



ORCHID EMPLOYEE HANDBOOK

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INTRODUCTION

Welcome! As an employee of Orchid (referred to throughout this Handbook as either “Orchid” or the “Company”), you are an important member of a team effort. We hope that you will find your position with the Company rewarding, challenging, and productive.

Every provision in this Handbook is intended for business application (whether or not we have identified business reasons or examples), and no provision should ever be read to interfere with—and should never deter you from—the full exercise of your legal rights, which we respect and will protect regardless of any interpretation of this Handbook.

PURPOSE

This Handbook summarizes the policies and practices in effect at the time of publication. Orchid reserves the right to alter, modify, amend, or terminate Company policies and benefits in a manner it believes to be in the Company’s and its employees’ best interests. In addition, where insurance or retirement plans are concerned, the terms of the policies or official plan documents control, regardless of any statements contained in this Handbook to the contrary.

SCOPE

This Employee Handbook applies to all Orchid employees and supervisors in all states except California. All policies and practices will be administered in accordance with applicable federal, state, and local laws, legislation and regulations.

There are state-specific Addendums in the back of the Handbook. Please carefully read the main portion of the Handbook, as well as the Addendum that applies to the state in which you work. To the extent that there is a conflict between the general portion and the state-specific Addendums, the statements in the state-specific Addendum apply.

This Handbook supersedes all previously issued handbooks and any verbal or written policy statements.

The attached Employee Acknowledgement and Agreement form describes the terms and conditions of employment that are binding and enforceable promises between each employee and Orchid. All other provisions of this Handbook are intended as guidelines and a general description of employment terms and benefits. Orchid recognizes an employee’s right to terminate employment without cause or notice and Orchid retains the same right. No manager, employee, or representative of Orchid, other than the Chief Executive Officer, has any authority to enter into any agreement for employment for any specific or definite period of time or to make any agreement contrary to the terms of this Handbook. Any such agreement must be made in writing and signed by the Chief Executive Officer to be effective.

This Handbook should be accessed electronically (for the most current version) and printed from Company computers if desired. Each employee should read this Handbook in its entirety. Your supervisor or manager will be happy to answer any questions you may have. Each employee is required to sign the Employee Acknowledgment and Agreement Form. Continued employment at Orchid shall be considered as acceptance of all provisions of the Handbook and acceptance of the terms of the Employee Acknowledgment and Agreement.

VISION, MISSION, AND VALUES

At Orchid, we realize the importance of being clear about our Vision, Mission, and Values – why we do what we do and how we go about doing it with and for our customers, employees and supplier partners.

VISION

Be the Premier Provider of Orthopedic Implant Solutions

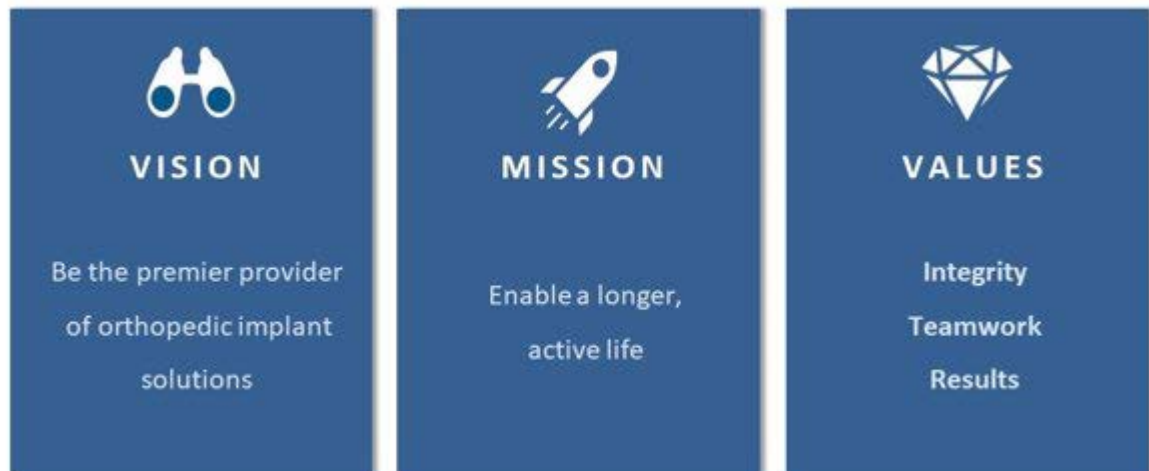
MISSION

Enable a Longer Active Life

VALUES

Our core values are the foundation of our culture and strategy, so we met as a leadership team to update and clarify them to be more descriptive of our culture, what is most important to us, and what we believe in.

- Integrity – We Do the Right Thing
- Teamwork – We are One Orchid
- Results – Our Results Matter



GENERAL POLICIES

AT- WILL EMPLOYMENT

Orchid personnel are employed on an at-will basis. Employment at-will means that the employment relationship may be terminated with or without cause and with or without advance notice at any time by the employee or the Company. Nothing in this handbook shall limit the right to terminate at-will employment. No manager, supervisor, or employee of the Company has any authority to enter into an agreement for employment for any specified period of time, or to make an agreement for employment on other than at-will terms. Only the Chief Human Resource Officer of Orchid has the authority to make any such agreement, which is binding only if it is in writing.

Nothing in this at-will statement is intended to interfere with an employee's rights to communicate or work with others toward altering the terms and conditions of employment.

EQUAL EMPLOYMENT OPPORTUNITY

See Orchid Employee Handbook Addendum

HARASSMENT DISCRIMINATION AND RETALIATION PREVENTION

Orchid is an equal opportunity employer. Orchid is committed to providing a work environment free of harassment, discrimination, retaliation, and disrespectful or other unprofessional conduct based on race, religion (including religious dress and grooming practices), color, sex/gender (including pregnancy, childbirth, breastfeeding or related medical conditions), sex stereotype, gender identity/gender expression/transgender (including whether or not transitioning or have transitioned) and sexual orientation, national origin (including language use restrictions and possession of a driver's license issued to persons unable to prove their presence in the United States is authorized under federal law (Vehicle Code section 12801.9), ancestry, physical or mental disability, medical condition, genetic information/characteristics, marital status/registered domestic partner status, age (40 and over), sexual orientation, military and veteran status or other basis protected by federal, state, or local law ordinance or regulation.

It also prohibits discrimination, harassment, disrespectful or unprofessional conduct based on the perception that anyone has any of those characteristics, or is associated with a person who has or is perceived as having any of those characteristics.

In addition, Orchid prohibits retaliation against individuals who raise complaints or discrimination or harassment or who participate in workplace investigations.

All such conduct violates Company policy.

Harassment Prevention

Orchid's policy prohibiting harassment applies to all persons involved in the operation of Orchid. Orchid prohibits harassment, disrespectful or unprofessional conduct by any employee of Orchid, including supervisors, managers and co-workers. Orchid's anti-harassment policy also applies to vendors,

customers, independent contractors, unpaid interns, volunteers, persons providing services pursuant to a contract and other persons whom you come into contact with while working.

- Prohibited harassment, disrespectful or unprofessional conduct includes, but is not limited to the following behavior:
- Verbal conduct such as epithets, derogatory jokes, or comments, slurs or unwanted sexual advances, invitations, comments, posts or messages.
- Visual displays such as derogatory and/or sexually-oriented posters, photography, cartoons, drawings or gestures.
- Physical conduct including assault, unwanted touching, intentionally blocking normal movement or interfering with work because of sex, race or other protected basis.
- Threats and demands to submit to sexual requests or sexual advances as a condition of continued employment, or to avoid some other loss and offers of employment benefits in return for sexual favors.
- Retaliation for reporting or threatening to report harassment; and
- Communication via electronic media for any type that includes any conduct that is prohibited by state and/or federal law or by company policy.

Sexual harassment does not need to be motivated by sexual desire to be unlawful or to violate policy. For example, hostile acts toward an employee because of gender can amount to sexual harassment, regardless of whether the treatment is motivated by sexual desire.

Prohibited harassment is not just sexual harassment but harassment based on any protected category.

Non-Discrimination

Orchid is committed to compliance with all applicable laws providing equal employment opportunities. This commitment applies to all persons involved in the Company operations. Orchid prohibits unlawful discrimination against any job applicant, employee or unpaid intern by any employee of Orchid, including supervisors and coworkers.

Pay discrimination between employees of the opposite sex performing substantially similar work as defined by the California Fair Pay act and federal law, is prohibited. Pay differentials may be valid in certain situations defined by law. Employees will not be retaliated against for inquiring about or discussing wages. However, Orchid is not obligated to disclose the wages of other employees.

Anti-Retaliation

Orchid will not retaliate against you for filing a complaint or participating in any workplace investigation and will not tolerate or permit retaliation by management, employees or coworkers.

Reasonable Accommodation

Discrimination can also include failing to reasonably accommodate religious practices of qualified individuals with disabilities where the accommodation does not pose an undue hardship.

To comply with applicable laws ensuring equal employment opportunities to qualified individuals with a disability, Orchid will make reasonable accommodations for the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or an employee unless undue hardship would result.

Any job applicant or employee who requires an accommodation in order to perform the essential functions of the job should contact Human Resources and discuss the need for an accommodation. Orchid will engage in an interactive process with the employee to identify possible accommodations, if any that will help the applicant or employee perform the job. An applicant, employee or unpaid intern who requires an accommodation of a religious belief or practice (including religious dress and grooming practices, such as religious clothing or hairstyles) should also contact Human Resources and discuss the need for an accommodation. If the accommodation is reasonable and will not impose undue hardship, Orchid will make the accommodation.

Orchid will not retaliate against you for requesting a reasonable accommodation and will not knowingly tolerate or permit retaliation by management, employees, or co-workers.

Complaint Process

If you believe that you have been the subject of harassment, discrimination, retaliation or other prohibited conduct, bring your complaint to your supervisor, any other Company supervisor, or Human Resources as soon as possible after the incident. You can bring the complaint to any of these individuals. If you need assistance with your complaint, or if you prefer to make a complaint in person, contact the HR representative. Please provide all known details of the incident or incidents, names of individuals involved and names of any witnesses. It would be best to communicate your complaint in writing, but this is not mandatory.

Orchid encourages all individuals to report any incidents of harassment, discrimination, retaliation or other prohibited conduct forbidden by this policy immediately so that complaints can be quickly and fairly resolved.

You should also be aware that the Federal Equal Employment Opportunity Commission and the California Department of Fair Employment and Housing investigate and prosecute complaints of prohibited harassment, discrimination and retaliation in employment. If you think you have been harassed or discriminated against or that you have been retaliated against for resisting, complaining, or participating in an investigation, you may file a complaint with the appropriate agency. The nearest office can be found by visiting the agency websites at www.eeoc.gov.

Supervisors must refer all complaints involving harassment, discrimination, retaliation or other prohibited conduct to Human Resources so Orchid can try to resolve the complaint. When Orchid receives allegations of misconduct, it will immediately undertake a fair, timely, thorough and objective investigation of the allegations in accordance with all legal requirements. Orchid will reach reasonable conclusions based on the evidence collected.

Orchid will maintain the confidentiality to the extent possible. However, Orchid cannot promise complete confidentiality. The employer's duty to investigate and take corrective action may require the disclosure of information to individuals with a need to know.

Complaints will be:

- Responded to in a timely manner
- Kept confidential to the extent possible
- Investigated impartially by qualified personnel in a timely manner
- Documented and tracked for reasonable progress
- Given appropriate options for remedial action and resolution
- Closed in a timely manner

If Orchid determines that harassment, discrimination, retaliation or other prohibited conduct has occurred; appropriate and effective corrective and remedial action will be taken in accordance with the circumstances involved. Orchid will also take appropriate action to deter future misconduct.

Any employee determined by Orchid to be responsible for harassment, discrimination, retaliation or other prohibited conduct will be subject to appropriate disciplinary action, up to, and including termination. Employees should also know that if they engage in unlawful harassment, they can be held personally liable for the misconduct.

PAY TRANSPARENCY NONDISCRIMINATION PROVISION

The contractor will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor's legal duty to furnish information. 41 CFR 60-1.35(c)

HIRING

EMPLOYMENT ELIGIBILITY

Orchid, in accordance with state and federal laws and with its own criteria for positions, requires current and prospective employees to meet the eligibility requirements described in this policy to be employed.

Orchid is committed to employing only United States citizens and foreign nationals who are authorized to work in the United States, and does not unlawfully discriminate on the basis of citizenship or national origin.

All employees must fulfill eVerify requirements, complete an I-9 and provide verification documents and/or USCIS requirements within three (3) working days of the commencement of employment date. Failure to do so will result in employment termination or non-selection of an applicant.

BACKGROUND CHECKS

In an effort to provide a safe work environment and competent workforce, the Company shall conduct background checks on current and/or prospective employees consistent with state and federal law. Background checks may include investigation into an individual's educational, employment and/or criminal background.

Criminal record checks will be conducted in accordance with applicable law. Unless otherwise provided by law, a criminal record will not automatically disqualify an individual from employment. Rather, the Company will consider the age and time of the offense, the seriousness and nature of the violation, and the extent of rehabilitation since the offense to determine whether a substantial relationship exists between the individual's current or prospective position

Information collected in connection with a background check will be treated confidentially to the extent permitted by federal and state law. Any falsification of information on an employment application or any other application material is grounds for termination of employment or non-selection of an applicant.

INTRODUCTORY PERIOD

New employees will be provided the training and orientation necessary to familiarize themselves with the Company and their assigned jobs. This orientation period will also allow new employees to acquaint themselves with Company rules, procedures and policies.

The first 90 days of employment are considered to be an Introductory Period for both a new employee and Orchid. The employee can evaluate the job and work environment to decide if is the employee is suited to Orchid and the position, and Orchid can evaluate the employee's skills and performance to determine whether the employee is able to fulfill the expectations of the position. Near the end of the introductory period, Orchid will usually conduct an evaluation of the employee's performance to identify areas of strength or areas requiring improvement.

The completion of your introductory period does not in any way change the nature of your at-will employment relationship as defined elsewhere in this handbook, nor does it assure benefits eligibility.

JOB DUTIES

Each supervisor will explain the employee's job responsibilities and the performance standards expected. Be aware that job responsibilities may change at any time during employment. From time to time, an employee may be asked to work on special projects, or to assist with other work necessary or important to the operation of the department or Orchid. The employee's cooperation and assistance in performing such additional work is expected.

Orchid reserves the right, at any time, with or without notice, to alter or change job responsibilities, reassign or transfer job positions or schedules, or assign additional job responsibilities.

BRIDGING OF TIME

Orchid will give service time credit to employees previously employed by the Company, provided the break in service does not exceed 365 days. The break in service time will be deducted from the employee's original service date for purposes of calculating length of service. Length of service impacts:

- PTO Accrual Levels
- Benefits (if applicable)

If the break in service is in excess of 365 days, previous service time is lost.

ABSENCE FROM WORK

BEREAVEMENT LEAVE

It is the policy of the Company to provide an employee with reasonable time off for a death in the family. All full-time employees who have successfully completed their Introductory Period will be eligible for up to 3 days of paid Bereavement Leave for immediate family members and others connected by birth, adoption, marriage, civil partnership or cohabitation.

Immediate family includes current spouse, domestic partner, children (including current step, foster and adopted), siblings (including current step and half), parents (including current step), grandparents, grandchildren, and parallel relatives in marriage (in-laws). Immediate family does not include, for example, former parallel relatives in marriage, or former step siblings, children, parents or grandparents, or aunts, uncles or cousins.

Bereavement leave should be taken within 30 days of the death of family member.

FAMILY MEDICAL LEAVE

The Company will provide eligible employees with unpaid leave for covered family and medical reasons, in compliance with the Family and Medical Leave Act (FMLA) and expanding coverage to all Orchid locations.

Eligibility: Employees are eligible for FMLA leave only if they have at least 12 months of services, have worked at least 1,250 hours in the past 12 months, and work at a covered location. A location is covered if at least 50 employees of the Company work within a 75-mile radius. Orchid considers all locations covered.

Basic Leave Entitlement: Eligible employees may take up to a total of 12 workweeks of leave in any 12-month period for the following reasons:

- For the employee's own serious health condition (defined below) that makes them unable to perform the essential functions of the employee's job.
- To care for the employee's spouse, child, or parent with a serious health condition.
- For incapacity due to pregnancy, prenatal medical care or child birth.
- To care for the employee's child after birth, placement for adoption, or foster care placement.
- For an employee's "qualifying exigency" resulting from the fact that the employee's spouse, parent, son or daughter (1) is a member of a regular component of the Armed Forces and is deployed (or has been notified of an order of deployment) with the Armed Forces to a foreign country; or (2) is a member of a reserve component of the Armed Forces and is deployed (or has been notified of an order of deployment) with the Armed Forces to a foreign country under a call or order to active duty. Qualifying exigencies may include attending certain military events, arranging for alternative childcare, addressing certain financial and legal arrangements, attending certain counseling sessions, and attending post-deployment and reintegration briefings.

The amount of FMLA leave time an employee has available (for the above reasons) on any given date is equal to 12 weeks minus the amount the employee has used in the preceding 12 months.

Service Member Family Leave: An eligible employee may request up to 26 weeks of FMLA leave in a single FMLA year to care for the employee's spouse, son, daughter, parent, or next of kin who is a covered service member. A covered service member is either:

- A current member of the Armed Forces who
 - incurred or aggravated a serious illness or injury in line of duty on active duty.
 - may be medically unfit to perform the duties of office, grade, rank or rating because of the serious illness or injury; and
 - is undergoing medical treatment, recuperation or therapy, or is otherwise in outpatient status, or is otherwise on the temporary disability retired list for a serious injury or illness.

or

- A veteran of the Armed Forces who
 - incurred or aggravated a qualifying injury or illness in line of duty on active duty.
 - is undergoing medical treatment, recuperation or therapy for a serious injury or illness; and
 - was a member of the Armed Forces at any time during the 5 years preceding the date on which the veteran undergoes that medical treatment, recuperation, or therapy.

In a year in which an employee uses leave to care for a covered service member, 26 weeks is the maximum amount of FMLA leave that the employee may use in total for all types of FMLA leave.

Definition of a Serious Health Condition: A "serious health condition" is an illness, injury, impairment, or physical or mental condition that involves either:

- an overnight inpatient stay in a medical care facility, or
- continuing treatment by a health care provider for a condition that either prevents the employee from performing the essential functions of the employee's job, or prevents the qualified family member from participating in work, school, or other daily activities. Subject to certain conditions, the continuing treatment requirement may be met by:
 - A period of incapacity of more than 3 consecutive full calendar days combined with either (a) at least 2 visits to a health care provider within certain time frames, or (b) one visit to a health care provider within a certain time frame and a regimen of continuing treatment.
 - Incapacity due to pregnancy or prenatal care.
 - Incapacity due to a chronic condition that continues for an extended period and requires at least two visits to a health care provider per year for treatment; or
 - Permanent or long-term incapacity, or conditions requiring multiple treatments.

Employee's Responsibility to Give Notice of the Need for Leave: Employees must notify Unum (who manages Orchid's leaves of absence) and Orchid Human Resources of any need to take FMLA leave (including any absence, late arrival, or early leaving related to FMLA leave). Employees must give this notice at least 30 days in advance of a foreseeable need for FMLA leave. If it is impossible to give 30 days' advance notice, employees must notify appropriate parties as soon as practicable. *Employees must follow all Company rules for calling in to report absence, tardiness, or early leaving.*

Employees must request a leave by filing a claim online with Unum www.unum.com or by calling 866-779-1054 to file a claim over the phone. When requesting FMLA leave, employees must provide

sufficient information for Unum to determine whether the leave qualifies as FMLA leave: The following will need to be provided:

- Employee Name
- Employee last 4 digits of Social Security Number
- Employee Address and Phone Number
- Request for Continuous or Intermittent FMLA
- Start Date of Leave and estimated duration of leave of absence
- Physician's Contact and fax information
- Description of illness or injury
- Job Title and brief description of the job

Employees must also inform their supervisor and the Human Resources Department of the plan to file a request for leave of absence.

Once an employee has requested FMLA leave, Unum will inform the employee whether they are eligible to take FMLA leave and explain the employee's rights and responsibilities under FMLA. Unum will update Orchid with claim and leave of absence activity and or status changes.

Notice upon Return from Leave: The employee must communicate directly with Unum of their status. Unum will provide regular updates to Orchid.

Medical Certification: Unum will request and manage the medical certifications.

Communication with the Employee: Unum will communicate directly with the employee.

Intermittent and Reduced Schedule Leave: Unum will work with employees to manage reduced work schedule requirements.

Insurance Benefits during FMLA Leave: The Company will maintain the employee's health coverage under any group health plan for covered FMLA leave. The employee will have the option to either pay the employee-portion of premiums while on leave or can elect to pay premiums upon return from leave. Payment upon return will be in the form of catch-up deductions in each payroll. Premiums will be doubled until past due premiums are repaid in full.

Employees who fail to return from a leave will be obligated to reimburse the Company for the cost of company-paid health coverage, except when the employee's failure to return is due to the continuation, recurrence or onset of a serious health condition which would entitle the employee to medical or family leave, or other circumstances beyond the employee's control.

Compensation and Using Paid Leave Time during FMLA Leave: Family/medical leaves are unpaid leaves, although an employee may be eligible for short term disability payments and/or Worker's Compensation benefits under insurance plans.

If an employee is approved for FMLA for their own serious medical condition, the employee must use all accrued and available paid time off (PTO) and/or Sick Pay (if applicable) as of the date of leave OR until the employee becomes eligible for benefits from short-term disability and/or Worker's Compensation plans. The employee may also elect to use non-accrued PTO that will be earned during the year until they become eligible for other benefits payments, e.g. short-term disability or Workers' Compensation.

If an employee is approved for FMLA for a Family or Service Member, the employee must use all available accrued paid time off (PTO) and/or Sick Pay until this available time is exhausted **before** an unpaid leave begins.

The use of paid time off (PTO) does not extend the 12 weeks leave limit of FMLA nor will the use of PTO result in the employee receiving more than 100% of the employee's wages.

Impact to PTO Accruals

Orchid employees accrue PTO each calendar month. Employees will not accrue PTO while on leave of absence. The accrual stops on the first pay period when an employee is not paid any hours. The PTO accrual will begin again on the first pay period that the employee returns from leave. Continuous service credit of the employee will continue while on leave of absence.

Contact with the Company during the Leave: While on FMLA leave, employees should report to their status to Unum regarding their status and intention to return to work. Employees must provide a telephone number and address at which they can be contacted.

Returning to Work: Before returning to work from a leave due to the employee's own serious health condition, the employee must provide medical verification of fitness for duty to Unum. Upon return from FMLA leave, most employees will be returned to their original position or an equivalent one, with equivalent pay, benefits and other employment terms. Use of FMLA leave will not result in the loss of any benefit that accrued prior to the start of the leave. Employees will not continue to accrue benefits while taking FMLA leave.

Termination of FMLA Leave: An employee's FMLA leave and accompanying benefits will cease under the following circumstances:

- The employment relationship would have terminated if the employee had not taken FMLA leave.
- The employee informs Unum of their intent not to return from leave.
- The employee fails to return a medical certification as required.
- The employee fails to return to work at the end of an approved FMLA leave and is not approved for additional leave.
- The employee continues on unapproved leave after exhausting their FMLA leave entitlement.
- The employee fraudulently obtains FMLA leave or misuses FMLA leave.
- While on FMLA leave, the employee engages in conduct that is inconsistent with the need for leave; or
- The employee engages in employment with another employer or in self-employment without the Company's approval during FMLA leave.

Work While On Leave: The taking of another job while on family/medical or any other authorized leave of absence is grounds for immediate termination of employment.

Enforcement: Any employee who believes that their rights under the FMLA have been violated is to report this immediately to their supervisor and the Human Resources Department. Any complaint will be investigated thoroughly and promptly. No employee will be retaliated against for making a good faith complaint. The FMLA also states that employees can file a complaint with the U.S. Department of Labor or in an appropriate court.

JURY DUTY

The Company encourages employees to fulfill their civic responsibilities and accept jury duty when summoned. Employees will be excused from work to report for jury examination, answer jury summons or serve as jurors.

Employees must show the jury duty summons to their supervisor as soon as possible so the supervisor may plan to accommodate the absence.

Employees must arrange a regular communications schedule with their supervisor prior to the jury duty leave.

Full-time employees will be paid their normal hourly wage or salary during jury duty, up to a maximum of forty (40) hours during a calendar year unless otherwise required by state law. Employees may keep any stipend received from the court.

It is the Company's expectation that employees will return to work if they are excused by the court and there are at least two (2) hours remaining in the work shift. However employees will not be required to work more than 8 hours, or the total number of hours that the employee is customarily scheduled to work, whichever is less, of combined work and jury duty time in a day.

Human Resources has the right to request a Clerk of the Court's proof of attendance document prior to making payment for jury duty time served.

LONG TERM DISABILITY

An employee who has been unable to return to work after a twenty-six (26) consecutive week disability period and is unable to return to work by the end of the twenty-six (26) weeks is eligible for long term disability benefits under Orchid's plans.

If an employee is unable to return to work by the end of a twenty-six (26) consecutive week disability leave period, Orchid will communicate with the employee to determine the employee's status and estimated date of return to work (if any). The employee's status may be changed to Terminated and employment with Orchid may end.

The employee is eligible for rehire when an employee is determined to be no longer disabled and able to return to work. Physician's statement will be required to support fitness for duty.

MILITARY LEAVE

The Company supports employees who serve in the military, either on a full-time or reservist basis, and will grant qualified employees leaves of absence for the time required for military service and provide returning service men and women with all rights and benefits required by law. Please contact Human Resources if you have questions regarding the Company's Military Leave policy.

PERSONAL LEAVE

The Company recognizes the possible need for an employee's personal leave of absence for unique or extenuating circumstances. It also recognizes that leaves of absence are disruptive to operating

requirements and contribute significantly to increasing costs of operations. The following guidelines are therefore established to manage personal leaves and to provide employees with guidance on how to request approval for such leaves. This policy does not apply to leaves that qualify under the Family Medical Leave Act, Americans with Disabilities Act or other statutory or protected leaves.

The decision to approve a Personal Leave and length of any Personal Leave will be determined by the management of each plant. Factors to the decision may include (but are not limited to) current operating conditions, potential impact to operations, and additional costs incurred as a result of the Personal Leave.

Employees cannot be granted more than one Personal Leave during a rolling 12-month period and the leave is generally not to exceed thirty (30) days. Any exception to this must be approved by the General Manager or Site Leader.

To request leave, the employee must apply for leave with Unum at www.unum.com or call the claim into 866-779-1054. The expectation is that these requests are made at least thirty (30) days prior to the requested time off. Unum will consult with Human Resources to review and approve or disapprove the request for personal leave.

- In the event the leave is not foreseeable, the employee must submit the request as soon as practicable; generally within 2 days of learning of the need for a leave.
- In the event that the employee is unable to submit the formal request, the matter should be referred to Human Resources by the supervisor.
- Positions are not guaranteed during a Personal Leave. The Company reserves the right in the event of business necessity to fill a vacancy left by an employee on personal leave. If the position is no longer available, the employee may be terminated from employment. The employee is eligible to apply for positions that they are qualified for when able to return to work. The continuous service credit of the employee will continue while on leave of absence.
- Employees' PTO will run currently with the leave. All accrued unused PTO is exhausted before the leave will become unpaid.
- If an employee is able to return to work prior to the expiration date of the leave of absence, the employee should contact Unum for processing and approval of an early return to work.
- It is the sole responsibility of employees on a leave of absence to keep their supervisor informed of their status on returning to work or in the event of a need for an extension of their leave of absence.
- Should an employee fail to contact their supervisor within three (3) consecutive working days after the expiration date of the leave of absence, the employee's status will be changed to voluntary resignation from the Company.
- During an approved personal leave, Orchid will maintain the employee's health benefits. Employees must make arrangements with HR to ensure the employee-portion of premiums is paid.

WORK FURLOUGH

When a reduction in work hours has been deemed necessary to respond to a temporary decline in production, employees within the affected job classification(s) will be placed on temporary work furlough for a period of up to 60 days (exceptions may be approved by corporate leadership).

Selection will be based on business needs and employee skill sets. Other factors that will be considered are performance, attendance, and length of service.

A work furlough is considered a leave with eligibility for recall for up to sixty days (exceptions may be approved by corporate leadership). Service credit will be reinstated for those called back.

- If an affected employee has not been called back by the end of the leave, the employee's status will be changed to an involuntary termination.
- If an affected employee does not return to work when recalled, the employee's status will be changed to a voluntary termination.

Contingent upon business needs, requests for voluntary furloughs may be accepted during a temporary work force reduction situation.

Employees meeting the criteria during temporary furlough conditions, who are currently on a leave of absence, will be placed on temporary work furlough upon receipt of a medical release or the expiration of the leave.

During a furlough, Orchid will maintain the employee's health benefits for up to 60 days (or for an extended period as approved by Corporate leadership), if payment of the employee-portion of premiums is coordinated with Human Resources.

BENEFITS

BENEFITS ELIGIBILITY

Eligibility for Company benefits is based on employment status, according to the established definitions below.

Full Time: Employees regularly scheduled to work at least forty (40) hours per week. Full time Employees are eligible to receive full-time employee benefits: PTO and Holiday Pay, Other Employee Benefits, Healthcare benefits, and participation in the Retirement Program (up to IRS limits).

Part Time- Health Insurance eligible: Employees regularly scheduled to work 30-39 hours per week. Eligible for pro-rated PTO, pro-rated Holiday pay, Healthcare benefits, and participation in the Retirement Program (up to IRS limits).

Part Time- Health Insurance ineligible: Employees are regularly scheduled to work less than 30 hours per week, up to a maximum of 1,508 hours per calendar year (29 hours/week average). May accumulate total hours worked during the calendar year in any combination of hours per week, but should not consistently average more than 29 hours per week. Refer to PTO and Holiday pay policy for benefits eligibility. Part-time employees are also eligible for participation in the Retirement Program (up to IRS limits).

Paid Interns/Seasonal Employees: Interns/seasonal employees are not eligible for employee benefits except participation in the Retirement Program (up to IRS limits).

INSURANCE BENEFITS

Orchid offers a comprehensive suite of benefits that includes:

- Health Insurance
- Vision Insurance
- Dental Insurance
- Flexible Spending Accounts
- Basic Life & Accidental & Dismemberment Life Insurance
- Supplemental Life Insurance
- Supplemental Accidental & Dismemberment Life Insurance
- Short-Term Disability
- Long-Term Disability

Insurance plan documents shall be controlling as to benefits eligibility claim procedures and plan terms and conditions. Each participant will receive a Summary Plan Description of the benefits provided, eligibility rules, claim procedures, and any required employee contributions. Orchid reserves the right to modify, amend, or terminate any of these benefit plans or insurance policies as Orchid may deem necessary.

EDUCATIONAL ASSISTANCE

Full-time employees who have successfully completed six months of service and are performing at a satisfactory level may be eligible for Educational Assistance. This program is intended to provide financial assistance for employee education and provides tax-free reimbursement up to \$5,250 for higher educational courses at the associate and undergraduate levels. Orchid provides reimbursement up to \$10,000 annually for graduate level and any amount reimbursed over \$5,250 is taxable income. There are some instances where advanced training and certification programs may be allowable for reimbursement depending on their direct impact to improve your skillset in your current position; these programs should be presented and approved on a case by case basis with Human Resources.

Procedures require:

- Company approval **prior** to enrollment of classes in order to receive reimbursement.
 - Failure to seek pre-approval will result in courses not being eligible for reimbursement.
- Coursework must be taken through an accredited institution.
- The coursework and curriculum of the program must apply within the business operations of Orchid and will improve the employee's job-related skills.
- Completion of coursework with "B-" grade/equivalent or higher to receive reimbursement.
- Employee is responsible for paying all tuition and fees, and upon satisfactory completion will provide receipts to Human Resources for review, approval, and reimbursement.
- Reimbursement amounts cannot exceed \$5,250 per calendar year per employee for associate and undergraduate levels.
- Reimbursement amounts cannot exceed \$10,000 per calendar year per employee for graduate level.
- In consideration for financial assistance, the employee agrees, by completion of the Educational Assistance Agreement that should the employee voluntarily leave Orchid's employ, the employee will reimburse the Company in accordance with a twelve month pro-rated schedule for educational reimbursement paid within the past 12 calendar months.

Interested employees are to contact Human Resources for additional details.

HOLIDAYS

Orchid observes nine (9) Company-paid holidays.

The following nine (9) days will be observed. The Company reserves the right to change scheduled holidays due to business need. Additionally, should the stated holiday fall on a weekend, another date may be designated as a replacement holiday. With the one Floating Holiday, the Company reserves the right to designate the floating holiday for any given calendar year*.

- New Year's Day
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day
- Day after Thanksgiving
- Christmas Eve

- Christmas Day
- 1 Floating Holiday*

Except under extenuating circumstances, employees should be notified of any Floating Holiday designations no later than December of the prior year.

Employee eligibility for holiday pay as follows:

- Employees scheduled to work an average of 40+ hours per week will receive 8 hours per holiday.
- Employees scheduled to work an average of 30 – 39 hours per week will receive 6 hours per holiday.
- Employees scheduled to work an average of 20 – 29 hours per week will receive 4 hours per holiday.
- Employees scheduled to work an average of less than 20 hours per week will not be eligible for holiday pay.
- Full Time employees working alternative work schedules will be paid for a total of 72 holiday hours throughout the course of a calendar year. Each site will determine the manner in which the hours will be paid, based on the alternative work schedule for their site.

Eligible employees will receive their regular, straight-time rate of pay for each holiday.

All non-exempt employees must work a full day or have pre-scheduled paid time off on the last scheduled working day before the holiday and work a full day on the first scheduled working day following a holiday to receive holiday pay. Any exceptions must be approved by management and HR.

If a Company observed holiday falls during an employee's scheduled PTO, that day will not be deducted from the employee's PTO bank.

When work is required on a scheduled holiday:

Non-exempt employees will be paid straight time in addition to the holiday pay. Should an employee be on a mandatory schedule to work on a holiday and fail to report to work as scheduled, the employee will forfeit the holiday pay. In all cases, the requirement for working on a holiday will be determined and approved by the appropriate supervisor prior to the holiday.

Exempt employees will be provided a Floating Holiday for future use. The employee's manager must contact Human Resources to coordinate addition of the replacement Floating Holiday to the employee's Floating Holiday account.

Floating holidays may not be carried over into the next year, and unused floating holidays will expire at the end of each year. Additionally, floating holidays are not paid out upon employee termination.

For new employees, the following details eligibility for the floating holiday in a calendar year (in instances where the floating holiday for the calendar year has not been designated).

<u>Date of Hire</u>	<u>Floating Holidays for the Year</u>
January – October	1
November – December	0

LACTATION POLICY

Orchid supports breastfeeding parents by providing reasonable break times for employees to express breast milk for nursing children, and providing appropriate places (other than bathrooms) which may be used by employees to express breast milk.

For up to one and one-half years after the child's birth, any employee who is breastfeeding a child will be provided reasonable break times to express breast milk for the child when the employee has the need to express the milk. The break time shall, if possible, run concurrently with any break time already provided to the employee. If an employee needs additional breaks to express milk, arrangements should be made with the supervisor so that breastmilk can be expressed when needed..

Orchid has private areas for employees to use while expressing breast milk. Some areas are designated as lactation rooms; others are multi-purpose rooms (other than bathrooms) that are shielded from view and free from instruction by co-workers or the public. Employees should ask their managers about the nearest area appropriate for expressing milk. Employees with private offices may be required to use their offices to express breast milk.

Employees are expected to check with their manager on acceptable refrigerator storage locations for expressed breast milk. Any breast milk stored in the refrigerator must be labeled with the name of the employee and the date the breast milk was expressed. Any non-conforming products stored in the refrigerator may be disposed of. Employees storing milk in the refrigerator assume all responsibility for the safety of the milk and the risk of harm for any reason, including improper storage, refrigeration and tampering.

Employees who desire lactation accommodations are encouraged to contact their supervisor or Human Resources to request accommodations two weeks prior to returning to work from leave so arrangements may be made to secure a suitable space.

PAID TIME OFF (PTO) – Corporate, Detroit, Lansing, and Memphis (Other Locations: reference Site-Specific Handbook Addendums)

Paid Time Off (PTO) is time for employees to rest, relax, and pursue special interests. PTO can also be used for illness, emergencies, and personal business. Other forms of paid time off include bereavement and civic duty are tracked separately. This policy establishes employee eligibility for and the amount of PTO accrued based on employee length of service. PTO is accrued on the first day of the calendar month. Employees can use PTO (up to the annual accrual) prior to accruing.

PAID TIME OFF (PTO) – Negative Balances - If used before accruing and then go on a leave of absence

If an employee uses PTO before its accrued and subsequently goes on a leave of absence, they may have a negative PTO balance at the end of the calendar year. If this occurs, the employee may choose to repay the difference and start the next calendar year at a 0 balance or may choose to make up the accrual over the following calendar year and end with a 0 balance by the end of the following calendar year.

Exempt Employees: Exempt employees are paid a salary and are exempt from receiving overtime pay. They are expected to work the hours necessary to fulfill job and business requirements. Exempt employees will generally perform work outside of office hours and are trusted to get their work done. Unlike non-exempt employees, meal and rest breaks are not established. This policy does not allow for deduction of pay from their bi-weekly salary*.

*As permissible by state and/or federal law

Non-Exempt Employees: Non-exempt employees are employees who are paid for every hour worked. They are eligible to receive overtime pay. They are required to record their daily work start and stop times. Non-exempt employees are provided established meal and rest break periods. They must comply with established attendance policies to account for unscheduled time off. Time off is unpaid unless PTO is used.

Grandfathered Employees: Employees that had more favorable benefits prior to Orchid acquisition or after acquisition are considered “grandfathered” employees. Employees that currently have more PTO eligibility than the new policy will not lower their eligibility.

Part-Time Employees:

- Employees scheduled to work an average of 40+ hours per week will receive PTO hours equal to 100% of eligibility.
- Employees scheduled to work an average of 30 – 39 hours per week will receive PTO hours equal to 75% of eligibility, rounded to the closest 4 hour increment.
- Employees scheduled to work an average of 20 – 29 hours per week will receive PTO hours equal to 50% of eligibility, rounded to the closest 4 hour increment.

PTO Payout vs. Rollover:

Non-Exempt employees with unused PTO at the end of the calendar year will be paid out for up to 40 hours of unused PTO.

Exempt employees are able to carry over up to 40 PTO hours into the following calendar year. A separate bank will be designated for the carryover hours. The carryover hours will expire on the December 31 of the carryover year. Additionally, the carryover PTO hours are not eligible for PTO payout should an employee exit employment from Orchid.

Anniversary Dates: When an employee reaches a serviced date that entitles the employee to a higher PTO award, the monthly accrual will increase in the month of the anniversary date.

Employees will accrue PTO based on the following schedules.

EXEMPT EMPLOYEES	
SERVICE TIME	PTO ELIGIBILITY
0 - <5 years	80 hours
5 - <10 years	120 hours
10 or more years	160 hours

NON-EXEMPT EMPLOYEES	
SERVICE TIME	PTO ELIGIBILITY
0 - <5 years	80 hours
5 - <10 years	120 hours
10 or more years	160 hours

PTO Accrual Eligibility

Employees on active status (not on unpaid leave status) will accrue (1/12 of their annual PTO accrual) on the first day of each calendar month.

- New employees will accrue the monthly PTO accrual in their initial pay period, pro-rated for the first month.

For employees whose PTO eligibility will increase due to seniority level, the employee will begin accruing the higher amount of PTO in the pay period of the seniority date change.

Should PTO practices differ in specific locations; these differences will be outlined in the State Addendum.

PTO Handling upon Termination: PTO Accrued/ Not Used, PTO Hours Taken in Excess of Accrual

- PTO Balances Upon Termination: Accrued and unused PTO hours will be paid upon termination (reference PTO Payout vs. Rollover for exceptions).
- PTO Balance Deficits Upon Termination: Because employees are able to use PTO prior to being accrued, if at the date of termination, an employee has been paid more PTO hours than accrued (deficit), he/she is responsible for reimbursing the Company for the number of PTO hours overpaid (PTO hours paid in excessive of PTO hours accrued). At termination, the employee will be expected to authorize reimbursement for this overpayment from their final check.

TRAINING AND DEVELOPMENT

Orchid provides training and/or opportunities for training to enable our employees to improve their performance in serving our customers. Our focus is on reducing cost and meeting or exceeding customer quality, productivity, and delivery requirements.

Supervisors, Human Resources, and Department Managers have a shared responsibility for overall identification, development, implementation and coordination of all training. They will work to assure changes in performance at each location while using resources interdependently for effectiveness.

All training deemed mandatory by the Company for employee development will be arranged through the local Human Resources Department and will be 100% funded by the Company.

WORKPLACE SAFETY

The Company is committed to providing a safe and healthy work environment for everyone. The responsibility for maintaining a safe and healthy working environment is one of the most vital responsibilities shared by Management and Employees. You are encouraged to take an active part in the prevention of accidents.

It is our goal to prevent personal injury to you by administering and posting various safety rules that have been established by the Occupational Safety and Health Administration (OSHA) and the Federal Occupational Safety and Health Act and various state laws. However, no set of rules can ensure safe operations. Each employee must make a personal commitment to following safe procedures and practices at all times. Be sure to acquaint yourself with any safety rules that may apply to your specific job site.

WORK-RELATED INJURIES AND ILLNESSES

It is the policy of Orchid to comply with all applicable state and federal laws concerning benefits due an employee who has suffered a work-related injury or illness.

It is the responsibility of the employee to report any injury or illness they feel is related to work, regardless of perceived severity, to their immediate supervisor or Human Resources **within twenty-four (24) hours** of realizing such condition. The supervisor or Human Resources will then complete a Report of Injury. Human Resources will notify the workers compensation insurance provider as appropriate.

If an employee suffers a work-related injury or illness and is not able to return to work, either due to our inability to provide work within the doctor's restrictions or because the doctor specifies that the employee cannot return to work, the following procedures will apply.

- The time missed will be recorded as Workers' Compensation Leave (and FMLA time off, where applicable) on the employee's record.
- The employee will remain on this leave until such time as they are fully released by their doctor to return to work or Human Resources authorizes their return to work within the doctor's prescribed restrictions.
- If the employee's position has been filled in their absence in accordance with state and federal law, the employee will be eligible for any other open position within or below their present classification for which they are qualified. If a position does not exist the employee will be terminated (except where prohibited by state law).
- Appointments are expected to be scheduled outside of scheduled work hours. In the event that this is not possible, any incremental time missed for the purpose of keeping medical appointments related to the injury or illness will be recorded as "Workers' Compensation" on the employee's attendance record and time taken will be compensated. If applicable, the time will also be designated under the FMLA.

In all cases, the amount and length of compensation for time missed from work due to a work-related injury or illness will be governed by the applicable state statutes. The employee will be compensated by the Company at their straight time rate for time missed from their scheduled day only on the date of injury, where immediate medical attention is required, or for their initial visit to the approved physician where deferred medical attention is appropriate.

During a Workers' Comp leave, Orchid will maintain the employee's health benefits active if the employee-portion of premiums is current. Benefits will be cancelled if premium payments are more than 30 days late.

MANAGEMENT POLICIES

WORKPLACE SEARCHES

For the safety and security of our employees, visitors, customers and property, Orchid reserves the right to inspect the contents of all vehicles, packages, containers and other items brought onto company premises or used/possessed while engaged in company business. Under certain circumstances involving reasonable suspicion of improper conduct (e.g., reasonable suspicion of unauthorized possession of Orchid property, possession of dangerous weapons or firearms, or violation of the Company's drug and alcohol policy, etc.), Orchid may request employees to submit to a search of their personal effects. Refusal to consent to any search may result in disciplinary action up to and including termination. All searches will be conducted with due regard for the privacy of the persons involved.

EMPLOYMENT OF RELATIVES (Nepotism Policy) – Effective September 1, 2022

Purpose of the Nepotism Policy

The employment of family members can cause conflicts of interest, hurt feelings, and limit the diversity of our workforce. Orchid believes in hiring and promoting people based on their knowledge, skills, abilities, and potential. As such, we wish to reduce the potential conflicts of interest that can occur when family members work together.

Definition of Family Members

For the purpose of this policy, a family member is defined as spouse, children, step-children, partner, ex-spouse, parents, step-parents, siblings, step-siblings, aunts and uncles, nieces and nephews, grandparents, grandchildren, or cousins. In-laws (or partner's family) are also considered family. Other non-family relationships can be considered on a case-by-case basis.

Nepotism Policy

No family members shall:

- Have any reporting relationship between them. Specifically, they may not report to each other or report one layer down. I.e., they must report to different functions or there must be at least two layers of supervision/management between them, nonexempt team leaders do not count as a reporting layers. Nonexempt team leaders may not lead family members in their area.
- Oversee processes that could affect a family member. For instance, HR employees may not be a business partner, employee relations manager, or compensation supervisor over any department that the family member is in.
- Participate in any disciplinary or reward decision that directly affects an individual family member.
- Employees cannot be part of a hiring committee when a relative is considered for the position.

This policy shall be enforced when hiring, promoting, or transferring employees.

When dealing with outside firms, either as vendors, clients, or service providers, these same guidelines shall apply.

Should relationships addressed within this policy be identified with either candidates for employment or current employees the matter should be immediately reported to Human Resources and the following policies and procedures will be followed:

- A determination will be made whether the relationship is subject to the Nepotism policy based on the conditions described above.
- If the relationship is determined to fall within one or more of the conditions described in this policy the HR in consultation with the affected employees will attempt to resolve the situation through the transfer of one employee to a new position or identifying some other action (e.g., Supervisory reassignment) which will correct the conflict or issue identified.

If accommodations are not feasible then, with affected employee suggestions, the CHRO shall determine which employee must resign in order to resolve the situation.

When Relationships Change

The company understands that family relationships can change throughout employment. People may date and marry over the course of employment.

If a new relationship violates the nepotism policy (for example, a new romantic relationship, a family marriage that creates an aunt/uncle/niece/nephew relationship), report the change or potential change to your Human Resources representative as soon as possible. Human Resources will work with you, your family member, and your manager(s) to find a solution that doesn't violate the nepotism policy.

If you have any concerns about relationships within the business, please notify the Human Resources Department as soon as possible.

HUMAN RESOURCE RECORDS

Employees have a right to inspect or receive a copy of the personnel records that Orchid maintains pursuant to state law. Certain documents may be excluded or redacted from their personnel file by law, and there may be legal limitations on the number of requests that can be made. Any request to inspect or copy personnel records must be made in writing to Human Resources.

Disclosure of personnel information to outside sources, other than the designated representative, will be limited. However, Orchid will cooperate with requests from authorized law enforcement or local, state, or federal agencies conducting official investigations and as otherwise legally required.

NAMES AND ADDRESSES/CONTACT INFORMATION

Orchid maintains a personnel file for each employee. It is each employee's responsibility to keep Orchid informed of their current mailing address, home telephone number, and person to contact in case of an emergency.

Also, if you have a change in your dependents and/or beneficiaries, please contact Human Resources. This information is required to be kept up to-date for purposes of benefits and withholding for taxes. Failure to notify Human Resources of a change in dependents within 30 days of the event will result in benefit ineligibility.

PRIVACY OF SOCIAL SECURITY NUMBERS

Each employee is required to present a valid Social Security Number (SSN) upon hire and maintain it throughout employment, so that the Company can process payroll and make required tax reports and payments. Orchid respects employees' legitimate concerns about the privacy of their SSNs. For that reason, the Company maintains a policy to protect the confidentiality of the SSNs that are obtained by or provided to the Company or its personnel in the course of Company business.

All documents containing SSNs must be kept in confidential files. No employee is permitted to have access to SSNs (including documents that contain any SSNs), to request or require an employee or applicant to transmit their SSN, or to send a SSN to another person, unless the access is (1) authorized by a manager, and (2) reasonable and necessary for legitimate business purposes. A person authorized to access SSNs is prohibited from using or accessing the SSN in any way that might permit an unauthorized individual to view, use, or access the number. No employee may keep, record, view, use, copy, disclose, or distribute SSNs (or documents containing SSNs) in a way that would disclose another person's SSN in a public way. No employee may disclose or distribute SSNs to any person who is not expressly authorized to access SSNs for legitimate business purposes.

When documents or electronic records containing SSNs are no longer needed and are to be discarded, such records must be disposed of in a manner that ensures the confidentiality of the SSNs to the extent practicable, as required by law. Orchid has facilities available for shredding, electronically deleting, or otherwise disposing of documents containing SSNs. In each case, you should contact your immediate supervisor to obtain instructions for the specific method to be used, and to confirm that the appropriate disposal has been completed.

Violation of this policy is subject to disciplinary action, up to and including termination

OPEN-DOOR POLICY

Suggestions for improving Orchid are always welcome. If any employee should have a complaint, suggestion, or question about the job, working conditions, or the treatment being received, we ask the employee to follow these steps:

- Within a week of the occurrence, bring the situation to the attention of the immediate supervisor, who will then investigate and provide a solution or explanation.
- If the problem persists, the employee may describe it in writing and present it to Human Resources, who will investigate and provide a solution or explanation. We encourage the employee to bring the matter to Human Resources as soon as possible after he/she believes that the immediate supervisor has failed to resolve it.

- If the problem is not resolved, the problem may be presented in writing to the Chief Human Resource Officer, who will attempt to reach a final resolution. The decision at this level will be final in all cases.
- This procedure, which we believe is important for both the employee and the Company, cannot guarantee that every problem will be resolved to the employee's satisfaction. However, Orchid values the employee's observations. Employees should feel free to raise issues of concern, in good faith, without the fear of retaliation.

PERFORMANCE EVALUATIONS

In order to maintain Orchid's culture as a high performing organization and for Orchid to attain its business objectives, it is necessary that each employee has been given clear performance objectives, receives regular performance feedback and continuously develops skills and competencies.

Each employee will receive periodic performance reviews conducted by their supervisor at minimum every twelve (12) months. The frequency of performance evaluations may vary depending upon length of service, job position, past performance, changes in job duties, or recurring performance problems. The performance evaluations may review factors such as the quality and quantity of the work performed, knowledge of the job, initiative, work attitude, working effectively with others, etc.

The performance evaluations are intended to provide awareness of progress, areas for improvement, and objectives or goals for future work performance.

Favorable performance evaluations do not guarantee increases in salary or promotions. Salary increases and promotions are solely within the discretion of Orchid and depend upon many factors in addition to performance.

After the review, the employee will be required to sign the evaluation to acknowledge that it has been presented, the content of the evaluation has been communicated, and the employee is aware of its contents.

WORKPLACE PRIVACY

Employees may not use any audio or video recording devices in work areas or in the course of conducting business.

The company uses or may use video surveillance in public areas (not in locker rooms, restrooms or changing areas). The video surveillance will not include audio recording.

COMPANY PROPERTY

TECHNOLOGY AND ELECTRONIC COMMUNICATIONS

All Orchid computer systems, computer software, diskettes, email, voicemail, telephone systems, fax machines, wire services, portable electronic devices, and other electronic equipment and services are the property of the Company and are provided for business use. Orchid reserves the right at its sole discretion to access, intercept, monitor, copy, download or disclose any communication, files or information employees create, receive or review on these software, devices and systems at any time and without notice. As a result, employees should not have any expectation of privacy in any electronic information, messages, voice mails, emails, or other files sent, received or stored in any computer, device, system or software owned or paid for by the Company.

Maintenance of Company Property. Orchid technology and electronic communications must be maintained according to Orchid rules and regulations. Computers must be kept clean and employees must exercise care to prevent loss and damage. Prior authorization must be obtained before any Company property may be removed from the premises.

Security. All employees are required to maintain the security and integrity of Orchid systems and information from access by unauthorized persons. A workspace must not be left unattended in a manner that could permit any unauthorized person to obtain access to data. Users may not share passwords or access devices with any other person, except when business needs require and a supervisor has given express authorization. No external or public server or network may be accessed through Orchid systems, except for specific business purposes with express authorization by a supervisor. Any user who is authorized to connect to any outside server or network is obligated to take all necessary measures to ensure the security of Orchid's systems and information. Employees may not install, add, or download any other computer software, program, or file to Orchid's computer system (from a diskette, program, home computer, the Internet, or any outside source) without prior approval by Orchid.

Orchid may periodically need to assign and/or change "passwords" and personal codes for voice mail, e-mail, cell phones, mobile e-mail, etc. Orchid reserves the right to keep a record of all passwords and codes used and/or may be able to override any such password system.

Employees are not permitted to access the electronic communications of other employees or third parties unless directed to do so by Orchid management.

Software. The software programs used in Orchid's communication and information systems are protected by copyright law and by license agreements with the publisher or seller of the software. As a result, individuals who use this software are prohibited from copying, selling, loaning, or giving away software, or using or duplicating it in any way that is not expressly authorized by the license agreement.

Network Communications and Email. All existing Company policies apply to employee use of computers, electronic communications, electronic information, and the Internet. This includes policies that deal with misuse of Company assets or resources. Orchid strictly prohibits the use of communication and information systems for any communication or activity which is obscene, pornographic, profane, abusive, defamatory, derogatory, offensive, a violation of any civil or criminal law or statute, or a violation of any Orchid policy or standard.

Use of Company email for personal communications is prohibited. Orchid computers should not be used to check personal or home email.

It is also a violation of policy to use computers, electronic communications, electronic information, or the Internet to communicate confidential or sensitive information or trade secrets. Information stored in Orchid computers and file servers, including without limitation customer lists, vendor lists, and research data, is the property of the Company and may not be distributed outside the Company in any form whatsoever without the written permission of the Chief Human Resource Officer.

You may not forward or redirect email messages if doing so would lead to the disclosure of confidential business or client information to one or more people who are not authorized to have it. If you have any questions about whether a particular use is improper, ask your supervisor before engaging in the activity.

Telephones. When using Orchid telephone systems, all employees are required to present a professional image, including speaking with an appropriate tone at an appropriate volume. Personal calls may be made only when reasonably necessary and preferably during rest and meal breaks. If you must make a confidential personal call and desire privacy, speak to your supervisor. Long distance personal calls charged to Orchid are strictly prohibited.

Portable Electronic Devices. Orchid may provide employees with (or share the cost of) portable technology, including laptop computers, cell phones, etc. in order to support Company business.

While at work employees are expected to exercise the same discretion in using personal cellular phones and handhelds as is expected for the use of company phones. Excessive personal calls during the work day, regardless of the phone used, can interfere with employee productivity and be distracting to others. Employees should limit personal use to breaks and meal periods.

Cell phones and handhelds may not be allowed in certain areas of Orchid's sites. Employees are expected to follow the site rules.

If your job involves driving on behalf of Orchid, do not use your cell phone while behind the wheel and always observe all laws prohibiting "texting while driving." Orchid does not expect or permit you to respond to work-related issues using cell phones or electronic communications devices while you are driving. If you must otherwise communicate while driving, please pull over to the side of the road or find another safe place to stop the vehicle first.

Social Media. Social media is a powerful force in our culture and offers many benefits for companies who use it wisely. But with the advantages of social media come new challenges. While Orchid views social media positively, use of social media also presents certain risks and carries with it certain responsibilities. To assist you in making responsible decisions about your use of social media, we have established guidelines for appropriate social media use.

Orchid respects employee privacy and this policy does not apply to personal use of social media which is unconnected to our business. However, Orchid can and will respond to any unprotected employee conduct which adversely impacts the organization's reputation or legitimate business interests. When referencing Orchid or identifying yourself as an Orchid employee, always make it clear that your opinions are yours alone and that you are not speaking for or as Orchid. Also make certain that you

never make personal use of our logo or trademark and never disclose information which is confidential, proprietary or otherwise harmful to Orchid's legitimate business interests. Your social media postings should not violate any other applicable Company policy, including those set forth in this Handbook. You must never harass, threaten, defame or demean any other person or entity.

This policy is designed to protect the Company's legitimate business interests, while allowing you to engage in the use of social media as freely as possible. If you use social media for personal use, you are reminded that you are solely responsible for the content of any social media you create.

It is the Company's expectation that your observance of these guidelines will allow you to use social media in a positive, constructive and enjoyable manner. Should you violate this policy, however, you will be subject to discipline, up to and including termination.

PERSONAL BELONGINGS

For security reasons, employees should not leave personal belongings of value in the workplace. Terminated employees should remove any personal items at the time they leave Orchid. Personal items left in the workplace are subject to disposal if not claimed at the time of an employee's termination.

GUESTS AND VISITORS

Visits from friends and family are to be kept to a minimum, in order to preserve an appropriate work environment. It is extremely important that the impression left with Orchid visitors is that of a professional organization with the highest standards of conduct.

Children are prohibited in the work place (except on rare occasion with prior management approval). Children are never allowed on the manufacturing floor during business hours.

The Company reserves its right in its sole discretion to deny requests for workplace visitors or guests for reasons including, but not limited to, the requested guest or visitor has been disruptive in the past, there is a special event scheduled on the date(s) requested, or the work environment is not appropriate for the visitor or guest due to safety or other reasons.

HOUSEKEEPING

All employees are expected to keep their work areas clean and organized. People using common areas such as lunch rooms, locker rooms, and restrooms are expected to keep them sanitary. Please clean up after meals and dispose of trash properly.

PARKING

Employees may park their vehicles in designated areas, if space permits. If space is unavailable, employees must park in permissible public areas in the vicinity of Orchid property. Employees may not use parking areas specifically designated for customers, vendors, Company vehicles, or are reserved.

Orchid is not responsible for any loss or damage to employee vehicles or contents while parked on Company property.

SOLICITATION AND DISTRIBUTION

In order to ensure efficient operation of the Company's business and to prevent disruption to employees, we have established rules applicable to all employees governing solicitation and distribution of written material. All employees are expected to comply strictly with these rules. Any employee who is in doubt concerning the application of these rules should consult with their supervisor.

Solicitation by an employee of a fellow employee during the working time of either employee, on behalf of any individual, organization, employee, club or cause, is not permitted.

Distribution of any literature, pamphlet or other material to an employee during the working time of either employee, or at any time in any working area is not permitted.

"Working time" does not include an employee's scheduled break or lunch period, or just before or after a work shift.

Persons who are not employees may not solicit employees during working time or distribute literature for any purpose in any customer service area, working area, shopping area or any area restricted to employees only, unless authorized by the Chief Human Resource Officer. Unauthorized entry, solicitation, or distribution of materials on Orchid property is strictly prohibited. Please advise your supervisor if you observe any questionable or unauthorized solicitation or distribution taking place on Company property.

Note: The above prohibition does not apply to charitable solicitations or postings expressly authorized by the Company from time to time in keeping with its corporate values and belief in good citizenship, nor does it apply to purely personal solicitations by employees (such as requests for a roommate, finding a home for a puppy, selling a motorcycle, etc.). However, no employee may ask customers or suppliers for donations to charitable organizations by expressing or implying any significance to the business relationship with Orchid.

TOBACCO FREE

Orchid Orthopedic Solutions is committed to providing a healthy work environment for all employees. Given the documented risks associated with tobacco use and secondhand smoke, Orchid has determined that all interiors of Company owned or leased buildings and vehicles will be non-smoking and tobacco free.

- Smoking or use of any form of tobacco-related products or electronic cigarettes (e-cigarettes) by anyone, including visitors, is strictly prohibited within company owned or leased facilities or vehicles.

- Smoking is permitted only on breaks and at meal times.
- Employees may only smoke or use tobacco-related products or e-cigarettes in outdoor company designated areas.
- Employees with tobacco dependencies can seek treatment, and may refer to their Health Insurance Benefits booklets for more details on health coverage for such treatments and for information regarding our Employee Assistance Program.

Employees failing to comply with this policy will be subject to disciplinary action up to and including termination.

EMPLOYEE CONDUCT

CONDUCT AND ETHICS

Orchid expects each employee will use good judgment in governing personal conduct so as to promote a positive, orderly, efficient, and safe workplace. Since Orchid employees are representatives of the Company, personal conduct not only reflects upon the individual but also upon the image of the Company, co-workers and our mutual reputations.

Disregard or violation of any Company policy, practice, procedure, or standard is likely to result in discipline, up to and including termination of employment. Any disciplinary offense may result in disciplinary action, including informal counseling, formal reprimand, probation, suspension, a Performance Improvement Plan (“PIP”) or termination. The appropriateness of the penalty in any particular case will be determined by the Company based on its judgment as to the seriousness of the offense, the employee’s prior work record, extenuating facts and circumstances, and other relevant factors.

The Company also reserves the right to suspend employees for purposes of investigating an alleged disciplinary offense. If the Company takes no disciplinary action following such suspension, the employee will be compensated for the time off.

The following is a list of the kinds of conduct or performance issues that may subject an employee to discipline or termination. All rules apply while employees are at work or on Company premises. They also apply when employees are away from Company premises if such behavior harms the Company’s reputation or product, renders the employee unable to fully perform their duties, or leads to reasonable refusal, reluctance or inability of other employees to work with the offender. No list of rules, however extensive, can accommodate all possible employee actions, and the Company accordingly reserves the right to discipline or terminate employees for unlisted conduct that is similar in nature or impact to the cited examples.

- Violation of the Equal Employment Opportunity Policy
- Violation of the Anti-Harassment Policy
- Violation of the Drug and Alcohol Free Workplace Policy
- Violation of the Workplace Violence and Weapons Policy
- Failing or refusing to follow instructions, undermining supervisory authority or other insubordination
- Discourteous treatment of customers or visitors
- Misrepresentation of facts, falsifying any records or information, or dishonesty of any kind
- Punching another employee’s time card or allowing another employee to do the same for you
- Consuming or removing Company or employee goods or property without approval or proper payment
- Theft of any kind in any amount
- Disclosing confidential Company information, violation of the Social Security Number Privacy Policy, or any other misuse of confidential information.
- Abusing or destroying Company property or the property of others
- Conviction of a felony criminal offense or other job-related criminal activity
- Excessive absenteeism, tardiness or failure to timely call in absences or tardiness
- Failing to report personal injury, accident or defective equipment immediately

- Working another job while absent or on leave without reporting to the Company and obtaining authorization
- Making false and malicious statements concerning the Company or its products
- Sleeping on the job
- Unauthorized use or carrying of passengers in Company vehicles
- Unauthorized use of Company property, records, tools, or equipment
- Violating safety rules, failing to use safety devices or apparel, reckless or careless operation of vehicles, tools or equipment; failure to report a safety hazard
- Substandard quality or quantity of work or other poor performance
- Creating or contributing to unsanitary or unsafe conditions
- Horseplay
- Wasting materials or supplies
- Performing personal work on Company time
- Using abusive or profane language
- Eating or drinking at workstation without supervisor's approval
- Excessive time at rest periods; failure to be at your job and ready to work at the start of the shift
- Failing to attend scheduled meetings
- Failing to complete reports promptly and accurately
- Unprofessional appearance or unacceptable personal hygiene
- Failing to punch time card
- Improper use of Company telephones, computers, cell phones or other Company property or equipment
- Irregular attendance or lack of punctuality
- Violation of the Solicitation and Distribution Policy
- Smoking during unauthorized times or in unauthorized areas
- Unsafe driving when entering or leaving Company property; unauthorized parking
- Wasting of time or loitering during working hours
- Other offenses determined by the Company not to be in its best interest or the best interest of its employees, suppliers or customers

Orchid is committed to an environment where open, honest communications are the expectation, not the exception. At Orchid, everything we do is driven by our Core Values. That is why it is important that employees report unethical behavior through communicating with local management, Human Resources, or by contacting Orchid's Hotline Service at 1-855-792-6411 or through the website: www.orchid-ortho.ethicspoint.com. The hotline is confidential and accessible at all times.

ENTERTAINMENT/GIFTS

No employee may accept a gift or gratuity from any customer, vendor, supplier, or other person doing business with Orchid because doing so may give the appearance of influencing business decisions, transactions or service. Please discuss expenses paid by such persons for business entertainment, meals, or trips with the Company in advance. As a guide, any gift with a value of \$50.00 or greater should be reported to their immediate supervisor to determine the disposition of the gift.

CONDUCTING PERSONAL BUSINESS

Employees are to conduct only Orchid business while at work. Employees may not conduct personal business or business for another employer during their scheduled working hours.

CONFLICTS OF INTEREST

All employees must avoid situations involving actual or perceived conflicts of interest. Some situations that may present conflicts of interest are discussed below.

Outside Employment: To ensure against conflicts of interest and excessive job burdens, any employee who holds other employment (including self-employment or a business venture) is required to inform Orchid of that activity. Employees who hold outside jobs will be required to meet the same performance standards as other Orchid employees. If another position may interfere with or affect the employee's job performance or conflict with the interest of Orchid or a client, the employee may be required to choose whether the employee wishes to maintain the outside job or employment with Orchid.

Personal Investments: No employee may allow any investment to influence, or be susceptible to an interpretation that it could influence, their judgment or actions in the conduct of Orchid's business. All employees are required to disclose in writing to the Chief Human Resource Officer any proprietary or financial interest they may have in any organization with which the Company does business or with which it is in competition, so that a determination can be made as to whether a conflict of interest exists. (This policy does not restrict or require disclosure of any investment by any employee in a stock or other security of any corporation listed on a national securities exchange or regularly traded national securities dealers, provided that such investment does not exceed one percent of the market value of the outstanding securities of such corporation.)

No employee should represent Orchid in any transaction with any non-publicly owned enterprise in which there is a significant financial interest.

No employee or member of an employee's family may invest in any real estate of interest to Orchid or contiguous to any property owned or controlled by Orchid.

Political Activities: While employees are encouraged to take an active role in political activities on their own time. Any political activities may not include identifying Orchid.

Relationships: Personal or romantic involvement with a competitor, supplier, or subordinate employee of Orchid, which impairs an employee's ability to exercise good judgment on behalf of the Company, creates an actual or potential conflict of interest.

Supervisor-subordinate romantic or personal relationships also can lead to supervisory problems, possible claims of sexual harassment, and morale problems.

- An employee involved in any of the types of relationships or situations described in this policy should immediately and fully disclose the relevant circumstances to their immediate supervisor, or any other appropriate supervisor, for a determination about whether a potential or actual conflict exists.

- If an actual or potential conflict is determined, Orchid may take whatever corrective action appears appropriate according to the circumstances. Failure to disclose facts regarding any actual or potential conflict of interest shall constitute grounds for disciplinary action.

Any violation or event of suspected improper conduct should be reported to a supervisor/manager or Human Resources.

CUSTOMER RELATIONS

Employees are expected to be polite, courteous, prompt, and attentive to every customer. When an employee encounters an uncomfortable situation that the employee does not feel capable of handling, the general manager should be called immediately.

Ours is a service business and all of us must remember that the customer always comes first. Our customers ultimately pay all of our wages. Remember, while the customer is not always right, the customer is never wrong.

Customers are to be treated courteously and given proper attention at all times. Never regard a customer's question or concern as an interruption or an annoyance. The employee must respond to inquiries from customers, whether in person or by telephone, promptly and professionally.

Through conduct, show the desire to assist the customer in obtaining the help the employee needs. If the employee is unable to help a customer, find someone who can.

Never argue with a customer; if a problem develops or if a customer remains dissatisfied, ask a supervisor or the General Manager to intervene.

Entertainment and gifts for customers in excess of \$50.00 requires prior approval by your direct Manager.

MEDIA RELATIONS

The media (including newspapers, television, radio, the internet, blogs, social media, seminars/forums and magazines) are among the many ways our customers and business partners build their individual perceptions of Orchid. It is important to ensure that the information contained in all communication with stakeholders is consistent, accurate, fair and timely.

The Corporate Communications Team serves as Orchid's designated contact point for the news media and is the source of official information about the company and consists of the marketing department and the Chief Commercial Officer. The first point of contact is the Senior Director, Sales and Marketing. The second point of contact is the Chief Commercial Officer.

Positive and consistent media coverage is an integral element of the company's marketing plan. Ideas for articles or pieces that would positively portray the company or its work should be directed to the Corporate Communication Team. Employees who become aware of negative occurrences that are likely to rise to the level of a news story should promptly notify the Corporate Communications Team.

Employees are prohibited from initiating contact with or responding to any news media on behalf of Orchid before first contacting the Corporate Communications Team. Any employee speaking to the media without the consent of the Corporate Communications Team is speaking as a private citizen and not as a company representative. When public comment on behalf of Orchid is requested, an appropriate spokesperson will be identified by the corporate communications team based on their knowledge, experience and expertise.

Employees who are contacted directly by a representative from news media should follow these guidelines:

- Let the media representative know that Orchid's policy is to refer all media inquiries to the Corporate Communications Team
- Write down the representative's name, organization, and contact information
- Establish exactly what information the representative is seeking
- Establish the response timeline
- Provide the representative with contact information for the communications department
- Contact the communications team to let them know about the above information. The communications team will need your help to prepare a response.

Employees may discuss topics related to their areas of expertise once the employee has been approved as a spokesperson by the Corporate Communications Team.

News media are encouraged to first contact Orchid's Corporate Communications Team to facilitate visits. Access to manufacturing areas is strictly prohibited without prior authorization from the company. Media personnel who infringe upon, delay or conflict with Orchid's normal operations may be asked to leave the premises.

News media may show up unannounced at your facility. The site manager and employees should act with the same courtesy and professionalism as we use with customers. Contact the Corporate Communications Team immediately and provide any and all relevant information about the situation.

DRESS CODE AND OTHER PERSONAL STANDARDS

The Company believes that how its employee dress and present themselves is a reflection of both the employee and the Company. We desire to present a professional and positive image to all with whom we come in contact. Dress should be appropriate in accordance with the needs of the job.

The Company expects every employee to exercise good judgment in determining appropriate dress that is safe, in good taste for our business environment, and is considerate of fellow employees, customers, and visitors to the premises.

Each site will determine what is considered appropriate dress for the business environment.

When personal protective equipment, such as safety glasses, safety shoes or hard hats, is required by the Company in support of specific job functions or plant areas, that equipment must be worn when performing those job functions or when in those plant areas.

DRUG AND ALCOHOL FREE WORKPLACE

Orchid Orthopedic Solutions strives to provide a safe work environment for all employees, to ensure the reputation of the Company and its employees and to safeguard the assets of the Corporation. As part of that commitment, Orchid has established a drug and alcohol-free workplace policy.

The following violates this policy:

- Possession, use, manufacture, distribution, dispensation, diversion or transportation or sale of any illegal drug (or its metabolite) or any controlled substance without a prescription or beyond the scope of a prescription. Note: the term “illegal” includes any drug that is illegal under either state or federal law (this includes marijuana, even if the workplace is in a state that allows recreational and/or medical marijuana).
- Having a detectable level of any illegal drug in an employee’s system at any time.
- Using, possessing, storing or distributing alcohol while on duty.
- Being at work under the influence of or impaired by alcohol.
- Being at work impaired by any over-the-counter medication or any controlled substance, including prescription medication, such that an employee’s ability to perform their job functions is impacted.
- Using prescription drugs illegally (i.e., using drugs that have not been legally obtained or in a manner, amount or for a purpose other than as prescribed). An employee or job applicant can confidentially report the use or prescription or nonprescription medications to a medical review officer, both before and after a drug/alcohol test, by directly contacting the medical review officer
- Storing on Company premises alcohol or illegal drugs.
- Being convicted of using, selling or possessing controlled substances or any other violation of federal or state drug and alcohol laws.
- Refusing to consent to testing, refusing to submit a sample for testing, or switching or adulterating any sample for testing.

Violation of this policy will result in disciplinary action, up to and including termination of employment. However, Orchid may offer a “Last Chance Agreement” to employees with a minimum of six months of service. In that case, the employee must agree to a substance abuse test by completing the “Substance Abuse Testing Consent Form” and completing the “Last Chance Agreement” requirements, which will include a mandatory referral to the EAP (Employee Assistance Program) and completion of the EAP’s treatment plan as a condition of continued employment.

Testing. Orchid will require applicants and employees to be tested for drugs under the following circumstances:

- Pre-employment. All applicants who have been offered employment for positions requiring a drug test must undergo drug testing at a laboratory chosen by Orchid as a condition of employment. Any applicant with a confirmed test may be denied employment. Orchid will not discriminate against applicants for employment because of a past history of drug or alcohol abuse. It is the current illegal use of drugs that Orchid will not tolerate.
- Reasonable Suspicion. “Reasonable suspicion” is based on a belief that an employee is using or has used drugs or alcohol in violation of this policy and is based on specific, objective and articulable facts and reasonable inferences drawn from those facts in light of experience. Among other things, such facts and inferences may be based upon, but not limited to, the following:

- (A) Observable phenomena while at work such as direct observation of substance abuse or of the physical symptoms or manifestations of being impaired due to substance abuse.
- (B) Abnormal conduct or erratic behavior while at work or a significant deterioration in work performance.
- (C) A report of substance abuse provided by a reliable and credible source.
- (D) Evidence that an individual has tampered with any substance abuse test during employment.
- (E) Information that an employee has caused or contributed to an accident while at work.
- (F) Evidence that an employee has used, possessed, sold, solicited, or transferred drugs while working or while on the employer's premises or while operating the employer's vehicle, machinery, or equipment; or
- (G) Involvement in an accident which results in an injury to the employee or to another individual, or in damage to Orchid property.

The following drugs will be included in the drug test:

- Marijuana metabolites
- Cocaine metabolites
- Amphetamines
- Opiate metabolites
- Phencyclidine (PCP)

In addition, an employee may be tested for alcohol if the employee appears to be under the influence of or to have used alcohol while on duty. In addition, employees in safety-sensitive positions may be tested for alcohol under other circumstances.

Employees and job applicants who have a positive confirmed drug or alcohol test result may explain or contest the result to the medical review officer within five (5) working days after receiving written notification of the test result from the medical review officer. If an employee's or job applicant's explanation or challenge is unsatisfactory to the medical review officer, the medical review officer shall report a positive test result back to Orchid.

Treatment Resources

Employees with drug or alcohol dependencies should seek treatment, and may refer to their Health Insurance Benefits booklets for more details on health coverage for such treatments and for information regarding our Employee Assistance Program (EAP). The EAP provides confidential assessment, referral and short-term counseling for employees and their dependents who need or request it. No information regarding the nature of the personal problem will be made available to supervisors, nor will it be included in your permanent personnel file. It is the responsibility of an employee to seek assistance from EAP *before* alcohol and drug problems lead to disciplinary actions. Once a violation of this policy occurs, subsequently seeking treatment through an EAP on a voluntary basis will not necessarily lessen disciplinary action and may, in fact, have no bearing on the determination of appropriate disciplinary action.

Orchid's EAP will provide appropriate assessment, evaluation and counseling and/or referral for treatment of drug and/or alcohol abuse. Employees may be granted leave with a conditional return to work, contingent upon successful completion of the agreed-upon treatment regimen, which may include

follow-up testing. If an EAP referral to a treatment provider outside the EAP is necessary, costs may be covered by your medical insurance; but the costs of such outside services are your responsibility. Participation in the EAP will not affect your career advancement or employment, nor will it protect any employee from disciplinary action if substandard job performance continues.

Confidentiality

All information received by Orchid through this policy will be treated as strictly confidential.

EXPENSE REIMBURSEMENT

All expected travel should be pre-approved by the employee's supervisor, or the expenses may not be reimbursed. Employees will be reimbursed for all reasonable and necessary expenses incurred while traveling on approved company business. Employees should use their discretion and try to keep costs low whenever possible.

Employees must record all travel and business expenses on the Company's Expense Reimbursement Form and submit it to their supervisor. If business travel requires an employee to be out of the office for an extended period, the report must cover no less than one week and no more than one month of expenses.

Employees should include all 'itemized' receipts when submitting an Expense Reimbursement Form for reimbursements. When dining with customers, prospects, employees or vendors for legitimate business purposes, the receipt should include the names of all people included as well as the company name(s).

Employees must submit all Expense Reimbursement Forms with receipts to their supervisor no later than five business days after the last day of the trip. All employee reimbursements will be paid on the employee's next regular pay day.

If an employee has been issued a company credit card, the employee may use the credit card only for business expenses. The employee should submit receipts for all purchases made with the credit card. Use of the credit card for personal purchases is considered theft and grounds for immediate termination.

OFF-DUTY CONDUCT

While Orchid does not seek to interfere with the off-duty and personal conduct of its employees, certain types of off-duty conduct may interfere with the Company's legitimate business interests. For this reason, employees are expected to conduct their personal affairs in a manner that does not adversely affect the Company's or their own integrity, reputation or credibility. Off-duty conduct by an employee that directly conflicts with the Company's essential business interests and disrupts business operations will not be tolerated.

TIME AND ATTENDANCE

(Except Orchid Bridgeport - See Site Addendums)

This policy applies to non-exempt (hourly) employees of Orchid.

The importance of regular work attendance cannot be overemphasized. Good attendance is important to the smooth operation of every department and the success of Orchid Orthopedic Solutions.

Employees have an obligation to be at work and on time at the start of their scheduled work shifts. The Company recognizes that there may be times when employees must be away from work due to illness or for important personal reasons that cannot be avoided. However, excessive or chronic absenteeism impacts business operations and will result in corrective action, up to and including termination.

Employees who are unable to report to work as scheduled must contact Orchid as soon as possible (at minimum 30 minutes prior to the scheduled start time). The employee is personally responsible for following the local call-in or notification procedure for calling in and providing the nature of the absence. If the employee is incapacitated or unable make contact due to an emergency, a voice mail message may be left for the supervisor by an immediate family member, on behalf of the employee. In these instances, a message must also be left in Orchid's general voice mail or local call-in line (if available).

Should an absence from work extend beyond one full workday, the employee is required to call in daily to report their status until the employee is able to return to work unless a leave of absence has been approved. With approved leaves, the employee is not required to call in daily up to the date the leave is approved.

If the absence extends beyond the date through which the leave of absence is approved, the employee is responsible for notifying Orchid on or prior to the date of expected return and to again call in daily until a leave extension is approved. The No-Call, No-Show policy will apply should the employee fail to report their status after the leave has expired. Additionally, management will require a medical provider's release authorizing the return to work, if applicable.

TIME CLOCKING IN/CLOCKING OUT REQUIREMENTS

All non-exempt (hourly) employees will be issued a badge that will be used to clock in/out of the time system.

All non-exempt (hourly) employees will be provided training on how to use the time clock to accurately account for time worked. Employees not located at a manufacturing site or who work remotely will be provided training on how to track time using an online portal. Time badges are the employee's responsibility. Worn and/or damaged badges must be returned to Human Resources and will be replaced.

Supervisors/Managers will establish employee work schedules for each employee. Employees are not permitted to start work prior to the start of the assigned shift. There may be instances due to business need that Supervisors/Managers may approve a deviation from the standard work shift.

Employees are expected to clock in at or before the start of and the end of the assigned work shift. Employees cannot work "off the clock" (must be clocked in to be accurately paid). Supervisors/Managers will work with Human Resources to establish/communicate meal and rest break schedules.

Additionally, employees are also required to "clock out" for unpaid lunch (meal) breaks and to "clock in" when returning from unpaid lunch (meal) breaks, regardless if the lunch is taken on/off company property. Employees are NOT required to clock in/out for rest breaks.

Failure to clock in/out properly may impact the accuracy of the employee paycheck. If an employee neglects to clock in/out correctly, or inadvertently makes a mistake, the employee must immediately contact their Supervisor or Manager to ensure the prompt correction of the time record.

Employees are only to clock in/out for themselves. Employees are not to ask other employees to clock in/out for other employees. Clocking in/out for another employee is categorized as falsification of time records, a violation of policy, subject to employment termination.

In an emergency, the company will need to account for all employees in the facility. **Employees must always clock out whenever leaving company premises.** This practice is critical to ensuring that all employees can be accounted for.

TIME CLOCK ROUNDING (FOR PAYROLL CALCULATIONS only)

The time clocks have been programmed to round to the quarter hour with a 7-minute breakpoint. Because of this, employees should clock-in no more than 7 minutes prior to the start of the shift and no later than 7 minutes after the shift start time. Clock-out should be no earlier than the shift end time and within 7-minutes after the shift end time.

See examples below for employees whose shift is 8:00 a.m. – 4:30 p.m. (with a 30-minute unpaid lunch): **(7-minute breakpoint)**

Check-In Time (Scheduled Start time is 8:00AM)	Rounds To	Check-Out Time (Scheduled End time is 4:30PM)	Rounds To
7:50AM	7:45AM	4:20PM	4:15PM
7:53AM	8:00AM	4:23PM	4:30PM
7:56AM	8:00AM	4:25PM	4:30PM
7:58AM	8:00AM	4:30PM	4:30PM
8:07AM	8:00AM	4:37PM	4:30PM
8:08AM	8:15AM	4:38PM	4:45PM

Time Clock Rounding only applies to calculation of time for payroll purposes. Rounding does NOT apply when calculating Tardy or Absences (reference Attendance).

In accordance with state and federal regulations, time records must be retained documenting all hours worked by non-exempt (hourly paid) employees, including overtime. Timecards or other record keeping methods (timeclocks) are being used for this purpose.

ATTENDANCE

A point-system is used for tracking absence and attendance. This point system has been programmed into Workday, along with each employees' work schedule to enable Workday to track absenteeism (absence and tardy).

Definitions for Key Terms referenced in the Attendance policy.

Absence: Missing 30 minutes or more of a scheduled work shift. This includes arriving late or leaving before the end of the scheduled shift.

Tardy: Missing up to 29 minutes of a scheduled work shift. Includes arriving late after the start of the scheduled shift OR leaving early, departing before the end of the scheduled shift in a workday.

Absences will be recorded as Excused or Unexcused: Excused Absences:

With the appropriate approval (*if applicable), the following are considered **Excused Absences**:

- Approved PTO
- Personal/Paid Sick Time (Detroit, Lansing, Arcadia, & Santa Ana only)
- Flexible PTO and No-Fault Time (Bridgeport, Chelsea, & Oregon only)
- Bereavement Leave
- Approved Leaves: FMLA, Military, Disability, Personal, etc.
- Jury Duty*
- Business Scheduled Downtime: Plant shutdown, furlough, no work available, etc.
- Absence/Tardiness due to inclement weather or “Acts of God” (to be determined by Senior Management)

Excused Unpaid Absence:

In order to qualify as an **Excused Unpaid**, the following will apply:

- All available paid time off must be used prior to requesting unpaid time off.
- Managers must provide advance PRE-APPROVAL (refer to Site Handbook Addendum). There may be times when absence requests may be denied in order to support business conditions, customer demands or other situations.
- Requests that are not PRE-APPROVED in advance (refer to Site Handbook Addendum) must be approved by the most senior member manager of the department.
- Employees who have not completed the 90-day introductory period are not eligible for Excused Unpaid Absences.

Under certain circumstances, a formal request for a Personal Leave of Absence may be required. Personal leaves are subject to manager and Human Resources approval.

Unexcused Absences:

Any absence not listed under the “excused” categories will be considered **Unexcused Absences**. Unexcused absences will accumulate points. Should an employee earn an excessive number of points, performance management activity will occur as detailed in **the Point System section**.

No-Call, No-Show Policy: Any employee absent three (3) consecutive days without notice to their supervisor or manager will be considered as having voluntarily quit employment with the company. Reference: No-Call, No-Show policy in the Orchid Employee Handbook.

Points have been assigned to each type of **unexcused absence** and/or **tardy**.

Absences protected by state or federal law do not count as a violation of this policy.

POINT SYSTEM: DEFINITION OF POINTS ASSIGNED FOR EACH TYPE OF ABSENCE/TARDY

POINTS	DESCRIPTION
0.5	Each instance of work tardiness or leaving before the end of scheduled shift (1 – 29 minutes)
1	Each instance of work absence or leaving before the end of scheduled shift (30 –59 minutes)
2	Each instance of work absence or leaving before the end of schedule shift (1 or more hours)
3	Full shift absence.
5	No Call/No Show (cannot be covered by protected time)
	Employee is late four (4) hours or more AND fails to notify Supervisor on the date of the absence will be recorded as a No Call/No Show

For clarification: A medical provider's excuse does not exempt an employee from being assigned points for the absence. Exception: Approved protected medical leave: Reference Excused Absences.

Employee Responsibility: (Accumulated points are displayed when clocking in/out of the time system)

The employee is responsible for being aware of the number of points that they have accumulated, along with the consequences associated with the point values.

Employee Supervisor Responsibility:

On a weekly basis, it is the responsibility of the employee's immediate Supervisor to monitor attendance and document time records properly.

The employee's Supervisor is responsible for maintaining current attendance information and connecting with Human Resources to coordination of performance actions once specific point thresholds are met.

The employee's Supervisors is expected to notify employees when the employee reaches specific point thresholds to provide the employee an opportunity to modify/correct the behavior to avoid performance actions, up to and including termination.

No Grace Period for Tardy(s)

There is no grace period when determining tardy(s). An employee must clock in on or before the start of the assigned shift to prevent being charged a tardy.

For example: Shift starts at 7:00 a.m., employee should clock in at between 6:53 a.m. – 7:00 a.m.:

- Should employee clock-in at 7:01 a.m., 0.5 points will be assigned for that tardy.

Consolidation of Consecutive Day Absences

Once each calendar year, should an employee have an absence of up to 3 consecutive calendar days, the employee is able to consolidate the consecutive days absence and have it categorized as one event.

For example: *Employee is out August 1 - 3: this absence will be counted as 1 (Full Shift) absence.*

- *3 points will be assigned for that incident.*

POINT REMOVAL

Points are accumulated over a rolling 12-month period. Any points beyond 365 calendar days will be removed and are not counted in the point total.

For Example: *If an employee receives one (1) point on 09/01/2020, on 09/01/2021, that point will be excluded from the point balance total.*

PERFORMANCE ACTIONS ASSOCIATED WITH EXCESS TARDY(S) or ABSENCES

Performance actions will start once when an employee reaches specific levels of points in a rolling 12-month period. See details below:

POINTS	PERFORMANCE ACTION *
5	Verbal Discussion: At 5 points, a verbal discussion takes place.
8	Written notice to employee: An employee reaching eight (8) or more points during a 12-month rolling period is subject to a written warning.
12	Final Written Warning: When an employee reaches 12 points, the employee will be given a final written warning.
15 or more	Employee is subject to termination

**Performance Actions will be documented in the employee personnel file*

MEDICAL DOCUMENTATION TO SUPPORT AN ABSENCE OR TARDY

An employee who is absent from work due to their own illness for three (3) or more consecutive days may be required to present a physician's release to return to work prior to beginning work. **NOTE: A medical provider's excuse does not exempt an employee from being assigned points for the absence.**

Prior to the employee's return to work, should there be medical restrictions, accommodation requests must be reviewed and approved by Human Resources prior to returning to work. Requests for work accommodations will be made on a case-by-case basis.

PAY POLICIES, WORKING HOURS AND SCHEDULES

PAY PERIODS AND PAYMENTS

For pay purposes, the work week begins on Sunday morning at 12:01 a.m. and ends on Saturday night at midnight. Orchid's pay schedule is bi-weekly on Fridays. If a payday falls on a holiday, generally pay will be available one day early.

If there is an error in your pay, you should report this immediately. In accordance with state or local law, either a new check correcting the error will be issued, or the error will be corrected by an adjustment on a later pay.

ADVANCES

Orchid does not permit advances against pay or against PTO.

CALL-IN/REPORTING TO WORK PAY

There may be isolated situations where a non-exempt employee reports to work when no work is available but was not provided advance notice to not report or when an employee is called into work outside of their regular shift. Non-exempt employees called in to work or who show up for work when no work is available will be compensated in accordance with this policy.

Non-exempt employees reporting for work when no work is available in the absence of proper notification not to report will be paid two (2) hours pay or per state law, whichever is greater.

Proper notification not to report will be deemed to have been given when one of the following events takes place:

- Announcements are made over local radio stations prior to the shift to preclude the employee leaving for work, typically 30 minutes or more before scheduled start time.
- A telephone call or text message is made to the last employee provided number 30 minutes or more before scheduled start time.
- An email is sent to the last employee provided email address 30 minutes or more before scheduled start time.

Employees who do not have a working contact telephone number or email address listed in the Human Resources Department, for either direct contact or messages, may be denied payment under this policy at the discretion of Human Resources.

Shutdowns caused by natural causes or other circumstances beyond the Company's power to control such as fire, flood, hurricane and tornado are not covered under this policy, and therefore Show-Up Pay will not be provided. Interruption of work because of the failure of any or all public utilities is considered a circumstance beyond the Company's power to control.

Non-exempt employees called for emergency purposes or during non-scheduled hours will be paid for all hours worked, or at least two (2) hours, whichever is greater. Applicable overtime will also apply.

MEAL AND REST PERIODS

Because positions within the Company require attentiveness to detail, safety and quality, the Company recognizes the need for employees to be able to take a break from their normal duties. Meal periods and rest breaks will be established by each site.

OVERTIME FOR NON-EXEMPT EMPLOYEES

Non-exempt employees are not permitted to work overtime without supervisory approval. Orchid will pay all non-exempt employees' overtime in accordance with applicable federal and state laws. Overtime compensation (time and a half) will be paid to all nonexempt employees who work more than 40 hours during the normal workweek. Hours paid but not actually worked (for example, holidays, PTO, etc.) do not count for purposes of calculating overtime entitlement.

SHIFT PREMIUM

Shift premium is a component of compensation. As such, each site will determine what if any shift premium will be offered to non-exempt (hourly) employees.

If Shift Premium is offered by the site, it will be calculated and paid only for the hours the employee has worked and will exclude hours paid but not actually worked (for example, holidays, PTO, etc.).

TRAVEL TIME FOR NON-EXEMPT EMPLOYEES

Certain non-exempt positions are required to travel in the United States and abroad.

Employees in positions classified as non-exempt under the Fair Labor Standards Act are eligible for compensation for the time they spend traveling.

Compensable Travel Time

- Normal commute time to and from work is not paid time.
- If an employee is required to work at a site other than their usual work location for one day, compensable travel time includes the time the employee departs from their residence and arrives at their work site, minus normal residence to work commute time.
- If an employee is traveling by air, then travel between the employee's residence and the airport is considered travel time, but only if it is further than the employee's ordinary commute.
- Any portion of authorized travel time that takes place within or outside of normal work hours on any day of the week, including Saturday and Sunday, is treated as work hours. Travel time will be paid at the employee's regular hourly rate and will be factored into overtime calculations.
- When an employee travels between two or more time zones, the time zone associated with the point of departure should be used to determine work hours for the day of departure.

Calculating and Reporting Travel Time

- Employees are responsible for accurately tracking, calculating and reporting travel time on their time sheets in accordance with this policy.
- Meal periods should be deducted from all travel time.
- Travel itineraries should be approved prior to booking travel arrangements.

WORK SCHEDULES

Orchid Orthopedic Solutions maintains work hours which are compatible with state law, departmental functions, and the maintenance of effective work schedules. The normal work week for non-exempt full-time employees is 40 hours per week. The normal work schedule for exempt full-time employees shall average at least 40 hours per week.

- Every employee is obligated to report for each and every scheduled working day or shift, to report on time and to complete all scheduled hours.
- Each site shall establish each employee's work week and work schedule as operational needs demand. The Company reserves the right to change shifts or an employee's shift based on business needs.
- Non-exempt employees may be asked to work longer than their scheduled hours. The supervisor will give as much advance notice as possible.
- Non-exempt employees may not begin working before their normal starting time, work through the designated lunch period or other unpaid breaks, or continue working after normal end time without first getting a supervisor's approval.
- It is the responsibility of the employee to arrive and report to work at the beginning of their scheduled work day. The employee is expected to remain on the job until the end of their scheduled work day or until released by employee's supervisor.

Employees are not to clock in earlier than nor after work shifts established by each site without prior approval.

IMPROPER PAY DEDUCTIONS AND PAYMENT MISTAKES

It is Orchid policy that no improper deductions are made from any employee's pay, including any deduction that might affect an employee's exempt status. If you think your paycheck contains a mistake, or that there is an incorrect or improper deduction, inform Human Resources immediately. Any pay error or improper deduction will be promptly corrected, and steps will be taken to ensure future compliance.

SAFETY AND HEALTH

ENVIRONMENTAL HEALTH AND SAFETY

Orchid is committed to protecting its employees, property, contractors, visitors and the environment from harm and loss. Orchid will provide and maintain a healthy and safe work environment by exercising accepted good industry practices, and by compliance with established rules and regulations. Orchid will constantly strive to identify and eliminate any hazards or substandard conditions, which could cause illness or injuries, as well as fires, security losses or damage to company property, assets or the environment.

All employees, whatever their position, are expected to exercise their responsibility to report to their immediate supervisor any hazard or substandard condition immediately, so that corrective actions can be taken. Managers and employees are expected to support and participate in the Company's Environmental Health and Safety program and perform their functions in accordance with established procedures and training. Contractors, sub-contractors and visitors must also comply with policies and procedures applicable to the facility where their work is being performed. Orchid can achieve and maintain good health and safety through positive management and active participation by all.

FRAGRANCE POLICY

The Company reserves the right to prohibit employees from wearing fragranced items in the workplace, including cologne, after shave lotion, perfume, perfumed hand lotion, hair products, deodorants, etc. when coworkers or customers experience sensitivity to the products.

RECREATIONAL ACTIVITIES AND PROGRAMS

Orchid or its insurer will not be liable for payment of workers' compensation benefits for any injury that arises out of an employee's voluntary participation in any recreational, social, or athletic activity that is not part of the employee's work-related duties.

SECURITY

Orchid has developed guidelines to help maintain a secure workplace. Be aware of persons loitering for no apparent reason in parking areas, walkways, entrances and exits, and service areas. Report any suspicious persons or activities to management. Secure the desk or office at the end of the day. When called away from the work area for an extended length of time, do not leave valuable and/or personal articles in or around the workstation that may be accessible. The security of facilities as well as the welfare of our employees depends upon the alertness and sensitivity of every individual to potential security risks. A supervisor should immediately be notified when unknown persons are acting in a suspicious manner in or around the facilities, or when keys, security passes, or identification badges are missing.

VEHICLE SAFETY AND USAGE

Vehicles used for Company business (Company, rental, and personal vehicles) are to be driven by authorized employees only. All authorized employees must have a valid driver's license.

Any authorized employee who has a driver's license revoked or suspended shall immediately notify Human Resources by the next business day and immediately discontinue operation of the vehicle if driving on Company business.

All accidents while driving on Company business, regardless of severity, must be reported immediately to the police and to Human Resources.

- If other vehicles are involved: record the name and address of the driver; license plate number; make, model and year of vehicle; and insurance company name and policy number.
- Contact Human Resources to complete the required reporting.
- All stolen vehicles must be reported immediately to the police and to Human Resources.
- Damage to employee owned personal vehicles as well as injury to non-employee passengers are not covered by corporate insurance coverage and therefore are the sole responsibility of the employee.
- The mileage reimbursement provided by the Company includes depreciation, fuel, maintenance, and insurance.
- All ticket violations are the responsibility of the employee.
- Driving on Company business while under the influence of intoxicants or other drugs that could impair driving ability is prohibited.
- The driver and any passenger(s) must always wear a seat belt.
- Traffic laws are to be obeyed.
- Drivers are not to transport hitchhikers, flammable items, firearms, or other hazardous materials.

Prohibited Use of Company Cell Phone While Driving

In the interest of the safety of our employees and other drivers, Orchid employees are prohibited from using cell phones (including all smart phones) while driving on Company business and/or Company time.

If the job requires the employee to keep a cell phone turned on while driving, a hands-free device must be operated. The Company recommends preprogramming frequently used numbers into the phone rather than looking up numbers before dialing them.

Writing, sending, or reading text-based communication - including text messaging, instant messaging, e-mail, web browsing and use of smart phone applications - on any wireless device or cell phone while driving is also prohibited under this policy unless the device is specifically designed and configured to allow voice-operated and hands-free operation to dictate, send, or listen, and it is used in that manner while driving.

Any violation of this policy will result in discipline or termination, up to and including termination of employment. Behavior prohibited by this policy may also violate state law.

WORKPLACE VIOLENCE

Orchid is committed to providing a safe work environment for all employees and guests at our facilities. The Company encourages and fosters appropriate conduct among our employees and an atmosphere of respect for the health and safety of others.

Employees are encouraged to bring their disputes or differences with other employees to the attention of management before the situation escalates into potential violence. Orchid wishes to assist in the resolution of employee disputes and will not discipline employees for raising legitimate complaints or concerns.

However, the Company wishes to be clear that it has zero tolerance for any threatening, intimidating, harassing or coercive behavior, whether overt or implied, as well as any improper, harmful or offensive physical contact initiated by an employee. Without exception, acts and threats of violence are not permitted. All such acts and threats, even those made in apparent jest, will be taken seriously, and will lead to disciplinary action up to and including termination of employment.

Orchid likewise prohibits the possession/use of weapons on company time or property, including weapons that may be stored in any vehicles that come onto company premises. The policy also applies at all times and in all places when an employee is on company business. This policy applies whether or not the person is licensed to carry the weapon, concealed or otherwise.

It is every employee's responsibility to assist in establishing and maintaining a violence-free work environment. If you experience or witness any conduct that violates this policy, whether by an employee or by a customer, vendor, solicitor or member of the public, please report it to your supervisor or any member of management immediately. Any employee who violates this policy will be subject to immediate termination.

TERMINATION

EMPLOYEE REFERENCES

All requests for references must be directed to Human Resources. No other manager, supervisor, or employee is authorized to release references for current or former employees.

By policy, Orchid discloses only the dates of employment and the title of the last position held of former employees. If the employee authorizes the disclosure in writing, Orchid also will inform prospective employers of the amount of salary or wage last earned.

Subpoenas relating to employee's records issued by a court of law, or an attorney having authority to issue such subpoena, will be honored.

INVOLUNTARY TERMINATIONS

In order for the Company to implement strategic plans and meet its goals and objectives, it is essential that all managers set high standards of organizational performance. This includes overall organization effectiveness as well as employee performance.

The maintenance of acceptable levels of organization performance may involve the termination of employees from time to time. When these actions take place, it is important that they are properly reviewed and handled in a consistent manner throughout the Company.

The following types of terminations are classified as involuntary:

- Furlough due to lack of work expected to last longer than 60 days (RIF).
- Reorganization resulting in elimination of position.
- Termination due to unsatisfactory job performance.
- Termination due to violation of policy.
- Termination at the discretion of the Company.
- Inability to return from medical leave.

All Company-owned property, including vehicles, keys, uniforms, identification badges, and credit cards, must be returned immediately upon termination of employment.

If at the time of termination, an employee has an outstanding debt to the Company (example: tuition reimbursement), this amount may be taken from the final pay in accordance with state law. The employee is expected to repay any outstanding amounts.

The employee will receive final payment as required by state law.

Unused PTO balances will be paid as required by state law and according to Orchid policy.

VOLUNTARY RESIGNATION

Voluntary resignation results when an employee voluntarily quits employment at Orchid, or fails to report to work for three consecutively scheduled workdays without notice to, or approval by, the employee's supervisor.

In order to ensure that the Company has sufficient resources in place to meet business needs, the Company expectation is that employees provide a minimum of two weeks' notice of voluntary termination and to provide such notice in writing. PTO may not be taken during the two week notice period without supervisor approval.

The following types of terminations are considered as being voluntary:

- Resignation
- Retirement
- Three (3) consecutive days - no call/no show
- Refusal to accept work assignments
- Refusal to return to work after a leave or furlough

The Company reserves the right to make any resignation effective immediately.

If at the time of termination, an employee has an outstanding debt to the Company (example: tuition reimbursement), this amount may be taken from the final pay in accordance with state law. The employee is expected to repay any outstanding amounts.

The employee will receive final payment as required by state law.

Unused PTO balances will be paid as required by state law and according to Orchid policy.

All Company-owned property, including vehicles, keys, uniforms, identification badges, and credit cards, must be returned immediately upon termination of employment.

ORCHID EMPLOYEE HANDBOOK ADDENDUM

Equal Employment Opportunity Policy for US Employees

41 CFR Section 60- 741.44(a);-300.44(a)

Rev: July 2022

It is the policy of ORCHID to:

1. Recruit, hire, train and promote, into all job classifications, the most qualified persons without regard to race, color, national origin, sex, sexual orientation, gender identity, religion, age, status as a protected veteran or an individual with a disability, or any other protected group status or non- job related characteristic as directed by law.
2. Make employment and promotional decisions by utilizing reasonable standards based on the individual's qualifications as they relate to a particular job vacancy, in accordance with equal employment opportunity requirements.
3. Administer all personnel actions relating to the terms, conditions, and privileges in a nondiscriminatory manner.

Such action shall include, but not be limited to the following: employment, upgrading, demotion, transfer, recruitment or recruitment advertising; layoff or termination; rates of pay or other forms of compensation; and selection for training, including apprenticeship.

Jessica Stout, Senior Manager, Talent Management & Talent Acquisition, is the designated EEO Coordinator for Orchid. The EEO Coordinator's responsibility is to implement and to monitor adherence to this policy. Employees should feel free to contact the EEO Coordinator should they experience any problems. The CHRO is responsible for the administration of this Policy.

Any employees or applicants with questions or concerns about any type of discrimination in the workplace are responsible to bring these issues to the attention of their immediate supervisor, management, HR partner or the EEO Coordinator. Consistent with the Reporting Without Fear of Retaliation and Reporting procedure in our One Orchid Anti-Discrimination, Anti-Harassment and Anti-Bullying Policies, employees and applicants can raise concerns and make reports without fear of reprisal, harassment, intimidation, threats, coercion, or discrimination because they: (1) file a complaint with ORCHID or with federal, state, or local agencies; (2) assist or participate in any investigation, compliance review, hearing, or any other activity related to the administration of any federal, state, or local equal employment opportunity or affirmative action statute; (3) oppose any act or practice made unlawful by federal, state, or local law requiring equal employment opportunity or affirmative action; or (4) exercise any other employment right protected by federal, state, or local law or its implementing regulations.

I personally make my commitment to all of the objectives of equal employment opportunity and expect the cooperation and participation of all employees of the Company in achieving these objectives.

7/11/2022

Date



Nate Folkert, Chief Executive Office

SITE-SPECIFIC HANDBOOK ADDENDUMS

Orchid sites may have site-specific Handbook Addendums.

Employees have access to these Addendums from Orchid computers from the following folder:

"Y:\Orchid Employee Handbook\Site Specific Handbook Addendums"

EMPLOYEE ACKNOWLEDGMENT AND AGREEMENT

1. I acknowledge that I have electronic access to the Orchid (the “Company”) Employee Handbook, including its Addendums. I understand that my employment with the Company is subject to the terms of the Handbook and its Addendums.
2. I acknowledge that I am an at-will Employee as described in the Handbook. I understand that no one is authorized to modify the terms of the Handbook or make any agreement that is different from the terms of the Handbook, except by (1) a written agreement signed by the President of the Company, or (2) the Company’s authorized publication of a revised edition of this Handbook.
3. I agree that all records, papers, information, documents, and software to which I may have access in the course of my employment (whether with respect to the Company, its customers, third parties or otherwise) are confidential, or considered trade secrets, and I will treat them as strictly confidential during and after my employment. When my employment ends, or when requested by the Company, I will return all Company property in my possession, including any records, papers, information, documents, and software owned by the Company or containing confidential information (whether with respect to the Company, its customers, third parties or otherwise). Confidential information or trade secrets includes, but is not limited to information about operational costs, profits, markets, sales, products, employees, pricing policies or strategies, operational methods, or other business information that is not made available or accessible to the general public. I will not, during or after my employment, disclose to any person or organization any confidential information that I acquired in the course of my employment with the Company (whether with respect to the Company, its customers, third parties or otherwise), and I will not use such information for the benefit of any person or organization other than in the proper performance of my job duties on behalf of the Company.
4. I recognize that any breach or threatened breach of my agreement to maintain the confidentiality of Company or customer information or trade secrets (whether with respect to the Company, its customers, third parties or otherwise), may result in irreparable harm to Company. Due to the difficulty of ascertaining damages, the Company shall be entitled to injunctive relief against any such actual or threatened breach without the requirement of a bond, in addition to any other legal remedy. The Company’s right to an injunction shall not alter or prohibit the Company’s right to recover monetary damages, including attorney fees, in the event I have breached, or attempted to breach, my obligations to protect Company or customer information or trade secrets (whether with respect to the Company, its customers, third parties or otherwise).
5. The rights and obligations provided in this agreement shall be in addition to any other rights and obligations provided under law or other signed, written agreement with the Company. This agreement will be interpreted in compliance with the “Defend Trade Secrets Act of 2016,” and will provide protection from criminal or civil liability for a disclosure of a trade secret or confidential information that is made in confidence to a federal, state, or local government official, or to an attorney, when such disclosure was made for the purpose of reporting or

investigating a suspected violation of law; or made in a complaint or document filed in a lawsuit or other proceeding, if such filing is made under seal to maintain confidentiality.

6. I consent that the Company may monitor and/or record conversations or other communications on Company equipment for purposes of quality assurance, billing compliance, or Employee training, or whenever the Company reasonably suspects that the equipment is being or has been used for inappropriate purposes or activity.

7. I authorize the Company to deduct from my final payment (or from any other amounts that may be due me, including but not limited to bonuses and payment of unused paid time benefits, when my employment with the Company ends) any amounts that I may owe to the Company. Amounts that could be due to the Company may include the replacement cost of unreturned equipment, including a laptop computer, unapproved or personal expenses on Company credit card, loans, advances of wages, benefits paid to me by the Company that I had not earned or accrued, unpaid insurance premiums, and/or other debts or obligations. I freely and fully consent to such deductions for my own benefit, and I understand that whether or not I agree to this deduction will not impact my employment status with Orchid.

Date: _____, 202__

Employee's Signature

Employee Name Printed