



The Wright Way Company Inc.

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wrightwayco.com



Employee Handbook

I. General Provisions

This handbook serves to inform employees of The Wright Way Company of the policies and procedures of this company and to establish the company's employee expectations. This handbook is not all-inclusive or intended to provide strict interpretations of our policies; rather, it offers an overview of the work environment. This handbook is not a contract, expressed or implied, guarantying employment for any length of time and is not intended to induce an employee to accept employment with the company.

As a service-oriented company, our employees are the heart of our business. Strong employee performance is critical to our success, but just as important is how we go about achieving results — with honesty and respect, without taking shortcuts, and by operating ethically and with integrity in all that we do. The success of our business is dependent on the trust and confidence we earn from our employees, customers, clients, and contractors. We gain credibility by adhering to our commitments, displaying honesty and reliability and reaching company goals solely through honorable conduct.

As an employee of The Wright Way Company Inc., you are the public face of our company. Your presence, appearance, actions, and demeanor significantly affect our standing and reputation. As such, we ask that you always try to present yourself to our clients in the best light possible and represent us admirably to the best of your abilities. As front-line representatives of our company, we ask that you act as ambassadors of respectability and convey our corporate image to everyone you encounter.

Below are some basic duties and expectations designed to help you achieve these results.

II. Legal and Regulatory Compliance

Our commitment to integrity begins with complying with all laws, rules, statutes, and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific job and role. Violations of applicable laws, rules, statutes, or regulations will not be tolerated at the Wright Way Company, and such violations may be deemed grounds for reprimand or dismissal. If you are unsure of whether a

specific action is permitted by law or company policy, you should seek advice from supervisors and management. Every employee is responsible for preventing violations of law and for speaking up if they see possible violations.

III. Employer-Employee Relationship

The relationship created between The Wright Way Company and its employees shall be considered an 'employment-at-will' relationship. Either WWC or the employee can terminate the employment relationship at any time, with or without cause, with or without notice. This employment at-will relationship exists regardless of any other statements or policies contained in this handbook, other company documents, and/or any verbal statement to the contrary. While WWC may elect to follow its progressive discipline procedure, it is in no way obligated to do so. Using progressive discipline is at the sole discretion of WWC and its management.

IV. Equal Employment Opportunity

The Wright Way Company abides by Equal Employment Opportunity (EEO) laws and provides equal employment opportunities to all employees and applicants for employment and prohibits discrimination and harassment of any type without regard to race, color, religion, age, sex, national origin, disability status, genetics, protected veteran status, sexual orientation, gender identity or expression, or any other characteristic protected by federal, state or local laws. This policy applies to all terms and conditions of employment, including recruiting, training, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, and compensation.

Additionally, whenever possible, our company makes reasonable accommodations for qualified individuals with disabilities under the Americans with Disabilities Act (ADA) to the extent required by law. Employees who would like to request a reasonable accommodation should inform management and specify the nature of the request.

V. Attendance and Punctuality

Employees are expected to adhere to their designated work schedules, maintain excellent work attendance, and be punctual in attendance. This means being at work at starting time each day. If you are unable to report to work for a scheduled shift for any reason, you must contact the Wright Way Company office before the start of your scheduled work shift. Failure to do so will be deemed a 'No call/No show' and grounds for termination. Also check with your supervisor to see if your department has additional call-in requirements.

VI. Fitness for Duty

Employees are expected to be mentally and physically fit for work, to report to work fit for duty, and to remain fit while on duty. While on duty, employees may not be under the influence of

alcohol or any drugs that impair their ability to perform their work safely and efficiently. Employees must perform their duties in a manner that will not jeopardize the health and safety of those around them.

VII. Dress Code

The Wright Way Company recognizes that deciding how to dress for work is a personal decision, but we ask you to recognize and respect that the dress choices you make affect not only your own comfort but that of your colleagues, the workplace environment, and the image WWC conveys to clients, potential clients, and workplace visitors. Accordingly, all WWC employees must dress in appropriate attire while at work or engaged in work-related activities.

The dress code for each employee will be job-specific. Different dress codes will apply to different companies and industries, but generally speaking, WWC employees are required to maintain an appearance of professionalism. Employees working offsite at third-party workplaces must check with their designated workplace supervisor to find out that company's dress code and PPE requirements. Employees working on-site at WWC offices are required to abide by the following:

Acceptable attire for men: dress shirts, Polo shirts, dress pants (khakis, chinos, Dockers, slacks) blazers, suits, sports coats, ties, dress shoes.

Acceptable attire for women: blouses, sweaters, dress shirts, dress pants, dresses, skirts (not too short or too tight).

Unacceptable attire: shorts, sweatpants, provocative attire (including mini-skirts, short sundresses, spandex, bicycle shorts, short-shorts, see-through, midriff baring, underwear baring, or other revealing or suggestive articles), sleeveless shirts, tank tops, tube tops, halter tops, tops with spaghetti straps, off the shoulder tops, sandals, flip flops, shower caps, do rags, scullies, derogatory clothing, sloganed t-shirts, tennis shoes, rumpled/wrinkled/ripped articles., sloppy or unkempt clothing, or other attire considered inappropriate to a professional business environment.

Requests for accommodation. WWC will enforce the dress code consistently but in a way that respects the personal circumstances of each employee, including his/her race, religion, gender, physical/mental condition, nationality, family status, etc. Employees may request exemptions or accommodations to the dress code on these and other grounds, and all requests for accommodation will be seriously considered based on the particular circumstances involved.

VIII. Harassment and Discrimination

The Wright Way Company is committed to maintaining a work environment that respects individual differences. Conduct yourself in a professional manner and treat others with respect,

fairness, and dignity. WWC does not tolerate harassment or discrimination, including any behavior, comments, jokes, hazing, slurs, email messages, pictures, photographs, or other conduct that contributes to an intimidating or offensive environment. No forms of harassment or discrimination will be tolerated, and such conduct may result in termination.

The Wright Way Company prohibits discrimination or harassment based on race, color, religion, creed, sex, national origin, age, disability, marital status, veteran status or any other status protected by applicable law. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and is free from discriminatory practices, including without limitation, harassment. Consistent with its workplace policy of equal employment opportunity, WWC prohibits and will not tolerate harassment on the basis of race, color, religion, creed, sex, national origin, age, disability, marital status, veteran status or any other status protected by applicable law. Violations of this policy will not be tolerated.

Discrimination includes, but is not limited to, making any employment decision or employment related action based on race, color, religion, creed, age, sex, disability, national origin, marital or veteran status, or any other status protected by applicable law. Harassment is generally defined as unwelcome verbal or non-verbal conduct, based upon a person's protected characteristic, that denigrates or shows hostility or aversion toward the person because of the characteristic, and which affects the person's employment opportunities or benefits, has the purpose or effect of unreasonably interfering with the person's work performance, or has the purpose or effect of creating an intimidating, hostile, or offensive working environment. Harassing conduct includes but is not limited to: slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes and display or circulation in the workplace of written or graphic material that denigrates or shows hostility or aversion toward an individual or group based on their protected characteristic.

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors and other verbal, visual or physical conduct of a sexual nature, when: (i) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (ii) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (iii) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment. Examples of sexual harassment include: unwelcome or unsolicited sexual advances; displaying sexually suggestive material; unwelcome sexual flirtations, advances or propositions; suggestive comments; verbal abuse of a sexual nature; sexually oriented jokes; crude or vulgar language or gestures; graphic or verbal commentaries about an individual's body; display or distribution of obscene materials; physical contact such as patting, pinching or brushing against someone's body; or physical assault of a sexual nature.

Any company employee who feels that he or she has been harassed or discriminated against or has witnessed or become aware of discrimination or harassment in violation of these policies,

should bring the matter to the immediate attention of his or her supervisor. WWC will promptly investigate all allegations of discrimination and harassment and take action as appropriate based on the outcome of the investigation. An investigation and its results will be treated as confidential to the extent feasible, and the company will take appropriate action based on the outcome of the investigation. No employee will be retaliated against for making a complaint in good faith regarding a violation of these policies, or for participating in good faith in an investigation pursuant to these policies.

IX. Tobacco Products

The use of tobacco or smoking-related products is prohibited within all buildings and facilities that are owned, rented, leased, or otherwise controlled by The Wright Way Company. WWC may designate appropriate outdoor areas (if any) that are approved to accommodate the use of tobacco or smoking-related products. Signage will indicate areas where such use is acceptable. Individuals who choose to use tobacco or smoking-related products in designated areas are expected to place remains in proper receptacles. Littering the premises with remnants of tobacco or smoking-related products is also prohibited. WWC employees working off-site at third party jobsites must follow the tobacco policies in place at those workplaces.

X. Drugs and Alcohol

The Wright Way Company does not tolerate the use of drugs and/or alcohol at work or during work-related activities. Do not report to work under the influence of alcohol or drugs. You may not consume alcohol while on duty (including lunches and/or breaks). Never use, possess, sell, offer to sell, transfer, provide, share, or purchase illegal drugs while on duty or be in possession of, or under the influence of, any medication prescribed for someone other than you. You also must comply with your specific jobsite's alcohol and drug standards and any other fitness-for-duty regulations that apply to your job.

XI. Safety Protocols

The Wright Way Company takes all safety issues seriously. The safety of the public, employees, clients, and contractors is our highest priority. WWC's commitment to a 'safety always' culture is reinforced through our 'Safety Awareness and Training' program. Violations of safety protocols will result in discipline and/or termination anytime an employee acts in a reckless manner (or demonstrates a pattern of carelessness or non-compliance) which puts the employee, their coworkers, or the public at risk.

Additionally, we encourage open and honest communications on safety, so that we can identify and eliminate unsafe situations and avoid potential incidents and injuries. To enhance safety and prevent future incidents, we adopt a voluntary non-punitive self-reporting system for unsafe

occurrences and hazardous situations. If you witness or perceive potentially dangerous conditions or situations, please report it to supervisors or management.

XII. Weapons in the Workplace

WWC employees may not possess, carry, store, or use any type of weapon on any WWC property or WWC contracted jobsite, whether on or off duty. A “weapon” is a knife, firearm, ammunition, explosive, or other device that can be construed as a weapon; however, the definition of weapon does not include tools that are used for legitimate work-related purposes.

XIII. Theft

As stewards of organizational resources, all employees of The Wright Way Company are responsible to safeguard against waste, loss, theft, destruction, or misuse of resources under their control. Every employee is responsible for the proper use, maintenance, and preservation of company assets (e.g., materials, equipment, tools, property, etc). Please do your part to protect the company’s assets and ensure their efficient use.

XIV. Payroll

The Wright Way Company Inc. employees are paid through ADP payroll services using either direct deposit (funds are deposited directly into the employee’s bank account) or the ADP ALINE Card. Paychecks are distributed every two weeks. The paycheck will reflect work performed for the previous period. Paychecks include salary or wages earned less any mandatory or elected deductions. Mandatory deductions include federal and state withholding tax and other withholdings for insurance. Elected deductions are deductions authorized by the employee, and may include, for example, contributions to benefit plans. If the employee desires to have their earnings deposited directly into their bank account, the employee must fill out and submit a Direct Deposit form specifying the account into which they wish to have their earnings deposited. Direct Deposit forms are available upon request.

Employees must coordinate with their on-site supervisors to ensure he or she (the employee) has a time card every week. The hours the employee worked for that week must be logged, certified, and returned to The Wright Way Company for processing. Completed time cards should be scanned and submitted back to The Wright Way Company by noon on Monday in order for the employee to be paid on Friday. Time cards for the preceding week not received by noon on Monday will result in the employee being paid the following week. Supervisors must sign and verify all hours worked for the employee to be properly paid.

If the employee is eligible for reimbursement of expenses, and wishes to file for reimbursement, the employee needs to fill out a separate expense report and submit it in addition to his or her time card. Employees must submit receipts to verify all expenses to be reimbursed. Employees must put their name at the top of each receipt and all receipts for the preceding week must be

submitted to the payroll department by 12:00 noon on Monday to be included in the current week's payroll. The date of purchase and the nature of the expense must be visible on the receipt in order to be eligible for reimbursement.

Employees should contact Human Resources to obtain the necessary authorization forms for requesting additional deductions from their paychecks. Notify a supervisor if a paycheck appears to be inaccurate or has been misplaced. Advances on paychecks are not permitted. Information regarding final paychecks can be found under the termination section of this handbook. Any change in name, address, telephone number, marital status or number of exemptions claimed by an employee should be reported to WWC immediately.

XV. Personnel Files and Privacy

The Wright Way Company maintains a personnel file on each employee. These files are kept confidential to the extent possible. Employees may review their personnel file upon request. It is important that personnel files accurately reflect each employee's personal information. Employees are expected to inform the company of any change in name, address, home phone number, home address, marital status, number of dependents or emergency contact information. The company retains the right to access all company property including computers, desks, file cabinets, storage facilities, and files and folders, electronic or otherwise, at any time. Employees should not entertain any expectations of privacy when on company grounds or while using company property. All documents, files, voice-mails and electronic information, including e-mails and other communications, created, received or maintained on or through company property are the property of the company, not the employee. Therefore, employees should have no expectation of privacy over those files or documents.

XVI. Work Performance

The Wright Way Company expects every employee to act in a professional manner. Employees should always attempt to achieve their job objectives and act with due diligence and suitable consideration. Poor job performance can result in disciplinary action, up to and including termination.

The Wright Way Company may periodically evaluate an employee's performance. The goal of a performance review is to identify areas where an employee excels and areas that need improvement. The company uses performance reviews as a tool to determine pay increases, promotions and/or terminations. Employees should note that a performance review does not guarantee a pay increase or promotion. Written performance evaluations may be made at any time to advise employees of unacceptable performance. Evaluations or any subsequent change in employment status, position or pay does not alter the employee's at will-relationship with the company. Forward any questions about performance expectation or evaluation to the supervisor conducting the evaluation.

XVIII. Discipline

The Wright Way Company reserves the right to discipline and/or terminate any employee who violates company policies, practices, or rules of conduct, at any time, with or without written notice. Poor performance and misconduct are also grounds for discipline or termination. The following actions are unacceptable and considered grounds for disciplinary action.

This list is not comprehensive; rather, it is meant merely as an example of the types of conduct that this company does not tolerate. These actions include, but are not limited to: engaging in acts of discrimination or harassment in the workplace; possessing, distributing or being under the influence of illicit controlled substances; being under the influence of a controlled substance or alcohol at work, on company premises, or while engaged in company business; unauthorized use of company property, equipment, devices or assets; damage, destruction or theft of company property, equipment, devices or assets; removing company property without prior authorization or disseminating company information without authorization; falsification, misrepresentation or omission of information, documents or records; lying; insubordination or refusal to comply with directives; failing to adequately perform job responsibilities; excessive or unexcused absenteeism or tardiness; disclosing confidential or proprietary company information without permission; illegal or violent activity; falsifying injury reports or reasons for leave; possessing unauthorized weapons on premises; disregard for safety and security procedures; disparaging or disrespecting supervisors and/or co-workers; and any other action or conduct that is inconsistent with company policies, procedures, standards or expectations.

The foregoing list exhibits the types of actions or events that are subject to disciplinary action. It is not intended to indicate every act that could lead to disciplinary action. The company reserves the right to determine the severity and extent of any disciplinary action based on the circumstances of each case, instance, or infraction. Disciplinary action is any one of several options used to correct unacceptable behavior or actions. Discipline may take the form of oral warnings, written warnings, probation, suspension, demotion, discharge, removal or some other disciplinary action, in no particular order. The course of action will be determined by the company at its sole discretion as it deems appropriate.

XIX. Termination

Employment with The Wright Way Company is on an at-will basis and may be terminated voluntarily or involuntarily at any time. Upon termination, an employee is required: to continue to work until the last scheduled day of employment; to turn in all reports and paperwork required to be completed by the employee when due and no later than the last day of work; and to return all equipment or other property belonging to the company that are in the employee's possession, custody, or control. WWC recognizes that personal situations may arise which require a voluntary termination of employment. Should this occur, the company requests that the employee provide two weeks advance notice in writing.

XX. Collateral Issues

This manual is intended to serve as a general guide instructing employees in basic behaviors and expectations. It is not designed to cover all situations and scenarios. From time to time, questions and issues will arise that are not specifically addressed herein. In those instances, employees should seek guidance and instruction from supervisors and management. Employees must also follow all rules and regulations posted elsewhere, including the rules and regulations of third party companies and employers with which The Wright Way Company does business, at third party jobsites, and/or elsewhere.



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Employee Code of Conduct

Jobsite Do's and Don'ts

Do's:

- Obey all laws, rules, statutes, and regulations where we do business.
- Obey all workplace policies and regulations of the company where you are placed.
- Present yourself properly while on the job (be appropriately dressed, well groomed, hygienic, etc.)
- Be polite and courteous and act in a respectful manner
- Maintain honesty and integrity at all times
- Maintain attendance and punctuality
- Wear all required PPE at all times (safety glasses, gloves, hard hat, boots, etc)
- Obey all safety protocols

Don'ts:

- Do not use a cell phone while you are on the clock. Personal cell phones should be silenced and stored away at all times while you are working. You may make calls or check your messages only during authorized breaks (e.g. lunchtime). Otherwise, the employer should never see it.
- Do not have visitors on the jobsite or workplace.
- Do not shirk responsibility, engage in 'slacking', lay low to avoid work, sleep on the job, etc.

Never

In order to preserve its integrity and reputation within the community, Wright Way Staffing has a "zero tolerance" policy against certain actions and behaviors that are deemed to be inexcusable and will result in 'Termination for Cause'. Serious violations that will result in automatic termination of employment include:

- Theft of property
- Possession, use, solicitation, or sale of drugs and/or alcohol
- Arguing, back-talking, disrespecting your employer, coworkers, or others • Violence, threats of violence, intimidation, menacing, hazing, bullying, etc.
- Possession of weapons (guns, knives, or other dangerous weapon)
- Using crude, obscene, offensive, or derogatory language
- Making sexually inappropriate advances, gestures, comments, jokes, or suggestions
- Possessing sexually suggestive or explicit materials
- Lying to employers or supervisors



• Falsification of company records (time cards, work orders, invoices, etc)

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Acknowledgment of Receipt of Employee Handbook

Acknowledgment

I acknowledge that I have received a copy of The Wright Way Company Employee Handbook and that I am responsible for reading and learning the information contained therein. I understand that the handbook is intended to provide me with a general overview of the company’s policies and procedures. I further understand that I am expected to abide by, and fully comply with, all the terms, policies, and conditions outlined with the handbook.

I understand and accept that my employment with The Wright Way Company is at-will and that I have the right to resign at any time, with or without cause, just as the company may terminate my employment at any time, with or without cause or notice, subject to applicable laws.

I understand that nothing in the handbook or in any oral or written statement alters the at-will relationship.

I acknowledge that the company may revise, suspend, revoke, terminate, change or remove, prospectively or retroactively, any of the policies or procedures outlined in this handbook or elsewhere, in whole or in part, with or without notice at any time, at the company’s sole discretion.

Employee’s Printed Name

Employee’s Signature

Date