are not at work, productivity is interrupted and everyone is affected.

If you are unable to report to work for any reason, the following steps should be taken:

Personally notify your supervisor that you will be absent and why, within the time frames established by your work site.

Call in each day that you will be absent from work, unless arrangements have been made regarding your date of return. If you are absent for two consecutive workdays without calling in, on the third day you will be considered to have voluntarily resigned from the company, and your employment may be terminated. (Refer to Policy HRC 325 for more details)

## ***Paid Time Off***

Pilot understands the importance of time away from work for your general health and well being. The Paid Time Off (PTO) program allows you to receive paid time off based on individual preferences and varying needs. It may be used for vacation, holiday, short-term sick time, and personal time.

Regular full-time employees scheduled to work 32 hours or more per week are eligible for PTO. ERU (Emergency Response Unit) employees are NOT eligible for PTO. PTO hours accrue at a set rate per pay period. Your accrual rate depends on your length of service. Accrual rates increase with length of service at specified intervals. There is a cap maximum that limits the amount of PTO that may be accrued on an ongoing basis.

A minimum of 90 days must be worked before you begin to accrue PTO. Employees may borrow against future hours in order to be paid for holidays during this 90 day waiting period. PTO is paid out at your base hourly rate and does not include overtime, shift differentials, on-call pay or any other type of additional pay.

Upon completion of the first 90 days, PTO may be requested and scheduled at any time during the year. Approval of requests will be based on the timeliness of your request, authorization by the appropriate supervisor, and the needs of Pilot.

Pilot corporate offices close on the following holidays, unless otherwise announced or are required to remain open due to business needs:

New Year's Day

Memorial Day

Independence Day

Labor Day

Thanksgiving Day

## Christmas Day

When a holiday falls on a Saturday or Sunday, the company may observe it on the weekday closest to it. (Refer to Policy HRC 610 for more details)

### ***Bereavement Leave***

To ease the financial hardship of missing work due to a death in the immediate family, Pilot will pay employees for time out of work. This time is paid separate from PTO. Under normal circumstances, an employee who has a death in the immediate family will be granted up to three scheduled days not to exceed 24 hours paid leave of absence. "Immediate family" includes: spouse, child, parent, guardian, brother, sister, father-in-law, mother-in-law, brother-in-law, sister-in-law, grandparents or grandchildren of you or your spouse, step-parents, step-children, or any dependent. An additional day may be granted if you must travel outside the country.

Time off without pay or scheduled vacation may be arranged with a supervisor to attend the funeral of other relatives, close friends, or other significant relationships. (Refer to Policy HRC 635 for more details)

### ***Military Leaves of Absence/Reserve Duty***

The company will grant Military Leaves of Absence based on federal law that governs the terms of such leaves.

If you are a member of a Military Reserve or National Guard unit, you will be granted a leave of absence to attend annual training camp. Pilot will reimburse the difference between your reserve pay and your regular pay for a maximum of two weeks of required duty.

If you are called to active military duty or voluntarily enlist, you will be paid a salary differential for up to 180 days. You are guaranteed re-employment in your same job or an equivalent position for up to five years from the start of your active duty period. (Refer to Policy HRC 675 for more details)

### ***Leaves of Absence (LOA)***

Pilot recognizes that circumstances may arise requiring an employee to temporarily leave his or her job for an extended period of time without ending employment. A leave of absence continues the employee-employer relationship between you and Pilot, for up to six months, provided you have completed the designated waiting period. Generally, total time away for any type of leave may not exceed 6 months. Exceptions should be discussed with Human Resources.

All LOA's may be paid or unpaid. A paid leave of absence may be from one of several sources depending on the circumstances (Vacation, Sick Time, STD, LTD or Worker's Compensation).

Types of Leaves:

## **Family and Medical Leave Act of 1993 (FMLA)**

Under the Family and Medical Leave Act of 1993, eligible employees may take up to 12 weeks of leave for the following reasons:

- to care for a child after birth, adoption, or foster care;
- to care for a spouse, child, or your own parent with a serious health condition; or
- for a serious health condition that makes you unable to perform your job.

You are eligible for an FMLA leave if you have worked for Pilot for at least one year, and have worked at least 1,250 hours in the previous 12 months. The Family and Medical Leave Act apply to individual or multiple locations within the Company where there are 50 or more employees within a 75-mile area. You may continue your health insurance during your leave as long as you pay your portion of the premium. Most employees will return to their original or equivalent positions with similar pay and benefits at the end of the leave, provided such a position exists.

Contact Human Resources for more information about the Family and Medical Leave Act. (Refer to Policy HR 650 for more details)

### **Medical Leave of Absence**

Medical leave of absence provides time off up to a maximum of 180 days if you are not eligible for FMLA leave or to supplement FMLA leave. Due to changing business circumstances, Pilot cannot guarantee you will return to your former or an equivalent position when you are ready to return from a leave.

If you use accrued vacation and sick days during a medical leave, you will remain on payroll, and the company will continue to deduct for, and to contribute to, your benefits. While on an unpaid medical leave, all of your insurance benefits remain in effect as long as you continue to pay your share of benefit costs directly to the company. If you do so, Pilot will contribute its share of benefit costs to your health, dental, and life insurance for up to the full 180 days of your medical leave.

If you choose not to continue your benefits coverage during a medical leave of absence, you may resume participation in health and dental plans upon returning to full-time employment if you still meet eligibility requirements. If you drop or become ineligible for disability insurance coverage, you must provide proof of insurability upon returning to work if you wish to resume coverage. (Refer to Policy HR 660 for more details)

### **Personal Leave of Absence**

A personal leave of absence may be approved if the reason is sufficiently important and the leave will not create a hardship for Pilot. Personal leaves

are usually approved for one month or less, and are unpaid unless you choose to use accrued, unused vacation.

If you wish to continue benefits while on an unpaid personal leave of absence, you must pay 100% of the premiums. However, you may not continue disability insurance coverage. The approval of a personal leave does not guarantee job reinstatement when the leave ends. You should confirm your return date by contacting your supervisor at least two weeks before you intend to return to work. If your position is no longer available, the company will make an effort to place you in a position similar in pay and status to the position you held prior to the leave. (Refer to Policy HR 670 for more details)

## **Benefits and Insurance Programs**

### ***Workers' Compensation***

It is Pilot policy to comply with all state laws and to aid any employee whose injury is determined to be compensable under the workers compensation laws of the state of Alabama. Pilot pays the cost of this coverage, and Pilot's workers compensation insurance carrier will make all payments and decisions pertaining to compensable illnesses or injuries.

Any employee who incurs a job related illness or injury is required to report the incident immediately to his/her supervisor. If the employee is unable to do so, the employee is required to find someone else to report the illness or injury. It is imperative that reporting is done immediately. Pilot maintains a dedicated toll-free workers' compensation line that is monitored 24-hours a day, 7-days a week. The toll-free number is 1-800-932-0911. When at all possible, employees are required to use a network physician authorized by Pilot's workers' compensation insurance carrier for medical treatment. Information, including location and telephone numbers, on network physicians can be obtained by calling the aforementioned toll free number, or 1-888-544-5500. (Refer to Policy HR 750 for more details)

### ***Savings and Investment Plan***

A 401(k) pre-tax savings and investment plan is available to employees. Pilot's 401(k) plan offers eligible employees the opportunity to invest for retirement on a tax-deferred basis via payroll deduction. Pilot offers a percentage match of the employee contributions to the 401(k) plan. The plan is administered through the Principal Financial Group and offers employees a variety of investment choices. Refer to the Summary Plan Description provided during initial employment or contact Human Resources.

### ***Health/Dental/Life Plan***

Pilot provides a group medical/dental/life insurance plan for all eligible employees. Pilot provides employee coverage through Blue Cross Blue Shield of Alabama. Dependent coverage is also available at additional cost

to the employee. New employees are eligible for coverage the first of the month after their initial date of employment.

COBRA “continuation of coverage” is available to provide an option for health care coverage, at the employee’s cost”, in certain instances beyond the date coverage would normally end, for a limited time, at group rates, to eligible employees and family. If you experience a “qualifying life event” you need to notify Human Resources within sixty (60) days to determine if you qualify for COBRA coverage.

### ***Disability/Life Plan***

Pilot provides eligible employees with Short and Long Term Disability and Life/Accidental Death and Dismemberment insurance coverage.

The disability plan provides financial protection for the employee by paying a portion of your income while you are disabled. The amount you receive is based on the amount you earned before your disability began.

The life insurance plan provides financial assistance to your designated beneficiary by paying a benefit in event of your death, while accidental death and dismemberment insurance pays additional death benefits and provides payment for other covered losses.

### ***Cafeteria Plan***

Employees are eligible for Pilot’s Section 125 Flexible Spending Account Plan, commonly called a Cafeteria Plan. This plan allows eligible employees to have pre-taxed income set aside through payroll deduction. These untaxed funds can be used for payment of limited out-of-pocket medical expenses, private insurance premiums, and dependent care expenses. This benefit offers employees a tax-free method to save for expected, qualified expenses, at no additional cost.

### ***Direct Deposit***

Having your paycheck deposited directly into your personal bank account is required to ensure safe delivery and may be a great way to help manage your money. You must arrange to have your paycheck automatically deposited through Direct Deposit. You will receive a statement of deposit which contains all your payroll information. Contact Human Resources or Payroll Department for more information.

### ***Credit Union***

All Pilot employees are eligible to participate in a variety of services offered by America’s First Federal Credit Union.

## **Employee Relations**

### ***Performance and Conduct***

As an employee of Pilot, it is important that you perform your job at or above the set standards, and that you maintain a professional and courteous manner while at work. This includes your interactions with

clients, customers, and other Pilot employees. Failure to maintain appropriate standards of performance and conduct will result in corrective action, which could include termination of your employment. (Refer to Policy HR 50 for more details)

### ***Corrective Action***

The corrective action process is designed to ensure that you understand what your supervisor expects of you and what changes are needed if a problem exists. The process generally consists of a verbal warning and/or written warnings, however, serious misconduct or policy violations may result in suspension or immediate discharge. The corrective action policy is further outlined in the Human Resource Policy Manual. (Refer to Policy HR 500 for more details)

### ***Problem Resolution***

Pilot believes that our employees are critical to the company's success, and we are dedicated to maintaining a positive working environment.

We understand that individual problems sometimes arise on the job. You should feel free to discuss your problems with appropriate company representatives.

If you have a job-related problem, you may follow the Problem Resolution Procedure as described in the HR Policy Manual. If the problem is personal, your supervisor or Human Resources can help you locate assistance outside of the company. (Refer to Policy HR 550 for more details)

### ***Harassment***

Employees are expected to maintain a productive work environment that is free from harassing or disruptive activity. Harassment of any form is prohibited, including harassment based on race, color, religion, national origin, disability, age, marital or veteran status or sex. Non-employees (vendors, sales people, delivery personnel, etc.) are also expected to conduct their business with Pilot in accordance with this policy.

Each employee has a responsibility to promote a productive work environment that is free of any form of harassment, and in particular, sexual harassment.

Any employees who believe that they have experienced or witnessed any type of harassing or disruptive conduct has the responsibility to promptly report such conduct to the Human Resources Manager or to the Corporate General Counsel. Pilot prohibits retaliation against anyone for bringing a complaint under this policy, assisting in making a complaint, or cooperating in a complaint investigation.

Pilot will investigate every complaint of harassment or disruptive conduct as thoroughly and as promptly as possible. To the extent practical, Pilot will

keep complaints and the terms of their resolution confidential. If an investigation concludes that a violation of this policy has occurred, Pilot will take corrective action, up to and including immediate termination of the employment of any offending employee(s).

Any employee who attempts to interfere with a complaint investigation, or who retaliates in any way against an individual, who has brought a complaint or is participating in the investigation of a complaint, will also be subjected to severe disciplinary action, up to and including immediate termination of employment. (Refer to Policy HR 200 for more details)

### ***Drug Free Workplace***

Pilot is firmly committed to the health and safety of its employees and a more productive work environment by supporting the maintenance of a Drug-Free Workplace as defined by the Federal Drug-Free Workplace Act. Pilot considers the influence of drugs in the workplace to be detrimental to its employees and to its continued growth and future success. Employees with drug and alcohol abuse problems make up only a small fraction of the workforce, and Pilot regrets any inconvenience that may be caused to other employees by the problems of a few.

The distribution, sale, purchase, use, possession, or reporting to work under the influence of intoxicants, non-prescribed narcotics, hallucinogenic drugs, marijuana or other non-prescribed controlled substance while on Pilot property or during work hours is prohibited.

The distribution, sale, purchase, use or possession of equipment, products, or materials which are used, intended for use, or designed for use with non-prescribed controlled substances while on Pilot property or during work hours is prohibited.

Reporting to or being at work with a measurable quantity of intoxicants, non-prescribed narcotics, hallucinogenic drugs, marijuana or other non-prescribed controlled substances in blood or urine is prohibited.

Employees who use alcoholic beverages on the job, or report or return to work under the influence of alcohol will be subject to immediate discharge.

Reporting to or being at work with a measurable quantity of prescribed or over-the-counter narcotics or drugs in blood or urine or the use of prescribed or over-the-counter narcotics or drugs where in the opinion of Pilot such quantity or use prevents or impairs the employee from performing the duties of his or her job or poses a risk to the safety of the employee, other persons or property is prohibited. Any employee taking a prescribed or over-the-counter narcotic or drug must advise the supervisor of such use. The employee may remain on the job, or may be required to take a leave of absence or other appropriate action as determined by management.

Adherence to Pilot Drug and Alcohol Policy is a condition of employment for all employees. All employees will be required to sign the attached acknowledgment form and to consent to this policy.

All employees must notify Pilot of any criminal drug statute conviction for a violation arising out of conduct in the workplace within five (5) days of such conviction.

Managers and supervisory employees are responsible for enforcing Pilot policies. The possession, distribution or use of illegal drugs or unauthorized controlled substances whether on or off duty impacts their ability to enforce these policies and may result in disciplinary action up to and including termination. (Refer to Policy HR 450 for more details)

## **Work Environment/Miscellaneous**

### ***Safety & Health Compliance***

Pilot wants to provide a safe working environment for all of its employees and in doing so Pilot expects all employees to adhere to all company rules and regulations covering safety and health on the job.

All employees are expected to familiarize themselves with the Fire Safety Plan and the Disaster Plan for any building to which they are assigned. Any accident or injury that occurs, no matter how minor, should be reported to your immediate supervisor. Any safety violations or hazards noticed should be reported immediately to the appropriate supervisor. Any employee with questions concerning safety should contact their immediate supervisor.

The immediate job of preventing accidents and work health hazards falls upon the supervisor, not because it has been arbitrarily assigned to that person, but because the supervisor is in the position to more closely monitor and control safety issues.

All women who breastfeed their child, and who need to express milk during the working day, will work with Human Resources to determine how best to accommodate the needs of the mother while still accomplishing the performance of her job. (Refer to Policy HR 600 for more details)

### ***Dress Code***

Pilot management considers it very important that Pilot employees be well-groomed, neat and appropriately dressed for business, because appropriate dress and hygiene are important in communicating professionalism and promoting a positive company image.

## **GENERAL APPEARANCE**

During regular office hours, all personnel are expected to be dressed and groomed in a manner that projects a professional and business-like image. Since there are constantly changing styles of dress, it is impossible to list all of the appropriate or inappropriate styles of clothing for the office. The fact that a specific article of clothing is not mentioned as inappropriate does

not mean that it is acceptable for the office. Employees and supervisors alike must use good judgment and common sense in complying with the spirit of this policy. These are general guidelines to follow.

## **BUSINESS ATTIRE**

Pilot employees are expected to wear appropriate business attire that reflects a professional image.

### **FEMALE EMPLOYEES**

Examples of **appropriate business attire** include, but are not limited to: business suits, dresses and skirts of moderate length (2" above the knee or longer); loose-fitting slacks or Capri pants (mid-calf or longer) worn with a coordinating blouse, sweater, dress shirt, dress top or collared sport shirt (pull-over or polo type); and loose-fitting coordinated knit sets; coordinating dress shoes or business casual shoes such as boat/dock style shoes or sling-back shoes or dress sandals. Hosiery is encouraged, but optional. Solid earrings must be quarter size or smaller. Hoop style earrings must be three inches in length or less. No more than two earrings per ear may be worn.

Examples of **inappropriate business attire** include, but are not limited to: jeans of any color (including jean skirts and dresses); tight-fitting apparel (Lycra, Spandex or stretch material); short dresses or skirts (more than 2" above the knee); t-shirts; attire with splits or openings extending more than 3" above the knee; leggings/stirrup pants; cropped blouses or pants; tank tops; strapless or open-back dresses or tops; exposed midriffs; shorts; skirts; clothing with logos (other than Pilot's logo, Pilot's client's logo or an acceptable designer's logo); low, revealing attire or clothing of sheer or see-through material; overalls, coveralls or short-alls; or cut-offs; gothic style clothing; athletic clothing or any kind (nylon jogging suits, sweat suits; sweatshirts); athletic shoes, casual sandals, house slippers, crocs, excessive high heels, tennis shoes, sneakers, beach-type sandals or clogs; or any other attire that is found inappropriate by Pilot management.

### **MALE EMPLOYEES**

Examples of **appropriate business attire** include, but are not limited to: business suits worn with a dress shirt and tie; and business slacks worn with a dress shirt, sport coat (encouraged, but optional) and tie (encouraged, but optional); collared sport shirts (such as pull-over or polo type). Socks must be worn. Shirts must be tucked in.

Examples of **inappropriate business attire** include, but are not limited to: jeans of any color; t-shirts, tank tops, muscle shirts and denim shirts; shirts without a collar; clothing with logos (other than Pilot's logo, Pilot's client's logo or an acceptable designer's logo) overalls, coveralls or short-alls; shorts, or cut-offs; gothic style clothing; athletic clothing or any kind (nylon jogging suits, sweat suits; sweatshirts); sandals, crocs, clogs, athletic

shoes, tennis shoes or sneakers. Earrings and/or necklaces are not allowed at work.

## **EMPLOYEE GROOMING**

Hairstyles should reflect a business/professional image. No excessive hairstyles or unusual colors are acceptable. Any additional body adornments, tattoos, gaugings, piercings, tongue rings/posts, grills, etc., must not be visible or they must be considered reasonable for an office environment, as determined by Pilot standards, on a case-by-case basis.

## **SPECIAL EXCEPTIONS**

On special event days, holidays, charitable fund-raising days, etc., adjusted dress standards may be adopted for that particular day. These dress code exceptions will be announced directly to employees, in advance, by Pilot management.

Any employee has the right to request an exemption to normal dress code standards for medical or other valid reasons. This must be written request to Human Resources stating the specific reason, adjustment needed and duration for the exemption. Additional documentation may be required.

## **MONITORING AND ENFORCEMENT**

Each supervisor will be responsible for monitoring and enforcing the dress code in his/her department. If the supervisor believes that an employee is improperly dressed or groomed, the supervisor may instruct the employee to return home to change clothes.

If an employee has any questions concerning whether a certain type of apparel is appropriate, the employee should consult with the immediate supervisor or Pilot Human Resources prior to wearing the garment.

Failure to comply with the Pilot dress code requirements can result in disciplinary action being taken against an employee. (Refer to Policy HRC 900 for more details)

## ***Electronic Communications***

Pilot is committed to the utilization of computer technology as a means to aid the efficiency and productivity of the Pilot organization. It is Pilot's policy that all computer hardware and software provided to its employees is to be used primarily for conducting the business affairs of Pilot.

All information contained or stored within any computer technology is considered the property of Pilot. All text or voice messages composed, sent or received via any computer are and remain the property of Pilot. Pilot reserves and intends to exercise the right to monitor, audit, review, intercept and access, with or without notice, the use of its computers. Employees are personally responsible for the effective, ethical and lawful use of computers. Pilot intends to maintain constant scrutiny over the security and use of its computer.

Pilot provides some of its employees with e-mail communications. The primary purpose of the e-mail system is to expedite necessary business communications between two or more individuals. As such, the use of e-mail is for Pilot's business purposes. Use of e-mail is a privilege and may be revoked at any time. Use of e-mail constitutes acceptance of this policy. Employee-users are expected to be knowledgeable of these and all policies of Pilot. Any questions should be directed to the Technology Services Department (TSD). Violations of this or any other policy subjects the employee-user to immediate revocation of system privileges and may result in disciplinary action, up to and including termination. Any information included in e-mail communications becomes the property of Pilot and is subject to monitoring for compliance with all Pilot policies by Pilot management. (Refer to Policy HR 700 for more details)

### ***Conflict of Interest***

Every employee of Pilot has the obligation to act in the best interest of Pilot while conducting Pilot business. A conflict of interest exists when an employee has a relationship with any person, company, or business, or engages in any activity, or has any personal financial interest that may impair their independence of judgment or influence their decisions or actions concerning Pilot business. It is expected that employees will exercise prudent judgment, and, at all times, will avoid any situation which might be subject to question. An employee should immediately consult with management in order to resolve any conflict of interest questions.

Outside Financial Activities - Pilot will consider a possible conflict to exist when an employee holds a financial interest in, or receives a personal benefit from, any business venture which is substantially similar to any Pilot business venture or any business which furnishes or may furnish services, materials, or supplies to a Pilot business unit.

"Financial interest" for this purpose, means any position as owner, proprietor, manager, partner (active or silent), shareholder or beneficiary of any such business firm, if such interest is held by the employee and/or immediate family members. "Financial interest" or "personal benefit" does not, in most instances, pertain to ownership of shares in publicly held firms.

Gifts or Other Benefits - An employee's reputation for honesty and integrity must never be subject to question. The acceptance of gifts, gratuities or other benefits has the potential to create the perception that an employee's business judgment has been inappropriately influenced or compromised.

Appearance of Conflict of Interest - Perceived improprieties may be as disruptive and damaging as actual transgression. All employees must avoid the intent and appearance of unethical or compromising practices in relationships, actions and communications. (Refer to Policy HR 400 for more details)

### ***Licensing/Certification***

All adjuster employees must obtain and maintain all licenses and/ or certifications required by federal, state and local law. Pilot recommends obtaining licenses in all states to which the employee anticipates being deployed to work. Pilot recommends that the employee obtain as many of the various insurance company certifications as possible. It is also recommended that the employee obtain any other licenses or certifications that will maximize his/her eligibility for assignments across the country. Copies of Licenses/Certifications must be submitted to Pilot in advance in order to be eligible for employment. The employee is responsible for keeping all applicable licenses/certifications current. (Refer to Policy HR 800 for more details)

### ***Disclosure of Confidential Company Information***

Employees, during the course of their employment with Pilot, will from time to time have contact with or access to confidential and proprietary information of Pilot, its employees and its clients. The unauthorized disclosure of such confidential or proprietary information could cause irreparable harm to the business of Pilot and clients. Such information must be kept strictly confidential by employees at all times, and employees must use due care and discretion to protect and secure such information at all times.

All files, claim reports, documents, exhibits, photographs and other material and information concerning Pilot, any employee, any insurance company or other client of Pilot, the business matters of Pilot or its clients and/or any other matter made known to an employee as a result of his/her employment with Pilot shall be considered to be confidential and proprietary information. Employees must recognize that this includes, but is not limited to, information regarding the names, addresses and agents of the policyholders of Pilot clients, the description and location of insured property and the expiration or renewal dates of policies. Likewise, information concerning the identity, location, compensation or similar employee information is considered confidential. Employees must not, directly or indirectly, loan, use, disseminate, sell, give or otherwise reveal or release any confidential or proprietary information to any person except with the express written permission of duly authorized officers of Pilot and its clients. (Refer to Policy HR 350 for more details)

### ***Personal Identifiable Information (PII)***

It is Pilot's policy to comply with all state and federal laws in regards to Personal Identifiable Information (PII) of Pilot's employees, clients and its clients' customers. Pilot's philosophy is to safeguard PII in its electronic possession (ePII) and to ensure the confidentiality of this information. ePII is information which is computer based, and is used or stored on digital

media and equipment, including but not limited to computers, laptops, disks, memory sticks, PDA's, servers, networks, dial-modems, E-Mail or websites. The scope of this policy is intended to be comprehensive and includes company requirements for the security and protection of such information throughout the company and its approved vendors both on and off work premises. (Refer to Policy HR 825 for more details)

### ***Non-Disparagement***

Pilot enjoys a good reputation among its customers, within the industry, and/or within the business community, and employees have a duty to protect that good reputation. Employees must endeavor to protect and not diminish or disparage that reputation and accordingly must refrain from all instances of conduct or utterances which could reasonably be considered as disparaging of Pilot, its customers, its vendors or suppliers, any of its past or present employees, and/or the public. This provision applies to all communications, including, but not limited to, print and/or electronic publications and/or media (including, but not limited to, the Internet, emails, "blogs", "chat rooms", newspapers, magazines, brochures, letters, iPODs, podcasts, television, radio, and otherwise) that will or may be seen, read, and/or heard by any number of others, regardless of how large or how small in number.

Do not disclose any information that is confidential or proprietary to Pilot or to any third party that has disclosed information to the company. Consult the company's confidentiality policy for guidance about what constitutes confidential information.

Uphold Pilot's value of respect for the individual and avoid making defamatory statements about Pilot employees, clients, suppliers, partners, affiliates and others, including competitors. (Refer to Policy HR 950 for more details)