

EMPLOYEE CULTURE BOOK

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It All Starts with Values



It's about people

- People define every part of our business. Growth potential is based on the abilities and personalities of the people involved. Technology solutions are a part of the equation, but it's the people in an organization that define its true security. We work hardest when we're supporting one another. We take care of each other; we take care of our families, and in doing so we take better care of our customers.



Fear is the mind killer

- We don't let fear define the need for our services and we don't present a problem without discussing realistic response or mitigation options. There's more than enough to worry about in life and plenty of people telling us to be afraid. We're solutions people, not fear mongers.



Strong opinions lightly held

- Opinions are important—they coalesce facts, reason, experience, and judgment into actionable points of view. We present our opinions with logic and reason rather than emotions, offering several alternatives to each challenge and the supporting data. The rejection of an idea is not a rejection of the individual or their merit. Everyone has a voice and a chance to speak, regardless of title, station, or seniority.



Quality over speed, speed over cost

- Every organization must consciously balance quality, speed, and cost. We will always put the quality of our work first. We make great efforts to move quickly, but never at the expense of quality. While we strive to keep our services affordable, we never choose an inexpensive alternative that will adversely impact quality or speed.



Cool heads, warm hearts

- We keep a cool head and help others do the same, especially in a crisis. We approach adversity with patience, logic, and understanding. Mistakes happen; we don't hide, ignore, condemn, or fear them. Mistakes are opportunities to exemplify honesty, accountability, professionalism, tolerance, and grace. Instead of pointing a finger, we use humor, empathy, and fun when it matters most.



R-E-S-P-E-C-T

- We treat each other how we hope to be treated. We don't yell; we aren't condescending, and we always try to understand the other person's perspective, before reacting to it. We keep it light, and we listen. We extend this principle to our customers, and we understand that talking down to them is the easiest way to send them to a competitor.



Tomorrow just happened

- Life is what happens when we're busy making other plans. We work hard on today but we're always thinking about the future. We take extra time to make sure we're learning and looking ahead. No matter what your discipline or area of expertise, you're adding your capabilities to the long-term plan for the organization and its clients.

Introduction

This Culture Book provides direction for managing and developing staff. It is in no way a contract of employment. All policies are current and relevant and will be reviewed periodically for updates. These policies and procedures apply to all employees. No Culture Book can anticipate every circumstance or question about employment, so ProCircular reserves the right to revise, supplement, or rescind any portion of this Culture Book at any time. Employees will be notified of all changes as they occur. ProCircular complies with all Federal and State Laws. The policies and procedures outlined in this Culture Book are predominately for the state of Iowa as that's where the Headquarters is. Please refer to additional information at the end of this Culture Book relating to state specific policies.



At-Will Employment

Your employment with the Company is "at-will" and entered voluntarily. You are free to resign at any time, for any reason, with or without notice. Similarly, the Company is free to conclude the employment relationship at any time. Written or oral statements made to the employee are not to be interpreted in any way that alters the "at-will" relationship. The disciplinary procedures generally guide the action of ProCircular in the unusual event that disciplinary action is needed. ProCircular reserves the right to deviate from any procedure to properly protect its interest, or those of its employees in response to anticipated problems in the workplace.

See Something, Say Something

An employee who feels that they have been harassed by another, or who has witnessed harassment of another, has several options. Whenever possible, the person doing the harassing should be told, firmly, that such conduct is not acceptable. Alternatively, in any case, the complaint of harassment may be brought to management, Human Resources, or a member of the Leadership Team. Under no circumstances will any person who in good faith makes a complaint, or assists in its investigation, be subject to any form of retribution or retaliation. Any person who makes or participates in such retribution or retaliation directly or indirectly, will be terminated.

All complaints of harassment will be promptly and thoroughly investigated; if the complaint is found to be justified, corrective action appropriate to the circumstances will be taken. All complaints and all information given during an investigation will be treated as confidentially as possible, subject to the need to conduct a full and fair investigation, and to inform those individuals who will be involved in any action.

Anti-Harassment Policy

Civility and respect for everyone's privacy and dignity are required of all employees of ProCircular. Any conduct which is inconsistent with these principles is simply not acceptable. More specifically, any form of harassment on the job or related to the job, including sexual harassment, and including racial, ethnic, disability, or other harassment, is absolutely prohibited and will result in disciplinary action including and up to termination.

Harassment is broadly defined to include any conduct which is generally demeaning or offensive and tends to equate a person's worth to their gender, race, religion, age, disability status, or other personal traits. Harassments unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment (quid pro quo), (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or (3) 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.

What is or is not offensive must be viewed from the perspective of the victim, and the fact that no objection is voiced, or the other person seems to be "going along" does not mean the conduct is acceptable. Nobody, including directors, officers, managers, or customers, is authorized to engage in harassment or discrimination of any kind.

Anti-Discrimination Policy

Harassment based on any other improper factor, such as race, color, religion, age, national origin, or disability is considered discrimination and is strictly forbidden. As with harassment, any conduct which could be offensive and create an intimidating, hostile, or offensive working environment based on one of these factors, is improper and is strictly prohibited. This could include, for example, racial jokes or slurs, religious jokes or slurs, or the assignment of work known to be beyond an individual's disability limitations with the intent to harass or annoy.

Background Checks

To ensure that individuals who join ProCircular are well qualified and to ensure that ProCircular maintains a safe and productive work environment, it is our policy to conduct pre-employment background checks on all applicants who accept an offer of employment. All offers of employment are contingent upon the receipt of a background check report that is acceptable to ProCircular. Only instances that directly correlate with the essential job functions of a position will be taken into consideration. Those with a guilty/convicted verdict within the past 7 years will not be eligible for hire. Reports are kept confidential in nature.

Additional checks such as a driving record report may be made on applicants for particular job categories if appropriate and job related. ProCircular conducts background checks on currently employed employees semi-annually in order to comply with client contracts.

Equal Employment Opportunity

ProCircular recognizes the importance and value of diversity in the workplace and in the communities in which we operate. The Company is committed to ensuring equal opportunity (EEO) for all persons regardless of race, color, religion, sex, age, marital status, national origin, citizenship status, disability, veteran status, or any other protected classes. Equity is defined as the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities, such as Black, Latino, Indigenous and Native American persons, Asian Americans and Pacific Islanders, and other persons of color; people identifying as lesbian, gay, bisexual, transgender and queer (LGBTQ); people with disabilities; religious minorities; persons who live in rural areas; and persons otherwise affected by persistent poverty or inequality.

Equal opportunity extends to all aspects of the employment relationship, including recruitment, selection, assignment, classification, demotion, transfer, promotion, training, terminations, layoffs, working conditions, compensation, benefits, and other terms and conditions of employment. Along with our commitment to provide equal employment opportunities, the Company will realistically consider any qualified applicant for actual employment, whether accommodations are necessary.

Employment practices shall not be influenced by race, religion, creed, color, sex, age, national origin, sexual orientation, physical handicap, or any other aspects protected by law. The Company will take every measure to ensure the implementation and continuation of this policy and will investigate any complaints or suspected infractions.

Substance Abuse Policy

Employees are prohibited from the unlawful manufacture, distribution, dispensation, possession, or use of a controlled substance on ProCircular premises. Also prohibited is the use or possession of any illegal drugs on ProCircular premises, while on the job, or while performing ProCircular business, or appearing for work or performing any job duties while intoxicated or impaired by alcohol, illegal drugs, or improper use of prescription or over-the-counter medicines. Employees whose performance may be impaired by proper use of prescription or over-the-counter drugs must so advise their supervisors and may be sent home if deemed unsafe. Employees who violate these rules are subject to corrective action including a drug test or even discharge.

At times, alcohol may be available at the workplace or during work-related functions. Employees should refrain from abusing alcohol at all costs. Under no circumstances should an employee consume alcohol and then appear on client site or bring alcoholic beverages/controlled substances on site.

ProCircular recognizes that drug dependency and alcoholism are health problems and will attempt to work with and assist an employee who becomes dependent on drugs or alcohol. Employees will be assisted upon request in identifying rehabilitation services, referral agencies, or other resources to help the employee in dealing with their problem. It is the employee's responsibility, however, to see that such problems do not interfere with proper job performance or expose others to the risk of harm. All employees are urged to obtain any necessary help before a personal problem becomes an employment problem. No employee will be retaliated against for voluntarily seeking help for this or any other type of personal problem.



Job Descriptions

There will be a job description for each position at ProCircular. These can be considered mini handbooks as they help clarify expectations, qualifications, schedules, and other important aspects of each position.

Predictive Index

ProCircular utilizes the Predictive Index (PI) Management System. PI is an objective, data-based assessment used to maximize individual and group production by improving communication and understanding among teams. With this tool we can develop realistic and objective job analyses and the descriptions of behaviors needed for specific roles, and give managers specific, relevant knowledge of the behavior of the people on their team which enables them to better motivate and understand those individuals. By understanding your strengths and weaknesses we hope to provide opportunities to capitalize and enhance those natural abilities.

Introductory Period

Quality over Speed, Speed over Cost! If you're new to the company or a position, we will have a dedicated trainer designated for questions and on-the-job training for the first 6 months. During this period, employees will accustom themselves to their new position, job duties, and coworkers. An employee may be reviewed, either formally or informally, up to once a month. If you have any questions about the role or what success looks like, now is the time to ask.

Mentor Program

ProCircular supports new employees during the onboarding period by partnering them with a buddy. Buddies will be selected by Human Resources. The buddy will offer the new employee a connection to someone outside of their own department who can provide guidance but is not in a position of direct authority or acting in an official capacity. The buddy may be responsible for such mundane tasks as giving directions to the restrooms or breakroom or instructions on parking guidelines, or he or she may be involved in helping the employee understand the nuances of working in the organization. Buddies will meet with the new hire once a month for the first 3 months of employment. Feel free to tell your buddy what you need to be successful in your role and ask any questions you may have.

Other Trainings

Constant development is important to us. Each department is given a training budget for the year to allocate resources to the benefit of growing teammates. Should any full-time individual desire to attend a training, class, symposium, or any other form of continued education, reach out to your direct supervisor and make a request.

Open Door Policy

Effective communication between management, the team, and all employees is important and serves a vital purpose in providing a good work atmosphere. Your supervisor is always your best source of information. We also encourage communication from you, the employee. If you have any questions, suggestions, or criticisms, feel free to discuss them with management. If you have made the previously mentioned efforts to resolve a concern and still feel it is unresolved, or the nature of the concern is such that you do not want to disclose it, you should promptly contact Human Resources.

Performance Reviews

Feedback is constant and is designed to grow and develop each teammate. ProCircular normally conducts a formal review for each employee annually. A review may also be conducted in the event of a promotion or change in duties and responsibilities. These reviews will focus on the ProCircular values and Essential Job Functions from each position. Your supervisor is interested in helping you to progress and grow in order to achieve personal as well as work-related goals, and perhaps they can recommend further training or additional opportunities for you. Employees would be wise to use this time to reflect on their own performance and goals, and to discuss these with their supervisor.

Use of Company Owned Equipment

Use of non ProCircular equipment is not allowed unless you have written approval from the Executive Leadership of your division. The use of ProCircular's computers, networks, fax machines, electronic mail, and all forms of Internet/Intranet access (collectively referred to as "automation systems") and other equipment is for Company business and is to be used for authorized purposes only. Let's not use Company property to:

- Engage in private or personal business activities;
- Misrepresent oneself or ProCircular;
- Solicit or sell products, distract coworkers, or disrupt the workplace;
- Engage in unlawful or malicious activities;
- Use abusive, profane, threatening, racist, sexist, or otherwise objectionable language in either public or private messages;
- Send, receive, or accessing pornographic materials;
- Cause congestion, disruption, disablement, alteration, or impairment of Company networks or systems; and/or
- Defeat or attempt to defeat security restrictions on Company systems and applications beyond authorization.

Using ProCircular's automation systems to create, view, transmit, or receive racist, sexist, threatening, or otherwise. ProCircular's automation systems must not be used to violate the laws and regulations of the United State or any other nation or any state, city, providence, or other local jurisdiction in any way. All equipment remains the property of ProCircular, as does the work product, record, data, messages, and/or communications generated through use of Company-owned equipment. Such equipment includes, but is not limited to, all phone systems, mail systems, computer systems, and all other physical equipment supplied for employee use by ProCircular. Company employees should make every effort to protect such equipment and ensure that it is used only for ProCircular business. All photographs, headshots, recordings, presentations, or other work-related records will also remain the property of ProCircular.

Cameras on please

Our team is operating with employees in nine states and customers all over the country. Most of our interactions are over Teams meetings. We're only just learning the advantages and disadvantages of that approach as a society. Still, it's safe to assume that video conferencing makes it harder to establish long-standing relationships.

If you're on a meeting with a client, cameras should always be on. Our business is built on trust, and that trust is underlined when you can see the person on the other end of a call.

If you're on an internal call, cameras should default to on. We all have jumped on calls with chaos happening around us at home, and not everyone needs to see it first-hand. That said, at least do others on the call the courtesy of starting with your video on. It helps to build trust and respect in the same way and acknowledges to the person on the other end that you value their time.



Exempt

Exempt employees have defined responsibilities that qualify for compensation that is exempt from overtime pay or paid on an annual salary. These employees are required to work at least 40 hours and qualify for all Company-sponsored benefits.

Non-exempt

These employees are entitled to overtime pay, calculated at time and a half, for any hour worked more than forty hours (40) per week. Non-exempt employees may be part-time or full-time and are paid with at an hourly rate.

Full-Time

An employee who is regularly scheduled to work a minimum of 40 hours per week is considered a regular full-time employee, and can be designated as exempt or non-exempt. These employees are eligible for all ProCircular sponsored benefits.

Part-time

An employee who is regularly scheduled to work 29 hours a week or less is considered a part-time employee. Part-time employees are not eligible for any ProCircular-sponsored benefits, unless specifically noted, and will be paid hourly.

Intern

An employee who is regularly scheduled to work 20 hours per week or less. Interns are hired for a period of 90 days to gain experience and skills. Interns are not eligible for any ProCircular-sponsored benefits, unless specifically noted, and will be paid hourly. Upon the completion of 90 days of employment, the hiring manager will determine whether to continue the internship for another 90 days, hire the employee as part-time, full-time, seasonal or end the internship. The decision to continue the internship will be based on business needs, skills, and performance.

In and Out of the Office



Hours of Work

Office hours at ProCircular are from 8:00 AM to 5:00 PM; however, ProCircular allows employees to set their schedule with their direct supervisor and potentially flex some time pending pre-approval. Unfortunately, there may be times employees are required to work some weekends, holidays, and strange shifts for services such as incident response.

Attendance

Tomorrow Just Happened! Let's take a moment to appreciate how each employee's reliability is essential to the successful operation of ProCircular. Employees are required to be on time to start their day and for all appointments. If there is an emergency and you cannot be somewhere as planned, communicate with your supervisor as soon as you become aware, but no less than one hour before the appointment. All of us should report from breaks and lunch at the proper time and not end their working shift or day early without expressed permission from one's supervisor. To change your regular work hours, flex your time, take a long lunch, or reschedule an appointment, work with your direct supervisor in writing. We will work with you if you communicate with us.

Time off requests must be filled out for any absences or tardiness from work. If poor attendance becomes a pattern, or if flexibility is abused, disciplinary action will be taken to correct the behavior. Any employee who is absent without notifying ProCircular is considered to have voluntarily resigned without notice as of the close of the business day on the third consecutive no call/no show day.

Pay for Fun

It's About the People! We want you to get paid for the fun part of your life too as a part of our full-time compensation package. All PTO should be requested and pre-approved by your direct supervisor.

Service	Allotment
0-3 Years	15 days
3-5 Years	20 days
5-10Years	25 days
10+ Years	30 days

Some guidelines:

- First thing's first. This is a benefit for you, so we all have healthy work/life balances. If it's in your balance, use it! Do something fun and return to work refreshed!
- Exempt, salary employees should not have the option of unpaid time off unless it is otherwise approved by upper management.
 - Part-time hourly employees do not accrue PTO and therefore can request unpaid time off.
- PTO time is not a vested benefit and cannot be used until it is accrued.
- PTO must be approved by your supervisor and is not guaranteed. It is more likely to be approved if you give more notice. Please request your time in advance.
- PTO is at the equivalent rate of pay for hours an employee would be regularly scheduled.
- If you're not working on something, or monitoring your email, you should request PTO unless it falls into a different leave category (bereavement, jury duty, etc.) or your supervisor has approved flex time.
- Any unused PTO will roll over into the next year (after your anniversary), but all PTO balances will be capped at 240 hours.
- PTO can be back-to-back with holidays if pre-approved; however, for unplanned absences the day before or after a holiday, PTO will be used in lieu of holiday pay.
- PTO shouldn't be used for more than two consecutive weeks, unless otherwise approved or is being used within the Sabbatical Option parameters (see below).
- PTO may be requested in 1-hour increments.

Out of Office Procedure:

1. Request via Bamboo
2. Please communicate your absence to your immediate team, and more importantly, the PMO group. PMOs can be notified using the PMO@procircular.com email address.
3. Update your calendars with banner holds that indicate your "Out of Office" status.
4. Set up your away message in Outlook. It's also nice to provide an alternate contact at the company to address time-sensitive matters.

Kindness Budget

At ProCircular we strive to be kind and want to make a difference! Each manager has a kindness budget that is designed to motivate and retain valued employees. This budget can go towards recognizing good performers, helping teammates in a time of need or a random act of kindness to show you we appreciate you as a teammate. The use of this budget is at the discretion of each member of management who is responsible for the teammate's success. Typically, these gifts are smaller (less than \$250) and look to aid the employee, their spouse, or their family in their outside life. This budget is at the discretion of each department head, for questions contact the Controller or your direct supervisor.

Sabbatical Option

To reward those that are with ProCircular long-term, on your third anniversary and every three years after, we will remove the restriction of limiting the amount of PTO that may be used consecutively. In other words, before you are here three years, you may not use more than two weeks of PTO in a row, but after the third year, you can choose to pair all 20 days together and enjoy a sabbatical. In your sixth year, you can pair all 25 days together! This pattern will continue every three years. If you've stuck around, and you've earned it!

Holiday Pay

All full-time employees will receive holiday pay on the day of the holiday, or on the closest Friday if the holiday is on a Saturday, or the closest Monday if the holiday is on a Sunday.

- New Year's Day
- Martin Luther King Day
- Good Friday
- Star Wars Day
- Memorial Day
- Independence Day
- Labor Day
- Veterans Day
- Halloween Day
- Thanksgiving Day
- Day after Thanksgiving
- Christmas Holiday (between Christmas Eve and New Year's Day)
- Employee's Birthday (employee must use during the week of the employee's birthday).

Jury Duty

Employees will be granted time off to the extent necessary to serve mandatory jury duty. Compensation will be the difference between normal wages for regularly scheduled hours, and the amount of jury duty pay which the employee receives. Employees must provide reasonable notice of their absences when called for jury, and documentation of pay received for such service. If released from duty during regular working hours, the employee must return to work.

Bereavement Leave

In the event of a death of an immediate or extended family member, employees will be allowed up to three (3) normally scheduled consecutive working days off immediately following the death to arrange for and/or attend the funeral. Full time employees will be paid for this leave, part-time and student-interns will be able to take this time unpaid. Additional days beyond three may be used from earned vacation time with the approval of the employee's Supervisor. Any Bereavement Leave absence must be requested in Bamboo.

Immediate Family	current spouse, mother, father, sister, brother, child, and step and in-law equivalents	3 days (24 working hours) of Bereavement
Extended Family	aunts, uncles, cousins, grandparents, and step and in-law equivalents	1 day (8 working hours) of Bereavement

Voting Leave

The Company encourages all employees to vote. Most polling facilities for elections for public office are scheduled to accommodate working voters. ProCircular, therefore, requests that employees schedule their voting for before or after their work shift. An employee who expects a conflict, however, should notify their supervisor, in advance, so that schedules can be adjusted if necessary and appropriate.

Military Leave

A military leave of absence will be granted to employees to attend scheduled drills, training, or if called to active duty with the U.S. Armed Services. In such circumstances, the employee will be required to provide deployment documentation as soon as the employee is notified, but no later than 24 hours from their last working day.

Employees on two-week active-duty training assignments or inactive duty training drills are required to communicate with their employer about continued employment after the end of training, allowing reasonable travel time. Employees on longer military leave must apply for reinstatement in accordance with all applicable state and federal laws, but no later than 90 days after the release of duty. Every effort will be made to return eligible employees to their previous position or a comparable one. They will be treated as though they were continuously employed for the purposes of determining benefits and tenure.

This leave will be unpaid, however; employees may use any available PTO for the absence. ProCircular will reasonably provide health insurance benefits while deployed; however, employees on Military Leave will still be responsible for the employee-portion of the insurance premiums.

Maternity and Paternity Leave

Congratulations! If you are adding a new member for your family, we understand you may want time to get into your new normal. New parents may take up to 10 weeks off for maternity and/or paternity leave. This benefit will be unpaid unless Vacation Time is used.

Please notify your supervisor or Human Resources of a pregnancy when you are comfortable doing so, but no later than 5-months before the anticipated delivery date. Prior to returning to work, a work release from your physician must be provided to ProCircular following a physical delivery. ProCircular will retain your seniority and benefit status and return you to your original job, or an equivalent job in duties and pay upon your return. You will be responsible for your health insurance premiums while on leave.

Leave of Absence

In extreme circumstances, ProCircular may draft a Leave of Absence (LOA) agreement in which an employee may take care of personal or medical duties for extended absences, unpaid. During the agreed upon timeframe, ProCircular will do their due diligence to hold an employee's position, or a position similar in pay and status, for when the LOA is complete. The employee is responsible to arrange for their benefit contributions to be paid to ProCircular beforehand.

Incident Response

When a crisis happens, we need all hands-on deck. Those teammates who volunteer to handle an incident outside their regular scope of work, without compromising the quality of their other responsibilities, are eligible for a bonus equal to 5% of the billable income associated with the incident. Management will have discretion on the eligibility of said bonus based on overall performance. When necessary, management will approve suggestions and ideas involving delegating, flexing, and getting creative with any current responsibilities.

Snow and Ice Days

When traveling to work, be safe and careful. If snow or ice is delaying, closing, or dismissing your relevant school districts, working from home is an option. Work with your supervisor or manager to work out the details and any scheduling conflicts. If someone is working from home, they must be working, available, and logged on. If not, feel free to request PTO for the day. The purpose of this policy is to keep everyone safe. If you must stay home on a cold day or other school closings, please request PTO, or communicate with your supervisor.

You are generally expected to report to work unless major thoroughfares have been closed due to extreme weather. Quite often, bad weather conditions are localized and, simply by waiting, you may be able to safely arrive at work later in your shift. Under these circumstances, properly report your tardiness or absence to your supervisor and indicate your expected time of arrival. While ProCircular does not expect employees to place themselves at unnecessary risk, each employee is expected to make a sincere effort to come to work as scheduled or use PTO for any missed time.



The No-No List

All employees are expected to conduct themselves in a professional manner, use common sense, and always comply with ProCircular's policies. Following are some specific examples of conduct which will not be permitted. Naturally, this list cannot be all-inclusive.

- Disrespectful or inappropriate behavior toward a fellow employee, partner, or client;
- Improper or unreported absences or tardiness, requests to leave early where appropriate documentation is not provided, patterned attendance (e.g. absent Mondays, leaving early on Fridays, etc.), absences designed to avoid specific job assignments, unapproved extensions of vacations or holidays, unapproved absences, or the failure to provide the appropriate documentation when requested to excuse an absence;
- Poor performance, misconduct, or other forms of unacceptable behavior can occur in connection with unreliable attendance;
- Physical or verbal abuse of any coworker or other person;
- Theft, destruction, or unauthorized removal of any property of ProCircular, a fellow employee, a customer or any other party;
- Dishonesty of any kind, or falsification of any of ProCircular's records, documents, including time sheets or personnel information;
- Fighting or attempting bodily injury or using profane, abusive, or threatening language; Fighting, engaging in horseplay, or intentionally causing mental or physical harm to another;
- Reckless, disorderly, or immoral conduct, including malicious or idle gossip;

- Breach of confidentiality;
- Disobedience, failure, or refusal to carry out any reasonable assignment;
- Repeated absence or tardiness, or failure to call in prior to an absence or tardiness;
- Deliberate loafing of any kind, disturbing other employees during working hours, or sleeping on the job;
- Unlawfully distributing, selling, possessing, using, or being under the influence of a controlled substance, legal or illegal;
- Publicly denouncing/endorsing a political subject, candidate, or topic on behalf of the Company without approval;
- Using the Company phone or a personal phone excessively and/or while not on break for purposes that are not work-related;
- Harassment or discrimination of an employee, partner, intern, or client;
- Failure to report an incident or accident on work property;
- Any offensive, abusive, insensitive, or ill-intended behavior;
- Having an unauthorized weapon, of any kind, on client site, including firearms;
- Misuse of company property for personal gain or abusing said property; and
- Failure to comply with any other ProCircular policy, rule or procedure.

Compliance

ProCircular and its employees and representatives will comply with all federal, state, local and foreign laws, and regulations applicable to its business operations and shall maintain its business records in an accurate manner. This obligation includes, without limitation, the following:

- ProCircular will conduct all operations in compliance with all applicable environmental laws and regulations. This includes compliance with permitting and reporting requirements under all applicable state and federal laws and regulations;
- ProCircular will comply with the antitrust and competition laws applicable to ProCircular's business operations;
- ProCircular will comply with all U.S. laws applicable to foreign sales and/or potential foreign operations, as well as the laws and regulations of the countries in which such sales and/or operations occur

Conflicts of Interest

ProCircular employees are expected to devote their full business time and energy to performance of their duties for ProCircular and should avoid any situation or activity that either conflicts with or creates the appearance of a conflict with the employee's responsibilities or is otherwise at odds with the legitimate business interests of ProCircular. Business decisions must be made objectively, with ProCircular's best interests in mind, and without placing personal gain ahead of the business. Prohibited conduct includes, but is not limited to engaging directly or indirectly in:

- Any outside business activity that competes with ProCircular's current business;
- Any outside business activity that represents a logical extension of ProCircular's current business or a business opportunity that ProCircular would potentially pursue and within any potential line of business for ProCircular;
- Any situation which may compromise one's judgment or cause one to show favoritism to a competitor, supplier, customer, or others;
- Any time-consuming activity that detracts from one's ability to devote their full business time and energy to ProCircular's business; and

- Any activity that may improperly influence one's business judgment

In addition to activities that are strictly prohibited as a conflict of interest, other situations may arise that will require disclosure and guidance from ProCircular before one can engage in that activity. For instance, you must disclose any financial interest that you or any family member has in any firm that either does business with ProCircular or potentially competes with ProCircular.

Full-time employees of ProCircular are discouraged from holding outside employment. All employees who hold jobs or other engagements outside ProCircular must notify their supervisor and may not receive approval for the outside position if it is deemed to create a conflict of interest with ProCircular, to be inconsistent with the philosophy or reputation of ProCircular, or if the employee's job performance/attendance may be compromised. Certain outside consulting or speaking engagements may be approved for the employee on paid work time, if deemed by the President/CEO to be in the best interest of ProCircular.

Safe Work Environment

ProCircular strives to provide a safe working environment. At all times, every employee is responsible and accountable for following policies and procedures that promote a safe and healthy work environment. It is also the responsibility of each employee to comply with all federal, state, and local health and safety laws and regulations applicable to the ProCircular's business, including all OSHA regulations. Any employee with knowledge of any unsafe condition must bring such information to the attention of their supervisor or other appropriate management representative for resolution.

Corrective Behavior

Every place of business must have certain rules of conduct to guide its employees and to maintain proper levels of professionalism, harmony, and productivity. When the rules are not followed, action will be taken in the best interest of the entire organization. Employees are always expected to comply with the rules of conduct and play nice. Whenever an employee fails to do so, corrective action will be imposed. Corrective action may include the following steps, in any order; coaching, verbal warning(s), written warning(s), probation, suspension, and/or termination.



Actions speak louder than words!

Dress to Impress

Let's take pride in our appearance and represent the Company well. Here are some guidelines:

- When in our office, a neat, tasteful appearance contributes to the positive impression you make on our customers, co-workers, and visitors. You are expected to be suitably attired and groomed during working hours or when representing ProCircular. When clients are onsite, ProCircular attire, clean jeans, tennis shoes, open-toed shoes, shorts, dresses, and or/polos may be worn.
- When visiting a client, ProCircular employees generally meet in the banking/financial, technology/education, or industrial worlds. Please be mindful of the environment you will be visiting and dress accordingly. ProCircular encourages long-pants, dresses, skirts, polos, oxford shirts, and close-toed shoes. Open-toed shoes, shorts, t-shirts, ripped jeans, clothing that reveals undergarments, etc. may not be worn on client-facing workdays.

Ownership/Access of Automation Systems

ProCircular has the right to inspect and monitor all data and files in ProCircular's automation systems, including the right to inspect and monitor computer and e-mail usage, both as it occurs and in the form of account histories and their content. ProCircular will comply with reasonable requests from law enforcement and regulatory agencies for logs, diaries, archives, or files on individual computer and e-mail activities.

Unauthorized Duplication of Software

ProCircular prohibits the illegal duplication of software. The copyright law is clear. The copyright holder is given certain exclusive rights, including the right to make and distribute copies. Title 17 of the U.S. Code states that “it is illegal to make or distribute copies of copyrighted material without authorization”. The only exception is the users’ right to make a backup copy for archival purposes.

The law protects the exclusive rights of the copyright holder and does not give users the right to copy software unless the manufacturer does not provide a backup copy. Unauthorized duplication of software is a Federal crime. Penalties include fines of as much as \$250,000, and jail terms of up to five years. Even the users of unlawful copies suffer from their own illegal actions. They receive no documentation, no customer support, and no information about product updates.

- ProCircular licenses the use of computer software from a variety of outside companies. ProCircular does not own this software or its related documentation, and unless authorized by the software manufacturer, does not have the right to reproduce it.
- With use on local area networks or on multiple machines, Company employees shall use the software only in accordance with the license agreement.
- Company employees learning of any misuse of software or related documentation within ProCircular shall notify the department manager/supervisor.
- Company employees who make, acquire, or use unauthorized copies of computer software shall be disciplined as appropriate under the circumstances.

Confidentiality of E-Mail

Electronic mail is always subject to inspection and monitoring, and the release of specific information is subject to applicable state and federal laws and Company rules, policies, and procedures on confidentiality. Existing rules, policies, and procedures governing the sharing of confidential information also apply to the sharing of information via commercial software. Since there is the possibility that any message could be shared with or without your permission or knowledge, the best rule to follow in the use of electronic mail for non-work-related information is to decide if you would post the information on the office bulletin board with your signature.

Email Retention

The following guidelines pertaining to Email Retention is intended to assist employees in determining which category of emails should be retained and the duration of the retention. The policy is designed to ensure compliance with federal and state laws and regulations, to eliminate accidental or innocent destruction of emails and to facilitate ProCircular's operations by promoting efficiency and freeing up valuable storage space.

The information covered in these guidelines includes, but is not limited to, information that is either stored or shared via email technologies.

All ProCircular email is categorized into three main classifications with retention guidelines:

Category	Definition	Retention Period
Administrative Correspondence	Administrative correspondence includes, though it is not limited to, clarification of established company policy, including holidays, time card information, dress code, work place behavior and any legal issues such as intellectual property violations	1 year
Fiscal Correspondence	All information related to revenue and expense for the company and budgetary data	1 year
General Correspondence	All information that relates to customer interaction and the operational decisions of the business	1 year

Email and Phone Tone

Users are expected to communicate with courtesy and restraint with both internal and external recipients. Electronic mail should reflect the professionalism of ProCircular and should not include language that could be construed as profane, discriminatory, obscene, sexually harassing, threatening, or retaliatory. It is recommended that using all capital letters, shorthand, idioms, unfamiliar acronyms, and slang be avoided when using electronic mail. The types of messages are difficult to read. Generally, ProCircular employees should be responding to emails and requests within 8 business hours.

Email Tampering

Unless authorized by Company, electronic mail messages received should not be altered without the sender's permission; nor should electronic mail be altered and forwarded to another user and/or unauthorized attachments be placed on another's electronic mail message.

Inappropriate Use of the Internet/Intranet

Unless authorized by Company, no employee may use ProCircular's Internet/Intranet facilities to deliberately propagate any virus, worm, Trojan horse, trap-door program code, or other code or file designed to disrupt, disable, impair, or otherwise harm either ProCircular's networks or systems or those of any other individual or entity.

ProCircular's Internet/Intranet facilities and computing resources must not be used to violate the laws and regulations of the United States or any other nation or any state, city, province, or other local jurisdiction in any way. Use of ProCircular's resources for illegal activity can lead to disciplinary action, up to and including dismissal and criminal prosecution.

Internet/Intranet and Confidential Information

Existing rules, policies, and procedures governing the sharing of work-related or other confidential information also apply to the sharing of information via the Internet/Intranet. Please refer to the policies elsewhere in this Handbook regarding the release of confidential information. ProCircular has taken the necessary actions to assure the safety and security of our network. Any employee who attempts to disable, defeat, or circumvent ProCircular's security measures is subject to disciplinary action, up to and including dismissal.

Social Media & Blogging

For all rules and standards for social media and blogging, please see professionalism and communication standards set forth in this Handbook. Social Media and Blogging are merely different platforms to interact with the public and our customers. All the principles and standards of conduct shall equally apply to electronic communication and interaction just as it does in person interaction and communication.



Health Insurance

ProCircular offers health, dental, and vision insurance for all full-time employees. These benefits are to begin the first of the month following their first day of full-time employment. The Company offers a generous contribution to health and dental and covers the cost of the employee's vision insurance. For family coverage, the employee will assume the cost of vision.

Life Insurance

ProCircular provides 100% company-sponsored life insurance for all full-time employees. These benefits are to begin the first of the month following their first day of full-time employment. Eligible employees may elect additional life insurance and accidental death and dismemberment insurance for an additional fee. For more information on life insurance, see Human Resources.

401K

ProCircular offers a vesting match program for this retirement plan for all full-time employees. These benefits are to begin the first of the month following their first day of full-time employment.

Health Savings Account (HSA)

ProCircular offers all full-time employees the option of a health savings account that allows qualified medical expenses to be tax-free. Additionally, ProCircular gives each enrolled employee a one-time contribution of \$250 to begin the account! These benefits are to begin the first of the month following their first day of full-time employment.

Educational Reimbursements

From time to time, ProCircular may request that you attend training or educational activities which may be on or off ProCircular premises. If you are specifically requested by your supervisor to attend, the cost of such classes will be either paid for directly by ProCircular or reimbursed to you.

Phone a Friend

ProCircular recognizes and encourages teammates to refer qualified candidates that can enhance the team with their attitude and skills. Employees who “phone a friend” and make a successful referral, defined as employment for the duration of one complete year, will earn a referral bonus. HR or the hiring manager must know about the referral before the candidate starts to be eligible for this bonus. The referral bonus is \$1000 for current employees when the new full time employee starts and another \$1000 on their 1-year anniversary. Either send them the link to the website, use the links provided from Bamboo for specific jobs, or send HR their name and contact information and someone will reach out to start the conversation! Just make sure we know who you've referred!

Professional Dues

All full-time employees are eligible for one membership each in a professional organization, with dues paid for by ProCircular. To make a request, speak with your direct supervisor. The President will make any approvals for said professional dues unless the requested organization is deemed to be inappropriate or an unnecessary duplication of another employee's membership.

Community Impact

ProCircular supports local non-profit organizations and encourages volunteering in the community (preferably with your PC tee on). As an employee benefit, 16 hours (or 2 days) of paid Volunteering time is available for all full-time employees. For those working outside the state of Iowa, all volunteering opportunities for an accredited non-profit qualify. Thank you for all you do to serve our community!

ProCircular Swag

ProCircular just loves when you represent yourself, your team, and the Company well by wearing ProCircular swag in conference calls and on client site. With any purchase of said swag, ProCircular will pay 50% of the cost! Another benefit, the swag is completely customizable! If you prefer orange instead of our logo colors, go for it! We will add the logo.



Payroll and Reimbursement

- To keep personnel, payroll, and benefit records current, employees should notify Human Resources immediately whenever there is a change in their name, marital status, dependents, address, telephone number, tax withholding status, or insurance.
- For timekeeping and payroll purposes, the normal scheduled workweek begins on a Saturday and ends on Friday. All full-time and part-time employees will be paid bimonthly. Unless authorized otherwise, it is the policy of ProCircular to utilize direct deposit for net pay on all paychecks. Full-time employees should work at least 40 hours a week. ProCircular is open for business from 8:00 AM to 5:00 PM, Monday through Friday.
- Non-exempt employees and those who bill clients for their time must record all time worked, including time worked over their normal schedule. Time is rounded to the nearest quarter of an hour. Any hours to be worked more than an employee's normally scheduled work week must be approved in advance by the employee's supervisor.
- Non-exempt employees and those who bill clients for their time must accurately complete electronic timecards. Falsifying timecards or preparing timecards for another employee is prohibited and may result in discharge. Supervisors will audit and sign timecards at the end of each pay period.
- Payroll deductions are normally made for federal income tax, social security, state income tax, and court order garnishments (including processing fees). Other deductions could include medical insurance, dental insurance, vision insurance, Simple IRA, and/or employee charges (including voluntary AFLAC coverage).

Reimbursements

Employees must have approval of their supervisor or department head prior to incurring any expense, for the expense to be reimbursable. The following rules shall govern approved and reasonable expenses:

1. Employees will be reimbursed at the current IRS mileage rates for work related travel. ProCircular is not responsible for any damage sustained to an employee's vehicle. Mileage is reimbursed weekly at the end of each week through Expensify.
2. Expenses incurred in connection with a seminar, conference or other meeting, employees will be given a per diem allotment for each overnight stay in accordance with the IRS guidelines. Reimbursement will also occur at the end of each week through Expensify.
3. Other expenses incurred for or on behalf of ProCircular should be submitted for approval in advance.
4. All employees whether using a company credit card or using their own personal funds must submit receipts to the Controller within 3 business days of returning from travel

Overnight Travel

If you are required to travel on ProCircular business, you must work with the Project Manager to coordinate overnight stays.

Meals

Reasonable travel and meal expenses will be provided by ProCircular for those traveling more than 45 miles from the employee's regular workstation if they are required to travel 6 or more hours in a day. In this instance, the employee will be reimbursed for meals and incidentals up to the maximum amounts outlined below:

Breakfast	\$15	Dinner	\$30
Lunch	\$20	Incidentals	\$10

Incidentals may be used for coffee, snacks, etc. Alcohol will not be reimbursed or purchased for a traveling employee that exceeds one beverage for dinner, per employee.

The maximum amounts also apply to employees who make purchases on their corporate credit card. Employees that make purchases on the corporate credit card that exceed the maximum amounts as outlined above will be required to reimburse the company for the overages via payroll deduction.

Hosting

Any employee hosting a client for breakfast, lunch, dinner, coffee, etc. will be reimbursed. Dinner/lunch expenses for the entire engagement may not exceed \$30 per attendee.

Expense Reports

You will be required to submit an Employee Expense Report via Expensify after all purchases or with your return to the office after traveling. Expense reports and all receipts must be submitted within 3 business days of the conclusion of business-related travel. Reimbursements will be credited to the employee by the end of the week after receiving completed expense reports.

Separation of



Employment

Employment may be terminated either by “resignation” (initiated by the employee) or by “discharge” (initiated by ProCircular). In the case of resignation, employees must provide two (2) weeks’ written notice. If an employee is out of their introductory period, employees leaving ProCircular due to voluntary resignation, retirement, or lay off will be eligible to be paid for their unused but accrued PTO if they provide at least a two (2) week notice and agree to participate in an exit interview. If an employee resigns without notice or due to being placed on probation, they will not be eligible for a PTO payout and will be deemed ineligible for rehire. PTO payout is limited to one week of pay, if 5 days are accumulated in the balance.

If an employee applies again, they are subject to ProCircular’s usual pre-employment procedures. To be considered, an applicant must have been designated eligible for rehire during their initial exit process.

Technology Issues and Dismissal

If possible, ProCircular’s technology department should be notified at least 24 hours in advance of a dismissal, whether voluntary or involuntary. This will give the department time to monitor any computer use that could be out of the ordinary. This time will also be used to secure items that could be sensitive or confidential. An audit may be made of the impact the user will have on the system and the files and data the person is in care of.

Prior to the date the employee leaves, the employee’s system account will be disabled, and the employee will not be able to log in as normally expected. All files and data on the workstation or server will be locked and will not be available to the user. An audit will be made after the employee has left to ensure that all data is intact. As a matter of regular practice and due to the nature of ProCircular’s work, all passwords and security clearances will be changed within 24 hours for any voluntary or involuntary dismissal.

COBRA

If an employee has elected insurance coverage during employment and is actively receiving benefits, a COBRA notice will be provided to the employee upon termination. This notice will provide information about continuing insurance benefits, at full cost, to the terminated employee. Election of COBRA will allow a former employee to continue insurance benefits through the same plan for up to 18 months from the end of employment.



The following policies are state specific and only apply to those employees that live in that state. ProCircular is open to hiring employees in every state. Should your state not be listed, contact Human Resources for questions.

Illinois

Final Paycheck

Illinois considers vacation or other paid time off to be earned wages and therefore must be paid out at termination.

Sexual Harassment Prevention Training

According to the Illinois Human Rights Act (ILHRA), employers must provide annual sexual harassment training to all employees. New employees must complete their initial training within 30 days of hire.

- <https://www2.illinois.gov/dhr/Training/Pages/State-of-Illinois-Sexual-Harassment-Prevention-Training-Model.aspx>

Illinois Blood Donation Leave

Employees may take up to one hour of paid leave to donate blood every 56 days. Employees are eligible upon completion of 6 months of employment.

Victims' Economic Security and Safety Act (VESSA)

Employees who are victims of domestic or sexual violence or who have family or household members who are victims of such violence may take up to twelve (12) weeks of unpaid leave per any twelve (12) month period to seek medical help, legal assistance, counseling, safety planning, and other assistance.

Illinois Voting Leave

If the polls are not open at least two consecutive hours before or after the employee's shift, employees may take up to two hours of paid leave to vote.

Illinois Emergency Response Leave

ProCircular provides unpaid leave to eligible employees who are volunteer emergency workers so that such employees may respond to a call to emergency duty.

Civil Air Patrol Leave

Eligible employees who are members of the Civil Air Patrol will be allowed up to 15 days of unpaid leave annually for the purpose of participating in Civil Air Patrol training or missions.

Florida

Domestic/Sexual Violence Victims' Leave

Employees who are victims of domestic or sexual violence or that have a family or household member who is a victim of domestic violence may take up to three working days of unpaid leave time within a 12-month period. Employees employed with the Company for three or more months are eligible for this leave.

Civil Air Patrol Leave

Eligible employees who are members of the Civil Air Patrol will be allowed up to 15 days of unpaid leave annually for the purpose of participating in Civil Air Patrol training or missions.

Indiana

Court Attendance/witness Leave

An employee required to appear and serve as a juror or witness in any court will be granted leave for the period during which the attendance of the employee at court is required. To obtain approval for leave under this clause, a leave application must be supported by a copy of the notification that the employee has attended the court. Leave is unpaid.

Civil Air Patrol Leave

Employees who are members of the Civil Air Patrol will be eligible for up to 30 days of unpaid leave per calendar year, but no more than five consecutive days at a time, to respond to emergency missions, so long as the leave of absence does not unduly disrupt the Company's business operations.

Volunteer Emergency Responder Leave

ProCircular provides unpaid leave to eligible employees who are volunteer emergency workers so that such employees may respond to a call to emergency duty.

Minnesota

Minnesota Voting Leave

Eligible voters are entitled to be absent from work for the time necessary to appear at the employee's polling place, cast a ballot and return to work on the day of an election, including presidential primary elections. Leave is paid.

Witness and Crime Victim Leave

ProCircular provides unpaid leave to eligible employees who are witness or victim of a crime, or the spouse or family member of a victim of a violent crime, to attend criminal proceedings related to the victim's case if the employee is subpoenaed or requested by the prosecutor to attend court for the purposes of giving testimony.

Domestic Abuse Leave

ProCircular provides reasonable and necessary unpaid leave and other reasonable accommodations to employees who are victims of domestic violence, sexual assault or stalking to attend legal proceedings or obtain other needed relief.

School Activities Leave

Eligible employees may take up to 16 hours of leave in a 12-month period to attend a child's school conferences and school-related activities.

Missouri

Voting Leave

Employees who do not have at least 3 consecutive hours of non-working time on election day when the polls are opened, may take up to 3 hours of paid leave to vote on election day. Leave needs to be requested prior to election day.

Victim and Witness Leave

Employees who are victims of dangerous felonies, domestic assault and other crimes may take unpaid leave from work to: respond to a subpoena to testify in a criminal proceeding; attend a criminal proceeding; or participate in the preparation of a criminal proceeding.

South Carolina

Bone Marrow/Donor Leave

An employee who works an average of 20 hours or more a week and who seeks to undergo a medical procedure to donate bone marrow may be granted bone marrow donor leave with pay. The total amount of paid leave may not exceed 40 hours.

Ohio

Volunteer Emergency Responder Leave

ProCircular provides unpaid leave to eligible employees who are volunteer emergency workers so that such employees may respond to a call to emergency duty.

Texas

Court Witness Leave

Employees will be provided unpaid leave to appear as a witness in a court proceeding or to attend a juvenile court proceeding when required as a parent or guardian.

Voting Leave

Employees who do not have at least 2 consecutive hours of non-working time on election day when the polls are opened, may take up to 2 hours of paid leave to vote on election day. Leave needs to be requested prior to election day.

Wisconsin

Wisconsin Emergency Response Leave

Employees who are volunteer firefighters, emergency medical services practitioners, emergency medical responders, or ambulance drivers may take leave to respond to an emergency.

Civil Air Patrol

ProCircular will provide up to 5 consecutive days and up to 15 days per year of leave to an employee to respond to an emergency as a member of the Civil Air Patrol.

Wisconsin Victim Leave

Wisconsin law provides victims with the rights to:

Attend court proceedings in the case; and

Assistance from officials to ensure their employers will cooperate with the criminal justice process and the juvenile justice process in order to minimize an employee's loss of pay and other benefits resulting from court appearances.

*ProCircular is open to hiring employees in every state. Should your state not be listed, contact Human Resources for questions.

Culture Book

Revision E

Rev	Initiator	Description	Effective Date
A	ProCircular	Initial Document	06.16.2017
B	Human Resources	Document Revision	07.23.2018
C	Human Resources	Annual Review	01.01.2019
D	Human Resources	Annual Review	08.14.2020
E	Human Resources	Annual Review	1.1.2022

Employee Receipt and Acknowledgement

Revision E

I have received and reviewed a copy of the personnel policies of ProCircular and agree that I will comply with and be bound by these policies. I understand that the policies are not a contract, that ProCircular has the right to interpret and change these policies in its discretion, and that my employment is not under an employment contract or for any guaranteed period but is “at-will,” such that either ProCircular or I can end the employment relationship at any time and for any reason. I also understand that no one could modify at-will employment by any comments or promises. Any deviation in employment at-will must be expressly agreed to in writing by ProCircular.

Name

Signature

Date