

DELAMAR

ARTISAN



Employee Handbook

Traverse City, MI

TABLE OF CONTENTS

SECTION I: INTRODUCTION

A Personal Welcome.....

SECTION II: AN IMPORTANT WORD REGARDING EMPLOYMENT

At-Will Employment.....

Equal Employment Opportunity.....

Anti Harassment Policy.....

SECTION III: YOUR JOB

Employee Classifications.....

Hours of Work.....

Work and Lunch Breaks.....

Overtime

Time Records.....

Attendance.....

Pay Day.....

Travel and Reimbursements.....

SECTION IV: PERFORMANCE MANAGEMENT

Orientation

Probationary Evaluation Period.....

Employee Evaluations

Conflicts of Interest.....

Complaint Resolution.....

Employee Suggestions

SECTION V: YOUR BENEFITS

Introduction to Your Benefits.....

Time Away from Work.....

Holidays
Vacation
Absence from Work Days (Sick Days).....
Military Leave.....
Pregnancy Leave.....
Personal Leave.....
Jury Duty.....
Bereavement
Maximum Absence from Position.....
Family and Medical Leave.....

Insurance Benefits.....
Health Insurance.....

A Word About Our Group Health Plan and Privacy.....
Life Insurance.....
Dental Insurance.....

Retirement Benefits.....
Profit Sharing Plan.....

Other Benefits You Receive.....
Training Programs.....
Product Discounts.....

SECTION VI: PROTECTING YOU AND YOUR WORK ENVIRONMENT

Personnel and Medical Records.....

Privacy Protection Policy

Solicitation and Distribution.....

Company Closings.....

Drugs and Alcohol.....

Company Equipment and Property

Electronic Communications.....
Tape Recorders, Cameras, and Cell Phones with Camera Capability.....

Social Media.....

Workplace Threats and Violence

Smoking

Building Access.....

Dress Code.....

Health and Safety Concerns.....

Rules of Conduct.....

SECTION VII: IF YOU LEAVE US.....

Termination of Employment.....

References.....

ACKNOWLEDGMENT OF RECEIPT OF EMPLOYEE HANDBOOK

CORPORATES CONTACT INFO:

Saeed Nasiri-CFO/VP of Operations: SNasiri@thedelamar.com; Ph:203-413-3527

Annmarie Pepiciello- Human Resources: APepiciello@thedelamar.com Ph:203-307-4218

Section I: Introduction

A Personal Welcome

It is a pleasure to welcome you to our organization. You have chosen employment with a company that is rapidly growing; a place where you can make a real difference. Our continued growth and progress depend on our employees: people with initiative, creativity and enthusiasm. We are committed to attracting, developing and retaining high quality employees and rewarding them for the results they achieve.

Our most noted quality is the exceptional personalized service which we offer our guests. The guest is paramount and guest service is the single most important thing we provide. There are many other hotels that provide lodging and dining, but our goal is to set ourselves apart from all the others and to be known as one of the finest hotels anywhere. We achieve this by constantly delivering excellent guest service, by anticipating every guest's needs and by consistently exceeding even their highest expectations.

You are now a member of the Delamar team. We have prepared this handbook to acquaint you with some of our policies. Please read it carefully and retain it for future reference. This handbook is not intended to be a complete statement of all our policies and procedures, nor is a contract of employment, either express or implied. Rather, it is provided as a guide to help you understand some of our benefits, and work life at the company. In order to adapt to our changing needs, Delamar may revise, discontinue, suspend or modify any of the policies contained in this handbook at any time, at its sole discretion.

Your supervisor will be happy to discuss the information in this handbook with you should you have any questions.

We hope you will find your job with us to be an exciting and enriching experience. We look forward to working with you.

SECTION II: An Important Word Regarding Employment

At-Will Employment

Delamar adheres to the policy of **employment-at-will**, which enables either the employee or the employer to terminate the employment relationship at any time, with or without cause and with or without notice. The policy of employment-at-will may only be modified by a formal, written contract, signed by both the employee and corporate officer, evidencing Delamar's intent to enter into a contract of employment. The company reserves the right to take appropriate disciplinary action against an employee, including termination or a lesser form of discipline, at its sole discretion.

Immigration Reform and Control Act

In compliance with the federal Immigration Reform and Control Act of 1986 (IRCA), as amended, and any state law requirements, if applicable, our company is committed to employing only individuals who are authorized to work in the United States.

Each new employee, as a condition of employment, must complete the Employment Eligibility Verification Form I-9 and present documentation establishing identity and employment eligibility.

If an employee is authorized to work in this country for a limited time period, the individual will be required to submit proof of renewed employment eligibility prior to expiration of that period to remain employed by the company.

Equal Employment Opportunity

It is the policy of Delamar to provide equal opportunity in employment to qualified individuals regardless of race, color, religious creed, age, sex, marital status, national origin, ancestry, physical or mental disability, mental retardation, learning disability, sexual orientation, genetic information, or any other legally protected class in accordance with all applicable laws. This commitment extends to all employment decisions, including, but not limited to, recruiting, hiring, promotion, training, compensation, discipline and discharge, and to all terms, benefits, privileges and conditions of employment. Discrimination in violation of this policy is prohibited and will not be tolerated. Employees should be aware that recent court decisions have indicated that the failure to report an allegation of illegal discrimination to the company may jeopardize their rights to pursue such a claim outside of the company.

Equal Employment Opportunity Complaint Procedure

Employees who encounter problems, questions or concerns with equal employment opportunity should notify their supervisor or the Human Resources Department.

Requesting Reasonable Accommodation

Employees who, by virtue of a disability, illness or physical or mental impairment, require reasonable accommodation are to make a request to the Human Resources Department. The accommodation process may require additional medical information which will be maintained on a confidential basis.

Pregnancy Accommodation

Delamar will provide reasonable accommodations to female employees related to pregnancy, childbirth, or related medical conditions, to the extent the accommodation can be made without imposing an undue hardship on the business.

When an employee requests a reasonable accommodation, the company will explore with the employee the possible means of providing the reasonable accommodation, which may include, but are not limited to:

- allowing more frequent breaks or periodic rest;
- assisting with manual labor;
- modifying job duties;
- modifying work hours/schedules;
- temporary transfer to a less strenuous or less hazardous position; or
- providing a leave of absence.

The company may require the employee to provide a certification in connection with a request for reasonable accommodation that includes the following:

- the date the reasonable accommodation became medically advisable;
- the probable duration of the reasonable accommodation; and
- an explanatory statement as to the medical advisability of the reasonable accommodation.

If leave is provided as a reasonable accommodation, such leave may run concurrently with the federal Family and Medical Leave Act and/or any other leave where permitted by state and federal law.

For more information, or if you require an accommodation, please contact your supervisor.

Anti-Harassment Policy

Harassment based on an individual's race, color, religious creed, age, sex, marital status, national origin, ancestry, physical or mental disability, mental retardation, learning disability, sexual orientation, genetic information, or any other legally protected class in accordance with all applicable laws, will not be tolerated. Similarly, sexual harassment in the workplace is unacceptable conduct and will not be tolerated or condoned.

Sexual Harassment

Sexual harassment is defined as unwelcome sexual advances, request for sexual favors and other verbal or physical conduct of a sexual nature that explicitly or implicitly enters into the employment situation.

What should I do if I think I've been harassed either sexually or on the basis of another protected class?

Employees should feel free to tell the harasser to stop the offending behavior. In addition, employees who believe they have been harassed by a company employee, vendor, consultant, customer, client, or contractor should contact either their supervisor or the Human Resources Department. Any supervisor who becomes aware of inappropriate conduct must immediately notify any company officer.

All complaints of illegal harassment will be immediately and thoroughly investigated and appropriate action will be taken to remedy any such conduct. All complaints of such harassment will be kept confidential to the extent practical under the circumstances, with information about them given only to those people necessary to the investigation and resolution.

Any employee found to have engaged in inappropriate behavior, including illegally harassing behavior, will be subject to serious disciplinary action, up to and including termination of employment.

Employees may bring their good faith complaints of harassment without fear of retaliation.

Section III: Your Job

Guest Relations

We must always ensure that our guests are receiving the best possible service. Therefore, it is every employee's responsibility to greet each guest in all encounters (lobby, elevators, restaurant, corridors, guest rooms, etc.) with a welcoming smile and appropriate words such as:

- "Good Morning, Mrs./Mr. ..;"
- "Welcome to Delamar;"
- "I hope you enjoyed your stay/dinner," and so forth.

We always try to personalize the conversation as much as possible.

The "20/10" Rule

When a guest is within 20 feet, all conversation between staff members has to be ended in order to give full attention to the guest. When a guest is within 10 feet you "own" that guest and must acknowledge them with a smile and welcoming words. Always be the first to greet the guest and establish eye contact. The same 10-foot rule applies to encounters with fellow employees.

Building for the Future

At all times, you represent the company, and it is up to each one of you to take this responsibility seriously. Our company exists with your joint efforts. Don't underestimate your contribution to it. A great many people outside the business who invest their time, money and faith in us are part of that equation. They are our guests. They will determine how fast we grow, how many people we will employ, how much service we render and the profit we make. In order to retain these guests, we want to ensure that our good service continues by always giving our guests the best possible value and quality. Working together and working well provides us with a bright future and with the most important commodity, a good reputation.

Employee Classifications

Each employee is classified as a full-time, part-time, or temporary employee. Temporary employees may be hired as temporary employees of Delamar or are employees of an employment agency assigned to work at Delamar. In addition, each employee is either an exempt salaried or non-exempt hourly employee.

Regular Full-time

A regular full-time employee is an employee hired for an indefinite period and regularly scheduled to work at least 30 hours per week. These employees are eligible for participation in all employee benefits subject to the terms and conditions of each benefit program.

Regular Part-time

A regular part-time employee is an employee hired for an indefinite period and regularly scheduled to work less than 30 hours per week. Regular part-time employees may be eligible for some company benefits.

Temporary

A temporary employee is an employee hired to fill short-term program needs on an intermittent basis. Temporary employees receive no benefits other than those required by law.

Variable Hour Employee

A variable hour employee is an employee who is hired to work hours that will vary from week to week or month to month or employees hired into seasonal, temporary or contingent positions. Variable hour employees receive no benefits other than those required by law.

Exempt Salaried Employees

Exempt salaried employees are those employees whose duties are such that they are exempt from the overtime and minimum wage provisions of state and federal wage and hour laws. In general, employees engaged in executive, administrative, and professional work fall within this classification.

Deductions from Exempt Salary

Both state and federal law provide for deductions from the salary of an exempt employee in limited circumstances. It is the policy of Delamar to only deduct from the salary of an exempt employee in accordance with both state and federal law. Any deduction from the salary of an exempt employee must be approved by the Human Resources Department.

Non-exempt Hourly Employees

Non-exempt hourly employees are those employees who are subject to the overtime and minimum wage provisions of state and federal wage and hour laws. In general, such employees are eligible for overtime pay for work in excess of 40 hours per week. Time and one half the hourly rate of pay will be paid when an hourly employee works in excess of 40 hours in the week.

Hours of Work

Delamar provides employees with starting and ending times based on customer needs. While we make every effort to accommodate the individual needs of our employees, our primary obligation must be to service the needs of our customers. No changes in an employee's work hours or schedule may be made on an indefinite basis unless authorized by their supervisor.

Work and Lunch Breaks

Lactation Breaks

Delamar will provide a reasonable amount of break time to accommodate a female employee's need to express breast milk for the employee's infant child. The break time should, if possible, be taken concurrently with other break periods already provided. Non-exempt employees should clock out for any time taken that does not run concurrently with normally scheduled rest periods, and such time generally will be unpaid, in accordance with state law. The company will also make a reasonable effort to provide the employee with the use of a room or other location in close proximity to the employee's work area, for the employee to express milk in private.

Notify your manager to request time to express breast milk under this policy. The company reserves the right to deny an employee's request for a lactation break if the additional break time will seriously disrupt operations and in accordance with applicable law.

No provision of this policy applies or is enforced if it conflicts with or is superseded by any requirement or prohibition contained in a federal, state, or local law or regulation. If you have knowledge of such a conflict or a potential conflict you should contact your manager.

Overtime

Employees are expected to work overtime in any department or job to which they are assigned. All overtime must be authorized by the employee's supervisor in advance. Anyone working unauthorized overtime will be appropriately disciplined. Unless otherwise excused, employees who do not work assigned overtime will be considered absent and subject to discipline.

If you have any questions regarding your overtime pay, please check with your manager.

Non-exempt employees will be paid time and one half for all hours actually worked in excess of 40 hours in any workweek. Vacation days, holidays, sick days and any hours not worked will not be considered for purposes of calculating overtime.

Time Records

All non-exempt employees must keep accurate records of their time worked in accordance with procedures provided by their supervisor. Employees must record their

time at the beginning and end of their shift and for meal breaks. They must not perform any work more than five minutes before the beginning or after the end of their shift.

Employees are strictly forbidden from altering another employee's time record.

Employees who wish to make a correction to their own time record must immediately contact their supervisor.

The workweek starts on Sunday and ends on Saturday for hotel employees.

Attendance

Regular attendance at work is an essential function of every job at Delamar and is a condition of employment. It is critical that every employee report to work each day and on time. Employees are expected to attend to personal affairs and obligations at times outside of working hours.

Tardiness

Employees reporting to work after their scheduled start time or appointment time will be considered tardy. Employees who are excessively tardy may be subject to termination of employment.

Leaving Early

All employees are expected to work their entire shift unless otherwise authorized. Leaving early will be considered the equivalent of being tardy.

Reporting Absences

All employees who are unable to report to work must call their supervisor, or in the event the supervisor is not available, leave a message on the supervisor's voice mail within two hours of their regularly scheduled start time. Excessive absenteeism may be grounds for disciplinary action, up to and including termination of employment.

Please note: If you are absent for three (3) days without notifying the company, it is assumed that you have voluntarily abandoned your position within the company, and you will be removed from the payroll.

Pay Day

Employees are paid bi-weekly. The payroll cycle starts on Sunday and ends on Saturday on a bi-weekly basis. Paychecks will be received bi-weekly on Fridays. If a payday falls on a nonworking day, employees will be paid the preceding workday.

Paychecks will not be given to anyone other than the employee without the employee's express written authorization. There are no pay advances. As a service to our employees, voluntary direct deposit of the paycheck is available.

Travel and Reimbursements

Any employee who is required to travel is responsible for his or her own expenses and will be reimbursed by Delamar for reasonable expenses upon the submission and approval of an expense report with receipts. Reasonable travel expenses are airfare, car rental, lodging, meals and mileage. Reimbursement for dinner only applies to overnight travel.

Any employee using his or her own automobile for company business will be reimbursed for mileage at a rate established by the company. All mileage reimbursements must be submitted in accordance with department procedures.

Section IV: Performance Management

Probationary Evaluation Period

The probationary evaluation period for all new employees is 90 days, but may be modified at management's discretion. During this period, each employee has the opportunity to demonstrate the aptitude, attitude and abilities for the job for which he or she was hired. Employees will be advised of their continued employment status either during the course of, or at the conclusion of, the 90-day period. Please note that completion of the probationary period does not change the at-will nature of your employment.

On The Job Training

Your manager is responsible for initiating all on-the-job training for employees within your department. This may include safety training, participation in off-site training and continuing education when necessary for job safety and work performance. Training will be conducted during regular working hours whenever possible.

The company will pay for any required training programs. Employees may be tested from time to time to evaluate the effectiveness of the training program.

If you have any questions regarding training, please see your manager.

Employee Evaluations/Performance Reviews

Employees are encouraged to discuss their performance with their supervisors often and informally. Formal evaluations are generally conducted annually, on or about your employment anniversary. New employees will generally receive a review at the end of their probationary period, if not more frequently. These evaluations provide an opportunity to consider and discuss the overall performance of the employee as well as special areas such as the quantity and quality of work, customer service, cooperation, attitude, attendance and other matters.

Pay adjustments, if any, generally coincide with the performance appraisal discussion. Pay adjustments, of course, are not automatic, and interim adjustments can be considered in special situations. If these interim adjustments are made, the next review date will be one year from the effective date of the interim adjustment.

Conflicts of Interest

Each employee has a responsibility at all times to promote Delamar's best interests. This is an obligation to Delamar's clients/customers, employees, and all others concerned with, or dependent upon, the welfare and progress of the Company.

A conflict of interest occurs when an employee's judgment in acting for Delamar is adversely affected. Examples of conflicts of interest include, but are not limited to:

1. Accepting gratuities from other companies or individuals who do business with Delamar or seek to do business with it;
2. Rendering services to competitors, engaging in outside employment for a client or competitor, or behaving in any way which conflicts with the work of Delamar;
3. Using or permitting others to use Delamar documents, equipment, confidential information or trade secrets;
4. Benefiting personally from any purchases or sales by Delamar.

If you have, or feel you have, encountered a situation that might be regarded as a conflict of interest, you must immediately consult your supervisor.

Engagement in any business practices that compromises Delamar in any way may result in the immediate termination of any and all employees involved in such activity, and may be grounds for legal action against those employees.

Complaint Resolution

We all recognize that the accumulation of unspoken, unanswered problems can result in dissatisfaction and can impact the working relationship. If you have a problem, it is to everyone's advantage to bring it out in the open. If you have a problem or complaint, please review it with your supervisor or the Human Resources Department as soon as possible.

We are not implying that we will agree with your position. However, we will listen to you and, we hope that in most instances, we will be able to resolve the matter or reach a compromise acceptable to the people concerned.

Employee Suggestions

Delamar welcomes suggestions and questions from employees. These may be questions on policy or working conditions, or they may be suggestions on ways to reduce costs and waste. We greatly encourage suggestions, since we believe the individual working on a particular task can best recommend ways to increase quality and productivity.

Section V: Your Benefits

Introduction to Your Benefits

The following is a brief summary of benefits currently offered by the company, but note that these benefits may change or be eliminated from time to time at the sole discretion of management. It should also be noted that where the summary in this handbook and that in the summary plan description or insurance documents differ, the summary plan description or the insurance documents would control.

Time Away from Work

Holidays

The company observes the following paid holidays: New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, Christmas Day

In the event one of these holidays falls on Saturday or Sunday, the Company will determine the day on which the holiday will be observed.

Regular, full-time employees who have successfully completed the probationary period and have at least three months of continuous active service, will be paid eight hours pay at their current rate for each holiday. Exempt employees will receive holiday pay in compliance with state and federal wage laws.

Non-exempt employees who work on a holiday listed above will be paid double time & a ½ on that holiday for the hours worked. Non-exempt employees who do not work on a holiday listed above will receive straight pay.

Regular full-time employees are eligible to receive holiday pay. In order to receive holiday pay, you are required to work your full normal shift on your last regularly scheduled workday before the holiday and the full normal shift of your first scheduled workday immediately after the holiday. If you wish to take an extra day or depart early, you must have prior approval from your supervisor in order to obtain holiday pay.

Holiday pay will not count towards hours worked in computing overtime.

Employee's Birthday: You may take your birthday off paid if the operation allows. If you cannot take your birthday day off you may use this day as a personal day. This day must be used within the same calendar year and will not carry over. This day does not get paid out upon termination of employment.

Vacation

The Company provides vacation after one year of active service. Paid vacation may be taken after an employee has completed the full year of active service. Unpaid vacation time may be taken with the approval of your supervisor.

Eligibility for Vacation

The company provides vacation time for regular full-time employees. Vacation is calculated according to your anniversary date, as follows:

- After one (1) full anniversary year of service, the employee shall be entitled to ten (10) days of paid vacation;
- After three (3) full anniversary years of service, the employee shall be entitled to fifteen (15) days of paid vacation.
- After five (5) full anniversary years of service, and each year thereafter, the employee shall be entitled to twenty (20) days of paid vacation.

Planning Vacation Time

Vacation time may only be taken during slow season (November 1st- April 1st) and requires pre-approval from management. Vacation requests should be submitted at least 3 weeks in advanced using the vacation request form. Approval of vacation schedules is based on the needs of the business. In the event of a conflict in vacation time, preference will be given to the employee's length of service.

Carrying Over Vacation Days

We encourage employees to use their vacation time. However, employees are allowed to carry over up to twenty (20) days of unused vacation time from the preceding year.

Payment upon Termination of Employment

Earned but unused vacation time to a maximum of 20 days will be paid upon termination of employment. If an employee is terminated for cause they will not be paid out any vacation time.

Absence from Work Days (Sick Days)

Employees are eligible, after their introductory period, for seven (7) paid sick days per year.

Sick days are calculated according to the calendar year.

During your initial year of employment, after completing the introductory period, you receive sick days on a prorated basis. Your manager will inform you of the number of days and the date on which you become eligible.

Exempt employees will receive sick pay in compliance with state and federal wage and hour laws.

You may use accrued sick time to care for your sick child.

Sick days cannot be carried over to the following year.

For paid sick leave of three or more consecutive days, please provide the company with reasonable documentation that such leave is being taken for a permitted reason in accordance with this policy.

At the end of employment, employees are not paid for earned but unused sick days.

Military Leave

Employees will be granted military leave in accordance with all applicable laws.

Pregnancy Leave

Delamar will grant a reasonable leave of absence as a result of a disability relating from pregnancy in accordance with all applicable laws.

Employees are granted a reasonable leave of absence due to a pregnancy related disability. An employee returning from maternity leave is reinstated to her original position with equivalent pay and accumulated seniority, retirement and fringe benefits, unless the company's circumstances have changed making reinstatement impossible or unreasonable.

If you are pregnant and reasonably believe that continuing to work in your present position may cause injury to you or your fetus, you may request a temporary transfer to another position. After giving the company written notice of your pregnancy and request for transfer the company will make a reasonable effort to transfer you to a suitable temporary position if one is available.

This leave may run concurrently with the Federal Family and Medical Leave Act and/or any other leave where permitted by state and federal law.

Personal Leave

Personal leaves of absence may be granted at the discretion of management.

Jury Duty

It is part of our duty as citizens to fulfill jury duty commitments as necessary. If you are called for jury duty, you must inform your supervisor as soon as possible in order that your work assignment can be covered. Providing that you give your supervisor court documentation that jury duty has been served, Delamar will pay regular full-time employees working at 30 hours or more per week their regular daily rate of pay (excluding overtime) for the first five days of jury duty as provided under Michigan law. Thereafter, the company will grant you an unpaid leave in order to serve. In those instances where the company feels that an employee's jury duty service would seriously disrupt normal company operations, the company may request that the employee be excused from such service. The Company expects you to return to your job if you are excused early from jury duty during your regular working hours. However, an employee who has served eight hours of jury duty in any one day will not be required to return to work on that same day.

Bereavement

Full-time employees who have completed three months of employment are eligible for three paid days for the death of an immediate family member. Members of the immediate family include spouses, domestic partners, parents, brothers, sisters, children, children of domestic partners, grandchildren, grandparents, parents-in-law and parents of domestic partners.

Requests for bereavement leave should be made to your manager as soon as possible. Our company reserves the right to request written verification of an employee's familial relationship to the deceased and his or her attendance at the funeral service as a condition of the bereavement pay. Paid leave is only available if requested by the employee and work has been scheduled for the employee on those days.

Family and Medical Leave

It is the policy of Delamar to grant up to 12 weeks of family and medical leave during any 12-month period to eligible employees, or up to 26 weeks for military caregivers, in accordance with the Family and Medical Leave Act of 1993 (FMLA). Additional time may be available through the Michigan FMLA. The leave may be paid, unpaid, or a combination of paid and unpaid leave, depending on the circumstances of the leave and as specified in this policy. For purposes of this policy, the 12 month period for the federal FMLA and for the Michigan FMLA is based on the first day leave is taken for 12 or 24 month period going forward.

Eligibility

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

- 1) The employee must have worked for Delamar for 12 months.
- 2) The employee must have worked at least 1,250 hours during the twelve-month period immediately before the date when the leave is requested to commence.
- 3) The employee must work at Delamar or in an office or worksite where 50 or more employees are employed by Delamar or within 75 miles of that office or worksite.

Reasons for Leave

In order to qualify as FMLA leave under this policy, the employee must be taking leave for one of the reasons listed below:

- 1) the birth of a child and in order to care for that child;
- 2) the placement of a child for adoption or foster care, and to care for the newly placed child;
- 3) to care for a spouse, child, or parent with a serious health condition; or
- 4) the serious health condition (described below) of the employee.
- 5) a “qualifying exigency” (defined below) arising out of the fact that the spouse, son, daughter, or parent of the employee is on active duty, or has been notified of an impending call to active duty status, in support of a contingency operation.

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

requires continuing care by a licensed health care provider. Continuing treatment by a health care provider is defined as:

- a) Any period of incapacity of more than three consecutive, full calendar days, and any subsequent treatment or period of incapacity relating to the same condition, that also involves: (1) In-person treatment visit two or more times, within 30 days of the first day of incapacity, unless extenuating circumstances exist, by a health care provider, by a nurse under direct supervision of a health care provider, or by a provider of health care services (e.g., physical therapist) under orders of, or on referral by, a health care provider; or (2) In-person treatment visit by a health care provider on at least one occasion, which results in a regimen of continuing treatment under the supervision of the health care provider. The first (or only) in-person treatment visit must take place within 7-days of the first day of incapacity.
- b) Any period of incapacity due to pregnancy, or for prenatal care.
- c) Any period of incapacity, or treatment for such incapacity, due to a chronic serious health condition. (A chronic serious health condition involves periodic visits, at least twice a year, to a health care provider for treatments, continues over an extended period of time and may cause episodic periods of incapacity such as occurring with diabetes, asthma, and epilepsy.)
- d) A period of incapacity which is permanent or long-term due to a condition for which treatment may not be effective (i.e., Alzheimer's disease).
- e) Any period of absence necessary to receive multiple treatments by a health care services provider under orders of, or on referral by, a health care provider, either for restorative surgery after an accident or other injury, or for a condition that would likely result in a period of incapacity of more than three consecutive calendar days in the absence of medical intervention or treatment.

A qualifying exigency is defined as a non-medical activity that is directly related to a military member's active duty or call to active duty status, for one or more of the following qualifying activities: (1) Short-notice deployment; (2) Military events and related Activities; (3) Childcare and school activities; (4) Financial and legal arrangements; (5) Counseling; (6) Rest and recuperation; (7) Post-deployment activities; (8) parental care; and, (9) Additional activities that arise out of the covered military member's active duty of call to active duty status provided that the employer and employee agree that such leave shall qualify as an exigency and agree to both the timing and duration of such leave.

An eligible employee can take up to 12 weeks of leave under this policy during any 12-month period. Delamar will measure the 12-month period as a 12-month period measured forward from the date an employee uses any FMLA-qualifying leave.

Additional Leave Entitlement for Military Caregiver

An eligible employee who is the spouse, son, daughter, parent, or next of kin of a covered service member who is recovering from a serious illness or injury sustained in the line of

duty on active duty is entitled to up to 26 weeks of leave in a single 12-month period to care for the service member. This military caregiver leave is available during “a single 12-month period” during which an eligible employee is entitled to a combined total of 26 weeks of all types of FMLA leave. The “single 12-month period” for military caregiver leave begins on the first day the eligible employee takes military caregiver leave and ends 12 months after that date.

Employee Benefits During Leave

While an employee is on leave, Delamar will continue the employee's group health insurance during the leave period at the same level and under the same conditions as if the employee had continued to work.

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

If the employee chooses not to return to work for reasons other than a continued serious health condition of the employee or the employee's family member, Delamar may require the employee to reimburse the company the amount the company paid for the employee's health insurance premium during the leave period.

Employee Status After Leave

An employee who takes leave under this policy will be able to return to the same position or a position which is substantially similar.

Delamar may choose to exempt certain highly compensated employees from this requirement and not return them to the same or similar position.

Use of Paid and Unpaid Leave

If the employee has accrued or earned paid leave the employee must use paid leave first and take the remainder of the twelve weeks as unpaid leave. Delamar will notify the employee that the leave is designated as FMLA leave.

Disability leave for the birth of the child and for an employee's serious health condition, including workers' compensation leave (to the extent that it qualifies), will be designated as FMLA leave and will run concurrently with FMLA leave.

Intermittent Leave or a Reduced Work Schedule

The employee may take FMLA leave in consecutive weeks, or may use the leave intermittently or under certain circumstances may use the leave to reduce the workweek or workday, resulting in a reduced work schedule as required under law. In all cases, the leave may not exceed a total of 12 workweeks over a 12-month period, or 26 weeks in a single 12-month period where all or a portion of the leave is to care for a covered military service member who is recovering from a serious illness or injury sustained while on active duty, unless extended by state law.

Delamar may temporarily transfer an employee to an available alternative position with equivalent pay and benefits if the alternative position would better accommodate the intermittent or reduced schedule.

Certification of the Serious Health Condition

Delamar may ask for a health care provider's certification of the serious health condition. Failure to provide certification may result in a denial of leave. Medical certification may be provided by using the Medical Certification Form available from the company.

Procedure for Requesting Leave

All employees requesting leave under this policy must provide verbal notice with an explanation of the reason(s) for the needed leave to their immediate supervisor, and otherwise comply with Delamar's usual and customary notice and procedural requirements for requesting leave.

When an employee plans to take leave under this policy, the employee must give Delamar 30 days' notice. If it is not possible to give 30 days' notice, the employee must give as much notice as is practicable. An employee who is to undergo planned medical treatment is required to make a reasonable effort to schedule the treatment in order to minimize disruptions to the company's operations.

If an employee fails to provide 30 days' notice for foreseeable leave with no reasonable excuse for the delay, the leave request may be denied until at least 30 days from the date Delamar receives notice. While on leave, employees are requested to report periodically to the company regarding the status of the medical condition, and their intent to return to work.

Insurance Benefits

Health Insurance

All regular full-time employees become eligible to enroll in the health plan program 1st of the month following (60) days of continuous employment with Delamar. Enrollment at times other than the initial enrollment period, such as the annual open enrollment period, may be made to the extent allowable under the contract of insurance or as the law permits. Co-payment deductions for coverage are made bi-weekly. Delamar contributes toward the premium cost for employees. The contribution rate is subject to change.

For coverage and eligibility purposes, in accordance with federal health care reform, Delamar applies a measurement period and a stability period. Regular part-time employees are not eligible for coverage on the plan. Temporary, seasonal, and variable hour employees who are not employed an average of at least 30 hours of service per week during the applicable measurement period are not eligible for coverage in the successive stability period.

In the event of a change of status (e.g., marriage, divorce or legal separation, birth of a child or adoption, etc.) of the employee and/or the employee's dependents, it is important that the employee or dependent notify the company of the change immediately.

Supplemental Employer Premium Contributions

Delamar generally calculates employer premium contributions based on the same formula or calculation based on the classification of employee and the coverage type. The company may, in its sole discretion, make supplemental contributions towards an employee's premium to ensure the percentage cost of employee-only coverage in the plan offered does not exceed 9.5% of the employee's monthly pay. Delamar will notify applicable employee's accordingly in the event supplemental employer premium contributions are anticipated.

A Word About Our Group Health Plan and Privacy

Delamar does not disclose your nonpublic personal medical and financial information, except as required or permitted by law. The company will ensure that its practices and standards comply with the Health Insurance Portability and Accountability Act and other applicable federal and state laws and regulations. Delamar will uphold the higher privacy standard when there is a conflict between applicable state and federal regulations.

Information We Receive

We receive nonpublic personal medical and financial information about our plan participants from the following sources:

- 1) Applications, authorizations and other forms you or your representative provides;
- 2) Documentation collected during your care (test results, physician orders, etc.);
- 3) Billing and payment transactions (such as claims submission with insurance companies and payment) with us, our affiliates or others; and
- 4) Outside sources pertaining to your care or coverage, such as health care providers, insurance companies and federal and state agencies.

How We Protect Your Information

Our policies restrict access of your information to employees who need this information to provide services to you and as permitted by law. We maintain physical, electronic and procedural safeguards that comply with legal requirements to protect your nonpublic personal medical and financial information.

Delamar has undertaken an initiative to educate its officers, employees, volunteers and others about HIPAA compliance. This training includes an annual refresher course in privacy and confidentiality.

How We Use Individually Identifiable Health Information

We use medical and financial information to provide and facilitate treatment, collect payment for services and conduct health care operations.

Delamar may, as permitted by law, make discretionary public health disclosures of protected health information if, in its judgment, public safety is at risk.

Delamar may use employee medical and financial information for contacting you to provide information about health-related benefits and services that may be of interest to you. Other uses of your information may require separate written authorizations from you or your dependents.

Dental Insurance

Regular full-time employees may be eligible to enroll in our dental plan. Information and enrollment forms may be obtained from the Human Resources Department.

COBRA

You and/or your covered dependents may have the opportunity to continue medical and/or dental benefits for a period of up to 36 months under the provisions of the Consolidated Omnibus Budget Reconciliation Act (COBRA) when group medical and/or dental coverage for you and/or your covered dependents would otherwise end due to your death or because:

- your employment terminates, for a reason other than gross misconduct; or
- your employment status changes due to a reduction in hours; or
- your child ceases to be a "dependent child" under the terms of the medical and/or dental plan; or
- you become divorced or legally separated; or
- you become entitled to Medicare.

In the event of divorce, legal separation, or a child's loss of dependent status, you or a family member must notify the plan administrator within 60 days of the occurrence of the event.

The plan administrator will notify the individuals eligible for continuation coverage of their right to elect COBRA continuation coverage.

For more information regarding COBRA, you may contact the HR department.

Retirement Benefits

401(k) Qualified Retirement Plan

Delamar provides eligible employees with a 401(k) Qualified Retirement plan which is an excellent means of long-term savings for your retirement. Eligibility for 401k participation is after 6 months of employment. The company's contribution is determined by the employer on an annual basis.

You can obtain a copy of the Summary Plan Description which contains the details of the plan including eligibility and benefit provisions from the HR Department. In the event of any conflict in the description of any plan, the official plan documents, which are available for your review, shall govern. If you have any questions regarding this plan, see the plan administrator.

As with all Delamar benefits, the company reserves the right to amend or terminate the plan at its sole discretion, however, no amendment or plan termination may reduce the amount in your Profit Sharing account.

Section VI: Protecting You and Your Work Environment

Personnel and Medical Records

Personnel and medical files are solely the property of Delamar and are extremely confidential. For your protection, information contained in personnel and medical files is released only in accordance with applicable law.

It is your responsibility to notify the Human Resources Department of changes in your home address, telephone number, marital status, number of dependents, group health and profit sharing plan beneficiary designation, education, etc. Keeping this information up-to-date will help you avoid problems concerning taxes, employee benefits and other important matters.

Privacy Protection Policy

Delamar is committed to maintaining the confidentiality of social security numbers it collects with respect to employees. It is the policy of the Company to protect the confidentiality of social security numbers obtained in the ordinary course of its business. Delamar restricts access to information or documents containing social security numbers to employees who have a legitimate business reason to access such information or documents. No employee of the Delamar community shall knowingly obtain, store, transfer, use, disclose, or dispose of a social security number that the Company obtains or possesses except in accordance with this policy. Each department having access to records containing social security numbers shall determine which personnel within their departments have a legitimate reason in the ordinary course of business to have access to such social security numbers. Personnel using records containing social security numbers must take appropriate steps to secure such records when not in immediate use.

Procedure:

1. Authorized collection and use of social security numbers. This Policy does not prohibit the use of social security numbers where the use is authorized or required by state or federal statute, rule, regulation, or court order or rule, or pursuant to legal discovery or process.

Other legitimate reasons for collecting a social security number include, but are not limited to:

- Applicants for employment may be required to provide a social security number for purposes of a pre-employment background check.
- Copies of social security cards may be obtained for purposes of verifying employee eligibility for employment.

- Social security numbers may be obtained from employees for tax reporting purposes, for new hire reporting or for purposes of enrollment in any employee benefit plans.
- Social security numbers may be obtained from creditors, contractors or vendors for tax reporting purposes.
- Social security numbers may be obtained from employees for benefit payment, to facilitate medical treatment matters and other health care operations.

2. Prohibited use or display of social security numbers.

a. Public Display. A social security number shall not be placed on identification cards, badges, time cards, employee rosters, bulletin boards, permits, licenses or any other materials or documents designed for public display. Documents, materials or computer screens that display all or more than four sequential digits of a social security number shall be kept out of public view at all times.

b. Account Numbers. The social security number as an individual's primary employee number or benefit account number shall not be used unless that use has been approved by the Privacy Officer or Human Resources Department.

c. Mailed Documents. No member of the Delamar community shall mail a document containing the social security number of an employee or any other individual except in the following circumstances:

- State or federal law, rule, regulation, or court order or rule authorizes, permits, or requires that the social security number appear in the document.
- As part of an application or enrollment process initiated by the individual for benefits, governmental assistance or mortgages;
- To establish, confirm the status of, service, amend, or terminate an account, contract, policy, or employee or health insurance benefit, or to confirm the accuracy of a social security number of an individual who has an account, contract, policy, or employee or health insurance benefit.

3. Employee Identification Numbers. Social Security numbers shall not be used as the principle employee time records number.

4. Computer Transmission. No more than four sequential digits of a social security number shall be used or transmitted on the Internet or on a computer system or network unless the connection is secure or the transmission is encrypted.

5. Storage. All documents containing social security numbers shall be stored in a physically secure manner. Social security numbers shall not be stored on computers or other electronic devices that are not secured against unauthorized access.

6. Laptop Computers. All laptop computers which transported off the premises of the Company may not contain social security numbers, protected health information, individualized credit information or tax identification. Social security numbers shall not be stored on computers or other electronic devices that are not secured against unauthorized access.

7. Disposal. Documents containing social security numbers will be retained in accordance with the requirements of state and federal laws and Delamar's record retention policy. At such time as documents containing social security numbers may be disposed of, such disposal shall be accomplished in a manner that protects the confidentiality of the social security numbers, such as shredding.

8. Unauthorized use or disclosure of social security numbers. Delamar shall take reasonable measures to enforce this privacy policy and to correct and prevent the reoccurrence of any known violations. Any employee who knowingly obtains, uses or discloses social security numbers for unlawful purposes or contrary to the requirements of this privacy policy shall be subject to discipline up to and including discharge. Additionally, certain violations of the Act carry criminal and/or civil sanctions. Delamar will cooperate with appropriate law enforcement or administrative agencies in the apprehension and prosecution of any person who knowingly obtains, uses or discloses social security numbers through the Company for unlawful purposes.

Confidential Information of Guests and Clients

The services we provide, as well as the listing of our clients, are confidential. Releasing information regarding clients is prohibited. We are committed to protecting the security and privacy of our guests.

A breach of confidentiality is a violation of company policy and could result in disciplinary action, up to and including termination of employment.

All business records are company property. Removing company records from the company premises without prior approval of management or giving company records to any former employee or non-employee is a serious breach of company policy and will result in termination.

Under no circumstances is an employee allowed to ask a guest for their autograph, or for any other information that would violate their privacy. Guests of our hotel value their privacy, and no hotel employee should violate that.

In the course of your work you may acquire information that is confidential. You are not to discuss this information with other employees or with anyone outside the company.

Even casual conversation with other employees may be overheard and thereby violate our clients' right to privacy. Be particularly careful about your conversation in dining areas and other public gathering places within the company. If you are questioned by anyone, you must say that you are not authorized to discuss the matter and tactfully explain that someone in charge will be glad to talk with the person.

Care of Guest Records

The impression that guests have of our company is based, in part, on the way we care for their records. If we are careless with their files and records, guests may conclude that we have the same attitude toward our technical work. As professionals, we must respect the confidence in which we are entrusted and ensure that guest files are handled with care.

When possible, obtain all material from guest files and then return the material back to the files. Material should be returned in the same condition or better than when it was received.

Under no circumstances will outside requests for guest material be fulfilled unless prior written permission is received from your manager.

Solicitation and Distribution

In order to avoid unnecessary interruptions and to maintain a clean work place, solicitation and distribution must be strictly limited. Solicitation by an employee of another employee is prohibited while either person is on working time. Employee distribution of printed materials is prohibited in work areas or on working time. Trespassing, soliciting or distribution of literature by non-employees on Delamar premises is prohibited at all times.

Company Closings

Delamar maintains the policy of remaining open during bad weather conditions.

Severe weather is to be expected during winter months. Although driving may at times be difficult, when caution is exercised the roads are normally passable. Except in cases of severe storms, we are all expected to work our regular hours. Time taken off due to poor weather conditions while the business remains open is to be used as vacation, a personal day, or is unpaid.

Exempt employees may be provided time off with pay when necessary to comply with state and federal wage and hour laws.

If extreme weather conditions require closing of the building, you will be notified by your manager

Drugs and Alcohol

All employees are expected to come to work in a condition fit to perform their duties.

Delamar strictly prohibits the unlawful manufacture, possession, distribution, transfer, purchase, sale, use, or being under the influence of alcoholic beverages or illegal drugs while on company property, while attending business-related activities, while on duty, or while in possession of, or operating a vehicle while on company business, or machine leased or owned by the company.

You may use physician-prescribed medications provided that the use of such medications does not adversely affect job performance, your safety or the safety of others.

Any employee who violates this policy and/or whose work performance or behavior is adversely affected by the use of drugs or alcohol may be subject to termination of employment.

Delamar reserves the right to request employees to undergo drug or alcohol testing in accordance with all applicable laws and may conduct drug tests for applicants and employees as permitted under law.

Company Equipment and Property

In an effort to promote an efficient and productive work environment, Delamar supplies its employees with items designed to facilitate quality work in an effective and safe environment. It is important for employees to remember, however, that these items are company property and are being furnished to employees for job related purposes. Employees are expected to use these items in the course of their work, and should not use them for personal reasons. Any other use by an employee requires permission from his or her supervisor.

You should remember that Delamar reserves the right to access and inspect, with or without prior announcement, all of its property, including but not limited to vehicles, offices, desks and file cabinets. In addition, Delamar has the right to access and review all computer related communications, including electronic mail, voice mail, internet access, computer files, and electronic devices, as well as any faxes or mail sent to employees at Delamar's address.

In appropriate circumstances, Delamar may also inspect personal possessions brought onto company property, company vehicles and at client worksites. Employees are expected to cooperate in such inspections. The failure to cooperate in inspections may be grounds for disciplinary action, up to and including termination of employment.

For these reasons, Delamar reminds employees that if there is any item of personal property or personal information that they do not want to be subject to disclosure under this policy, the article or information should be left at home and should not be brought onto company premises.

Care in Use

Please keep in mind that employees are expected to exercise care in their use of company property and to use such property for authorized purposes only. The careless use of equipment and supplies can be a safety hazard and/or result in needless waste which diverts company resources from being used for improvements in our hotels, restaurants, equipment, and pay and benefit plans.

Employees are expected to report equipment problems or the need for maintenance immediately. Additionally, employees are expected to use equipment safely and responsibly.

Negligence in accounting for company property, its care or use, the unauthorized removal of company property from the premises, or conversion of company property to personal use may be cause for disciplinary action, up to and including termination of employment.

Electronic Communications

Internet

Access to the Internet has been provided to staff members for the benefit of Delamar and its customers. Every staff member has a responsibility to maintain and enhance the company's public image, and to use the Internet in a productive manner. To ensure that all employees are responsible, productive Internet users and are protecting the company's public image, the following guidelines have been established for using the Internet.

Acceptable Uses of the Internet

Employees accessing the Internet are representing Delamar. All communications should be for professional reasons. Employees are responsible for seeing that the Internet is used in an effective, ethical and lawful manner. Internet chat channels may be used to conduct official company business, or to gain technical or analytical advice. Databases may be accessed for information as needed. E-mail may be used for business contacts.

Unacceptable Use of the Internet

The Internet should not be used for personal gain or advancement of individual views. Solicitation of non-company business, or any use of the Internet for personal gain is strictly prohibited. Use of the Internet must not disrupt the operation of the company network or the networks of other users. It must not interfere with your productivity.

Communications

Each employee is responsible for the content of all text, audio or images that they place or send over the Internet. Fraudulent, harassing or obscene messages are prohibited. All messages communicated on the Internet should have your name attached. No messages will be transmitted under an assumed name. Users may not attempt to obscure the origin of any message. Information published on the Internet should not violate or infringe upon the rights of others. No abusive, profane or offensive language is permitted to be transmitted through the system. Employees who wish to express personal opinions on the Internet are encouraged to obtain their own usernames on other Internet systems.

Software/Applications

To prevent computer viruses from being transmitted through the system, employees will not download or install any software/applications without prior authorization from Human Resources Department.

Copyright Issues

Copyrighted materials belonging to entities other than this company may not be transmitted by staff members on the Internet. Users are not permitted to copy, transfer, rename, add or delete information or programs belonging to other users unless given express permission to do so by the owner or CFO. Failure to observe copyright or license agreements may result in disciplinary action from the company or legal action by the copyright owner.

Security

All messages created, sent or retrieved over the Internet are the property of Delamar and should be considered public information. Delamar reserves the right to access and monitor all messages and files on the computer system as deemed necessary and appropriate. Internet messages are public communication and are not private. All

communications including text and images can be disclosed to law enforcement or other third parties without prior consent of the sender or the receiver.

Harassment

Harassment of any kind is prohibited. No messages with derogatory or inflammatory remarks about an individual or group's sexual orientation, race, gender, religion, political beliefs, national origin, physical attributes, disability, etc. will be transmitted.

E-Mail

Delamar maintains an electronic mail system. This system is provided by Delamar to assist in the conduct of company business.

The electronic mail system hardware is company property. Additionally, all messages composed, sent, or received on the electronic mail system are and remain the property of the company. They are not the private property of any employee.

The use of the electronic mail system is reserved solely for the conduct of business at Delamar. It may not be used for personal business.

The electronic mail system may not be used to solicit or proselytize for commercial ventures, religious or political causes, outside organizations, or other non-job-related solicitations.

The electronic mail system is not to be used to create any offensive or disruptive messages. Among those which are considered offensive, are any messages which contain sexual implications, racial slurs, gender-specific comments, or any other comment that offensively addresses someone's age, sexual orientation, religious or political beliefs, national origin, physical attributes, disability, etc.

The electronic mail system shall not be used to send (upload) or receive (download) copyrighted materials, trade secrets, proprietary financial information, or similar materials without prior authorization.

Delamar reserves and intends to exercise the right to review, audit, intercept, access and disclose all messages created, received or sent over the electronic mail system for any purpose. The contents of electronic mail properly obtained for legitimate business purposes may be disclosed within the company without the permission of the employee.

The confidentiality of any message should not be assumed. Even when a message is erased, it is still possible to retrieve and read that message. Further, the use of passwords for security does not guarantee confidentiality. All passwords must be disclosed to the company or they are invalid and cannot be used.

Notwithstanding the company's right to retrieve and read any electronic mail messages, such messages should be treated as confidential by other employees and accessed only by the intended recipient. Employees are not authorized to retrieve or read any e-mail messages that are not sent to them. Any exception to this policy must receive prior approval by the employer.

Employees shall not use a code, access a file, or retrieve any stored information, unless authorized to do so. Employees should not attempt to gain access to another employee's messages without the latter's permission. All computer pass codes must be provided to supervisors. No pass code may be used that is unknown to Delamar.

Any employees who discover a violation of this policy shall notify their immediate supervisor or the Human Resources Department.

Any employee who violates this policy or uses the electronic mail system for improper purposes shall be subject to discipline, up to and including termination.

Personal Phone Calls

It is important to keep our telephone lines free for guest calls. Although the occasional use of the company's telephones for a personal emergency may be necessary, routine personal calls are not permitted.

Personal cellular telephones must be turned off or set to a silent alert during working hours while on company premises.

Employees are prohibited from using cellular telephones to text message during working hours while on company premises.

Employees are prohibited from using their personal cell phones or any other device to take photographs or videos of any guests.

Cell Phones/Silent Mode

While at work, employees are expected to exercise the same discretion in using personal cellular phones as is expected for the use of company phones. Cell phones must be in either silent mode or turned off while on company premises. Excessive personal calls during the work day, regardless of the phone used, can interfere with employee productivity and be distracting to others. Employees are to make personal calls on non-work time and to ensure that friends and family members are aware of the company's policy. Delamar will not be liable for the loss of personal cellular phones brought into the workplace.

Safety Issues for Cellular Phone Use

Employees whose job responsibilities include regular or occasional driving are expected to refrain from using their phones while driving unless using a hands free device.

Employees who are charged with traffic violations resulting from the use of their phone while driving will be solely responsible for all liabilities that result from such actions.

Tape Recorders, Cameras, and Cell Phones with Camera Capability

Tape Recorders and Cameras are not permitted on the premises. Similarly, the camera component of cell phones may not be used while on the premises.

Violations

Violations of any guidelines listed above may result in disciplinary action, up to and including termination. If necessary Delamar will advise appropriate legal officials of any illegal violations.

Social Media

This social media policy will provide guidance for making appropriate decisions about the work-related content of any postings on social media sites, websites, blogs, postings on video or picture sharing sites, or comments made online. These guidelines allow employees to participate in social media while protecting the privacy, confidentiality, and interests of the organization, its customers and fellow employees.

Our reputation and the confidence of our customers is essential to our success. Information which may appear to be insignificant may have a highly detrimental effect on our physical security, our financial security and the relationship we have with our customers and community.

Please note that this policy applies to the use of social media **at any time, on any computer and/or mobile device**. We respect your privacy and rights outside of the Organization. These guidelines specifically apply to work-related content.

- All confidential, proprietary or sensitive information about Delamar and its customers, business organizations and security methods must be protected all times. Employees are advised to carefully consider their postings to prevent the inadvertent disclosure of confidential organization or customer information.
- If an employee chooses to post a comment regarding Delamar online, it is critical that the employee disclose their affiliation with the Delamar. The employee must also include a disclaimer that the comment reflects their personal opinion, not the opinion of the Delamar. Any identification of Delamar in social communication by or through an employee or former employee will be subject to review by the

organization and may be the basis for termination or lesser disciplinary action regardless of when it is discovered.

- Employees may not conduct business using personal media and may not discuss business matters including such things as rates or offering financial advice online.
- Unless given permission by their manager, employees are not authorized to speak on behalf of Delamar or represent that they do so.
- Use of Delamar's logo or other branding may not be used without the express permission of the organization.
- Discriminatory, defaming, harassing, threatening, derogatory, defamatory and other inappropriate or unlawful statements regarding Delamar, fellow employees, management, Board Members, customers and vendors are strictly prohibited.
- As a reminder, Delamar prohibits employees from accessing personal social networking sites through company computers or using the company's computer system for non-work related activity. This social media policy works in tandem with existing company policies regarding internet access and use during working hours.

Contact with the Media

All media inquiries regarding the company and its operations must be referred to the General Manager and/or Director of Sales & Marketing. Only they are authorized to make or approve public statements on behalf of the company. No employee is authorized to make statements on behalf of or as a representative of the company.

Workplace Threats and Violence

Nothing is more important to Delamar than the safety and security of its employees. Threats, threatening behavior, or acts of violence against employees, clients, visitors, guests, customers or other individuals by anyone on company property or client locations will not be tolerated. Violations of this policy will lead to disciplinary action that may include dismissal, arrest, and prosecution.

Any person who makes threats, exhibits threatening behavior, or engages in violent acts on company property or client locations shall be removed from the premises as quickly as safety permits, and shall remain off premises pending the outcome of an investigation. Upon completion of the investigation, Delamar will initiate an appropriate response. This response may include, but is not limited to, suspension and/or termination of any business

relationship, reassignment of job duties, suspension or termination of employment, and/or criminal prosecution of the person or persons involved.

All company personnel are responsible for notifying a supervisor or the Human Resources Department of any threats that they have witnessed, received, or have been told that another person has witnessed or received. Even without an actual threat, personnel should also report any behavior they have witnessed which they regard as threatening or violent, when that behavior is job related or might be carried out on a company controlled site, or is connected to company employment. Employees are responsible for making this report regardless of the relationship between the individual who initiated the threat or threatening behavior and the person or persons who were threatened or were the focus of the threatening behavior. Any supervisor who becomes aware of threatening behavior must immediately notify the GM and the Human Resources Department.

All individuals who apply for or obtain a protective or restraining order which lists company locations as being protected areas, must provide to their supervisor or the Human Resources Department a copy of the petition and declarations used to seek the order, a copy of any temporary protective or restraining order which is granted, and a copy of any protective or restraining order which is made permanent. Delamar understands the sensitivity of the information requested and has developed confidentiality procedures that recognize and respect the privacy of the reporting employee.

Bullying

Delamar defines bullying as *“repeated inappropriate behavior, either direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment.”* Such behavior is prohibited; employees will be treated with dignity and respect.

Bullying may be intentional or unintentional. However, it must be noted that where an allegation of bullying is made, the intention of the alleged bully is irrelevant, and will not be given consideration when administering discipline. As in sexual harassment, it is the effect of the behavior upon the individual which is important. Delamar considers the following types of behavior examples of bullying:

- **Verbal Bullying:** slandering, ridiculing or maligning a person or his/her family; persistent name calling which is hurtful, insulting or humiliating; using a person as butt of jokes; abusive and offensive remarks.
- **Physical Bullying:** pushing; shoving; kicking; poking; tripping; assault, or threat of physical assault; damage to a person’s work area or property
- **Gesture Bullying:** non-verbal threatening gestures, glances which can convey threatening messages
- **Exclusion:** socially or physically excluding or disregarding a person in work-related activities

Smoking

As a result of our concern for safety and the health of our employees, smoking is permitted in designated smoking areas outside of the premises and not permitted in the company buildings or at any client location. Excessive smoking breaks are not permitted.

Building Access

Employees may only be on the company property during their regularly scheduled work hours or as specifically authorized by management.

Terminated employees are not allowed on any premises of Delamar.

Dress Code

Employees are required to dress appropriately during working hours. Employees are expected to represent Delamar while at client sites and outside the organization in a manner of dress which is mature and appropriate for the client setting.

A well-groomed personal appearance is important in making a favorable impression on our guests. Good personal hygiene is essential. Therefore, it is expected that employees will:

- Bathe and use underarm deodorant daily;
- Brush teeth daily and use mouthwash as necessary;
- Refrain from using scented perfumes and/or colognes while working.

Employees who believe a reasonable accommodation to this policy should be granted based on religion, disability or other grounds protected by applicable law should feel free to discuss the matter with their supervisor. Reasonable accommodation will be granted unless it would cause an undue hardship on the employer or other business circumstances warrant.

Employees who come to work in dress that management believes to be inappropriate will be sent home to change. Any time lost by non-exempt employees as the result of this will not be paid.

Nails:

Fingernails must be clean and well-trimmed. Chipped nail polish must be removed before you come to work and bright colored nails are not permitted.

Makeup/tattoos:

Makeup should be moderate. Exaggerated cosmetics and colors are not permitted. No visible tattoos are allowed.

Jewelry:

Jewelry should be kept to a minimum; i.e. a single watch and one ring. Women are asked to wear only single stud earrings. Men are not permitted to wear earrings. Other visible

body piercings are not permitted. Chains should be worn inside the uniform. Bracelets cannot exceed 1/2 inch in width.

Uniforms:

Each department has uniform requirements and your manager will provide specific dress codes that apply to the individual department. All clothing worn should be neat, clean and pressed. Shoes should be clean, polished, and in good condition. No open-toed shoes are allowed, and heels cannot exceed 2.5 inches. Skirt length cannot be more than 1 inch above the knee.

If you are issued a Uniform it must be turned into your supervisor upon termination or personal leave. Non-uniformed employees are to wear appropriate business attire and accessories that complement the hotel's design and style.

Nametags:

Nametags are issued to all employees and are to be worn and easily visible at all times in the workplace. Violations of this policy will result in disciplinary action. If you lose your nametag, report the loss immediately to your manager for a replacement. You will receive 2 complimentary nametags; for any more replacements kindly contact your supervisor.

Good Housekeeping

Good work habits and a neat place to work are essential for job safety and efficiency. You are expected to keep your place of work organized and materials in good order at all times. Report anything that needs repair or replacement to your manager.

Health and Safety Concerns

Safety Practices

Delamar has a continual objective of providing employees with a safe and healthy work environment. The safety of our employees is of primary concern. It is important that any potentially unsafe conditions are reported immediately and that each employee recognizes that health and safety is a responsibility that is shared by all.

All employees are required to use safety equipment furnished for their particular job situation and must follow safe work practices and help create safe working conditions at all times.

All employees must observe the following minimum safety practices:

- 1. Fire Policies and First Aid Measures Must Be Observed.** All personnel are to learn the fire safety procedures and first aid measures in the company locations and to follow them.

2. **Employees should advise their supervisors or the Human Resources Department of any special emergency procedures that are needed for them.** In the event that an employee requires special medical emergency treatment measures or precautions, he or she should advise their supervisor or the Human Resources Department. The underlying medical condition need not be disclosed and any medical information will be treated as strictly confidential
3. **All employees must report for duty in a fit condition.** The prerequisite for every job at Delamar is that the employee reports for work in a condition fit for duty. If the employee is not fit for duty, the employee may be asked to provide a medical certification of the ability to work and/or denied employment without pay.
4. **All employees who drive as part of their work must advise the company of any change in their license status or ability to operate a motor vehicle.** The safety of our employees and the public is our foremost concern. Any change in the authorization to drive or the ability to drive must be reported to your supervisor or company officer immediately.
5. **The use of alcoholic beverages and illegal substances during working hours will not be tolerated.** The possession of alcoholic beverages and/or illegal substances on company premises is forbidden and subject to immediate termination.
6. **Understand your job fully and follow instructions.** If you are not sure of the correct, safe procedure, ask your manager. Get help when lifting or pushing heavy objects and follow proper lifting procedures.

In An Emergency

Your manager should be notified immediately when an emergency occurs. Emergencies include all accidents, medical situations, bomb threats, other threats of violence, and the smell of smoke. If your manager is unavailable, contact the nearest company official.

Should an emergency result in the need to communicate information to employees outside of business hours, your manager will contact you. Therefore, it is important that employees keep their personal emergency contact information up to date. Notify your manager when this information changes.

When events warrant an evacuation of the building, you should follow the instructions of your manager or any other member of management. You should leave the building in a quick and orderly manner. You should assemble at the pre-determined location as communicated to you by your manager to await further instructions or information.

Please direct any questions you may have about the company's emergency procedures to your manager.

Job Related Accidents and Illnesses

If you are injured during working hours, our first concern is to ensure that you receive appropriate medical attention. As soon as possible, you should report the accident to your supervisor who will complete an Incident Report. If you are unable to report the accident due to the extent of your injuries, any other employee who discovers or observes the accident is responsible for reporting the event to the appropriate supervisor.

All accidents, no matter how apparently insignificant, must be reported immediately. It is imperative, when possible, to report these accidents or injuries to a manager within three (3) days. You should be aware that the failure to immediately report a work-related accident or injury might jeopardize your ability to collect workers' compensation benefits.

Rules of Conduct

Every organization involving people has to have rules of conduct if it is to survive. While it is impossible to have a list of rules to cover all situations that might arise, listed below are illustrations of some of the conduct that is not acceptable. While this list is not complete, it serves to illustrate the types of infractions that may subject employees to termination, suspension, or warnings.

Note that all employees remain employees-at-will and may be terminated with or without cause or notice.

- Irregular attendance; repeated tardiness
- Inefficiency or negligence in performing job duties
- Permitting avoidable waste of material or supplies; carelessness; poor workmanship
- Violation of health, housekeeping or safety rules, including littering grounds or work areas
- Visiting, loitering, sleeping, loafing during working time; disturbing other employees at work
- Boisterous or disruptive activity in the workplace including engaging in gossip, spreading of rumors, horseplay, and the use of obscene, abusive, or offensive language

- Unauthorized solicitation of employees on behalf of any merchant, club, individual society, organization, political party, or religious group during working time, whether for membership, subscription, or payment of money
- Repeated failure to properly complete time cards
- Unauthorized posting, removing, or defacing material from bulletin boards
- Completing another employee's time record; altering any time record
- Creating a disturbance; fighting
- Threatening a customer, co-worker, or any other employee
- Gambling on company property
- Falsifying company records
- Destroying or defacing company property
- Arriving at work under the influence of alcohol or illegal drugs; the use, sale or dispensing of drugs or alcohol on company premises; reporting to work in a manner unfit to perform work duties
- Insubordination including refusing to obey directions to work in a temporary capacity or in another position
- Walking off the job during working hours or leaving the company premises without permission
- Smoking in prohibited areas
- Violations of the company privacy policy or the federal rules privacy rules covering our group health plan
- Theft of company or personal property; failing to conduct or maintain inventories
- Possession or use of firearms, lethal devices, knives, martial arts equipment, or other weapons on company premises or in the course of performing company duties
- Other conduct which interferes with, or is contrary to, the objectives of the company, its operation or reputation, or creates the appearance of impropriety

Section VII: If You Leave Us

Termination of Employment

Employee terminations are generally classified as voluntary (initiated by the employee) or involuntary (initiated by the company). Employees who voluntarily terminate their employment are asked to give two weeks prior written notice. Your thoughtfulness is appreciated and will be noted favorably should you ever wish to reapply for employment with Delamar. Voluntarily terminating employees will be given their final paycheck at the next regularly scheduled payday.

Employees, who are rehired following a break in service, other than an approved leave of absence, must serve a new initial introductory period whether or not such a period was previously completed. Such employees are considered new employees from the effective date of their reemployment for all purposes, including the purposes of measuring benefits.

Employees who are involuntarily terminated will be given their final paycheck at the next regularly scheduled payday.

Upon termination, employees must return any company property in their possession, including this employee handbook, uniform, vehicles, cellphones, handheld transceivers, computers, fax machines, tools, parts, etc. and a range of computer equipment and components supplied by the company. These items must be returned promptly or appropriate legal action will be taken.

You should notify the company if your address changes during the calendar year in which discharge occurs so that your tax information will be sent to the proper address.

References

All requests for references must go through the Human Resources Department. It is Delamar's general practice to verify only the dates of employment and position held.

ACKNOWLEDGMENT OF RECEIPT OF EMPLOYEE HANDBOOK

This handbook is presented to provide you with information about your employment with Delamar. It has been prepared as a guide and reference only. This employee handbook is not a contract either express or implied. Delamar adheres to the policy of **employment-at-will**, which means that **either you or Delamar may terminate your employment at any time, for any reason, with or without cause and with or without notice.**

Delamar reserves the right to revise, discontinue, suspend or modify any of the policies contained in this handbook at any time and at its sole discretion. Delamar's policy of employment-at-will, however, may only be modified by a formal contract, signed by both the employee and the CFO/VP of Operations, evidencing the company's intent to enter into a contract of employment.

I, _____, have received a copy of Delamar's employee handbook. I understand that it is my responsibility to read it and to understand the policies outlined within it. I also understand that this handbook is not intended to serve as a contract either express or implied and that Delamar has the right to revise, discontinue, suspend or modify any of the policies contained in this handbook at any time at its sole discretion and that all such changes will be binding upon all employees.

I further understand that my employment with Delamar is at-will, for no definite period of time.

Employee Signature

Date