

Zenith Home Loans, LLC

Employee Handbook



07/21/2021

ABOUT THIS HANDBOOK/DISCLAIMER

The contents of this handbook DO NOT constitute the terms of a contract of employment. Nothing contained in this handbook should be construed as a guarantee of continued employment with Zenith Home Loans (hereinafter referred to as "Company"). The Company strives for all employees to be treated - and to treat one another - with respect. In any instances of misunderstanding, the Company has procedures for arbitration.

Any written or oral statement to the contrary made by a supervisor or manager should not be relied upon by any prospective or existing employee. The only person who has the authority to make an agreement giving an employee the right to continued employment is the President of Zenith Home Loans, and any such agreement must be in writing and signed by the President to be enforceable.

Employment with the Company is on an at-will basis. This means the employment relationship can be terminated by either the employee or the Company at any time, with or without notice and with or without cause. Neither the Company nor the employee needs a reason to terminate the employment relationship.

This at-will nature of an individual's employment with the Company cannot be changed or modified except by a written document signed by the President of the Company or a person authorized by the President. Any express or implied statements, agreements, or assurances concerning the terms, conditions, or duration of an individual's employment with the Company are not binding upon the Company unless they are in writing and signed by the President of the Company. Supervisors do not have authority to make oral agreements guaranteeing employees' future promotions, pay raises, benefits, reassignments or transfers. Any such assurances must be in writing and signed by the President to be enforceable.

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Section 1 - THE LEGAL STUFF

1-1. INTRODUCTION

Our goal is to create a workplace that promotes employee engagement and development. We encourage employees to learn and grow in our business, as we believe employees who are committed to their jobs, and who give their best, will provide an exceptional customer experience that enhances business results. At Zenith Home Loans, we are committed to *helping others achieve more than they ever could alone*. We conduct all of our business operations through our core values. We handbook cannot anticipate every situation or answer every question regarding employment. Due to the ever-changing nature of business, the Company reserves the right to amend, supplement, rescind or make exceptions to any provision of this handbook, as the Company deems appropriate in its sole and absolute discretion. It is not an employment contract and is not intended to create contractual obligations of any kind. Please consult management personnel or Human Resources on matters of specific policies.

This Employee Handbook is designed to acquaint you with many of the policies and procedures that affect your employment. One of your first responsibilities at Zenith Home Loans (hereafter referred to as "the Company") is to become familiar with the contents of this Handbook and to review it with your Manager or Human Resources if you have questions.

We are proud to have you as a member of our team!

1-2. TRIAL PERIOD

The first three months of employees' employment is an introductory period. This is an opportunity for Zenith Home Loans, LLC to evaluate the employee's performance. It also is an opportunity for employees to decide whether they are happy being employed by the Company. The Company will determine whether the employee has the skills and other qualifications needed to succeed and may extend the introductory period if it desires. Completion of the introductory period does not alter the employee's at-will status and should not be interpreted as a guarantee of employment throughout the employee's time here at the company.

1-3. EQUAL EMPLOYMENT OPPORTUNITY

Zenith Home Loans, LLC is an Equal Opportunity Employer that does not discriminate on the basis of actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth and pregnancy-related conditions), gender identity or expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, genetic information, or any other characteristic protected by applicable federal, state or local laws and ordinances. Zenith Home Loans, LLC's management team is dedicated to this policy with respect to recruitment, hiring, placement, promotion, transfer, training, compensation, benefits, employee activities, access to facilities and programs and general treatment during employment.

The Company will endeavor to make a reasonable accommodation of an otherwise qualified applicant or employee related to an individual's: physical or mental disability; sincerely held religious beliefs and practices; and/or any other reason required by applicable law, unless doing so would impose an undue hardship upon the Company's business operations.

Any applicant or employee who needs an accommodation in order to perform the essential functions of the job should contact the Head of Human Resources and/or the Manager to request such an accommodation. The individual should specify what accommodation is needed to perform the job and submit supporting documentation explaining the basis for the requested accommodation, to the extent permitted and in accordance with applicable law. The Company then will review and analyze the request, including engaging in an interactive process with the employee or applicant, to identify if such an accommodation can be made. The Company will evaluate requested accommodations, and as appropriate, identify other possible accommodations, if any. The individual will be notified of The Company's decision regarding the request within a reasonable period. The Company treats all medical information submitted as part of the accommodation process in a confidential manner.

Any employees with questions or concerns about equal employment opportunities in the workplace are encouraged to bring these issues to the attention of the Head of Human Resources and/or the Manager. The Company will not allow any form of retaliation against individuals who raise issues of equal employment opportunity. If employees feel they have been subjected to any such retaliation, they should contact the Head of Human Resources and/or the Manager. To ensure our workplace is free of artificial barriers, violation of this policy including any improper retaliatory conduct will lead to discipline, up to and including discharge. All employees must cooperate with all investigations conducted pursuant to this policy.

1-4. AMERICANS WITH DISABILITIES ACT (ADA) AND REASONABLE ACCOMMODATIONS FOR DISABLED EMPLOYEES

Zenith Home Loans will not discriminate against any employee or qualified job applicant with respect to any terms, privileges, or conditions of employment on the basis of physical or mental disability. Zenith Home Loans will also make reasonable accommodations wherever necessary for all employees and applicants with disabilities, provided that the individual is otherwise qualified to safely perform the duties and assignments connected with the job, and provided that any accommodations made do not impose undue hardship to Zenith Home Loans. Employees that need an accommodation should make it known to the Human Resources department as soon as possible.

1-5. IMMIGRATION LAW COMPLIANCE

The Company is committed to employing only United States citizens and aliens who are authorized to work in the United States and does not unlawfully discriminate on the basis of citizenship or national origin.

In compliance with the Immigration Reform and Control Act of 1986, each new employee, as a condition of employment, must complete the Employment Eligibility Verification Form I-9 and present documentation establishing identity and employment eligibility within three (3) days of employment. Former employees who are rehired must also complete the form if they have not completed an I-9 with the Company within the past three (3) years, or if their previous I-9 is no longer retained or valid.

The Company, through its Designated Official(s), will also verify the employment eligibility of all individuals hired after January 1, 2008 through the E-Verify Program. Any employee whose authorization to work in the United States is not ultimately verified through that program will be terminated after following the procedures set forth in the E-Verify Memorandum of Understanding.

Employees with questions or seeking more information on immigration law issues are encouraged to contact Human Resources. Employees may raise questions or complaints about immigration law compliance without fear of reprisal.

1-6. EMPLOYEE CLASSIFICATIONS

For purposes of this handbook, all Zenith Home Loans, LLC employees fall within one of the classifications below.

Full-Time Employees - Employees who regularly work at least 30 hours per week who were not hired on a short-term basis. Generally, they are eligible for all benefits subject to the terms, conditions, and limitations of each benefit program.

Part-Time Employees - Employees who regularly work fewer than 30 hours per week who were not hired on a short-term basis.

Short-Term Employees - Employees who were hired for a specific short-term project, or on a short-term freelance, per diem or temporary basis. Short-Term employees generally are not eligible for Company benefits, but are eligible to receive statutory benefits.

In addition to the above classifications, employees are categorized as either "**exempt**" or "**non-exempt**" for purposes of federal and state wage and hour laws. Employees classified as exempt do not receive overtime pay; they generally receive the same weekly salary regardless of hours worked. The employee will be informed of these classifications upon hire and informed of any subsequent changes to the classifications.

1-7. BACKGROUND SCREENING

The Company recognizes the importance of maintaining a safe and productive workplace with honest, trustworthy, qualified, reliable, and non-violent employees who do not present a risk of harm to their co-workers or others. For the benefit of all employees and the Company in furthering these interests and enforcing the Company's policies, the Company will perform or request that third parties perform "background" checks or other types of investigations. These background checks and investigations may be performed at any time in the Company's sole discretion, including, but not limited to, in connection with your application for employment, or at any time during the course of your employment with the Company, for purposes of evaluation of your suitability for employment, promotion, reassignment, or retention as an employee.

Employees are expected to cooperate fully with this Background Check policy. Such cooperation includes, among other things, providing truthful and complete information in response to inquiries made by the Company or third-party investigations during the course of investigations. Failure to cooperate in these respects, or any attempt to interfere with the Company's implementation of this policy, or the Company's efforts to obtain relevant information, may result in corrective action, up to and including termination of employment.

1-8. NON-HARASSMENT

It is Zenith Home Loans, LLC's policy to prohibit intentional and unintentional harassment of or against job applicants, contractors, interns, volunteers or employees by another employee, supervisor, vendor, customer or any third party on the basis of actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth and pregnancy-related conditions), gender identity or expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, genetic information or any other characteristic protected by applicable federal, state or local laws (referred to as "protected characteristics"). Such conduct will not be tolerated by Zenith Home Loans, LLC.

The purpose of this policy is not to regulate our employees' personal morality, but to ensure that no one harasses another individual in the workplace, including while on Company premises, while on Company business (whether or not on Company premises) or while representing the Company. In addition to being a violation of this policy, harassment or retaliation based on any protected characteristic as defined by applicable federal, state, or local laws also is unlawful. For example, sexual harassment and retaliation against an individual because the individual filed a complaint of sexual harassment or because an individual aided, assisted or testified in an investigation or proceeding involving a complaint of sexual harassment as defined by applicable federal, state, or local laws are unlawful.

Harassment Defined

Harassment generally is defined in this policy as unwelcome verbal, visual or physical conduct that denigrates or shows hostility or aversion towards an individual because of any actual or perceived protected characteristic or has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Harassment can be verbal (including slurs, jokes, insults, epithets, gestures or teasing), visual (including offensive posters, symbols, cartoons, drawings, computer displays, text messages, social media posts or e-mails) or physical conduct (including physically threatening another, blocking someone's way, etc.). Such conduct violates this policy, even if it does not rise to the level of a violation of applicable federal, state or local laws. Because it is difficult to define unlawful harassment, employees are expected to behave at all times in a manner consistent with the intended purpose of this policy.

Sexual Harassment Defined

Sexual harassment can include all of the above actions, as well as other unwelcome conduct, such as unwelcome or unsolicited sexual advances, requests for sexual favors, conversations regarding sexual activities and other verbal, visual or physical conduct of a sexual nature when:

- submission to that conduct or those advances or requests is made either explicitly or implicitly a term or condition of an individual's employment; or
- submission to or rejection of the conduct or advances or requests by an individual is used as the basis for employment decisions affecting the individual; or
- the conduct or advances or requests have the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working

environment.

Examples of conduct that violate this policy include:

1. unwelcome flirtations, leering, whistling, touching, pinching, assault, blocking normal movement;
2. requests for sexual favors or demands for sexual favors in exchange for favorable treatment;
3. obscene or vulgar gestures, posters or comments;
4. sexual jokes or comments about a person's body, sexual prowess or sexual deficiencies;
5. propositions or suggestive or insulting comments of a sexual nature;
6. derogatory cartoons, posters and drawings;
7. sexually-explicit e-mails, text messages or voicemails;
8. uninvited touching of a sexual nature;
9. unwelcome sexually-related comments;
10. conversation about one's own or someone else's sex life;
11. conduct or comments consistently targeted at only one gender, even if the content is not sexual; and
12. teasing or other conduct directed toward a person because of the person's gender.

Reporting Procedures

If the employee has been subjected to or witnessed conduct which violates this policy, the employee should immediately report the matter to the Manager. If the employee is unable for any reason to contact this person, or if the employee has not received an initial response within five (5) business days after reporting any incident of what the employee perceives to be harassment, the employee should contact the Head of Human Resources. If the person toward whom the complaint is directed is one of the individuals indicated above, the employee should contact any higher-level manager in the reporting hierarchy.

Investigation Procedures

Every report of perceived harassment will be fully investigated, and corrective action will be taken where appropriate. All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed. All employees must cooperate with all investigations conducted pursuant to this policy.

Retaliation Prohibited

In addition, the Company will not allow any form of retaliation against individuals who report unwelcome conduct to management or who cooperate in the investigations of such reports in accordance with this policy. If the employee has been subjected to any such retaliation, the employee should report it in the same manner in which the employee would report a claim of perceived harassment under this policy.

Violation of this policy including any improper retaliatory conduct will result in disciplinary action, up to and including termination.

Section 2 - EMPLOYEE RESPONSIBILITIES

2-1. EMPLOYEE CODE OF CONDUCT

The Company expects every employee to maintain high standards of personal conduct and responsibility and to promote a feeling of pride in being part of the Company. We have detailed policies in this handbook regarding what we expect of employees and actions that are contrary to these policies could result in immediate termination. Here are a few things that we consider **very egregious** and, not only are they against our policies, but some are also against the law. We have low tolerance for such behavior. Please consult the relevant policy in its entirety if you need further clarification.

- Possessing, using, distributing, or selling illegal drugs on the property (including the parking lot) or while conducting Company business off the premises.
- Violence or the threat of violence of any sort.
- Stealing from the company, client, or other employees. (Stealing includes anything.)
- Making sexually explicit remarks/gestures/actions or soliciting sex in any way, shape, or form.
- Violating the harassment or discrimination policy in any way, shape, or form.
- Making racially explicit remarks/gestures.
- Falsification of information with the intention to deceive (such as on employment application, your time card or another employee's time card, company reports, benefits paperwork, etc.)
- Disorderly, threatening, or intimidating conduct against a guest, other employees, vendor (physical or verbal) - this includes things like yelling, physical threats, verbal threats, physical action.
- Violation of Drug and Alcohol-Free Workplace Policy.
- Gross misconduct of any kind.
- Violation of local, state, or federal laws.
- Possession of weapons or explosives of any kind on Company property or while on Company business.
- Any action or act that results in injury, death, or involves significant risk to an employee, client, or vendor.
- Unauthorized access, use, and/or disclosure of proprietary and/or confidential Company information inclusive of trade secrets, pricing structure, compensation plans, and other confidential information.
- Malicious conduct and/or false accusation to destroy friendly relations between the Company and its employees or between employees themselves. Such behavior disrupts production and/or prevents an employee from performing his or her job.
- Deliberate or careless damage or misuse of Company property or fellow employee's property.
- Engaging in behavior that is intimidating or threatening, either explicitly or implicitly.
- Use, possession, or sale of any weapon on company premise
- Using or asking others to use Company materials, computers, telephones, facilities, or labor for personal benefit or gain.
- Sleeping during work time or other misuses of Company time.

- Unauthorized absence from an assigned work area.
- Insubordination (refusal or failure to perform work assigned or to comply with the orders and directions of a Supervisor).
- Failure to maintain proper standards of productivity, the performance of duties, including failure to provide acceptable levels of customer service.
- Smoking in Company buildings or outside areas that have been designated as "no smoking".
- Failure to cooperate with the Company in the investigation of violations of Company policies, the employee code of conduct, or similar matters.
- Engaging in activity that is considered a conflict of interest with an employee's current position in the Company.

These points all seem obvious, but they need to be stated as sometimes they do happen. This list is not all-inclusive as there are always other issues that may arise.

We take violations of the law very seriously and prosecute all cases of theft and fraud. If you know of someone who is violating the law in any way, you may speak with your Manager, District Manager, or call Human Resources.

2-2. TIPPING AND GIFTS

Satisfying our customers requires teamwork. We are a service-orientated business and tipping often benefits only one employee, thus creating inequities and problems. All employees are expected to give the best possible service to all customers. All customers should receive the same courteous treatment with no exceptions or favoritism. Because accepting tips could lead to the perception of favoritism, it is our policy that tipping is prohibited.

Employees may accept occasional unsolicited courtesy gifts or favors of a nominal value (e.g., business lunches or holiday baskets), as long as the favors or gifts are customary in the industry and do not appear to influence the judgment or conduct of the employee in the Company's business.

2-3. PERSONAL APPEARANCE

As a representative of Zenith Home Loans, and the point of contact with our clients, we expect our employees to present themselves in a pleasant, professional, clean and appropriate way. The personal appearance of an employee is a reflection of the Company. Good personal appearance and hygiene go hand-in-hand with excellent customer service. Moderation and good taste in dress and grooming are essential to a good first impression.

Please support the Company's organizational success by maintaining an appearance that is appropriate to your business duties and responsibilities. Management, sales personnel, loan officers, and those employees who come in contact with our public, are expected to dress in accepted corporate tradition.

It is the intent of Zenith Home Loans to maintain a dress code of casual business wear. Casual business wear is defined as relaxed, professional attire. For example, a casual outfit should be well-matched, free of rips or tears, dirt, wrinkles, and/or frays.

1. Employees must maintain a high standard of personal hygiene and grooming when reporting to work.
2. Should any employee wear or attach anything to their body that management feels is not an appropriate portrayal of the conservative image we wish to project, the employee will be requested to remove and/or cover the item.
3. Consumption of alcoholic beverages, nonprescription drugs, or any illegal activity, including general disruptive behavior, will not be permitted or tolerated while working.
4. The Company reserves in its own discretion the right to determine what is professional and acceptable at work.

2-4. YOUR EMPLOYMENT RECORDS

In order to obtain their position, employees have provided personal information, such as address and telephone number. This information is contained in their personnel file.

Employees should keep their personnel file up to date by informing the Head of Human Resources and/or Human Resources Department of any changes. Employees also should inform the Head of Human Resources and/or Human Resources Department of any specialized training or skills they acquire, as well as any changes to any required visas. Unreported changes of address, marital status, etc. can affect withholding tax and benefit coverage. Further, an "out of date" emergency contact or an inability to reach employees in a crisis could cause a severe health or safety risk or other significant problem.

We are committed to ensuring the privacy of our employees' personal information contained in their file. Should you leave the Company, and you'd like your W-2 to find you, it's important we have an accurate address for you up to one year post-employment.

2-5. POSTERS AND BULLETIN BOARDS

Official items posted on the premises of the Company are not to be tampered with in any way. Approval of management must be granted before any personal, political, commercial, or promotional notice or material is posted on the premises.

Employees should routinely review the bulletin boards and stay informed and up-to-date on all marketing promotions and/or legal notices.

2-6. PERSONAL BELONGINGS

The Company will not be responsible for any fire, theft, or any other catastrophe relating to the personal property of its employees.

2-7. HIRING FRIENDS AND FAMILY

A large part of our success is due to our friendly, family atmosphere. However, the employment of relatives in the same area of an organization may cause serious conflicts and problems with favoritism and employee morale. In addition to claims of partiality in treatment at work, personal conflicts from outside the work environment can be carried into day-to-day working relationships.

Although the Company has no policy against the hiring of relatives of existing employees, it is committed to monitoring situations in which relatives work in the same area. Therefore, prior approval from Human Resources must be obtained before an offer of employment is made to applicants who are relatives of existing employees. This policy is not intended to discriminate against such applicants, but to ensure that situations do not arise that create a conflict of interest in the company. For the purpose of this policy, a relative of an employee is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage. It is the intent of the Company to abide by all federal and state mandated employment statutes and regulations.

2-8. COMPANY AND EMPLOYEE CONFIDENTIALITY

Company Confidentiality

Zenith Home Loans ("The Company") may provide to employees in the course of their employment confidential and proprietary information and materials ("Confidential Information") of the Company, its affiliates, and other third parties who have furnished such information and materials to the Company under obligations of confidentiality. Confidential Information includes, but is not limited to, any and all:

Disclosure or use any Zenith Home Loans confidential information, either during or after employment, which includes all client data. Other confidential information may include, without limitation: customer lists, personnel and payroll records of present and past employees, planned acquisitions, financial records of the Company, records of purchases from vendors and suppliers, advertising plans, supplier list, supplier pricing, marketing strategies, testing data, product/service enhancements, financial matters, software programs/products developed by or for the Company, computer files and any other information regarding the business affairs or operating practices or procedures of the Company.

Confidential Information also includes other trade secrets and valuable, confidential information of the Company, its affiliates, or other third parties, which in many instances may not be identified as confidential or proprietary.

Information may be Confidential information whether or not it is provided directly to employees, whether or not employees are given access to the Confidential information, and whether or not inadvertently disclosed to employees. Confidential information does not include information this generally known or available to the public or that is not treated as confidential by the Company.

Confidential information, and all documentation and information relating thereto, must be kept strictly confidential by every employee during employment and after separation from employment. Specifically, except as expressly authorized in writing by the Company, each employee will:

- Not disclose Confidential information to any third party;
- Not remove Confidential information from the Company's premises;
- Return to the Company Confidential information in an employee's possession upon completion of any work for the Company requiring the employee to have access to such Confidential information; and
- Return to the Company all Confidential information upon an employee's separation from employment for whatever reason.

Employee Confidentiality

The Company will provide employee information to outside agencies only upon written authorization of the employee or as provided by law. Human Resources is the only department authorized to disclose information to banks, credit agencies, and other parties requiring employment information. The requesting party will provide you with the appropriate form to give to us authorizing the release of your personal information. Authorization forms may also be obtained through Human Resources. All requests for employment verification must be received by Human Resources in writing.

The Company protects employees' confidentiality and expects the employees to protect the Company's confidences as well. Supervisors may not give out any information about an employee and must refer all calls seeking such information to Human Resources or the Company President. All personnel records and files maintained by the Company are property of the Company and are confidential. They are not to be copied or disclosed to any party except when authorized by management.

2-9. SENSITIVE INFORMATION

Employees are prohibited from:

- Disclosing or using personally identifiable information for any purpose other than for Company business
- Transferring personally identifiable information to or storing it on any unauthorized device or unauthorized communication service.
- Transferring personally identifiable information to or storing it on any Company device that is not authorized for use with personally identifiable information.
- Sharing with anyone (for example, co-workers, contractors, or third parties) any Company-issued device or unique identifier or access password that might grant the user access to personally identifiable information.
- Engaging in any other practice that jeopardizes the security of personally identifiable information.

Examples of inappropriate conduct involving Personally Identifiable Information include, but are not limited to, the following:

- Providing a co-worker your user name and password to a Company computer network containing personally identifiable information.

- Permitting a third-party access to a Company computer containing personally identifiable information.
- E-mailing personally identifiable information to your personal e-mail account.
- Copying personally identifiable information to your computer.
- Disclosing a Company customer list containing personally identifiable information to a friend or a Company competitor.

In addition, employees are obligated to:

- Limit access to personally identifiable information to only those Company employees and contractors whose job or work assignment requires such access.
- Use methods authorized by the Company to securely, transmit or distribute personally identifiable information.
- Use appropriate methods to destroy personally identifiable information.
- Observe any additional restrictions that may be implemented by management to protect personally identifiable information.

2-10. PERSONALLY IDENTIFIABLE INFORMATION (PII) SECURITY

In the event an employee becomes aware of any incident that involves or even "might" involve the unauthorized use, transfer, or disclosure of personally identifiable information, such employee is required to report that incident to Company management. Management, in turn, in conjunction with the Company's Security and Legal Advisors, will determine the appropriate steps to take in response to such possible breach of data security to fulfill the purposes of this policy and the requirement of applicable law.

2-11. CONFLICT OF INTEREST AND BUSINESS ETHICS

Employees are expected and required to act in good faith and in the best interest of the Company at all times. Employees shall avoid any actual conflicts of interest and situations that might give rise to the appearance of a conflict of interest or other impropriety (regardless of whether or not a conflict of interest or other impropriety actually exists). Therefore, concurrent employment by a competitor of the Company, while still an active employee of the Company, is prohibited and may result in termination of employment. Conflicts of interest may also arise from associations (e.g. director, employee, agent, independent contractor or otherwise) with an entity which is a supplier or competitor of the Company, or with which the Company otherwise does business.

Employees shall disclose to the Company any relationship with or interest, whether direct or indirect, in any entity with which he the Company has entered into, or is contemplating entering into, a business relationship. Except for instances in which employees are acting in concert with one or more other responsible employees of the Company, employees shall not participate in any negotiations or decisions relating to such potential or existing relationship. Employees are expected to devote that amount of time and attention to the affairs of the Company which is necessary to diligently perform their duties. However, employees shall not be precluded from engaging in such other business activities so long as such activity is not detrimental to the best interest of the Company and does not interfere with an employee's job performance.

2-12. SOLICITATION AND DISTRIBUTION

To ensure a proper business environment and to prevent interference with work or inconvenience to others, the Company maintains a non-solicitation policy in the workplace. No vendors, salespersons, or other non-employees are allowed on company premises without proper authorization.

The Company recognizes that employees may have interests in events and organizations outside the workplace. However, employees may not solicit or distribute literature concerning these activities during working time. Off-duty employees may not engage in solicitation or distribution of literature in Company buildings or work areas at any time. Distribution of literature is not permitted for any purpose in work areas and can lead to disciplinary action, up to and including termination of employment.

2-13. PUBLICITY/STATEMENTS TO THE MEDIA

All media inquiries regarding the position of the Company as to any issues must be referred to the President and/or the Head of Human Resources. Only the President and/or the Head of Human Resources is authorized to make or approve public statements on behalf of the Company. No employees, unless specifically designated by the President and/or the Head of Human Resources, are authorized to make those statements on behalf of Company. Any employee wishing to write and/or publish an article, paper, or other publication on behalf of the Company must first obtain approval from the President and/or the Head of Human Resources.

2-14. COMPANY PROPERTY

The assets, equipment, and supplies of the Company should be used in a conscientious, efficient, and prudent manner. Company property is not intended for personal use or benefit. When using Company property, employees are expected to exercise care and follow all operating instructions, safety standards, and guidelines. Employees must notify their Manager if any equipment appears to be damaged, defective, or in need of repair.

Desks and other storage devices may be provided for the convenience of employees but remain the sole property of the Company. Employees are not permitted to place their own locks on desks, work areas, and storage areas. Employees are required to use their work areas, storage areas, and supplies in compliance with Company guidelines and policies. These areas, any personal property in and around them, and any company-owned vehicles may be inspected by a representative of the Company at any time without prior notice and without permission or consent from the employee.

The Company will not be liable for theft, loss, or damage to personal items kept in the employee's work or storage areas or damage to vehicles parked in Company lots.

2-15. DISHONEST PRACTICES

The Company will not tolerate dishonest practices. The Company will not tolerate dishonest practices in the forms of theft, fraud and embezzlement. This includes but is not limited to hours worked, expense reports, deception of numbers, and unlawful taking of Company property, its employees, clients, or suppliers. Disciplinary action will be taken against any offender up to and including termination. Applicable evidence will be turned over to the proper authorities for prosecution under the law. Full restitution will be required. Documentation will be entered into your personnel file.

Section 3 - PROBLEM RESOLUTION

3-1. OPEN-DOOR POLICY

From time to time problems or difficulties may surface at work. The Company has a practice of dealing with such issues before major disruptions occur. If you have a problem, management wants to know about it. Every employee with a complaint should bring it to the immediate attention of his or her Supervisor. If you feel the problem has not been resolved, you are encouraged to bring your complaint or grievance to the HR Department or the President.

Please promptly report any complaint to Human Resources or the President within five (5) days. We will promptly address the issue.

The Management of Zenith Home Loans has an "Open Door" policy and is sincerely interested and committed to the best possible resolution of any employees' work-related problem. No problem is too small or unimportant and will be given the utmost consideration. It is against our policy to retaliate against any employee, including management, for voicing issues through this process.

Employees are encouraged to communicate to the Company those working conditions that may become intolerable and may cause you to resign. We encourage this in all of our locations and will follow the requirements of federal, state, and local law when an employee notifies the Company in writing that a working condition exists that the employee believes is intolerable.

If you believe that you are being forced to resign due to unpleasant working conditions or unfair treatment, you should submit a written letter or memo to Human Resources describing the situation.

3-2. DISCIPLINE

Discipline happens when an employee violates any work standards or policies, including but not limited to the ones in this Employee Handbook. Discipline could include, but not necessarily in this order:

1. Coaching and counseling
2. Oral Warning/Written Warning
3. Demotion
4. Immediate Termination

The management of Zenith Home Loans retains the right to terminate an employee's employment at any time, with or without cause or advance notice, based on the at-will nature of employment.

Section 4 - SAFETY AND HEALTH

4-1. HEALTH AND SAFETY

The health and safety of employees and others on Company property are of critical concern to Zenith Home Loans, LLC. The Company intends to comply with all health and safety laws applicable to our business. To this end, we must rely upon employees to ensure that work areas are kept safe and free of hazardous conditions. Employees are required to be conscientious about workplace safety, including proper operating methods, and recognize dangerous conditions or hazards. Any unsafe conditions or potential hazards should be reported to management immediately, even if the problem appears to be corrected. Any suspicion of a concealed danger present on the Company's premises, or in a product, facility, piece of equipment, process or business practice for which the Company is responsible should be brought to the attention of management immediately.

Periodically, the Company may issue rules and guidelines governing workplace safety and health. The Company may also issue rules and guidelines regarding the handling and disposal of hazardous substances and waste. All employees should familiarize themselves with these rules and guidelines, as strict compliance will be expected.

Any workplace injury, accident, or illness must be reported to the employee's supervisor as soon as possible, regardless of the severity of the injury or accident.

4-2. WORKERS' COMPENSATION

The Company provides a comprehensive worker's compensation insurance program at no cost to employees. This program covers any injury or illness sustained in the course of employment that requires medical, surgical, or hospital treatment. Subject to applicable legal requirements, worker's compensation insurance provides benefits after a short waiting period or, if the employee is hospitalized, immediately.

Employees who sustain work-related injuries or illnesses must inform their supervisor immediately. No matter how minor an on-the-job injury may appear, it is important that it be reported immediately. Prompt reporting will enable an eligible employee to qualify for coverage as quickly as possible. Neither the Company nor the insurance carrier will be liable for the payment of worker's compensation benefits for injuries that occur during an employee's voluntary participation in any off-duty recreational, social, or athletic activity sponsored by the Company.

If you require non-emergency medical treatment, you will be directed to a medical facility for treatment (if appropriate in your state). All bills should be submitted directly to the workers' compensation insurance carrier. If you pay for the treatment out of your pocket, reference your name and claim number on the bills and forward to the workers' compensation carrier or to the Human Resources Department for processing.

RETURN TO WORK GUIDELINES

The Company will make every effort to provide restricted duty work for injured employees on worker's compensation, so they can promptly and safely return to some form of employment. The

work provided will accommodate the employee's medical restrictions and physician's instructions, which may include work less than forty (40) hours per week and/or a change in duties to less strenuous tasks. The Company will provide information on the restricted or light duty tasks to your physician and allow your physician to determine whether you are capable of completing the restricted or light duty tasks. Restricted or light duty work may be paid at a different wage than your regular assignment. The Company realizes that not every injured employee will be a candidate for a restricted or light-duty job, and each case will be individually analyzed.

1. You must inform the Company immediately when you are released to restricted or light duty work or you are released to work with no restrictions. You must present the release to your supervisor and Human Resources.
2. The Company must receive in writing the physician's requirements for restricted or light work duty to determine how best to accommodate the request.
3. If you are on worker's compensation restricted duty, you may not perform any tasks that do not comply with your physician's instructions or restrictions. You must not place yourself or your co-workers at risk by performing tasks that you have not yet been released to perform.
4. If you refuse restricted or light duty work that accommodates your medical restrictions, including failing to call or come to work when restricted or light duty work is available, you may be denied salary compensation through the worker's compensation insurance program.

4-3. WORKPLACE VIOLENCE

Zenith Home Loans, LLC is strongly committed to providing a safe workplace. The purpose of this policy is to minimize the risk of personal injury to employees and damage to Company and personal property.

Zenith Home Loans, LLC does not expect employees to become experts in psychology or to physically subdue a threatening or violent individual. Indeed, Zenith Home Loans, LLC specifically discourages employees from engaging in any physical confrontation with a violent or potentially violent individual. However, Zenith Home Loans, LLC does expect and encourage employees to exercise reasonable judgment in identifying potentially dangerous situations.

Experts in the mental health profession state that prior to engaging in acts of violence, troubled individuals often exhibit one or more of the following behaviors or signs: over-resentment, anger and hostility; extreme agitation; making ominous threats such as bad things will happen to a particular person, or a catastrophic event will occur; sudden and significant decline in work performance; irresponsible, irrational, intimidating, aggressive or otherwise inappropriate behavior; reacting to questions with an antagonistic or overtly negative attitude; discussing weapons and their use, and/or brandishing weapons in the workplace; overreacting or reacting harshly to changes in Company policies and procedures; personality conflicts with co-workers; obsession or preoccupation with a co-worker or supervisor; attempts to sabotage the work or equipment of a co-worker; blaming others for mistakes and circumstances; or demonstrating a propensity to behave and react irrationally.

Prohibited Conduct

Threats, threatening language or any other acts of aggression or violence made toward or by any Company employee **WILL NOT BE TOLERATED**. For purposes of this policy, a threat includes any verbal or physical harassment or abuse, any attempt at intimidating or instilling fear in others,

menacing gestures, flashing of weapons, stalking or any other hostile, aggressive, injurious or destructive action undertaken for the purpose of domination or intimidation. To the extent permitted by law, employees and visitors are prohibited from carrying weapons onto Company premises.

Procedures for Reporting a Threat

All potentially dangerous situations, including threats by co-workers, should be reported immediately to any member of management with whom the employee feels comfortable. Reports of threats may be maintained confidential to the extent maintaining confidentiality does not impede Zenith Home Loans, LLC's ability to investigate and respond to the complaints. All threats will be promptly investigated. All employees must cooperate with all investigations. No employee will be subjected to retaliation, intimidation or disciplinary action as a result of reporting a threat in good faith under this policy.

If the Company determines, after an appropriate good faith investigation, that someone has violated this policy, the Company will take swift and appropriate corrective action.

If the employee is the recipient of a threat made by an outside party, that employee should follow the steps detailed in this section. It is important for the Company to be aware of any potential danger in its offices. Indeed, the Company wants to take effective measures to protect everyone from the threat of a violent act by employees or by anyone else.

4-4. SMOKING

Smoking is permitted only in specifically designated areas and on approved break times. "Smoking" includes the use of any tobacco products, electronic smoking devices, and e-cigarettes containing nicotine cartridges.

4-5. DRUG-FREE AND ALCOHOL-FREE WORKPLACE

To help ensure a safe, healthy and productive work environment for our employees and others, to protect Company property, and to ensure efficient operations, Zenith Home Loans, LLC has adopted a policy of maintaining a workplace free of drugs and alcohol. This policy applies to all employees and other individuals who perform work for the Company.

The unlawful or unauthorized use, abuse, solicitation, theft, possession, transfer, purchase, sale or distribution of controlled substances (including medical marijuana), drug paraphernalia or alcohol by an individual anywhere on Company premises, while on Company business (whether or not on Company premises) or while representing the Company, is strictly prohibited. Employees and other individuals who work for the Company also are prohibited from reporting to work or working while they are using or under the influence of alcohol or any controlled substances, which may impact the employee's ability to perform their job or otherwise pose safety concerns, except when the use is pursuant to a licensed medical practitioner's instructions and the licensed medical practitioner authorized the employee or individual to report to work. However, this exception does not extend any right to report to work under the influence of medical marijuana or to use medical marijuana as a defense to a positive drug test, to the extent the employee is subject to any drug testing requirement, except as permitted by and in accordance with applicable law. This restriction does not apply to responsible drinking of alcohol at business meetings and related social outings.

The Company's actions in this regard will depend on the seriousness of the offense. However, the Company considers any violation of this policy to constitute severe misconduct and, in most cases, immediate termination of employment will be appropriate

Violation of this policy will result in disciplinary action, up to and including discharge.

The Company maintains a policy of non-discrimination and will endeavor to make reasonable accommodations to assist individuals recovering from substance and alcohol dependencies, and those who have a medical history which reflects treatment for substance abuse conditions. However, employees may not request an accommodation to avoid discipline for a policy violation. We encourage employees to seek assistance before their substance abuse or alcohol misuse renders them unable to perform the essential functions of their jobs, or jeopardizes the health and safety of any Company employee, including themselves.

Section 5 - COMPENSATION AND TIME WORKED

5-1. PAY PERIODS

All employees are on a semi-monthly schedule. Pay dates are the 15th and the last date of each month. If the 15th or the last day of the month falls on a weekend, then payday will be the Friday before. Overtime payment, which is included with the non-exempt employee's base salary payment, is also paid semi-monthly. Under no circumstances will the Company release any paychecks prior to the announced schedule.

Employees should review paychecks immediately and let the Manager know about any errors no later than seven (7) days after receiving the paycheck.

Zenith Home Loans encourages a paperless payroll. All employees will be asked to be paid by direct deposit. In the event this is not possible, the Company will pay by check. Paystubs can be viewed and printed on-line from our payroll provider's secure website. Paystubs and W-2s are available on-line via the Company payroll provider.

5-2. TIMEKEEPING PROCEDURES

Employees must record their actual time worked for payroll and benefit purposes. Federal and state laws require the Company to keep an accurate record of time worked in order to calculate employee pay and benefits. Time worked is all the time actually spent on the job performing assigned duties. Non-exempt employees must record the time work begins and ends, as well as the beginning and ending time of any departure from work for any non-work-related reason, on forms as prescribed by management. Overtime work must always be approved before it is performed.

Exempt employees are required to report full days of absence from work for reasons such as leaves of absence, sick leave or personal business.

Altering, falsifying or tampering with time records is prohibited and subjects the employee to discipline, up to and including discharge.

It is the employee's responsibility to sign time records to certify the accuracy of all time recorded. Any errors in the time record should be reported immediately to a supervisor, who will attempt to correct legitimate errors.

5-3. OVERTIME

Like most successful companies, Zenith Home Loans, LLC experiences periods of extremely high activity. During these busy periods, additional work is required from all of us. Supervisors are responsible for monitoring business activity and requesting overtime work if it is necessary. Effort will be made to provide employees with adequate advance notice in such situations.

Any non-exempt employee who works overtime will be compensated at the rate of one and one-half times (1.5) their normal hourly wage for all time worked in excess of 40 hours each week, unless

otherwise required by law.

Employees may work overtime only with prior management authorization.

Holiday, PTO, Volunteer or any leave of absence time will not be counted as hours worked for purposes of overtime calculation. Any overtime worked without prior managerial approval may result in disciplinary action.

5-4. BREAKS

1. Managers assign all break periods.
2. Unpaid break periods must be a minimum of 15 minutes in length.
3. Employees are responsible for keeping the break area clean.

5-5. LACTATION BREAKS

Zenith Home Loans, LLC will provide a reasonable amount of break time to accommodate employees desiring to express breast milk for their infant child, in accordance with and to the extent required by applicable law. The break time, if possible, must run concurrently with rest and meal periods already provided. If the break time cannot run concurrently with rest and meal periods already provided, the break time will be unpaid, subject to applicable law.

The Company will make reasonable efforts to provide employees with the use of a room or location other than a toilet stall to express milk in private. This location may be the employee's private office, if applicable. The Company may not be able to provide additional break time if doing so would seriously disrupt the Company's operations, subject to applicable law. Please consult the Head of Human Resources and/or Benefits Administrator with questions regarding this policy.

Employees should advise management if they need break time and an area for this purpose. Employees will not be discriminated against or retaliated against for exercising their rights under this policy.

5-6. MINIMUM WAGE REPORTING

It is the Company's objective to ensure all employees receive at least the minimum wage required by state law and that all reports of minimum wage issues are welcomed and encouraged. This policy will provide an effective way for employees to bring concerns regarding their compensation to management's attention. All concerns will be addressed constructively and without retaliation.

When an employee believes he/she is being paid below the state minimum wage standard, he/she should discuss the situation with Human Resources. Human Resources will investigate the employee's current wage and the employee will normally receive a response within three (3) business days.

Misunderstandings or mistakes can arise in any organization and the company is committed to resolving them quickly.

5-7. PAYROLL DEDUCTIONS

Various laws require certain withholdings from employees' compensation. Deductions you will see itemized on your paycheck may include:

- Federal income tax
- State income tax
- Federal Insurance Contribution Act - FICA (Social Security & Medicare)
- Employee's portion of group insurance premiums, if applicable
- Court-ordered deductions or garnishments, if applicable

Section 6 - OPERATIONAL POLICIES

6-1. WORKING HOURS AND SCHEDULE

Employees will be assigned a work schedule and will be expected to begin and end work according to the schedule. To accommodate the needs of the business, at some point Zenith Home Loans, LLC may need to change individual work schedules on either a short-term or long-term basis.

Employees will be provided meal and rest periods as required by law. A supervisor will provide further details.

6-2. PUNCTUALITY AND ATTENDANCE

The purpose of this policy is to set forth the company's policy and procedures for handling employee absences and tardiness to promote the efficient operation of the company and minimize unscheduled absences.

Policy

Punctual and regular attendance is an essential responsibility of each employee at Zenith Home Loans. Employees are expected to report to work as scheduled, on time and prepared to start working. Employees also are expected to remain at work for their entire work schedule. Late arrival, early departure or other absences from scheduled hours are disruptive and must be avoided.

This policy does not apply to absences covered by the Family and Medical Leave Act (FMLA) or leave provided as a reasonable accommodation under the Americans with Disabilities Act (ADA). These exceptions are described in separate policies.

Absence

"Absence" is defined as the failure of an employee to report for work when he or she is scheduled to work. The two types of absences are defined below:

Excused absence occurs when all the following conditions are met:

- The employee provides to his or her supervisor sufficient notice at least 48 hours in advance of the absence.
- The absence request is approved in advance by the employee's supervisor.
- The employee has sufficient accrued paid time off (PTO) to cover the absence.

Unexcused absence occurs when any of the above conditions are not met.

- If it is necessary for an employee to be absent or late for work because of an illness or an emergency, the employee must notify his or her supervisor no later than the employee's scheduled starting time on that same day. If the employee is unable to call, he or she must have someone make the call.

An unexcused absence counts as one occurrence for the purposes of discipline under this policy.

Employees with three or more consecutive days of excused absences *because of illness or injury* must give the company proof of physician's care and a fitness for duty release prior to returning to work.

Employees must take earned PTO for every absence unless otherwise allowed by company policy (e.g., leave of absence, bereavement, jury duty).

Tardiness and Early Departures

Employees are expected to report to work and return from scheduled breaks on time. If employees cannot report to work as scheduled, they must notify their supervisor no later than their regular starting time. This notification does not excuse the tardiness but simply notifies the supervisor that a schedule change may be necessary.

Employees who must leave work before the end of their scheduled shift must notify a supervisor immediately.

Tardiness and early departures are each one-half an occurrence for the purpose of discipline under this policy.

Disciplinary Action

Excessive absenteeism is defined as two or more occurrences of unexcused absence in a 30-day period and will result in disciplinary action. Eight occurrences of unexcused absence in a 12-month period are considered grounds for termination.

Job Abandonment

Any employee who fails to report to work for a period of three days or more without notifying his or her supervisor will be considered to have abandoned the job and voluntarily terminated the employment relationship.

6-3. REMOTE WORK/TELECOMMUTING

Zenith Home Loans, LLC may allow employees to work remotely if their job duties and work performance are determined to be eligible for remote work. Eligibility will be decided on a case-by-case basis by the Company. Employees also may be required to work remotely during periods of public health emergencies if government orders and mandates recommend such work.

This policy provides general information regarding remote work/telecommuting. Employees who are approved to work remotely should consult their individual agreement for specific details of their remote work/telecommuting arrangement, such as expected work hours, equipment provided, and other important information.

Any remote work/telecommuting arrangement may be discontinued by the Company at any time and at the discretion of the Company. Employees also may discontinue the arrangement but may not be guaranteed office space at the Company's location.

At-Will Employment

This policy and any individual agreement addressing this work arrangement do not create a contract of employment and are not intended to be considered or construed as a promise of continued

employment. Employment is at will and may be discontinued at any time by the Company or employee without notice, cause, or liability.

Hours of Work

Scheduled hours of work will be set by the employees' manager or supervisor. Employees should maintain regular contact with their supervisors and managers.

Nonexempt employees must accurately record all hours worked pursuant to the Company's timekeeping system and take rest and meal breaks as if in the Company's workplace and as required by law. Nonexempt employees may not work beyond scheduled working hours (including working more than 40 hours in a workweek) without prior authorization from their manager or supervisor.

Location

Employees will provide, at their expense, a secure, dedicated work area. Employees are responsible for maintaining the work area in a safe, secure, and nonhazardous condition at all times. Employees will maintain security devices and procedures necessary to prevent use by unauthorized persons, including by preventing the connection of any Company-furnished computer system, network, or database to any computer, network, or database other than a computer, network, or database to which connections are provided or authorized by the Company.

Duties

Employees are expected to follow all existing Company policies and procedures. The duties, obligations, responsibilities, and conditions of employment with the Company remain unchanged. Employees must stay engaged with work throughout the workday and be fully available during normal business hours. If employees do not successfully perform their job duties remotely, this arrangement will be revoked. Employees are expected to follow existing Company policies with respect to scheduled and unscheduled time off, including the obligation to speak with their manager or supervisor before the scheduled start time in the event of an unscheduled absence, tardy, or early departure.

Accidents and Injuries

Employees agree to maintain safe conditions in the remote work space and to practice the same safety habits and rules applied on Company premises. If employees incur an injury arising out of the course and scope of the assigned job duties while working in the remote work space, the workers' compensation provisions in place for the state in which the employees are working will apply. Employees must notify their supervisor or manager immediately and complete all necessary and/or requested documents regarding the reported injury. The Company assumes no responsibility for injuries occurring in the remote work space outside normal working hours or for injuries that occur as a result of a reasonably recognizable unsafe remote work space.

Equipment

Employees agree to use electronic equipment that has been encrypted and meets all of the Company's security requirements. If the Company provides equipment for home use, employees agree to provide a secure location for Company-owned equipment and will not use, or allow others to use, such equipment for purposes other than Company business. Employees have no expectation of ownership in such equipment, linkages, property, or other items installed or provided by the Company. The Company will bear the expense of removal of any such equipment, linkages, and

installations provided by the Company upon the termination of the remote work/telecommuting arrangement but not modification of or repairs to the work location. Employees hereby release the Company from any damage or liability incurred in the installing or removal of the equipment provided by the Company.

Return of Company Property

All equipment, records, and materials provided by the Company will remain Company property. Employees agree to return Company equipment, records, and materials upon request. All Company equipment will be returned by employees for inspection, repair, or replacement as needed or requested or immediately upon termination of the remote work/telecommuting arrangement. All equipment must be returned as soon as possible to the employees.

Confidentiality

Employees agree that they are subject to the Company's policies prohibiting the nonbusiness use or dissemination of the Company's confidential business information. Employees will take all appropriate steps to safeguard the Company's confidential business information, including segregating it from personal papers and documents, not allowing nonemployees to access such information, and keeping such information in locked drawers or file cabinets when not in use. Employees will maintain confidential information, including, but not limited to, information regarding the Company's products or services, processing, marketing and sales, client lists, client e-mail addresses and mailing addresses, client data, orders, memoranda, notes, records, technical data, sketches, designs, plans, drawings, trade secrets, research and development data, experimental work, proposals, new product and/or service developments, project reports, sources of supply and material, operating and cost data, and corporate financial information.

Contact

If employees have any questions concerning this policy or would like to apply to work remotely, they should contact their manager.

6-4. TRAVEL TIME FOR NON-EXEMPT EMPLOYEES

Commuting Time

Under the Portal to Portal Act, travel from home to work and from work to home is generally non-compensable. However, if a non-exempt employee regularly reports to a worksite near their home, but is required to report to a worksite farther away than the regular worksite, the additional time spent traveling is compensable.

If compensable travel time results in more than 40 hours worked by a non-exempt employee, the employee will be compensated at an overtime rate of one and one-half (1-1/2) times the regular rate.

To the extent that applicable state law provides greater benefits, state law applies.

6-5. SAFE HARBOR POLICY FOR EXEMPT EMPLOYEES

It is Zenith Home Loans, LLC's policy and practice to accurately compensate employees and to do so in compliance with all applicable state and federal laws. To ensure proper payment and that no improper deductions are made, employees must review pay stubs promptly to identify and report all errors.

Those classified as exempt salaried employees will receive a salary which is intended to compensate them for all hours they may work for Zenith Home Loans, LLC. This salary will be established at the time of hire or classification as an exempt employee. While it may be subject to review and modification from time to time, such as during salary review times, the salary will be a predetermined amount that will not be subject to deductions for variations in the quantity or quality of the work performed.

Under federal and state law, salary is subject to certain deductions. For example, unless state law requires otherwise, salary can be reduced for the following reasons:

- full-day absences for personal reasons;
- full-day absences for sickness or disability if the deduction is made in accordance with a bona fide plan, policy or practice of providing wage replacement benefits for such absences (deductions also may be made for the exempt employee's full-day absences due to sickness or disability before the employee has qualified for the plan, policy or practice or after the employee has exhausted the leave allowance under the plan);
- full-day disciplinary suspensions for infractions of our written policies and procedures;
- Family and Medical Leave Act absences (either full- or partial-day absences);
- to offset amounts received as payment from the court for jury and witness fees or from the military as military pay;
- the first or last week of employment in the event the employee works less than a full week; and
- any full work week in which the employee does not perform any work.

Salary may also be reduced for certain types of deductions such as a portion of health, dental or life insurance premiums; state, federal or local taxes; social security; or voluntary contributions to a 401(k) or pension plan.

In any work week in which the employee performed any work, salary will not be reduced for any of the following reasons:

- an absence because the Company has decided to close a facility on a scheduled work day;
- absences for jury duty, attendance as a witness, or military leave in any week in which the employee performed any work (subject to any offsets as set forth above); and
- any other deductions prohibited by state or federal law.

However, unless state law provides otherwise, deductions may be made to accrued leave for full- or partial-day absences for personal reasons, sickness or disability.

If employees believe they have been subject to any improper deductions, they should immediately

report the matter to a supervisor. If the supervisor is unavailable or if the employee believes it would be inappropriate to contact that person (or if the employee has not received a prompt and fully acceptable reply), they should immediately contact the Head of Human Resources or any other supervisor in Zenith Home Loans, LLC with whom the employee feels comfortable.

6-6. RECORD RETENTION

Zenith Home Loans, LLC acknowledges its responsibility to preserve information relating to litigation, audits and investigations. Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against the Company and its employees and possible disciplinary action against responsible individuals (up to and including discharge of the employee). Each employee has an obligation to contact the Human Resources Department to inform them of potential or actual litigation, external audit, investigation or similar proceeding involving the Company that may have an impact on record retention protocols.

Section 7 - TECHNOLOGY AND COMMUNICATIONS

7-1. USE OF COMMUNICATIONS AND COMPUTER SYSTEMS

Zenith Home Loans, LLC's communication and computer systems are intended primarily for business purposes; however limited personal usage is permitted if it does not hinder performance of job duties or violate any other Company policy. This includes the voice mail, e-mail and Internet systems. Users have no legitimate expectation of privacy in regard to their use of the Zenith Home Loans, LLC systems.

Zenith Home Loans, LLC may access the voice mail and e-mail systems and obtain the communications within the systems, including past voice mail and e-mail messages, without notice to users of the system, in the ordinary course of business when the Company deems it appropriate to do so. The reasons for which the Company may obtain such access include, but are not limited to: maintaining the system; preventing or investigating allegations of system abuse or misuse; assuring compliance with software copyright laws; complying with legal and regulatory requests for information; and ensuring that Company operations continue appropriately during the employee's absence.

Further, Zenith Home Loans, LLC may review Internet usage to ensure that such use with Company property, or communications sent via the Internet with Company property, are appropriate. The reasons for which the Company may review employees' use of the Internet with Company property include, but are not limited to: maintaining the system; preventing or investigating allegations of system abuse or misuse; assuring compliance with software copyright laws; complying with legal and regulatory requests for information; and ensuring that Company operations continue appropriately during the employee's absence.

The Company may store electronic communications for a period of time after the communication is created. From time to time, copies of communications may be deleted.

The Company's policies prohibiting harassment, in their entirety, apply to the use of Company's communication and computer systems. No one may use any communication or computer system in a manner that may be construed by others as harassing or offensive based on race, national origin, sex, sexual orientation, age, disability, religious beliefs or any other characteristic protected by federal, state or local law.

Further, since the Company's communication and computer systems are intended for business use, all employees, upon request, must inform management of any private access codes or passwords.

Unauthorized duplication of copyrighted computer software violates the law and is strictly prohibited.

No employee may access, or attempt to obtain access to, another employee's computer systems without appropriate authorization.

Violators of this policy may be subject to disciplinary action, up to and including discharge.

7-2. SPEAR DISCLOSURE

The Company has developed a customer relationship management Tool known as SPEAR which includes certain third-party products and intellectual property.

The Company makes the tool available to users via the Internet. The Company grants to the Employee a non-exclusive, non-transferable, non-sublicensable and limited right to access the tool via the Internet and use the Tool solely for (i) the purpose of Employee's employment or other relationship with the Company and (ii) the duration of the term of agreement or employment.

7-3. HANDLING CONFIDENTIAL INFORMATION

Employees should take great care in sending any electronic communications to ensure they do not improperly reveal confidential, proprietary, sensitive and/or trade secret Company information. This includes posts to your own personal Web log or "blog". Use caution in addressing messages to make sure that communications are not inadvertently made to unintended recipients. Should mistakes occur, as with any similar situation, promptly act to address the problem, including immediately consulting with supervisors as appropriate.

PROHIBITED USES OF COMPUTERS AND COMMUNICATIONS SYSTEMS

Under no circumstances should the Company's electronic communication or your own personal blog be used for sending, accessing, posting, receiving or storing any material of an insensitive, discriminatory, or harassing nature, or that is of a threatening, obscene or defamatory nature, for chain letters, or for any other purpose that is illegal, against the Company's policy or contrary to the Company's interests. The Company's electronic communication system should not be used to send, receive or post messages related to any business other than the Company or transmit copies of documents in violation of copyright laws. Any misuse of electronic communications should be reported promptly to your Supervisor.

7-4. COMPANY MONITORING

The Company's computer network and telephone systems are provided to conduct the Company's business and for the benefit of our clients. The company does not, as a matter of routine, review or monitor e-mail messages, telephone information or computer-generated documents, business or non-business. However, all such information, including e-mail, instant messages, postings, internet access, downloads, or voice messages may be accessed to protect the Company's legitimate business interests.

The Company has the right to inspect, review, and monitor the use of its computers, the network, electronic mail, telephone systems, and any other aspect of its electronic systems and may do so in the discretion of management for a variety of reasons. Those reasons can include, by way of example only, a Company need for information when an employee who generally has access is unavailable; a need to locate substantive information that is not more readily available by some other less intrusive means; legitimate customer request information; auditor request; security or access reviews or audits; requests for law enforcement purposes; potential or actual litigation; concern that Company property is being used in an unauthorized manner; and other business needs.

In this regard, it is important to understand that incidental and occasional personal use of the Company's computer network, including e-mail and voicemail, to send, receive, and store information is permitted, but that information is not treated differently from other information. Thus, if the Company searches or discloses information stored on its computer or telephone system, personal information may be included. Stated differently, employees should be aware that they cannot expect use of the Company's computer network or telephone system to be private. Use of the computer network constitutes employee consent to the Company's right to access and review any information stored on its computer or telephone systems for business-related purposes.

Please also note that the Company may monitor usage patterns for all communications (voice and data), which include access, call length, and time of call, for purposes of cost analysis, business planning, or compliance with Company policy.

Monitoring of Communications

It is the policy of the Company to encourage open communications among our employees and between employees and management. To facilitate such open communication, and to prevent the chilling effect that may occur if employees are permitted to tape or secretly record or surreptitiously listen in on any conversation or communication, and to ensure compliance with applicable federal, state, and local wiretapping, eavesdropping, privacy laws, the Company has instituted the following policy:

Without the prior written consent of the Company's President, no employee may openly or secretly tape or otherwise surreptitiously record, or videotape, any conversation, communication, activity, or event. This prohibition applies to any conversation, communication, activity, or event which in any way involves the Company or employees of the Company or any of our subsidiaries or affiliates companies, or any customers or clients, or any other individual with whom the Company is doing business or intending to do business in any capacity (for example, vendors, suppliers, consultants, attorneys, independent contractors). This policy also applies to conversations and communications with any other third parties unrelated to the Company including, but not limited to, outside legal counsel, auditors, and regulatory officials.

7-5. SOFTWARE CODE OF ETHICS

Unauthorized duplication of copyrighted computer software violates the law is contrary to the Company's standards of conduct. The Company disapproves of such copying and recognizes the following principles as a basis for preventing its occurrences:

- The Company will neither engage in nor tolerate the making or using of unauthorized software copies under any circumstances.
- The Company will provide legally acquired software to meet the legitimate software needs in a timely fashion and in sufficient quantities for all the Company's computers.
- The Company will comply with all license or purchase terms regulating the use of any software the Company acquires or uses.
- The Company will enforce strong internal controls to prevent the making or using of unauthorized software copies, including effective measures to verify compliance with these standards and appropriate disciplinary measures for violations of these standards.

7-6. CELL PHONE USE

Company telephones are intended for business use. Employees are asked not to make or receive personal telephone calls or messages on our Company telephones except in an emergency. Your cooperation in keeping our lines open for business is appreciated. Employees are expected to make personal calls on non-work time when possible and to ensure that friends and family members are aware of the Company's policy.

Cell phones shall be turned off or set to silent or vibrate mode during meetings. Conferences and in other locations where incoming calls may disrupt normal workflow. Employees may carry and use personal cell phones on a sporadic basis. If an employee's use of a personal cell phone causes disruptions or loss in productivity, the employee may become subject to disciplinary action per Company policy.

7-7. USE OF SOCIAL MEDIA

Zenith Home Loans, LLC respects the right of any employee to maintain a blog or web page or to participate in a social networking, Twitter or similar site, including but not limited to Facebook and LinkedIn. However, to protect Company interests and ensure employees focus on their job duties, employees must adhere to the following rules:

Employees may not post on a blog or web page or participate on a social networking platform, such as Twitter or similar site, during work time or at any time with Company equipment or property.

All rules regarding confidential and proprietary business information apply in full to blogs, web pages and social networking platforms, such as Twitter, Facebook, LinkedIn or similar sites. Any information that cannot be disclosed through a conversation, a note or an e-mail also cannot be disclosed in a blog, web page or social networking site.

Whether the employees are posting something on their own blog, web page, social networking, Twitter or similar site or on someone else's, if the employee mentions the Company and also expresses either a political opinion or an opinion regarding the Company's actions that could pose an actual or potential conflict of interest with the Company, the poster must include a disclaimer. The poster should specifically state that the opinion expressed is his/her personal opinion and not the Company's position. This is necessary to preserve the Company's good will in the marketplace.

Any conduct that is impermissible under the law if expressed in any other form or forum is impermissible if expressed through a blog, web page, social networking, Twitter or similar site. For example, posted material that is discriminatory, obscene, defamatory, libelous or violent is forbidden. Company policies apply equally to employee social media usage.

Zenith Home Loans, LLC encourages all employees to keep in mind the speed and manner in which information posted on a blog, web page, and/or social networking site is received and often misunderstood by readers. Employees must use their best judgment. Employees with any questions should review the guidelines above and/or consult with their manager. Failure to follow these guidelines may result in discipline, up to and including discharge.

7-8. END OF EMPLOYMENT

Upon termination of employment with Zenith Home Loans, you may not access the Company's computer systems, download files or any information from the Company's computer systems/mobile devices or in any way interfere, disrupt, modify or change any computer program used by the Company or any data stored on the Company's computer systems. It is the employee's responsibility to protect all electronic devices that have the Company's e-mail. All electronic devices are required to have a password protection feature. Employees will report any lost and/or stolen devices to the Company's Technology Department immediately. The Company reserves the right to wipe all information regarding Zenith Home Loans from employee's electronic devices. The Company requires that employees comply with city, state, and federal laws regarding mobile usage while operating a motor vehicle. The Company will not be responsible for misuse. All company communication conducted while operating a motor vehicle should utilize hands-free technology.

Section 8 - BENEFITS

8-1. BENEFITS OVERVIEW

In addition to good working conditions and competitive pay, it is Zenith Home Loans, LLC's policy to provide a combination of supplemental benefits to all eligible employees. In keeping with this goal, each benefit program has been carefully devised. These benefits include time-off benefits, such as vacations and holidays, and insurance and other plan benefits. We are constantly studying and evaluating our benefits programs and policies to better meet present and future requirements. These policies have been developed over the years and continue to be refined to keep up with changing times and needs.

The next few pages contain a brief outline of the benefits programs Zenith Home Loans, LLC provides employees and their families. Of course, the information presented here is intended to serve only as guidelines.

The descriptions of the insurance and other plan benefits merely highlight certain aspects of the applicable plans for general information only. The details of those plans are spelled out in the official plan documents, which are available for review upon request from the Head of Human Resources and/or Benefits Administrator. Additionally, the provisions of the plans, including eligibility and benefits provisions, are summarized in the summary plan descriptions ("SPDs") for the plans (which may be revised from time to time). In the determination of benefits and all other matters under each plan, the terms of the official plan documents shall govern over the language of any descriptions of the plans, including the SPDs and this handbook.

Further, Zenith Home Loans, LLC (including the officers and administrators who are responsible for administering the plans) retains full discretionary authority to interpret the terms of the plans, as well as full discretionary authority with regard to administrative matters arising in connection with the plans and all issues concerning benefit terms, eligibility and entitlement.

While the Company intends to maintain these employee benefits, it reserves the absolute right to modify, amend or terminate these benefits at any time and for any reason.

If employees have any questions regarding benefits, they should contact the Head of Human Resources and/or Benefits Administrator.

8-2. PAID HOLIDAYS

The Company recognizes the following eleven (12) days as paid holidays for regular, full-time non-sales employees:

New Year's Day

Martin Luther King, Jr. Day

Memorial Day

Independence Day

Labor Day
Veterans' Day
Thanksgiving Day
Day after Thanksgiving
1/2 day - Christmas Eve
Christmas Day
1/2 day - New Year's Eve
Floating holiday

Please keep in mind that the day on which the holiday is observed may vary from year to year based on the Company's business needs and the day on which the holiday falls. The Company will inform you of the days on which these holidays are observed at your location.

If eligible, you will be paid 8 hours of holiday pay on full days and 4 hours of holiday pay on half days for a holiday regardless of whether you are normally scheduled to work that day or not. Holiday pay for exempt employees or employees whose compensation plan includes commissions will be paid based upon their base salary rate. Holiday pay for hourly employees will be paid at their base hourly pay rate, excluding overtime, bonuses or other compensation.

8-3. RELIGIOUS HOLIDAYS

The Company recognizes that you may wish to observe a religious holiday. If you would like to take a day off for such reasons, you may be permitted to do so by using earned available paid time off (PTO) (see Paid Time Off policy) or taking the time off without pay. However, as with other scheduled time off, prior approval must be obtained from your supervisor, and the time away from work must not unduly interfere with Company Business.

8-4. PAID TIME OFF

The Company's Paid Time Off (PTO) Plan provides eligible employees with the flexibility to use paid time off to meet their personal needs while recognizing employees' individual responsibility to manage their own paid time off. It is up to the employee to determine when he/she will request to use paid time off. Examples of uses for PTO could include vacation, illness, caring for children, school activities, medical/dental appointments, leave, personal business, or emergencies. Time off pursuant to the PTO plan is in addition to time off pursuant to the Company's holiday, jury duty, and bereavement leave policies.

Eligibility: Only full-time, **non-sales**, employees are eligible to earn PTO. PTO is provided as a benefit to regular, full-time employees to recognize service. PTO is not eligible to be paid out at termination, either voluntary or involuntary, unless specifically required by law.

Amount of PTO Earned

Only full-time, non-sales employees are eligible to earn PTO as follows:

Months of Service	Annual Paid Time Off Available PTO	Accrual Rate- Hours/Payroll	PTO Available for Use	Maximum Rollover into New Year
0 to 1 year anniversary	80 hours (10 days)	3.33	As earned	40 hours
1 - 4 years	120 hours (15 days)	5.00	As earned	40 hours
5+ years	160 hours (20 days)	6.67	As earned	40 hours

PTO accruals will be suspended while an employee is out on leave and will resume upon return.

Payment of PTO

Payment of PTO for exempt employees or employees whose compensation plan includes commissions will be paid based upon their base salary rate. Payment for PTO for hourly employees will be paid at their base hourly pay rate, excluding overtime, bonuses or other compensation. Hours paid as PTO pay will not be included in total number of hours worked for overtime calculations.

Notice and Scheduling

PTO may only be used in quarter-hour blocks of time. PTO taken will be reported on a timesheet which must be approved by your manager prior to submission to payroll.

Employees are required to complete and submit an electronic request to their manager for all requested time off. Time off may not be taken by an employee until the PTO request has been approved. Therefore, PTO should be scheduled as far in advance as possible, but no less than the week prior to the requested time off to balance the workload.

There may be occasions, such as sudden illness when an employee is unable to schedule the use of his/her PTO. In these situations, the employee must contact his/her immediate supervisor to request unscheduled PTO as soon as possible, but no later than the beginning of his/her scheduled work time.

Because unscheduled requests for time off create a burden for the Company in balancing workload and/or meeting the needs of the business, the employee must provide the reason for the request for unscheduled PTO. If an employee requests unscheduled PTO more than six (6) times during the year the employee may be subject to corrective action up to and including termination.

Employees are responsible for managing the use of their own PTO. Employees are encouraged to hold some time in "reserve" for unexpected absences required for emergencies and/or illnesses. If an employee exhausts all available PTO and then continues to take or request time off, it may result in corrective action up to and including termination.

The Company reserves the right to deny a request for scheduled or unscheduled PTO if such a request will conflict with the needs of the business. The Company also reserves the right to request medical documentation to support an employee's request for scheduled or unscheduled PTO related to medical reasons.

Use of PTO

The maximum of forty (40) hours of unused PTO can be carried over from year to year and will not be paid out at the end of the calendar year or upon separation of employment, except where otherwise required by law. In addition, employees are not permitted to take an advance against unearned PTO.

Employees who work more than the standard forty (40) hour work week, and have requested PTO within the same week, will NOT be paid out PTO in excess of forty (40) hours. If PTO has been requested, and the total hours exceed forty (40) for the workweek, Zenith Home Loans will remove the PTO hours requested in excess of forty (40) hours, and will credit back the employee's PTO bank, so no benefit is lost.

PTO must be taken concurrently with any approved unpaid leave including but not limited to FMLA leave and any waiting period prior to payment of leave under the Company's Short-Term Disability policy. If an employee exhausts his/her available short-term disability pay and remains on leave and medically unable to work, then the employee must use any remaining unused PTO.

PTO Donations

Zenith Home Loans understands that there may be situations that arise where PTO may not be available in times of need. The Company permits PTO donations for all eligible employees. Donated leave cannot be held by the recipient. All donations must be given on a one-to-one personal basis. The following applies to the Company's Donation Policy:

- An employee cannot donate more than their annual PTO accrual amount.
- The minimum donation is 8 hours.
- The receiving party must exhaust all accrued PTO leave or any other paid time off before using any donated shared leave.
- All PTO donations must be requested through HR (hr@vipmtginc.com) with the following information: Name of Recipient, intended use date of the recipient, and cause for the donation.
- All donation requests must be submitted by the payroll period end date, prior to the pay date the donation will be used for.

Changes/Modifications to the PTO Plan

The Company reserves the right to make changes or modifications to this PTO policy at its sole discretion, with or without advance notice to its employees.

8-5. VOLUNTEER TIME

In an effort to give back to our local communities, Zenith Home Loans will provide all regular full-time employees with 16 hours of paid volunteer time per calendar year, which can be taken 90-days after the employee's start date. Volunteer time will be paid out at the employee's hourly rate of pay, or per hour salary rate of pay. Employees must submit an electronic request to their manager for all requested volunteer time via electronic time-off portal. Volunteer time may not be taken by an employee until the request has been approved by his/her manager prior to being taken.

The volunteer time benefit is an extension of our core values and serves as a way for us to engage in and support our local communities. In our efforts to stay aligned with our core values, volunteer

time events such as school field trips or school-related functions, will not be approved, unless the field trip and/or function being attended is directly in support of, or benefits the local community. Upon approval for volunteer time, the employee may be required to provide proof of attendance for the volunteer event. Specifically, for the time and date requested for the volunteer event. Acceptable items for proof of attendance are pictures of the employee at the volunteer event, or informational materials indicating the name of event, date and time of event.

Volunteer time must be taken within normal business days and hours, within the calendar year issued, and will not roll over to the next calendar year. Volunteer time may not be taken during weekends, unless the department's workload does not permit one to take volunteer time during regular business days and hours. In the event that this occurs, weekend approval must be reviewed and approved prior to being taken by Management. Volunteer time will not be paid out if not used or upon termination of employment. Hours paid as Volunteer time pay will not be included in total number of hours worked for overtime calculations.

8-6. EMPLOYEE BENEFITS

The Company offers competitive benefits for full-time employees. Coverage is effective first of the month following 30 days of employment. The Company currently offers medical, dental, vision, long-term disability, short-term disability, and life insurance, Employee Assistance Program, and 401k.

We encourage such employees to become familiar with these benefits as they represent a significant part of the total compensation and benefits program. Please refer to your insurance booklet (PSD) or contact Human Resources for additional details. Although the Company intends to continue its tradition of comprehensive benefits to qualified employees, it reserves the right to change or discontinue any of these plans at any time and for any reason.

8-7. BENEFITS CONTINUATION (COBRA)

The Consolidated Omnibus Budget Reconciliation Act of 1985 (COBRA) provides employees and their qualified beneficiaries the opportunity to continue health insurance under the Company's health plan when a "qualifying event" would normally result in the loss of eligibility. Qualifying events include the following:

- Resignation
- Termination of employment if for reasons other than the employee's gross misconduct
- Death of an employee
- Reduction in an employee's hours resulting in loss of coverage
- Employee's divorce or legal separation
- Dependent child no longer meeting eligibility requirements
- Entitlement to Medicare

Medical and Life Insurance coverage for employees and their eligible dependents ends on the date in which the qualifying event occurred. All other coverage for employees and their eligible dependents ends on the last day of the month in which the qualifying event occurred. Depending on the qualifying event, coverage may continue for up to 18 months or 36 months from the date coverage ends. Notification of the premium rates will be provided when employees are eligible for

benefits.

If a dependent is no longer eligible for health insurance coverage, in order to qualify for COBRA, you must notify Human Resources within 60 days of a qualifying event. Under COBRA, the employee (or beneficiary) pays the full cost of coverage at the Company's group rates plus an administration fee. The cost is subject to change if the group rates increase or decrease. If payment is not received within 30 days of the payment due date, then the coverage will be terminated immediately. If coverage is terminated, the employee will be notified by mail.

Section 9 - LEAVES OF ABSENCE

9-1. BEREAVEMENT LEAVE

Regular full-time and part-time employees will be paid up to four (4) consecutive days of leave to grieve, attend the funeral of, or handle related personal affairs of a member of their immediate and non-immediate family, as defined below. Unpaid time off to attend a funeral of a non-relative may be granted at your manager's discretion, or you may be permitted to use PTO, again at your manager's discretion.

Immediate family members are defined as:

Mother, father, child, spouse, domestic partner, brother, sister, grandmother, grandfather, grandchild, mother-in-law, father-in-law, stepchild, stepmother, stepfather, stepbrother, and stepsister.

Non-Immediate family members are defined as:

Uncle, aunt, cousin, niece, nephew, sister-in-law, and brother-in-law

9-2. PERSONAL LEAVE

If employees are ineligible for any other Company leave of absence, Zenith Home Loans, LLC, under certain circumstances, may grant a personal leave of absence without pay. A written request for a personal leave should be presented to management at least two (2) weeks before the anticipated start of the leave. If the leave is requested for medical reasons and employees are not eligible for leave under the federal Family and Medical Leave Act (FMLA) or any state leave law, medical certification also must be submitted. The request will be considered on the basis of staffing requirements and the reasons for the requested leave, as well as performance and attendance records. Normally, a leave of absence will be granted for a period of up to eight (8) weeks. However a personal leave may be extended if, prior to the end of leave, employees submit a written request for an extension to management and the request is granted. During the leave, employees will not earn vacation, personal days or sick days. Zenith Home Loans, LLC will continue health insurance coverage during the leave if employees submit their share of the monthly premium payments to the Company in a timely manner, subject to the terms of the plan documents.

When the employees anticipate returning to work, they should notify management of the expected return date. This notification should be made at least one (1) week before the end of the leave.

Upon completion of the personal leave of absence, the Company will attempt to return employees to their original job or a similar position, subject to prevailing business considerations. Reinstatement, however, is not guaranteed.

Failure to advise management of availability to return to work, failure to return to work when notified or a continued absence from work beyond the time approved by the Company will be considered a voluntary resignation of employment.

Personal leave runs concurrently with any Company-provided Short-Term Disability Leave of

Absence.

9-3. JURY DUTY

This benefit is available to all full-time and all part-time employees.

Regular full-time and part-time, exempt and non-exempt employees, who are summoned for jury duty, will be paid their normal rate of pay if jury duty for a maximum of ten (10) working days of service per calendar year, except otherwise prohibited or required by law.

Your manager must receive a copy of the jury summons immediately after it is received so that operation requirements may be adjusted to accommodate the employee's absence. Evidence of appearance on the assigned day should also be presented to the manager. The employee must contact his/her supervisor on a daily basis and is expected to return to work whenever the court schedule permits. If, in the Company's judgment, the employee's absence would create serious operational difficulties, it may be necessary to request the employee be excused from jury duty.

The Company's pay will cover only the period or periods that any citizen may be required by law at a minimum to serve, so that any employee volunteering further services does so without the benefit of the Company's pay.

9-4. VOTING LEAVE

In the event employees do not have sufficient time outside of working hours to vote in a statewide election, if required by state law, the employee may take off enough working time to vote. Such time will be paid if required by state law.

Most employees will have three (3) consecutive hours during polling hours available outside their normal work schedule. These employees will not be eligible to take any additional time off for voting purposes.

Employees who do not have three (3) consecutive hours available during polling hours outside their normal work schedule must request time off for voting in writing PRIOR to the day of the election. The request for leave must clearly state the employee needs time off in order to vote. The employee may request time off at the beginning or end of their workday that, when added to the time difference between workday hours and opening or closing of the polls, will provide a total of three consecutive hours. The Company may specify the hours during which the employee may be absent.

No deductions will be made from wages or salaries and employees will not be expected to make up the missed work hours. Employees will not be disciplined for taking voting leave or for failing to vote.

9-5. MILITARY LEAVE

If employees are called into active military service or enlist in the uniformed services, they will be eligible to receive an unpaid military leave of absence. To be eligible for military leave, employees must provide management with advance notice of service obligations unless they are prevented from providing such notice by military necessity or it is otherwise impossible or unreasonable to provide such notice. Provided the absence does not exceed applicable statutory limitations, employees will retain reemployment rights and accrue seniority and benefits in accordance with applicable federal

and state laws. Employees should ask management for further information about eligibility for Military Leave.

If employees are required to attend yearly Reserves or National Guard duty, they can apply for an unpaid temporary military leave of absence not to exceed the number of days allowed by law (including travel). They should give management as much advance notice of their need for military leave as possible so that Zenith Home Loans, LLC can maintain proper coverage while employees are away.

9-6. COLORADO FAMILY CARE ACT

Under Colorado's Family Care Act (CFCA), Colorado employees are entitled to take 12 weeks of unpaid leave to care for the employee's (i) partner in a civil union, (ii) registered domestic partner, or (iii) domestic partner recognized by the company, who has a serious health condition. Leave rights under the CFCA are similar to those available under the FMLA, so please refer to the Company's FMLA policy only for information regarding employee eligibility, employee notice requirements, benefits, medical certifications, benefits continuation, and job restoration rights. Additionally, the company requires the employee seeking leave under the CFCA to provide reasonable documentation of the employee's relationship with the civil union or domestic partner. The company will follow those procedures and policies unless they conflict with applicable state law.

9-7. FAMILY AND MEDICAL LEAVE ACT (FMLA)

General Provisions

It is the policy of the Company to grant up to 12 weeks of family and medical leave during any 12-month period to eligible employees, in accordance with the Family and Medical Leave Act of 1993 (FMLA) and up to 26 weeks of leave in any 12-month period in compliance with the expansion of FMLA under The Support for Injured Service Members Act of 2007. The leave may be paid, unpaid or a combination of paid and unpaid leave, depending on the circumstances of the leave and as specified in this policy.

Eligibility

To qualify to take family or medical leave under this policy, the employee must meet all of the following conditions:

1. The employee must have worked for the Company for 12 months or 52 weeks. The 12 months or 52 weeks need not have been consecutive. For eligibility purposes, an employee will be considered to have been employed for an entire week even if the employee was on the payroll for only part of the week or if the employee is on leave during the week.
2. The employee must have worked at least 1,250 hours during the 12-month period immediately before the date when the leave is requested to commence. The principles established under the Fair Labor Standards Act (FLSA) determine the number of hours worked by an employee.
3. The FLSA does not include time spent on paid or unpaid leave as hours worked. Consequently, these hours of leave should not be counted in determining the 1,250 hours eligibility test for an employee under FMLA.

Type of Leave Covered

To qualify as FMLA leave under this policy, the employee must be taking leave for one of the reasons listed below:

1. *The birth of a child and in order to care for that child.*
2. *The placement of a child for adoption or foster care and to care for the newly placed child.*
3. *To care for a spouse, child or parent with a serious health condition.*
4. *The serious health condition (described below) of the employee.*

An employee may take leave because of a serious health condition that makes the employee unable to perform the functions of the employee's position.

A serious health condition is defined as a condition that requires inpatient care at a hospital, hospice or residential medical care facility, including any period of incapacity or any subsequent treatment in connection with such inpatient care or a condition that requires continuing care by a licensed health care provider. This policy covers illnesses of a serious and long-term nature, resulting in recurring or lengthy absences. Generally, a chronic or long-term health condition, which, if left untreated, would result in a period of incapacity of more than three days, would be considered a serious health condition.

Employees with questions about what illnesses are covered under this FMLA policy or under the Company's sick leave policy are encouraged to consult with Human Resources. The Company may require an employee to provide a doctor's certification of the serious health condition. The certification process is outlined below.

If an employee takes paid sick time for a condition that progresses into a serious health condition and the employee requests unpaid leave as provided under this policy, the Company may designate all or some portion of related leave taken as leave under this policy, to the extent that the earlier leave meets the necessary qualifications.

An employee whose spouse, son, daughter or parent either has been notified of an impending call or order to active military duty or who is already on active duty may take up to 12 weeks of leave for reasons related to or affected by the family member's call-up or service. Reasons related to the call-up or service includes helping the family member prepare for the departure or caring for children of the service member. The leave may commence as soon as the individual receives the call-up notice. (Son or daughter for this type of FMLA leave is defined the same as for child for other types of FMLA leave, except the person does not have to be a minor.) This type of leave would be counted toward the employee's 12-week maximum of FMLA leave in a 12-month period.

Employees requesting this type of FMLA leave must provide proof of the qualifying family member's call-up or active military service before leave is granted.

This leave may extend to up to 26 weeks in a 12-month period for an employee whose spouse, son, daughter, parent or next-of-kin is injured or recovering from an injury suffered while on active military duty and who is unable to perform the duties of the service member's office, grade, rank or rating. Next-of-kin is defined as the closest blood relative of the injured or recovering service member. An employee is also eligible for this type of leave when the family service member is receiving medical treatment, recuperation or therapy, even if the service member is on temporary disability retired list or is a veteran who is undergoing medical treatment, recuperation or therapy for serious injury or

illness that occurred any time during the five (5) years preceding the date of treatment.

Employees requesting this type of FMLA leave must provide certification of the family member or next- of-kin's injury, recovery or need for care. This certification is not tied to a serious health condition as for other types of FMLA leave. This is the only type of FMLA leave that may extend an employee's leave entitlement beyond 12 weeks to 26 weeks. Other types of FMLA leave are included with this type of leave totaling the 26 weeks.

An eligible employee can take up to 12 weeks (or up to 26 weeks of leave to care for an injured or ill service member) under this policy during any 12-month period. The Company will measure the 12-month period as a rolling 12-month period measured backward from the date an employee uses any leave under this policy. Each time an employee takes leave, the Company will compute the amount of leave the employee has taken under this policy in the last 12 months and subtract it from the 12 weeks (or 26 weeks for the care of an injured or ill service member) of available leave, with the balance remaining being the amount the employee is entitled to take at that time.

If a husband and wife both work for the Company and each wishes to take leave for the birth of a child, adoption or placement of a child in foster care, or to care for a parent (but not a parent in-law) with a serious health condition, the husband and wife may only take a combined total of 12 weeks of leave. If a husband and wife both work for the Company and each wishes to take leave to care for a covered injured or ill service member, the husband and wife may only take a combined total of 26 weeks of leave.

Employee Status and Benefits During Leave

While an employee is on leave, the Company will continue the employee's health benefits during the leave period at the same level and under the same conditions as if the employee had continued to work. If the employee chooses not to return to work for reasons other than a continued serious health condition of the employee or the employee's family member or a circumstance beyond the employee's control, the Company will require the employee to reimburse the company the amount it paid for the employee's health insurance premium during the leave period.

Under current company policy, the employee pays a portion of the health care premium. While on paid leave, the Company will continue to make payroll deductions to collect the employee's share of the premium. While on unpaid leave, the employee must continue to make this payment, either in person or by mail. The payment must be received in Human Resources by the first day of each month. If the payment is more than 30 days late, the employee's health care coverage may be dropped for the duration of the leave. The Company will provide 15 days' notification prior to the employee's loss of coverage.

If the employee contributes to a life insurance or disability plan, the Company will continue making payroll deductions while the employee is on paid leave. While the employee is on unpaid leave, the employee may request continuation of such benefits and pay their portion of the premiums; or the Company may elect to maintain such benefits during the leave and pay the employee's share of the premium payments. If the employee does not continue these payments, the employer may discontinue coverage during the leave. If the Company maintains coverage, the Company may recover the costs incurred for paying the employee's share of any premiums whether or not the employee returns to work.

Employee Status after Leave

An employee who takes leave under this policy will be able to return to the same position or a

position with equivalent status, pay, benefits and other employment terms. The position will be the same or virtually identical in terms of pay, benefits and working conditions.

The Company may choose to exempt certain key employees from this requirement and not return them to the same or similar position.

Use of Paid and Unpaid Leave

Paid time off may be run concurrently with FMLA leave if the reason for the FMLA leave is covered by the established paid time off leave policy.

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.

An employee who is taking leave for the adoption or foster care of a child must use all paid vacation prior to being eligible for unpaid leave.

Intermittent Leave or a Reduced Work Schedule

The employee may take FMLA leave in 12 consecutive weeks, may use the leave intermittently (take a day periodically when needed over the year) or, under certain circumstances, may use the leave to reduce the workweek or workday, resulting in a reduced hours schedule. In all cases, the leave may not exceed a total of 12 work weeks (or 26 workweeks to care for an injured or ill service member over a 12-month period).

The Company may temporarily transfer an employee to an available alternative position with equivalent pay and benefits if the alternative position would better accommodate the intermittent or reduced schedule, in instances when leave for the employee or employee's family member is foreseeable and for planned medical treatment, including recovery from a serious health condition or to care for a child after birth, or placement for adoption or foster care.

For the birth, adoption or foster care of a child, the Company and the employee must mutually agree to the schedule before the employee may take the leave intermittently or work a reduced hours schedule. Leave for birth, adoption or foster care of a child must be taken within one year of the birth or placement of the child.

If the employee is taking leave for a serious health condition or because of the serious health condition of a family member, the employee should try to reach an agreement with the Company before taking intermittent leave or working a reduced hours schedule. If this is not possible, then the employee must prove that the use of the leave is medically necessary. The Company may require certification of the medical necessity.

Certification of the Serious Health Condition

The Company may ask for certification of the serious health condition. The employee must respond to such a request within 15 days of the request or provide a reasonable explanation for the delay. Failure to provide certification may result in a denial of continuation of leave. Medical certification may be provided by using the Medical Certification Form. Request for a medical certificate must be made in writing as part of the employer response to employee request for leave.

Documentation of the Need for Service Member FMLA Leave

Employees requesting this type of Service member FMLA leave must provide documentation of the

family member's or next-of-kin's injury, recovery or need for care. This documentation may be a copy of the military medical information, orders for treatment, or other official Armed Forces communication pertaining to the service member's injury or illness incurred on active military duty that renders the member medically unfit to perform his or her military duties.

Procedure for Requesting Leave for 1) the birth of a child or in order to care for that child; 2) the placement of a child for adoption or foster care and to care for the newly placed child; 3) to care for a spouse, child or parent with a serious health condition; or 4) the serious health condition of the employee. All employees requesting this type of FMLA leave must provide verbal notice with an explanation of the reason(s) for the needed leave to their immediate supervisor, who will advise Human Resources. If the leave is foreseeable, the immediate supervisor may require the employee to provide a written request for leave and reasons(s) with a copy to Human Resources. Failure of the employee to provide a written request for leave cannot be grounds to deny or delay the taking of FMLA leave.

The Company will provide individual notice of rights and obligations to each employee requesting leave within two business days or as soon as practicable. For employees on intermittent or recurring leave for the same incident, this notice will be provided every six months.

When an employee plans to take leave under this policy, the employee must give the Company 30 days' notice. If it is not possible to give 30 days' notice, the employee must give as much notice as is practicable. An employee who is to undergo planned medical treatment is required to make a reasonable effort to schedule the treatment in order to minimize disruptions to the Company's operations.

If an employee fails to provide 30 days' notice for foreseeable leave with no reasonable excuse for the delay, the leave request may be denied until at least 30 days from the date the Company receives notice. While on leave, employees are requested to report periodically to the Company regarding the status of the medical condition and their intent to return to work.

Procedure for Requesting Leave for 1) a covered family member's active duty or call to active duty in the Armed Forces or 2) to care for an injured or ill service member. All employees requesting this type of FMLA leave must provide verbal notice with an explanation of the reason(s) for the needed leave to their immediate supervisor, who will advise Human Resources. Leave may commence as soon as the individual receives the call-up notice. If the leave is foreseeable, the immediate supervisor may require the employee to provide a written request for leave and reasons(s) with a copy to Human Resources.

The Company will provide individual notice of rights and obligations to each employee requesting leave within two business days or as soon as practicable.

9-8. LEAVE FOR VOLUNTEER FIRE FIGHTERS

Volunteer firefighter employees that have previously provided the Company with documentation from the Chief of the Fire Department that the employee is a volunteer firefighter and that the Company has determined are not "essential employees" as defined in C.R.S. §13-30-1131, will receive unpaid leave for responding to an emergency summons issued by the Fire Chief. Following the leave, Employees must provide a written statement from the Fire Chief verifying the time, date and duration of the employee's absence and confirming that the absence was due to the emergency summons.

Employees will not be given more than 15 days leave in a calendar year to attend to Voluntary Fire Fighter duties.

9-9. LEAVE FOR VOLUNTEERS FOR DISASTER RESPONSE (QUALIFIED VOLUNTEERS)

An employee who is a qualified volunteer who is called into service by a volunteer organization for disaster response may be entitled to up to a 15-day unpaid leave of absence per calendar year for the time when the qualified volunteer is called into service for a disaster. A qualified volunteer is a member of a volunteer organization that has entered into a memorandum of understanding with a county sheriff, local government, local emergency planning committee, or state agency to assist with providing services during disasters. The volunteer organization must be included on the list maintained by the State Department of Local Affairs. Eligible employees must provide to their supervisor verification of their service during the disaster and return to work as soon as practicable after being relieved from emergency volunteer service. This leave is not available to essential employees.

Section 10 - LEAVING ZENITH HOME LOANS

10-1. IF YOU MUST LEAVE US

RESIGNATION

In the event an employee wishes to terminate his or her employment, the Company asks that the employee discuss the situation with management before making a final decision. If the decision is still made to resign, the Company would prefer the professional courtesy of a two (2) weeks written notice. Written notice should state the reason for resignation and the employee's last day of work. PTO time may not be taken in lieu of the notice period.

INVOLUNTARY TERMINATIONS

Discharge may be for any reason, i.e., failure to adhere to a policy of this handbook, misconduct, tardiness, absenteeism, unsatisfactory performance, etc. In some cases, progressive discipline may be used, prior to termination, to correct a performance problem. However, certain types of employee misconduct are so severe that one incident of misconduct will result in immediate dismissal without prior use of progressive discipline.

FINAL PAYCHECK

It is the responsibility of the employee's supervisor to ensure the terminating employee's timecard is completed and approved so the Payroll office has sufficient time to process the final paycheck.

Employees who voluntarily and involuntarily resign will receive their final paycheck on the next scheduled pay date, unless State law requires differently.

SOLICITATION OF EMPLOYEES

After separation of employment individuals shall not induce, encourage or attempt to induce any employee of the Company to leave, or in any way interfere with the relationship between the Company and any employee.

REHIRE

Former employees who left the Company in good standing and were classified as eligible for rehire may be considered for reemployment. An application must be submitted to Human Resources and the applicant must meet all minimum qualifications and requirements of the position. Rehired employees begin benefits just as any other new employee. Previous tenure will not be considered in calculating longevity, leave accruals or any other benefits.

10-2. REFERENCES

Zenith Home Loans, LLC will respond to reference requests through the Human Resources Department. The Company will provide general information concerning the employee such as date of hire, date of discharge, and positions held. Requests for reference information must be in writing, and responses will be in writing. Please refer all requests for references to the Human Resources Department.

10-3. EXIT INTERVIEWS

Employees who resign may be asked for their comments concerning their experience at the Company during exit interviews. This feedback assists the Company in evaluating policies, procedures, benefits, work environment and other variables affecting the employment experience.

10-4. A FEW CLOSING WORDS

This handbook is intended to give employees a broad summary of things they should know about Zenith Home Loans, LLC. The information in this handbook is general in nature and, should questions arise, any member of management should be consulted for complete details. While we intend to continue the policies, rules and benefits described in this handbook, Zenith Home Loans, LLC, in its sole discretion, may always amend, add to, delete from or modify the provisions of this handbook and/or change its interpretation of any provision set forth in this handbook. Employees should not hesitate to speak to management if they have any questions about the Company or its personnel policies and practices.

Section 11 - COLORADO ADDENDUM

11-1. PREGNANCY ACCOMMODATIONS

In compliance with Colorado law, Zenith Home Loans, LLC will not discriminate against employees because of pregnancy, childbirth or related conditions. If employees request reasonable accommodation due to health conditions related to pregnancy or the physical recovery from childbirth, the Company will endeavor to provide a reasonable accommodation to enable applicants and employees to perform the essential functions of the job, unless the accommodation would impose an undue hardship on the operation of the business. The Company will engage in a timely, good faith, and interactive process with the employee to determine effective, reasonable accommodations for conditions related to pregnancy, physical recovery from childbirth or a related condition.

Reasonable accommodations may include, but are not limited to: more frequent or longer break periods; more frequent restroom, food and water breaks; acquisition or modification of equipment or seating; limitations on lifting; temporary transfer to a less strenuous or hazardous position if available, with return to the current position after pregnancy; job restructuring; light duty, if available; assistance with manual labor; or modified work schedules.

The Company will not require employees affected by pregnancy, physical recovery from childbirth or a related condition to accept an accommodation that they choose not to accept if they did not request an accommodation or if the accommodation is not necessary for the employees to perform the essential functions of the job, nor will the Company require a pregnant employee to take leave if another reasonable accommodation is available which will permit the employee to continue working.

The Company reserves the right to require employees to provide a note stating the necessity of a reasonable accommodation from a licensed health care provider before providing a reasonable accommodation.

The Company will not take adverse action against pregnant employees who request or use a reasonable accommodation related to pregnancy, physical recovery from childbirth or a related condition. The Company will not deny employment opportunities to employees based on the need to make a reasonable accommodation related to pregnancy, physical recovery from childbirth or a related condition.

If employees have any questions about this policy or would like to request a reasonable accommodation, they should contact the Head of Human Resources.

11-2. OVERTIME

Non-exempt Colorado employees are entitled to overtime pay at one and one-half times (1.5) their regular rate of pay for all hours worked in excess of 12 hours in a day, 12 hours consecutively (without regard to the starting and ending time of the workday), or 40 hours per workweek, whichever calculation results in the greater payment of wages. Time paid but not worked, such as sick time or paid time off (PTO), will not be counted as hours worked in calculating hours worked for purposes of determining if overtime pay is due.

Please review the Colorado Overtime and Minimum Pay Standards (COMPS) Order for information regarding your rights under Colorado law, available [here](#). The Head of Human Resources will provide an acknowledgment form to sign indicating you have received the COMPS Order.

11-3. PAID SICK LEAVE

Eligibility

Zenith Home Loans, LLC provides paid sick leave to all employees. For employees who work in Colorado who are eligible for sick leave under the general paid Sick Days policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general paid sick days policy and/or any other applicable sick time/leave law or ordinance.

Accrual

Employees begin accruing paid sick leave pursuant to this policy on January 1, 2021 or at the start of employment, whichever is later. Employees will accrue one (1) hour of paid sick leave for every 30 hours worked, up to a maximum accrual of 48 hours each year.

Exempt employees are assumed to work 40 hours in each workweek unless their normal workweek is less than 40 hours, in which case paid sick leave accrues based on that normal workweek.

For purposes of this policy, the year is the consecutive 12-month period beginning January 1 and ending on December 31.

Usage

Employees may begin using accrued paid sick leave immediately. Paid sick leave may be used in hourly increments. Employees may not use more than 48 hours of accrued paid sick leave in any year.

Employees may use accrued paid sick leave for the following reasons:

1. mental or physical illness, injury or health condition that prevents the employee from working; the need to obtain a medical diagnosis, care or treatment of a mental or physical illness, injury or health condition; or the need to obtain preventive medical care;
2. to care for a family member who has a mental or physical illness, injury or health condition; needs to obtain a medical diagnosis, care or treatment of a mental or physical illness, injury or health condition; or needs to obtain preventive medical care;
3. the employee or a family member has been the victim of domestic abuse, sexual assault or harassment and the use of leave is to:
 - seek medical attention to recover from a mental or physical illness, injury or health condition caused by the domestic abuse, sexual assault or harassment;
 - obtain services from a victim services organization;
 - obtain mental health or other counseling;
 - seek relocation due to the domestic abuse, sexual assault or harassment; or
 - seek legal services, including preparation for or participation in a civil or criminal proceeding relating to or resulting from the domestic abuse, sexual assault or

harassment;

4. due to a public health emergency, a public official has ordered closure of the employee's place of business or the school or place of care of the employee's child and the employee needs to be absent from work to care for the child.

For purposes of this policy, "family member" means a person who is related to the employee by blood, marriage, civil union or adoption; a child to whom the employee stands in loco parentis or a person who stood in loco parentis when the employee was a minor; or a person for whom the employee is responsible for providing or arranging health- or safety-related care.

Use of paid sick leave will not be conditioned upon the employee searching for or finding a replacement worker.

Unless advised otherwise, the Company will assume, subject to applicable law, that employees want to use available paid sick leave for reasons set forth above. Employees will be paid for such absences to the extent they have paid sick leave available.

Notice and Documentation

Paid sick leave may be requested orally, in writing, electronically or by any other means acceptable to the Company. When possible, employees should include the expected duration of the absence. If the need is foreseeable employees must provide reasonable advance notice to the Head of Human Resources and/or their Manager of the need to use accrued paid sick leave, and also make a reasonable effort to schedule the paid sick leave in a manner that does not unduly disrupt Company operations. Where the need is not foreseeable, employees should provide notice as early as practicable.

For paid sick leave of four (4) or more consecutive work days, the Company may require reasonable documentation that the paid sick leave was used for an authorized purpose. The Company will not require the disclosure of details relating to domestic violence, sexual assault or stalking or the details of the employee's or family member's health information as a condition of providing paid sick leave.

Payment

Paid sick leave will be paid at the same hourly rate or salary and with the same benefits, including health care benefits, as the employee normally earns during hours worked. Use of paid sick leave is not considered hours worked for purposes of calculating overtime.

Carryover and Payout

Employees may carry over up to 48 hours of accrued, unused paid sick leave to the following calendar year. Accrued but unused paid sick leave will not be paid at separation.

Additional Public Health Emergency Paid Sick Leave

In addition to accrued paid sick leave explained above, on the date a public health emergency is declared, the Company will supplement each employee's accrued paid sick leave as necessary to ensure that the employee may take paid sick leave as follows:

- employees who normally work 40 or more hours in a week may take at least 80 hours of paid sick leave in a public health emergency;
- employees who normally work fewer than 40 hours in a week may take at least the greater of

either the amount of time the employee is scheduled to work in a 14-day period or the amount of time the employee actually works on average in a 14-day period.

The Company may count unused accrued paid sick leave, as explained above, toward the supplemental paid sick leave required for a public health emergency. Employees may use public health emergency paid sick leave until four (4) weeks after the official termination or suspension of the public health emergency. Employees may use public health emergency paid sick leave for the following absences related to a public health emergency:

1. to self-isolate and care for oneself when diagnosed with a communicable illness that is the cause of a public health emergency; self-isolate and care for oneself when experiencing symptoms of a communicable illness that is the cause of a public health emergency; seek or obtain medical diagnosis, care or treatment if experiencing symptoms of a communicable illness that is the cause of a public health emergency; seek preventive care concerning a communicable illness that is the cause of a public health emergency;
2. to care for a family member who is self-isolating after being diagnosed with a communicable illness that is the cause of a public health emergency; is experiencing symptoms of a communicable illness that is the cause of a public health emergency; needs medical diagnosis, care or treatment if experiencing symptoms of a communicable illness that is the cause of a public health emergency; or is seeking preventive care concerning a communicable illness that is the cause of a public health emergency;
3. with respect to a communicable illness that is the cause of a public health emergency:
 - a local, state or federal public official or health authority having jurisdiction over the location in which the Company is located or the Company determines that the employee's presence on the job or in the community would jeopardize the health of others because of the employee's exposure to the communicable illness or because the employee is exhibiting symptoms of the communicable illness, regardless of whether the employee has been diagnosed with the communicable illness; or
 - care of a family member after a local, state or federal public official or health authority, having jurisdiction over the location in which the family member's place of employment is located, or the family member's employer determines that the family member's presence on the job or in the community would jeopardize the health of others because of the family member's exposure to the communicable illness, or because the family member is exhibiting symptoms of the communicable illness, regardless of whether the family member has been diagnosed with the communicable illness;
4. care of a child or other family member when the individual's child care provider is unavailable due to a public health emergency, or if the child's or family member's school or place of care has been closed by a local, state or federal public official or at the discretion of the school or place of care due to a public health emergency, including if a school or place of care is physically closed but providing instruction remotely;
5. inability to work because the employee has a health condition that may increase susceptibility to or risk of a communicable illness that is the cause of the public health emergency.

Employees must notify the Company of the need for public health emergency paid sick leave as soon as practicable when the need for paid sick leave is foreseeable and the Company's place of business has not been closed. Documentation is not required to take public health emergency paid

sick leave.

Public health emergency paid sick leave in the amount described above may be taken once during the entirety of a public health emergency even if such public health emergency is amended, extended, restated or prolonged.

Enforcement and Retaliation

The Company cannot retaliate against employees for requesting or using paid sick leave and employees have the right to file a complaint with the Division of Labor Standards and Statistics in the Colorado Department of Labor and Employment or bring a civil action if paid sick leave is denied by the Company or the Company retaliates against employees for exercising their rights under applicable law.

If employees have any questions regarding this policy, they should contact the Head of Human Resources and/or Benefits Administrator.

Section 12 - WASHINGTON ADDENDUM

12-1. PREGNANCY ACCOMMODATIONS

In compliance with Washington law, Zenith Home Loans, LLC will not discriminate against the employee in relation to pregnancy and pregnancy-related health conditions. The Company will endeavor to provide reasonable accommodations for conditions related to pregnancy and pregnancy-related health conditions, including the need to express breast milk. Reasonable accommodations include:

1. providing more frequent, longer or flexible restroom breaks;
2. modifying a no food or drink policy;
3. job restructuring, part-time or modified work schedules, reassignment to a vacant position or acquiring or modifying equipment, devices or the employee's work station;
4. providing seating or allowing the employee to sit more often if the employee's job requires the employee to stand;
5. providing for a temporary transfer to a less strenuous or less hazardous position;
6. providing assistance with manual labor and limits on lifting;
7. scheduling flexibility for prenatal visits;
8. providing reasonable break time for an employee to express breast milk each time the employee needs to express the milk and providing a private location, other than a bathroom; and
9. any further pregnancy accommodation the employee may request, and to which the Company must give reasonable consideration in consultation with information provided on pregnancy accommodation by the Washington Department of Labor and Industries or the attending health care provider of the employee.

The Company may request that the employee provide a written certification from the employee's treating health care professional regarding the need for reasonable accommodation except for accommodations listed in points 1, 2, 4, and 8 above or limits on lifting in point 6 of more than 17 pounds. The employer may refuse accommodations listed in points 3, 5, 6 (for lifting, only if involves 17 pounds or less), 7, 8, and 9 if the accommodation would pose an undue hardship on the Company's program, enterprise or business.

The Company is not required to create additional employment that would not otherwise have been created or discharge any employee, transfer any employee with more seniority or promote any employee who is not qualified to perform the job, unless the Company does so or would do so for other classes of employees who need accommodation.

The Company will not take adverse action against the employee who requests, declines or uses an accommodation under this policy. Further, the Company will not deny employment opportunities to an otherwise qualified employee or prospective employee if such denial is based on the Company's need to reasonably accommodate the employee's or prospective employee's condition related to pregnancy, childbirth or a related medical condition. Additionally, the Company will not require the employee to take leave if another reasonable accommodation can be provided for the employee's pregnancy and pregnancy-related health conditions.

If employees have any questions about or would like to request a reasonable accommodation pursuant to this policy, they should contact the Head of Human Resources.

12-2. PAID SICK LEAVE

Eligibility

The Company provides paid sick leave to non-exempt employees who work in Washington. For non-exempt employees who work in Washington who are eligible for sick time under the general Sick Days policy and/or any other applicable sick time/leave law or ordinance, this policy applies solely to the extent it provides greater benefits/rights on any specific issue or issues than the general Sick Days policy and/or any other applicable sick time/leave law or ordinance.

Accrual

Employees begin accruing paid sick leave pursuant to this policy on January 1, 2018 or at the start of employment, whichever is later. Employees accrue one (1) hour for every 40 hours worked. For purposes of this policy, the accrual period is the consecutive 12-month period beginning on January 1 and ending on December 31.

Usage

Employees may use paid sick leave beginning on the 90th calendar day of employment. Paid sick leave must be used in 1 hour intervals.

Employees may use paid sick leave for absences due to:

- an absence resulting from the employee's mental or physical illness, injury or health condition; to accommodate the employee's need for medical diagnosis, care or treatment of a mental or physical illness, injury or health condition; or the employee's need for preventive medical care;
- to allow the employee to provide care for a family member with a mental or physical illness, injury or health condition; care of a family member who needs medical diagnosis, care or treatment of a mental or physical illness, injury or health condition; or care for a family member who needs preventive medical care;
- when the employee's place of business has been closed by order of a public official for any health-related reason or when the employee's child's school or place of care has been closed for such a reason; or
- an absence covered under Washington's Domestic Violence Leave Act, as addressed further within the Leave for Victims of Domestic Violence.

For purposes of this policy, family member includes:

- a child, including a biological child, adopted child, foster child, stepchild; or a child to whom the employee stands in loco parentis, is a legal guardian of, or is a de facto parent, regardless of age or dependency status;
- a parent, including a biological parent, adoptive parent, de facto parent, foster parent, stepparent, or legal guardian of the employee or the employee's spouse or registered domestic partner, or a person who stood in loco parentis when the employee was a minor child;

- a spouse;
- a registered domestic partner;
- a grandparent;
- a grandchild; or
- a sibling.

The employee's use of paid sick leave will not be conditioned upon searching for or finding a replacement worker.

Unless advised otherwise by the employee, the Company will assume, subject to applicable law, that employees want to use available paid sick leave for absences for reasons set forth above and employees will be paid for such absences to the extent they have paid sick leave available.

The Company may withhold payment of paid sick leave hours where the employee is demonstrated to have used paid sick leave for an uncovered purpose, however, their available paid sick leave hours will not be deducted.

Employees will be notified of their available paid sick leave on each itemized wage statement.

Notice and Documentation

Employees are required to give reasonable notice of an absence from work. Employees should make a reasonable effort to schedule the use of paid sick time in a manner that does not unduly disrupt the Company's operations. Requests to use earned paid leave time may be made orally, in writing, or electronically (e.g., via email), and whenever possible, the request must include the expected duration of the employee's absence. When the use of paid sick leave is foreseeable, the employee is required to make a good faith effort to provide notice of the need for such time to their Manager at least 10 days in advance of the use of the paid sick leave or as soon as practicable. When the use of earned sick time is not foreseeable, the employee is required to provide notice to their Manager as soon as possible before the start of their workday or as soon as practicable under the circumstances. In the event it is impracticable for the employee to provide notice, a person may provide notice on the employee's behalf.

For paid sick leave of more than three (3) consecutive work days, the Company requires documentation verifying that the employee's use of paid sick leave is for an authorized purpose. Documentation must be provided within a reasonable time period during or after the leave. Documentation should not explain the nature of the employee's or a family member's health condition or the details of the domestic violence, sexual violence, abuse or stalking. Employees have the right to assert that the verification requirement results in an unreasonable burden or expenses on the employee. If the employee anticipates that the requirement will result in an unreasonable burden or expense, the employee may provide an oral or written explanation to their Manager which asserts that the employee's use of paid sick leave was for a covered purpose and how the verification requirement creates an unreasonable burden or expense on the employee.

Payment

Paid sick leave will be paid at the same hourly rate the employee earns from their employment at the time the employee uses such time, but no less than the applicable minimum wage, unless otherwise required by applicable law. Use of paid sick leave is not considered hours worked for purposes of calculating overtime.

Carryover and Payout

The employee may carry over up to 40 hours of accrued, unused paid sick leave to the following calendar year. Unused paid sick leave will not be paid at separation.

Enforcement and Retaliation

Retaliation or discrimination against the employee who requests paid sick days or uses paid sick days or both is prohibited, and employees may file a complaint with the Washington State Department of Labor & Industries against an employer who retaliates or discriminates against the employee.

Questions about rights and responsibilities under the law can be answered by the Head of Human Resources and/or Benefits Administrator.

12-3. PAID FAMILY AND MEDICAL LEAVE

Eligibility

Employees who have worked 820 hours in the qualifying period (equal to 16 hours a week for a year) are eligible to apply for paid medical leave or paid family leave (collectively PFML). "Qualifying period" means the first four (4) of the last five (5) completed calendar quarters or, if eligibility is not established, the last four (4) completed calendar quarters immediately preceding the application for PFML. The 820 hours are cumulative, regardless of the number of employers or jobs someone has during a year. All paid work over the course of the year counts toward the 820 hours, including part-time, seasonal, and temporary work.

Entitlement

Beginning January 1, 2020, PFML is available to eligible employees for up to 12 weeks within any 52 consecutive week period. PFML may be used:

- to participate in providing care, including physical or psychological care, for a family member (child, grandchild, grandparent, parent, sibling, spouse, child's spouse or state registered domestic partner) with a serious health condition;
- to bond with the employee's child after the child's birth or after the placement of a child under the age of 18 with the employee;
- because of any qualifying military exigency as permitted under the federal Family and Medical Leave Act (FMLA) for the employee's family member (child, grandchild, grandparent, parent, sibling, spouse, child's spouse or state registered domestic partner of an employee); or
- because of the employee's own serious health condition.

For purposes of the above, unless the context clearly requires otherwise, "child" includes: biological, adopted or foster child; a stepchild or a child to whom the employee stands in loco parentis, is a legal guardian or is a de facto parent regardless of age or dependency status. "Parent" includes biological, adoptive, de facto or foster parent, stepparent or legal guardian of the employee or the employee's spouse or state registered domestic partner or an individual who stood in loco parentis to the employee when the employee was a child.

Qualifying military exigencies may include attending certain military events, arranging for alternative childcare, addressing certain financial and legal arrangements, attending certain counseling sessions, caring for the parents of the military member on covered active duty, and attending post-deployment reintegration briefings.

If the employee faces multiple events in a year, the employee may be eligible to receive up to 16 weeks, and up to 18 weeks if the employee experiences a serious health condition during pregnancy that results in incapacity.

Leave to care for the employee's child after birth, or placement for adoption or foster care must be taken within one (1) year of the child's birth or placement. Leave for any other reason must be taken within one (1) year of the date of which the employee filed an application for the benefits.

These benefits are financed through both employee and Zenith Home Loans, LLC contributions to the PFML program. The Company will calculate and withhold premiums from employees' paychecks and send both employees' shares and the Company's share, if applicable, to ESD on a quarterly basis.

While on PFML, employees are entitled to partial wage replacement at a portion of their average weekly pay. There is a waiting period of up to seven (7) consecutive calendar days of leave, but employees may use any paid time off (including vacation leave, personal leave, medical leave, sick leave, compensatory leave or any other paid leave offered under the Company's established policy) to receive compensation during that waiting period. No waiting period is required where leave is for the birth or placement of a child or for a military exigency. If the employee's average weekly wage is: 50 percent or less of the state average weekly wage, the employee's weekly benefit is 90 percent of the average weekly wage; greater than 50 percent of the of the state average weekly wage, the weekly benefit is the sum of:

- 90 percent of 50 percent of the state average weekly wage; and
- 50 percent of the employee's average weekly wage that is greater than 50 percent of the state average weekly wage.

The maximum weekly benefit for PFML that occurs on or after January 1, 2020 will be \$1,000 per week. This weekly maximum will be adjusted effective January 1 of each subsequent year as determined by the state based on 90 percent of the state's average weekly wage. The minimum weekly benefit will be \$100 per week, except that if the employee's average weekly wage at the time of PFML is less than \$100 per week, the weekly benefit will be the employee's full wage. Employees will be paid benefits directly by ESD rather than by the Company.

In any week in which the employee is eligible to receive benefits under Title 50 (unemployment compensation) or certain provisions of Title 51 (industrial insurance) of the Revised Code of Washington, or any other applicable federal unemployment compensation, industrial insurance or disability insurance laws, the employee is disqualified from receiving PFML.

Definition of a Serious Health Condition

A serious health condition is an illness, injury, impairment or physical or mental condition that involves: inpatient care in a hospital, hospice or residential medical care facility; or continuing treatment by a health care provider. Subject to certain conditions, the continuing treatment requirement may include, but is not limited to:

- a period of incapacity of more than three (3) consecutive, full calendar days, and any subsequent treatment or period of incapacity relating to the same condition;
- any period of incapacity due to pregnancy, or for prenatal care;
- any period of incapacity or treatment for such incapacity due to a chronic serious health condition;
- a period of incapacity which is permanent or long term due to a condition for which treatment may not be effective; or
- any period of absence to receive multiple treatments, including any period of recovery from the treatments, by a healthcare provider or by a provider of health care services under orders of, or on referral by, a health care provider, either for: restorative surgery after an accident or other injury; or a condition that would likely result in a period of incapacity of more than three (3) consecutive, full calendar days in the absence of medical intervention or treatment, such as cancer, severe arthritis or kidney disease.

Use of PFML

Employees do not need to use PFML in one block. PFML can be taken intermittently in minimum increments of eight (8) consecutive hours. PFML taken on an intermittent basis will not result in a reduction of the total amount of PFML to which the employee is entitled beyond the amount of PFML actually taken.

Employee Notice

Employees must provide the Company at least 30 days' written notice before PFML is to begin if the need for PFML is foreseeable based on an expected birth, placement of a child or planned medical treatment for a serious health condition. Employees must provide the Company written notice as soon as is practicable when 30 days' notice is not possible, such as because of a lack of knowledge of approximately when PFML will be required to begin, a change in circumstances or a medical emergency. Employees must provide written notice as soon as is practicable for foreseeable PFML due to a qualifying military exigency, regardless of how far in advance such PFML is foreseeable. When the need for PFML is not foreseeable, employees must provide written notice as soon as is practicable under the facts and circumstances of the particular situation. If the employee is unable to provide notice personally, written notice may be given by another responsible party, such as the employee's spouse, neighbor or coworker.

The employee must provide written notice to make the Company aware that the employee may need PFML. The notice must contain at least the anticipated timing and duration of the PFML. Written notice includes, but is not limited to, handwritten or typed notices, and all forms of written electronic communications such as text messages and email.

Whether PFML is to be continuous or is to be taken intermittently or on a reduced schedule basis, written notice need only be given one time, but the employee must inform the Company as soon as is practicable if dates of the scheduled PFML change, are extended or were initially unknown.

Filing Claims with the ESD

The employee may apply for PFML benefits by:

- using the ESD online services;
- contacting the paid family and medical leave customer care center by telephone; or

- using alternate methods authorized by ESD.

The ESD is solely responsible for determining if an employee is eligible for benefits.

Supplemental Benefits During PFML

The Company does not offer supplemental benefits to employees who are receiving PFML.

Job Benefits and Protection

Employees may keep their health insurance while on PFML. Employees who contribute to the cost of their health insurance must continue to pay their portion of the premium cost while on PFML.

Employees who return from PFML generally will be restored to a same or equivalent job if the Company has 50 or more employees and the employee has worked for the Company for at least 12 months, and has worked 1,250 hours in the 12 months before taking PFML (about 24 hours per week, on average). Otherwise, Employees taking PFML are not guaranteed job reinstatement unless they qualify for such reinstatement under federal and/or state leave laws or other applicable laws.

The use of PFML cannot result in the loss of any employment benefits that accrued prior to the start of PFML.

FMLA Concurrent with PFML

Any time off for PFML purposes will run concurrently with FMLA, if applicable, with the exception of any leave for sickness or temporary disability because of pregnancy or childbirth, which is in addition to leave under PFML. Please see the "Family and Medical Leave" policy for eligibility requirements.

Questions and/or Complaints about PFML

The Company is prohibited from discriminating or retaliating against employees for requesting or taking PFML.

For more information on PFML, employees may go to paidleave.wa.gov or speak with the Head of Human Resources and/or Benefits Administrator.

12-4. LEAVE FOR VICTIMS OF DOMESTIC VIOLENCE

If the employee or the employee's family member is a victim of domestic violence, the employee may be eligible to take reasonable, unpaid time off from work for one or more of the following reasons:

- seek legal or law enforcement assistance or remedies to ensure the health and safety of the employee or a family member including, but not limited to, preparing for or participating in any civil or criminal legal proceeding related to or derived from domestic violence, sexual assault or stalking;
- seek treatment by a health care provider for physical or mental injuries caused by domestic violence, sexual assault or stalking, or to attend to health care treatment for a victim who is a family member;
- obtain or assist a family member in obtaining services from a domestic violence shelter, rape crisis center or other social services program for relief from domestic violence, sexual assault or stalking;

- obtain or assist a family member in obtaining mental health counseling related to an incident of domestic violence, sexual assault or stalking, in which the employee or family member was a victim of domestic violence, sexual assault or stalking; or
- participate in safety planning, temporarily or permanently relocate or take other actions to increase personal safety or that of family members from future domestic violence, sexual assault or stalking.

Employees may elect to use any sick leave or other paid time off for leave pursuant to this policy. Leave may take the form of reasonable unpaid leave from work, intermittent leave or leave on a reduced leave schedule.

Employees wishing to take leave pursuant to this policy must give advance notice of their intention to take leave. When advance notice cannot be given because of an emergency or unforeseen circumstance due to domestic violence, sexual assault or stalking, the employee or a designee must give notice no later than the end of the first day on which such leave is taken.

Verification of the need for leave may be required.

12-5. PREGNANCY AND CHILDBIRTH LEAVE

Employees are eligible to take unpaid leave for the actual period of time that they are sick or temporarily disabled because of pregnancy, childbirth or related medical conditions.

Any employees wishing to request leave because of a pregnancy-related disability must provide appropriate medical certification.

This leave is available regardless of whether the employee qualifies for leave under Zenith Home Loans, LLC's Family & Medical Leave policy. This leave does not count towards the employee's leave entitlement, if any, under the Washington State Paid Family and Medical Leave Act (PFML), but FMLA leave will run concurrently with this leave.

During this leave, employees must use any applicable paid time off benefits that they have available to cover some or all of the absence. Otherwise, the leave will be unpaid. Group health and other benefits will be handled in the same manner as for any other similar pregnancy or non-pregnancy related absence.

If employees take this leave only for the actual period of disability, as certified by their health care provider, then they ordinarily will be allowed to return from this leave to the same job they held when the leave began or to a similar job of at least the same pay. Exceptions to this general rule will be made only if the Company has a business necessity to do otherwise.

If employees have any questions regarding this policy, they should contact the Head of Human Resources and/or Benefits Administrator.

GENERAL HANDBOOK ACKNOWLEDGMENT

This Employee Handbook is an important document intended to help employees become acquainted with Zenith Home Loans, LLC. This document is intended to provide guidelines and general descriptions only; it is not the final word in all cases. Individual circumstances may call for individual attention.

Because the Company's operations may change, the contents of this Handbook may be changed at any time, with or without notice, in an individual case or generally, at the sole discretion of management.

Please read the following statements and sign below to indicate your receipt and acknowledgment of this Handbook.

I have received and read a copy of Zenith Home Loans, LLC's Employees Handbook. I understand that the policies, rules and benefits described in it are subject to change at the sole discretion of the Company at any time.

I further understand that my employment is terminable at will, either by myself or the Company, with or without cause or notice, regardless of the length of my employment or the granting of benefits of any kind.

I understand that no representative of Zenith Home Loans, LLC other than the President and/or the Head of Human Resources may alter "at will" status and any such modification must be in a signed writing.

I understand that my signature below indicates that I have read and understand the above statements and that I have received a copy of the Company's Employee Handbook.

Employee's Printed Name: _____

Employee's Signature: _____

Position: _____

Date: _____

The signed original copy of this acknowledgment should be given to management - it will be filed in your personnel file.

RECEIPT OF NON-HARASSMENT POLICY

It is Zenith Home Loans, LLC's policy to prohibit intentional and unintentional harassment of or against job applicants, contractors, interns, volunteers or employees by another employee, supervisor, vendor, customer or any third party on the basis of actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth and pregnancy-related conditions), gender identity or expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, genetic information or any other characteristic protected by applicable federal, state or local laws (referred to as "protected characteristics"). Such conduct will not be tolerated by Zenith Home Loans, LLC.

The purpose of this policy is not to regulate our employees' personal morality, but to ensure that no one harasses another individual in the workplace, including while on Company premises, while on Company business (whether or not on Company premises) or while representing the Company. In addition to being a violation of this policy, harassment or retaliation based on any protected characteristic as defined by applicable federal, state, or local laws also is unlawful. For example, sexual harassment and retaliation against an individual because the individual filed a complaint of sexual harassment or because an individual aided, assisted or testified in an investigation or proceeding involving a complaint of sexual harassment as defined by applicable federal, state, or local laws are unlawful.

Harassment Defined

Harassment generally is defined in this policy as unwelcome verbal, visual or physical conduct that denigrates or shows hostility or aversion towards an individual because of any actual or perceived protected characteristic or has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Harassment can be verbal (including slurs, jokes, insults, epithets, gestures or teasing), visual (including offensive posters, symbols, cartoons, drawings, computer displays, text messages, social media posts or e-mails) or physical conduct (including physically threatening another, blocking someone's way, etc.). Such conduct violates this policy, even if it does not rise to the level of a violation of applicable federal, state or local laws. Because it is difficult to define unlawful harassment, employees are expected to behave at all times in a manner consistent with the intended purpose of this policy.

Sexual Harassment Defined

Sexual harassment can include all of the above actions, as well as other unwelcome conduct, such as unwelcome or unsolicited sexual advances, requests for sexual favors, conversations regarding sexual activities and other verbal, visual or physical conduct of a sexual nature when:

- submission to that conduct or those advances or requests is made either explicitly or implicitly a term or condition of an individual's employment; or
- submission to or rejection of the conduct or advances or requests by an individual is used as the basis for employment decisions affecting the individual; or
- the conduct or advances or requests have the purpose or effect of unreasonably interfering

with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Examples of conduct that violate this policy include:

1. unwelcome flirtations, leering, whistling, touching, pinching, assault, blocking normal movement;
2. requests for sexual favors or demands for sexual favors in exchange for favorable treatment;
3. obscene or vulgar gestures, posters or comments;
4. sexual jokes or comments about a person's body, sexual prowess or sexual deficiencies;
5. propositions or suggestive or insulting comments of a sexual nature;
6. derogatory cartoons, posters and drawings;
7. sexually-explicit e-mails, text messages or voicemails;
8. uninvited touching of a sexual nature;
9. unwelcome sexually-related comments;
10. conversation about one's own or someone else's sex life;
11. conduct or comments consistently targeted at only one gender, even if the content is not sexual; and
12. teasing or other conduct directed toward a person because of the person's gender.

Reporting Procedures

If the employee has been subjected to or witnessed conduct which violates this policy, the employee should immediately report the matter to the Manager. If the employee is unable for any reason to contact this person, or if the employee has not received an initial response within five (5) business days after reporting any incident of what the employee perceives to be harassment, the employee should contact the Head of Human Resources. If the person toward whom the complaint is directed is one of the individuals indicated above, the employee should contact any higher-level manager in the reporting hierarchy.

Investigation Procedures

Every report of perceived harassment will be fully investigated, and corrective action will be taken where appropriate. All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed. All employees must cooperate with all investigations conducted pursuant to this policy.

Retaliation Prohibited

In addition, the Company will not allow any form of retaliation against individuals who report unwelcome conduct to management or who cooperate in the investigations of such reports in accordance with this policy. If the employee has been subjected to any such retaliation, the employee should report it in the same manner in which the employee would report a claim of perceived harassment under this policy.

Violation of this policy including any improper retaliatory conduct will result in disciplinary action, up to and including termination.

I have read and I understand Zenith Home Loans, LLC's Non-Harassment Policy.

Employee's Printed Name: _____

Employee's Signature: _____

Position: _____

Date: _____

The signed original copy of this receipt should be given to management - it will be filed in your personnel file.