

TRINITY EMS, Inc.
Policies & Procedures Handbook

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PURPOSE

This Handbook is designed to help employees get acquainted with TRINITY EMS, Inc. (hereinafter “TRINITY”) It describes the basic terms and conditions of your employment and is intended to serve as your personal resource and reference guide throughout your employment at TRINITY. Employees are expected to read this Handbook carefully, and to know and understand its contents. Please feel free to speak with the Human Resources (HR) Manager regarding any questions you may have and he/ she will provide you with further explanations of any information contained in this Handbook.

Employee policies, procedures, benefits, services, and activities have been highlighted for you. This Handbook contains information from more detailed sources and is not intended to supersede policy documents or benefit plan descriptions, which are available for review upon request. This Handbook replaces all previous handbooks which you may have received during your employment at TRINITY

TRINITY reserves the right to make changes to this Handbook, and to any employment policy, practice, work rule, or benefit, at its sole discretion, at any time and without prior notice. Conflicting provisions of new or revised policies, procedures, and benefit plans always take precedence over the current contents of this Handbook. Employees are responsible for knowing about and understanding those changes once they have been disseminated. TRINITY also reserves the right to interpret the provisions of this handbook. For this reason, employees should check with the Human Resources Manager to obtain information regarding specific employment guidelines, practices, policies, or procedures.

This Handbook, and the material it contains, is not intended nor should it be construed to constitute an employment contract of any kind between employees and TRINITY.

All employment at TRINITY is on an “at will” basis and as such you or Trinity may terminate the employment relationship at any time and for any reason. No employee or Trinity representative other than John Chemaly and/or Gary Sepe has the authority to change the “at will” employment relationship or to contract with any employee for different terms of employment. Furthermore, your “at will” employment relationship can only be changed by a written contract signed by John Chemaly and/or Gary Sepe and the employee. Nothing in this Handbook constitutes a contract or promise of continued employment.

This handbook is the property of TRINITY and it is intended for the personal use and reference by employees of TRINITY. Circulation of this Handbook outside of Trinity requires the prior written approval of the Human Resources Manager.

Section 1

Introduction

Welcome to the Team!

Starting a new job is exciting, but at times can be overwhelming. This employee Handbook has been developed to help you get acquainted and answer many of your initial questions.

As an employee of TRINITY, the importance of your contribution cannot be overstated. Our goal is to provide the finest quality services to every patient who has been entrusted to our care.

You are an important part of this process since your work directly influences our Trinity's reputation.

We are glad you have joined us, and we hope you will find your work to be both challenging and rewarding.

Sincerely,

John Chemaly
President

Gary Sepe
Vice President

TRINITY EMS, Inc. History

TRINITY was started in Lowell Massachusetts in 1991 by John Chemaly and Gary Sepe, two local professionals with over 50 years of EMS and healthcare experience between them. Today, TRINITY is an industry leader and uniquely qualified Emergency Medical Service provider because of the vision, dedication and values provided by the owners and our management team.

State-Of-The-Art-Technology

The experience and dedication of the owners and management team is only half the equation. Our advanced technology sets TRINITY apart from the competition and leads us into the future. Our digital communications center is state of the art and it greatly enhances our ability to dispatch vehicles and service our clientele. TRINITY was one of the first to adapt the RightCad-Sanitas Technology, which integrates our dispatching and billing systems. TRINITY'S ambulances are also equipped with Toughbook Tablet computers, which can instantly provide everything from directions to vital patient information. We also implemented Dispatch Pro, Pro-QA, GPS and Navigator.

Complete Customer Satisfaction

All of this technology, our experience, and everything we do is committed to one simple end: the total satisfaction of our customers and patients. This is the model which drives us to excellence. We believe there is no better choice for your Emergency Medical Service provider than TRINITY.

We Respond To You.

Mission

TRINITY, headquartered in Lowell, Massachusetts, is a Massachusetts and New Hampshire licensed Ambulance service, which maintains both Advanced Life Support (ALS) and Basic Life Support (BLS) licenses. TRINITY is locally owned, operated and committed to providing superior emergent and non-emergent medical transport services to the residents and communities we serve. At TRINITY, we firmly believe it is our responsibility to be a good corporate citizen and to help improve the quality of life for our patients and customers. That same responsibility extends to our employees. We believe in the value of creating a work environment in which our employees have the opportunity to grow and prosper as health care professionals while giving back to the communities we serve.

Vision

We are committed to providing the best possible climate for maximum development and the achievement of goals for our employees. Our practice has always been to treat each employee as an individual. We have always sought to develop a spirit of teamwork; and we see our employees as individuals working together to attain a common goal.

In order to maintain an atmosphere where these goals can be accomplished, we have provided a workplace that is comfortable and progressive. Most importantly, we have a workplace where communications are open and problems can be discussed and resolved in a mutually respectful atmosphere. We do take into account individual circumstances and to the extent possible the individual employee in order to ensure that our clientele and patients receive the best emergent and transportation medical services.

We firmly believe by our communicating with each other directly, we can continue to resolve any difficulties that may arise and develop a mutually beneficial relationship.

EQUAL EMPLOYMENT OPPORTUNITY POLICY

I. Non-Discrimination in Employment

TRINITY prohibits discrimination in employment on the basis of:

- Age (40 and above),
- Criminal record (applications only),
- Physical, mental, or psychiatric disability,
- Genetics (results of genetic testing),
- Maternity leave, Pregnancy or pregnancy related conditions
- National origin or ancestry,
- Race or color,
- Religion,
- Sex,
- Sexual orientation, or

- Active military status.

Unlawful discrimination of employees occurring in the workplace or in other settings in which employees may find themselves in connection with their employment will not be tolerated by TRINITY. Further, any retaliation against an individual who has formally or informally complained about discrimination or has cooperated with an investigation of a discrimination complaint is prohibited. To achieve our goal of providing a workplace free from discrimination, the conduct that is described in this policy will not be tolerated, and TRINITY will implement the procedure described below to address any potential inappropriate conduct.

TRINITY commits itself and its employees, within the context of state and federal civil rights laws, to ensure equitable participation of employees of all backgrounds in all of its daily operations.

This policy applies to all employment practices and employment programs sponsored by TRINITY. This policy shall apply, but not be limited to, the areas of:

- Recruitment,
- Selection,
- Compensation and benefits,
- Professional development and training,
- Reasonable accommodation for disabilities or religious practices,
- Promotion,
- Transfer,
- Termination,
- Layoff, and
- Other terms and conditions of employment.

Because TRINITY takes allegations of discrimination seriously, TRINITY will respond promptly to complaints and where it is determined that inappropriate conduct has occurred, TRINITY will act promptly to eliminate the conduct and impose any necessary corrective action, including disciplinary action.

II. Discriminatory Harassment

TRINITY's separate Harassment Policy details our commitment to a workplace free of any verbal or physical conduct which is unwelcome, severe or pervasive, and related to membership or perceived membership in a protected class.

III. Reasonable Accommodation

Employees seeking reasonable accommodations may submit their request in writing to the Human Resources Manager, 1221 Westford Street, Lowell, MA 01853.

IV. Discrimination Complaints

If any of TRINITY's employees believes that he/she has been subjected to unlawful discrimination, the employee has the right to file a complaint with TRINITY. This may be done in writing or verbally.

If you would like to file a complaint you may do so by contacting the Human Resources Manager, 1221 Westford Street, Lowell, MA 01853, 978-441-9191. The Human Resources Manager is also available to discuss any concerns you may have, and to provide information to you about our Equal Employment Opportunity policy and our complaint process. Alternatively, employees may contact their supervisor.

V. Discrimination Investigation

TRINITY will promptly investigate the allegation in a fair and thorough manner. The investigation will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances. The investigation will include private interviews with the person filing the complaint, the person alleged to have committed the discrimination, and relevant witnesses. When TRINITY has finished its investigation, it will, to the extent appropriate, inform the person filing the complaint and the person alleged to have committed the conduct of the results of that investigation. If it is determined that inappropriate conduct has occurred, TRINITY will act promptly to eliminate the offending conduct, and where it is appropriate TRINITY will also impose disciplinary action.

VI. Disciplinary Action.

If it is determined that inappropriate conduct has been committed by one of TRINITY's employees, TRINITY will take such action as is appropriate under the circumstances. Such action may include counseling, verbal or written warning, suspension or termination.

VII. State and Federal Remedies

In addition to the above, if you believe you have been subjected to unlawful discrimination, you may file a formal complaint with either or both of the government agencies set forth below. Using TRINITY's complaint process does not prohibit you from filing a complaint with these agencies. Each of the agencies has a time period of 300 days for filing a claim.

1. The United States Equal Employment Opportunity Commission (EEOC):
One Congress Street, 10th Floor, Boston, MA 02114.
2. The Massachusetts Commission Against Discrimination (MCAD):

Boston Office: One Ashburton Place, Rm. 601, Boston, MA 02108.

Pursuant thereto, this policy establishes-effective immediately and in compliance with regulations provided by the Secretary of Labor in 41 CFR Chapter 60-an affirmative action program composed of specific steps that will be undertaken in order to implement this policy.

Procedure and Laws:

A definition of and expectation of responsibilities regarding each act are listed below:

1. **Title VII of the 1964 Civil Rights Act:** no employee shall engage in any discrimination based on race, color, religion, sex or national origin. Specifically, it states that it shall be an unlawful employment practice:
 - a. To fail or refuse to hire or to discharge an individual or otherwise to discriminate against any individual with respect to his/her compensation, terms, conditions or privileges of employment, because of such individual's race, color, religion, sex or national origin.
 - b. To limit, segregate, or classify his/her employees or applicants for employment in any way that would deprive or tend to deprive any individual of employment opportunities or otherwise adversely affect his/her status as an employee, because of such individual's race, color, religion, sex or national origin.
 - c. Title VII bars discrimination on the part of most employers, including all public or private employers of 15 or more persons.
2. **Equal Pay Act of 1963:** (amended in 1972), makes it unlawful to discriminate in pay on the basis of sex when jobs involve equal work; require equivalent skills, effort, and responsibility; and are performed under similar working conditions. Differences based on a seniority system, a merit system, a system that measures earnings by quantity or quality of production, or based on any factor other than sex do not violate the Act.
3. **Age Discrimination in Employment Act of 1967:** (ADEA) makes it unlawful to discriminate against employees or applicants for employment who are between 40 and 65 years of age.
4. **Vocational Rehabilitation Act of 1973:** requires employers with federal contracts of \$2,500 to take affirmative action in employing handicapped persons. It does not require hiring an unqualified person. It does require an employer to take steps to accommodate a handicapped worker unless doing so imposes an undue hardship on the employer.
5. **Vietnam Era Veterans' Readjustment Assistance Act of 1974:** require that employers with government contracts of \$10,000 or more take affirmative action to employ and advance disabled veterans and qualified veterans of the Vietnam era.
6. **Pregnancy Discrimination Act of 1978:** (amendment of Title VII) prohibits using pregnancy, childbirth, or related medical conditions to discriminate in hiring, promotion, suspension, or discharge, or any term or condition of employment.

- a. **Under the Massachusetts Pregnant Workers Fairness Act**, all Massachusetts employers are required to accommodate all pregnant workers the same as they would any employee with a disability. In addition, employers engage in a timely, good faith and interactive process to determine if an effective, reasonable accommodation which would enable the employee or prospective employee to perform the essential functions of the employee's job or the position to which the prospective employee has applied.
 - b. Trinity will provide all employees a notice of their rights under this law at the time of hire and again within ten (10) days of being notified of an employee's pregnancy.
 - c. **Nursing/Lactating Protections:** Trinity will engage in the interactive process to discuss the needs of employees who are lactating/breast feeding to determine what reasonable accommodations, if any, the employee requires. Employees who are lactating or who need to express breast milk during working hours will be provided with reasonable break periods during which the employee may express breast milk. Trinity will provide an employee with a secure location (not a restroom) for the purposes of expressing breast milk. This room will be:
 - Locking from the inside
 - Shielded from view
 - Close to an electrical outlet
 - Privacy sign (if desired)
 - Free from intrusion by co-workers
 - d. Employees who are lactating/breastfeeding and who wish to express breastmilk need to notify the HR Department in writing to ensure Trinity can work with the employee to determine what reasonable accommodations the employee will require. Upon receiving notification from the employee, Trinity will engage in a good faith interactive process to determine what accommodations can reasonably be provided to the employee to ensure that the employee can express breast milk.
7. **Sexual Harassment:** (see separate policy and procedure).
 8. **Federal Violence Against Women Act of 1994:** provides another avenue women can use to seek relief for violent sexual harassment. It provides that a person "who commits a crime of violence motivated by gender and thus deprives another" of her rights shall be liable to the party injured.
 9. **The Americans with Disabilities Act:** (ADA 1990), prohibits employment discrimination against qualified disabled individuals. No employee shall discriminate against qualified individuals with disabilities with regard to applications, hiring, discharge, compensation, advancement, training or other terms, conditions, or privileges of employment. Also, "reasonable accommodations" must be made for physical or mental limitations unless doing so imposes an "undue hardship" on the business.

- a. **AIDS:** The EEOC’s position is that the ADA prohibits discriminating against people with HIV/AIDS, and numerous state laws also protect people with AIDS from discrimination. The Labor Department’s Office of Federal Contract Compliance Programs requires treating AIDS-type diseases under the Vocational Rehabilitation Act, (see above).
- b. **Qualified Individuals:** Simply being disabled doesn’t qualify someone for employment. Those who, with (or without) a reasonable accommodation, can carry out the *essential functions* of the job. The individual must have the requisite skills, educational background, and experience to do the job. A function is essential when, for instance, it is the reason the position exists, or it is so highly specialized that the person is hired for his or her expertise or ability to perform that particular function.
- c. **Reasonable Accommodation:** If the individual can’t perform the job as currently structured, the employer must make a “reasonable accommodation” unless doing so would present an “undue hardship.” Reasonable accommodation might include redesigning the job, modifying work schedules, or modifying or acquiring equipment or other devices to assist the person.
- d. **Mental Impairments and the ADA:** “mental impairment” includes “any mental or psychological disorder, such as...emotional or mental illness.” Examples include major depression, anxiety disorders, panic disorders, obsessive-compulsive disorder, and personality disorders. The guidelines basically say employers should be alert to the possibility that traits normally regarded as undesirable (such as chronic lateness, hostility to co-workers, or poor judgment) may be linked to mental impairments covered by the ADA. Reasonable accommodation, says the EEOC, might then include providing room dividers, partitions, or other barriers between work spaces to accommodate individuals who have disability related limitations.

10. USERRA (The Uniformed Services Employment and Reemployment Rights Act of 1994, is a federal law that establishes various rights and benefits for employees and applicants for employment who have served in the military or have engaged in other forms of protected governmental service.

Please refer to the Human Resource Department for a detailed definition or recommendation. Of course each matter may be based on a case-by-case basis.

Privacy and Confidentiality Policy (as it pertains to our Clients)

TRINITY is committed to holding in strict confidence all confidential information relating to TRINITY, its affiliates, and their respective patients, colleagues, students and contract personnel in compliance with federal and local laws 201 CMR 17.00 *et seq.* Given the nature of TRINITY’s business, protecting Confidential and Personal Information is of vital concern to TRINITY. This information is one of TRINITY’s most important assets. It enhances TRINITY’s opportunities for future growth and indirectly adds to the job security of all employees. For the purpose of this policy “we” collectively refers to TRINITY, its affiliates and all individuals subject to the Confidentiality Agreement. We have a legal and ethical responsibility to prevent access to and disclosure of “patient protected health information”, other confidential patient, employee, student contract personnel and

non-public institutional information as well as proprietary information without proper authorization or for unauthorized purposes.

We understand that “patient protected health information” is confidential and that TRINITY is committed to protecting such information. We understand at TRINITY, certain employees need to have access to particular confidential information to do their jobs and that unless restricted by specific laws, these employees may use “patient protected health information” that is capable of identifying individual patients for the purposes of treatment, payment, and health care operations, in most cases without patient written permission. We understand that as required by law, such TRINITY employees who have a need to access particular confidential information to do their jobs have a duty of confidence and must make sure that protected health information that identifies a patient is kept private.

We understand that TRINITY uses patient protected health information to create a record of each patient receiving emergency medical services and medical transportation and that this information is needed to provide patients with quality care and to comply with certain legal requirements. We understand that there are a few specific times when laws or regulations require or allow TRINITY to share patient protected health information outside TRINITY and the hospitals it serves without written authorization. Examples of when patient protected health information may be disclosed outside TRINITY without written authorization from a patient includes, but is not limited to:

- When it is required by law;
- For public health activities;
- For victims of abuse, neglect or domestic violence;
- For health oversight activities;
- For law enforcement purposes;
- For coroners/medical examiners;
- For research that meets all state and federal requirements;
- To comply with federal grant requirements;
- For military and veterans;
- In response to a medical emergency;
- For national security activities; or
- For workers’ compensation

We understand that information classified as confidential includes patient protected health information, all medical, personal or other information about a patient, colleague, student, or contract personnel, as well as non-public information about TRINITY, and its affiliates. This information includes, but is not limited to:

- Written correspondence and fax, email or other electronic communication;
- Demographic data, e.g. address, age, telephone number, employer, etc.;
- Insurance information;
- Administrative and financial data;
- Employment records of all current or former employees;
- Notes, letters, reports concerning the examination, treatment and observation of patients;

- Patient lists and reports;
- Research data, and;
- Company financial and business information.

We understand that the foregoing information is considered confidential, regardless of the format in which it appears (written, verbal, computer or other electronic media, observation), the manner in which such information is received, or whether it is received purposefully or inadvertently.

We understand that access is limited to only that information which is necessary to perform our job. We understand that we do not have the right, apart from performing our duties to access confidential information of any patient, colleague, student or contract personnel, including my spouse, other family members, co-workers or friends, without written authorization by those individuals. We understand that if our duties require knowledge of or access to confidential information about people we know, we understand that we will be prohibited from discussing our knowledge of the information with those people.

We understand that we may disclose confidential information only to persons authorized to receive it and in a manner that will prevent disclosure to anyone other than the person(s) for whom it was intended. We must not leave confidential information in an area where unauthorized persons could view it.

We understand that we must report to an appropriate member of management any situation that we believe may violate patient, colleague, student, contract personnel or institutional confidentiality.

We understand that any computer password and/or log-in code assigned personally must be kept confidential and must not be shared with anyone, whether or not that other person has his/her own password and/or log-in. We understand that any disclosure of personal computer password or log-in code which risks unauthorized access to confidential information will be considered a breach of confidentiality. It is our responsibility to ensure that unauthorized persons do not in any way gain access to password-protected computer information. In the event a TRINITY employee learns that any password and/or log-in information has been compromised, the same must be reported to an appropriate member of the management team immediately.

In the event that we have a question as to whether we are authorized to access certain information or whether we should access or disclose information in a particular circumstance, we understand we must contact an appropriate member of management for guidance.

We understand that this Privacy and Confidentiality Policy should not be interpreted to limit employees in the exercise of their rights under the National Labor Relations Act.

We understand that any violation of confidentiality whether intentional or not, may result in disciplinary action, up to and including immediate termination. We may also be subject to further legal action.

False Claims and Whistleblower Protections

It is the policy of TRINITY to comply with all federal and state laws and regulations to ensure that its billing to the Medicare program, the Massachusetts Medicaid program and other federal and state health care programs is accurate and in full conformity with applicable laws. In furtherance of this commitment, TRINITY encourages employees to contact the Director of Accounts Receivable with any compliance questions or concerns or to report any suspected fraud or abuse. TRINITY also will conduct regular audits throughout Trinity to ensure compliance with proper billing practices.

The Federal False Claims Act, the Federal Program Fraud Civil Remedies Act and certain Massachusetts laws prohibit the knowing submission of false claims or statements to the government for payment. Although they differ in their specific detail, these laws define false claims as knowingly submitting false or fraudulent claims for payment to the federal or state government or failing to disclose the occurrence of events that affect the right to benefits. Examples of false claims could include billing for services not rendered or goods not provided, falsifying certificates of medical necessity, falsifying medical records, unauthorized use or unauthorized assignment of provider billing numbers and failing to report overpayments to credit balances. Violations of these laws can subject TRINITY to significant fines and penalties.

The laws that prohibit the submission of false claims impose an affirmative obligation on TRINITY and its employees, agents and contractors to know and to understand the rules and regulations regarding the submission of claims. TRINITY makes it a part of the duty of all employees to report any potential improprieties directly to their managers or the Director of Accounts Receivable without fear of retaliation. Consistent with these statutes, any person may, under certain circumstances, become a whistleblower and notify the government, if he or she believes TRINITY is not responding appropriately to reports of problems or concerns. TRINITY is prohibited from taking any adverse action against persons who notify the federal government of potential violations, who aid another in doing so, or who participate in the investigation of an alleged violation.

TRINITY has set forth detailed information about the provisions of the Federal False Claims Act, the Federal Program Fraud Civil Remedies Act and Massachusetts civil and criminal state laws pertaining to false claims and statements. For more information about these laws, please contact the Director of Accounts Receivable.

Protecting Company Information

Protecting our company's information is the responsibility of every employee, and we all share a common interest in making sure it is not accidentally or improperly disclosed. Do not discuss Trinity's confidential business with anyone who does not work for us.

Media Inquiries

In the event that media personnel, reporters or other individuals are looking for information, the employee should direct them to contact the President, Vice President or the Director of Business Development. Employees are forbidden to speak to any member of the press concerning Trinity operation(s), employees, or patient contacts unless expressly authorized by the President, Vice

President or the Director of Business Development. This policy should not be interpreted to limit employees in the exercise of their legal rights to discuss the terms and conditions of their employment under any federal or state laws, including the National Labor Relations Act.

Legal Inquiries

It is TRINITY's policy to cooperate reasonably with federal, state, and local government(s) in connection with investigations or other inquiries regarding the business activities of TRINITY. Responses to all governmental investigations or inquiries regarding the business activities of TRINITY, written or oral, shall be the responsibility of the President, or Vice President of TRINITY who will oversee the handling of these matters in conjunction with advice from TRINITY's legal counsel.

This policy shall apply to everyone at TRINITY, including all officers, directors and employees ("TRINITY Personnel").

The objective of this policy is to ensure reasonable compliance with all government investigations and inquiries in a timely, coordinated and organized manner.

In response to any investigation or inquiry request regarding the business activities of TRINITY made by any department or representative of the federal, state or local government, TRINITY Personnel shall take the following steps:

1. If the inquiry is made in writing (by subpoena or otherwise), immediately forward the written inquiry to TRINITY's President or Vice President.
2. If the inquiry is made orally or by phone:
 - a. Obtain the name, title and contact information of the person making the inquiry ("the investigator");
 - b. Inform the investigator that the President or Vice President is responsible for responding to all governmental inquiries and that you will provide the President or Vice President with the investigator's contact information; and
 - c. Immediately, notify the President or Vice President of the investigator's inquiry.

Verification of Employment Eligibility

In compliance with the Immigration Reform and Control Act of 1986, TRINITY requires all new hires, at the commencement of employment, to produce original documentation establishing their identity and right to work in the United States, and complete INS Form I-9, swearing that they have a right to work in the United States. All documents must be unexpired. Documentation must be produced within three business days of hire, or on the first day of any employment that is less than three business days.

Mandated Reporting

EMT's and Paramedics are required by law to report all cases of suspected or actual abuse/or neglect of children and elderly. An oral report must be made immediately and a written report within 48 hours. Child abuse cases must be reported to the Department of Social Services Children and Family Services and elder abuse must be reported to the Department of Elder Affairs. Report forms are available from those agencies. EMT's and Paramedics are required to report all suspected cases of abuse or neglect even if they believe that other healthcare professionals or public safety agencies are reporting the case. Failure to report cases involving children is punishable by a fine up to one thousand dollars (\$1,000). All mandated reporters who knowingly and willfully file a frivolous report can be punished and fined up to two thousand dollars (\$2,000), for 1st offense, 6 months in jail, 2nd offense 2.5 years in jail and 3rd offense failure to report resulting in serious bodily injury or death, up to five thousand dollar (\$5,000) fine, 2.5 years in jail and is reportable to OEMS. All EMT's upon recertification must attest that they are aware of this law. For further information contact the Department of Children and Families or the Department of Elder Affairs.

Drug Free Workplace Policy

TRINITY is committed to maintaining a drug-free, healthful and safe workplace. To promote this goal, employees are required to report to work in appropriate mental and physical condition to safely and effectively perform their duties. The use, possession, sale, manufacture or transfer of illegal drugs, on or off the job, will be cause for immediate termination of employment. If an employee reports to work under the influence of alcohol or consumes alcohol while on duty, or off duty while on company property, or at any time while wearing any portion of a TRINITY uniform, disciplinary action may be taken, up to and including termination. The use of alcohol or illegal drugs during non-working time or in situations where the employee is not conducting activities on behalf of TRINITY is also prohibited if such use adversely affects the employee's work or performance, his or her safety, the safety of co-workers or clients, or TRINITY's reputation and/or integrity.

The legal use of prescribed drugs is permitted on the job only if it does not impair an employee's ability to perform the essential functions of his or her job, with or without reasonable accommodation, in a safe manner that does not endanger the employee, or patients or other individuals in the workplace.

The following are the procedures that shall be implemented to ensure compliance with the previously stated policies:

- 1) All applicants for employment shall be required to submit to drug testing before an offer of employment. Employment will not be offered to any applicant who refuses to submit to the drug test, tampers with, or attempts to substitute urine samples. Employment will not be offered to applicants who test positive for the following substances:
 - a. Amphetamines
 - b. Barbiturates
 - c. Benzodiazepines

- d. Cocaine
- e. Marijuana
- f. Methadone
- g. Methaqualone
- h. Opiates
- i. Phencyclidine
- j. Propoxyphene
- k. Ecstasy
- l. Fentanyl

At the discretion of TRINITY the above list of substances may be altered depending on individual circumstance. Trinity will utilize a Medical Review Officer (MRO) to ensure that any substance identified in the drug screen is being prescribed and used as directed by a licensed healthcare professional under an appropriate treatment plan.

In addition, those employees returning from a Leave of Absence or have been deemed responsible for MVA may be required to complete a drug screening prior to returning to work.

- 2) Drug testing will be performed by a company designated provider or service. The screening procedure, along with test results, will be held confidential.

Violation of the Drug-Free Workplace policy may result in discipline, up to and including termination of employment.

Any employee who is found guilty, or who pleads no contest to a charge of violating a criminal statute involving the manufacturing, distribution, dispensing, possession or use of any controlled substances on TRINITY property or while performing job-related tasks on or off the premises, must inform the Human Resources Manager within twenty-four (24) hours of such a conviction or plea.

Reasonable Suspicion Drug Testing

If management develops a reasonable basis to suspect that an employee is in violation of this policy, management reserves the right to require an employee to submit to an on demand drug screening. If an employee is involved in a motor vehicle accident that is determined to violate TRINITY policy, the employee may be subject to a drug and alcohol screening. These on demand screenings will be administered under the following guidelines:

- 1) The employee will be tested for the substances listed.
- 2) The employee will be subject to suspension while awaiting the results of the test. Should the suspicions be ruled unfounded by negative test results, the employee will be paid retroactively for time served on suspension.
- 3) Any employee who tests positive for any of these substances will be subject to disciplinary action, up to and including termination.
- 4) Any employee, who refuses to submit to the test, tampers with or attempts to substitute a urine sample will be subject to disciplinary action, up to and including termination.

Tobacco in the Workplace

Trinity is committed to providing a safe and healthy environment for employees and visitors. Therefore, smoking, chewing tobacco or vaping is not permitted in any office, crew room, bunk room, restroom, garage, company vehicle. If you must smoke or vape, please smoke or vape outside in a designated smoking area.

If you are at a medical facility, please follow posted signs designating smoking areas.

Video Surveillance

TRINITY strives to maintain a secure and safe working environment for its employees; a proactive measure to ensure this goal, video surveillance equipment has been installed at various office and satellite base areas.

Depending on the location you are assigned, the base facility may be under recorded video surveillance. ***Please note that these cameras are recorded and viewable; any and all audio has been disabled,*** and the placement of these cameras is general in nature and will not include bathrooms or changing rooms.

Criminal Offender Record Information (CORI)

TRINITY provides emergent and non-emergent care and transportation to those individuals residing, or receiving treatment, within our service areas, including children, the elderly and the disabled.

Therefore, in addition to pre-employment drug screening, motor vehicle operator record review, and past employment verification, TRINITY, as a certified agency, reviews Criminal Offender Record Information (CORI) for all candidates for employment. Additionally, in compliance with Massachusetts' regulations, TRINITY reviews CORI every year for all employees.

Section 2
Keeping In Touch

New Employee Orientation

As a new TRINITY team member, you will participate in an orientation. The orientation will cover topics such as our Vision and Guiding Principles, our benefits, Affirmative Action/Equal Employment Opportunities, Harassment Prevention, and more.

This is a great opportunity to ask questions and find out about our resources and opportunities available to you as a TRINITY EMS, Inc. team member.

Categories of Employment:

Introductory Period: All new employees are on an introductory period during their first 90 work days of employment. Work days are defined as Monday – Friday or five (5) days per week for all office personnel. At Trinity’s discretion, the introductory period may be extended for an additional period and nowhere herein should any inference be drawn that employees who have completed the introductory period are entitled to greater job-security rights.

During this period of time, you will be able to determine if your new job is suitable for you and your Manager/Assistant Manager will have an opportunity to evaluate your work performance.

Employees are not eligible for the following benefits unless and until they complete this ninety (90) day introductory period; 401(k), Life Insurance or Short-term Disability. Although we hope that you will be successful here, TRINITY may terminate your employment at any time, either during the ninety (90) day introductory period or afterwards, with or without cause and with or without notice. You are also free to quit at any time and for any reason, either during the introductory period or afterwards, with or without notice. Successful completion of the introductory period does not guarantee you a job for any period of time or in any way change the at-will employment relationship.

Open Door Policy

We encourage you to bring your questions, suggestions and complaints to our attention. Careful consideration will be given to each of these in our continuing effort to improve our company.

If you feel you have a problem, you should present the situation to your immediate Manager/Assistant Manager so that the problem can be settled by examination and discussion of the facts. We anticipate that (s) he will be able to satisfactorily resolve most matters.

If you still have questions after meeting with your immediate Manager/Assistant Manager and you would like further clarification on the matter, or the problem is with your immediate Manager/Assistant Manager, you may request a meeting with the Vice President of Operations. He/she will review the issues and meet with you to discuss possible solutions. It is recommended that all meetings first be scheduled by phone.

Your suggestions and comments on any subject are important to us so we encourage you to take every opportunity to discuss them with us. Your job will not be adversely affected in any way because you choose to use this procedure.

TRINITY EMS, Inc. Management Team

Your Manager/Assistant Manager(s) will provide you with instructions on how to learn and perform your job, introduce you to your co-workers, and keep you informed about your job progress and work performance. Your Manager/Assistant Manager(s) or scheduling department will be there to provide assistance and guidance when you need it and when you request it.

Get to know your Manager/Assistant Manager(s). Give your Manager/Assistant Manager(s) every opportunity to help you succeed in your job. You should feel free to discuss any matter, no matter how large or small, with your Manager/Assistant Manager(s). He/She is there to answer your questions, to listen to your work problems, and to take action when appropriate. If your Manager/Assistant Manager(s) cannot answer your question or solve your problem immediately, he/she/they will know whom to contact to get you a response.

TRINITY EMS, Inc. Management Team:

John Chemaly, President
Gary Sepe, Vice President
Christopher Dick, Director of Business Development
Jon Kelley, Director of Communications and Operations
Kirk Brigham Director of Clinical Services and Education
Robin Shone, Director of Accounts Receivable
Mary Constantine, Director of Human Resources
Drew Morrow, Director of Fleet Maintenance
Josiah Peters, Haverhill Operations Manager
Christopher Archambault, Assistant Manager of Communications
George Bryant, Assistant Operations Manager
Michael Calthorpe, Assistant Operations Manager
Amy Carroll, Assistant Operations Manager
Robert DeFlumeri, Assistant Operations Manager
Steven Dube, Assistant Operations Manager
Erin Gardner, Assistant Operations Manager
James Hackett, Assistant Operations Manager
Brian Jenckes, Assistant Operations Manager
Angel Martinez, Assistant Operations Manager
Steven Miller, Assistant Operations Manager
Amanda Newby, Assistant Operations Manager
Joshua Swallow, Assistant Operations Manager
Erik VanderMass, Assistant Operations Manager
Jenene Sullivan, Chair Van Assistant Manager
Paul Rossetti, Chair Van Supervisor

Suggestions and Issue Resolution

There may be times when you have suggestions for improvement that will enhance the work environment at TRINITY or provide better service to our clients and patients – please don't hold it back! We are counting on you to assist us in providing the best service we can. Our commitment is to give careful consideration to your input. Our team members are our greatest resource for improving our operations. All suggestions will be reviewed and considered in light of existing policies and procedures, laws and goals.

There also may be times when a difference of opinion arises between team members. If this happens, talk to your Manager/Assistant Manager or Human Resources about it. In the event you are not satisfied with your Manager/Assistant Manager's initial response, or if, for some reason, you don't wish to bring the issue to your Manager/Assistant Manager informally, there is a formal issue resolution process available to all team members. Issues such as work assignments, performance appraisals, cooperation between team members, individual compensation, discipline received, safety, etc., may all be brought forward in a formal Issue Resolution (IR) process explained below. Issues affecting someone other than you or a broad group of employees are not appropriate for the IR process. For harassment or sexual harassment issues there is a separate process outlined in this handbook.

The Issue Resolution (IR) process is set forth below. **All time frames referenced below are calendar days unless noted otherwise:**

Step 1

The employee must submit a written statement, describing the issue in detail, to his/her Manager and Director of Human Resources, within fourteen (14) days from the date that the issue arises. Upon receiving the issue notice, the Manager or his/her designee must meet with the employee and render a decision to the employee within seven (7) business days.

Step 2

If the employee is not satisfied with the decision, he/she may appeal the decision in writing to the Director of Human Resources. This appeal must be filed within seven (7) days from the date of the Manager's response. The Director of Human Resources or his/her designee must meet with the employee and render a decision to the employee within ten (10) business days.

The Director of Human Resources will facilitate all formal IR meetings with Managers and act as an objective party to both sides. While every effort will be made to meet the response deadlines, there may be occasions when the timelines will vary based upon Managers'/employees' schedules.

General Employee Rules of Conduct

When people work together for the advancement of mutual purposes and interests, general rules are required to guide interpersonal relations and conduct. In order to achieve the best interests of the Trinity and of each individual employee, the following pages include general employee rules of conduct and performance. It is important that you review these rules and the corrective action that may be applied.

It is understood that it is impossible to provide an exhaustive list of all types and kinds of impermissible conduct. The pages that follow intended to provide some illustrative examples. Trinity reserves the right to engage in whatever corrective actions it deems appropriate, including suspension or termination. Additionally, Trinity and each employee must comply with all Federal, State and local rules, regulations and laws.

Disciplinary Actions and Offenses

Like all other policies, these work rules are guidelines and do not create a contract of employment for any specific amount of time. As always and as stated herein, you have the right to terminate your employment at any time, with or without reason, and Trinity maintains the same right. This list of actions is not intended to cover every possible type of offense. Management, consistent with penalties for offenses of comparable gravity, will prescribe penalties for offenses or improper actions not listed.

Many of the items listed on this schedule combine several offenses in one statement, connected by the word “or”; usage of the word “or” in a charge makes it non-specific.

In general, penalties for disciplinary offenses and actions may fall within a four-step progressive disciplinary action; counseling, confirmation of verbal warning, written warning, and suspension, followed by termination of employment. In some circumstances, a penalty outside the general four-step process may be imposed, depending on the gravity of the offense or action and the employee’s past record and position.

Termination proceedings may be instituted against an employee at any time; especially when multiple infractions are committed. Termination will be considered whether or not the nature of the offenses are related (i.e. multiple first offenses regarding several different policies).

Suspension penalties on this schedule apply to work days.

Separate policies exist for disciplinary actions following vehicle accidents.

EXAMPLES OF ACTIONS SUBJECT TO DISCIPLINE

The following is a list of examples of actions that are subject to discipline. This list is for illustrative purposes and is not all-inclusive. As such other actions may be subject to discipline.

ATTENDANCE

NATURE OF OFFENSE
Failure to log in or out on time clock for shift
Punching in earlier than 10-minutes prior to start of scheduled shift
Unexcused tardiness
No Call No Show
Abuse of paid time off/unexcused absences *
*Three (3) absences in a thirty (30) day work day period

PROFESSIONAL CONDUCT

NATURE OF OFFENSE
Insubordination or disobedience to any properly appointed authority or official having responsibility over the employee
Disorderly conduct; fighting; threatening others, resisting appropriate authority
Discrimination against or harassment of an employee or patient As defined in anti-harassment policy
Theft/removal without permission or intentional destruction of Company property or any other individual's property
Reporting for duty or being under the influence of intoxicants, unauthorized possession of same on company time or property
Smoking in unauthorized areas in violation of company policy or local/state/federal regulations
Abuse or neglect of a patient
Inappropriate or unprofessional behavior
Possession of weapon on company property or vehicle *this includes guns and/or knives. Knives is defined by what the law would determine an illegal weapon.
Abuse of company telephones
Acceptance of gifts or gratuities ¹
Gross Negligence
Commitment, arrest or conviction of a felony.
Conduct that constitutes a violation of HIPAA

POLICES AND PROCEDURES

NATURE OF OFFENSE
Failure to comply with any company policy, procedure or patient care protocols
Failure to complete required documentation in a timely manner, including but limited to full signatures on necessity forms
Falsifying or failure to file incident reports per Trinity's policy, attempting to conceal policy violations, and patient care reports
Falsifying training records

¹ Except as part of an award or commendation, see policy

Failure to maintain appropriate license or credentials
Failure to carry license or credentials on person while on duty as required by regulation (resulting in relief from duty)
Failure to notify dispatch of equipment left at facilities
Delay of an ambulance response or refusing to respond to a call
Breach of patient confidentiality
Gambling while on duty
Failure to cooperate with investigation process

VEHICLE OPERATIONS AND SAFETY

NATURE OF OFFENSE
Failure to promptly report personal injury or unprotected exposure
Failure to observe precautions for personal safety or personal protective equipment
Improper disposal of sharps
Failure to comply with seat belt policy
Failure to report an accident
Violation of motor vehicle laws/regulations
Inappropriate use of warning lights or siren
Backing a vehicle without use of a spotter

Disciplinary Procedures Following a Vehicle Accident

The following personnel/disciplinary procedures will take place after an accident or occurrence:

- An investigation by a Manager or Assistant Manager will confirm whether or not the accident violated Trinity’s regulations
 - All judgments will be reviewed by Operations/Owners
 - Details of the accident will be reviewed to determine unsafe driving habits
- The employee’s driving history will be reviewed to identify either sustained performance improvement or patterns of unsafe driving habits
- A defensive driving check-ride may be required of employees who are approved for return to driving duties
- All counseling will be documented in the employee’s personnel file.

Administrative Leave During Investigation

Following an accident with a Trinity vehicle, the driver and the driver’s partner may be placed on administrative leave pending the investigation of the accident.

- Leave may be at the discretion of Operations or Owners
- Employee may return to duty or may be subject to disciplinary actions based upon the findings of the investigation.

Immediate Termination Regardless Of Previous Record

Termination of employment may be indicated regardless of previous accident record under the following circumstances:

- Employee disregards any motor vehicle laws, regulations or Trinity policy.
- Employee fails to report an accident to management
- Hit and Run accidents
- Accidents resulting from failure to properly secure a Trinity vehicle from movement

Dual Responsibility For Accidents

- Both members of an ambulance crew may be considered responsible and “at fault” for any accident involving the backing up of an ambulance when it is determined that the crew failed to appropriately use a “spotter”
- Both members of an ambulance crew are also responsible where the driver was found to have blatantly disregarded motor vehicle laws, regulation or Trinity policy and it is further shown that the other crew member concurred with these actions by failing to report the driver’s actions.
- An investigations will establish and make a final determination as to the responsibility of the non-driving crewmember. Accidents in need of further investigation will be reviewed by a Manager/Assistant Manager, and/or the Director of Operations.

Disciplinary Actions For Accidents Which Violates Trinity Policies

Employees will be subject to the following disciplinary actions following an accident which violates Trinity’s policies. These are guidelines only and Trinity reserves the right, at any time to modify, alter, or change these guidelines without notice.

OCCURANCE	PERSONNEL ACTIONS		REMEDIAL ACTION
FIRST Accident	MINIMUM Written warning *See addendum	MAXIMUM Termination	<ul style="list-style-type: none"> ➤ Check-ride ➤ Documented Counseling ➤ Drug Testing within 24 hrs if deemed appropriate by investigation
SECOND Accident	MINIMUM 1 Day suspension *See addendum	MAXIMUM Termination	<ul style="list-style-type: none"> ➤ EVOP CEVO class: or, ➤ Check-ride ➤ Drug Testing within 24 hrs if deemed appropriate by investigation
THIRD Accident	MINIMUM 1 week suspension	MAXIMUM Termination	<ul style="list-style-type: none"> ➤ CVO class: <u>and</u> ➤ Check-ride

	*See addendum		➤ Drug Testing within 24 hrs if deemed appropriate by investigation
FOURTH Accident	MINIMUM Termination	MAXIMUM	

Actions For Accidents Which Do Not Violate Trinity Policies

- Written documentation in file
- Does not accumulate on accident count and employee may be paid for time lost due to administrative leave

Actions For Motor Vehicle Citations

If a citation is issued for violation of motor vehicle law, employees are subject to disciplinary action of at least a 24-hour suspension. Disciplinary action may also include, but is not limited to termination, dependent on the severity and/or circumstances of the violation. Employees bear full responsibility for payment of any fines or court costs resulting from motor vehicle citations.

Self-Disclosure

As part of TRINITY EMS, Inc.’s on-going commitment to you, your co-workers and outside contacts, self-disclosure of any conviction, deferral judgment, criminal action, plea bargain, loss of license or other violation of law must be reported by the employee to the Director of Human Resources and Manager/Assistant Manager within twenty-four (24) hours of any of the aforementioned action(s). You should notify Trinity of any pending action which could or may reasonably be expected to result in a conviction, loss of license, deferral judgment, or plea bargain.

Loss of driver’s license or MA/NH EMT certification must be reported to the HR Department, Operations, Clinical Director and MA/NH OEMS within three (3) calendar days of the effective loss date.

If the Director of Human Resources determines, based on preliminary information supplied by the employee, that the conviction, deferral judgment, action or loss of license, or plea bargain bears a relationship to the job, a criminal background check will be conducted utilizing an outside agency. You will be required to cooperate with HR and execute any and all documents to allow said investigation to proceed. TRINITY will not consider sealed or expunged records. The Director of Human Resources will review the information from the criminal background check, evaluate the action, the employee’s role and responsibilities with TRINITY and the resulting or potential impact such action may have on TRINITY and outside contacts. During this evaluation process, the employee may be placed on an unpaid suspension pending further investigation or other appropriate measures or actions may be taken.

Based on the findings of the investigation and whether the action is related to the employee’s position and duties, the employee may receive corrective action up to and including termination.

Section 3
Work Environment

Harassment Prevention

Sexual Harassment Prevention

Purpose of Policy

- To provide a work environment free of sexual harassment for all employees and to affirm management's responsibility to take action preventing and/or dealing with sexual harassment in the workplace
- To outline employee's rights with respect to sexual harassment and to ensure all employees are aware of the seriousness and consequences of such harassment
- To provide a process whereby a recipient of sexual harassment may initiate a complaint.

SEXUAL HARASSMENT POLICY

I. Introduction

It is the goal of TRINITY to promote a workplace that is free of sexual harassment. Sexual harassment of employees occurring in the workplace or in other settings in which employees may find themselves in connection with their employment is unlawful and will not be tolerated at TRINITY. Further, any retaliation against an individual who has complained about sexual harassment or retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is similarly unlawful and will not be tolerated. To achieve TRINITY's goal of providing a workplace free from sexual harassment, the conduct that is described in this policy will not be tolerated and we have provided a procedure by which inappropriate conduct will be dealt with, if encountered by employees.

Because TRINITY takes allegations of sexual harassment serious, TRINITY will respond promptly to complaints of sexual harassment and where it is determined that such inappropriate conduct has occurred, TRINITY will act promptly to eliminate the conduct and impose such corrective action as is necessary, including disciplinary action where appropriate.

Please note that while this policy sets forth TRINITY's goals of promoting a workplace that is free of sexual harassment, the policy is not designed or intended to limit TRINITY's authority to discipline or take remedial action for workplace conduct which TRINITY deems unacceptable, regardless of whether that conduct satisfied the definition of sexual harassment.

II. Definition of Sexual Harassment

In Massachusetts, the legal definition for sexual harassment is this: "sexual harassment" means sexual advances, requests for sexual favors, and verbal or physical conduct of a sexual nature when:

- (a) submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of employment or as a basis for employment decisions; or,
- (b) such advances, requests or conduct have the purpose or effect of unreasonably interfering with an individual's work performance by creating an intimidating, hostile, humiliating or sexually offensive work environment.

Under these definitions, direct or implied requests by a supervisor for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits, or continued employment constitutes sexual harassment.

The legal definition of sexual harassment is broad and in addition to the above examples, other sexually oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating a work place environment that is hostile, offensive, intimidating, or humiliating to male or female worker's may also constitute sexual harassment.

While it is not possible to list all those additional circumstances that may constitute sexual harassment, the following are some examples of conduct which if unwelcome, may constitute sexual harassment depending upon the totality of the circumstances including the severity of the conduct and its pervasiveness:

- Unwelcome sexual advances – whether they involve physical touching or not;
- Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life, comment on an individual's body, comment about an individual's sexual activity, deficiencies, or prowess;
- Displaying sexually suggestive objects, pictures, cartoons;
- Unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments;
- Inquiries into one's sexual experiences; and
- Discussion of one's sexual activities.

All employees should take special note that, as stated above, retaliation against an individual who has complained about sexual harassment, and retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is unlawful and will not be tolerated by TRINITY.

III. Complaints of Sexual Harassment

If any of TRINITY's employees believes that he/she has been subjected to sexual harassment, the employee has the right to file a complaint with TRINITY. This may be done in writing or orally. If you would like to file a complaint you may do so by contacting the Human Resources Manager, 1221 Westford Street, Lowell, MA 01853, 978-441-9191. This person is also available to discuss any concerns that you may have and to provide information to you about TRINITY's policy on sexual harassment and its complaint process.

IV. Sexual Harassment Investigation

When TRINITY receives a complaint, TRINITY will promptly investigate the allegation in a fair, expeditious and thorough manner. The investigation will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances. The investigation will include a private interview with the person filing the complaint and with witnesses. TRINITY will also interview the person alleged to have committed sexual harassment. When TRINITY has finished

its investigation, it will, to the extent appropriate, inform the person filing the complaint and the person alleged to have committed the conduct of the results of that investigation.

If it is determined that inappropriate conduct has occurred, TRINITY will act promptly to eliminate the offending conduct, and where it is appropriate TRINITY will also impose disciplinary action.

V. Disciplinary Action.

If it is determined that inappropriate conduct has been committed by one of TRINITY's employees, TRINITY will take such action as is appropriate under the circumstances. Such action may range from counseling to termination from employment, and may include such other forms of disciplinary action as TRINITY deems appropriate under the circumstances.

VI. State and Federal Remedies

In addition to the above, if you believe you have been subjected to sexual harassment, you may file a formal complaint with either or both of the government agencies set forth below. Using TRINITY's complaint process does not prohibit you from filing a complaint with these agencies. Each of the agencies has a short time period for filing a claim. (EEOC – 300 days; MCAD 300 days).

1. The United States Equal Employment Opportunity Commission (EEOC):
One Congress Street, 10th Floor, Boston, MA 02114.
2. The Massachusetts Commission Against Discrimination (MCAD):
Boston Office: One Ashburton Place, Rm. 601, Boston, MA 02108.

Non-Harassment Policy

TRINITY is proud to promote a collegial work environment in which all individuals are treated with respect and dignity. We strive to create a professional work atmosphere that promotes equal opportunities and prohibits discriminatory practices, including harassment on the basis of race, color, sex, age, religion, national origin, ancestry, marital status, sexual orientation, disability, genetic information, veteran status, uniformed military services, or any other form, is unlawful and will not be tolerated in the workplace, or other work-related settings.

Forms of harassment may include, but are not limited to, the following:

- Verbal harassment; e.g., suggestive, insulting or derogatory comments, epithets, innuendoes, sounds, jokes, teasing or slurs based on any of the above categories, and sexual propositions or threats.
- Physical harassment; e.g., assault, impeding or blocking movement, or any unwanted physical contact or interference with normal work or movement, including touching, pinching, brushing the body, sexual contact or assault when directed at any individual because of any of the above categories.

- Nonverbal harassment; e.g., derogatory posters, cartoons, suggestive objects, pictures, letters or drawings; also such actions as leering, whistling, or obscene gestures based on any of the above categories.

Any employee who feels that he/she is a victim of such harassment should immediately report the matter to the Director of Human Resources or any other member of management. Trinity will investigate all such reports as confidentially as possible. Adverse action will not be taken against an employee who reports or participates in the investigation of a violation of this policy. Violations of this policy will not be permitted and may result in disciplinary action, up to and including discharge.

Responsibilities and Investigation

All team members are expected to immediately report the facts of any perceived harassment by a co-worker, Manager/Assistant Manager, and agent of TRINITY or others to his/her Manager/Assistant Manager, to a member of management whom the employee feels could help without fear of retaliation. Confidentiality regarding a claim of harassment, and the facts of the incident(s) giving rise to the claim, shall be maintained to the fullest extent permitted by the circumstances.

The Director of Human Resources shall promptly investigate the allegations, and take appropriate action if warranted. TRINITY prohibits any form of retaliation against any employee for filing a bona fide complaint under this policy, or for assisting in a complaint investigation. However, if after investigating any complaint of harassment or unlawful discrimination, TRINITY determines that the complaint is not bona fide, and/or that the employee has provided false information regarding the complaint, corrective action may be taken against the individual who filed the complaint or who gave the false information.

State and federal laws protect all employees from retaliation for filing a complaint for sexual harassment, or for cooperating in an investigation of a complaint of sexual harassment.

For more information, you can contact,

- MCAD (Massachusetts Commission Against Discrimination)
(617) 727-3990
- EEOC (Equal Employment Opportunity Commission)
(617) 565-3200

Workplace Violence

TRINITY strives to maintain a safe work environment for all employees and to prevent workplace violence. Accordingly, TRINITY has adopted the following guidelines to deal with intimidation, harassment, and acts of threats of violence that may occur on TRINITY premises or involve an employee of TRINITY.

All employees must treat others with courtesy and respect at all times. Employees are expected to refrain from verbal or physical fighting, “horseplay”, or other conduct that might be dangerous or otherwise injurious or harmful to others. Firearms, weapons, and other dangerous, hazardous, or illegal devices or substances are prohibited from the premises of TRINITY or any location where the employee is on-duty.

Conduct that threatens, intimidates, or coerces another employee, a client, a patient, a vendor, a contract worker or a member of the public at any time, including off-duty periods, will not be

tolerated. This prohibition includes all acts of harassment on the basis of race, color, sex, age, religion, national origin, ancestry, marital status, sexual orientation, disability, genetic information, veteran status, uniformed military service, or any other classification protected by law. Any such act may result in discipline up to and including termination of employment.

Employees must immediately report all acts or threats of violence, both direct and indirect, as soon as possible to the Director of Human Resources or a member of management at TRINITY. This provision includes threats by and/or directed to employees, clients, patients, vendors, contract workers or other members of the public. When reporting a threat of violence, employees should be as specific and detailed as possible.

When an employee finds him or herself in a situation involving actual violence, imminent threat of violence, or any situation where he or she believes that his or her personal safety is threatened, the employee should immediately contact appropriate law enforcement officials, and then contact TRINITY management, as described above.

TRINITY promptly and thoroughly investigates all reports of actual and potential threats, violence, or inappropriate conduct. Employees should raise concerns and make reports without fear of reprisal or discipline for lodging any good-faith report of actual or potential workplace violence. In the course of handling reports, TRINITY will strive to maintain confidentiality to the extent practicable under the circumstances.

TRINITY encourages employees who apply for or obtain a protective or restraining order to notify his or her Manager and/or Director of Human Resources, so that TRINITY can work with the employee to attempt to take steps to keep individuals served with such orders off Trinity premises. In the event an employee applies for or obtains a protective or restraining order against another employee TRINITY will make reasonable efforts to assist the affected employees.

Anyone determined to be responsible for acts or threats of violence or other conduct that is found to be in violation of these guidelines may be subject to disciplinary action, up to and including immediate termination of employment, as well as possible criminal or civil action.

Employee Fraternalization Policy

It is the expectation and policy of TRINITY EMS that each employee interacts with their fellow employees in a courteous, respectful and professional manner at all times while on duty. This includes the use of professional and respectful language to each other and precludes any physical conduct amongst employees that goes beyond that needed to perform their job functions. Personal dating relationships must never be prevalent, evidenced or interfere with our job responsibilities while on duty.

Personnel Records

TRINITY EMS, Inc. maintains accurate and current information for each employee. It is the intent of TRINITY EMS, Inc. to ensure privacy of information contained in employee records. Employee records are maintained in the HR Department. Employee records are considered to be the property of TRINITY EMS, Inc.

Information from employee records may be made available only as follows:

1. An employee's Manager and all Managers in the employee's direct reporting structure are authorized to view the employee's file.

2. Managers who are interviewing internal candidates for transfer are permitted to view the candidate's personnel file. Disclosed contents of the file will be limited to performance history.
3. Employees may review their own file by requesting an appointment in advance with the Director of Human Resources and in accordance with state law. The copying of information contained in the employee personnel files will not be permitted, unless legally mandated.
4. If a credit check from a financial institution is submitted in writing, with the authorizing signature of the employee, TRINITY will provide the employee's name, address, title, base salary and hire date.
5. To any auditor, as necessary, of a TRINITY benefits plan.

The only other circumstances in which information on an employee is provided to other parties is in compliance with regulations of governmental agencies, judicial orders, other law enforcement documents, as required by a Worker's Compensation carrier to verify claims if explicitly authorized by the employee or senior management and counsel for Trinity may have access to employees files for various issues, including disciplinary matters, inquiries or to ensure compliance with applicable laws.

All requests for references or verification of employment should be directed to the Director of Human Resources for response. Managers and corporate officers should not respond directly to these requests.

TRINITY's policy is to provide only limited, factual information on current and former employees. Information provided is limited strictly to dates of employment and job title. Letters of recommendation on current or former employees are not provided except where such recommendation is required in academia. Clinical & QA recommendation letters will be provided to the state regions medical directors and the similar agencies or persons.

Personnel Data

Employees must notify the Director of Human Resources in writing within five (5) business days of any changes to the following:

1. Name, address, telephone number
2. Marital Status
3. Number of dependent's
4. Insurance beneficiary designations, and/or
5. Persons to be notified in case of an emergency

Employment Classifications

Full-Time Employee Definition:

Full-time employees are regularly scheduled to work at least forty (40) hours per week. Full-time employees may apply for part-time status by submitting a written request to their immediate Manager or Assistant Manager. The employee must make the request at least two (2) weeks prior to the desired status change date. Such change in status shall be at the discretion of TRINITY management.

Part-Time Employee Definition:

Part-time employees are regularly scheduled to work less than forty (40) hours per week. Part-time employees may apply for full-time status by requesting such change in writing to their immediate Manager or Assistant Manager as appropriate. Such change in status shall be at the discretion of TRINITY management.

Per Diem Employee Definition:

Per Diem employees are those not regularly scheduled to work, but accept work assignments on an “as needed” basis. The availability of Per Diem jobs vary between TRINITY locations and are determined by local needs and practices.

Temporary Employee Definition:

A temporary employee is an employee who is hired directly by TRINITY (not an employment agency) on a temporary basis, usually for up to one hundred-eighty (180) days, or for completion of a specific task or project.

A temporary employee will not automatically change from temporary status merely by working an excess of the period originally expected and designated. An employee will change from temporary to regular status only if advised of such a change, in writing, by the HR Department and the appropriate member of management. Such notification will indicate the effective date on which the employee became or will become a regular employee.

Becoming a regular employee or passing the temporary period does not guarantee you a job for any period of time or in any way change the at-will employment relationship. TRINITY may terminate your employment at any time, either during the temporary period or afterwards, with or without written cause and with or without notice.

Temporary employees are not eligible for TRINITY sponsored benefits. If such a change in classification occurs, no portion of the employee’s service as a temporary employee shall be credited or considered in any way for purposes of determining either the employee’s eligibility or the amount of any welfare benefits to which he/she becomes entitled subsequent to the change in status.

Re-hired Employee Definition:

TRINITY has a no re-hire policy for terminated employees, although exceptions may be made on a case-by-case basis. Employees who are rehired following a break in service in excess of six (6) months must complete a new introduction/training 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 for purposes of measuring benefits.

However, special rules apply under TRINITY’s 401(k) Plan to rehired employees. Refer to the applicable Summary Plan Description. In addition, part-time employees, per diem employees, temporary employees and re-hired employees may not be entitled or may not qualify for certain company benefits. Refer to the Director of Human Resources for specific benefits and plan entitlements.

Exempt and Nonexempt Employees

Your entitlement to earn overtime pay depends on whether you are classified as an exempt or a nonexempt employee. Exempt employees are those who do not earn overtime because they are exempt from the overtime provisions of the Federal Fair Labor Standards Act and applicable state laws.

Nonexempt employees are those who meet the criteria for being covered by the overtime provisions of the Federal Fair Labor Standards Act and applicable state laws.

If you are uncertain about which category you fall into, speak to your Manager or the Director of Human Resources.

Certifications

In conforming to State Laws and Regulations, employees working on an ambulance must possess current certifications. It is the expressed responsibility of each employee to maintain his or her own level of certification and drivers' and to carry them on their person at all times while working.

Employees must also show their new or updated certifications to a member of management for verification before submitting copies of their certifications to the HR Department. This must be done immediately upon their renewal. If an employee does not provide the proper copies and the scheduling system shows any certifications have expired, employee's will be removed from the schedule and will not be authorized to work until the proper documentation is obtained. Employees may be disciplined for failure to maintain current certifications up to and including termination of employment. Falsification of training records or requirements required by state of federal law is grounds for immediate discipline up to and including termination of employment.

Employees must possess the following current and valid minimum levels of certifications at all times:

- | | |
|-----------------------|--|
| 1. Chair Car Operator | Valid Driver's License
Healthcare Provider (CPR) Certification
First Aid |
| 2. EMT-B | MA EMT Certification
Healthcare Provider (CPR) Certification
Valid Driver's License
NH EMS and/or National Registry Certification (If applicable) |
| 3. Paramedic or EMT-A | MA Paramedic or Advanced Certification
ACLS Certification
Healthcare Provider (CPR) Certification
Valid Driver's License |

NH and/or National Registry Certification (If applicable)

Note: Employees who have their motor vehicle license or EMS certifications restricted, or suspended, or revoked for any reason, are forbidden to operate or work on any vehicle and must notify the HR Department immediately.

Employment of Relatives

Under Review 11/13/2018

[Redacted]

[Redacted]

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Solicitation/Distribution

In an effort to clarify the circumstances under which an employee may engage in solicitation or organization of fellow employees, TRINITY has adopted a formal policy on collection, distribution, solicitation, and organization of employees. These rules are designed to permit such activity only at those times and in those areas, which are compatible with the efficient and orderly operation of TRINITY business.

Due to the nature of this policy, three (3) working definitions are necessary to understand the policy guidelines:

1. The terms “solicitation” and “organization” shall include any verbal communication to any employee or group of employees which encourages, advocates, demands, or requests a contribution of money, time, effort or personal involvement or membership in any fund (charitable or otherwise), collection, athletic team, social, fraternal, religious, civil or labor organization of any kind or type whatsoever, or the purchase of any merchandise, raffle or lottery ticket, etc.
2. The terms “insignia”, “badges”, or “buttons” shall include any symbol or ornamentation that identifies, or states a slogan of, or encourages membership in, any fraternal, civic, political, religious or labor club or organization.
3. The term “distribution” shall include any written communication which encourages, advocates, demands, or requests a contribution of money, time, effort, personal involvement or membership in, or support for any fund (charitable or otherwise), collection, athletic team, social, fraternal, religious, civil or labor organization of any kind or type whatsoever, or the purchase of any merchandise, raffle or lottery ticket, etc.

The term “working time” shall be defined as all time in which an employee is actually assigned or scheduled to perform work duties.

The following rules shall apply:

- (a.) No employee or organization shall engage in any solicitation, or solicitation of other employees, patient, customer or vendor for any purpose whatsoever while either the soliciting employee(s) is/are on working time or in work areas.
- (b.) No employee, individual or organization may engage in the distribution of any materials while on working time or in work areas.
- (c.) No solicitation, organization or distribution by a non-employee may take place on TRINITY premises or in TRINITY vehicles at any time or under any circumstances.
- (d.) In order to maintain good customer relations and preserve the image of TRINITY’s business, no employee may wear any insignia, badge, or button on their person, nor display any insignia, badge, or button on their desk or in their work area, which identifies or states the slogan of a fraternal, civic, political, religious or labor organization when, as part of their normal duties and responsibilities, that employee comes in contact with patients, customers, and/or is likely to do so.
- (e.) TRINITY may, on occasion, require employees to wear insignia, badges, or buttons in relation to TRINITY business or a promotional campaign of TRINITY, and if it does, that

requirement shall not be deemed a waiver or elimination of the rule set forth in letter (c) above.

- (f.) No gambling of any kind during working hours or on Trinity premises (including, but not limited to, participation in poker, dice or other games of chance; the solicitation or acceptance of wagers, whether personally or on behalf of another person; and the selling or purchase, lottery tickets or chances of any kind). TRINITY Management on occasion may approve certain charitable campaigns. At no time, however, will any employee be required to donate as a condition of employment.

Bulletin Boards

Bulletin Boards are located at several company locations and will provide employees with current information relating to policies and practices, job announcements, educational opportunities, items of interest, and federal, state and local regulations relating to employment. Trinity bulletin boards may not be used for personal or other business without prior approval.

Materials for posting on any of the bulletin boards must be approved by the Director of Human Resources, Department Manager, President or Vice President.

Employee email is available to all TRINITY personnel and should be monitored regularly to keep abreast of any and all communications by Trinity.

Use of Electronic Communication Devices

TRINITY may provide you with electronic communication devices, equipment, and technology, including, but not limited to, telephones, email, voice mailboxes, computer files, Internet access, facsimile machines, and cellular telephones. The electronic communication devices, equipment, and technology are provided to you to assist in the conduct of business within TRINITY

All electronic communication devices, equipment, technology, and all data stored on any of the foregoing, remain at all times the property of TRINITY. TRINITY reserves the right to monitor, retrieve, or read any data composed, sent or received.

The electronic communication devices, equipment and technology are to be used for TRINITY business only. Employee's use of Trinity provided electronic devices, equipment or technology for personal matters (exceptions only for emergency matters) is a direct violation of TRINITY policy. This includes voice electronic mail, facsimiles and the Internet.

It is also a violation of TRINITY policy for any data composed, sent or received via the communication devices, equipment and technology, to contain content that may be reasonably considered offensive or disruptive to any employee. Failure to comply with this policy may result in disciplinary action up to and including termination.

Offensive content would include, but would not be limited to, sexual comments or images, racial slurs, gender-specific comments or any comments that would offend someone on the basis of his or her age, sexual orientation, religious beliefs, national origin or disability. Employees may never call 900 numbers using Trinity property while on duty or at any time while on Trinity property. The postage meter may not be used for personal mail. All metered mail will be treated as Trinity mail and is subject to inspection. Photo copy machines are intended for Trinity business only.

Photo and Video Recording Devices

Use of photo, audio, or video equipment to record or otherwise memorialize patients or scenes is prohibited. No employee shall record or photograph any patient, motor vehicle accident, structure, fire, crime scene, or any other event during their duties as an employee of TRINITY, unless the material is to be used as documentation for an investigation into damage to company property, i.e., a motor vehicle accident involving a Trinity vehicle.

Failure to follow Trinity policies, procedures, and guidelines shall result in appropriate disciplinary action being taken. Exceptions to this policy shall only be granted upon the express consent by a member of the management team.

Signature Policy

All TRINITY employees signing any documents in the course of performing their job duties as a TRINITY employee must sign any such documents using their full signature, containing their first name and last name. No employee shall sign any document, record, or report, including but not limited to Patient Care Reports, using their initials. Failure to follow company policies, procedures, and/or guidelines shall result in appropriate disciplinary action being taken.

****For complete policy guidelines, refer to the Computer Usage Policy Manual or contact the Director of Human Resources or Director of Communications.***

Blogging and Social Media Policy

The following policy is intended to set forth the terms of TRINITY's policy on employee use of blogs and other interactive websites. This policy covers employees creating, posting, commenting, or uploading to any Internet website, including any TRINITY-sponsored blog or website, as well as any non-TRINITY external site, such as media sites, chat rooms, bulletin boards, newsgroups, discussion groups, non-TRINITY email groups, personal websites, video sharing sites, picture sharing sites, dating sites, and social networking sites (e.g. MySpace, Facebook, Twitter, etc.), whether or not such sites are set to private. Failure to follow TRINITY's Blogging and Social Media Policy may lead to disciplinary measures, up to and including immediate termination of employment.

TRINITY recognizes that blogging is generally informal. Yet employees are cautioned not to allow informality to lapse into rash postings, careless behavior or improper comments; they are expected to blog with respect. Employees may not engage in any postings that may harm or tarnish the image, reputation and/or goodwill of TRINITY or any of its employees or clients. While postings may be critical of TRINITY's policies or decisions, they should always be respectful and constructive and refrain from delving into personal attacks. Employees are expected to abide by TRINITY's policies against discrimination, harassment, and retaliation when blogging. Employees are prohibited from making any discriminatory, harassing, disparaging, libelous, defamatory, obscene, indecent, or threatening comments (e.g., sexually explicit or racial messages, jokes, or cartoons) when blogging, or otherwise engaging in any conduct prohibited by TRINITY. Employees are expected to exercise restraint in terms of exaggeration, colorful language, guesswork, legal conclusions and derogatory remarks or characterizations.

TRINITY's policies regarding the nondisclosure of proprietary, confidential and personal information apply to online blogging or postings. As such, employees must not post information on TRINITY IT systems that in any way discloses confidential or proprietary information of TRINITY, its employees, or any other third party that has disclosed information to TRINITY. The posting of copyrighted materials on TRINITY Blog also is not allowed. In addition, employees are prohibited from sharing any confidential information they learn by accessing TRINITY resources with anyone outside of TRINITY unless they have been given express written permission to do so by TRINITY. Further, employees may not use any confidential information they learn by accessing TRINITY resources for their own benefit or for the benefit of any person or entity other than TRINITY.

Employees are free to create or participate in non-TRINITY social media sites ("non-TRINITY blog") and other forms of online publishing and discussion, provided that such participation does not violate any TRINITY policies, is not detrimental to TRINITY's best interests and does not interfere with an employee's regular work duties. Employees may not engage in blogging during work time. If an employee's job is being adversely affected by time spent blogging, the employee may be subject to discipline, including immediate termination.

Employees blog/post at their own risk and are personally and legally responsible for their postings and online comments. TRINITY will not assume any liability or risk for an employee's blogging or posting online. The following are illustrative of the types of relevant laws implicated by blogging, but are not intended to be comprehensive: privacy, libel, defamation, harassment, copyright, data theft, disclosure of material non-public information, and disclosure of confidential or trade secret information.

When posting in a non-TRINITY blog or online forum, employees must speak in the first person, and make it clear that what is being said is the employee's personal views and opinions and does not necessarily reflect the views and opinions of TRINITY. In no way may employees represent or suggest that their opinions or positions are endorsed by TRINITY or any of its managers or employees.

Employees must always be in compliance with TRINITY's policies regarding non-disclosure of proprietary, confidential and personal information, especially on non-Trinity blogs. Accordingly, employees are prohibited from revealing, or making any reference to, any proprietary or confidential information, trade secrets, or other information covered by such policy. Even vague or disguised references to such information could violate TRINITY policies and applicable laws. Employees also must respect copyright and fair use laws when posting. Additionally, never identify a Trinity client, partner, vendor, supplier or affiliate by name, and never discuss the confidential information of a Trinity client, partner, vendor and supplier or affiliate online.

All employees also should understand that posting false or misleading information about TRINITY may subject both the employee and Trinity to liability for violation of securities laws. Employees are prohibited from disclosing material, nonpublic information about TRINITY. Information is material if it would change a reasonable person's perception Trinity.. Again, even vague or disguised references to nonpublic information about TRINITY may violate such laws (such as statements that any aspect of TRINITY is "strong," hints regarding a forward-looking statement about TRINITY, speculation about Trinity business deals, mergers, acquisitions, relationships, partnerships, etc.).

Employees may only disclose operational or financial information if such information has already been released publicly in a press release, public filing or other published materials. TRINITY reserves the right to ask employees to temporarily limit their personal online commentary or blogging to topics unrelated to TRINITY if it believes that is necessary to ensure compliance with securities regulations or other laws.

Employees are prohibited from using Trinity logos, trademarks or other intellectual property or adding a link to TRINITY's website without TRINITY's written permission. TRINITY monitors the use of its name, copyrights, trademarks, website, and other information on the Internet. Employees likewise may not post any content that is harassing, discriminatory, defamatory, threatening, disparaging, libelous or otherwise illegal or injurious. Moreover, non-Trinity blogs must never be used for internal business-related communications between fellow employees.

Failure to adhere to Trinity policies regarding blogging and online postings will be considered grounds for discipline, including immediate termination. Such violations can also lead to serious legal ramifications for offending individuals, as they can be held personally liable for any post that is defamatory, proprietary, discriminatory, harassing and obscene or which violates any other law.

Any inappropriate bloggings and/or postings that violate these guidelines should be reported to Trinity management immediately.

Employee Appearance

TRINITY considers it very important you are well groomed, neat, and dress appropriately for your job function and, we ask all employees to use common sense and good judgment when they dress for work. A dress code must be followed that is appropriate to the work environment. You are expected to represent TRINITY in a professional manner and dress appropriately for conducting such business. Please make sure that you are neat and clean at all times. ***Know your audience, remember what you represent, and dress accordingly.*** All employees are expected to present themselves in a professional manner at all times. Unusual manner of dress and appearance is unacceptable. We will try to reasonably accommodate any employee's special dress or grooming needs that are the result of religion, ethnicity/race or disability. If you have any questions about the proper attire for your position, please contact the Director of Human Resources.

An individual not in compliance with TRINITY's Dress Code may be relieved of duty and subject to disciplinary action up to and including termination. The uniform will not be worn off duty except when commuting to and from work. The uniform may not be worn anywhere that would bring discredit to TRINITY, or to its employees.

General Guidelines for Everyone

TRINITY wishes to provide a work environment that is free of safety hazards, offensive behavior and harassment of any kind. Therefore, the following clothing is NOT ACCEPTABLE: spandex; bare feet, shoes or sandals that would be considered beach attire are totally unacceptable; pants, shorts, or skirts worn below the waistline; sexually provocative clothing; clothing of any kind promoting competitor products; hats in the office environment; clothing with profanity, nude or

semi-nude pictures; sexually suggestive slogans, cartoons, or drawings; the observable lack of undergarments and exposed undergarments.

General Guidelines for Operations Personnel:

1. Shirts must be buttoned and tucked in at all times.
2. Only black shoes or boots are permitted and should be cleaned and/or polished at all times.
3. Trinity, EMT, Paramedic or National Registry patch must be worn. No other patches can be worn.
4. Due to the recent changes in law regarding healthcare providers, patients have the right to know who is caring for them. Therefore, employees will be issued a picture ID that must be worn above the waist at all times during patient contact and it must be visible to patients. Please refrain from attaching pins, stickers or other devices on your picture ID.
5. All Trinity Field personnel are required to wear a watch with a seconds counter. Rings are permitted as long as they don't interfere in job performance or are capable of injuring a patient. Chains and necklaces, if worn, must not be visible. **No earrings may be worn during scheduled work hours.**
6. Facial or oral jewelry, including but not limited to eyebrow, nose, lip or tongue piercing are not permitted.
7. Hair must be neatly groomed and kept clean. Extreme or unusual hair or eyebrow colors are not permitted. While on duty long hair must be pulled back and off shoulders. *Extreme hair color is defined as non-natural: bright purple, green, blue, pink, etc.
8. No beards are permitted as they specifically interfere with the proper wearing and function of the N-95 respirator – 29 CFR 1910 §§ 132, 134. Mustaches, goatees, sideburns, may be worn, however, they must be neat, trimmed and NOT interfere with the proper wearing and function of the N-95 Respirator.
9. No uniforms shall be worn by the employee while off duty, other than to and from home.

General Guidelines for Office Personnel:

These lists are provided for illustrative purposes only and not for the purpose of limitation. The list is based upon Trinity's safety concerns and strong desire to increase productivity as well as maintain an atmosphere that is free of harassment of any kind.

Office Environment – Men	
Acceptable	Not Acceptable
Dress Pants, Dockers, Corduroy	Jeans, Shorts, Cotton or Nylon Sweatpants, Athletic Attire
Pullovers, Dress Shirts, Sweater with Collared Shirt or Turtleneck, Polo Type Shirt, Blazer/Sport Coat	Sweatshirts, T-Shirts, Sleeveless Shirts
Loafers, boat/deck shoes	Athletic Shoes, Work Boots, Sandals

Office Environment – Women	
Acceptable	Not Acceptable
Dress Pants, Dockers, Corduroy, Skirts or Dresses	Jeans, Shorts, Sweatpants, Athletic Attire, Casual Shorts, Stretch Pants or Leggings, Stirrups, Cotton or Nylon Sweatpants, dress skorts
Blouses, Sweaters, Polo Shirts, Dress Jackets, Sleeveless Blouses/Dresses	Tank Tops, Sweatshirts, T-Shirts, Halter Tops, Spaghetti Straps,
Dress Shoes With or Without Heel, Loafers, Boots, Open Toed Shoes, Slides or Dress Sandals	Flip Flops, Hiking Boots or Hiking Sandals, Athletic Shoes
Casual Friday's	
Acceptable	Not Acceptable
Jeans, Dockers, Corduroy, Pants, Skirts or Dresses	Shorts, Sweatpants, Athletic Attire, Casual Shorts, Cotton or Nylon Sweatpants, dress skorts
Blouses, Sweaters, Polo Shirts, Dress Jackets, Sleeveless Blouses/Dresses	Tank Tops, Sweatshirts, T-Shirts, Halter Tops, Spaghetti Straps,
Dress Shoes With or Without Heel, Loafers, Boots, Open Toed Shoes, Slides/Clogs or Dress Sandals	Flip Flops, Hiking Boots or Hiking Sandals, Athletic Shoes, (exception may be made on dress down day for athletic shoes)

Note: Exceptions to Casual Fridays would permit sneakers, T-Shirts and Sweatshirts on inclement weather days and on Fridays when files were being moved from the office to storage

Attendance and Punctuality

TRINITY is a service company, providing important and valuable services to the public. You are important to the effective operation of this business. When you are not here at expected times or on expected days, someone else must do your job or delay doing his/her own job while waiting for you to arrive. As the result, we expect you to keep regular attendance and to be on time and ready to work at the beginning of each scheduled workday.

If you must miss a day of work for reasons other than vacation, sick leave, or other approved leave, you must notify your Manager or Assistant Manager as far in advance as possible. Leaving a voicemail is not an acceptable means of notification. You must speak directly with a Manager or Assistant Manager. If one is not available you must speak with a member of dispatch. If you are late for work or fail to appear without calling as required by this policy, or by other policies you may face disciplinary action, up to and including termination.

Employees with three (3) absences in a thirty (30) day work period are subject to progressive discipline up to and including termination of employment. The work period is defined as Monday – Friday or five (5) days per week.

Trinity provides its employees with accrued Paid Time Off (PTO) throughout the year. Vacations must be scheduled with one's Manager/Assistant Manager in advance (at least 24 hours for one or two days; two weeks' notice for three or more consecutive days). When scheduling a vacation you must have PTO available for the days you are requesting off; if no time is available your request for time off will be denied. Where MA sick time law permits.

If you are scheduled to work the day before or after a Trinity paid holiday and call out sick, you will not be paid for that holiday nor will you be permitted to use any available PTO for that missed holiday. Where MA sick time law permits.

Family And Medical Leave Act of 1993 (29 CFR Part 825)

Absences due to illnesses or injuries, which qualify under the Family and Medical Leave Act (FMLA), will not be counted against an employee's attendance record. Medical documentation within the guidelines of the FMLA may be required in these instances. Employees absent 30 or more consecutive days may not have their work schedule available upon their return to duty. Employee's committed scheduled hours will be reserved and available to them upon their return to duty.

National Defense Authorization Act for FY 2008 (29 CFR Part 825)

Amendments to the FMLA enacted as part of the National Defense Authorization Act for FY 2008, which provide additional job-protected leave rights to eligible employees of covered employers who provide care for covered service members with a serious injury or illness and because of qualifying exigencies arising out of the fact that a covered member is on active duty or has been notified of an impending call or order to active duty in support of a contingency operation.

Absences And Tardiness

Prescheduled times away from work using accrued or PTO (where available) days are not considered occurrences for the purpose of this policy.

An absence occurs when an employee misses more than three (3) hours of work within a normal workday.

An absence of multiple days due to the same illness, injury or other incident will be counted as one occurrence for the purpose of this policy.

A tardy arrival, early departure or other shift interruption is considered a one-half occurrence. On occasion *and with prior approval by the Manager/Assistant Manager*, an employee who is tardy may adjust that day's schedule to work an equivalent amount of time at the end of the shift, and a one-half occurrence will not be counted.

Arrival and departure times will be determined by the time on the time recording system in each department. An employee is considered late if he or she reports to work more than five minutes after the schedules starting time; an early departure is one in which the employee leaves before the scheduled end of his or her shift.

If you are scheduled to work the day before or after a company paid holiday and call out sick, you will not be paid for that holiday nor will you be permitted to use any available PTO for that missed prior or after a holiday they will not be paid if that shift is considered a paid holiday. Where MA sick time law permits.

No Call/No Show

Not reporting to work and not calling to report the absence is a no call/no show and is a serious matter. The first instance of a no call/no show will result in a final written warning. The second separate offense may result in termination of employment with no additional disciplinary steps. **Any no call/no show lasting three days is considered job abandonment and will result in immediate termination of employment.**

If the employee has already begun the step discipline process for attendance/punctuality when a no call/no show occurs the disciplinary process may be accelerated to the final step.

Management may consider extenuating circumstances when determining discipline for a no call/no show (for instance, if the employee is in a serious accident and is hospitalized) and has the right to exercise discretion in such cases.

Procedures

The Assistant Manager, Manager, or Human Resources will deliver warnings as circumstances require.

Management reserves the right to use its discretion in applying this policy under special or unique circumstances.

Although occurrences will roll off an employee's record after twelve months, habitual offenders (those who have established a pattern of absences, such as consistently having six or more occurrences in any given six-month period or routinely calling off on Mondays and/or Fridays) may trigger step discipline even though twelve-month old infractions have fallen off, if he or she continues to incur occurrences.

Management reserves the right to amend or discontinue this policy at any time without notice.

Use of Trinity Property

The use of business telephone lines shall be restricted to business related calls only. Personal telephone calls, incoming or outgoing, must be limited to those that are of absolute necessity and should be as brief as possible. Long distance personal calls are strictly prohibited.

Employees may not use the business address for receiving personal mail and all personal outgoing mail should be pre-stamped and placed in the outgoing mailbox.

Personal use of business equipment must be approved in advance by the appropriate Manager/Assistant Manager and should occur at times other than normal working hours.

The use of personal equipment at the work site should only be done with the prior approval of the employee's Manager/Assistant Manager.

Though not inclusive the following are examples of abusing company property: marketing, defacing, damaging, writing or drawing on or upon Trinity property, including equipment, vehicles and facilities is strictly prohibited.

Using Trinity time, property uniforms, materials or facilities for purposes not directly related to Trinity business, including neglect, misuse or wastage of Trinity materials, property, tools or equipment, inflicting damage to, or failure to properly safeguard or protect Trinity property or other property (including, but not limited to, other employees' and customers' property) for which Trinity is responsible and/or liable is strictly prohibited.

Use of Trinity Lockers

To the extent lockers are made available to employees at any Trinity location, the following outlines the terms and conditions of the use of said lockers by Trinity employees: Lockers remain the property of Trinity even after assignment. Lockers are for FT employees only. Trinity reserves the right to rescind any locker at any time for any reason. Employees may not share or transfer locker(s) to any other employee at any time. Employees must stay in the locker assigned to them. Trinity reserves the right to enter any locker at any time for any reason and thus no expectation to privacy should arise. Trinity is not responsible for any lost or stolen items. Employees are required to keep a spare uniform in their locker at all times. No food is allowed to remain in the locker after the employee's shift is completed. There shall be no sticking or taping paraphernalia on the locker inside or out. No writings or markings are permitted on the locker inside or out. Employees are permitted use of a mirror inside the locker held on by a magnet.

Receiving Gifts

It is the policy of TRINITY that employees not accept gifts of any kind, including shares of stock or stock options, from vendors, suppliers, or any other organization or individual with a cash equivalent of \$250.00 or more, during any calendar year. Receiving such a gift and/ or failing to disclose, could result in disciplinary action up to and including termination.

Corrective Action

As a TRINITY team member, you are expected to:

- Render prompt, courteous, and efficient service to our customers
- Follow established policies and procedures
- Follow generally accepted standards of business behavior
- Comply strictly with all laws, rules, and regulations applicable to job related activities
- Perform all of your job duties in an acceptable manner

If any of the above expectations are not met, actions may be taken to address the issues.

“Corrective Action” refers to all actions taken to assist in correcting substandard job performance and /or unacceptable behaviors. Corrective actions may vary in severity from informal coaching and/or counseling, verbal warnings, written warnings, final written warnings, suspension pending investigation of circumstances, or termination of employment.

The level of discipline applied will depend on the facts and circumstances surrounding each situation. However, in accordance with the “Employment At-Will” policy outlined in this handbook, termination can, in certain circumstances, result without prior corrective action or warning. In addition, disciplinary steps may vary or be bypassed. It is important to note that the type of discipline applied to an employee, as well as any prior notice of discipline, is vested to the sole discretion of TRINITY.

Separation of Employment

The separation of employment may occur because of an employee’s resignation, discharge, or retirement. Discharge of an employee may be with or without cause or as a result of reduction in the work force. Discharge for cause may result from employee misconduct or unsatisfactory job performance.

Management reserves the right to terminate an employee when necessary and at its own discretion at any time and with or without notice.

Notice of Resignation

Employees who wish to resign their employment with TRINITY are asked to give written notice to their Manager/Assistant Manager at least two (2) weeks prior to the effective date of the resignation. In cases where fewer than two (2) weeks’ notice is provided, the employee may not be eligible for re-hire. Earned sick time is NOT paid out at time of separation.

Reduction in Force

Separation because of a reduction in work force will be effective only after management has made every reasonable effort to transfer the qualified employee to another currently available position within the organization.

The following criteria may be used to initiate a workforce cutback. The criteria are not presented in any particular order and management reserves the right to establish priority of any one or more criteria, depending on the situation.

- Job duties/responsibilities
- Job performance
- Employment history and tenure
- The ease of consolidating one job duty into another position
- Employee versatility and skills system demands

Call Backs

Consistent with work demands, or in accordance with applicable laws, TRINITY will consider calling back an employee who has earlier been “laid off”. TRINITY maintains no obligation to call back any employee.

Exit Interviews

An exit interview is generally conducted for employees who are voluntarily terminating employment. The HR Department will perform all exit interviews. A report on any significant observations arising from the interview will be given to the employee’s Manager/Assistant Manager.

Section 4
Compensation and Benefits

Paydays

Team members are normally paid once a week on Friday. If a regular payday occurs on a holiday, you will be paid on the last working day prior to the regular payday.

On each payday, you may access your pay statement showing gross pay, deductions and net pay by registering at www.ipay.adp.com.

Deductions such as contributions for the health and welfare benefit, Retirement plans, voluntary benefit plans and any other related benefits that may require a payroll deduction may be arranged through the HR/Benefits Department.

For your convenience, we offer direct deposit to your personal bank account. Direct deposit is both reliable and convenient and team members are encouraged to sign up for this service during the New Hire Orientation or anytime thereafter.

We are pleased to announce ADP iPayStatements, a new benefit for all employees. Through ADP, our payroll provider, we are able to offer you access to your earnings statements and W-2 forms 24 hours per day, 7 days a week. In addition, you can make changes to your W-4. Simply type in your changes, print the form, sign it and forward the completed form to your Payroll Department for processing. Please see the Director of Human Resources for instructions for setting up and logging into the ADP iPayStatements.

Time Clock Policy

In order to insure proper compensation for time worked, all employees should familiarize themselves with the following time clock policy:

At the beginning and end of each shift you must punch in and out according to the defined procedures. ***You cannot punch in earlier than 10-minutes prior to the start of your scheduled shift; violations to this guideline are subject to disciplinary action up to and including termination of employment.*** Should you be required to work additional consecutive shifts in the same office, you need to punch in and out only once. When working additional consecutive shifts at multiple offices, you must punch in at the beginning of your first shift and out at the end of your shift at the base where your rotation is completed.

If you forget to punch in or out you will need to contact a member of management to explain why you did not punch in or out and they will adjust your time accordingly.

Employees are forbidden to use another employee's identification number. Any employee found attempting to use another employee's identification number or fraudulently using the time clock will be subject to disciplinary action, up to and including termination.

Direct Deposit

Direct Deposit is highly recommended. Direct Deposit takes effect approximately two (2) weeks after employee submits a direct deposit form.

Overtime

On occasion, we may ask employees to work beyond their regular scheduled hours. We expect employees to work a reasonable amount of overtime-this is a job requirement. We will try to give employees advance notice when overtime work is necessary; however, it will not always be possible to notify workers in advance.

Exempt employees will not be paid for working beyond their regular scheduled hours. Nonexempt employees are entitled to payment for overtime, according to the rules set forth below.

- All overtime work must be approved in writing, in advance by the employee's Manager or Assistant Manager. Working overtime without permission violates Trinity policy and may result in disciplinary action. The Department Head must approve all employee requests for overtime in the department.
- For purposes of calculating how many hours an employee has worked in a day or week, our workweek begins at 0400 hrs on Monday and ends at 0359 hrs on Monday.
- Nonexempt employees will be paid 1 ½ times their regular hourly rate of pay for every hour worked in excess of 40 hours.

Paid or unpaid absences are not considered as time actually worked for purposes of computing overtime compensation. Local policies may make certain exceptions to this policy relative to holiday's condolence days, vacation time or other certain paid absences.

Exempt employees are not eligible to receive overtime compensation or compensating time off.

Wage Garnishments

A wage garnishment is an order from a court or a government agency directing us to withhold a certain amount of money from an employee's paycheck and sends it to a person or agency. Wages can be garnished to pay child support, spousal support or alimony, tax debts, outstanding student loans, or money owed as a result of a judgment in a civil lawsuit.

If we are instructed by a court or agency to garnish an employee's wages, the employee will be notified of the garnishment at once. Please note we are legally required to comply with these orders. If you dispute or have concerns about the amount of a garnishment, you must contact the court or agency that issued the order.

Health and Welfare Benefits

Because your health and welfare is of paramount importance to us, we provide comprehensive health insurance packages to employees who satisfy the eligibility requirements.

Eligibility:

Full-time employees and Part-time employees who are regularly scheduled a minimum thirty (30) hours per week are eligible to participate in the health benefits TRINITY offers. The effective date will depend on the requirements of each plan, but no employee will be eligible until after the completion of thirty (30 to 90) consecutive days of full-time employment.

The health care benefits offered to eligible employees may vary from time to time, they presently include the following:

- Medical Insurance
- Dental Insurance
- Life Insurance paid 100% by TRINITY
- Accidental Death and Dismemberment Insurance paid 100% by TRINITY
- Short Term Disability paid 100% by TRINITY
- Voluntary Optional Benefits

This brief description of the benefit plans is not meant to be a substitute for the plan documents, contracts, summary plan descriptions, etc.

The aforementioned benefits are subject to termination or change at TRINITY 's sole discretion, with or without notice, and are not earned nor vested by any employee.

If employees, due to absences, miss their share of medical/dental premiums beyond 2 pay periods payment arrangements must be made; if no payment arrangements are made and an employee misses their share of premiums beyond 30-days their insurance coverage may be terminated for non-payment of premiums and you will be offered COBRA coverage.

As with all of the policies in this handbook, our health care coverage may change at any time. For the most up to date information about your health care benefits, refer to the plan documents or contact the Human Resources Department.

Qualified Life Event Change

Normally, employees may only make changes to their benefit elections during the annual open enrollment period in March of every year. This is usually once a year and the time period may be communicated to the employee through various means, postings, mailings to the employee's home address TRINITY has on file and through the HR Department.

Changes between enrollment periods are allowed if the employee experiences a change in family status/ qualifying life event that affects access to benefits for themselves and/ or their dependents. Federal law considers the following events to be examples of a qualified change in family status:

- Marriage, divorce or legal separation;
- Birth, adoption, or the start of legal guardianship of your child;
- Employee's child marries, loses student status, or reaches the age limit;
- Death of your spouse or child;
- A court order to provide health coverage for the employee's child;
- Gain or loss of coverage due to a change in the employment or employment status of the employee, their spouse, or their dependent;
- A change in the employee's place of residence or work that impacts their choice of benefit plans.

Any change in coverage must be consistent with the reason that the change was permitted. The employee desiring to make the change must supply documentation of the change. Following are examples of documentation needed:

- Marriage or Divorce: Court Certified Marriage Certificate or Divorce Decree.
- Employee or spouse's employment status changes: Letter from previous or current employer reflecting date on which coverage will terminate.
- Employee acquires a new dependent: Birth certificate or adoption papers issued by the state.

The above documentation must be presented to TRINITY's HR Department after an employee has completed the automated enrollment. The supporting documentation must be received within thirty-one (31) days of the qualifying event date. Coverage will be made effective on the date of coverage loss with the exception for addition of newborns, which will be effective on the date of birth.

Reinstatement of Benefits

Full-time employees who are re-hired after a separation from TRINITY employment or full time employees who transfer to part time employment status and return to full time status within a six (6) month period of the same plan year may qualify to come back to the same or comparable health and welfare benefit elections, coverage and covered dependents as previously enrolled (this option must occur within the same plan year only).

COBRA and HIPAA Information

The Consolidated Omnibus Reconciliation Act (COBRA) of 1985 is a federal tax and benefit law mandated by the Internal Revenue Service. This act requires employers to offer continuation of applicable health benefits in certain circumstances to eligible employees and covered dependents (Qualified Beneficiaries) when you or the covered dependents would otherwise lose this group coverage under the plan with TRINITY.

An employee whose coverage would otherwise end under the employer group health plan may be entitled to elect a temporary continuation of coverage under COBRA. Coverage for dependents may also be continued if they were covered under the plan at the time.

The employee must elect continuation during the election period; premium payment is required; and the employee's coverage must have ended because of a life event known as a "Qualified Event." Specific qualifying events will be listed in the COBRA notice and you may at any time get an example COBRA notice by contacting the HR Director.

The Health Insurance Portability and Accountability Act of 1996, (HIPAA) was signed into law on August 26, 1996. It provides that group plans must comply with all nondiscrimination, pre-existing condition and crediting of prior health coverage requirements that were applicable at the beginning of the first plan year, starting after June 30, 1997. For example, if the plan starts a new plan year on January 1, HIPAA's provisions are effective January 1, 1998. This law includes important new provisions for individuals who move from one job to another, who are self-employed, or who have pre-existing medical conditions. HIPAA's provisions amend Title I of the Employee Retirement Income Security Act (ERISA) – as well as the Internal Revenue Service code and the Public Service Act – and place requirements on employer-sponsored group health plans, insurance companies and HMO's.

TRINITY EMS, Inc. 401(k) Plan

TRINITY has instituted an "ERISA Qualified Retirement Plan" commonly referred to as a 401(k) Plan. Under this type of plan, all eligible employees are automatically enrolled into the plan after completion of their 90-day orientation period; pre-paid contributions are initially made at 2% of the

employee's gross compensation. Employee's contributions are increased by 1% annually until contributions reach the maximum Trinity match of 5%. Employees wishing to decline from the plan or change the contribution rate must log on to the plan website. These payroll deductions are made on a pretax basis, thereby reducing your taxable income.

The purpose of the Plan is to allow you to plan and save for your retirement. When you retire, you will be eligible to receive the value of all contributions and the vested employer match, plus the accumulative investment growth on both.

The present Plan benefits include:

- Before-tax contributions and potential for tax-deferred earnings to help save for retirement
- Convenient payroll deductions to make retirement saving easier
- Rollover contributions permitted to keep your retirement savings in one convenient place
- Employer limited matching contributions to boost your personal savings
- Attractive investment options designed to meet your own investment strategy
- 24-hour electronic access to help you manage your account effectively
- Participant loans to provide short-term access to your retirement savings
- Hardship distributions available to help with certain financial needs
- Informative account statements to summarize your account activity

Plan Highlights

Eligibility

You are eligible to participate in the plan if you are at least 21 years old and have completed three months of employment.

The following employees are not eligible to participate in this plan:

- Leased employees
- Independent Contractors excluded even if later determined to be employees

Employee Contributions

Eligible employees may contribute from 1% to 80% of your eligible compensation by making pre-tax salary deferrals through regular payroll deductions, up to the current IRS maximum of \$18,500 per year (for 2018, may be increased in future years).

If you are age 50 or older, you are eligible to make "catch-up" contributions. Your pre-tax salary deferral maximum is \$24,500 or, if less, \$6,000 more than the amount determined by applying the plan's maximum deferral percentage times your salary. For example, if you earn \$20,000 and the plan limit is 15%, your maximum salary deferral is \$8,000 ($\$20,000 \times 15\% = \$3,000 + \$5,000 = \$8,000$). Maximum catch-up amounts may be increased in future years.

Eligible employees may increase or decrease contributions at any time and may stop contributing at any time. If you stop contributing to the plan, you may begin contributing again effective as of the first day of the plan quarter.

Rollovers

Rollovers from other permitted qualified plans will be accepted at any time.

Employer Contributions

TRINITY makes matching contributions each payroll period. There are no requirements for matching contributions if you retire, become disabled or die during the plan year. To receive a matching contribution, you must be contributing to the plan. You become 100% vested after 3 years of continued employment.

Refer to Plan Highlights brochure available in the HR Department for more details.

Section 5
Time Off

PTO (Paid Time Off)

PTO is accrued upon hire or transfer into a benefit-eligible position. Eligible employees must be scheduled to work at least forty hours per week on a regular basis. Employees working less than forty hours per week on a regular basis, on call and temporary employees are not eligible to accrue PTO. However, any Part-time or Per Diem employee will accrue one hour of sick time for every thirty hours of worked time up to forty hours a year.

In the first calendar year of employment Accrued PTO eligibility is determined by the month in which employment begins. PTO begins to accrue on date of hire and can be used beginning on the 91st day of continued employment.

Accruals are based upon paid hours up to 2080 hours per year, excluding overtime. Employees working 40 hours per week will earn PTO hours on a pro-rated basis, according to the accrual rate per hour (See Table). Length of service determines the rate at which the employee will accrue PTO.

Under this policy, employees will not be paid out any time not used: PTO will stop accruing once you have reached the maximum allotted accrual and annual cap. PTO may not be paid out while employed.

Years of Service	Accrual Rate per Hours worked	Annual PTO Accrual*	Annual Cap
0-12 months	0.02	5-days (40 hours)	40
1 st Year	0.02	5-days (40 hours)	80
2 nd to 4 th Year	0.0625	15-days (120 hours)	200
5 th to 9 th Year	0.08511	20-days (160 hours)	200
10 th year and up	0.1087	25-days (200 hours)	200

Employees are permitted to carry up to 200 hours of PTO, however once the annual cap is reached any hours worked will not calculate additional PTO until time is used.

Vacation Guidelines:

- a) A combination of three or more consecutive days is considered as vacation.
- b) A written request for vacation must be submitted to your Manager/Assistant Manager a minimum of 30 days in advance.
- c) Vacation is customarily approved on a “first come first served” basis. In certain circumstances, multiple requests for the same time period may need to be evaluated on a seniority basis.
- d) Individuals will be paid for the actual number of hours taken off as vacation, unless otherwise specified by the employee and approved by management.

MA Earned Sick Time

In accordance with M.G.L.c. 149 § 148C applies to all employees eligible to accrue and use earned sick time.

The time off provided may run concurrently with time off provided by the Family Medical Leave Act, the Massachusetts Parental Leave Act, the Massachusetts Domestic Violence Leave Act, the Small Necessities Leave Act and other leave laws that may allow employees to make concurrent use of leave for the same purposes as M.G.L.c 149 § 148C to receive pay when taking other statutorily authorized leave that would otherwise be unpaid.

1. An employee is eligible to accrue and use earned sick time if the employee's primary place of employment is Massachusetts.
2. The law provides the minimum requirements and employers may have more generous policies. Employers may have different policies for different categories of employees as long as the minimum requirements are met for all employees.
3. Using other paid time off (PTO) policies is permitted by law as long as employees can use the PTO (such as vacation time or personal leave) for the same purposes and with the same rights that they would be able to use earned sick time.
 - a. An employer may substitute an existing plan so long as employees:
 - i. Accrue at the rate of at least one hour of PTO for every 30 hours worked;
 - ii. May use up to 40 hours per year of PTO
 - iii. Are paid at least the amount that would be required for earned sick time;
 - iv. Can use PTO for the same purposes as earned sick time;
 - v. Receive a notice of their rights under the law; and
 - vi. Receive the same job protections
4. The law does not require employers to have separate leave policies. However, employers should have clear guidelines to ensure that their employees can accrue and use sick time consistent with the amounts and purposes articulated in the earned sick time law.
5. Employers that provide 40 or more hours of paid time off that also may be used as earned sick time are not required to provide additional sick leave to employees who use their time for other purposes and have need of sick leave later in the year. Employers must provide notice to employees that additional time will not be provided.
6. Employers can have different leave policies for different groups of employees, so long as all employees can use at least the same amount of time, for the same purposes, under the same conditions and with the same job protections provided in the law
7. An employee must make a good faith effort to provide notice of the need in advance of the use of earned sick time.
8. Employers may require up to seven days' notice if the employee has a pre-scheduled or anticipated time the employee plans to take off to use earned sick time.

9. If an employee is committing fraud or abuse by engaging in an activity that is not consistent with allowable purposes for earned sick time (e.g., being sick, caring for an ill family member) or by exhibiting a pattern of taking earned sick time on days when the employee is scheduled to perform duties perceived as undesirable, an employer may discipline the employee for misuse of earned sick time.

Sick Time Guidelines:

1. Employees calling out sick must notify their Manager/Assistant Manager as early as possible or within a minimum of one hour prior to the start of their regularly scheduled shift. This includes any regular or overtime scheduled shift.
2. Calling out sick the day before or after a holiday may result in loss of holiday pay.
3. Calling out sick on a holiday may result in loss of holiday pay and may include disciplinary action up to and including termination if applicable.
4. Employees calling out sick must request PTO or Earned sick time by submitting an email to their immediate manager.
5. Employees leaving prior to the end of their shift due to illness must request in an email that they want to use PTO or earned sick time.

Personal Time Guidelines:

A written request (email) for personal time must be submitted to your Manager/Assistant manager a minimum of one week in advance unless they are for emergency circumstances.

Personal time may not be taken to extend vacation time, but may be taken to extend bereavement time in special circumstances.

Bereavement Time

Bereavement is separate from PTO. The following guidelines apply:

Immediate Family Member 3- consecutive days
Extended Family Member 1 day

Definition of Immediate Family Member: mother, father, sister, brother, spouse, son, daughter, mother-in-law or father-in-law.

Definition of Extended Family Member: grandparents, bother-in-law or sister-in-law

You will only be paid for the actual shifts you miss up to the number of days allowed. If more time is needed, you may use your Paid Time Off. Additional time off may be extended without pay based on individual case/need.

Family and Medical Leave Act (FMLA)

Employees who have been employed by TRINITY for at least one (1) year and have worked 1,250 hours over the previous twelve (12) months, are eligible for up to twelve (12) weeks of unpaid leave during any rolling 12-month period under the Family Medical Leave Act (“FMLA”). The following events qualify an eligible employee for FMLA leave:

- The birth, adoption or foster care placement of a child, if the leave is taken within 12 months of the birth, adoption or placement
- The serious medical condition of a parent, spouse or child (under the age of 18 or an adult child who cannot care for him/herself)
- The worker’s own serious medical condition that prevents him or her from performing the functions of his/her job

FMLA defines a “serious health condition” as an illness, injury, impairment or physical or mental condition that involves:

- In-patient care in a hospital, hospice or residential medical facility
- Continuing treatment by a healthcare provider

Not all conditions are covered. If you have questions about what qualifies as a serious health condition, contact the HR Director.

For the duration of FMLA leave, your medical insurance coverage under any group health plan must be maintained under the conditions coverage would have been provided if you had continued working. You should contact the HR Department to discuss payment of premiums and the effect of your failure to return from leave.

As a condition of a FMLA leave and in consideration of the waiting period of Trinity’s short-term disability insurance, at least forty (40) hours of any available PTO may be paid out according to those partial scheduled days not worked.

Employees requesting FMLA must submit a request for FMLA to their Manager/Assistant Manager at least thirty (30) days in advance, if possible.

An employee seeking medical leave under the FMLA must provide written certification by a physician or practitioner. Employees who are eligible for intermittent leave under the FMLA must also demonstrate medical necessity before a reduced schedule will be granted. TRINITY reserves the right to request a second medical opinion at TRINITY’s expense.

In the event that the second opinion differs from the certifying doctor, a third opinion may be requested by TRINITY.

Employees returning from FMLA leave will be reinstated in their former position or an equivalent position with the same benefits and compensation. Employees who continue on leave after twelve (12) weeks may not be guaranteed a position will be available when they are ready to return. If an employee on FMLA does not return to work, the employee must reimburse TRINITY for any employee portion of the insurance premium paid during the leave.

Employees out on leave beyond 30-days will have their review date adjusted according to the total time out on leave calculating on day 31 and forward.

Massachusetts Small Necessities Leave Act

The SNLA (Small Necessities Leave Act) grants an FMLA-eligible employee a total of twenty-four (24) hours of unpaid leave during a rolling 12-month period, in addition to leave under FMLA to:

- 1) Participate in school activities directly related to the “educational advancement” of the employee’s own son or daughter, such as parent-teacher conferences or interviewing for a new school;
- 2) Accompany the employees son or daughter to routine medical or dental appointments such as checkups or vaccinations; or
- 3) Accompany an “elderly relative” of the employee to routine medical or dental appointments or appointments for other professional services related to the elder’s care, such as interviewing at nursing or group homes.

An employee who wishes to take SNLA leave must give at least seven (7) days’ notice if the leave is foreseeable. If it is not foreseeable, the employee must give “such notice as is practicable”. The employee may substitute PTO for unpaid leave.

Worker’s Compensation:

If you suffer an illness or injury that arose during the course of your employment, you may be eligible for worker’s compensation benefits. Worker’s compensation will pay for certain medical care and lost wages resulting from job-related illness or injuries.

If you are injured or become ill through work you must report the illness or injury regardless of the severity to a Manager or Assistant Manager, or Human Resources immediately.

For initial treatment you must be seen at AFC Urgent Care in Chelmsford or Occupational Health and Acute Care in Salem, NH unless you have life threatening injury or emergent circumstances require that you go to the closest emergency room.

If you are seen at the emergency room because Occupational Health is closed, you must make a follow-up appointment with one of the above stated facilities on the next business day.

You may follow-up with your own physician after being seen by one of the above facilities and you must continue treating within the requirements of the Worker’s Compensation Insurance Company.

If an injury results in lost-time from work exceeding the 5-day state mandatory waiting period, a representative from the worker’s compensation insurance company will contact you.

During the State of Massachusetts 5-day waiting period of a lost time claim your wages may be paid with available PTO time. Beyond 5-days, your lost wages will be paid by the worker’s compensation carrier at the state of Massachusetts allowed rate based on your past 12-month wages.

You must cooperate with Human Resources and the Worker’s Compensation Insurance Company at all times. Human Resources should receive all doctors’ notes and a minimum of one phone call per week with an updated status of your condition.

Light duty is not available at TRINITY; however, we do work in conjunction with non-profit organizations from time to time when they are able to accommodate an injured employee's restriction.

You must provide Human Resources with a doctor's note releasing you for full-duty without restrictions prior to returning to work.

Worker's Compensation and Family Medical Leave

An employee may be on a "workers compensation" absence due to an on the job injury or illness that also qualifies as a serious health condition under the Family Medical Leave Act. The "workers compensation" absence and the family medical leave will run concurrently subject to proper notice by TRINITY. Proper notice may be a Personnel Action Notice (PAN) or any other type of written notice signed by a TRINITY member of the management team.

At some point the health care provider providing medical care pursuant to the worker's compensation injury may certify the employee is able to return to work in a transitional duty position. If TRINITY offers such a position, the employee is permitted, but not required, to accept the position.

As a result, the employee may no longer qualify for payments from the worker's compensation benefit plan, but the employee is entitled to continue on an unpaid family medical leave either until the employee is able to return to the same or equivalent position the employee left or until the 12-week family medical leave entitlement is exhausted.

Employees out beyond 30-days will have their review date adjusted according to the total time out on leave calculating on day 31 and forward. Example: an employee is out for a total of 45-days; adjustment time would begin calculation on day 31, so the employees review date would be adjusted by 15-days beyond the current review date.

State Law

The Federal Family and Medical Leave Act (FMLA) does not supersede any provision of a state or local law that provides greater family or medical leave rights than the Act provides. Employers are required to apply provisions of state family leave/medical laws, if they are more generous to the employee requesting the leave.

For more information on this important benefit, contact the HR Department.

A. Leave of Absence (LOA)

In emergencies, and under certain other conditions, provisions may be made to protect the continuous service rights or eligible team members who have successfully completed their training/introduction period, and who must, for some period of time, and for good reason, stop working. Each situation is judged and reviewed on an individual basis and on its merits.

In the event TRINITY agrees to allow an employee to take a leave of absence, as a condition of all leaves of absence and in consideration of the waiting period of Trinity's short-term disability insurance, at least forty (40) hours of available PTO may be paid out as part of each leave of absence. Any additional use of PTO during the leave will be at the option of the employee. In the case of an intermittent leave where the employee may work only partial days (such as provided by the Family

and Medical Leave Act), the equivalent of at least forty (40) hours of any available PTO will be paid out according to those partial scheduled days not worked. You will not accrue PTO during the period of leave and will not be paid holiday pay while on leave. Leave of Absences are typically granted for a maximum of 30-days, employees will be reinstated in their former position or an equivalent position based on schedule availability and depending on the approved length of absence.

B. Military Leave

Military Leave will be granted in accordance with the Uniform Services Employment and Reemployment Rights Act of 1994. Employer provided benefits will continue so long as the employee is on active-duty, up to a total of eighteen (18) months. Employees are not paid during military leaves. PTO can be used in accordance with Trinity policy.

C. Jury Duty Leave of Absence

In the event an employee is called for jury duty, the employee must notify his/her Manager/Assistant Manager immediately upon receipt of such notice. For those days that the full-time employee must serve on jury duty, which were regularly scheduled work days, the employee will be paid his/her regular base pay, on an hour for hour basis, for each hour spent on jury duty. The full-time employee will be required to submit proof of service to the HR Department. The full-time employee shall be required to work when he/she is not required to be in court. TRINITY will pay for up to ten days of jury duty annually less any jury duty pay. Jury duty beyond this time is without pay from TRINITY

Overtime pay is not compensable during this type of leave.

Temporary personnel are excluded from receiving any paid time off for a jury leave and this benefit is for full-time employees only.

D. Bereavement Leave of Absence

In the event of a death in your immediate family, full-time employees are currently granted three days to attend the funeral. Trinity at the employee's regular rate of pay will pay any scheduled shifts that occur within those three consecutive days. In the event of a death of your extended family, full-time employees are currently allowed one day to attend the services. Trinity will pay at the employees, regular rate for One (1) day.

Please refer to the Family Medical Leave Act section of this handbook for detailed definitions of "family members" covered.

E. Workers Compensation Leave of Absence

You may be on a "workers compensation" leave of absence, which also qualifies as a serious health condition under the Family Medical Leave Act. The workers compensation leave of absence will run concurrent with any other qualified leave of absence, subject to proper notice by TRINITY. Proper notice may be a Personnel Action Notice (PAN), or any other type of written notice signed by a TRINITY member of the management team.

Employees on a workers compensation leave of absence will be allowed to return to their regular job classification and job assignment only upon successful passing of fitness-for-duty examination performed by a TRINITY Occupational Health Provider or a physician chosen by TRINITY.

Employees who have voluntarily resigned due to expiration of a workers compensation leave of absence will be welcome to apply for the next advertised opening in their original job classification,

after successfully completing the pre-employment testing requirements. TRINITY does not guarantee re-hire employment to any individual.

F. Administrative Leave

Trinity may place employees on administrative leave of absence, for a limited period of time, pending the completion of an investigation of alleged policy violations or other serious performance issues. An employee will be placed on administrative leave when Trinity's ability to perform appropriately or Trinity would be subject to further liability if the employee was permitted to continue interacting with the public and /or employees while working. Under most circumstances Administrative leaves are unpaid.

NOTE: Employees are required to notify their immediate Manager/Assistant Manager and Human Resources in the event that a leave listed above is requested. Failure to provide appropriate notice and documentation may be grounds for disciplinary action up to and including termination or reinstatement of employment.

Benefits During Leave

The health and welfare benefits for employees on an approved leave of absence may be continued or revoked at their request.

Team members may continue health benefits for the duration of the approved leave of absence to a maximum of twelve (12) months. You must make your contributions for these benefits, as outlined below. Any late contributions may result in a discontinuation of benefits.

You are responsible for your share of premiums. TRINITY will continue to contribute its share of the premium. While on leave, your share of premiums must be paid by the method normally used during any paid leave. If you do not make the premium payments for more than thirty (30) days, TRINITY may have no alternative other than to discontinue your health coverage.

You do not accrue PTO during the period of leave and are not paid holiday pay while on leave.

If benefits are discontinued, team members and /or their qualified dependents will be offered continuation of benefits as provided for in the Internal Revenue Code Section 162(k), Consolidation Omnibus Budget Reconciliation Act of 1985 (COBRA).

Employer matching contributions to the TRINITY 401(k) Plan will not be made during any Leave of Absence. Team members are eligible to resume participation in these plans as provided for in the plan document. 401(k) loan payments may be suspended for up to one year during a leave of absence.

It is very important that you contact HR if you are going to apply for a Leave of Absence. They will provide you with very important information regarding premium payments, and your options on how to remit payment, termination of benefits or reinstatement of benefits.

HANDBOOK ACKNOWLEDGMENT FORM

By signing this form, I acknowledge that I have received a copy of Trinity’s Employee Handbook. I understand that it contains important information about Trinity’s policies, that I am expected to read the Handbook and familiarize myself with its contents, and that the policies in the Handbook apply to me and my continued employment with TRINITY is contingent upon my abiding by the provisions contained herein. I understand that nothing in the Handbook constitutes a contract or promise of continued employment and that Trinity may change the policies in the Handbook at any time.

By signing this form, I acknowledge that my employment is at will. I understand that I have the right to end the employment relationship at any time and for any reason, with or without notice, with or without cause, and that Trinity has the same right. I acknowledge that neither Trinity nor I have entered into an employment agreement for a specified period of time, that only John Chemaly and Gary Sepe may make any agreement contrary to the at-will policy, and that any such agreement must be in writing, signed by myself and TRINITY.

Employee’s Signature Date

Employee’s Name (Print)