



## The SHT Legal Services Policy & Ethics Code

SHT Legal Services has a core set of values which are fundamental to the organisation's development and success. One of these values is **Integrity** which means that **we can always be trusted to do the right thing**. The Ethics Code below, which forms part of the Group's wider Business Ethics Policy, sets out how we expect all our employees to behave in order to live this core value.

Being Safe and Secure	Be Honest and Trustworthy	Being Fair and Considerate	Being Professional and Proud
<b>DILIGENCE</b>	<b>EQUALITY</b>	<b>SERVICE</b>	<b>PROTECTION</b>
<ul style="list-style-type: none"> <li>Putting health &amp; safety first</li> <li>Protecting the security of our customers, the public and those in our care</li> <li>Carefully following company rules and procedures</li> </ul>	<ul style="list-style-type: none"> <li>Always following the law</li> <li>Reporting any wrongdoing</li> <li>Never offering or taking a bribe</li> <li>Avoiding any conflict of interest</li> <li>Being open and honest with customers, colleagues and other with whom we deal</li> </ul>	<ul style="list-style-type: none"> <li>Showing respect and considerations for others</li> <li>Treating people fairly</li> <li>Considering our local communities</li> <li>Respecting the environment</li> </ul>	<ul style="list-style-type: none"> <li>Doing the best job you can</li> <li>Looking smart and behaving professionally</li> <li>Being a good role model</li> <li>Safeguarding and promoting the SHT Legal Services name</li> </ul>

This Ethics Code sets out the behaviors that all employees are expected to demonstrate as they carry out their work. SHT Legal Services is committed to high ethical standards to maintain the integrity of our organisation, which means that:

- We are completely opposed to bribery and corruption in any form
- No employee can accept money, gifts or inducements from others trying to influence them to perform their work improperly
- No employee can offer money, gifts or inducements in order to persuade others to act improperly, whether for the advantage of SHT Legal Services or the employee concerned
- No employee can offer money, gifts or inducements to public officials to persuade them to perform their functions more quickly or at all – unless such payments are permitted or required by written law.

Any breaches of these requirements could result in disciplinary action, including immediate dismissal.

Employees must report any wrongdoing that breaches the SHT Legal Services Ethics Code to their manager through the company's or region's confidential hotline. Managers or supervisors who receive such a report from an employee must contact the Chief Compliance Officer or the hotline. If the wrongdoing relates to a very serious or sensitive matter which cannot be dealt with at country or regional level, contact the Group's confidential hotline telephone number so that an appropriate investigation can be carried out.

I confirm that I have read and understood the SHT Legal Services Ethics Code.

## Electronic Communications Policy

By signing or initialing below, you acknowledge that you have been provided electronic access to or received, read, and fully understand SHT Legal Services - (SHT)'s policy on Electronic Communications. You understand that the Company's electronic communications systems are to be used for company business and that excessive use of electronic communications systems for the conduct of personal business is strictly prohibited. You understand that SHT Legal Services - (SHT) has the right to access, review, and disclose information obtained through its electronic communications systems at any time, with or without advance notice. Further, you understand that SHT Legal Services - (SHT) employees have no reasonable expectation of privacy in electronic communications. You understand you are not permitted to use another person's password or disclose anyone's password, including your own, to anyone else, and you agree to fully comply with this policy.

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Original-On-site File Copy-Accounting Copy-Resident



**Scope and Purpose**

In order to allow its employees to perform their jobs as efficiently and effectively as possible and to facilitate business, SHT Legal Services - (SHT) has installed and maintains various electronic communications systems in the workplace. These include, but are not limited to, telephones, voice mail systems, personal computers, video conferencing systems, application and database servers, optical storage archival and retrieval systems, high speed local area network (LAN) systems, dedicated wide area network (WAN) systems, electronic mail, Electronic Data Interchange (EDI), Intranets, Extranets, electronic bulletin boards, facsimile services, commercial or non-commercial Internet services, Internet access via direct high-speed dedicated lines, via modem, or other device, and other company provided equipment, collectively referred to as "electronic communications." This document sets forth the company's policies regarding the use of its electronic communications in the workplace. All SHT Legal Services - (SHT) employees and agents of the company are expected to comply with the expectations and guidelines outlined in this policy.

**Policy**

The electronic communications systems made available to SHT Legal Services - (SHT) employees are provided for the efficient completion of work-related assignments and remain company property. Therefore, while occasional and very minor personal use of SHT Legal Services - (SHT) electronic communications systems may be tolerated from time to time, such communications are to be used to conduct company business.

**Responsibility**

Field management is responsible for ensuring that each employee reads this policy and signs Consolidated Acknowledgement and Consent Form, on a yearly basis. The acknowledgment form is to be filed in the employee's personnel file. Furthermore, it is the responsibility of the manager to ensure that all new hires receive this policy and sign the attached acknowledgement form prior to assuming their duties, and that the form is filed in the employee's personnel file.

It is the responsibility of Corporate Human Resources to provide access to this policy to all Headquarters employees and to ensure that it is signed by all overhead personnel on a yearly basis and appropriately filed.

The Information Technology Department at Headquarters is responsible for authenticating need and granting access to company computers when such need exists due to the absence of the person having a password for the computer. Such access will be granted only upon the written request of the individual's Department Head or senior field manager, as appropriate.

All SHT Legal Services - (SHT) employees are expected to comply in full with this policy. Violating this policy may result in disciplinary action up to and including termination of employment.

**Privacy in Communications**

All employees and agents of the company must recognize that computer files and data contained on company supplied personal computer hard disks, network servers hard disks, optical disks, floppy disks, ZIP disks, and JAZ drives, e-mail messages and file attachments, voice mail messages, LAN/WAN access, company supplied Internet access, including but not limited to World Wide Web pages and content, or other electronic communications belong to SHT Legal Services - (SHT) They are not confidential; and therefore, there is no reasonable expectation of privacy with respect to communications transmitted by or stored on company-owned electronic communications systems and all such electronic media, data, files, and messages, etc., remain company property.

Although some employees may utilize an individual password to access electronic communications, the communications equipment, nevertheless belongs to SHT Legal Services - (SHT) Therefore, the contents of computer files and data contained on company supplied personal computer hard disks, network servers hard disks, optical disks, floppy disks, ZIP disks and JAZ drives, e-mail messages and file attachments, our voice mail messages, LAN/WAN access, company supplied Internet access, including but not limited to, Web pages and contents, and other electronic communications are accessible at all times by management and may be monitored at any time for any business purposes.

Electronic communications are business records. Thus, the contents of the company's electronic communications may be disclosed without the employee's permission. Everyone should be aware that back-up copies of electronic communications are routinely made for business and other reasons. Therefore, never assume that when electronic communications are deleted, they are gone forever.

Since electronic communications can be accessed without prior notice, do not use electronic communications to transmit any messages that might embarrass you or SHT Legal Services - (SHT), or that you would not want to be read by a third party.

Do not use electronic communications to visit inappropriate or sexually explicit Web sites, to engage in Internet chat rooms or blogs, for jokes, rumors, gossip, for personal information about yourself or others, for forwarding messages



under circumstances likely to embarrass the sender or receiver, or SHT Legal Services - (SHT), or for emotional responses to business correspondence or work situations.

Be aware that electronic messages consume valuable corporate resources, including storage space and network bandwidth. All users should routinely review and evaluate if old or unwanted messages and file attachments should be deleted. No employee or agent may send system-wide broadcast announcements that are not of a business nature.

**Prohibited Activity**

SHT Legal Services - (SHT) strictly prohibits employees from using its or its clients' electronic communications systems for any of the following reasons:

- Uploading, downloading or otherwise transmitting copyrighted, trademarked, or patented material, trade secrets, or other confidential, private or proprietary information or materials without authorization
- Uploading, downloading or otherwise transmitting any illegal information or materials
- Visiting or viewing Web sites containing, dedicated to or specializing in sexually explicit content or materials, or to upload, download, access, create, distribute, or otherwise transmit sexually explicit materials
- Accessing remote computers or other systems, or damaging, altering or disrupting such computers or systems in any way
- Using another employee's password
- Disclosing anyone's password, including your own password, to anyone. (To ensure an adequate safeguarding of corporate resources, all employee passwords must be changed, at a minimum, every 90 days.)
- Enabling unauthorized third parties to have access to or use electronic communications belonging to SHT Legal Services - (SHT), or otherwise jeopardizing the security of the company's electronic communication systems
- Opening e-mail addressed to another employee, unless so authorized by the individual
- Sending anonymous e-mail or facsimile messages
- Engaging in illegal activities
- Soliciting, advertising or proselytizing for commercial ventures, religious or political causes, charitable or other outside organizations, or making any other non-job-related solicitations
- Utilizing a client/customer's electronic equipment for any purpose other than those purposes specifically authorized by the client/customer
- Utilizing recording devices of any type for any purpose other than the intended purpose, or without the express consent of any and all parties who are being recorded

SHT Legal Services - (SHT) strictly prohibits employees from using personal devices of any type to record a conversation or discussion without the express consent of any and all parties who are being recorded.

**Relationship to Harassment Policy**

SHT Legal Services - (SHT) 's Electronic Communications Policy should be read and understood in conjunction with its anti-discrimination and harassment policies. We at SHT Legal Services - (SHT) share a common belief that each of us should be able to work in an environment free of discrimination and harassment of any form, including racial or sexual. Therefore, SHT Legal Services - (SHT) 's electronic communications are not to be used in any manner that would otherwise violate its anti-discrimination or harassment policies.

Examples of forbidden uses that would violate this policy include, but are not limited to, sexually explicit messages, pictures, cartoons, or jokes; unwelcome propositions or love letters; ethnic or racial slurs; or any other message that can be construed to be harassment or disparagement of others based on their protected status, including that which is based on sex, sexual orientation, pregnancy, race, color, religion, age, national origin, disability, veteran status, marital status or other protected status.

If any one believes that he/she is being subjected to any of these forms of harassment via the company's electronic communications systems, he or she must immediately bring this to the attention of his or her immediate supervisor. The very nature of harassment makes it difficult to detect unless the person being harassed registers his or her discontent with the appropriate person. Consequently, the company encourages any individual who believes that he or she may have been harassed in any manner or medium to report such offensive conduct or situations to their supervisors or to Corporate Human Resources.

# Social Media Policy



By signing and initialing below, you acknowledge that you have been provided electronic access to or received, read, and fully understand SHT Legal Services - (SHT) 's policy relating to Social Media, and you agree to fully comply with it.

**Discussion**

SHT Legal Services - (SHT) understands that its employees may choose to participate in Internet-based social media sites during their personal time. Such sites include blogs, wikis, social networks, virtual worlds, third-party review forums, collaborative spaces, and similar.

SHT Legal Services wants to empower our employees to use the social web in an effective way that gives our customers, colleagues and any external viewers the best possible understanding of who we are and what we do.

**This policy will not be construed or applied in a manner that interferes with employees' rights under federal law.**

**Policy**

As an employee of SHT LEGAL SERVICES, you are bound by the SHT Legal Services Business Ethics and Conduct Policy and Electronic Communications Policy, both of which are available through your local office or by logging onto [www.shtlegalservices.com](http://www.shtlegalservices.com). SHT Legal Services employees are expected to exercise good judgment and should observe these guidelines when using social media.

**Understand what is personal vs. professional**

- Before you post something online, realize that this will be a permanent reflection of your identity and that it may never be erased.
- You can express your own opinion, but please make it clear that the opinion is yours and not the company's.
- Social networks blur the lines between public and private, personal and professional. By identifying yourself as a SHT Legal Services employee, you are creating perceptions about your expertise and that of the company.
- Social media sites are a great way to share your thoughts, but sometimes there are more appropriate channels, particularly if you are not happy with something at work. If you have an issue with a colleague, manager or something that the company has done, there are internal channels that you can use as for "Open Door Policy", including your line manager, your HR department, your communications team, your regional team, or [www.shtlegalservices.com](http://www.shtlegalservices.com).
- If off-time online behavior begins to affect at-work performance negatively, these at-work performance issues will be addressed.

**Use privacy settings**

- Be aware of what content is visible to your networks and who else might be able to see it.
- Do not upload photos of colleagues unless you have their permission to do so.
- Many social networks, whether they are location-based or not, have settings that will share your location. Smart phones also contain GPS locator technology and will include this information on photos you post online. Check your device's manual and the social network's help guide to learn how to disable these features.
- If you are communicating with friends or any non-SHT Legal Services individuals, be careful about the work information that you share as it might compromise your safety or the safety of a colleague or the business.

**Stay safe**

- Our work means that we can be targeted by criminals. Do not put yourself, your colleagues, or your family at risk.
- Information about your work, your workplace, or your home may be accessed by criminals and used to target you, so think carefully about what you put online.
- Never talk about security processes, equipment, locations, or procedures.
- Be very careful when posting photographs that may identify you or your colleagues in your work environment or in uniform.
- Be aware that using location-based social media ("geo-tagging") may make you a target for attack. This includes Facebook Check-In, Foursquare, and other location-based sharing applications.
- Be wary of links and 3rd party applications and never click on links unless you are 100% sure they are safe. Many scams, threats, viruses, malware or phishing schemes are often masked to appear like a legitimate message from a friend.
- Do not use location-based sharing applications while on duty (i.e., to "check in" to a SHT Legal Services place of work or client location).

**Stay legal and ethical**

- Be careful that what you post does not break the law, violate your site's Post Orders, or your terms of employment.

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- Your terms of employment prohibit you from giving away confidential information.
- This includes (but isn't limited to) information about trademarks, upcoming product releases or events, sales, financial information, number of products sold, number of employees, company strategy, or any other information that has not been publicly released by the company.
- The above restrictions also apply to client information.
- You are legally liable for anything you write or present online.
- You can be disciplined by the company for commentary, content, or images that are defamatory, pornographic, harassing, or libelous, that can create a hostile work environment or that may bring the company into disrepute.
- You could also be sued by colleagues, competitors, and any individual or company that views your commentary, content, or images as defamatory, pornographic, harassing, libelous or creating a hostile work environment.
- Your terms of employment also prohibit you from selling any product or service that would compete with any of SHT LEGAL SERVICES's products or services unless you obtain permission in writing before you start. This includes, but is not limited to, training, books, products, and freelance writing.
- You are also not permitted to privately sell any SHT Legal Services property.

**Handle with care – confidential information and media relations**

- To ensure that the SHT Legal Services brand is protected, it is important that we present a consistent and controlled company message. This includes messages in social media environments.
- If you are not sure about whether information has been released publicly or have doubts of any kind, speak with your manager or the communications team at headquarters before releasing information that could potentially harm our company, or our current and potential products, employees, partners, and customers.
- Any media inquiries looking for a response on behalf of SHT Legal Services should be referred to the company's press channel at [www.shtlegalservices.com](http://www.shtlegalservices.com).
- Be on the lookout for compliments. If you come across positive remarks about SHT Legal Services that you believe are important, please share them by forwarding them to [www.shtlegalservices.com](http://www.shtlegalservices.com).
- You may come across negative or disparaging posts or customer complaints about the SHT SECURITY. Unless you are a SHT Legal Services Social Media Spokesperson, avoid the temptation to react yourself. Pass the post(s) along to our online team [[shtlegalservices.com](http://shtlegalservices.com)] who are trained to address such comments.
- Exercise sound judgment and common sense, and when in doubt, do not publish.

**Do not ignore mistakes**

- If you are concerned that you have made a mistake or error of judgment, let your manager or the communications team at headquarters know as soon as possible.
- The sooner a mistake is addressed, the more likely the impact can be reduced.

**Records Retention**

Social media posts related to SHT Legal Services that are received via email or that are compiled by media monitoring services will be retained for 90 days. If any posts or related emails are the subject of pending litigation, they will be retained until the litigation is concluded.

**Bandwidth Consumption**

Access to social media sites is a privilege not a right. There may be times where bandwidth may need to be restricted to support routine essential business processes.

# Alcohol- and Drug-Free Workplace Program

By signing and initialing below, you acknowledge that you have been provided electronic access to or received, read, and fully understand SHT Legal Services - (SHT) 's policy relating to the Alcohol- and Drug-Free Workplace Program, and you agree not to violate any of the provisions therein.

**Policy**

SHT Legal Services - (SHT) is committed to the safety, health and well-being of all employees and client personnel. We recognize that alcohol abuse and drug use pose a potential threat. Therefore, we have elected to be an Alcohol- and Drug-Free Workplace and to establish an Alcohol- and Drug-Free Workplace Program that balances our respect for

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individuals with the need to maintain an alcohol- and drug-free environment. It is a violation of our Alcohol- and Drug-Free Workplace policy to use, possess, sell, trade, and/or offer for sale alcohol, illegal drugs or other intoxicants in the workplace or to be on duty while under the influence of any of these.

## **Drug-Free Workplace Act of 1988**

As a U.S. and State contractor, SHT Legal Services - (SHT) is required by The Drug-Free Workplace Act of 1988 to provide a drug-free workplace by taking the following steps:

- Publish and provide access to this policy, informing all employees that the unlawful manufacture, distribution, dispensation, possession or use of a controlled substance is prohibited in the workplace and specifying the actions that will be taken against employees who violate the policy.
- Establish a drug-free awareness program that makes employees aware of a) the dangers of drug abuse in the workplace; b) the policy of maintaining a drug-free workplace; c) any available drug counseling, rehabilitation, and employee assistance programs; and d) the penalties that may be imposed upon employees for substance abuse violations.
- Notify employees that as a condition of employment they must a) abide by the terms of the policy statement; and b) notify the employer, within five calendar days, if he or she is convicted of a criminal drug violation.
- In the case of Federal contracts, notify the contracting or granting agency within 10 days after receiving notice that a covered employee has been convicted of a criminal drug violation in the workplace.
- Impose a penalty on any employee who is convicted of a reportable workplace drug conviction.

## **Definitions**

- *Company* and corporation refer to SHT Legal Services - (SHT)
- *Driver* refers to employees who drive patrol vehicles or who drive personal vehicles while conducting company business.
- *Field management* refers to regional, area, branch, project, and facility management personnel.
- *Headquarters* refers to Companywide Headquarters.
- *Human Resources (HR)* refers to Human Resources Department at Headquarters
- *Reasonable Suspicion* is as generally defined for all who make reasonable suspicion decisions under this policy.

## **Responsibility**

All employees are required not to report to work or otherwise to be subject to duty while their ability to perform job duties is impaired due to on- or off-duty use of alcohol or other drugs.

In addition, employees must:

- Be concerned about working in a safe environment
- Support fellow workers in seeking help
- Use the Employee Assistance Program, if necessary
- Report dangerous behavior to their supervisor
- Notify the company in writing within five calendar days of being convicted of a criminal drug violation or Driving Under the Influence (DUI)

Inform their supervisor when they are under the influence of prescribed medications that could possibly adversely impact their fitness for duty. Any employee taking prescribed or over-the-counter medications is responsible for consulting the prescribing physician and/or pharmacist to ascertain whether the medication may interfere with safe performance of his/her



job. If the use of a medication could compromise the safety of the employee, fellow employees, or the public, it is the employee's responsibility to notify his/her supervisor of such.

It is management's responsibility to:

- Inform employees of the Alcohol- and Drug-Free Workplace policy
- Observe employee performance
- Report known dangerous practices
- Document negative changes and problems in performance
- Refer employees who express interest in the Employee Assistance Program to HR
- Clearly state consequences of policy violations

Any supervisor or manager who makes reasonable suspicion determinations under this policy must complete SHT Legal Services Reasonable Suspicion Training, including information on alcohol misuse and indicators of the use of controlled substances. At least one supervisor/manager at each field office and one manager in corporate HR must be certified.

Additional training may be required.

### **Notification of Convictions**

Any employee who is convicted of a criminal drug violation or Driving Under the Influence (DUI) must notify the company in writing within five calendar days of the conviction. The company will take appropriate action within 30 days of notification. Federal contracting agencies will be notified when appropriate.

### **Applicability**

This policy applies to executive management, managers, supervisors, full-time employees, part-time employees, off-site employees, and applicants. The policy is intended to apply whenever anyone is representing or conducting business for the company. Therefore, this policy applies during all working hours, whenever conducting business or representing the company, and while on company or client property.

### **Communication**

To ensure all employees are aware of their duties under this policy:

- All employees will have access to a copy of the policy.
- The policy will be reviewed and formally acknowledged yearly.
- Posters will be available at all locations.
- Training is available to employees regarding the dangers of alcohol and drug abuse and the availability of help.
- Reasonable Suspicion Training will be provided to assist selected supervisors and managers in recognizing and addressing substance abuse in the workplace.

### **Alcohol and Drug Testing**

SHT Legal Services - (SHT) Alcohol and Drug Testing policy includes:

- Pre-employment testing
- Post-Accident testing
- Reasonable Suspicion testing

SHT Legal Services - (SHT) may also, as appropriate, develop a testing program that includes random testing.

### **TESTING GUIDELINES**

To ensure the accuracy and fairness of our testing program, all testing will be conducted according to Substance Abuse and Mental Health Services Administration (SAMHSA) guidelines, or the equivalent. Only vendors who have been pre-approved by Corporate HR will be utilized for drug testing.

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**PRE-EMPLOYMENT TESTING**

Drug testing is a pre-qualification condition of employment for all SHT Legal Services - (SHT) employees.

**POST-ACCIDENT TESTING**

Employees who drive patrol vehicles or who drive personal vehicles while conducting company business are subject to Post-Accident Testing if they are involved in any of the following: accident involving a fatality; accident in which the driver is cited and there is disabling damage to the vehicle(s) requiring tow-away; or an accident in which the driver is cited and off-site medical treatment is required.

Employees involved in an accident must immediately notify their supervisor (if medically able to do so), remain available for testing, and not consume any alcohol for eight hours after the accident, or until an alcohol and/or drug test has been administered, whichever occurs first. Employees must complete, *Post-Accident Driver Responsibilities*, and *Post-Accident Driver Statement* as soon as possible after the accident. The employee’s responding supervisor must complete *Post-Accident Supervisor Responsibilities*.

Post-Accident Testing Timeline: Alcohol testing should be done within two hours of the incident. Attempts to test for alcohol should cease if eight hours have elapsed after the incident and no test has been done. Drug testing must be done as soon as possible after the incident, but never beyond 32 hours after the incident. If drug and/or alcohol testing is not done within these time limits, management must document why on *Post-Accident Alcohol and Drug Test Documentation*.

Medical Provider and/or Law Enforcement Testing: Testing by law enforcement or medical providers may substitute company testing in some situations, for example:

- Following an accident, an employee may be asked by law enforcement officials to submit to drug and/ or alcohol testing.
- When an injured employee is recovering, SHT Legal Services - (SHT) may require that employee to sign a release directing the medical provider to furnish records that may indicate drug or alcohol use.

The results of these tests are considered to meet federal requirements, provided the test conforms to the applicable federal, state or local alcohol testing requirements, and that the results of the test are obtained by SHT Legal Services - (SHT)

**REASONABLE SUSPICION TESTING**

If an employee is suspected of being under the influence of alcohol or drugs, a supervisor who has received reasonable suspicion training will gather all information, facts, and circumstances leading to and supporting this suspicion.

The *Reasonable Suspicion Documentation* form must be completed within 24 hours of subjecting an employee to reasonable suspicion testing. Reasonable suspicion may be based upon, among other things:

- Observable phenomena, such as direct observation of drug use or possession and/or the physical symptoms of being under the influence of a drug;
- A pattern of abnormal conduct or erratic behavior;
- Arrest or conviction for a drug-related offense, or the identification of an employee as the focus of a criminal investigation into illegal drug possession, use, or trafficking;
- Information provided either by reliable and credible sources or independently corroborated; or
- Newly discovered evidence that the employee has tampered with a previous drug test.





**Although reasonable suspicion testing does not require certainty, mere "hunches" are not sufficient to meet this standard.**

Employee Notification of Reasonable Suspicion Testing: Once reasonable suspicion is established, a supervisor must escort the employee from the work environment to a private area and inform them of the following: 1) Reasonable suspicion exists and you must complete drug and/or alcohol testing; 2) You will be escorted to a testing facility to complete testing; 3) You must present a photo I.D. at the testing facility; 4) You must not engage in safety-sensitive duties until test results are received; 5) For safety reasons, you will not be allowed to drive; 6) You will be provided with transportation to the testing facility and from the testing facility to your home; 7) If you refuse to comply, you will be disciplined up to and including termination of employment, as appropriate.

Reasonable Suspicion Testing Timeline: Alcohol testing should be done within two hours of the incident. Attempts to test for alcohol should cease if eight hours have elapsed after the incident and no test has been done. Drug testing must be done as soon as possible after the incident, but never beyond 32 hours after the incident. If drug and/or alcohol testing is not done within these time limits, management must document why.

## **Refusal to Test**

Employees who refuse to be tested are subject to disciplinary action up to and including termination. All of the following are considered a refusal to be tested:

- Failure to appear for testing
- Not appearing for testing in a timely manner as determine by the employer
- Leaving the collection site before testing is completed
- Failure to provide a specimen
- Failure to allow direct observation for reasonable suspicion
- Providing an insufficient specimen without a valid medical reason
- Failure to undergo medical examination when directed
- Failure to cooperate with any part of the testing process
- Providing an adulterated or substituted specimen

## **Workplace Searches**

To protect the property and safety of our employees and customers and to prevent the use and possession of illegal drugs and alcohol at the workplace, SHT Legal Services - (SHT) reserves the right to conduct a search of any employee's work area and equipment under this policy. All employees are subject to this policy.

A search is a part of an investigation. A search of an employee's work area is not an accusation of wrongdoing. These items can be searched at any time. Examples are: an employee's work area, including an employee's office, desks, files, computer files, e-mails, telephone voice mails, and lockers. All offices, desks, files, computer files, telephones, and lockers are SHT Legal Services - (SHT) or client property, and are issued to employees for business use and for the duration of employment only.

SHT Legal Services - (SHT) will search an employee's work area for missing items or contraband only if it has a reasonable belief that the item in question is in the employee's work area. If possible, before conducting the search, SHT Legal Services - (SHT) will ask the employee about the item in question, and will give the employee the opportunity to produce the item.



Refusal to submit to a search can lead to disciplinary action, including up to and including termination of employment. Employees who are found in possession of stolen property or other contraband will be subject to appropriate disciplinary action, including, if warranted, criminal prosecution.

## **Employee Assistance Program (EAP)**

All employees and their dependents may receive professional consultation for alcohol and drug problems through the Employee Assistance Program (EAP). The financial responsibility for recommended treatment belongs to the employee. Contact Corporate Human Resources if more information is desired.

## **Consequences**

The following violations may result in disciplinary action up to and including termination of employment.

- Using, possessing, selling, trading, and/or offering for sale alcohol, illegal drugs or other intoxicants in the workplace.
- Off-the-job use of substances or alcohol that adversely affects job performance, or that jeopardizes the safety of other employees, the public or company equipment.
- Illegal or unauthorized use of prescription drugs, or intentional misuse or abuse of prescription medications.

## **Recordkeeping**

All records and correspondence relative to this policy must be maintained for five years. Records must be kept in a secure location, separate from personnel files, with controlled access. The information is released on a need-to-know basis only.

## **Exceptions**

Federal, state and/or local law or regulations, collective bargaining agreements, or client contracts may provide exceptions or present limitations to this policy.

Many states regulate employee drug testing, although laws differ considerably among jurisdictions. Certain states allow all types of testing, for example, while others limit both the types of tests and the categories of employees who can be tested. Some states require all employers to conduct drug and alcohol tests using certain specified procedures; others make testing voluntary but mandate the procedures employers must follow and sometimes the laboratories they must use if they choose to test; and in some state's employers are prohibited from disciplining or discharging employees who test positive without a confirmatory test.

**Local offices must check state requirements and contact Corporate HR with questions.**

Requests for any other exceptions to this policy, intended to be rare, will be made in writing to the Senior VP, or HR.



# Employee Concerns Hotline

By signing or initialing below, you acknowledge that you have been provided electronic access to or viewed, read, and fully understand SHT Legal Services - (SHT) 's Employee Concern Hotline program. You understand that SHT Legal Services - (SHT) is committed to the highest standards of business ethics and conduct and that employees are encouraged to report concerns about dishonest, unethical or improper conduct - such as violations of company policy or the law - without fear of retaliation.

**SHT Legal Services** is committed to the highest standards of business ethics and conduct. We encourage all employees to report concerns about dishonest, unethical or improper conduct – anonymously or not, without fear of retaliation. As always, you can raise such concerns with your supervisor or manager. Or, you can contact the Employee Concerns Hotline (ECH) at [shtlegalservices.com](http://shtlegalservices.com).

**All SHT Legal Services employees are urged to report:**

- Fraud
- Theft
- Conflicts of interest
- Misuse of client or company property or information
- Falsified reports or other documents
- Improper gifts or gratuities to or from a customer
- Unethical conduct
- Compliance concerns
- Accounting irregularities
- Substance abuse
- Harassment
- Discrimination
- Work-related accidents
- Workplace violence
- Unsafe working conditions
- Other violations of company policy or the law

**If you call the ECH, we promise:**

- An initial response within 10 working days
- Confidentiality or anonymity, as requested

Employees will not be subject to discipline or retaliation for making a good faith report to management or the ECH. Contact the ECH 24 hours per day:

Online: [www.shtlegalservices.com](http://www.shtlegalservices.com)

OR

Phone

# Reasonable Accommodation Policy

By signing or initialing below, you acknowledge that you have been provided electronic access to or received, read, and fully understand SHT Legal Services - (SHT) 's policy relating to Reasonable Accommodation Policy, and you agree to fully comply with it.

**Scope and Purpose**

SHT INITIALS: \_\_\_\_\_ Employee Initials: \_\_\_\_\_

Original-On-site File Copy-Accounting Copy-Resident



SHT Legal Services complies with the Americans with Disabilities Act (ADA), as amended by the ADA Amendments Act (ADAAA), and all applicable state and local fair employment practices laws and is committed to providing equal employment opportunities to qualified individuals with disabilities. Consistent with this commitment, SHT Legal Services will provide a reasonable accommodation to disabled applicants and employees if the reasonable accommodation would allow the individual to perform the essential functions of the job, unless doing so would create an undue hardship.

SHT Legal Services is also committed to providing a work environment that is respectful of the religious beliefs of its employees. As part of this commitment, SHT Legal Services will make good faith efforts to provide reasonable religious accommodation to employees who's sincerely held religious beliefs conflict with a policy, procedure, or other employment requirement unless such an accommodation would create an undue hardship.

## Definitions

A *reasonable accommodation* for a medical condition is any change in the workplace or the way things are customarily done that provides an equal employment opportunity to an individual with a medical condition. While there are some things that are not considered reasonable accommodations (e.g., removal of an essential job function or personal use items such as a hearing aid that is needed on and off the job), reasonable accommodations can cover most things that enable an individual to apply for a job, perform a job, or have equal access to the workplace and employee benefits such as break rooms, parking lots, and office events. Common types of accommodations include, but are not limited to, granting breaks or providing leave, altering how or when job duties are performed, or removing and/or substituting a marginal function.

A *reasonable accommodation* for a sincerely held religious belief is any reasonable change in the work environment that enables an employee to practice or otherwise observe a sincerely held religious practice or belief without undue hardship on the company. A reasonable religious accommodation may include but is not limited to time for prayer during a work day, the ability to attend religious events or observe a religious holiday, or any necessary modification to SHT Legal Services policy, procedure or other requirement for an employee's (or prospective employee's) religious beliefs, observance or practice, provided such accommodation is reasonable and does not cause undue hardship.

Undue hardship refers to significant difficulty or expense based on the company's resources and circumstances in relationship to the cost or difficulty of providing a specific accommodation. Undue hardship may refer to financial difficulty in providing an accommodation or accommodations that are unduly expensive, substantial, disruptive, or that would fundamentally alter bona fide occupational requirements, the nature or operation of the company's business, or the essential functions of a job. Accommodations which interfere with the safe and efficient operation of the workplace will often present an undue hardship.

*Human Resources* and *HR* refer to the Human Resources Department at SHT Legal Services - (SHT) Headquarters.

*Field Management* refers to regional, area, branch, project, and facility management personnel.

# Benefits Materials Acknowledgement

By signing and initialing below, you acknowledge that you have read and understand this document.

## Employee Benefits Materials Acknowledgement

The following are qualifying event types that result in change to employee benefits participation eligibility:

SHT INITIALS: \_\_\_\_\_ Employee Initials: \_\_\_\_\_

Original-On-site File Copy-Accounting Copy-Resident



- New Hire
- Primary Job Change
- Rehire (Less than 90 Days)
- Rehire (More than 90 Days)
- Part-Time to Full-Time
- Full-Time to Part-Time
- Return from Leave of Absence (after maximum allowed days)
- Open Enrollment
- Qualified Medical Child Support Order

**Please look for an Employee Benefits Package containing Benefits Enrollment Information including enrollment instructions, rules, and restrictions. This will come to you via email when your hire record is generated.**

**Remember:**

- In order to enroll in your benefit plans, you must complete the Enrollment Process within 31 days of your Benefits Eligibility.
- All enrollment instructions, restrictions, benefits materials, plan booklets, Summary Plan Descriptions (SPDs) and Summary of Benefits Coverage documents (SBCs) are available online at [www.shtlegalservices.com](http://www.shtlegalservices.com) or in paper form from your local SHT Legal Services HR Representative. If you do not have access to online materials, please check the box below stating that you do not consent to receiving your SPDs online and paper materials will be made available to you.
- No changes will be permitted after your Initial Eligibility period until the next Open Enrollment period without an eligible "Qualifying Event". If you have an eligible "Qualifying Event" as defined by the IRS that allows you to make benefit election changes, you must complete the enrollment process within 31 days of your Qualifying Event.
- Group insurance benefits are considered "contract-driven". This means that not all assignments offer the same group insurance benefits coverage. When transferring assignments, it is your responsibility to request information pertaining to changes in your group insurance benefits. Your local office can provide you with the most current information on all benefit packages. As with an eligible "Qualifying Event", a maximum of 31 days is allowed to enroll.
- **When your employment is terminated, all benefits are cancelled effective the day of termination.**

## New Employee Pay Options

By signing and initialing below, you acknowledge that you have been provided electronic access to or received, read, and fully understand SHT Legal Services - (SHT) 's policy relating to New Employee Pay Options, and you agree to fully comply with it.



**You have multiple options for receiving your pay. Please review the list below and mark your selection.**

1. **ADP Wisely Pay Card & Wisely Check Program.** By selecting this Program, you can use the following options together or independent of each other as described in the Welcome Kit:
  1. **Wisely Check.** The Wisely Check is a self-issued paycheck made payable to yourself to receive your full net pay if you wish to receive your pay through a paper check. It can be completed each pay day morning and there is no waiting to pick up your check. It is completed by phone wherever you may be. The Wisely Check can be deposited to your personal bank account or cashed for free at any Wisely check cashing partner. There is no fee for using Wisely Checks at authorized locations.
  2. **Wisely Pay by ADP Card.** The Wisely Pay by ADP debit card provides a dependable, safe and very convenient way to receive your pay. You can get your pay through ATM withdrawals, make purchases at stores, and get cash back with those purchases. You may also transfer money to a personal or joint checking account. You can check your balance, track your spending, and manage your account at any time through the my Wisely app or through [wiselypay.com](http://wiselypay.com). Your pay will be available on payday morning, no matter where you are, and you can start spending it immediately. There is no waiting to get your check, and no waiting to cash your check; just use your card to start spending your money. Every employee is eligible for the Wisely debit card. There is no application and no approval process. There is no monthly service charge for the debit card as long as you are employed by your current employer. Many debit card transactions are free but there are transaction fees for other transactions. Wisely Checks can also be used with your debit card account. All of the transaction fees are listed in your Welcome Kit.

2. **Direct deposit.** To enroll in Direct Deposit, you must register on the MyADP website ([www.myadp.com](http://www.myadp.com)) and select "Update Direct Deposit" under the **Pay** menu. Please allow up to 1 week from your hire date for your ADP profile to be accessible for registration. If you require assistance after this 1-week period, please contact your local Human Resources Department for guidance.

## Your PID and Integrity New Employee Acknowledgement

By signing and initialing below, you acknowledge that you have been provided electronic access to or received, read, and fully understand the SHT Legal Services Your PID and Integrity New Employee Acknowledgement and you agree to fully comply with it.

Depending upon your job assignment, you may be issued a Personal Identification Number (PID). You will use this number, along with the last four numbers of your Social Security Number, to sign in to certain posts to record your time worked. Your PID is personal to you. It is for your use only and it must be protected from disclosure to others. **By acknowledging this document, you agree to the following:**

- I will not share my PID with anyone, not even my supervisor or others within SHT Legal Services Management, customer representatives, or my coworkers.
- If anyone asks for my PID, I will decline and immediately report this request to my supervisor or the confidential Employee Concerns Hotline (Hotline) at [shlegalervices.com](http://shlegalervices.com).
- If anyone asks me to use their PID or anyone else's PID for any purpose, I will decline and immediately report this request to my supervisor or the Hotline.



- I understand that sharing my PID, using someone else's PID, failing to report incidents regarding improper PID use or inaccurately recording my time worked will result in disciplinary action, up to or including termination of my employment.
- I understand that if I have any concerns about the contents of the document titled "Your PID & Integrity," I may contact my supervisor or manager or the Employee Concerns Hotline at [shtlegalservices@gmail.com](mailto:shtlegalservices@gmail.com)

**Risk Identification and Elevation:** As a SHT Legal Services employee, you are the eyes and ears of the company. By taking ownership in identifying risks and concerns and reporting them to SHT Legal Services you can ensure our ongoing success.

**Integrity is a Core Value of SHT LEGAL SERVICES:** As SHT Legal Services employees we all must act ethically and honestly in everything that relates to our work. You will not be disciplined or retaliated against for doing the right thing. SHT LEGAL SERVICES' Business Ethics Policy requires that you report all improper conduct, including inaccurate documentation and any violations of law or company policy. If you do not feel comfortable reporting such incidents to local management, call the Hotline. The Hotline is answered by a trained operator and you can report concerns or issues confidentially and even anonymously. Failing to act ethically will result in disciplinary action, up to and including termination.

**SHT LEGAL SERVICES' Commitment to You:** SHT Legal Services commits that individual employees will be treated fairly, with dignity and respect. This enables us to achieve a working environment in which team spirit and commitment to the goals and values of SHT Legal Services are maintained consistently.

## Use of Force Policy and Acknowledgement

By signing and initialing below, you acknowledge that you affirm that you have reviewed SHT Legal Services - (SHT) 's Use of Force Policy ('Policy') and that you have read, understand, and that you agree to comply with the Policy.

### Purpose

The purpose of SHT Legal Services - (SHT) 's (SHT LEGAL SERVICES) Use of Force Policy (Policy), is to document existing policies and requirements governing the use of force by SHT Legal Services Officers.

### Applicability

This Policy applies to all security personnel currently employed by SHT Legal Services that are on-duty and acting within their official capacity as SHT Legal Services employees (SHT Legal Services Officers). All security personnel will acknowledge receipt of this policy via form FM-970 Acknowledgment of SHT Legal Services - (SHT) 's Use of Force Policy as part of the onboarding process.

### Definitions

*Force* within the meaning of this policy means defending against an attack or threat of an attack or coercing or attempting to coerce another or to otherwise exert force against another through any of the following means:

1. Touching another person with your hands, feet or any other part of your body;
2. Use of an impact device, defensive spray, handcuffs, defensive electronic device (e.g., a Taser) or any other implement or weapon;
3. Pointing a firearm at a person, whether or not it is discharged.

*Deadly force* means force likely to cause death or great bodily harm.

*Arrest* means the seizure, detention or forcible restraint of a person.

### Parameters for the Use of Force

SHT INITIALS: \_\_\_\_\_ Employee Initials: \_\_\_\_\_



While every state's laws and regulations vary, as a general rule, security officers are afforded the same legal rights and authority to use force and make arrests as private citizens. As a result, SHT Legal Services Officers must be mindful of the limits of their legal rights and authority when making a decision to use force or make an arrest.

While SHT Legal Services Officers are provided site specific guidelines and requirements governing on-duty performance, all SHT Legal Services Officers are required to observe and report and provide a visible presence in an effort to deter criminal activity. While it is impossible for any document, to provide complete guidance on how to properly handle every situation that a SHT Legal Services Officer might face, the information below is intended to outline SHT LEGAL SERVICES' expectations related to a SHT Legal Services Officer's use of force.

#### Use of Means Other Than Force to Resolve a Situation

To the extent that a situation permits, SHT Legal Services Officers shall attempt to utilize options other than the application of force to resolve situations or to otherwise bring them under control. Alternate options include verbal dialogue, appropriate demeanor and other de-escalation techniques, as well as exiting or leaving the area in question when appropriate and/or reporting the situation to law enforcement and the client.

#### Use of Force Generally

SHT Legal Services Officers may use only that minimal amount of force which is reasonably necessary to defend the SHT Legal Services Officer or another person from an imminent or actual use of unlawful force or to legally arrest a person.

#### Use of Deadly Force

SHT Legal Services Officers may use deadly force only under conditions of extreme necessity as a last resort, when all lesser means have failed or cannot reasonably be employed. SHT Legal Services Officers may not use deadly force except in self-defense or defense of another from imminent death or great bodily harm.

Prior to utilizing deadly force, to the extent practical, a verbal warning should be given. Under no circumstances, may a warning shot be fired. Deadly force shall not be utilized for the purpose of protecting property or apprehending a person believed to have committed a crime.

#### Arrest and Use of Force

Generally, security officers have the same legal authority to make an arrest as a private citizen, and nothing more. Due to the nature of security work, SHT Legal Services Officers may determine that it is necessary to make an arrest. When making an arrest, SHT Legal Services Officers may only use the minimal amount of force that is reasonably necessary to detain the person until law enforcement arrives. You must be aware of the law where you work and ensure that you act in compliance with the law.

#### Obligations Once Force Is Used

Once the situation that has caused the use of force is under control, the SHT Legal Services Officer must:

1. Ensure that the scene is safe;
2. Contact 911 and request law enforcement and medical assistance for any injured persons;
3. Provide first-aid as needed;
4. Contact the on-duty SHT Legal Services Supervisor;
5. Contact the SHT LEGAL SERVICES Communications Center (at [www.shtlegalservices.com](http://www.shtlegalservices.com)) to report the incident; and
6. Complete an Incident Reports documenting any use of force.

#### Compliance with Law

Please note that if any part of this Policy conflicts with the law in the jurisdiction where you work, you are required to comply with the law and disregard that section of the policy.





**Acknowledgement of SHT Legal Services - (SHT) 's Use of Force Policy**

I affirm that I have been provided with a copy of SHT Legal Services - (SHT) 's Use of Force Policy ("Policy") and that I have read, understand, and that I agree to comply with the Policy.

## Off-Duty Training Agreement

By signing and initialing below, you acknowledge that you have been provided electronic access to or received, read, and fully understand the Off-Duty Training Agreement and you agree to fully comply with it.

By participating in self-selected off-duty training you affirm that you understand and agree that such off-duty training is purely voluntary and that you will receive no pay for the time you spend doing it. This training for your own enlightenment and personal development, and by participating you agree that there is no guarantee that a promotion or other workplace benefit will result from it.

By participating in off-duty training you agree to return any SHT Legal Services - (SHT) copyrighted materials provided by the date specified. You will not copy the materials in any fashion for your own or anyone else's use. You agree to pay any fees associated with voluntary on-line training courses provided to SHT Legal Services - (SHT) by outside vendors.

## Exempt Employee Pay and Salary Deduction Policy

By signing and initialing below, you affirm that you have been provided electronic access to or received, read, and fully understand SHT Legal Services - (SHT) 's policy on Exempt Employee Pay and Salary Deductions. You also understand that if assigned to a role that is classified as exempt from overtime wages under the Fair Labor Standards Act, it is your responsibility to adhere to this policy by immediately informing your supervisor, local area office or the Director, Employee Relations, Human Resources in writing if you feel that your salary has been subject to an improper deduction. Allowable deductions from an exempt employee's wages may also be subject to state and/or local laws. SHT Legal Services will comply with these regulations, as applicable.

### Scope and Purpose

To establish a policy that outlines pay deductions for exempt employees and the procedure to be followed should an exempt employee believe that an improper deduction has been made from his or her pay.

### Definitions

Human Resources and HR refer to the Human Resources Department at SHT Legal Services - (SHT) Headquarters.

FLSA refers to the Fair Labor Standards Act.

FMLA refers to the Family and Medical Leave Act.

### Responsibility

Field management personnel are to ensure that this policy is distributed to all exempt employees reporting to them, and signed by each employee and retained in the employee's personnel file.

Employees who believe that improper deductions have been taken from their pay must immediately report their concerns in writing to their supervisor, local area office, or the VP, Employee Relations, HR.

### Process Management



The Vice President, Employee Relations, Human Resources is responsible for the management of the processes related to this policy.

**Discussion**

SHT Legal Services - (SHT) is committed to the fair payment of wages to all employees consistent with the requirements of the FLSA and all other applicable state or local laws, and prohibits improper wage deductions. In accordance with the FLSA, employees whose positions qualify for the executive, administrative, professional, computer or outside sales exemptions are paid on a salary basis and are not eligible for overtime compensation. The FLSA also addresses certain permissible deductions from an exempt employee's regular salary.

**Policy**

Exempt employees normally must receive their full salary for any workweek in which they perform any work, without regard to the number of days and hours worked. Exempt employees will not be paid for any full workweek in which they perform no work for the company.

Deductions that are permissible from an exempt employee's regular salary and which may be taken, in addition to tax and benefit withholdings, include the following:

- Absence from work for one or more full days for personal reasons, other than sickness or disability, if the employee is not eligible for or has exhausted his or her paid vacation/PTO leave benefits. If the employee has not exhausted his or her paid vacation/PTO leave benefits, the absence for personal reasons will be deducted from the employee's available vacation/PTO leave balance.
- Absence from work for one or more full days for sickness or disability, if the employee is not yet eligible for or has exhausted his or her paid sick leave/PTO benefits.
- Full workweek absences for witness duty, jury duty or military leave when no work for the company is performed (the employee may elect, but is not required, to use available paid vacation/PTO during such full week absences). For partial week absences for witness duty, jury duty or military leave, the employee will receive the full weekly salary, subject to offset for any payments received for jury duty, witness fees or military pay.
- Unpaid leave taken for a qualifying absence under the FMLA.
- Unpaid disciplinary suspensions of one or more full days imposed for infractions of safety rules of major significance.
- Unpaid disciplinary suspensions of one or more full days imposed for infractions of serious workplace conduct rules.

Certain other deductions may be permissible. Employees who have a question about a deduction from their salary should immediately contact their supervisor, their local office, or Human Resources.

an employee believes that his or her salary has been subject to an improper deduction, the employee must report it immediately in writing to his or her supervisor, local area office, or the Region's Vice President, Human Resources. An investigation will be promptly conducted, and the employee will be informed of the resolution. an incorrect deduction has been made; the company will correct the error by reimbursing the employee promptly for the deduction. Additionally, the employee who was responsible for the incorrect deduction will be made aware of the error to ensure future compliance with the FLSA regulations. The responsible employee may also be counseled and or disciplined for the error as warranted.

It is important to note that the company will not retaliate against any employee who reports a concern regarding what he or she believes to be an incorrect or improper salary deduction.



# Daily Pay

Please move through each document, and click "Confirm and Continue" to acknowledge that you have received, read, and fully understand the information provided.

As agreed upon Final Interview and Hiring as agreed below:

\$ \_\_\_\_\_ Per Hour

And/or

\$ \_\_\_\_\_ Per Year

SHT Member Print Name

Employee Signature Print Name

\_\_\_\_\_

\_\_\_\_\_

SHT Member Signature & Date

Employee Signature & Date

\_\_\_\_\_

\_\_\_\_\_

SHT INITIALS: \_\_\_\_\_ Employee Initials: \_\_\_\_\_