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1 PURPOSE

Noblis complies with all applicable federal, state, and local anti-discrimination laws. Noblis is committed to fostering a workplace environment where our employees feel respected, valued, and empowered while upholding the highest standards of ethics and compliance. This *Employment Policy* serves as a guiding framework to ensure fair, respectful, and supportive employment practices and applies to all aspects of employment, including but not limited to hiring, training, promotion, discipline, compensation, benefits, and termination.

2 APPLICABILITY

This policy is applicable to all employees of Noblis and its subsidiaries. Any reference to Noblis herein shall be deemed to apply to Noblis or a Noblis subsidiary, as applicable.

3 POLICY DIRECTIVE

Noblis is committed to fostering an ethical and respectful environment. We expect all employees to adhere to Noblis' workplace standards outlined in the *Noblis Code of Ethics and Conduct Policy* and other relevant policies and procedures. All Noblis employees are prohibited from engaging in unlawful discrimination, harassment, or retaliation of any form. Any employee regardless of title who has been determined to have violated this policy will be subject to disciplinary action, up to and including termination of employment.

3.1 At-Will Employment

Employment with Noblis is at-will. This means that either the employee or Noblis may terminate the employment relationship at any time and for any reason. No employment policy, practice or procedure is intended to create or does create a contractual relationship or guarantee of employment for any period of time. Noblis personnel performing work for clients, either directly or indirectly, or providing services to the Company shall be fully qualified to meet requirements based on appropriate education, training, skills and experience.

3.2 Recruiting and Hiring

3.2.1 Equal Employment Opportunity

Noblis recruits, employs, and promotes qualified individuals based on their capabilities without regard to race (as well as because of or on the basis of traits historically associated with race, including hair texture, hair type, and protective hairstyles such as braids, locks, and twists), color, religion, national origin, sex, age, physical or mental disability, military/veteran status, or other characteristics protected by applicable federal, state, or local law. Noblis is committed to employing persons free of discrimination based solely on

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their education, training, skills and experience, competence, and qualifications to perform the work they are engaged to do.

Noblis uses a wide range of recruitment sources to target a broad spectrum of potential employees. Applicants selected for employment may be subject to a government security investigation and must meet eligibility requirements for access to classified or other regulated information. Certain positions at Noblis may be contingent on a candidate's ability to obtain security or medical clearances, including drug testing or a fitness for duty requiring vaccinations or other medically necessary actions for travel. Candidates will be notified of these requirements as appropriate.

3.2.2 Immigration Status

Noblis is committed to full compliance with federal immigration laws. Each employee (whether a United States (U.S.) citizen or non-citizen) must provide satisfactory evidence of his or her identity and legal authority to work in the United States. This verification must be completed as soon as possible but not to exceed three (3) business days from the first day of employment.

Non-US citizens must be identified through reporting to the Enterprise Technology team and reviewed periodically for appropriate documentation and updates.

3.2.3 Pay Transparency

Noblis adheres to pay transparency standards in accordance with applicable state and local laws governing Noblis' job postings. Some regulations restrict employers from inquiring about an applicant's salary history during the hiring process. Recognizing that wages are personal and sensitive, we emphasize mutual respect in all discussions concerning compensation within the workplace.

3.2.4 Independent Contractor vs Employee

At Noblis, the determination of an individual's status is a collaborative process involving our Procurement and Human Resources teams. This evaluation is conducted thoughtfully, considering the totality-of-the-circumstances analysis outlined by the Department of Labor (DOL) to ensure compliance with employment standards. Accurate classification holds significant importance in ensuring adherence to wage and hour regulations.

3.2.5 Employment of Active or Former Federal Employees

Current and former federal government employees are subject to strict federal conflict of interest laws and regulations that may limit Noblis' ability to recruit and hire certain of those individuals, or may limit the activities that current and former federal employees will be able to perform for the Company if hired. These laws and regulations vary according to the employment status of the federal government employees (whether active or retired),

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the functions they performed, their business relationships with Noblis while they were federal government employees and the time that has elapsed since they left government employment. Severe penalties may be imposed on a former federal government employee and the Company that hires that employee in violation of such laws. Furthermore, Noblis' position with its clients is that even the perception of a conflict could be detrimental to Noblis' business objectives, whether or not specifically prohibited by law. Accordingly, no discussion with a current or former federal government employee regarding employment with Noblis may occur without the involvement of the Senior Vice President, Chief People Officer, and Senior Vice President General Counsel and the Chief Ethics and Compliance Officer.

3.2.6 Employment of Active or Former Federal, State and Local Government Employees and Immediate Family Review

In addition to federal laws, some states have laws regarding the hiring of former or current state or local government employees, or members of their immediate families. Due to the variations in state laws, Noblis' policy is that no employment discussions with former or current federal, state or local government employees or their immediate family members may take place without the approval of the Chief People Officer, General Counsel and the Chief Ethics and Compliance Officer. Employment of close relatives of clients must be reviewed by the Chief People Officer. Such review may also require direct consideration by the contract officer for the program.

3.2.7 Employment of Relatives

Noblis, in its sole discretion, will make all decisions regarding the hiring and placement of individuals who are relatives of Noblis, its subsidiary or affiliate employees. A candidate for employment who has a close relative employed at Noblis may be hired provided one close relative has no direct or indirect management authority over the other close relative. Such situations are not necessarily prohibited, but they call for extra sensitivity to security, confidentiality, and conflicts of interest. Thoughtful consideration should also be given to a candidate or employee's career progression and mobility within the organization and any future conflict. Employment of close relatives of Officers of Noblis is generally not permitted. For the purposes of this provision, the term "close relative" of any person means such person's spouse or domestic partner, parents, brothers, sisters, and the employee's children and step-children.

3.3 Respect in the Workplace

Noblis is committed to providing and maintaining a productive work environment that is characterized by mutual respect and is free from any type of harassment, exploitation, intimidation or discrimination. Noblis is committed to respecting the dignity of every employee and expects every employee to show respect for all Noblis colleagues, applicants,

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clients, visitors, and vendors. Respectful, professional conduct furthers the Noblis mission, promotes productivity, minimizes disputes, and enhances Noblis' reputation.

Accordingly, this policy prohibits harassment or intimidation in the workplace including any unwelcome or unsolicited speech or conduct that is based upon age, race (as well as on the basis of traits historically associated with race, including hair texture, hair type, and protective hairstyles such as braids, locks and twists), color, ancestry, sex (including pregnancy childbirth, lactation and related medical conditions), national origin, disability, or any other protected status of an individual under applicable federal, state, or local law. Not only is harassment against Noblis policy and contrary to the creation and maintenance of a positive working environment, but it is also against the law. Noblis considers harassment or intimidation of any kind to be unacceptable and such conduct will not be tolerated. Management will take appropriate action to address any violations of law or Noblis policies, regardless of the manner in which Noblis becomes aware of the unlawful or inappropriate conduct.

3.3.1 Sexual Harassment

Noblis has zero tolerance for sexual harassment. Sexual harassment is not limited to demands for sexual favors. It is unlawful to harass a person (an applicant or employee) based on that person's sex (including pregnancy, childbirth, lactation breastfeeding, or related medical conditions) regardless of the harasser's sex. Harassment can include "sexual harassment" or unwelcome sexual advances, requests for sexual favors, and other verbal or physical harassment of a sexual nature. Harassment does not have to be of a sexual nature and can include offensive remarks about a person's sex. For example, it is illegal to harass a woman by making offensive comments about women in general.

This policy forbids harassment based on sex regardless of whether the offensive conduct is sexual in nature. Any unwelcome conduct based on sex is also forbidden by this policy regardless of whether the individual engaged in the harassment and the individual being harassed are of the same or are of different sexes. No employee, prospective employee, client, or prospective client should be subjected to unsolicited and unwelcome sexual overtures, nor should any employee or prospective employee be led to believe that an employment opportunity or benefit will in any way depend upon "cooperation" of a sexual nature.

A harasser can be an individual's supervisor, a supervisor in another area, a co-worker, or someone who is not an employee of the employer, such as a client or customer.

Any employee experiencing sexual harassment should directly inform the harasser that the conduct is unwelcome and must stop.

Consensual romantic relationships between Noblis employees is discouraged and prohibited between managers and their direct or indirect reporting employees. While

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romantic relationships between Noblis employees may begin as consensual, they may evolve into situations that lead to charges of sexual harassment, subject to this policy. In determining whether the reported conduct constitutes sexual harassment, consideration shall be given to the record of the conduct as a whole and to the totality of the circumstances, including the context in which the conduct occurred.

3.3.2 Reporting Violations

Noblis is committed to enforcing this policy against all forms of harassment. However, the effectiveness of our efforts depends largely on employees telling us about inappropriate workplace conduct. Noblis requires that employees who have experienced or witnessed any conduct that is inconsistent with this policy, to promptly report such incidents. If an employee believes he or she has been harassed or has witnessed harassment, or has been discriminated against in any way, the employee should inform his or her Manager, the Chief People Officer or General Counsel immediately to report any violation of Noblis policy. If employees do not report harassing conduct, Noblis may not become aware of a possible violation of this policy and may not be able to take appropriate corrective action.

Consistent with this policy against workplace harassment, Noblis maintains posters on its bulletin boards that refer to legal definitions of harassment. These posters identify governmental agencies to contact for information on how and when to file administrative claims. Using Noblis' complaint process does not keep any employee from filing a claim with a state governmental agency or with a federal agency such as the EEOC. Noblis' policy requires immediate notice of problems to the employee's Manager; the Chief People Officer; General Counsel or the Chief Ethics and Compliance Officer. Employees may also notify Noblis using the Compliance Helpline, at 1.888.297.4192 or www.ethicspoint.com. This will allow Noblis to address and resolve any problems promptly and effectively.

All reports describing conduct that is inconsistent with this policy will be investigated promptly. Noblis may put reasonable interim measures in place, such as a leave of absence or a transfer, while the investigation proceeds. Noblis will take further appropriate action once the report has been thoroughly investigated. That action may be a conclusion that a violation occurred, as explained immediately below. Noblis might also conclude, depending on the circumstances, either that no violation of policy occurred or that Noblis cannot conclude whether or not a violation occurred.

If an investigation reveals that a violation of this policy or other inappropriate conduct has occurred, Noblis will take corrective action, including discipline up to and including termination, as is appropriate under the circumstances, regardless of the job positions of the parties involved. If the person who engaged in harassment is not employed by Noblis, Noblis will take whatever corrective action is reasonable and appropriate under the circumstances.

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3.3.3 Anti-Retaliation

Noblis strictly prohibits and does not tolerate unlawful retaliation against any employee, vendor, contractor or other third-party who in good faith reports a violation of this policy or otherwise opposes discrimination or harassment, participates in an investigation of a potential violation of this policy, or otherwise engages in protected activity under the law. All good faith allegations of discrimination and retaliation will be taken seriously and promptly investigated. Appropriate remedial actions will be taken with respect to any substantiated allegations. See Whistleblower and Anti-Retaliation Policy.

3.4 Service Employee Aligned to the McNamara-O’Hara Service Contract (SCA)

Under the McNamara-O’Hara Service Contract Act (SCA), contractors and subcontractors performing services for prime contracts exceeding \$2,500 must ensure that service employees in various classes receive no less than prevailing wage rates and fringe benefits in the respective locality or as specified in predecessor contractor’s agreement. The Department of Labor (DOL) issues wage determinations on a per-contract basis.

To adhere to SCA requirements, our Business Development team is responsible for notifying the Contracts and Human Resources departments if a potential procurement falls under the SCA’s purview. Employees falling within the scope of the SCA undergo review by the Contracts and Human Resources teams to ascertain the appropriate prevailing wage rates and fringe benefits applicable to the contract. Human Resources conducts evaluations to determine wage determinations, ensure compliance with any conformance requirements, and ascertain the appropriate fringe benefits for employees aligned with SCA regulations.

3.5 Outside Employment and Other Activities that Conflict or Compete with the Business of Noblis (not applicable to Employees located in California)

This policy will be implemented in accordance with applicable federal, state, or local laws. Noblis requires its full-time employees to devote their full business time and attention to Noblis and that all employees regardless of status (e.g. full-time, part-time, intern, on-call, etc.) avoid outside business and other activities that create or have the potential of creating a conflict of interest with their work at Noblis. It is Noblis’ policy that all employees regardless of status obtain Officer or Director approval for any outside employment (including self-employment) or other business activities or ownership (each a, “business activity”) prior to engaging or continuing an engagement with such business activity. This approval is obtained by completing Noblis’ *Outside Employment Form*. Mission Area/Shared Services VP/Directors and subsidiary Presidents shall seek the advice and counsel of General Counsel before approving outside employment and business activity requests. Approval will not be granted if the business activity:

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- Makes use of the Proprietary Information of Noblis or its clients (as that term is defined in the Proprietary and Confidential Information, Developments and Non-Solicitation Agreement Form) or risks the unauthorized disclosure or use of such Proprietary Information;
- Competes, either directly or indirectly, with or is potentially competitive of the business of Noblis;
- Creates a conflict of interest with the business of Noblis, or impairs Noblis' reputation or the trust that Noblis' clients place in Noblis;
- Interferes with the employee's ability to perform their job for Noblis or impacts the ability of the employee to perform their job in an impartial and objective manner;
- Makes use of Noblis resources such as information, know-how, time, office space, computing resources or other Noblis personnel; or
- Implies that Noblis is sponsoring, endorsing or otherwise responsible for the business activity.

A copy of a completed *Outside Employment Form* must be provided to the Chief People Officer. Prohibited business activities do not include passive financial ownership interests where the employee does not or cannot exercise any control over the business entity or charitable activities that do not substantially encroach on the time, energy or attention that should be devoted to the employee's work for Noblis.

Approval of a business activity is in Noblis' sole discretion. Noblis may deny approval of any outside business activity if Noblis believes that such business activity would involve or give the appearance of a conflict of interest. Failure to abide by the Noblis policy regarding outside employment and business activities could result in discipline up to and including termination of employment.

3.6 Professional Societies/Journals and Honoraria

Noblis encourages all employees to author, publish and or present technical papers that enhance both the professional development of the employee and the recognition of Noblis. The development and issuance of technical papers and presentations represents a shared commitment between the employee and Noblis whenever a paper is developed or a presentation is given. Publications and presentations by employees must be conducted in accordance with the *Public Release of Information Policy* and the *Public Release of Information Procedure*.

Noblis also encourages all employees to be active in professional societies and to contribute to professional journals. If employees are offered honoraria from an organization to which they belong as a consequence of their work at Noblis, the employee must make the honoraria available to Noblis to accept or reject. Honoraria offered to employees for publications, presentations or other services unrelated to their work at

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Noblis may be accepted by the employee consistent with Noblis' conflict of interest policies. Reimbursement of expenses related to publications and presentations must be paid to Noblis if Noblis paid the expense on behalf of the employee. If the employee participated at the employee's expense, the employee may retain the reimbursement. Refer to the *Honorarium Work Instruction*, in the QMS, for more information.

3.7 Safe and Healthy Workplace

3.7.1 Drug-Free Workplace

In accordance with Noblis' commitment to providing a safe and healthy workplace, and in compliance with the federal Drug-Free Workplace Act of 1988, it is the policy of Noblis to maintain a drug-free workplace. Please refer to the Noblis *Drug-Free Workplace Policy*, located in the QMS, for details.

3.7.2 Tobacco Free Workplace

In accordance with Noblis' commitment to providing a safe and healthy workplace for all employees, Noblis has implemented a no tobacco/nicotine policy within Noblis' facilities as well as in Noblis owned or leased vehicles. For the purpose of this policy, facilities include all property owned, operated, leased or maintained by Noblis, and include all surrounding parking lots, walkways, lawns and similar areas except designated areas. All occupants in such facilities are required to comply with this policy. Anyone who wishes to use tobacco/nicotine can do so outside Noblis facilities in designated areas.

3.7.3 Workplace Violence

Noblis does not tolerate workplace violence. Any action that may be indicative of workplace violence such as an actual or perceived threat or actual violence must be immediately reported to Security and HR.

3.7.4 Safe Operation of Vehicles

Noblis requires the use of safety belts by all employees and their passengers while operating or traveling in a Noblis-owned vehicle or in a personally owned or rental vehicle on Noblis business. Employees are required to comply with laws regarding the use of electronic devices such as cell phones and other hand-held devices while driving on Noblis business.

3.8 Employee Records and Personnel Files

Once Noblis hires an individual, documents related to that individual's employment become the foundation upon which his or her Personnel File is built. Contents of Employee files are the property of Noblis. An individual's Personnel File may contain general information regarding the individual's job history, performance, salary, training and other related

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documents. Personnel Files are considered confidential. An individual's Personnel File may contain information such as:

- pre-employment reference check documentation;
- salary analysis documentation used to determine the salary a new employee should be offered;
- documents regarding specific types of salary increases;
- notes of counseling sessions for career advancement; or
- other similar information.

3.8.1 Access to Personnel File

While Personnel Files are Noblis property, Noblis will allow reasonable access by current employees and others as specified in this policy, or as otherwise deemed appropriate by Noblis management. Access to such file means the ability to review an online file or receive a paper copy if requested in writing to Human Resources.

3.8.2 Access to Personnel File by Employee

A current employee may review his or her Personnel File by making an appointment with a Human Resources representative to do so. He or she may also obtain copies of documents in his or her Personnel File upon written request to the Vice President and Chief People Officer.

3.8.3 Access to Personnel File by Management

A manager may review the Personnel Files of his or her subordinates at any time. Management may also review the Personnel Files of individuals seeking a transfer or promotion into the manager's internal organization. This authority may not be delegated.

3.8.4 Access to Personnel File for Background Investigations Related to Security Clearances.

The Corporate Security Department and the Defense Security Service may access an employee's Personnel File solely for the purpose of determining whether the individual may obtain or retain a security clearance.

3.8.5 Access to Personnel File by Government Personnel for Purposes Unrelated to Background Investigations Related to Security Clearances

Government personnel authorized by General Counsel may review Personnel Files, as required during the course of government investigations.

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3.8.6 Employee Data Privacy and Disclosure of Information in a Personnel File, Employment References and Recommendations

Noblis has a commitment to employee data privacy and the protection of employee personal data. We respect every employee's confidentiality of personally identifiable information (PII), including health information (PHI). Employees who are responsible for maintaining PII and PHI for our employees must comply with all privacy laws and regulations.

3.8.7 Correcting Personnel File

If an individual believes that information contained in his or her Personnel File is inaccurate or inappropriate for inclusion in the Personnel File, the individual may submit a written request to the Vice President and Chief People Officer to correct or purge the information. If the individual's request is denied, he or she may submit a statement to be retained in the Personnel File stating his or her position regarding the information in question.

If an individual wants to correct or supplement personal information in his or her Personnel File, such as employment history, educational status, or other similar information, the individual must inform Human Resources in writing of the corrections or the supplemental information.

3.8.8 Separation of Employment

Employment with Noblis is at will. Noblis may end the employment relationship with or without cause at any time and for any reason, including without limitation, to a reduction in the workforce, disciplinary reasons or for any other reason. The employee may also end the employment relationship at any time and for any reason, including but not limited to resignation or retirement.

3.8.9 Voluntary Separation

A termination initiated at the employee's request or action is considered to be voluntary separation. While employees are encouraged to give at least two (2) weeks' notice of their planned termination date for resignation and four (4) weeks' notice for retirement, Noblis may accelerate the termination date for the benefit of the Company and the termination will remain classified as a voluntary separation.

Examples of voluntary separation include:

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- An employee who elects to resign or retire from Noblis.
- Failure to return from an approved leave of absence on the date specified.

In unusual circumstances, an employee may be precluded from complying with the resignation or retirement notification requirement. In such circumstances, Noblis, in its sole discretion, may make an exception and determine the lack of notification was justifiable. Employees voluntarily terminating their employment are not eligible for severance pay, except at the discretion of, and pursuant to the terms established by Noblis.

Employees may not extend their resignation date by using Paid Time Off or any other absence code. Noblis may, in its sole discretion, elect to provide a resigning employee with pay instead of continuing their employment during the notice period, with a not-to-exceed period of four (4) weeks of pay. For more information, see the *Separation Procedure*, located in the QMS.

3.8.10 Involuntary Termination

Dismissal by Noblis for any reason not defined as voluntary constitutes involuntary termination. Involuntary termination includes but is not limited to:

- Reduction in force;
- Lack of work;
- Lay off;
- Job elimination;
- Job abandonment which is typically a failure to report to work without notice to Noblis for three (3) consecutive business or regularly scheduled workdays
- Poor performance;
- Disciplinary actions; and
- Violation of the Noblis Code of Ethics and Conduct Policy or certain other Noblis policies or procedures.

Upon termination of employment, employees will receive all final pay in accordance with the appropriate federal and state laws. All Company owned assets must be returned to Noblis on the employee's last day of employment. Human Resources will explain benefit continuation to the terminating employee, and whenever possible, will arrange an exit interview. For more information, see the *Separation Procedure*, located in the QMS.

3.8.11 Exit Procedures

Employees are expected to comply with Noblis' separation and termination procedures, regardless of the type of termination. Employees selected for involuntary termination for business reasons or other employees who, at the discretion of Noblis, are eligible to

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receive notice or severance pay must comply with Noblis' exit procedures and a signed release in order to receive such pay.

3.5.1 Final Pay

Employees whose last day of active employment is on or before the day prior to a holiday, the employee will not be paid for the holiday. Noblis will pay employees the value of their unused, accrued PTO upon termination of employment. Noblis may deduct appropriate amounts of monies owed by employees to Noblis from the employee's last paycheck.

4 DEFINITIONS

The term Noblis, as used in this policy, is deemed to refer to Noblis and its subsidiaries, as applicable.

Additional terms and definitions required by this policy may be found in the Quality Manual and Policy as well as under the Terms and Definitions list on the QMS.

5 RESPONSIBILITIES

It is the responsibility of every employee to adhere to this policy.

RELATED DOCUMENTS

Public Release of Information Policy
Public Release of Information Procedure
Public Release of Information eForm
Noblis Code of Ethics and Conduct Policy
Talent Acquisition Procedure
Talent Resource Management Procedure
Employment of Federal Government Employees Procedure
Employment-Consulting Discussions Clearance Form and Questionnaire
Employment Eligibility Verification Form (US Department of Justice Form I-9)
Onboarding Procedure
Outside Employment Form
Proprietary and Confidential Information, Developments and Non-Solicitation Agreement Form
Social Media Policy
Employment Eligibility Procedure
Protecting Controlled Unclassified Information Policy
Honorarium Work Instruction
Drug-Free Workplace Policy
Workplace Policy

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Workplace Procedure
Employee Separation Procedure