

CIVICPLUS[®]

Making Government Work Better

Policies & Procedures

2025 - 2026



CivicPlus Policy and Procedures Human Resources

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ANTI-CORRUPTION & ANTI-BRIBERY POLICY	

1. PURPOSE

The purpose of this policy (this “Policy”) is to provide clear guidance for compliance with all applicable anti-corruption and anti-bribery laws and to encourage and provide guidance for reporting of any suspected violations. CivicPlus is committed to operating in an ethical manner in and prohibits all forms of Corruption and Bribery.

2. WHO IS COVERED BY THIS POLICY?

This policy applies to all employees working at all levels of CivicPlus (“Employees”), wherever located, with respect to their activities for or on behalf of CivicPlus or otherwise in connection with CivicPlus activities, including directors, officers, managers, interns, and any third party working on CivicPlus’ behalf (“Third Party”). It is essential that each Employee understands and complies with this Policy during the course of their employment or engagement with CivicPlus.

As noted herein, because anti-bribery laws prohibit indirect as well as direct offers and payments, CivicPlus and any Employee engaging in unlawful conduct or conduct in violation of this policy may be held liable for the conduct of Third Parties such as CivicPlus’ agents and business partners when there is knowledge or reasonably should have been knowledge of the unlawful conduct. Turning a “blind eye” or ignoring “red flags” that something may be wrong does not exonerate an Employee or CivicPlus from liability. Authorizing a Third Party to do something that an Employee cannot do directly is a violation of this Policy.

3. POLICY

Employees of CivicPlus must abide by all applicable Anti-Corruption and Anti-Bribery Laws, present in United States Federal law, including but not limited to 18 USC § 201 and the Foreign Corrupt Practices Act (“the FCPA”), local laws in every state, county, and municipality in which CivicPlus does business in, and all statutes which prohibit the payment of money or Bribes or giving items of any meaningful value to public officials (both U.S. and non-U.S. officials) in order to obtain, or retain, business; facilitate payment; secure an improper advantage; or to improperly influence the actions of that official (the “Applicable Laws”).

This Policy establishes principles that will govern Employee conduct to: a) conform to the Applicable Laws, and similar applicable anti-corruption laws worldwide and b) more broadly, reinforce CivicPlus’ intention and obligation to act honestly and ethically in all our business dealings. All Employees and Third Parties are prohibited from engaging in any acts of Corruption or Bribery, either directly or through a third party. CivicPlus does not offer or accept any Bribes or kickbacks, nor does it tolerate Corruption, in any form, in connection with its course of business. Simply put – an Employee shall not ever offer, accept, solicit, facilitate, or provide a bribe of any kind, in the form of a monetary payment or gift, to anybody, at any time, or for any reason, to solicit, obtain or keep business or to secure an improper advantage for CivicPlus. Such conduct is illegal and can subject the Employee engaging in such behavior, as well as

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CivicPlus, to both civil and criminal punishment. Employees will not be punished for refusing to provide a Bribe to secure a deal, even if this results in a loss of business for CivicPlus. If presented with such an opportunity, or the Employee is unsure whether a payment or gift would constitute a bribe, such Employee should contact the CivicPlus Legal Department and Human Resources immediately. All interactions with Government Officials must comply with this Policy, the CivicPlus' Code of Ethics and all applicable laws, rules, and regulations. All such interactions must adhere to the CivicPlus' commitment to act in compliance with the highest ethical standards and to conduct business honestly and legally, and Employees and Third Parties should not create the appearance of impropriety regardless of whether there was any improper intent.

4. CHARITABLE GIVING

From time to time, CivicPlus may make charitable donations in the form of in-kind services, knowledge, time, or direct financial contributions. Charitable contributions are acceptable, provided:

- The request for a donation is made in writing and sufficiently describes the charitable purpose of the donation, any business reason for the donation, and all details about the recipient;
- The donation is legal and ethical under local laws and practices;
- Proper due diligence is performed to ensure that the recipient is a bona fide charitable organization;
- The donation will not be provided in exchange for a business benefit or advantage;
- Based on the size of the charitable donation, it is reviewed and approved in writing by the CivicPlus Enterprise Risk Management Committee in advance;
- It is accurately recorded in CivicPlus' books and records.

5. POLITICAL CONTRIBUTIONS

No political contribution shall be made, directly or indirectly, with CivicPlus funds or assets, regardless of whether the contributions are legal under applicable law other than a political contribution specifically approved in writing by the CivicPlus Enterprise Risk Management Committee.

6. REPORTING

Employees and Third Parties have an affirmative obligation to prevent, detect, and report Corruption and Bribery. Any Employee who has information, upon reasonable belief or suspicion, that this Policy or any Corruption or Bribery laws may have been violated, will be violated in the future, or believes they are being asked to pay or accept a Bribe or otherwise act against this Policy, should immediately report this event to the CivicPlus Legal Department and Human Resources. Managers overseeing Employees in positions that deal directly with Public Officials shall be responsible and held accountable for reporting any Employee behavior that a manager knows, or reasonably should have known, violates this Policy. All reports shall be treated as confidentially as possible. However, Employees are encouraged to provide their personal information when submitting these reports. There shall be no retaliation for reports made in

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good faith – even if the report was a mistake. However, knowingly reporting false information shall result in disciplinary action. Anyone who reports a suspected violation may be subject to disciplinary action to the extent they violated any policy or procedure or participated in the behavior being reported. If an Employee is unsure whether an act constitutes Corruption or Bribery, or violates this Policy, or has other questions or concerns, such Employee should raise their concerns with the CivicPlus Legal Department and/or Human Resources.

Alternatively, if an Employee wishes to report such matters anonymously, they may submit a description of the concern or complaint to the attention of the CivicPlus Legal Department and/or Human Resources by mail to: 302 S 4th Street, STE 500, Manhattan, KS 66502 or by e-mail to: legal@civicplus.com, HR@civicplus.com or they can make an anonymous report through the [CivicPlus Anonymous Reporting Form](#).

CivicPlus will not tolerate any form of discrimination, harassment or retaliation against any person who raises a concern in good faith or refused to participate in conduct that would violate law or this Policy. All reports will be investigated and appropriately addressed. CivicPlus will attempt to keep its discussions with any person reporting a violation or concern confidential to the extent reasonably possible.

7. VIOLATIONS

Violations of relevant laws can result in severe civil and criminal penalties, as well as reputational harm to CivicPlus and its employees. Employees who violate these laws may also be subject to civil and criminal penalties, including imprisonment. An employee’s failure to comply with any provision of this Policy is a serious violation of this Policy and may result in disciplinary actions by CivicPlus, including up to termination of employment, as well as civil or criminal charges. Employment with CivicPlus is on an at-will basis, and CivicPlus is free to terminate the employment relationship with its employees at any time for any or no reason, consistent with applicable law.

8. DEFINITIONS

A “Public Official” broadly means **any** elected government official. It also includes any person who is paid with government funds or serves in a public function. Anyone working for a local, state/provincial, or national government or organization, public international organization, as well as all employees of public schools, hospitals, and state-owned enterprises – regardless of their title or position.

A “Bribe” is offering or giving anything of value (financial or non-financial) to any person, directly or indirectly, to improperly influence that person in the performance of a duty or for the purpose of obtaining or retaining business, or securing an improper business advantage. Anything of value includes cash, gift cards, gifts, meals, travel, entertainment, business opportunities, jobs, favorable contracts, and donations. Bribes can also include something of value in exchange for providing information, a discount, or favor, to a third party; as well as facilitating payments, which are used to speed up the performance of routine government actions, or kickbacks, which occur when a buying person is offered a return of an

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items purchase price from the seller to induce the buying person to purchase or improperly influence future purchases.

“Corruption” is the abuse of entrusted power for personal gain. Bribery and fraud are considered corrupt practices. A “Government Official” may include anyone, regardless of rank or title, who is:

- An officer or employee of any local, provincial, or national government, including government agencies (for example, police officers, firefighters, members of the military, clerks, etc.);
- A director, officer, representative, agent or employee of any government-owned or controlled business or company;
- Any person with the responsibility to allocate or influence expenditures of government funds, including persons serving in unpaid, honorary, or advisory positions;
- Any person acting in an official capacity or on behalf of any government or public international organization (for example, an official advisor or legal representative to a government);
- Any officer or employee of a political party;
- Any candidate for political office; and
- A close relative (for example, parent, sibling, spouse, or child) of any of the above.

An “Improper Advantage” can have a wide variety of meanings, including: obtaining, retaining, or renewing a contract; obtaining licenses or regulatory approval; preventing a detrimental action by state or government authority; obtaining a competitor’s bid information; influencing a court or arbitration decision; avoiding or reducing customs duties, taxes, or fines.

9. GIFT EXCEPTIONS

Exempted from this policy are gifts of nominal value specifically provided by CivicPlus such as t-shirts, pens, and any other items that are given out by CivicPlus at events including conferences, training events, seminars, or trade shows, that are available to all members of the public attending the event. Furthermore, any food, beverages, gift baskets, thank you cards, or moderately priced meals that are supplied to current customers, partners, or vendors in the interest of building positive business relationships are permissible. If an Employee is unsure whether a gift would fall under these exceptions, such Employee should contact the CivicPlus Legal Department and Human Resources immediately.

10. MANAGEMENT AND REVIEW OF THIS POLICY

CivicPlus will provide training to all Employees on a regular basis to assist them in understanding and complying with this Policy and to inform them of changes to the Policy. Employees must participate in and complete the offered training when required to do so.

The CivicPlus Legal Department and Human Resources Department will facilitate reporting and communication from Employees to the CivicPlus Enterprise Risk Committee to ensure all reports of violation of this Policy are appropriately reviewed and assessed.

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The CivicPlus Enterprise Risk Management Committee oversees the assessment of Corruption and Bribery risks across the enterprise, as well as evaluating controls, consulting, and reporting to senior management and the Board of Managers regarding Anti-Corruption & Anti-Bribery risks and is the final authority for this policy.

Through the CivicPlus Enterprise Risk Management Committee, CivicPlus will undertake a high level, company-wide bribery, and other financial crime risk assessment regularly and if specific circumstances require, such as a material change to CivicPlus’ geographic or business coverage.

The results of the analyses/interviews found during the risk assessment will be documented and retained for record keeping purposes.

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ANTI-HARRASSMENT, WORKPLACE BULLYING, NON-RETALIATION POLICY, COMPLAINT PROCEDURE

1. ANTI-HARRASSMENT POLICY

Sexual and other unlawful harassment is a violation of Title VII of the Civil Rights Act of 1964 (Title VII), as amended. CivicPlus also strictly prohibits any harassment based on a characteristic protected by law, such as race, color, ancestry, national origin, gender, sex, sexual orientation, gender identity, marital status, religion, age, disability, genetic information, veteran status or other characteristic protected by state or federal law.

It is CivicPlus' policy to provide a work environment free of sexual and other harassment. Harassment of CivicPlus employees by management, supervisors, coworkers, or non-employees who are in the workplace is absolutely prohibited. Further, any retaliation against an individual who has reported sexual or other harassment or retaliation against individuals or who has participated in an investigation of a harassment complaint is similarly unlawful and will not be tolerated. CivicPlus will take all steps necessary to prevent and eliminate unlawful harassment. Regular training will take place to ensure all new hires and existing employees understand our expectations of a harassment-free workplace.

Definition of Unlawful Harassment

"Unlawful harassment" is conduct that has the purpose or effect of creating an intimidating, hostile, or offensive work environment based on the characteristics identified above; has the purpose or effect of substantially and unreasonably interfering with an individual's work performance; or otherwise adversely affects an individual's employment opportunities because of the individual's membership in a protected class.

Unlawful harassment includes, but is not limited to, epithets; slurs; jokes; pranks; innuendo; comments; written or graphic material; stereotyping; or other threatening, hostile, or intimidating acts based on race, color, ancestry, national origin, gender, sex, sexual orientation, marital status, religion, age, disability, veteran status, or other characteristic protected by state or federal law.

While the classifications below are not defined as unlawful, inappropriate comments and behaviors pertaining to these classifications are not appropriate and will not be tolerated during work hours and work events:

- Physical characteristics such as height and weight
- Political affiliation
- Citizenship status
- Status in regard to public assistance
- Breastfeeding
- Reproductive health decision making

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Definition of Sexual Harassment

“Sexual harassment” is generally defined under both state and federal law as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature where:

- Submission to or rejection of such conduct is made either explicitly or implicitly a term or condition of any individual’s employment or as a basis for employment decisions; *or*
- Such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile, or offensive work environment.

Other sexually oriented conduct, whether intended or not, that is unwelcome and has the effect of creating a work environment that is hostile, offensive, intimidating, or humiliating to workers may also constitute sexual harassment.

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

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

All employees should take special note that, as stated above, retaliation against an individual who has filed a report of sexual harassment and retaliation against individuals for cooperating with an investigation of a sexual harassment report is unlawful and will not be tolerated at CivicPlus.

Reporting Procedure

Any employee who believes he or she has been subject to or witnessed illegal discrimination, including sexual or other forms of unlawful harassment, is requested and encouraged to report it as soon as

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possible. You may first, but are not required to, address the objectionable behavior with the person you feel is discriminating against or harassing you. You may file a complaint directly to your immediate supervisor or department manager, Human Resources, or any other member of management with whom you feel comfortable bringing such a complaint. Similarly, if you observe acts of discrimination toward or harassment of another employee, you are requested and encouraged to report this to one of the individuals listed above.

All reports will be investigated promptly and, to the extent possible, with regard for confidentiality. When CivicPlus receives allegations of misconduct, it will conduct a fair, timely, and thorough investigation that provides all parties with appropriate due process and reaches reasonable conclusions based on the evidence collected. If the investigation confirms conduct contrary to this policy has occurred, CivicPlus will take immediate, appropriate corrective action, including discipline, up to and including immediate termination. Corrective action will also be enforced against supervisory and managerial personnel who knowingly allow such behavior to continue.

Prevention is the best way to eliminate harassment in the workplace. All new employees, managers and supervisors will receive information on harassment prevention, as well as a copy of this policy when they are hired and will receive ongoing training throughout their employment.

State and Federal Remedies

In addition to the above, if you believe you have been subjected to sexual harassment, you may file a formal complaint with the United States Equal Employment Opportunity Commission (EEOC) or your local state agency that handles such claims. Using our complaint process does not prohibit you from filing a complaint with these agencies.

2. WORKPLACE BULLYING POLICY

The purpose of this policy is to communicate to all employees, including supervisors, managers and executives, that CivicPlus will not in any instance tolerate bullying behavior. Employees found in violation of this policy will be disciplined, up to and including termination.

Definition

CivicPlus defines bullying as repeated, health-harming mistreatment of one or more people by one or more perpetrators. It is abusive conduct that includes:

- Threatening, humiliating or intimidating behaviors.
- Work interference/sabotage that prevents work from getting done.
- Verbal abuse.

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Such behavior violates CivicPlus' Culture and Core Values.

Examples

CivicPlus considers the following types of behavior examples of bullying:

- Verbal bullying: Slandering, ridiculing or maligning a person or his or her family; persistent name-calling that is hurtful, insulting or humiliating; using a person as the butt of jokes; abusive and offensive remarks
- Physical bullying: Pushing, shoving, kicking, poking, tripping, assault or threat of physical assault, damage to a person's work area or property
- Gesture bullying: Nonverbal gestures that can convey threatening messages
- Exclusion: Socially or physically excluding or disregarding a person in work-related activities

In addition, the following examples may constitute or contribute to evidence of bullying in the workplace:

- Persistent singling out of one person
- Shouting or raising one's voice at an individual in public or in private
- Using obscene or intimidating gestures
- Not allowing the person to speak or express himself or herself (i.e., ignoring or interrupting)
- Personal insults and use of offensive nicknames
- Public humiliation in any form
- Constant criticism on matters unrelated or minimally related to the person's job performance or description
- Public reprimands
- Repeatedly accusing someone of errors that cannot be documented
- Deliberately interfering with mail and other communications
- Spreading rumors and gossip regarding individuals
- Encouraging others to disregard a supervisor's instructions
- Manipulating the ability of someone to do his or her work (e.g., overloading, underloading, withholding information, setting deadlines that cannot be met, giving deliberately ambiguous instructions)
- Assigning menial tasks not in keeping with the normal responsibilities of the job
- Taking credit for another person's ideas
- Refusing reasonable requests for leave in the absence of work-related reasons not to grant leave
- Deliberately excluding an individual or isolating him or her from work-related activities, such as meetings
- Unwanted physical contact, physical abuse or threats of abuse to an individual or an individual's property (defacing or marking up property)

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Individuals who feel they have experienced bullying should report this to their supervisor and/or to [Human Resources](#) before the conduct becomes severe or pervasive. All employees are strongly encouraged to report any bullying conduct they experience or witness as soon as possible to allow CivicPlus to take appropriate action.

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BONUS AND COMMISSION POLICY	

At CivicPlus, we strive to reward employees whenever possible to recognize their contributions towards success. The following policy outlines the eligibility, payment, and distribution of three types of payments at CivicPlus:

- I. [Bonuses](#)
- II. [Commissions](#)
- III. [Leader Performance-Based Bonus](#)

1. BONUSES

1.1 Discretionary Bonuses

Discretionary bonuses are determined at the company's sole discretion as a special and immediate recognition and reward for exceptional performance that is well beyond normal or regular work responsibilities. There is no guarantee or promise to pay employees a discretionary bonus.

For a bonus to qualify as discretionary, the manager must retain discretion regarding the amount and payment of the bonus until no more than five (5) days prior to payment. The bonus payment must be determined by the manager without prior promise or agreement and the employee has no contract right, express or implied, to any amount. The manager cannot set an expectation to the employees that a bonus will be paid if certain standards or goals are met. Managers must not communicate any discretionary bonuses intentions or commitments to their employees without prior review and confirmation by HR.

1.2 Non-Discretionary Bonuses

Nondiscretionary bonuses are promised or announced to eligible employees and guaranteed to those who meet established criteria as outlined in a bonus plan document. Bonus plan documents are owned by the Human Resources team.

1.3 Eligibility

For an employee to be eligible for a bonus:

- Employees must be in active employment status (full or part time) with CivicPlus when the discretionary bonus is awarded.
- An employee must have received no disciplinary actions in the past six months, including verbal warnings.
- An employee may not be rewarded twice for the same contribution.

1.4 Payment

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A discretionary bonus must be made as a one-time payment. Managers must consult with an HR Business Partner when considering a discretionary bonus for employees to ensure compliance with applicable laws and regulations. The criteria should be consistently and fairly applied when awarding a discretionary bonus to avoid the perception of favoritism and inequity.

Discretionary bonus criteria should still be applied when payment is awarded by gift card, and gift card bonuses shall be considered taxable income and must comply with all applicable IRS regulations. A nondiscretionary bonus should be paid based on the criteria outlined in the bonus plan document.

All bonuses are subject to taxation under applicable local, state, and federal taxes.

1.4.1 Overtime Pay Calculations

Under the Fair Labor Standards Act (FLSA), discretionary bonuses are not included in overtime pay calculations and nondiscretionary bonuses must be included in overtime pay calculations. Our company will follow its legal obligations.

1.4.2 Submitting a Bonus to Payroll

To submit a bonus for payment, please follow the [One-Time Payment](#) process via Payroll. Per the process, all submitted bonuses need to show proof of approval by the next-level approver. If you have questions, submit a ticket to payroll@civicplus.com.

2. COMMISSIONS

CivicPlus pays commissions based on the net value of the sale. Commission rates and required quota will be given to each eligible new employee at time of hire. CivicPlus reserves the right to change commission rates and quota requirements as needed to protect the financial integrity of the company or to serve any other business interest.

2.1 Eligibility

Employees eligible for commissions are provided with their commission plan at the time of employment and renewed annually. Please refer to the commission plan document for more details.

2.2 Earning a Commission

A commission is earned upon sale of a product or service, and only if the product or service is not cancelled.

2.3 Payment

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Commissions are paid on eligible product fees the following month of the sale being processed on the 2nd issued paycheck of the month. The advanced commission is calculated on the net value of a sale to the Company and does not include reimbursed travel expenses. Commissions are subject to taxation under applicable local, state, and federal taxes.

2.3.1 Early Contract Termination

Should terms of the original agreement adjust by cancellation of product or service within the first 12 months after the agreement has been fully executed, the company may reverse commissions originally paid to the employee for the associated sale in a fair and equitable manner.

- All cancellations will include the opportunity for the original sales representative to discuss the change request with the client prior to any adjustments being applied.
- Any claw backs will be reviewed on a case-by-case basis and in accordance with local, state and federal regulations.
- Deductions will only be made on the 2nd issued paycheck of the month and payment options will be considered when the deduction amount is more than earned advances in the same pay period.
- By participating in the commission plan, employees acknowledge and agree that the company may recover commission reversals through payroll deductions or other lawful means, consistent with applicable state and federal law. Where required by law, CivicPlus will obtain separate written authorization before any deduction is made.

3. LEADER PERFORMANCE-BASED BONUS

At CivicPlus, leader performance-based bonuses are offered to eligible employees. By accepting employment or continuing to work at CivicPlus, eligible leaders acknowledge their understanding and agreement with this policy.

3.1 Eligibility

This policy is applicable to those CivicPlus employees who are accountable for the successful management of one or more departments and oversee direct reports.

Performance Metrics

Bonuses are based on performance metrics achieved during the fiscal year. These metrics are determined annually and aligned with the company's strategic goals and objectives. Metrics may include, but are not limited to:

- Financial performance
- Operational excellence
- Leadership and team development
- Strategic project outcomes
- Other key performance indicators

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3.3 Bonus Calculation

The bonus amount will be calculated based on the performance metrics achieved during the fiscal year. The formula for calculating the bonus will be determined by the Leadership Team and communicated to eligible leaders at the beginning of the fiscal year. Our current bonus structure is outlined below:

Position	Bonus Percentage
Director and Sr. Director	15%
Vice President	20%
Senior Vice President	25%

The structure above may be subject to change and will be communicated accordingly. Exceptions to this process may be approved on a case-by-case basis.

3.4 Payment

Bonuses are based on the performance metrics achieved during the fiscal year and paid annually no later than March 31st after the fiscal year-end. All bonuses are subject to taxation under applicable local, state, and federal taxes.

3.5 Discretionary Element

This bonus is a discretionary payment, and the company reserves the right to adjust or withhold the bonus based on individual performance, conduct, or any other factors deemed relevant by the company. The decision of the Compensation Committee or the Board of Directors is final. There is no guarantee or contractual right to a bonus payment.

3.6 Prorated Bonuses

For newly appointed leaders or those who have been promoted during the fiscal year, the bonus may be prorated based on their time in the role and the achievement of performance metrics during their tenure.

3.7 Dispute Resolution

All disputes regarding this policy or any modification of it will be decided by the CFO and respective C-Level and VP of the respective department, who may consult Legal and/or HR as appropriate. Disputes must be made in writing within 30 days of payout and sent to the Vice President of the department and Vice President of Human Resources. All decisions are final and not subject to further internal review..

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4. TERMINATION

Employees who leave the Company or transfer to a different role within CivicPlus shall be:

- Entitled to commissions owed that were fully executed on or before the employee's last day.
- Employees are ineligible for any unpaid bonus if they do not meet the full bonus period requirements or are not actively employed on the bonus payout date, unless otherwise required by law or approved in writing by executive leadership.

5. CONCLUSION

This policy will be reviewed periodically to ensure its effectiveness and alignment with the company. We may modify this policy at any time without notice. If you have any questions, please reach out to hr@civicplus.com.

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BUSINESS TOOLS, EMAIL, & INTERNET ACCEPTABLE USE POLICY

1. PURPOSE

CivicPlus provides employees with approved business tools. Employees may have access to and may be approved to use any of the following business tools examples: computers, laptops, peripheral equipment, telecommunications, internet connectivity and other related technologies as part of their everyday work to conduct job functions. This policy is in place to help guide employees on how to utilize these tools. This policy shall be constructed and managed in accordance with acceptable guidelines defined by CivicPlus and executive leadership stakeholders.

2. DEFINITION OVERVIEW

Any business-owned system, network, environment, process, workflow, or software. Technology scope can include but not be limited to a physical/virtual device and/or applications procured by CivicPlus.

3. BUSINESS TOOLS, COMMUNICATIONS AND TECHNOLOGY USAGE

Any equipment, software, or technology supplied by CivicPlus for employee use is intended for business purposes. This encompasses applications and services, including business connectivity. Employees' access to company business tools is not protected by privacy and no employee should have any expectation of privacy regarding usage of corporate technology.

All employees are expected to use company business tools for business reasons. Any abuse or misuse of company business tools is subject to CivicPlus' full range of disciplinary action up to and including termination. Employees may occasionally use business tools for personal reasons provided that such use is kept to a minimum, does not interfere with employee productivity, does not undermine or hinder business objectives or operations and is not used to view, access, post, share or distribute illicit and/or inappropriate material or content, whether visual, textual, or audible.

Employees should not deliberately use business tools to impair or overload the performance of CivicPlus infrastructure, nor should one try to circumvent any system processes intended to protect the security of any user(s) or organization systems.

All employees should use company-approved software and only in accordance with the software license agreements. CivicPlus licenses the use of various software from different outside vendors and adheres to those terms and conditions from vendors. The use or distribution of unauthorized software is prohibited.

Technology applications and protocols that inhibit network or resource availability or present security and licensing concerns are prohibited. These include torrents (peer-to-peer sharing), excessive audio/video streaming and video games.

Employees may perform business work on telecommunication devices. The usage of mobile devices

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to view and perform corporate business shall be authorized within reasonable scope of the job position responsibilities. Employees using telecommunication devices or mobile devices, if personal or corporate managed, shall agree to the best of the ability, adhere to CivicPlus defined policies and protect sensitive and proprietary information when using such equipment.

Contact information, internet messages and telecommunications content are not protected by privacy and can be monitored by CivicPlus for quality and security purposes.

4. DATA SECURITY AND TECHNOLOGY OPERATIONS

Employees shall agree to the best of their ability, to adhere to CivicPlus defined policies and protect sensitive and proprietary information while using company equipment or personal devices to conduct CivicPlus business operations.

CivicPlus prohibits the use of account sharing across other individuals or departments. Authentication and identification of all organizational accounts must be compliant with NIST defined policies.

Vendors, contractors, and service providers conducting business with CivicPlus must adhere to and follow such guidelines to meet compliance requirements outlined by CivicPlus Executive Leadership, Information Security, and Information Technology.

Proprietary information data, software or corporate infrastructure should not be modified without the approval of appropriate department stakeholders as determined by management.

CivicPlus utilizes various tools for performing diagnostics, remote support, audit logging, device management, and resource connectivity with the goal of protecting and securing company data, equipment, and technology operations. Removal or disabling of these tools from a company device or platform is prohibited and may be considered a violation of company policy.

Storage of employee personal information data (i.e., photographs, videos, files, etc.) is not authorized and subject to deletion. CivicPlus holds no responsibility for retrieval of such personal data under any circumstances.

5. EMAIL AND INTERNET ACCEPTABLE USE

Company email and internet access (Headquarters or Satellite Offices) are business tools and should be used for business reasons. This Acceptable Use Policy (AUP) covers an overview of email and internet use in the workplace and while working remotely for CivicPlus using CivicPlus network and infrastructure systems.

Employee's network connectivity and its use are not private, and no employee should have any expectation of privacy regarding use. CivicPlus monitors network and security traffic during random

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times. Security features and policies may filter out websites with illicit and/or inappropriate material, content, unauthorized connections, etc.

Occasional personal usage at work or through remote access does not violate this policy provided that such personal use is kept to a minimum, does not interfere with employee productivity, does not undermine or hinder business objectives or operations, and is not used to access or conduct unauthorized operations. Internet access and connectivity should not be used to view, access, post, share or distribute such material that is a direct violation of acceptable use.

Employees shall agree to refrain from certain activities that negatively impact company infrastructure and connectivity. Any personal use should be kept to an absolute minimum due to the technological capacity of networks and resources. Employees should not deliberately use internet connectivity to negatively impact the performance of any corporate infrastructure, nor should one try to circumvent any system intended to protect the security of any user(s).

Use of CivicPlus' technology applications and platforms by an employee indicates the employee understands the AUP and agrees to abide by it. Any misuse or abuse of corporate technology and its defined policies are subject to CivicPlus' full range of disciplinary action up to and including termination.

6. RETURN OF EQUIPMENT AND INFORMATION

At the conclusion of employment at CivicPlus, employees must return the equipment to the company in good working condition, subject to normal ordinary wear and tear. CivicPlus provides multiple options for shipment returns with FedEx and UPS logistics. Failure to return equipment and information in the agreed upon timeframe is subjected to legal actions defined by CivicPlus.

7. TERMS OF USE

These Terms of Use ("TOU") govern your use of all business tools provided by CivicPlus.

- Your use of business tools must adhere to CivicPlus' existing policies including, but not limited to, the applicable [Terms of Use](#), [Core Values](#), and [Code of Ethics](#) (the "CivicPlus Policies"). It is your responsibility to understand and apply the CivicPlus Policies to your use of business tools. Any violation of the CivicPlus Policies or the TOU may result in disciplinary action, up to and including immediate termination of employment.
- Employees are expected to communicate respectfully, responsibly and in accordance with CivicPlus Policies. Any content that violates these guidelines will be subject to removal.
- Employees are encouraged to self-moderate the channels that they belong to, and to report any violations of the CivicPlus Policies or the Slack User Terms to Slack administrators or other appropriate individuals (e.g., HR (Human Resources), your manager).

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- Use your best judgement when considering posting content that may incite, be off-topic, questionable, inflammatory, or objectionable.
- When in doubt, remember good practice when using CivicPlus communication and technology platforms. Whether you are in an office or working remotely, our standards remain the same. It is crucial to uphold professionalism and respect in all our interactions for the benefit of every team member, regardless of their location.
- For those staff working in offices or shared workspaces, be respectful of nearby coworkers who may be communicating with others via phone or meeting applications. Use of headsets or other devices to limit sound carrying is recommended. Computer speakers and mics without a headset should be used respectfully.
- CivicPlus fully reserves its rights and obligations of a private workplace and follows a strict content removal policy. If any complaints are received about content posted on any business tools, we reserve the right to immediately remove such content, without due process or notice. CivicPlus shall not act as an arbiter in any disputes regarding content posted to business tools.
- Upon receiving a complaint, the content will be taken down immediately. No further due process or investigation process will be conducted. This is a strict policy, and no exceptions will be made.
- CivicPlus shall not tolerate violations of the CivicPlus Policies or the User Terms on any business tools. There is no room for interpretations or freedom of speech within CivicPlus. Content deemed inappropriate, in violation of CivicPlus Policies or the User Terms or made the subject of a complaint will be taken down upon receipt of a complaint.
- There is no expectation of privacy for the CivicPlus business tools users. All content may be subject to search and review by CivicPlus administrators if necessary.
- Any equipment, software, and proprietary information furnished by CivicPlus are for exclusive use as defined by job role and responsibilities.
- Immediately notify CivicPlus of the loss or compromise of any company provided confidential information, hardware, or software.
- Use best practice to safeguard information data, hardware, software, and other relevant technology areas, consistent with this document policy requirements and definitions.
- All intellectual property and corporate equipment requested by CivicPlus for evaluation and/or return shall be processed in accordance with this document policy requirements and definitions.

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- Ensuring the proper care safeguarding of all corporate equipment, technology and information data provided by CivicPlus.
- Acknowledgement of company policy and legal guidelines that apply to the failure of returning of corporate equipment and information data could be considered a violation and may result in further legal action by CivicPlus.
- Responsibility of best practice to not share unauthorized copies of confidential information data, software licenses, non-approved modifications of company infrastructure, unless directly authorized by CivicPlus.

By using CivicPlus' business tools, you acknowledge and agree to these terms. Any violation may result in disciplinary action, including termination of access. CivicPlus may remove any content posted on CivicPlus business tools, at any time, in its sole discretion.

Notwithstanding the foregoing, CivicPlus is committed to compliance with all applicable laws and the policy set forth herein may be altered for such compliance, in CivicPlus' sole discretion.

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CODE OF ETHICS	

1. PURPOSE

CivicPlus has a rich culture built on the core value of trust. This Code of Ethics (“Code”) is designed to assist all employees with aligning their actions and decisions with all of CivicPlus’ core values as we pursue CivicPlus’ mission and vision. It is intended to help us recognize ethical and compliance issues before they arise and to deal appropriately with those issues that do occur. All CivicPlus employees, officers, and directors must conduct themselves accordingly and seek to avoid even the appearance of improper behavior. We each have an individual responsibility to live up to the highest ethical standards of business conduct.

Although CivicPlus’ guiding principles cannot address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct.

MISISON

We make government work better.

VISION

To empower municipal leaders to transform interactions between the public and government into consistently positive experiences that elevate resident satisfaction, increase revenue, and streamline operations.

CORE VALUES

- **Impactful** – Passionately strive to bring our company vision to life
- **Team Player** – Commitment to work as one to achieve a common goal
- **Trustworthy** – Be honest, respectful, and reliable
- **Innovative** – Approach situations with a creative mindset to solve problems and discover a new path forward
- **Balanced** – Aspire to be our best selves by pursuing "work-life" and "work-laugh" harmony

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. If any employee is concerned whether the standards are being met or are aware of violations of the Code, such CivicPlus employee should inform their manager, contact the [Human Resources](#) department, [Legal](#) department, or submit an anonymous tip via the [CivicPlus Anonymous Reporting Form](#) (collectively and individually referred to herein as “Providing Notice”).

CivicPlus takes the standards set forth in this Code seriously and encourages and expects all CivicPlus employees to follow the guidelines set by this Code.

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2. CODE OF CONDUCT

We Do the Right Thing

- CivicPlus employees are always expected to do the right thing and have the courage to tackle the tough decisions and make the right choices in all areas.
- We seek competitive advantages through superior performance—never through unethical or illegal business practices. Stealing proprietary information, possessing trade secret information that was obtained without the owner’s consent, or inducing such disclosures by past or present employees of other companies is prohibited.
- Each employee, officer and director should endeavor to respect the rights of and deal fairly with CivicPlus’ customers, partners, service providers, competitors and employees.
- No employee, officer or director is permitted to engage in price fixing, bid rigging, or similar illegal activities.
- Employees, officers and directors must not share confidential business information with our competitors and must not engage in any conduct that could unreasonably restrict our competitors' access to the market
- We must endeavor to do what we say we will do in all instances inside our control and strive to make assurances only within the scope of our control.
- Employees can evaluate “the right thing” by asking:
 - Does what I am doing comply with the CivicPlus guiding principles, Code of Conduct, and policies?
 - Have I been asked to misrepresent information or materially deviate from normal procedure?
 - Would I feel comfortable describing my decision at a staff meeting?
 - How would my decision look if it made headlines?
 - Am I being loyal to my family, my company, and myself?
 - Is this the right thing to do?
 - Will this build trust and credibility for CivicPlus?
 - Will it help create a working environment in which CivicPlus can succeed over the long term?
 - Is the commitment I am making one I can follow through with?

We Are Good Employees & Good Citizens

- All CivicPlus employees are always representatives of our organization and should behave as such.
- All employees, officers, and directors must respect and obey the laws, rules, and regulations of

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the cities, states, and countries in which we operate. Although employees, officers, and directors are not expected to know the details of each of these laws, rules, and regulations, it is important to know enough to determine when to seek advice from supervisors, managers, or other appropriate personnel. If you are uncertain about any law, rule, or regulation, you should contact your supervisor or the CivicPlus legal department.

- Each employee of CivicPlus must comply with the Rules of Behavior applicable to their role and products.

We Have Respect for One Another

- Everyone at CivicPlus is expected to maintain an environment where we are treated with dignity and respect.
- CivicPlus is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types and from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident immediately to Human Resources.
- CivicPlus believes that all people should be treated with dignity. Any conduct that fails to show appropriate respect to others including fellow employees, customers, vendors and suppliers violates CivicPlus' values.

We Protect Our Organization from Conflicts of Interest

- All CivicPlus employees are expected to abide by the [CivicPlus Conflict of Interest Policy](#).
- CivicPlus employees should avoid any relationship or activity that might impair (or appear to impair) their ability to make objective and fair decisions when performing their jobs.
- We must never use CivicPlus property or information for personal gain or take for ourselves any opportunity that is discovered through our position with CivicPlus.
- CivicPlus employees are expected to avoid and/or appropriately handle possible conflicts of interest including but not limited to:
 - Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with CivicPlus.
 - Hiring or supervising family members or closely related persons.
 - To avoid accusation of favoritism, abuse of authority and sexual harassment, supervisors, managers and directors must not date their direct reports. This restriction extends to every manager above an employee.
 - Owning or having a substantial interest in a competitor, supplier or contractor.
- We protect our confidential, proprietary information and never disclose confidential, non-public information without a valid business purpose and proper authorization. *Please see the [Confidentiality Policy](#) for more details.*

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- It is the responsibility of each of us to use discretion in handling CivicPlus information so that we do not inadvertently reveal confidential information to competitors, vendors, suppliers, friends, and/or family members.

We Hold Ourselves & Others Accountable

- Employees, officers and directors are responsible for understanding the legal and policy requirements that apply to their jobs and are encouraged to report any suspected violations of law, this Code, or any CivicPlus policy by Providing Notice and to cooperate with any resulting investigations as needed. Employees can submit an anonymous tip via the [CivicPlus Anonymous Reporting Form](#).
- CivicPlus requires honest, accurate and timely recording and reporting of information in order to make responsible business decisions.
- Management and Human Resources are expected to investigate alleged violations with confidentiality to the maximum extent consistent with fair and rigorous enforcement of this policy. In addition to investigations, the Management and Human Resources team will ensure that fair and appropriate disciplinary action is taken as needed.
- Management is expected to demonstrate the importance of this Code through their actions and must be responsible for promptly addressing ethical questions or concerns raised by employees. They must take the appropriate steps to deal with such issues and encourage the ethics dialogue to become a natural part of daily work.
- All employees involved in questions or ethics are expected to act with integrity and cooperation and maintain an environment free from adverse action or retribution of any kind. Such adverse action or retribution will not be tolerated.
- Employees, officers and directors are expected to perform their CivicPlus related work in a safe manner, in alignment with [CivicPlus' Drug-Free Workplace / Drug & Alcohol Testing Policy](#). The use of illegal drugs in the workplace will not be tolerated.

Reporting and No Retaliation

All employees, officers and directors have the responsibility to Provide Notice of observed or suspected violations of law, this Code and any activity that might constitute financial fraud or financial misconduct. We must all work to ensure prompt and consistent action against violations. However, not all situations are clear-cut. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem. These are the steps to keep in mind:

- (a) Make sure you have all the facts. In order to reach the right solutions, we must be as fully informed as possible.

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- (b) Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.
- (c) Discuss the problem with your supervisor. This is the basic guidance for all situations. In many cases, your supervisor will be more knowledgeable about the question and will appreciate being brought into the decision-making process. Remember that it is your supervisor's responsibility to help solve problems. If you are uncomfortable discussing the problem with your supervisor, you can talk to Human Resources.
- (d) Seek help from CivicPlus resources. In a case where it may not be appropriate to discuss an issue with your supervisor or local management, contact the Human Resources department at HR@civicplus.com, the Legal department at legal@civicplus.com, or you can make an anonymous report through the [CivicPlus Anonymous Reporting Form](#).
- (e) You may report violations in confidence and without fear of retaliation. If your situation requires that your identity be kept secret, your anonymity will be protected. **CivicPlus does not permit retaliation of any kind against employees, officers, or directors for good faith reports of suspected violations.**
- (f) Always ask first, act later: If you are unsure of what to do in any situation, seek guidance before you act.
- (g) All employees, officers and directors are subject to this Code, which describes procedures for the internal reporting of violations of this Code. All employees, officers and directors must comply with those reporting requirements and promote compliance with them by others. Failure to adhere to this Code by any employee, officer or director will result in disciplinary action up to and including termination.

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CONFIDENTIALITY	

1. PURPOSE

This policy is designed to ensure that all employees understand the expectations on how to treat confidential information.

2. POLICY

All employees may be exposed to sensitive information about CivicPlus or our work environment at one time or another. This information is confidential and not to be disclosed to others outside of CivicPlus. The following are some examples of such information or knowledge: company operations, proprietary ideas or processes, programs, inventions, business plans, work practices, trade secrets, strategy, research, product/process development, financial information, customer information, business partner information, supplier information, other employee information or knowledge about persons pursuing employment with CivicPlus.

Any confidential knowledge or information should only be shared with other employees or members of management who need to know it in connection with their work for CivicPlus. In such cases, there will be no reason to disclose such information to outside individuals or third parties unless the employee is directed to do so by management or an officer of CivicPlus for business reasons. Approved disclosure of any such information to certain parties will be limited to only that approved information and only those approved parties. Should an employee breach confidentiality in any way, he/she will be subject to CivicPlus' full range of disciplinary action up to and including termination/dismissal.

Any complaints or allegations of a sensitive nature against CivicPlus or other employees will be handled with as much confidentiality as possible. This means that certain information may be disclosed to other employees or members of management if they need to know such information in connection with their work for CivicPlus. The utmost confidentiality will be maintained to the maximum extent possible by management and all concerned, but some information may need to be disclosed in order to conduct a proper and thorough investigation. Examples of confidential information that should not be shared outside CivicPlus:

- Client financial information
- Proprietary technical details of the CMS and/or system security
- Competitive bid information for RFPs, RFQs, RFIs, etc.
- Prospect lists, sales forecasts, company financials
- Strategies, business plans and marketing programs

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This restriction does not apply to lawful and truthful disclosures of reasonably necessary information by the employees involved in any discipline or investigation as may be necessary to report any issues with such actions.

Examples of confidential information that should not be shared with other employees (or people outside of CivicPlus):

- Employee disciplinary issues or investigations
- Any employee personal identification information (Social Security number, DOB, etc.)

All employees sign an employment agreement that prohibits the disclosure of confidential information to others. Please see the excerpt below from the employment agreement:

5.1 Confidential Information. As used in this Agreement, “Confidential Information” shall mean any information proprietary to Employer, including without limitation, inventions as defined below (except prior inventions), technology and information pertaining to research, development, techniques, engineering, programming, purchasing, marketing plans and strategy, selling, accounting, licensing, know-how, processes, products, equipment, devices, models, prototypes, computer hardware, computer programs, flow charts, program code, software, databases, formulae, compositions, discoveries, cost systems, projections, pricing information, profit margins, customer lists, customer needs or requirements, customer identity, potential customer identity, business development plans, analysis and projections, goals and objectives, and pending business transactions. Information shall be deemed Confidential Information regardless of its source, and all information designated, treated as or deemed to be Confidential Information by Employer shall conclusively constitute Confidential Information for all purposes. Employee agrees that, in addition to any other limitation contained in this Agreement, regardless of the circumstances of the termination of employment, he or she will not, during his or her employment, or at any time thereafter, for whatever reason, communicate to any person, firm, corporation, or other entity any information relating to customer lists, prices, secrets, advertising, processes, technology, or any confidential knowledge or secrets that Employee might from time to time acquire with respect to the business of Employer or to any of Employer's clients or customers, other employees, owners, investors, or third party partners and/or vendors. Confidential Information shall not include: (i) any information that is or becomes generally available to the public other than as a result of the wrongful disclosure by Employee or any other person bound by a duty of confidentiality or similar duty owed to Employer; (ii) any information which is required to be disclosed by court order or applicable law, provided prior notice is given to Employer; (iii) any information which was in the possession of, or was rightfully known by the Employee without an obligation to maintain is confidentiality prior to receipt from Employer; (iv) any information which is obtained by Employee in good faith from a third party having the right to disclose it without an obligation on confidentiality; or (v) your salary and wage . Confidential information does not include terms and conditions of employment protected by the National Labor Relations Act.

Employee acknowledges that Employer's business is intensely competitive and that by virtue of Employee's employment with Employer, Employee will have access to and knowledge of Confidential Information. Employee also agrees that the misuse or direct or indirect disclosure disclosures of Confidential Information to existing or potential competitors of Employer would place Employer at a competitive disadvantage and would harm and damage Employer's business. During his/her employment

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with Employer, Employee will (1) notify and provide Employer immediately with details of any unauthorized possession, use or knowledge of any Confidential Information, (2) assist in preventing any reoccurrence of such possession, use, or knowledge and (3) cooperate with Employer in any litigation or other action to protect or retrieve Confidential Information.

5.2 Covenant Not to Disclose. Employee recognizes and acknowledges that the Confidential Information obtained by Employee during the course of his or her employment constitutes a valuable, special and unique asset of Employer. Employee agrees that during his or her employment, or at any time thereafter, Employee will not, for whatever reason, disclose or communicate to any person, firm, partnership, organization, association, corporation or entity, any information pertaining to or regarding any of Employer's business practices or Confidential Information, regardless of whether or not all of the foregoing business practices, information or matters would otherwise be deemed confidential, material, or important. The parties hereto agree that, as between them, all business practices, Confidential Information, trade secrets or documentation and information pertaining to the same, are material, substantial, important and confidential and materially effects the successful conduct of the business of the Employer, and its goodwill, and that any breach of the terms of this covenant shall be a material breach of this Agreement.

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CONFLICT OF INTEREST

1. PURPOSE

The purpose of this Conflict of Interest policy (this “Policy”) is to foster public confidence in the integrity of CivicPlus while protecting the interests of CivicPlus, its employees, and the CivicPlus customer. This Policy shall apply to all employees of CivicPlus. CivicPlus expects its employees to maintain high standards of business conduct, and to be honest and ethical in all business dealings on behalf of or related to CivicPlus. Employees of CivicPlus should act in the best interest of CivicPlus when performing their employment responsibilities.

2. POLICY

CivicPlus employees are expected to conduct their business dealings with vendors, contractors, consultants, and/or customers in a manner that will avoid any conflict of interest, or appearance of a conflict of interest between such employees’ personal, financial, professional, or political interests and the interests of CivicPlus or those of a customer. It is the policy of CivicPlus that conflicts of interest should be avoided where possible, or otherwise disclosed and managed.

A “conflict of interest” exists when a person’s private interest interferes in any way with the interests of CivicPlus, or vice versa, through any activity or involvement in an activity, transaction, representation, or relationship by an employee that may damage CivicPlus’ reputation or financial interests; gives the appearance of impropriety; or in which an employee may possess an unfair competitive advantage. A conflict situation can also arise when an employee, officer, or director takes actions or has interests that may make it difficult to perform their CivicPlus work objectively and effectively or their civic duties without conflict or bias, or when an employee, officer, or director (or a member of their family) receives improper personal benefits as a result of their position at CivicPlus.

An employee of CivicPlus may serve a customer as a volunteer, in an elected position, or in any manner that does not involve CivicPlus or its business dealings; however, such engagement with a customer should be disclosed to the [Human Resources department](#). To avoid any actual or apparent conflict of interest, these employees should recuse themselves from any involvement in decision making on behalf of the customer that involve CivicPlus when working with CivicPlus.

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CivicPlus employees must avoid any relationship or activity that might impair, or even appear to impair, their ability to make objective and fair decisions when performing their jobs. At times, an employee may be faced with situations where the business actions taken on behalf of CivicPlus may conflict with the employee's own personal or family interests. All employees owe a duty to CivicPlus to advance its legitimate interests when the opportunity to do so arises. CivicPlus employees must never use CivicPlus property or information for personal gain or personally take for themselves any opportunity that is discovered through their position with CivicPlus.

Here are some other ways in which conflicts of interest could arise:

- Being employed by (you or a close family member, such as parent, spouse, child, or sibling) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with CivicPlus.
- Hiring or supervising family members or closely related persons.
- Serving as a board member for an outside commercial company or organization.
- Owning or having a substantial interest in a competitor, supplier or contractor.
- Having a personal interest, financial interest or potential gain in any CivicPlus transaction.
- Placing company business with a firm owned or controlled by a CivicPlus employee or their family.
- Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all CivicPlus employees.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict of interest question should seek advice from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their managers or the Human Resources department. Nothing in this policy shall be construed to permit, even with disclosure, any activity that is prohibited by law.

3. PROCEDURE

Conflicts of interest are generally prohibited as a matter of CivicPlus policy; and the existence of a situation in which a conflict of interest may arise, or an actual conflict of interest, may be approved by Human Resources, taking into consideration the facts surrounding the conflict of interest. All potential conflicts will be reviewed on an individual basis. A conflict of interest can arise at any time; employees must report any actual, or potential, conflict that exists to their manager and the [CivicPlus Human](#)

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[Resources department](#) as quickly as possible. If an employee is uncertain whether an event qualifies as a conflict of interest, the situation should be disclosed.

If it is determined that a conflict of interest does exist, CivicPlus has full discretion to deem what management or disciplinary action, if any, is fitting or necessary. CivicPlus may take disciplinary or corrective action, including termination, against any employee whose actions violate the standards, policies, or guidelines of CivicPlus. Furthermore, CivicPlus may take similar actions against an employee for their failure to disclose any existing or potential conflict of interest.

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DISCIPLINE & APPEAL PROCESS

1. PURPOSE

At CivicPlus, policies and guidelines exist to keep our operations running smoothly and to deliver outstanding service to our customers. When gaps arise in performance or conduct, our goal is to partner with employees to identify the issue, provide fair feedback, and support improvement—always balancing accountability with personal growth.

2. POLICY OVERVIEW

Most concerns can be resolved through informal coaching and timely, constructive feedback.

- **Coaching First.** Managers are encouraged to use regular check-ins and coaching conversations to clarify expectations and help employees succeed.
- **Progressive Improvement.** When additional structure is needed, we use a staged approach that gives employees clear notice of concerns, resources for improvement, and a reasonable timeframe to demonstrate progress.
- **Balanced Accountability.** While we strive for growth-oriented solutions, CivicPlus reserves the right to take any corrective action deemed appropriate—up to and including termination—based on the seriousness of the issue, relevant circumstances, and the employee’s record. Such decisions may be made without first issuing prior warnings when warranted by the facts.
- **At-Will Employment.** Nothing in this policy alters the at-will nature of employment; CivicPlus may end employment at any time, with or without cause or notice.

This policy is not a contract or guarantee of continued employment or any specific process. In certain situations, CivicPlus may modify or depart from this policy at its sole discretion if special considerations, organizational needs, or unique circumstances justify doing so.

3. IMPROVEMENT STEPS & DOCUMENTATION

Step	When It’s Used	What Happens
Coaching Conversation	Minor, first-time concerns	• Manager and employee discuss the issue, expectations, and next steps. • Manager sends a brief email summary for awareness—no formal record placed in the personnel file.
Written Warning	Concern persists or the issue is significant enough to document	• Manager meets with the employee to outline the concern and clarify expectations. • Written notice summarizes the issue, required improvement, and potential next steps.

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		• Employee acknowledges receipt; the document is filed with HR.
Final Warning	Lack of progress on prior plan or serious first-time issue	• Manager and HR meet with employee to review continued gap or serious incident. • Final expectations and possible consequences (up to termination) are provided in writing. • Document is signed and filed. Nothing in this step prevents immediate separation if warranted by subsequent conduct.
Separation	When previous efforts have not achieved required improvement or a violation is so serious that immediate termination is appropriate	• Manager and HR meet with the employee to communicate the decision. • Documentation is completed and filed.

4. SUSPENSION

A suspension is a temporary, precautionary removal from duties—paid or unpaid—used only when a serious policy violation is alleged and it is necessary to remove the employee from the work environment while the matter is reviewed. Suspension allows an impartial investigation and helps preserve workplace safety and integrity; it is not, by itself, a disciplinary outcome.

During a suspension:

- **Purpose & Scope.** HR and the manager will confirm—in *writing*—the reason for suspension, pay status, and expected duration.
- **Pay & Benefits.** Suspensions are typically paid unless policy or law dictates otherwise; benefits continue uninterrupted.
- **Availability.** The employee must remain reachable for follow-up discussions and cooperate fully with the review.
- **Next Steps.** Once the review concludes, the employee will either (a) return to work with clear expectations, or (b) move to the appropriate corrective action, up to and including separation.

Note: Human Resources must be consulted before the Written Warning stage or higher, including Final Warnings, Suspensions, or Terminations, to ensure consistency, legal compliance, and fairness.

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DISCIPLINE & APPEAL PROCESS	

5. APPEAL PROCESS

If an employee believes pertinent information was overlooked during the warning or disciplinary stage, they may submit additional facts for review through the appeal process.

1. **Written Appeal.** Within three (3) business days of receiving a Warning or higher action, the employee may submit a written appeal to HR outlining concerns and any supporting evidence.
2. **Review.** HR will acknowledge the appeal within one (1) business day, gather relevant facts, and confer with the employee's manager, the employee and other stakeholders as needed.
3. **Department-Head Decision.** HR will present the information to the Head of the employee's department (ELT or LT member). That leader will make the final determination and notify HR. There shall be no opportunity for further internal review beyond this point.
4. **Response.** HR will communicate the outcome in writing within three (3) business days—unless additional time is required due to complexity, in which case the employee will be kept informed.
5. **Recordkeeping.** Appeal outcomes are documented and placed in the personnel file.

6. OUR COMMITMENT

We believe constructive feedback, clear expectations, and a genuine chance to improve are essential to high performance and a healthy culture. By following this policy, we uphold our values in helping each team member grow while ensuring we consistently deliver for our customers.

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DRUG-FREE WORKPLACE, DRUG & ALCOHOL TESTING

1. PURPOSE

CivicPlus is committed to providing a safe, quality-orientated and productive work environment consistent and compliant with our core values and the expectations of our clients. CivicPlus recognizes that alcohol and drug abuse pose a significant threat to the health and safety of its employees. For these reasons, CivicPlus is committed to eliminating drug and/or alcohol abuse in the workplace.

2. POLICY

This policy recognizes that employee involvement with alcohol and other drugs can be very disruptive, adversely affect the quality of work and performance of employees, pose serious health risks to users and others, and have a negative impact on productivity and morale.

CivicPlus has no intention of interfering with the private lives of its employees unless involvement with alcohol and other drugs or substances off the job affects job performance or public safety. However, CivicPlus does expect its employees to report to work free of any adverse effects of drugs, alcohol, or other substances.

As a condition of employment, CivicPlus requires employees to adhere to this policy. CivicPlus also encourages employees to voluntarily seek help with drug and alcohol problems and addictions.

3. COVERED EMPLOYEES

All CivicPlus employees, any individual who is conducting business for CivicPlus, is applying for a position, or is conducting business on CivicPlus property is covered by and must comply with our drug-free workplace policy. Our policy includes, but is not limited to, the CEO, executive leadership team, directors, managers, full-time and part-time employees, temporary and intern employees, off-site/remote employees, contractors and applicants.

4. WORK RULES

Whenever prospective or current employees are working, operating any rented vehicles in conjunction with CivicPlus work, present on CivicPlus property, or are conducting company related work off-site, they are prohibited from:

1. Using, possessing, buying, selling, manufacturing, distributing or dispensing any illegal drugs, state legalized recreational/medicinal drugs, and inhalants, to include possession of such drug paraphernalia;
2. Abuse of alcohol or substances or become impaired during working hours. CivicPlus allows the consumption of alcohol at work in moderation during company sponsored events. All

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prospective or current employees must observe all state, federal, and local laws regarding alcohol possession and use;

3. Being under the influence of an illegal drug or being impaired at work due to the use of individual state legalized recreational/medicinal drug as defined in this policy or having a detectable amount of any illegal drugs in the prospective or current employee's body system or, for legal substances, an amount sufficient to indicate impairment.

CivicPlus also prohibits the illegal or unauthorized use of prescription drugs. It is a violation of this policy to intentionally misuse and/or abuse prescription medications.

5. NOTIFICATION OF CONVICTIONS OR CRIMES INVOLVING DRUGS

CivicPlus does not desire to intrude into the private lives of its prospective or current employees. However, CivicPlus reserves the right not to hire a prospective employee or to take appropriate disciplinary action against a current employee for drug or alcohol usage/sale/distribution that is illegal under state, federal, or local law that occurs while off company time and/or company premises. All employees who are convicted of, plead guilty to, or are sentenced for a crime involving drugs or alcohol are required to report the conviction, plea, or sentence to Human Resources within five (5) calendar days. CivicPlus will take appropriate action within 30 days of notification.

6. REQUIRED TESTING

Reasonable Suspicion – Employees are subject to drug and alcohol testing if suspected of improperly using illegal drugs, state legalized recreation/medical drugs, or alcohol use, possession, influence, or impairment based on credible observation by their coworkers, manager, or Human Resources. Employees and Managers should report any reasonable suspicion of impairment or apparent workplace illegal drug, state legalized recreation/medical drugs, or alcohol use, possession, influence, or impairment to Human Resources before further action is taken. Under no circumstances will the employee be allowed to drive him or herself to the testing facility if impairment is observed. Human Resources will make arrangements for the employee to be transported to the testing facility and home after testing.

An employee sent for reasonable suspicion testing will be placed on an Administrative Leave of Absence until the results are finalized.

Employees have the following rights upon request:

- To obtain written test results;
- To pay for a confirmatory retest; and

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- To explain a positive test result in a confidential setting.

7. VIOLATION OF THIS POLICY

If an individual violates this policy, the consequences are as follows:

1. Current employees who test positive for illicit drugs under this policy will be subject to a mandatory referral to a substance abuse program. Employees receiving a mandatory referral under this policy will be placed on a Leave of Absence while completing their mandatory substance abuse program. Once the employee has completed the program, they will be placed back at work, in their same or equally comparable position. If the employee does not remain drug free while at work and post program completion, the employee will be subject to disciplinary action, up to and including termination.
2. Current employees who refuse to cooperate in a drug or alcohol test or who use, possess, buy, sell, manufacture, distribute or dispense an illegal drug or a state legalized recreational/medical drug in violation of this policy will be terminated.

8. CONFIDENTIALITY

Test result reports acquired in drug or alcohol screenings are private and confidential information and will be kept confidential to the extent required by law and maintained in secure files.

9. NATIONAL POLICY

CivicPlus recognizes that certain states in which CivicPlus conducts business and has full-time or part-time employees have deemed the use and possession of medical marijuana and/or recreational marijuana legal. However, CivicPlus is a Kansas corporation operating under and regulated by the laws in the state of Kansas, and as such, CivicPlus recognizes Kansas laws as priority. As a condition of employment with CivicPlus, all prospective and current employees of CivicPlus, whether remote or local, agree to be bound by this company policy regardless of the state in which the employee works and resides.

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EEO & DIVERSITY, EQUITY & INCLUSION	

1. EQUAL OPPORTUNITY

CivicPlus provides equal employment opportunities to all employees and applicants for employment without regard to race, color, ancestry, national origin, gender, sexual orientation, marital status, religion, age, disability, gender identity, results of genetic testing, service in the military, or any other status protected by applicable law. Equal employment opportunity applies to all terms and conditions of employment, including hiring, placement, promotions, tenure, terminations, layoff, recall, transfer, leave of absence, compensation, training and terms and conditions.

CivicPlus expressly prohibits any form of unlawful employee harassment or discrimination based on any of the characteristics mentioned above. Improper interference with the ability of other employees to perform their expected job duties is absolutely not tolerated.

The Vice President of Human Resources serves as the EEO Compliance Officer of CivicPlus, responsible for implementing the EEO plans, monitoring EEO compliance and communication regarding EEO compliance. The Director of Talent Acquisition will work with all hiring managers to identify opportunities for compliance improvement and to pro-actively seek qualified diverse candidates.

2. AMERICANS WITH DISABILITIES ACT (ADA) AND REASONABLE ACCOMMODATION

To ensure equal employment opportunities to qualified individuals with a disability, CivicPlus will make reasonable accommodations for the known disability of an otherwise qualified individual, unless undue hardship on the operations of the business would result. CivicPlus will comply with all applicable federal, state, and local disability accommodation laws.

Employees who may require a reasonable accommodation should review the process [for requesting an accommodation](#) and contact the [Human Resources Department](#).

3. RELIGIOUS EXPRESSION AND ACCOMMODATION

CivicPlus is dedicated to treating the religious diversity of all our employees equally and with respect.

Religious Communication & Behaviors

It is not a violation of this Policy for employees to discuss religion, or to read or view religious materials, at work during non-working time. However, employees who do so should be sensitive to and respectful of the different beliefs (or lack of belief) of others. When another employee objects to religious advances, such behaviors and efforts must immediately cease. Moreover, religious practices that interfere with job performance, excessive “preaching” that is unwelcome to others, or adverse

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treatment of others because of their beliefs, different beliefs, or lack of belief, may be considered “harassment” within the meaning of this and other existing policies.

Religious Accommodations

Employees may request an accommodation when their religious beliefs cause a deviation from CivicPlus’ dress code, schedule, leave or other aspects of employment. As such, CivicPlus welcomes any requests for accommodations because of recognized beliefs that do not create an undue hardship on the CivicPlus’ ability to properly fulfill its mission.

CivicPlus will consider the request but reserves the right to offer its own accommodation to the extent permitted by law. Some, but not all, of the factors that CivicPlus will consider are cost, the effect that an accommodation will have on current established policies and the burden on operations, including other employees, when determining a reasonable accommodation.

The procedure for reasonable accommodation requests includes:

- Employee advises his or her supervisor and Human Resources of the need for accommodation.
- The accommodation request will be discussed with the employee and the employee’s supervisor.
- If a reasonable appropriate accommodation is readily available, the request will be approved and the accommodation implemented.
- If an accommodation is not readily ascertainable, the matter will be pursued further with assistance from appropriate external resources.

At no time will CivicPlus question the validity of a person’s sincerely held religious beliefs.

Personalization of Work Areas and Holiday Decorations

Employees are generally permitted to engage in private expression, including displays of religious ornamentation, in personal work areas that are not regularly open to the public. However, CivicPlus reserves the right to restrict workplace décor for legitimate reasons relating to safety, hygiene, or environmental conditions.

In a public workspace, that is, a space to which the public has physical or visual access, only secular decorations, including secular holiday decorations, may be displayed. Religious symbols or decorations with religious content may not be displayed in public workspaces.

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4. DIVERSITY, EQUITY & INCLUSION POLICY

CivicPlus is committed to fostering, cultivating and preserving a culture of diversity, equity and inclusion. CivicPlus is committed to creating and maintaining a workplace in which all employees have an opportunity to participate and contribute to the success of the business and are valued for their skills, experience, and unique perspectives. This commitment is embodied in company policy and the way we conduct business at CivicPlus. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation and company's achievement as well.

We embrace and encourage our employees' differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make our employees unique.

CivicPlus' diversity initiatives are applicable—but not limited—to our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; layoffs; terminations; and the ongoing development of a work environment built on the premise of gender and diversity equity that encourages and enforces:

- Respectful communication and cooperation between all employees.
- Teamwork and employee participation, permitting the representation of all groups and employee perspectives.
- Work/life balance through flexible work schedules to accommodate employees' varying needs.
- Employer and employee contributions to the communities we serve to promote a greater understanding and respect for the diversity.

All employees of CivicPlus have a responsibility to treat others with dignity and respect at all times. All employees are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site, and at all other company-sponsored and participative events. All employees are also required to attend and complete annual diversity awareness training to enhance their knowledge to fulfill this responsibility.

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Any employee found to have exhibited any inappropriate conduct or behavior against others may be subject to disciplinary action, up to and including termination.

Employees who believe they have been subjected to any kind of discrimination that conflicts with the company’s diversity policy and initiatives should seek assistance from management or Human Resources. CivicPlus strictly prohibits retaliation against any employee who raises concerns or participates in investigations related to diversity, equity, and inclusion matters.

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EMPLOYMENT CLASSIFICATION

1. PURPOSE

It is the intent of CivicPlus to clarify the definitions of employment classifications so that employees understand their employment status and benefits eligibility. These classifications do not guarantee employment for any specified period of time.

2. FAIR LABOR STANDARDS ACT JOB CLASSIFICATIONS

All employees are designated as either non-exempt or exempt under state and federal wage and hour laws:

- **Non-Exempt** – Are employees whose work is covered by the Fair Labor Standards Act (FLSA). They are not exempt from the law's requirements concerning minimum wage and overtime. Non-exempt employees are paid on an hourly basis and are eligible to receive overtime pay for overtime hours worked.
- **Exempt** – Are generally executives or managers or professionals, administrative or outside sales staff who are exempt from the minimum wage and overtime provisions of the FLSA. Exempt employees hold jobs that meet the standards and criteria established under the FLSA by the U.S. Department of Labor.

3. COMPANY JOB CLASSIFICATIONS

CivicPlus has established the following categories for both non-exempt and exempt employees:

- **Regular, Full-Time** – Employees who are not in a temporary status and are regularly scheduled to work the organization's full-time schedule. Generally, they will work a minimum of 30 hours weekly and are eligible for the full benefits package, subject to the terms, conditions and limitations of each benefit program.
- **Regular, Part-Time** – Employees who are not in a temporary status and who are regularly scheduled to work fewer than 30 hours weekly, but at least 20 hours per week. Regular part-time employees are eligible for some of the benefits offered by the company, subject to the terms, conditions and limitations of each benefits program.
- **Intern** – Intern employees work varied schedules on a temporary basis. Their timeline of employment is generally outlined and in writing at time of offer. Employment beyond any initially stated period does not in any way imply a change in employment status.

Human Resources will do a periodic review of all classifications to ensure that CivicPlus is in compliance with all Federal Wage and Hour requirements.

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GENERATIVE ARTIFICIAL INTELLIGENCE (AI) POLICY	

1. INTRODUCTION

CivicPlus has developed corporate policies that identify the security requirements for its information systems and personnel to ensure the integrity, confidentiality, and availability of its information. These policies are set forth by CivicPlus management.

2. PURPOSE

This Generative AI Tools Standard (“Policy”) provides guidance for the acceptable use of all third-party Generative AI tools (“AI tools”). These policies are consistent with applicable state and federal laws, Executive Orders, directives, regulations, standards, and guidance. AI tools are powerful and can provide significant benefits, but also can provide inaccurate results and can carry risks to confidentiality and intellectual property rights.

3. SCOPE

The provisions of this Policy pertain to all CivicPlus employees, contractors, third parties, and others who have access to company and/or customer confidential information within CivicPlus systems and facilities.

4. ARTIFICIAL INTELLIGENCE (AI) TOOLS

AI tools are computer programs that can create new content on their own, usually in response to a “prompt” or input. This content can include text, images, music, and software code. Examples include ChatGPT, ChatGPT Plus, Midjourney, Stable Diffusion, Dall-E, Bard, Bing Chat, and Copilot, along with other similar tools. Other examples include programs that add to productivity, such as Otter, SchedulerAI, and Clockwise.

5. GENERAL PRINCIPLES AND ACCEPTABLE USE CASES TO GUIDE YOUR USE OF AI TOOLS

Protect Confidential Information and Intellectual Property Rights

In our work for CivicPlus, we are entrusted with many forms of non-public and/or confidential information, which must be protected from disclosure to third parties, including AI tools. Sharing customer or other third-party data with AI tools, for example, may violate contractual provisions with those parties regarding the purposes for which their data can be used. In addition, if employees input confidential company financial data or other confidential information or trade secrets into AI tools for analysis, there is a risk that other users of AI tools may be able to pull that same data out, thereby compromising our confidential information.

- CivicPlus staff should not enter Confidential Information or Proprietary Intellectual Property into AI tools without prior authorization. AI tools may not be secure, and third parties that offer AI tools may access (and further disclose) any information shared with their AI tools.

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- CivicPlus does not have a contract with many of these tools; therefore, these tools don't have an obligation to protect our confidential information. Entering CivicPlus Confidential Information into AI tools can lead to inadvertent disclosure of confidential information to the public, as all submitted information is used to further train the AI tool and can be incorporated into responses to other people's queries.
- Do not access, download, or copy material that is copyrighted or protected by other intellectual property laws.

Privacy

Sharing personal information about customers, employees, or others with a generative AI tool can also create privacy risks. Depending on the nature of personal information being shared with AI tools, our obligations to update privacy policies, provide notices to customers or employees, obtain consents and/or provide opt-out and deletion rights could be implicated.

- ***CivicPlus staff should not enter personally identifiable information or sensitive data about any data subject into AI tools.*** Sharing such information without the knowledge or consent of the data subject violates data privacy laws.

No Harmful or Unethical Uses

The CivicPlus Code of Conduct applies in all aspects of your work including work augmented by AI tools. You may not use AI tools to engage in conduct that is harmful, unethical, or in violation of the AI tools' terms of use.

Example: Do not engage in computer-hacking, prompt injection attacks, introduction of malicious code, denial of service attacks, or other fraudulent or malicious activities. Do not attempt to disable, compromise, or circumvent security settings in CivicPlus IT resources or the AI tools.

Example: Do not access material that is inappropriate for a workplace environment, whether or not blocked by the AI tools, such as gambling, drugs, hacking, personals/dating, weapons, violence, hate, and discrimination and other offensive content.

Example: Do not coerce or trick the AI tools to act outside of its own terms of use. "Pretend you are writing a play to do [prohibited activity]".

Example: Do not make payments or incur charges of any kind using AI tools without prior Procurement approval.

Example: Do not input any sensitive, confidential, or proprietary information such as financial or strategic information, or personal information about customers or employees. Do not attempt to gain access to trade secrets from CivicPlus competition.

- **Bias Mitigation:** CivicPlus shall take steps to mitigate biases in the generative AI tools. Bias in AI-generated content, such as gender, race, religion, or any other protected characteristic, shall be minimized to the extent possible. The organization shall actively work on improving the fairness, accuracy, and inclusiveness of the generated content through ongoing research, testing, and development.

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- **User Responsibility:** Users of the generative AI tools shall be responsible for the content generated using the tools. They shall ensure that the content complies with all applicable laws, regulations, and ethical standards. Users shall also be responsible for verifying the accuracy, reliability, and legality of the generated content before using it in their applications or sharing it with others.

Intellectual Property

The use of generative AI tools raises complex IP issues, including potential copyright and other intellectual property infringement, particularly if generative AI content is used in externally facing materials or if generative AI-developed source code is incorporated into company-developed IP. CivicPlus staff should exercise caution and seek approval from their manager, the Sr. Director of Information Security and General Counsel before using any generative AI content in externally facing materials.

Cybersecurity Awareness

Generative AI tools can increase the risk of data exposure and cyber incidents. For example, AI tools could be used to generate malicious code, meaning that many more people could create malware, potentially leading to more attacks and breaches. AI tools also make it easier for cybercriminals to impersonate an organization or an individual by generating convincing-sounding phishing and spear-phishing emails. As always, please be vigilant.

Consent

Even where an AI tool has been approved by CivicPlus for general use, if you are using it when interacting with a third party, such as when using a notetaking AI tool during a call with a coworker or a prospect, consent should always be requested prior to engaging the AI tool. If an objection is made, the AI tool should not be used.

AI Tools Are Not A Substitute For Human Judgment

CivicPlus recognizes the limitations of AI tools and will always use its judgment and asks employees do the same when interpreting and acting on AI-generated outputs, recommendations, or analyses. AI tools may be used to augment human decision-making but not to replace it.

6. ENGINEERING

Generative AI Tool GitHub CoPilot has been approved for use within CivicPlus for engineering purposes.

Engineer Responsibilities

- **Security/Privacy**
 - CivicPlus Engineers must use CivicPlus-provided accounts for use of GitHub CoPilot. Personal Accounts are not authorized for use within CivicPlus.
 - Exercise caution when using GitHub Copilot with sensitive or confidential information. Developers should not generate code that may compromise the security or privacy of

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company data. Follow generally approved practices for abstracting any direct company data in code, and do not use company or customer data as prompts for code generation.

- **Quality**
 - Engineers are responsible for thoroughly reviewing and testing code generated by GitHub Copilot to ensure its functionality, security, and adherence to coding standards. While GitHub Copilot can assist in code generation, developers must maintain control over the codebase, ensuring that it meets project requirements and follows established guidelines.
 - Engineers should strive for high-quality code by combining AI-generated content with manual coding practices, optimizing for readability, maintainability, and performance.
 - Developers must be conscious of potential biases in AI-generated code. Actively work to identify and address bias, ensuring that code does not perpetuate discriminatory or unfair practices.
- **Intellectual Property**
 - Developers must ensure that code generated using GitHub Copilot does not infringe on the intellectual property rights of others. Verify the originality of the generated code and avoid using proprietary or copyrighted material. Please see required configuration below for more details.
- **Training and Review**
 - Encourage collaboration among developers to share insights and knowledge on effectively utilizing GitHub Copilot, fostering a culture of continuous improvement.
 - Conduct regular audits of code repositories to ensure compliance with this policy and to identify areas for improvement in the use of GitHub Copilot.
- **Engineers must implement and adhere to the following configuration settings:**
 - **Two-Factor Authentication (2FA):** Enabling 2FA adds an extra layer of security to user accounts. Ensure that 2FA is enabled for all user accounts associated with GitHub Copilot.
 - **Repository Access Controls:** Implement proper access controls to restrict access to repositories based on roles and responsibilities. Use GitHub's repository settings to manage permissions and ensure that only authorized individuals have access to sensitive code.
 - **Code Scanning:** Enable GitHub's code scanning feature to automatically detect and address security vulnerabilities in the generated code. This can help identify potential issues before they become security risks.
 - **Dependency Scanning:** Utilize GitHub's dependency scanning features to identify and address vulnerabilities in third-party dependencies used in the generated code.
 - **Branch Protection:** Implement branch protection rules to prevent unauthorized changes to critical branches. This helps ensure that only approved changes are merged into important branches.

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- Audit Logs: Enable and regularly review GitHub's audit logs to track user activity and changes made within repositories. This can help identify any suspicious or unauthorized actions.
- Secure Coding Practices: Educate developers on secure coding practices to complement GitHub Copilot's assistance. Encourage them to review and test generated code for security vulnerabilities.
- Secure Development Environment: Ensure that the development environment where GitHub Copilot is used is secure. This includes using secure communication channels, regularly updating software, and employing security best practices.
- Regular Updates: Keep GitHub Copilot and all associated tools and plugins up to date with the latest releases to benefit from security patches and improvements.
- Github Copilot Settings:
 - "code suggestions should match public code" should be set to off or not allowed
 - "prompts and suggestions should be collected and retained by Github" should be set to off or not allowed

7. INFORM LEADERS

Given the risks posed by generative AI tools, the use of generative AI tools for business purposes should be reviewed by your manager, the Director of Information Security and General Counsel prior to exploring such use for business purposes or using CivicPlus resources. This will help us ensure that we are putting the right guardrails in place to protect CivicPlus and act responsibly toward our customers, employees, vendors and other stakeholders. Keep in mind that even with prior approval, any use of generative AI tools must comply with applicable law, CivicPlus policies, and the terms and conditions for use of the generative AI tools.

8. EDUCATION AND AWARENESS

CivicPlus shall provide education and awareness programs to users about the responsible and ethical use of generative AI tools. This shall include providing guidelines, best practices, and training on topics such as bias mitigation, privacy protection, and content moderation. CivicPlus shall also actively engage with users to gather feedback, address concerns, and improve the tools based on user needs.

9. CONTINUOUS IMPROVEMENT

We expect that generative AI technology and the control systems and regulatory frameworks surrounding its use will continue to evolve. CivicPlus shall continually monitor and improve the generative AI tools and the policies surrounding their use. This shall include regular updates to the AI models, algorithms, and data sources used in the tools to ensure accuracy, fairness, and safety. CivicPlus shall also review and update the policy as needed to align with evolving legal, ethical, and technological standards.

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10. INCIDENT REPORTING

If you suspect a violation of this policy or have potential legal, regulatory, or ethical concerns, please immediately report them to the Director of Information Security.

11. ADDITIONAL RESOURCES

- [Code of Ethics](#)
- [Rules of Behavior \(ROB\)](#)
- [Confidentiality Policy](#)
- [Cybersecurity Plan \(Strategy\)](#)

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LEAVE OF ABSENCE: PAID PARENTAL LEAVE, FMLA, MILITARY LEAVE, & PERSONAL LEAVES

1. PURPOSE

CivicPlus is committed to providing its employees necessary resources and time to care for themselves or family members during times of change or medical conditions. To do so, CivicPlus offers paid parental leave (PPL), Family Medical Leave (FMLA), Military Leave, and Personal Leave to eligible employees.

It is the policy of CivicPlus that whenever the need arises for an employee to be away from work (non-vacation time) that will last longer than five (5) working days, they consult with their manager and Human Resources (HR) as soon as reasonably possible. To initiate a Leave of Absence, the employee will initiate the leave through the 3rd party Leave of Absence, UNUM. Each type of leave that CivicPlus offers is described further in this policy:

2. [Paid Parental Leave \(PPL\)](#)
3. [Family Medical Leave Act \(FMLA\)](#)
4. [Military Leave](#)
5. [Personal Leave of Absence](#)
6. [Other Leaves of Absence](#)
7. [Applicable to all Leave of Absences Outlined](#)

2. PAID PARENTAL LEAVE (PPL)

Overview

- The purpose of paid parental leave is to enable the employee to recover from giving birth and care for and bond with a newborn, a newly adopted, or newly placed child. Leave for pre-birth bedrest or other pregnancy-related complications are not covered by PPL but may be available under the FMLA, state law or Flexible Time Off. This policy will run concurrently with all other leaves of absence under federal and state law, including FMLA, as applicable. Notwithstanding the foregoing, in all events, CivicPlus will comply with the applicable state law.

CivicPlus will provide:

- up to **12 weeks** of paid parental leave to:
 - the employee who gives birth, to cover medical recover and child bonding; or
 - The employee who serves as the primary adoptive parent or primary caregiver in the case of surrogacy in lieu of birth; and
- up to **6 weeks** of paid parental leave to:
 - the non-birthing parent or non-primary caregiver employee following a birth, adoption, or placement for the purpose of child bonding

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LEAVE OF ABSENCE: PAID PARENTAL LEAVE, FMLA, MILITARY LEAVE, & PERSONAL LEAVES

Eligibility

Birth Parent, Primary Adopting or Surrogacy Parent PPL: Eligible employees must meet the following criteria:

- Full-time, 30+ hours per week (part-time, contract, temporary employees and interns are not eligible for this benefit unless required by state law).
- Has given birth to a child.
 - Able to provide a certificate of disability completed by the employee's health care provider in eligible States.
- Has adopted a child or been placed with a foster child (in either case, the child must be age 18 or younger). The adoption of a new spouse's child is excluded from this policy.
 - Provide proof of surrogacy or adoption in lieu of birth

Non-Birth Giving, Primary Adopting or Surrogacy Parent PPL: Eligible employees must meet the following criteria:

- Full-time, 30+ hours per week (part-time, contract, temporary employees and interns are not eligible for this benefit unless required by state law. Please see HR for details.).
- Spouse or domestic partner of a person who has given birth to a child.

Amount, Time Frame, and Duration

Eligible employees will receive PPL per birth, adoption or placement of a child/children. The fact that a multiple birth, adoption or placement occurs (e.g., adoption of siblings) does not increase the total amount of PPL granted for that event. In addition, in no case will an employee request more than one PPL in a rolling 12-month period, regardless of whether more than one birth, adoption or foster care placement event occurs within that 12-month time frame.

Birth Giving, Primary Adopting or Surrogacy Parent PPL: Eligible employees will be compensated at 100% of the employee's regular salary or hourly rate (excluding commission, bonuses, or other incentive pay) weekly pay for a total of 12 weeks' worth of pay per birth. The fact that a multiple birth occurs (e.g., the birth of twins) does not increase the 12-week total amount PPL granted for that event.

PPL begins the day of the birth. Employees must take all 12 weeks consecutively. If you choose to return to work early (with doctor's allowance), you will forfeit the remaining time and payments for this leave, unless otherwise required by applicable law, but may continue utilize FMLA if available along with other leave programs provided by CivicPlus that are applicable (i.e. FTO).

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Non-Birth Giving PPL: Eligible employees will be compensated 100% of the employee's regular salary or hourly rate (commission and bonuses excluded) weekly pay for a total of 6 weeks' worth of pay per bonding time. PPL will be paid on regularly scheduled pay dates.

CivicPlus will provide 6 weeks of continuous PPL to employees to bond following the birth of a spouse or domestic partner's child or the placement of a child with an employee in connection with adoption or foster care.

It is required that the employee takes the 6-week PPL in one continuous period of leave. However, approved PPL may be taken at any time during the 12-month period immediately following the birth, adoption, or placement of a child. Any unused leave will be forfeited at the end of the 12-month time frame.

Requesting an Extension

To request an extension of leave after completing your scheduled PPL, please notify HR and your manager as soon as possible to apply for a personal leave of absence. Employees who wish to take Flexible Time Off after their scheduled PPL ends, must follow the [Paid Time Off policy](#) for Flexible Time Off and Sick leave.

Employees who do not have available FMLA to cover paid time off as mentioned above, may request to take unpaid time off after their scheduled PPL ends if the time is approved by their manager and HR. The maximum unpaid time off available under the PPL policy is 8 weeks unpaid under any 12-month period.

Upon returning to work, if an employee chooses to have a reduced working schedule, they can do so for up to two weeks after completing their scheduled PPL and is approved by the manager and HR.

Return to Work

To the extent and under the terms required by applicable law, birth-giving employees returning from PPL may be asked to provide medical certification of ability to return to work. Birth-giving and non-birth-giving/bonding employees approved to return to work are guaranteed employment in the same or an equivalent position. An employee's failure to return to work at the conclusion of a PPL may result in termination unless the employee is eligible for and has been granted personal leave of absence. In the event an employee requests a job transfer when returning from leave, employees may be eligible to a less strenuous position/duties if medically advisable and can be reasonably accommodated.

An employee's failure to return to work at the conclusion of a PPL may result in termination unless the employee is eligible for and has been granted a different leave.

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Job Benefits and Protection

CivicPlus will maintain all benefits for employees during the paid parental leave period just as if they were taking any other company paid leave such as paid vacation leave or paid sick leave. Thus, if you are an employee you must continue to pay your share of the plan premiums during the leave. Premiums will be paid by payroll deduction.

All other benefits will be governed in accordance with the terms of each benefit plan and are the sole responsibility of the employee.

Coordination with Other Policies

PPL taken under this policy will run concurrently with other applicable federal and state leave, such as the Family and Medical Leave Act (FMLA), or any applicable state or local family leave laws. Any leave taken under this policy that falls under the definition of circumstances qualifying for leave due to the birth or placement of a child due to adoption or foster care, the leave will be counted toward the 6 weeks of available leave per a 12-month period. Accordingly, any leave taken under this policy for the birth, adoption, or placement of a child will be applied against any overlapping job-protected leave entitlements available under applicable law. All other requirements and provisions under those leaves will apply.

Employees are strongly encouraged to apply for any available public wage replacement benefits (such as state family or bonding leave) where applicable. Please contact HR for guidance.

Parental leave pay will be coordinated with other payments for the employee who receives wage replacement benefits through the state, such as CA PFL, or other local law programs.

3. FAMILY MEDICAL LEAVE ACT (FMLA)

Eligible employees may be entitled to leave under the Family Medical Leave Act (FMLA) for specified family and medical reasons. The purpose of this policy is to provide employees with a general description of their FMLA rights. In the event of any conflict between this policy and the applicable law, employees will be afforded all rights required by law. If you have any questions, concerns or disputes with this policy, please contact HR.

Eligibility

To be eligible for leave under this policy, CivicPlus employees must meet **all** of the following requirements:

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- Have worked at least twelve (12) months for CivicPlus;
- Have worked at least 1,250 hours during the twelve (12) months preceding the date the leave would commence;
- Periods of absence due to military service, including the National Guard or Reserves, will not be considered a break in service and will count toward this requirement.

The 12 months of employment do not have to be consecutive. All periods of absence from work due to or necessitated by service in the uniformed services are counted as hours worked in determining eligibility.

Qualified Leave Reasons

FMLA leave is available to eligible employees if the procedures of this policy are followed, and the leave is requested for any of the following reasons:

- The birth or adoption of a child or receiving a child for foster care; within one year of birth or placement.
- To care for the spouse, child or parent of the employee if that individual has a serious health condition.
- To care for a covered service member with a serious injury or illness if the eligible employee is the service member's spouse, son, daughter, parent, or next of kin (military caregiver leave).
- The employee's own serious health condition that makes the employee unable to perform essential job functions; or
- Any qualifying exigency arising out of the fact that the employee's spouse, son, daughter, or parent is a covered military member on "covered active duty;" or has been notified of an impending call or order to "covered active duty."

Amount of Leave

Eligible employees may take up to a maximum of 12 weeks of unpaid leave during a single 12-month period. Leave for the birth and care or placement and care of a child must conclude within 12 months of the birth or placement of the child.

Military caregiver leave is a maximum of 26 weeks during a single 12-month period. FMLA applies equally to male and female employees.

If eligible spouses or domestic partners are both employed by CivicPlus, the maximum of aggregate leave both may take for birth, adoption or placement in foster care of a child is 12 weeks; and the maximum aggregate leave both may take for military caregiver leave is 26 weeks in a 12-month period for FMLA purposes, but does not limit the amount of leave eligible for employees to take under parental paid leave.

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CivicPlus uses a 12-month rolling back method for calculating the amount of leave available. Under this method, each time an employee takes FMLA leave, the remaining leave entitlement would be any balance of the 12 weeks which has not been used during the immediately preceding 12 months.

For military caregiver leave, the 12-month period begins on the first day the employee takes leave to care for the serious injury or illness of a covered service member and expires 12 months after that date.

In certain circumstances, the employee may take intermittent leave or a reduced leave schedule. Intermittent leave, or leave on a reduced schedule, is generally available when medically necessary, as certified by a healthcare provider. However, in certain circumstances intermittent leave may require prior approval from the employee's manager. If intermittent leave, or reduced schedule leave, is available, CivicPlus reserves the right to reassign the employee to a position that better accommodates the need for such leave and which would reduce the interruption to CivicPlus' operations. Such an alternate position will have equivalent pay and benefits but does not have to have equivalent job duties.

Use of Paid Leave

An employee who is taking FMLA leave because of the employee's own serious health condition, or the serious health condition of a family member may use FTO concurrently with the FMLA leave upon HR and manager approval. The use of FTO is concurrent with the FMLA leave and does not extend the maximum available FMLA allowance.

Disability leave for the birth of the child and for an employee's serious health condition, including workers' compensation leave (to the extent that it qualifies), will be designated as FMLA leave and will run concurrently with FMLA. To receive the full benefit of any leave, paid or unpaid, please consult with HR to ensure all options are explored before going on a LOA.

FMLA and Short-Term Disability

Any FMLA leave to which an employee may be entitled runs concurrently with time off granted under the use of Short-Term Disability. Any time spent on short-term disability counts as part of an employee's FMLA leave.

Every FMLA/Short-Term Disability situation is different based on your type of disability or delivery, how much time is requested off, and state law. For more information regarding the FMLA and short-term disability contact the [HR](#) department.

Notice Requirement

Employees seeking FMLA leave are required to provide at least 30 days' advance notice of the proposed leave when foreseeable. Where 30 days' advance notice is not possible, such as in a medical emergency

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or for intermittent leave, notice should be given as soon as practicable. Required notice must be provided to HR.

Medical Certification and Reporting

Medical certification, deemed to be reasonably sufficient by CivicPlus, from a health care provider will be required to support FMLA leave requests for leave based on an employee or family member's serious health condition or for military caregiver leave. Additionally, when returning to work after taking FMLA leave for the employee's serious health condition, the employee will be required to provide medical certification that the employee is fit to return to work. CivicPlus may require the employee to provide periodic reports on their status during the FMLA leave and on their intent to return to work. Whenever an employee learns of a change in the anticipated length of the FMLA leave, the employee must notify CivicPlus, in writing, within two calendar days of learning of such change.

Benefits

While on FMLA leave, including any unpaid leave, the employee is required to continue to pay the employee's portion of any health insurance premiums normally deducted from the employee's paycheck. This amount shall be paid before the first of the month for the next month's coverage unless payroll deduction of the employee's premium is possible during leave. Employees should make arrangements before the leave begins, if possible. The employer will continue to pay the employer's portion of the premium during FMLA leave.

The employer's obligation to continue health benefits will stop if:

- The employee informs CivicPlus of an intent not to return to work at the end of the leave period.
- The employee fails to return to work when the FMLA leave entitlement is exhausted.
- The employee does not pay his/her portion of the insurance within 30 days of the date that payments are due.

Other benefits normally provided to an employee shall be provided during FMLA leave only if permitted by the plan document governing the provision of such benefits and only if the employee makes any required co-payments.

If an employee fails to return to work after an FMLA leave, the employer has the right to recover from the employee any premiums paid on the employee's behalf, as long as the failure to return is not due to the employee's or family member's serious health condition or other circumstances beyond the control of the employee.

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Reinstatement

At the end of the FMLA leave period, an employee taking leave under this policy will be returned to the employee's same position, or to an equivalent position with equivalent pay benefits and other conditions of employment, as determined by CivicPlus.

Limitations

This policy is not intended to create any rights greater than those conferred on employees by the FMLA except as to the FMLA's geographical limitations.

4. MILITARY LEAVE

Overview

CivicPlus is committed to protecting the job rights of employees absent on military leave in accordance with federal and state law. An employee should provide CivicPlus with notice of the need for Military leave and a copy of the orders as far in advance as is reasonable under the circumstances. To request a military leave of absence, the employee should request a leave of absence through HR.

Eligibility

Employees taking part in a variety of military duties are covered under this policy. Such military duties include leaves of absence taken by members of the uniformed services, including active duty, reserve or National Guard, for training, periods of active military service and funeral honors duty, as well as time spent being examined to determine fitness to perform such service. This policy also covers individuals serving in the active components of the armed forces and the National Disaster Medical System (NDMS) as well as reservists for the Federal Emergency Management Agency (FEMA) when they are deployed to disasters and emergencies on behalf of FEMA.

Amount, Time Frame, and Duration

Employees on temporary or extended military leave may use up to six (6) weeks of consecutive paid Military leave.

To request a military leave of absence, the employee should obtain a request for leave of absence form from HR. Written notice is preferred, but not required under the law or this policy.

Six weeks or less Military Leave: employees are eligible for up to 6 weeks of paid Military Leave. If an employee will be out due to military service beyond six weeks, the employee will be separated from

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employment at the end of the six-week paid Military Leave. Upon return from military leave, the employee has the right to reemployment as stated by USERRA.

When the employee intends to return to work, he or she must make an application for reemployment to HR within the application period set as outlined in the Reinstatement section.

Reinstatement

Upon an employee's prompt application for reemployment, an employee will be reinstated to employment in the following manner depending upon the employee's period of military service:

Less than 91 days of military service – reinstated to a position that the employee would have attained if employment had not been interrupted by military service; or, if found not qualified for such position after reasonable efforts by CivicPlus, in the position in which the employee had been employed prior to military service.

More than 90 days and less than 5 years of military service – reinstated to a position that the employee would have attained if employment had not been interrupted by military service or a position of like seniority, status and pay, the duties of which the employee is qualified to perform; or, if proved not qualified after reasonable efforts by CivicPlus, in the position the employee left, or a position of like seniority, status and pay, the duties of which the employee is qualified to perform.

Exceptions of Reemployment: In addition to the employee's failure to apply for reemployment in a timely manner, an employee is not entitled to reinstatement as described above if any of the following conditions exist:

- CivicPlus' circumstances have changed as to make reemployment impossible or unreasonable.
- Reemployment would pose an undue hardship upon CivicPlus.
- The employee's employment prior to the military service was merely for a brief, non-recurrent period and there was no reasonable expectation that the employment would have continued indefinitely or for a significant period.
- The employee did not receive an honorable discharge from military service.

Benefits

If an employee is absent from work due to military service, benefits will continue as follows:

An employee on military leave may elect to continue group health insurance coverage for the employee and covered dependents under the same terms and conditions for a period not to exceed 6 weeks from the date the military leave begins. The employee must pay, per pay period, the premium normally paid by the employee. After the 6-week military leave, the employee and covered dependents can continue group health insurance through COBRA for up to 24 months.

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The group term life/AD&D, group long term disability insurance provided by CivicPlus, and voluntary supplemental life/AD&D insurance will not terminate the day the employee becomes active military.

5. PERSONAL LEAVE OF ABSENCE

An employee who is not eligible for FMLA or who has exhausted available FMLA may request a personal leave of absence for up to 8 weeks in any 12-month period when compelling personal reasons require a leave of absence, subject to CivicPlus's business needs.. Under extreme circumstances, personal leave may be extended for up to an additional 4 weeks. Personal leave may be paid or unpaid depending on the circumstances and the amount of leave exhausted previously.

Granting a Personal Leave of Absence is not automatic and will be subject to the business needs of CivicPlus. All personal leave of absence requests are submitted to the HR department and must be approved in advance, in writing, by the department manager and HR. Personal leave of absences must only be taken on a continuous basis.

CivicPlus will make reasonable efforts to place an employee returning from Personal Leave of Absence in the same or an equivalent position, but such placement is not guaranteed depending on the business needs of CivicPlus at the time of return.

An employee's failure to return to work at the conclusion of a Personal Leave of Absence may result in termination unless the employee is eligible for and has been granted a different leave.

6. OTHER LEAVES OF ABSENCE

Many states require that employers provide their employees with other leaves of absence, such as Reproductive Loss Event, Pregnancy Disability Leave, Bone Marrow Donation Leave and School Activities Leave. CivicPlus shall comply with all applicable federal, state, and local leave laws. Applicable state law will take precedence over this policy to the extent there is a conflict. Please check with HR for additional information.

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7. APPLICABLE TO ALL LEAVE OF ABSENCES OUTLINED ABOVE

Compensation

Overtime: Overtime earnings will not be considered hours worked for purposes of performing overtime calculations.

Voluntary/Involuntary Resignation: Upon termination of employment at CivicPlus, the individual will not be paid for any unused leave of absence for which they were eligible.

Commissions: to ensure fair and equitable compensation for employees on an approved leave of absence regarding commission earnings and to make necessary adjustments to sales quotas during their temporary absence.

Commission Earnings:

- Employees eligible for commission earnings will receive commission payments for deals closed in the employee's name/account/territory at the rates outlined in their compensation plan.
- Quota attainment will not be recognized for employees while on a leave of absence. Employees will be receiving a quota adjustment during this time. Therefore, any quota requirements or milestones achieved while the employee is on leave will not be factored into their compensation calculations.

Sales Quota Adjustment:

- To accommodate an employee on an approved leave of absence, it may be necessary to make adjustments to their sales quota. These adjustments should be fair and consistent, taking into account the employee's previous performance and responsibilities. Sales quotas for employees on leave will be prorated based on the duration of their leave of absence.
- The adjustment to the sales quota will be calculated on a pro-rata basis, considering the total quota for the period and the percentage of time the employee spent working.

Communication: The Sales Leader will communicate the commission and quota adjustment to the employee before the commencement of leave.

Notwithstanding the foregoing, CivicPlus is committed to compliance with all applicable laws and the policy set forth herein may be altered for such compliance, in CivicPlus' sole discretion.

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PAID TIME OFF POLICY: FLEXIBLE TIME OFF, SICK LEAVE, HOLIDAYS, BEREAVEMENT, JURY DUTY & VOTING

1. PURPOSE

CivicPlus employees are professionals with responsibilities to the company, to our internal and external customers and to themselves. Time away from work is beneficial, and all employees are encouraged to use it. This policy is based on mutual trust between employer and employee. It gives employees opportunities to work or take time off as they see fit, as long as they keep fulfilling their duties.

2. FLEXIBLE TIME OFF (FTO)

Flexible Time Off (FTO) should be used for vacation, rest and relaxation, personal business, emergencies, religious observances, schooling, inclement weather, personal reasons and additional extenuating circumstances.

FTO is available to regular full-time employees only. Because this benefit is used based on an employee's individual needs and their responsibilities to our customers and organization, no amount of time off is promised, guaranteed, vested or accrued. Therefore, employees who separate employment with CivicPlus will not be eligible for payout of any FTO. To uphold our commitment to the core value of work-life balance, employees are encouraged to use a minimum of 15 days of FTO in each rolling 12-month period, subject to the guidelines set forth herein.

Compensation is not reduced for using FTO, but the time off will not be counted as hours worked when computing overtime for nonexempt employees. Pay for FTO hours used is computed at the employee's current base rate at the time of use and will not include any other forms of compensation such as incentives, commissions, bonuses and overtime.

Procedure

- Whenever possible, all FTO should be scheduled and prearranged with management by the employee to minimize the disruption to normal operations by use their department's preferred method for requesting time off. Additionally, all requests must be placed in the Human Resource Information System ("HRIS") and approved prior to date(s) requested off.
- Time off lasting more than one week must be pre-approved by an employee's manager at least one month in advance whenever possible. CivicPlus encourages employees to communicate and collaborate with their team to avoid disrupting operations.
- Employees on approved leaves of absence, including Family and Medical Leaves, Parental Leave, and Disability Leave, should refer to the company's Leave of Absence policy for compensation information during these periods.

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- Non-exempt (hourly) employees may take FTO in full hour increments up to their scheduled hours per week. Total FTO hours taken in a pay period cannot exceed the employee's total standard hours per week as indicated on the employee's personnel record.
- Exempt (salaried) employees may take FTO hours in whole day increments only, and up to the employee's scheduled hours per week.
- FTO is intended to say thank you for your hard work and dedication to CivicPlus. However, if an employee's performance declines due to the abuse of this policy, CivicPlus reserves the right to review the employee's use of this policy and determine if disciplinary action or termination is appropriate.
- Excessive absences shall be considered an abuse of the policy and are defined as frequent or prolonged absences that impact team collaboration, performance, and/or operations. Regular unscheduled absences can disrupt team projects, hinder collaboration, and cause an imbalance of workload.

Managers may deny FTO requests if:

- Other team members with similar or complementary duties have already asked for leave during the same time.
- The requested time off coincides with a busy period or an important deadline for the employee asking for leave.
- An employee appears to abuse the policy. Managers must, use data from our leave tracking system and present employees' inadequate deliverables to substantiate their concerns. They may also arrange a meeting with the employees and HR to address the issue.

Managers cannot reject leave requests for any of the following reasons:

- To discipline employees.
- To force employees to fulfill duties that are not urgent.
- To approve leave for another employee who made a later request.

Neither list is exhaustive. Both employees and supervisors should use common sense and adhere to company policies when requesting/approving FTO. Effective communication between team members is vital to make this policy work for everyone.

3. SICK LEAVE

Part-time and full-time employees are eligible for a maximum of 48 hours (6 workdays) of paid Sick Leave per calendar year. All Sick Leave hours are fully accrued at the commencement of an employee's employment, and thereafter on January 1st of each calendar year.

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There is no waiting period to use accrued Sick Leave. All requests for usage of Sick Leave must be submitted through the HRIS.

Employees may use Sick Leave for the following: (1) diagnosis, care or treatments of an existing health condition, or the preventative care of an employee, or an employee's family member; (2) maternity or paternity leave and pregnancy disability leave; (3) when an employee or a member of the employee's family is a victim of domestic violence, sexual assault or stalking; (4) when a public health emergency causes closure of an employee's place of business or closure of the employee's child's school or place of care; (5) to attend a child's school-related conference, meeting, function or other event requested or required by a school administrator, teacher, or other professional staff member responsible for the employee's child's education, or to attend a meeting regarding care provided to the employee's child in connection with the child's health conditions or disability; and (6) any other reason allowed by law. Paid sick leave is also available for employees who are victims of domestic violence, sexual assault, or stalking.

Employees on approved leaves of absence, including Family and Medical Leaves, Parental Leave, and Disability Leave, should refer to the company's Leave of Absence policy for information on how Sick Leave runs concurrent with these situations.

Upon termination of employment, any accrued, but unused Sick Leave shall be paid out only if, and to the extent required by, applicable law in the employee's state of employment.

4. HOLIDAY PAY

CivicPlus observes the following company paid holidays for full time employees:

- New Year's Day
- Memorial Day
- Juneteenth
- Independence Day
- Labor Day
- Thanksgiving Day
- Friday after Thanksgiving
- Christmas Day
- Christmas Eve or the day after Christmas
- [Winter Flex](#)

If a holiday falls on a Saturday, the holiday will be observed on Friday. If a holiday falls on a Sunday, the holiday will be observed on Monday.

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Human Resources will post the approved holiday schedule at the beginning of each calendar year for employees to observe.

5. BEREAVEMENT LEAVE

CivicPlus offers Bereavement Leave to full-time and part-time employees after the loss of a loved one. An employee that wishes to take time off due to the death of a loved one should notify his or her manager and/or Human Resources as soon as reasonably possible.

Bereavement pay is calculated on the base pay rate of the employee at time of absence and will not include any other forms of compensation, such as incentives, commissions, bonuses and overtime.

Employees will receive up to five (5) days off with pay per occurrence without using FTO to attend the funeral, make arrangements, and/or deal with any family matters related to the death.

Pay for time off will be prorated for a part-time employee, if the funeral occurs on a scheduled workday.

CivicPlus recognizes that bereavement is a difficult life event, requiring time to grieve and fulfil family obligations. In the event more than five (5) days off is necessary, an employee may request additional time off that must be approved by their manager. Additional time off may be covered using FTO.

6. JURY DUTY

CivicPlus will pay employees their regular rate of pay for any absences to serve on jury duty.

For extended or lengthy trials, employees should consult with Human Resources and their manager regarding extended time away from work.

Upon receipt of notification from the state or federal courts of an obligation to serve on jury duty or act as a court witness, the employee should notify his/her manager and Human Resources immediately.

Employees appearing as a plaintiff, defendant, or for non-subpoenaed court appearance will not receive jury duty pay. FTO should be used for these instances.

Employees serving non-sequential days on jury duty must report for shifts scheduled to work when court is not in session.

If released from jury duty during the course of the day, the employee is expected to report to work as soon as possible.

CivicPlus recognizes that employees may have to appear in court for witness duty when subpoenaed to do so. Unless otherwise required by state or local law, employees will be granted flexible time off

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to appear in court as a witness when subpoenaed, if prior notice is given to the manager and Human Resources.

The employee will retain all jury duty pay from the court or the subpoena (including allowances).

7. TIME OFF TO VOTE

CivicPlus complies with all applicable state and municipal voting time laws. Contact Human Resources for further information or questions.

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PAYROLL, TIME, AND ATTENDANCE	

1. PURPOSE

We understand that compensation is an important component of working for CivicPlus. To ensure fair and consistent payroll practices, this policy outlines the steps needed to ensure all payroll is accurate to the best of CivicPlus' knowledge and complies with all federal and local labor laws. In addition, it outlines our expectations for attendance at work.

2. TIME RECORDS

All non-exempt employees are required to complete accurate weekly time reports showing actual time worked. These records are required by governmental regulations and are used to calculate regular, and overtime pay.

All employees are responsible for the accuracy and completeness of their timecards before payroll processing occurs. Any inaccurate information, time or payroll details should be corrected and reported to your manager and payroll immediately to ensure payroll is accurate or corrections are made in a timely fashion. Failure to meet these expectations will result in disciplinary action, up to and including termination.

In the event of processing errors or late submissions to payroll, the Payroll team will exercise discretion regarding when and how to make corrections. All corrections will be made in compliance with all federal, state, and local laws.

3. BREAKS

Managers are responsible for establishing break schedules and times for their departments. All break schedules and lunch times will be in compliance with federal, state and local laws and communicated upon hire and in conjunction with any scheduling changes.

Paid breaks are considered to be any time away from an employee's workstation that is at least 15 minutes and under 30 minutes. An unpaid lunch break should be at least 30 minutes and under 60 minutes and should allow the employee to step away from the workplace uninterrupted.

4. OVERTIME

Employees may be required to work overtime based on business needs. Overtime is defined as hours worked beyond 40 hours in a work week (Sunday through Saturday). Non-exempt employees will receive one and a half times their regular hourly rate for hours worked over 40 hours in a work week.

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PAYROLL, TIME, AND ATTENDANCE

Paid leave (holidays, FTO, bereavement time, and jury duty) does not count toward time worked. CivicPlus adheres to all state and federal overtime laws.

Approval for all overtime must be obtained in advance from your department manager. While unauthorized overtime will be compensated according to state and federal laws, failure to follow policy may result in disciplinary action, up to and including termination. Exempt staff do not receive overtime pay; their compensation is a set amount of pay or salary per pay period. It is the policy of CivicPlus to comply with requirements of the Fair Labor Standards Act (FLSA) in the treatment of salaried employees who are exempt from the minimum wage and overtime requirements of the FLSA.

Our policy prohibits making any deductions from an exempt employees' pay which would cause that employee to lose his or her exempt status. If you feel an improper deduction has been made, you must promptly report the improper deduction to [Human Resources](#). We will investigate the complaint and, if it is determined that the deduction was improper, we will reimburse the employee for the improper deduction. If it is determined that a deduction is improper, we will make good faith efforts to prevent making that deduction in the future.

5. PAYROLL SCHEDULE

CivicPlus pays its employees on a bi-weekly basis (26 pay periods per year). Pay dates are set for every other Friday. The pay periods cover time worked from Sunday through Saturday for two full weeks. [Payroll Calendar – Internal Knowledge Base \(IKB\)](#)

Payroll checks will be direct deposited into the employees' specified bank accounts. No live checks will be issued; therefore, it is imperative that all employees keep their bank details up to date in the HRIS system. If any payday falls on a banking holiday, paychecks will be deposited on the prior banking day whenever possible. The Human Resources team will communicate in advance of special pay dates.

Any pay increase, employee elected payroll deductions, or tax withholding changes will be effective at the beginning of the next pay period unless otherwise specifically stated.

6. ATTENDANCE

Employee attendance is important to completing tasks and to meeting the teams and customer expectations. Employees are expected to be a #TEAMPLAYER and be present when scheduled to fulfill our overall mission.

Each department develops specific scheduling based on the scope of services offered. Schedules can vary by department.

Where health issues are the cause of chronic absenteeism, employees may be eligible for [FMLA](#), [ADA](#) and/or a [personal leave of absence](#). Please contact Human Resources in this event.

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7. PRE-SCHEDULED TIME OFF

Time-off requests should be submitted two weeks prior to the requested time off. While every effort will be made to accommodate time off requests, approval is subject to the company's needs and the volume of requests. If a request is approved by management in advance, the absence is considered approved.

Employees must obtain approval from their manager before leaving early or arriving late during their scheduled workday. Employees who intend to arrive late or leave early during their scheduled workday must inform their manager in advance.

Departments that require certain staffing levels to meet our customers' needs may have further guidance and policy on this matter. Ensure that you understand your department manager's expectations for requesting time off.

8. ABSENCES

CivicPlus understands that not all circumstances can be foreseen or requested in advance. However, if an employee becomes unable to attend their workday without prior approval from their manager, it is essential to notify their manager as soon as possible.

To notify their managers, employees must use the preferred CivicPlus communication method. This could include email, slack messaging, or phone communication. It is crucial to provide accurate and timely information about the absence, including the reason for the absence and the anticipated duration of absence.

Employees are responsible for reporting their absence before their scheduled workday begins. Failure to notify their manager of their absence may result in disciplinary action, up to and including termination.

In cases where an employee is absent for an extended period or multiple times, it may be necessary to provide supporting documentation. This may include a medical note, police reports, or any other relevant documentation. The employee should communicate any required documentation to their manager in a timely manner. In case of an absence lasting more than one (1) workday, employees must notify their manager daily, but no later than two (2) hours before their scheduled workday.

When employee requests time off or an extended absence, they should follow the appropriate procedure outlined in their respective department's policy or guidelines. This may include submitting a formal request, providing sufficient notice, and obtaining necessary approvals.

It is the responsibility of employees to manage their attendance effectively and adhere to company policies and guidelines. This includes reporting absences promptly, requesting time off in advance whenever possible, and being available to work their scheduled shifts.

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Managers are responsible for monitoring and reviewing the attendance records of their employees. They should promptly respond to absence notifications, review the reasons for absences, and take appropriate action when necessary. Managers should also address any attendance-related concerns or performance issues with their employees.

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment.

9. JOB ABANDONMENT

Job abandonment is considered a “quit without notice “. Employees who fail to attend work for two consecutive days without notifying their manager will be considered as having abandoned their position. The resignation will be treated as a voluntary resignation of employment. The employee will be responsible for any outstanding obligations such as returning company property.

10. RELATED POLICIES

- [Code of Ethics](#)
- [Leave of Absence](#)
- [Bereavement Leave](#)
- [Flexible Time Off](#)
- [Sick Leave](#)
- [ADA](#)

In all events of the outlined policy, CivicPlus will comply with the applicable state law.

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REMOTE WORK

1. PURPOSE

CivicPlus is committed to helping employees face the demands of balancing work, family, and life-related issues by offering a remote-friendly work environment to employees. While a remote environment provides employees with increased flexibility with their work schedule, CivicPlus does expect employees to continue to meet expectations and productivity at no expense to quality output. This policy outlines guidelines around remote work, the approval process, and remote work expectations.

2. FLEXIBLE WORKING ARRANGEMENTS

More employees are committing to both partially and fully remote work environments at CivicPlus. The level of remote work remains up to the manager's discretion and will depend on the position, the needs of the business, and/or the employee's ability to work at one of CivicPlus' office locations. All remote employees must communicate with and abide by their managers' set working hours and communication expectations for employees regularly working remotely. Unless otherwise specified, employees are typically expected to work the regular work hours set by each office, country, and/or time zone.

However, we have seen for some positions and employee tenures, an in-office environment is more conducive to employee success. Therefore, some positions may be required to be in the office. For those employees who are approved for remote work, the expectation is that such employees must fully meet their position's expectations, which include areas such as productivity and responsiveness.

Employees interested in converting to part-time employment should speak to their manager about their reasons for moving into part-time employment. These requests will be reviewed and approved by the overseeing manager and department leaders and balanced with the operational requirements and impact on other employees in the department.

CivicPlus full-time employees who work remotely are expected to maintain a full work week consistent with their employment agreement and remain available and responsive during normal business hours. Working a second full-time job, or engaging in any outside employment, that interferes with the employee's CivicPlus job duties, work schedule, or causes a conflict with the normal business hours of CivicPlus or its customers is strictly prohibited.

CivicPlus reserves the right to terminate the remote work arrangement if the employee fails to comply with the terms of this policy or fails to meet their performance expectations.

3. LOCAL/DOMESTIC WORK GUIDELINES

Due to the remote work environment, CivicPlus understands employees may occasionally work from locations other than the employee's primary residence. CivicPlus requires transparency in long-term

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work arrangements for compliance purposes, and any such arrangement that extends beyond thirty (30) days must be reported to HR to ensure legal and tax compliance.

For employees who work domestically in differing states/provinces but still within your home country or visa-sponsored country, please email Human Resources to find out if there are any employment or tax ramifications in different legal jurisdictions, to determine whether CivicPlus can support employment in that location. Further, if any employee moves domestically, please update your home address in UKG by following the instructions in the [Moving to a New State IKB \(Internal Knowledge Base\) article](#) (to notify HR and Payroll teams) and notify the IT (Information Technology) team by emailing helpdesk@civicplus.com.

4. INTERNATIONAL/GLOBAL REMOTE WORK

For employees requesting to work internationally while traveling, please [review our Remote Work Guidelines and submit a remote work request](#) in every event prior to working outside of your domestic country. CivicPlus will support international remote work of this nature only on a temporary basis as a working holiday arrangement. In these cases, CivicPlus will support a flexible working arrangement for up to two weeks internationally. The remainder of the time spent needs to be used as flexible time off/vacation/holiday or unpaid leave depending on the corresponding Company's vacation policy in each country we are currently registered as an employer. The details of the arrangement, including but not limited to, adjusted working hours, regular check-ins, and use of equipment, need to be discussed and approved by your manager, the Director of Information Security, HR, and Legal at least two weeks in advance. The overall amount of time off is also up to the overseeing manager's discretion and needs to be submitted to UKG for approval. In no event will remote work be approved in any country that is on the sanctioned country list of the U.S. or the European Union.

While CivicPlus does want to support employees, CivicPlus is not sponsoring any visas or supporting extended work in countries where CivicPlus does not have a physical presence. Therefore, the amount of time spent working in another country is limited to two weeks per request. Employees who need to request time spent in another country for up to two weeks need to receive approval from their manager, HR, Legal, and IT, visibility, and to update company equipment preferences/access to reduce technical difficulties. Any additional time spent needs to be submitted as time off in UKG for manager approval. When submitting time off in UKG, please specify in the notes section what country you are traveling to. Keep in mind, that most of our HR and IT teams operate in US time zones so use discretion when submitting your requests to give our teams as much time as possible to prepare in advance.

We aspire to recruit from and support many locations, states, and even countries to work from but given employment, benefit, and tax considerations, please work closely with HR, IT, Legal, and Finance on any planned moves across state or country lines.

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We recognize there may be extenuating circumstances when an exception to the above policy may need to be requested. Exceptions requested will be reviewed and approved on a case-by-case basis.

5. SECURITY AND CONFIDENTIALITY

All employees of CivicPlus, regardless of the location of work, must take appropriate steps to secure CivicPlus information, such as using a secure network, ensuring that devices are password protected, and not sharing sensitive data with unauthorized parties.

6. LIABILITY

Keep in mind that CivicPlus assumes no liability for injuries occurring in the employee's approved alternate worksite outside of scheduled work hours. An employee injury or illness is compensable under CivicPlus' worker's compensation policy if it arises out of and in the course of employment, regardless of the location where the injury occurs. All employment benefits provided by CivicPlus will remain within the standard benefits program and not be altered due to employee international work arrangements.

Employees are responsible for setting up their workspace in a manner that ensures their safety and minimizes the risk of injury. CivicPlus may provide guidance on ergonomics and other safety considerations, but ultimately, the employee is solely responsible for ensuring a safe work environment. While CivicPlus complies with applicable workers' compensation laws, injuries that occur in an employee's alternate workspace due to the employee's failure to follow safety guidance or maintain a safe remote work environment may affect eligibility for benefits and/or result in further review.

7. COMPANY EQUIPMENT

Remote employees will receive the standard equipment set up to ensure efficient workflow and productivity. Company-issued equipment to an employee remains the property of CivicPlus. Any company-issued devices and equipment must be returned by the employee upon termination of employment. It is expected that employees will return all pieces of equipment in the same condition in which it was originally received, less any normal wear and tear, or documented defects that were logged by the employee through the IT department. The employee will be held liable for any missing or damaged equipment, as well as any compromise of confidential company data or information. Please notify the IT team if equipment is missing or damaged. CivicPlus reserves the right to pursue the full replacement cost for any unreturned or damaged equipment, and to take appropriate legal or collection actions if necessary.

Per the international/global work policy above, employees approved to temporarily work in another country must notify the IT department prior, so they are aware of the location of the company's

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equipment. The IT department may need to adjust access permissions if necessary while you are in the specified location. In addition, after the two weeks of approved time in a different country, the IT department will limit access to avoid additional work in the unregistered work location.

8. COMPENSATION AND WORK HOURS

CivicPlus will comply with all laws, and where supported by law, the employee's compensation, benefits, work status, and work responsibilities may be adjusted due to accommodations to support working remotely. Except where required by law, CivicPlus does not support increases in compensation or benefits due to working remotely.

When working remotely, employees are expected to maintain their regular work schedule and be fully available during those hours for collaboration and meetings. Any deviation must be prior approved by management. Employees will be expected to perform their work during normal operational hours unless otherwise agreed in writing. If an hourly employee works remotely for the day, it is their responsibility to ensure their timesheet is accurate. Remote employees must stay in regular communication with their managers and coworkers. This includes responding to emails and messages in a timely manner and participating in scheduled meetings and calls. Unexcused tardiness to meetings and absences is not tolerated in the same fashion as though the employee worked in the office.

9. EXPECTATIONS

Although many employees are working remotely, CivicPlus expects employees to continue meeting their position's expectations, while also remaining professional and demonstrating CivicPlus' core values amongst leaders, customers, and peers.

- Living our Balanced value means supporting flexibility while sustaining high performance. To help you stay focused and connected while working remotely, we encourage making dependable care arrangements for children, elders, or others who rely on you—similar to expectations when working on-site.
 - We understand that life doesn't always go as planned. If an unexpected caregiving need arises, just keep your manager informed so we can work together to adjust as needed.
 - If caregiving responsibilities consistently overlap with your core work hours, please start the conversation early. We'll explore schedule adjustments, leave options, or other flexible approaches that support both your personal responsibilities and team commitments.
- Give yourself a routine and schedule your breaks, just like you do when working in the office. Do not work during meals or breaks.
- Work your expected hours set by your manager, even if it is in different time zones.

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- When communicating with employees in various time zones, try to avoid Slack messages outside of their core working hours. Try utilizing the “send later” function for important messaging. Employees can also set their Slack to “do not disturb” or “away” for a period. We want to be mindful of everyone’s various work schedules.
- Employees are expected to establish a dedicated workspace at home that is as free as possible from distractions and interruptions. During work hours, the employee should minimize background noise and avoid non-work interactions that could disrupt their focus or meetings. We expect all employees to maintain a safe, secure, and ergonomic work environment; comply with all applicable workplace safety rules, policies, and instructions; and report work-related injuries to the Company immediately.
- In the US, employees are protected by the Company's workers' compensation insurance. As such, employees are required to immediately report any injuries that occur while working.

Be advised that CivicPlus reserves the right to change or terminate remote-working arrangements or remote-working expectations at any time, without cause or advance notice. An employee's ability to work remotely rests in the sole discretion of the Company.

All employees, regardless of work arrangement, are expected to follow all CivicPlus employment policies. Failure to follow any CivicPlus policy may result in discipline (up to and including termination of employment) and/or termination of any remote-work arrangement.

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RULES OF BEHAVIOR

1. PURPOSE

Rules of Behavior describe security controls associated with user responsibilities and certain expectations of behavior for following security policies, standards, and procedures. Security Control Planning (PL)-4 requires Cloud Service Providers (CSP) to implement Rules of Behavior. It is often the case that different Rules of Behavior apply to internal and external users. Internal users are employees of our organization, including contractors. External users are anyone who has access to a system that we own that is not one of your employees or contractors. External users might be customers or partners, or customer prospects that have been issued demo accounts.

CivicPlus employees who access the CivicPlus information systems agree to the Internal Rules of Behavior. If CivicPlus provisions accounts for customers, including management accounts, it is CivicPlus responsibility to ensure that whomever CivicPlus provisions an account to agree to the External Rules of Behavior outlined under CivicPlus.com [Terms of Use](#). If CivicPlus provisions a management account to an individual customer, and then that manager in turn provisions subsequent customer accounts, it is the responsibility of the customer manager to ensure that users that he/she has provisioned agree to the CivicPlus provided Rules of Behavior outlined under CivicPlus.com Terms of Use.

2. RULES OF BEHAVIOR FOR INTERNAL USERS

- You must comply with copyright and licenses of proprietary software.
- You must process only data that pertains to official business and is authorized to be processed on the system.
- You must report all security incidents or suspected incidents to the IT department at helpdesk@civicplus.com.
- You must report any and all suspicious behavior, whether in person or in shared systems, to your CivicPlus manager immediately.
- You must discontinue use of any system resources that show signs of being infected by a virus or other malware and report the suspected incident to the IT Department at helpdesk@civicplus.com.
- You must challenge unauthorized personnel that appear in your work area.
- You must use only the CivicPlus data for which you have been granted authorization.
- You must notify your CivicPlus manager if access to system resources is beyond that which is required to perform your job.
- You must attend computer security awareness and privacy training as requested by CivicPlus.
- You must coordinate your user access requirements, and user access parameters, with your CivicPlus manager.

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RULES OF BEHAVIOR

- You must ensure that access to application-specific sensitive data is appropriate based on your job function.
- You must safeguard resources against waste, loss, abuse, unauthorized users, and misappropriation.
- You must ensure that access is assigned based on your CivicPlus manager's approval.
- You must familiarize yourself with any special requirements for accessing, protecting, and utilizing data, including Privacy Act requirements, copyright requirements, and procurement of sensitive data.
- You must ensure electronic official records (including attachments) are stored according to CivicPlus policy and standards.
- You must not use social media/networking sites to post organizational information on public websites.
- You must ensure that sensitive, confidential, and proprietary information, including, but not limited to, information sent to a fax or printer, is handled in a secure manner, e.g., cover sheet to contain statement that information being faxed is Confidential and Proprietary, For Company Use Only, etc.
- You must ensure that hard copies of Confidential and Proprietary information is destroyed (after it is no longer needed) commensurate with the sensitivity of the data.
- You must ensure that Confidential and Proprietary information, including information protected by Non-Disclosure Agreements (NDA) is protected against unauthorized access using encryption, according to CivicPlus standards, when sending it via electronic means (telecommunications networks, e-mail, and/or facsimile).
- You must not install CivicPlus unapproved software onto the system. Only CivicPlus designated personnel are authorized to load software.
- You must not add additional hardware or peripheral devices to the system. Only designated personnel can direct the installation of hardware on the system.
- You must not reconfigure hardware or software on any CivicPlus systems, networks, or interfaces.
- You must follow all CivicPlus wireless access policies.
- You must not retrieve information for someone who does not have authority to access that information.
- You must not remove computer resources from the facility without prior approval. Resources may only be removed for official use.
- You must not store customer information on a system that is not owned by CivicPlus.
- You must ensure that sensitive information entered into systems is restricted to team members on a need-to-know basis.

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- You understand that any person who obtains information from a computer connected to the Internet in violation of his or her employer’s computer-use restrictions is in violation of the Computer Fraud and Abuse Act.
- You must not share accounts with other individuals or departments. Authentication and identification of all organizational accounts must be compliant with NIST defined policies.

3. ACCEPTANCE

I have read the above Rules of Behavior for Internal Users for CivicPlus systems and networks. I acknowledge and agree that my access to all CivicPlus systems and networks is covered by, and subject to, such Rules. Further, I acknowledge and accept that any violation by me of these Rules may subject me to civil and/or criminal actions and that CivicPlus retains the right, at its sole discretion, to terminate, cancel or suspend my access rights to the CivicPlus systems at any time, without notice.

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Human Resources

SAFETY, SECURITY, WORKERS' COMPENSATION, AND WEAPON-FREE WORKPLACE

1. PURPOSE

The safety and security of our employees is our number one concern. CivicPlus expects that all employees will share the responsibility for safety and security of themselves, fellow employees, and visitors.

2. POLICY

CivicPlus seeks to minimize the risks to its employees and expects employees to act responsibly by:

- Complying with Federal, State and Local regulations
- Encouraging safety and security practices among peers
- Reporting safety hazards to the HR department as soon as you see them
- Reporting on-the-job accidents in a timely manner (within 12 hours of the accident)
- Seeking the assistance of the Employee Assistance Program (EAP) in dealing with counseling and coping situations
- Being aware of potentially violent situations, remain conscientious of their surroundings at all times, and report suspicious behavior immediately

3. SECURITY

Manhattan, KS (Headquarters)

- The main entrance to the CivicPlus portion of the building will be unlocked from 7:30 AM to 5:30 PM, Monday-Friday. Outside of those hours and on weekends, staff are required to use their CivicPlus issued key fob to gain access to the building.

Durham, NC Office

- The main entrance to the building will be unlocked from 7:00 AM to 6:00 PM, Monday-Friday. Outside of those hours and on weekends, staff are required to use their CivicPlus issued key fob to gain access to the building.

Tallahassee Office

- The main entrance to the building is locked at all times. Staff are required to use their CivicPlus issued key fob to gain access to the building.

4. VISITOR PROCEDURES

- Employees should not allow anyone to gain entrance into any CivicPlus office without ensuring they are a CivicPlus employee. If someone is not an employee and is trying to gain entrance to the building, employees should instruct the visitors to follow the visitor procedures.

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SAFETY, SECURITY, WORKERS' COMPENSATION, AND WEAPON-FREE WORKPLACE

- Employees will need to meet all visitors in the designated lobby of each office. All visitors to CivicPlus will be instructed to remain in the lobby area and wait until someone from CP can accompany them to their destination.
- Vendors and third-party contractors will be instructed to use the visitor procedures as posted at each office location.
- Employees wishing to have food delivered on site should instruct all deliveries to remain in the designated waiting areas where a CP employee will meet them to pick the order up.

If, for any reason, an employee has an exception to the procedure above, they are encouraged to speak to a member of the Human Resources team.

5. WEAPON-FREE WORKPLACE

To ensure that CivicPlus maintains a workplace safe and free of violence for all employees, the company prohibits the possession or use of dangerous weapons on company property.

All CivicPlus workers are subject to this provision, including contract workers and temporary employees as well as visitors and customers on company property. A license to carry the weapon on company property does not supersede company policy. Any employee in violation of this policy will be subject to disciplinary action, up to and including termination.

“Dangerous weapons” include firearms, explosives, knives and other weapons that might be considered dangerous or that could cause harm. Employees are responsible for making sure that any item possessed by the employee is not prohibited by this policy.

CivicPlus reserves the right at any time and at its discretion to search all company-owned or leased vehicles and all vehicles, packages, containers, briefcases, purses, lockers, desks, enclosures and persons entering its property for the purpose of determining whether any weapon is being, or has been, brought onto its property or premises in violation of this policy. Employees who fail or refuse to promptly permit a search under this policy will be subject to discipline up to and including termination.

6. WORK RELATED HAZARDS AND INJURIES

Each office location should have either a posted emergency plan detailing procedures or conducted an annual or bi-annual drill in dealing with emergencies such as:

- Fire
- Weather emergencies
- Workplace violence/Active shooter

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7. WORKERS' COMPENSATION BENEFITS

If an employee sustains a work-related injury or illness, the employee must report the injury/illness to the Human Resources Business Partner within 24 hours of the incident. In case of an emergency, you should go to the nearest hospital emergency room for treatment.

Failure to report work related incidents could result in a delay in and/or denial of injury/accident coverage under Worker’s Compensation. Any claim for an injury or illness caused by an employee’s willful misconduct, alcohol, or drug usage or that occurred during the employee’s voluntary participation in any off-duty recreational, social, or athletic activity sponsored by CivicPlus will not be compensable under Workers’ Compensation. If you have questions regarding your rights and benefits under Workers’ Compensation, please contact Human Resources.

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SOCIAL MEDIA

1. PURPOSE

At CivicPlus, we understand that social media can be a fun and rewarding way to share your life and opinions with family, friends, and co-workers around the world. However, the 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 these guidelines for appropriate use of social media. The following policy applies to all CivicPlus employees and has been developed to help empower our employees to participate in this form of marketing and communication, represent our company, and share the optimistic and positive spirit of our brand.

2. GUIDELINES

In the rapidly expanding world of electronic communication, social media can mean many things. Social media includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else's web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or a chat room, whether or not associated or affiliated with CivicPlus, as well as any other form of electronic communication.

In order to ensure that the CivicPlus and its employees adhere to their ethical and legal obligations, employees are required to comply with CivicPlus' Social Media Policy. The intent of this Policy is not to restrict the flow of useful and appropriate information, but to minimize the risk to CivicPlus' and its employees. All social media accounts representing CivicPlus must be approved through the Marketing and HR departments. The restrictions of this policy are not intended, and should not be interpreted, to restrict protected communications.

To maintain CivicPlus' reputation the following subjects may not be discussed by employees in any form of social media:

- Company confidential or proprietary information
- Confidential or proprietary information of clients, partners, vendors, and suppliers
- Embargoed information such as launch dates, release dates, and pending reorganizations
- Company intellectual property such as drawings, designs, software, ideas and innovation
- Disparagement of company's or competitors' products, services, executive leadership, employees, strategy and business prospects.

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This list is not exhaustive. Any employee who violates this policy and such action is deemed inappropriate, in the judgment of CivicPlus, may be subject to discipline up to and including termination.

The same principles and guidelines found in CivicPlus' core values also apply to your activities online.

- Impactful – Passionately strive to bring our company vision to life
- Team Player – Commitment to work as one to achieve a common goal
- Trustworthy – Honest, ethical and actively pursuing truth
- Innovative – Approach situations with a creative mindset to solve problems and discover a new path forward
- Balanced – Aspire to be our best selves by pursuing "work-life" and "work-laugh" harmony

CivicPlus encourages all of its employees to explore and engage in social media communities at a level which they feel comfortable. **Have fun, but be smart.** The best advice is to approach online worlds in the same way we do the physical one – by using sound judgement and common sense, by adhering to our company's core values, and by following all other applicable policies.

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TALENT ACQUISITION

1. PURPOSE

At CivicPlus, we are committed to building a diverse and inclusive workforce while ensuring a fair, transparent, and compliant recruiting process. To achieve this, the Talent Acquisition Team has crafted the following comprehensive policy. This policy aims to establish clear guidelines for both candidates and Hiring Managers, fostering a consistent, equitable, and efficient recruitment process.

2. CANDIDATE REQUIRED TESTING

Background Check

Prospective employees will complete the background check authorization information through the employment screening service for processing. A designated CivicPlus representative will review all results.

The CivicPlus representative will notify the hiring manager regarding the results of the check. In instances where negative or incomplete information is obtained, the appropriate management and the Vice President of Human Resources will assess the potential risks and liabilities related to the job's requirements and determine whether the individual should be hired. If a decision not to hire a candidate is made based on the results of a background check, there may be certain additional Fair Credit Reporting Act (FCRA) requirements that will be handled by Human Resources in conjunction with the employment screening service (if applicable).

Background checks may include:

- **Social Security Verification:** validates the applicant's Social Security number, date of birth, and former addresses.
- **Criminal History:** includes a **review of criminal convictions and probation.** CivicPlus will evaluate criminal history information in accordance with applicable federal, state, and local laws, including any applicable ban-the-box or fair chance hiring laws. **The following factors may be considered for applicants with a criminal history:**
 - The nature of the crime and its relationship to the position.
 - The time since the conviction.
 - The number (if more than one) of convictions.
 - Whether hiring, transferring, or promoting the applicant would pose an unreasonable risk to the business, its employees or its customers and vendors.
- **Motor Vehicle Records:** provides a report on an individual's driving history in the state requested. This search will be run when driving is an essential position requirement.

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CivicPlus does not review or consider candidates' personal social media profiles as part of the hiring or background check process. Reviewing social media posts may expose the Company to protected class information (e.g., race, religion, disability, political affiliation) that cannot be legally considered in employment decisions. To mitigate risk of bias or discrimination claims, CivicPlus prohibits the use of personal social media content in employment screening.

Violation of this Policy

If an individual violates this policy, the consequences are as follows:

- Prospective employees who refuse to cooperate in background checks will not be hired at that time, and their offer of employment will be rescinded. All background investigations will be reviewed case-by-case with the Vice President of Human Resources.

Confidentiality

Background investigation result reports are private and confidential information and will be kept confidential and maintained in secure files to the extent required by law.

Work Authorization

Candidates applying for positions within CivicPlus must be authorized to work in the country in which they are applying. They will be required to provide valid proof of work authorization and any necessary work visas or permits during the hiring process.

3. MANAGERS FOCUSED ON DIVERSE AND INCLUSIVE HIRING PRACTICES

Recruitment Process

To ensure consistency across all interviews, external applicants must complete the same recruitment steps: application submission via the applicant tracking system, initial screening to verify qualifications, an interview project assessing relevant skills and submitted on time, and a panel interview with diverse stakeholders to evaluate technical skills, cultural fit, and alignment with organizational values. If any alterations to this process are needed, please consult with the Talent Acquisition team.

Diverse Interview Panel

To promote diversity and inclusivity in our hiring process, managers are encouraged to form diverse interview panels for each candidate. The interview panel should consist of employees from different backgrounds and perspectives, representing various roles and levels within the organization. The diversity of the interview panel will help in mitigating unconscious biases and foster a fair evaluation of candidates.

Updated: June 2025	Reviewed: July 2025
Policy Owner: Director of Human Resources	

	CivicPlus Policy and Procedures Human Resources
TALENT ACQUISITION	

Using Scorecards and Evaluation Forms

Managers are highly encouraged to utilize structured interview scorecards during candidate evaluations. The scorecards will provide a consistent and objective way of assessing each candidate's qualifications, skills, and cultural add. Scorecards should be designed to assess specific job-related competencies and align with the organization's core values using behavioral based question. An evaluation form within the Applicant Tracking System is required for all interviews, including but not limited to Hiring Manager Interviews, Panel Interviews, Team Meet & Greets, and Internal Panel Interviews.

Feedback to Talent Acquisition (TA) within 24 Hours

After conducting interviews, managers are expected to provide timely feedback to the Talent Acquisition team within 24 hours. This feedback should include the assessment of the candidate's performance, strengths, areas of improvement, and overall suitability for the role. Efficient feedback sharing will help expedite the hiring process and create a positive candidate experience. The Hiring Manager and panel members are recommended to use the required Evaluation form within the Applicant Tracking System for feedback.

Compliance

All hiring managers and employees involved in the hiring process must adhere to local labor laws and regulations related to recruitment and employment practices. They should also follow CivicPlus' policies on equal opportunity and anti-discrimination.

CivicPlus is committed to providing equal employment opportunities to all qualified individuals and will make reasonable accommodations for individuals with disabilities during the recruiting and hiring process. If an accommodation is required, Talent Acquisition will make appropriate arrangements.

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Policy Owner: Director of Human Resources	

	CivicPlus Policy and Procedures Human Resources
TRAVEL & EXPENSE	

1. PURPOSE

It is an employee expectation to follow the travel and expense policy, including timely and accurate completion of expense reporting. Employees must use reasonable discretion when incurring expenses on behalf of the company.

2. TRAVEL POLICY

We are grateful for the travel employees conduct on the company's behalf and want employees to have safe and comfortable travels. Employees should balance convenience and comfort with cost when traveling on behalf of the company. All business travel arrangements must be booked through our Travel Management Solution, [Navan](#).

Flights

- Book flights at least 14 days before departure
- Book Coach/Economy class
- Book the best deal available with consideration to both expense and time
 - When feasible the least expensive flight should be booked
 - One-stop or non-stop flights may be selected if the alternative would disrupt business
- Do not select trip insurance or preferred seating that generates an additional expense
- Baggage fees will be reimbursed for the first bag checked, if applicable.

Hotel

- Book a reasonably priced hotel for the region
- If attending an event where the host hotel attendee rate is less expensive, the hotel can be booked outside of Navan.
- Avoid using hotel phones unless an emergency
- Navan provides an estimated hotel receipt. If additional charges are incurred during your stay, an itemized receipt is required.

Rental Car

- Rental cars are intended for business travel only. Personal trips should not be taken with a company rental.
- Book economy or mid-size vehicles
 - If the larger vehicle happens to cost less the employee should select the best rate
 - Otherwise, full size, van, SUV or specialty rentals require prior approval from manager

Updated: July 2024	Reviewed: July 2025
Policy Owner: Accounting	



CivicPlus Policy and Procedures Human Resources

TRAVEL & EXPENSE

- Let the rates offered determine which rental car company to utilize
- Our negotiated rates with Hertz (Business Rewards number 1753636) and Enterprise/National (Business Account number XZ51Q15) are preloaded into Navan.
- An employee involved in an accident while using a rental car must notify his or her manager immediately. A copy of the accident report and pictures of the damage should be retrieved by the employee and sent to the manager as well.

Ground Transportation

- Take advantage of free shuttles to and from airports and hotels when available
- Consider using a taxi, shuttle service, or an Uber/Lyft service as an alternate to a rental car. Select the option that makes the most financial and business sense for each trip.
- Safe driving is expected. Use of hand-held cell phones while operating a vehicle is strongly discouraged. Hands-free devices are permitted. Texting, instant messaging, and responding to or sending emails is not permitted.

Parking

- Parking fees associated with business travel at airports and on-site will be reimbursed.
- Consider alternate transportation to the airport, such as Uber, Lyft, or a taxi, and choose the most reasonable option to avoid excessive parking fees.
- Utilize long-term parking and other satellite parking options when the trip is more than two consecutive days.

Mileage

- When a personal vehicle is used for work-related travel, the standard IRS mileage rate will be paid.
- If the trip exceeds 150 miles one-way, a rental car should be used.
- Please note that CivicPlus insurance coverage does not extend to personal vehicles used for work-related travel.

Meals

- Overnight business travel: up to \$65 per day for **consumable items** will be reimbursed.
- Day business travel: if trip is at least 30 miles from employee's office or extends the workday by at least 3 hours, use best judgment if a meal is warranted.
- All meal attendees must be included when reporting the expense.
- As a rule, a tip should not exceed 20 percent.

Updated: July 2024

Reviewed: July 2025

Policy Owner: Accounting

	CivicPlus Policy and Procedures Human Resources
TRAVEL & EXPENSE	

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| <p>Travel Memberships</p> | <ul style="list-style-type: none"> • Enrollment in travel memberships and loyalty programs are allowed but will not be paid for by the company. • Employees may use the rewards for personal use. • Membership accounts can be stored in the employee's Navan profile. • Participation in such programs must not influence the flight, hotel, or rental car selection that would result in an increased cost to CivicPlus. |
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| <p>Non-Reimbursed Travel Items</p> | <ul style="list-style-type: none"> • Travel or trip insurance, towing expenses, parking tickets, motor vehicle violations, travel memberships and loyalty program fees, preferred seating (unless documented necessity with HR or if only seat remaining for a business required flight – must be documented), non-consumable items, meals that do not directly relate to a company trip/event, groceries purchased in home location, gym fees, tobacco products, bulk alcohol purchases while traveling, medicine, child care or pet boarding, or expenses associated with extending a business trip for personal travel • If an employee violates the travel or expense policy, the Company reserves the right to review the employee's use of either policy and determine if discipline or termination is appropriate. |
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3. EXPENSE POLICY

Employees may claim and be reimbursed for all reasonable and authorized expenses that are incurred while doing business on behalf of CivicPlus. The following guidelines should be observed and followed for that purpose:

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| <p>Corporate Credit Card</p> | <ul style="list-style-type: none"> • Employees in positions that require travel will be issued, and must use, a corporate credit card when conducting business for the company. • Expenses incurred on the company credit card will be reported and managed through Navan, a third-party expense reporting tool used by the company. • Employees must maintain receipts for all transactions. • If a receipt is missing, a missing receipt affidavit and explanation of the expense must be provided. |
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Updated: July 2024	Reviewed: July 2025
Policy Owner: Accounting	

	CivicPlus Policy and Procedures Human Resources
TRAVEL & EXPENSE	

	• Employees with consistent patterns of missing receipts will be managed on an individual basis. • It is the employee's responsibility to review and reconcile expenses in Navan timely to ensure accurate expense reporting.
Personal Credit Card	• Employees in positions that do not require routine travel may use their personal credit card for approved company trips and expense reimbursements. • Expense receipts and documentation will be submitted through Navan for reimbursement. • All expenses <u>must have a receipt and be submitted within 30 days of the transaction</u> to receive reimbursement for the expense. • Reimbursement will be paid by direct deposit weekly through Navan, subject to when the expense was approved through Navan by employee's manager.
Lost/Stolen Card, Accidental Charges	• Employees must immediately suspend/cancel card in Navan and notify the Accounting department and their manager of a lost or stolen corporate credit card. • Any accidental charges must be noted within Navan, these charges will be requested for reimbursement through Navan by means of a linked personal credit card.

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Policy Owner: Accounting	

	CivicPlus Policy and Procedures Human Resources
WHISTLEBLOWER POLICY	

1. PURPOSE

The purpose of this Whistleblower Policy is to encourage and enable employees to raise concerns about possible violations of laws, regulations, company policies, or ethical standards without fear of retaliation. This policy aims to create an environment where employees feel comfortable reporting concerns and where those concerns are addressed promptly and appropriately. CivicPlus provides engagement solutions aimed at making government work better and becomes a leader in the GovTech space by building trust with our customers. Our employees are the first line of defense to hold the company accountable and trustworthy and this Policy aims to provide our employees the comfort needed to report their concerns.

2. WHO IS COVERED BY THIS POLICY?

This policy applies to all employees, contractors, and stakeholders of CivicPlus, whether working in-office or remotely. It covers any concerns related to illegal activities, unethical behavior, fraud, corruption, or violations of company policies or regulations.

3. REPORTING PROCEDURE

Employees are encouraged to report concerns through the following channels:

- [Anonymous Tip Form](#)
- **Direct Reporting:** Employees may also report concerns directly to their manager, Human Resources, the Legal team, or any member of the LT/ELT, as the employee feels comfortable.

4. CONFIDENTIALITY AND ANONYMITY

All reports made under this policy will be treated with the utmost confidentiality to the extent possible and permitted by law. Employees have the option to report concerns anonymously through the anonymous tip form. However, if an employee chooses to identify themselves when making a report, their identity will be protected to the fullest extent possible.

5. NON-RETALIATION

CivicPlus prohibits any form of retaliation against individuals who, in good faith, report concerns or participate in an investigation under this policy. Retaliation against whistleblowers is strictly prohibited and will result in disciplinary action, up to and including termination of employment.

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WHISTLEBLOWER POLICY	

6. PROTECTION FROM LEGAL ACTION

Employees who report concerns in good faith are protected from civil and criminal liability under applicable whistleblower protection laws. Further, CivicPlus recognizes that reporting concerns is difficult for employees; however, it is a core value of CivicPlus to be #trustworthy and be willing to have the difficult conversations.

7. INVESTIGATION PROCESS

Upon receiving a report, CivicPlus will promptly investigate the concerns raised. The investigation will be conducted impartially and with due regard for the confidentiality of all parties involved. Employees may be asked to provide additional information or assistance during the investigation process.

8. RESOLUTION AND CORRECTIVE ACTION

Upon completion of the investigation, appropriate action will be taken to address any confirmed violations or concerns. This may include acknowledgement of report and explanation of no action necessary, disciplinary action, corrective measures, or changes to company policies or procedures to prevent future occurrences.

9. COMPLIANCE AND OVERSIGHT

This Whistleblower Policy will be reviewed periodically to ensure its effectiveness and compliance with relevant laws and regulations. The CivicPlus HR and Legal team, or an appointed committee, as growth may require, will oversee the implementation and enforcement of this policy.

10. TRAINING AND AWARENESS

CivicPlus will provide training and awareness programs to all employees to educate them about this Whistleblower Policy and their rights and responsibilities under it.

11. CONTACT INFORMATION

For any questions or concerns about this Whistleblower Policy, employees may contact Human Resources.

CivicPlus is committed to fostering a culture of integrity, transparency, and accountability. We encourage all employees to speak up if they become aware of any behavior that may violate our values or standards. Your contributions to maintaining a safe and ethical work environment are valued and appreciated.

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Policy Owner: Legal Team	