



# **BALDWIN RISK PARTNERS** **COLLEAGUE HANDBOOK**

[www.baldwinriskpartners.com](http://www.baldwinriskpartners.com)

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# welcome!

**Welcome to BRP!** We are thrilled to have you as part of this exciting organization.

Our Colleague Handbook serves as a great reference point as you begin navigating the world of BRP. I encourage you to become familiar with the practices and information outlined in the following pages.

You also have access to our BRP Azimuth. Our Azimuth serves as our cultural guide - it defines how we do business and the values we incorporate into our everyday lives.

These resources help us stay true to our vision and mission. We invite you to get connected, find opportunities to learn and grow, and most of all - have fun!



Thank you,



Trevor Baldwin, CEO



# TABLE OF CONTENTS

## COLLEAGUE HANDBOOK

### Section 1: About BRP

- BRP Azimuth – Our True North
- Help Us Grow – Colleague Referral Program

### Section 2: What We Expect from You - Promises from Colleagues

- Employment at Will
- Introductory Period
- Attendance
- Hours of Operation and Work Schedules
- Personal Appearance Guidelines (Dress for your Day)
- Remote Work Guidelines (Telecommuting)
- Being On and Collaborative Relationships with Leaders
- Culture of Accountability (Colleague Conduct and Discipline)

### Section 3: What You Can Expect From Us –Promises to Colleagues

- Culture of Inclusion and Belonging
- Equal Employment Opportunity Firm
- Policy Statement on Accommodations
- Open Door Policy
- Formal Complaint Procedure
- Fostering the Right Environment (Policy Statement on Harassment)
- Celebrating You – Employment Anniversary Date
- Help to Grow – Performance Evaluations and Development Plans

### Section 4: Communication

- Methods of General Communication
- BRP Pulse Survey
- Public Relations and Media Inquiries
- Social Media Guidelines
- Solicitation and Distribution of Literature

### Section 5: My Benefits

- Summary Overview of Available Benefits
- BRP Benefits Guide for Health, Dental, Vision and Others
- 401k Plan
- Adoption Assistance
- True North Colleague Fund
- Expense Reimbursement for Smartphone/Data
- Paid Time Off Benefits – Holidays
- Paid Time Off Program for Non-Exempt Colleagues
- Paid Time Off Program for Exempt Colleagues
- Paid Leave Benefits (Parental Leave, Bereavement, Jury Duty, Voting)

# TABLE OF CONTENTS

## COLLEAGUE HANDBOOK

### Section 6: Work Hours, Time Off, and Leaves of Absence

- Recording Work Time (and Overtime)
- Lunch and Breaks
- Pay Periods
- General Information About Leaves of Absence
- Short-term Disability
- Long-term Disability
- FMLA and Military Service and Leave
- Personal Leave of Absence (including domestic, sexual violence)

### Section 7: Ethics, Code of Conduct, and Information Technology Policies

- No-Conflict Policy – Managing Personal Relationships
- Outside Employment (Moonlighting)
- Background Checks and Motor Vehicle Reports
- Confidentiality
- Privacy
- Business Ethics and Business Conflicts of Interest
- Information Technology Policies and Guidelines
  - Computer Hardware
  - Use of Technology and Internet
  - Handling of Sensitive Data
  - Use of Equipment
  - Biometric Security Policy

### Section 8: We Care About Your Safety

- Safety Procedures
- Weapon Free Workplace
- Reporting Safety Issues
- Safety Rules
- Emergency Closings
- Workers' Compensation and Reporting Injuries

### Section 9: General Operating Guidelines and General Employment Information

- Facilities Information
- Licensing Information
- General Firm Practices (expense, mileage, and mobile communications)
- General Employment Information (employment records, personal information, separating employment)

### Section 10: State Addendums

## EMPLOYMENT AT-WILL RELATIONSHIP

All employment at Baldwin Risk Partners (“BRP”) is “at-will”, which means that you or BRP may terminate your employment for any reason, with or without cause or notice, at any time. Nothing in the *My Colleague Handbook* or in any oral or written statement shall limit the right to terminate employment at-will. No one at BRP other than the CEO, with concurring agreement by General Counsel, has the authority to enter into an employment agreement – express or implied – with any colleague providing for employment other than at-will. As with any at-will employment relationship, BRP may change the terms and conditions of employment, including but not limited to position, duties, responsibilities, and benefits at any time within its discretion.

### MY COLLEAGUE HANDBOOK ACKNOWLEDGEMENT FORM

This form must be completed by all new colleagues during the orienteering process and by current colleagues who work in states or local areas requiring acknowledgement anytime the Handbook changes.

MY COLLEAGUE HANDBOOK (“HANDBOOK”) IS AVAILABLE ONLINE THROUGH MY WORKDAY ACCOUNT OR THROUGH BRP SPOT!. IF I PREFER TO RECEIVE A HARD COPY OF THE HANDBOOK, I CAN CONTACT THE HUMAN RESOURCES DEPARTMENT AND THE DESIGNATED HR REPRESENTATIVE FOR MY AREA WILL PROVIDE ME WITH A COPY. THE HANDBOOK IS PROVIDED FOR INFORMATION AND REFERENCE AND I HAVE BEEN ADVISED TO READ IT CAREFULLY AND COMPLETELY. BY COMPLETING THIS FORM, I ACKNOWLEDGE THAT:

- I HAVE BEEN INSTRUCTED HOW TO ACCESS THE HANDBOOK ONLINE AND INFORMATION ON HOW TO REQUEST A COPY OF THE HANDBOOK IF I PREFER A HARD COPY.
- I WILL REVIEW THE HANDBOOK SO I AM FAMILIAR WITH BRP’S POLICIES, PROCEDURES, AND PRACTICES AS BRP EXPECTS ME TO KNOW THEM AND FOLLOW THEM. IF I HAVE ANY QUESTIONS REGARDING INFORMATION IN THE HANDBOOK, IT IS MY RESPONSIBILITY TO ASK HUMAN RESOURCES, MY DIRECT LEADER, OR THE PRESIDENT OF MY LINE OF BUSINESS ABOUT THEM.
- THE HANDBOOK SUMMARIZES SOME POLICIES, PRACTICES, AND BENEFITS OF BRP, AND SOME THINGS BRP EXPECTS FROM ME. IT’S NOT FEASIBLE TO PROVIDE EXPECTATIONS REGARDING EVERY POLICY, PROCEDURE, AND PRACTICE IN THE HANDBOOK AND THE INFORMATION IT CONTAINS IS NOT INTENDED TO BE ALL INCLUSIVE.
- THE HANDBOOK IS NOT A CONTRACT OF EMPLOYMENT AND DOES NOT REPRESENT A CONTRACTUAL COMMITMENT BY THE FIRM ABOUT TERMS OF EMPLOYMENT OR OTHER MATTERS. I FURTHER UNDERSTAND THAT MY EMPLOYMENT IS CONSIDERED “EMPLOYMENT AT-WILL” UNLESS I HAVE OTHERWISE ENTERED INTO A CONTRACTUAL AGREEMENT WITH THE PROPERLY DESIGNATED FIRM OFFICIAL WITH ACTUAL AUTHORITY TO ENTER INTO SUCH AN AGREEMENT AND THAT IT MUST BE IN WRITING, DIRECTED TO ME PERSONALLY AND SIGNED BY HIM/HER.
- THE HANDBOOK DOES NOT CHANGE MY AT-WILL EMPLOYMENT STATUS AND IS NOT A GUARANTEE OF ANY SPECIFIC POLICIES, PROCEDURES, STANDARDS, RULES, OR LENGTH OF EMPLOYMENT. EMPLOYMENT AT-WILL MEANS EITHER I OR BRP MAY TERMINATE MY EMPLOYMENT, AT ANY TIME, FOR ANY REASON, WITH OR WITHOUT CAUSE AND WITH OR WITHOUT PRIOR NOTICE. IT ALSO MEANS THAT BRP MAY TERMINATE MY EMPLOYMENT FOR A GOOD REASON, A BAD REASON, A MISTAKEN REASON, OR NO REASON AT ALL, SO LONG AS IT IS A LEGAL REASON.
- BRP MAY ACT ACCORDING TO THE BEST BUSINESS JUDGMENT OF ITS EXECUTIVE LEADERSHIP TEAM AND MAY MODIFY, AMEND, INTERPRET, ELIMINATE, OR DEVIATE FROM ANY POLICIES, PROCEDURES, AND PRACTICES WITHOUT PRIOR NOTICE, CONSIDERATION, OR APPROVAL OF COLLEAGUES.
- THE MOST RECENT VERSION OF THE HANDBOOK CONTROLS MY EMPLOYMENT AT THE TIME, AND SUPERSEDES ANY PRIOR POLICY OR PRACTICE ON THE SAME ISSUES CONTAINED IN ANY PREVIOUSLY PUBLISHED HANDBOOK VERSION OR OTHER WRITTEN DOCUMENT OR PRACTICE. I’M RESPONSIBLE FOR KEEPING UP WITH CHANGES AS THEY ARE ANNOUNCED.
- TO THE EXTENT THAT I PERFORM WORK IN A STATE WHICH HAS A STATE-SPECIFIC ADDENDUM TO THE HANDBOOK, THE POLICIES IN THE STATE-SPECIFIC HANDBOOK SUPERSEDE AND/OR SUPPLEMENT THE SAME POLICY IN THIS GENERAL HANDBOOK.

Colleague Name: \_\_\_\_\_ Colleague Signature: \_\_\_\_\_  
Colleague Personnel Number: \_\_\_\_\_ Date: \_\_\_\_\_

# **YOU ARE HERE**

## **COLLEAGUE HANDBOOK**

### **SECTION 1: ABOUT BRP**

### **SECTION 2: WHAT WE EXPECT FROM YOU (PROMISES FROM COLLEAGUES)**

### **SECTION 3: WHAT YOU CAN EXPECT FROM US (PROMISES TO COLLEAGUES)**

### **SECTION 4: COMMUNICATION**

### **SECTION 5: MY BENEFITS**

### **SECTION 6: WORK HOURS, TIME OFF, AND LEAVES OF ABSENCE**

### **SECTION 7: ETHICS AND CODE OF CONDUCT**

### **SECTION 8: WE CARE ABOUT YOUR SAFETY**

### **SECTION 9: GENERAL OPERATING GUIDELINES**

### **SECTION 10: STATE ADDENDUMS**

# Section 1: The BRP Azimuth – Our True North

## OUR PURPOSE

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*Our purpose is to deliver indispensable, tailored insurance and risk management insights and solutions to ensure our clients have the peace of mind to pursue their dreams, purpose, and passions.*

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## OUR VISION

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*Our vision is to be regarded as the preeminent insurance advisory firm fueled by relationships, powered by people, and exemplified by client adoption and loyalty, colleague development and engagement as well as operational acumen and evolution.*

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## OUR CORE VALUES

### **Discerning**

*Seeking and weighing a broad range of perspectives, assuming positive intent, being open to input and nimble when new information arises, promoting diversity of thought and ideas within our culture. Sharing information in a manner that is constructive to the intended audience with the common goal of continual improvement. Deploying resources and using information in ways that result in thoughtful solutions and the best path to success. The expert crafting of risk management and insurance coverage architecture that is optimally responsive. Fostering a colleague environment based on the values of diversity, mutual respect, understanding, and cooperation.*

### **Grit**

*Embracing opportunities, overcoming obstacles and getting up and back in the game whenever we are knocked down in order to achieve our objectives. Stepping up to face our challenges and inevitable setbacks with determination; driving to win, being resilient and seeing change as an opportunity to be better.*

### **Genuine**

*Making it easy for others to know and trust us by being approachable, forthright, responsive, calm and transparent. Embracing diversity because it enhances our culture and drives our business success. Doing what we said we would do, even when it is difficult. Being worthy of trust by always doing the right thing in an open and authentic way.*

### **Engaging**

*Showing respect for the dignity of others and helping and caring for them in tangible ways by being warm and welcoming; soliciting the strong diversity of thought among our colleagues as we recognize we are uniquely dependent on the skill and dedication of our colleagues who provide us with our competitive advantage. Recognizing the creativity and beauty of a passion pursued and work well done. Having a sense of humor and energy of spirit that is infectious.*

### **Purpose**

*Acting and thinking beyond ourselves and our self-interest; recognizing how our colleagues differentiate us in the marketplace and nurturing a culture of inclusion and belonging that fosters each colleague being able to be the best version of themselves. Having an abiding appreciation for all that we have and our responsibility to give back and make things better. Celebrating our good fortune and sharing in ways that make our community better.*

### **Dreaming**

*Turning our imagination free, thinking big, looking for a better way and seeing what is possible, but not yet done. Using today's excellence as the springboard to tomorrow's success.*

**We are thrilled you have joined our merry band of passionate insurance professionals and that you are prepared to help us fulfill our purpose and achieve our vision!**

Again, welcome! We look forward to sharing the amazing world of BRP with you and wonderful things we will accomplish together!

## NOW THAT YOU'RE HERE, HELP US GROW BETTER TOGETHER – REFER A FRIEND!

### COLLEAGUE REFERRAL BONUS PROGRAM

We believe you are our best source for identifying other qualified professionals. To show our appreciation, BRP will pay you a referral bonus! Once your referral completes 180 days of employment, your referral bonus will be added to your next paycheck. See below for guidelines and eligibility.

To record your referral, please login into your Workday account. Navigate to the Career Application and click on “Refer a Candidate” under Actions. You will have to provide their full name, resume, email address, the job or job area you are referring them for, your relationship to the referral, and why you think they are a suitable candidate for the position.

#### GUIDELINES & ELIGIBILITY:

- You are eligible for a referral award only when you refer external candidates. A referral is when you bring the candidate’s name and resume to us versus when we have the candidate’s resume and request an endorsement or reference from an internal colleague.
- Colleagues and Team leads involved in the hiring decision for a particular position are not eligible for referral awards for that position.
- Managers and Directors are not eligible for the bonus if the referral is hired for a position within their reporting structure (direct or indirectly).
- Founding Partners, Partners, Managing Partners, Managing Advisors, Managing Directors, Chiefs, Presidents, and Human Resources are not eligible to receive referral awards.
- Only one referral award can be given per candidate—first in gets the referral.
- Both referring and referred colleagues must be actively employed with BRP when the bonus is awarded in the referring colleague’s paycheck.
- Although we do not pay for Intern referrals, we will pay if they are hired full time and complete 180 days of employment.
- If referring to a BRP entity, you will be paid within their bonus structure.
- If you are eligible for a referral bonus in addition to your regular wages, over-time and/or commissions, you must be employed by us on the day payment is made to receive this variable compensation.
  
- You must be a full or part time benefits eligible colleague (Full-Time Regular Colleague or Part-Time Regular Colleague >30) to qualify to receive a referral bonus

DIVISION	REFERRAL BONUS
Middle Market	\$2,500 – Analyst, Operations Team, or Associate Advisor \$5,000 - Advisor, Leadership, Benefits Consultant, Relationship or Account Manager
Guided Insurance	\$500 - Client Relations Analyst (PL or CL) or Operations Team \$1,000 - Advisor, Leadership, or Account Manager referrals
Guided Medicare	\$250 (non-management colleagues)
Connected Risk	\$500 - Client Relations Analyst (PL or CL) or Operations Team \$1,000 - Advisor, Leadership, or Account Manager referrals
MSI & Specialty	\$500 for every referral

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**SECTION 1: ABOUT BRP**

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**SECTION 3: WHAT YOU CAN EXPECT FROM US (PROMISES TO COLLEAGUES)**

**SECTION 4: COMMUNICATION**

**SECTION 5: MY BENEFITS**

**SECTION 6: WORK HOURS, TIME OFF, AND LEAVES OF ABSENCE**

**SECTION 7: ETHICS AND CODE OF CONDUCT**

**SECTION 8: WE CARE ABOUT YOUR SAFETY**

**SECTION 9: GENERAL OPERATING GUIDELINES**

**SECTION 10: STATE ADDENDUMS**

## Section 2: What we expect from you

### Promises from our colleagues

## UNQUESTIONABLE INTEGRITY

### EMPLOYMENT AT WILL

Your employment is an at-will employment, so you or BRP may terminate your employment for any reason, with or without cause or notice, at any time. Nothing in this Handbook or in any oral or written statement shall limit the right to terminate employment at will. No one in the firm has any authority to enter into an employment agreement—express or implied—with any colleague providing for employment other than at-will.

Except for employment at will, terms and conditions of employment with the firm, including but not limited to position, duties, responsibilities, and benefits at any time within its discretion may be modified at the sole discretion of the firm with or without cause or notice. No implied contract about any employment-related decision or term or condition of employment can be established by any other statement, conduct, policy, or practice.

This policy applies to all colleagues unless state law requires otherwise.

### INTRODUCTORY PERIOD

The first 90 days of employment are considered an introductory period for most organic new hires, during which you should become adjusted to your work and to fellow colleagues. An assessment will be made of your alignment with the Azimuth, performance, and overall suitability for the position. Your employment may be terminated without notice during the introductory period.

This policy applies to all colleagues unless state law requires otherwise.

## CULTURE OF ACCOUNTABILITY AND RESPECT THROUGH COMMUNICATION

### ATTENDANCE

Regular and punctual attendance is an essential responsibility each of us as colleagues owe to each other and to the firm. If you must be away from the office or if it is necessary for you to leave work during working hours, you must notify your direct leader, or Managing Director or team lead as soon as possible under the circumstances.

To ensure we pay non-exempt colleagues for all time worked, it's very important that non-exempt colleagues accurately enter all time worked in the designated time reporting system. Misrepresenting hours worked, or failure to report all time worked, may cause disciplinary action, including termination. Colleagues must enter their own time and may not enter time for each other. If, for any reason, you failed to enter your time in the reporting system, notify your direct leader, or Managing Director or team lead immediately.

And in some of our operating areas, colleagues must utilize their PTO time before any request for unpaid time off. A colleague who wants or needs to take time away from work and wants that time to be unpaid time off is to complete a request for FMLA or Personal Leave of Absence. Without these requests, any unpaid time off is considered excessive absenteeism.

Job Abandonment is defined as 3 days no call/no show and may cause termination.

## HOURS OF OPERATION & WORK SCHEDULES

Hours of operation and daily work schedules will vary depending on each office location. Work schedules may be adjusted as deemed necessary by leadership, considering the firm's business needs and colleague preferences.

For questions or concerns regarding the hours of operation at your office or your work schedule, please contact your direct leader, Managing Director or Regional President, or other team lead.

## PERSONAL APPEARANCE GUIDELINES – DRESS FOR YOUR DAY

Generally, we're a business casual firm when working in an office location or working remotely, and a professional dress firm when it comes to interacting with clients and our insurance carrier partners. We expect colleagues to dress professional for any interactions with clients, regardless of the format of the meeting (e.g., for example, even if a meeting is video based rather than in-person). Similarly, when working remotely, even if you have no client meetings for the day, please appear on video meetings dressed as you would if at the office (i.e., business casual on non-client interaction days and professional dress on days when you have client meetings).

Various business areas within BRP may implement region-specific appearance guidelines so please check with your leader to determine if there are any unique guidelines for your area, but in general BRP provides the following high-level guidance for helping colleagues understand what it is generally meant by **business casual** and **professional** dress.

### ***General Guidelines for Business Casual Appearance***

In general, this is a Yes:

- Khakis, chinos, corduroys
- Dark jeans, tailored jeans (no rips, tears, or frayed edges)
- Tailored capris or cropped pants
- Casual dresses with shoulder coverage or reasonable width shoulder strap if sleeveless dress (i.e., no spaghetti strap or very thin strap)
- Polo or golf shirts, casual collar shirts
- BRP-logo or other entity-logo shirts or pullovers
- Docksidlers, Sperry-type shoes, polished 'dress-style' sandals, clean tennis shoes
- Overall, an appearance that displays a relaxed but polished vibe

In general, this is a No:

- No sweatpants, leggings, jeggings or athleisure wear
- No shorts, city shorts, or pedal pushers
- No low-cut, revealing, or overly tight clothing
- No tank tops, low back shirts, or see-through clothing
- No short skirts
- No graphic or screen-printed t-shirts

### ***General Guidelines for Professional Appearance***

In general, this is a Yes:

- Dress shirts or tailored shirts

- Jackets and ties
- Dress shoes

## REMOTE WORK (TELECOMMUTING)

BRP recognizes the positive impact flexibility can provide and offers remote work options to eligible colleagues to maximize their productivity while ensuring we maintain our high level of standards in client service. Remote work allows eligible colleagues to work at home, on the road, or in a satellite location for some of their workweek. Eligible colleagues agree to follow our remote work requirements, and all other firm policies and procedures.

### ELIGIBILITY:

BRP considers remote work to be a viable, flexible work option when both the colleague and the colleague's position are suited to such an arrangement. Remote work options are appropriate for some jobs within BRP but not all and even for jobs that are viable to support remote work it is not an entitlement and in no way changes the terms and conditions of employment with BRP. Various business areas within BRP may implement additional eligibility requirements beyond the list below, but generally speaking, listed below are the eligibility requirements for remote work at BRP.

- **Job Responsibilities.** As noted, certain roles with BRP are more viable for remote work options than others, and eligibility for remote work options is generally discussed during the hiring process. If you are not sure if your role is eligible for remote work, please ask your leader or team lead.
- **Colleague Suitability.** In addition to your specific job within BRP needing to be eligible for remote work, your leader will assess the work habits of colleagues requesting to work remotely to confirm any colleague working remotely exercises the independence and diligence necessary to work effectively and productively in a remote environment.
- **Tenure.** Generally, colleagues should be employed with BRP for a minimum of 6 months before leaders approve remote work options because there is often training or other means of getting new colleagues "up to speed" in a new role or new business area that benefit from in-person or on-site work.
- **Satisfactory Performance.** All colleagues who work remotely, either periodically or full-time, must have satisfactory job performance (or be progressing appropriately through training) in order to be eligible for remote work options.

### GENERAL EXPECTATIONS FOR WORKING REMOTELY:

- Colleagues are expected to be fully available and communicative during scheduled work hours and should generally maintain the same work hours as when working on-site or in the office.
- Serving clients always comes first and it is never acceptable to reschedule, move, or decline any client-based meeting because it might conflict with a planned remote workday.
- All colleagues who are eligible for remote work, including colleagues who are full-time remote colleagues, are expected to attend in-person or on-site meetings as is necessary for their job (for example, attend training sessions, periodic department or team meetings, update meetings with leader or peers, special project meetings, client meetings, etc.). It is not acceptable to use "it's my remote workday" as a reason to not attend an event in person that would normally prompt in-person attendance.
- Colleagues should coordinate with their direct leader or team lead to determine which types of meetings or events will be prioritized as in-person events versus which types of meetings and events are okay for the colleague to participate in remotely.
- Business areas (and sometimes specific teams within business areas) set the guidelines for how many days a week colleagues may work remotely, and/or set parameters for certain days that are best or preferred for remote work (or prohibited for remote work).

- Colleagues are expected to follow BRP appearance standards while working remotely (i.e., when appearing on video during meetings colleagues should be dressed in either business casual attire or professional attire depending on the nature of the meeting).
- Colleagues are expected to have a dedicated and business-like workspace within their remote work environment, which should be in a quiet and distraction-free working space to the extent possible.
  - When working remotely, colleagues are expected to be free managing other personal responsibilities such as childcare or dependent care.
  - When working remotely, colleagues are expected to maintain the confidentiality of client information the same as they would when working in the office (for example, securing both electronic and paper forms of information, not discussing confidential matters in front of others, locking computer when not in use).
- Colleagues are expected to maintain their workspace in a safe manner, free from safety hazards.
- All BRP work guidelines and other policies continue to apply to remote work locations.

### VIRTUAL MEETINGS GUIDELINES:

- While distractions are sometimes unavoidable, colleagues working remotely are expected to keep them to a minimum (for example, no music or television in the background during meetings; work in a location that allows for privacy and distance from other family members, etc.).
- Generally speaking, we expect colleagues to appear on video during meetings. Appearing via video is preferable to attending via audio only (appearing on video is always a requirement for any client facing meetings).
- To help minimize background noise, it is generally a best practice to keep yourself muted during video or audio conferencing unless you are speaking.
- Avoid eating a meal during a virtual meeting unless invited to do so by the meeting host.
- As a good business etiquette practice, avoid multi-tasking during virtual meetings and give your full attention to the meeting as if you were face to face.

For more information on remote work requirements and guidelines, including whether your role is eligible for remote work, please contact your direct leader or team lead.

## BEING ON

You have an important role at our firm, and we expect that you agree to perform your assigned responsibilities to the very best of your ability. Regardless of the years of experience you had when you joined us, your first responsibility is to master your own job responsibilities and follow through with them promptly, correctly, and consistently in alignment with our Azimuth. BRP has heavily invested in opportunities for personal and professional development, and you are encouraged to take full advantage of them.

As a professional, you will be held responsible for your own actions and for maintaining standards of performance and behavior that reflect BRP' status in the industry. While ramping up in your role, make sure you understand the standard of performance and behavior expected, and conduct yourself accordingly.

We are continuously improving the quality of the service we provide and our work environment, so we encourage you to voice your opinions and contribute openly.

## COLLABORATIVE RELATIONSHIPS WITH LEADERSHIP

We believe in direct access to leadership and are dedicated to making BRP a firm where you can approach any member of the leadership team, from your direct leader to the partners, to discuss any thoughts, ideas, or concerns.

Your leadership will be an incredible source of support and guidance, and besides your leadership team we have a robust and experienced team of HR leaders available to guide you and advise on matters should you encounter any sensitive situations. We call our HR team the “Thrive Hive” because their primary focus is supporting BRP culture and fostering work environments that allow every BRP colleague to be their very best and thrive. Your engagement in establishing relationships with your leaders and team is a key part of your path to personal success and a primary source for BRP being a great place to work, grow, and be rewarded for contributions.

## WHY IS IT IMPORTANT TO US?

How well you interact with fellow colleagues and those whom we serve, and how well you engage in feedback and activities to continuously improve, will contribute greatly to your success. We will provide you with the support resources to succeed and have established a culture that allows you to positively contribute to making each day satisfying and rewarding.

We look forward to seeing what you can do and sharing the amazing world of BRP with you!

## A CULTURE OF ACCOUNTABILITY AND HELP TO GROW (COLLEAGUE CONDUCT AND DISCIPLINE)

To provide the best work environment, colleagues are expected to conduct themselves professionally. If a colleague demonstrates inappropriate behavior in the workplace, disciplinary action may be taken.

Disciplinary action is often progressive in nature and in many cases may call for any of four steps—coaching, counseling with verbal warning, written warning with performance improvement plan and/or punitive job action, or termination of employment—depending on the severity of the problem and the number of occurrences. Sometimes, one or more steps are bypassed.

BRP does not tolerate conduct that is immoral, illegal, or dishonest. Although it is impossible for the firm to anticipate every form of misconduct that might call for discipline or immediate termination, the list below provides examples of conduct not tolerated by BRP.

- Falsification of any records and/or systems, or other information furnished to BRP
- Insubordination or refusal or unwillingness to perform essential functions of your position or refusal or reluctance to comply with the direction or instructions of a person in charge
- Negligence in the performance of your duties
- Theft, destruction, or misuse of property belonging to BRP or another colleague
- Intentional, careless, or recurring improprieties in handling financial-related information or related to regulatory insurance requirements
- Intentional, careless, or recurring violations of BRP’s policies and practices related to acceptable use of I/T resources
- Violation of established safety practices or any conduct which is unsafe under the circumstances; failure to report work-related injuries or illnesses within a reasonable timeframe
- Violation of BRP’s EEO policy; intimidation, interference or harassment of a colleague or any other individual, including but not limited to sexual harassment
- Improper or inappropriate treatment of colleagues, clients, or other individuals
- Possession, sale of, consumption of, or being under the influence of illegal substances while working or while on firm business

- Disorderly or immoral conduct that may reflect on the reputation of BRP, on or off the job
- Excessive absenteeism

Your direct leader, team lead, or designated HR Partner can answer questions you have on when you would be subject to disciplinary action.

# **YOU ARE HERE**

## **COLLEAGUE HANDBOOK**

**SECTION 1: ABOUT BRP**

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**SECTION 3: WHAT YOU CAN EXPECT FROM US (PROMISES TO COLLEAGUES)**

**SECTION 4: COMMUNICATION**

**SECTION 5: MY BENEFITS**

**SECTION 6: WORK HOURS, TIME OFF, AND LEAVES OF ABSENCE**

**SECTION 7: ETHICS AND CODE OF CONDUCT**

**SECTION 8: WE CARE ABOUT YOUR SAFETY**

**SECTION 9: GENERAL OPERATING GUIDELINES**

**SECTION 10: STATE ADDENDUMS**

## Section 3: What you can expect from us

### Promises to colleagues

*We are passionate about supporting, challenging, and celebrating you.*

#### CULTURE OF INCLUSION AND BELONGING

BRP strives to create a Culture of Inclusion and Belonging. We believe in an environment based on the values of diversity, mutual respect, understanding and cooperation. Embracing diversity only enhances our culture and drives our business success. We are a firm uniquely dependent on the skill and dedication of our colleagues who differentiate us in the marketplace and provide us with a competitive advantage. BRP believes that advancement and rewards should depend solely on ability, performance, and contribution to our firm goals without regard to race, sex, color, religion, age, national origin, pregnancy, sexual orientation, veteran status, gender identity and expression, genetic information or disability, and other perceived differences that do not relate to ability, performance, and contribution at work. Ensuring that all aspects of our diversity are valued in our culture is the responsibility of every BRP colleague and providing such a culture is BRP's commitment.

#### EQUAL EMPLOYMENT OPPORTUNITY FIRM

BRP is an equal employment opportunity firm and strives to comply with all laws prohibiting discrimination based on race, color, religion, age, sex (including sexual orientation and gender identity), national origin or ancestry, disability, military status, marital status, and any other category protected by federal, state, or local laws. All such discrimination is unlawful, and all persons involved in the operations of the firm are prohibited from engaging in this conduct.

Report every instance of unlawful discrimination, regardless of whether you or someone else is the subject of the discrimination. Detailed reports—including names, descriptions, and actual events or statements made—will greatly enhance the firm's ability to investigate. Any documents supporting the allegations should also be submitted. Based on your report, the firm will investigate. The firm prohibits any and all retaliation for submitting a report of unlawful discrimination and for cooperating in any investigation. Any team lead or colleague who retaliates against the accuser or those involved in the investigation will be disciplined, up to and including discharge from employment.

If the investigation determines that prohibited discrimination or other conduct which violates the firm policy has occurred, the firm will take corrective action, up to and including termination of employment, against those who engaged in the misconduct. The firm will also evaluate whether other employment practices should be added or modified to deter and prevent that conduct in the future. You will be informed of whatever action(s) the firm takes to resolve the situation.

## POLICY STATEMENT ON ACCOMMODATIONS

At BRP, we value the unique perspectives and abilities of all of our colleagues. We understand that some of our colleagues had disabilities or experience illnesses or injuries of a prolonged or permanent nature that make it difficult for them to perform certain aspects of their job without assistance. Our goal is to assist and support colleagues in these circumstances by providing a reasonable accommodation whenever possible. To determine what reasonable accommodation best satisfies the colleague's request and BRP's business needs, an interactive discussion should occur. With this in mind, when a need is brought to our attention, we will reasonably accommodate known physical and mental limitations of an otherwise qualified individual with a disability, unless an undue hardship or a direct threat to the health or safety of the individual or others would result.

For BRP to properly assess requests and address concerns, they must be reported to a colleague properly trained and designated within BRP to handle them, which is a member of the Human Resources Colleague Relations team (i.e., your designated HR Partner, or the HR Manager or HR Director of Colleague Relations for your area).

## OPEN DOOR POLICY

As part of our philosophy about having direct access to leadership, BRP promotes an Open Door Policy as a way to allow for and encourage open, honest, and effective lines of communication among colleagues. It's a natural fact of life that occasionally there will be misunderstandings, concerns, or conflicts among people. If something bothers you, or if you need clarification of a policy or procedure, or just want to address something that's a difficult topic, please know that your immediate leader is there for you and will make him/herself available to you to talk about it. Questions and concerns brought to your leader will be taken seriously and addressed to the appropriate BRP colleague for response.

Experience has shown that many concerns or problems can often be worked out by following these steps:

1. If you have a question or concern, discuss it with your immediate leader.
2. If the question or concern is not resolved or you still have a question, discuss it with a higher leader within your business area (or possibly your Regional President).
3. If the question or concern is still not resolved, you can also discuss it with the designated HR Partner assigned to support your business area.

If you'd like to speak with the HR Partner for your area but you're not sure who it is, please contact the Human Resources department via email at [HR@baldwinriskpartners.com](mailto:HR@baldwinriskpartners.com) and ask for the HR representative contact information for your area.

If you have a concern about a potential violation of the EEO or harassment policy or an accommodation request, you **must** report the concern to a colleague properly trained and designated within BRP to handle such a concern, which is a member of the Human Resources Colleague Relations team (i.e., your designated HR Partner, or the HR Manager or HR Director of Colleague Relations for your area). You can also elect to file a written formal complaint through BRP's Formal Complaint Procedure.

Concerns and questions brought to the attention of BRP leadership and/or the Human Resources team will be taken seriously and addressed timely. Our Open Door policy has been established to support you and work for you – please use it whenever you feel it's necessary.

## FORMAL COMPLAINT PROCEDURE

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The Formal Complaint Procedure (FCP) is a formal method of having a colleague's concerns regarding their employment addressed and documented (for example, concerns about workplace safety, discrimination, harassment, or other

potential violations of policy or the law). To use the FCP, you must send a written complaint to the Human Resources Department. An investigation will be conducted quickly and confidentially. The complaint will not be held against you and BRP will tolerate no retaliation against you for making a complaint. You'll be notified of the results in writing once the investigation is complete. Complaint forms for lodging a complaint through the FCP are available by contacting your designed HR Partner or emailing [HR@baldwinriskpartners.com](mailto:HR@baldwinriskpartners.com) and requesting one be sent to you.

## FOSTERING THE RIGHT ENVIRONMENT – POLICY STATEMENT ON HARASSMENT

Under applicable law, BRP prohibits sexual harassment and harassment because of race, color, gender, national origin, ancestry, religion, creed, physical or mental disability, marital status, age, or any other basis protected by federal, state, or local law. All such harassment is unlawful and will not be tolerated.

### SEXUAL HARASSMENT DEFINED

Sexual Harassment is defined as any unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (2) submission to or rejection of such conduct by an individual is the basis for employment decisions affecting such individual; or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, offensive, or hostile working environment.

Listed below is a partial list of examples.

- Unwanted sexual advances
- Offering employment benefits in exchange for sexual favors
- Making or threatening reprisals after a negative response to sexual advances
- Visual conduct such as leering, making sexual gestures, or displaying sexually suggestive objects, pictures, cartoons, or posters
- Verbal conduct such as making or using derogatory comments, epithets, slurs, sexually explicit jokes, or perverse comments about any colleague's body or dress
- Verbal sexual advances or propositions
- Verbal abuse of a sexual nature, graphic verbal commentary about an individual's body, sexually degrading words to describe an individual, or suggestive or obscene letters, notes, or invitations
- Physical conduct such as unwanted touching, assault, or purposely impeding or blocking movements
- Retaliation for reporting harassment or threatening to report harassment

It is unlawful for males to sexually harass females or other males, and for females to sexually harass males or other females. Sexual harassment on the job is unlawful whether it involves colleague harassment, harassment by leadership, or harassment by persons doing business with or for BRP.

### OTHER TYPES OF HARASSMENT

Prohibited harassment based on race, color, national origin, ancestry, religion, physical or mental disability, marital status, age, gender, or any other protected basis, includes behavior similar to sexual harassment, such as

- verbal conduct such as threats, epithets, derogatory comments, or slurs
- visual conduct such as derogatory posters, photographs, cartoons, drawings, or gestures
- physical conduct such as assault, unwanted touching, or blocking normal movement, and/or
- retaliation for reporting harassment or threatening to report harassment.

## REGISTERING A COMPLAINT

BRP has multiple avenues for colleagues to file a complaint about harassment. Our complaint procedures provide an immediate, thorough, and objective investigation of any claim of unlawful or prohibited harassment, appropriate disciplinary action against one found to have engaged in prohibited harassment, and appropriate remedies for any victim of harassment. A claim of harassment may exist even if the colleague has not lost their job or some economic benefit.

If you believe you have been harassed on the job, or if you are aware of the harassment of others, you should immediately report such concerns to the Human Resources department in one of the following ways:

1. Submit a verbal or written complaint to your designated HR Partner (or in writing to the Human Resources department via [HR@baldwinriskpartners.com](mailto:HR@baldwinriskpartners.com)) as soon as possible.
2. Submit a formal complaint through BRP's Formal Complaint Procedure (FCP).

Applicable law also prohibits retaliation against any colleague by another colleague or by BRP for registering a complaint or for filing, testifying, assisting, or participating in any investigation, proceeding, or hearing conducted by a governmental enforcement agency. BRP will not knowingly permit any retaliation against any colleague who complains of prohibited harassment or who participates in an investigation.

All incidents of prohibited harassment reported will be investigated. BRP will immediately undertake or direct an effective, thorough, and objective investigation of the harassment allegations. The investigation will be completed and a determination regarding the reported harassment will be made and communicated to the colleague who complained and to the accused harasser(s).

If BRP determines that prohibited harassment has occurred, BRP will take effective remedial action commensurate with the circumstances. Appropriate action will also be taken to deter any future harassment. If a complaint of prohibited harassment is substantiated, appropriate disciplinary action, up to and including termination, may be taken.

## CELEBRATING YOU - EMPLOYMENT ANNIVERSARY DATE

We love celebrating our BRP colleagues, and we especially love to celebrate your years of service with us and have a special anniversary gift program to recognize your contributions to BRP and thank you for choosing to be part of the BRP family. The gift portion of our anniversary program uses an innovative platform called Snappy Gifts. Snappy allows you to choose a gift from a curated collection of trending gifts that you are sure to love! You will receive a Snappy gift on your work anniversary at **1, 3, 5** years of service—and **every five years** after that (10, 15, 20, 25, etc.).

On your service anniversary date, you will receive an email from Snappy where you can redeem a gift. Your anniversary date depends on how you joined BRP:

- **Organic New Hires** - The first day you report to work at BRP becomes your “official” anniversary date.
- **Partnership New Hires** - Your original hire date with the partnered firm (your seniority date) will be recognized as your anniversary date.

## HELP TO GROW - PERFORMANCE EVALUATIONS AND DEVELOPMENT PLANS

Your development starts the day you join the firm and will continue throughout your journey with the BRP family. Training and growing ourselves personally and professionally never stops and that it plays an important part in your growth and development at BRP. You'll receive on-the-job training from your leader, designated coach or trainer, and possibly from fellow colleagues. Take advantage of these opportunities and make the most of your potential to grow.

## 90-DAY REVIEWS

In most business areas, all new colleagues will receive a formal 90-day performance review from their direct leader or other designated Team lead, typically right after their 90-day introductory period has concluded. This is the perfect time for both you and your leader to check-in on how you're developing in the role, discuss what additional support you might need, and also outline ongoing performance objectives for the remainder of the performance review period until you transition over to the annual performance review process.

## ANNUAL PERFORMANCE REVIEWS

You and your direct leader (or Team lead) will discuss job performance and goals on an informal, continual, basis. You will also receive an annual performance evaluation during the first quarter of each calendar year. Performance evaluations are conducted to provide both colleagues and leaders with the opportunity to discuss job responsibilities, identify and correct weaknesses, encourage, and recognize strengths, and discuss positive, purposeful approaches for improving your performance for meeting the job requirements and firm needs. This process may include:

- Self-Evaluation
- Peer Feedback
- Evaluation by Leader
- Help to Grow Development Planning (individual development plans)

# **YOU ARE HERE**

## **COLLEAGUE HANDBOOK**

**SECTION 1: ABOUT BRP**

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**SECTION 4: COMMUNICATION**

**SECTION 5: MY BENEFITS**

**SECTION 6: WORK HOURS, TIME OFF, AND LEAVES OF ABSENCE**

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**SECTION 8: WE CARE ABOUT YOUR SAFETY**

**SECTION 9: GENERAL OPERATING GUIDELINES**

**SECTION 10: STATE ADDENDUMS**

## Section 4: Communication

### *Respect through communication and staying connected*

#### COMMUNICATION

One of BRP’s promises to our colleagues is Respect Through Communication. We recognize the unique perspectives of our colleagues and strive to deliver effective communication to our colleagues in a variety of ways.

Method	Descriptions
<b>Town Calls</b>	At the BRP-level and amongst our partner firms, we host quarterly all-in calls where we share information on important firm initiatives and updates, quarterly earnings information, and take the opportunity to celebrate successes. The format of these calls differs across businesses, but all serve one purpose – to connect our colleagues to the overall vision and goals of the organization.
<b>Touch Base Calls</b>	Our Touch Base Calls are quick and easy! We tune in monthly to hear important updates from our CEO and engage in Q&A. We use this forum to create and encourage open communication.
<b>Email Communications</b>	<p>We send a variety of email communications to our colleagues. But don’t worry – we don’t clog your inbox, our communications are tailored and sent directly to those that are intended to receive it. Be on the lookout for announcements from the following email addresses.</p> <ul style="list-style-type: none"> <li>• <a href="mailto:internalcomm@baldwinriskpartners.com">internalcomm@baldwinriskpartners.com</a> – Announcements, internal events and webinars, opportunities to participate in activities.</li> <li>• <a href="mailto:leadership@baldwinriskpartners.com">leadership@baldwinriskpartners.com</a> – Announcements and updates directly from our BRP leaders; calendar invitations for BRP-wide calls.</li> <li>• <a href="mailto:HR@baldwinriskpartners.com">HR@baldwinriskpartners.com</a> – Important HR announcements.</li> <li>• <a href="mailto:IT@baldwinriskpartners.com">IT@baldwinriskpartners.com</a> – Important IT announcements.</li> <li>• <a href="mailto:leaderinsights@baldwinriskpartners.com">leaderinsights@baldwinriskpartners.com</a> – Relevant leader training and resources from our Learning &amp; Development team.</li> </ul>
<b>BRP Spot</b>	<p>BRP Spot is our intranet – a home for all things BRP. Spot is used to reinforce email communications, share important announcements, encourage collaboration and interaction, and serve as a melting pot for the many faces of BRP.</p> <p>BRP Spot includes:</p> <ul style="list-style-type: none"> <li>• Regular newsletters/roll-up emails</li> <li>• Customizable notifications</li> <li>• Invitations</li> <li>• Chat and newsfeed opportunities</li> <li>• New hire and promotion announcements</li> </ul>
<b>Alert Media</b>	Alert Media is a text messaging tool used for emergencies across BRP. This tool is used to notify colleagues of potential emergencies in or around offices and send up to date notifications during weather events.
<b>IR Updates</b>	BRP news and Investor Relations updates. You can sign-up for regular alerts and information from BRP Investor Relations.

#### BRP PULSE SURVEY

We are a firm powered by people and are deeply committed to listening to our colleagues because our colleagues continually make us better collectively. We live our core value of being genuine and fostering exceptional relationships by

actively seeking what you think about your job, your team, and your firm! Each year we administer an anonymous survey to all colleagues with over 90 days of service with BRP. This survey allows you to confidentially share what you think about a variety of topics that impact your work environment and our firm. The results of the Pulse survey are shared with each business area and with every colleague and the HR Thrive Hive team for your business area will work with you and the leaders of your area to facilitate an overview of the results and discuss what action plans, if any, might be initiated to make desired improvements.

Seeking colleague feedback through our annual Pulse survey is one of the many tools we use to help us continue to build on our strengths and improve on our weaknesses. We strongly encourage all colleagues to participate in this valuable process when the time comes – we value your voice!

## PUBLIC RELATIONS AND MEDIA INQUIRIES

It's important for BRP to provide timely and consistent messages through media and provide responses in guidance with our obligations as a publicly traded firm and appropriately support our strategic objectives. Therefore, only authorized BRP representatives are designated to speak on the firm's behalf, and those individuals include the Chief Executive Officer, Chief Financial Officer, and Chief Operating Officer. No one other than these individuals should represent the firm's position to the media. If you're approached by a member of the media asking you to comment on BRP's behalf or share information about BRP, inform your leader who will contact the BRP Marketing team for referral and handling.

## SOCIAL MEDIA GUIDELINES

BRP has a growing social media presence, and we believe social media has many positive uses (both for personal and business use), but also has the potential for hidden or unintended pitfalls. Like traditional media inquiries, BRP has authorized leaders whose assigned jobs include responding to comments, questions, or concerns through social media channels (such as Facebook, YouTube, Twitter, Instagram, etc.). If you see something on social media about BRP you feel could have a negative impact or that you think we might not know, please share that information with your leader who will contact either the Human Resources team or the BRP Marketing team for review and potential response.

With your own personal use of social media, we understand that many colleagues use various forms of social media and may want to share their experiences. While we value all opinions and pride ourselves on encouraging all colleagues to share those opinions with us, social media platforms are "public" domains where things are visible to all. It's important to know your comments and opinions about BRP made in public social media domains can be read by clients, our insurance company partners, fellow colleagues, and others. All colleagues are expected to act professionally both on and off the job and to refrain from behavior that could adversely affect BRP's reputation or mission. As a general guideline, if you wouldn't say something at work in front of a client or your fellow colleagues and leadership team, it's best not to say it on social media. We are each accountable for our own behavior, both in the "regular" world as well as in the social media world.

Please keep this advice in mind when using social media:

- **Know your audience.** If commenting about BRP, our clients, or our colleagues, be courteous and avoid derogatory and personal insults. Unlawful conduct (including harassment, discrimination, or threats of violence) can cause disciplinary action, up to and including termination even though the conduct is outside of the workplace or was posted while off the clock.
- **Don't disclose private or confidential information.** Private information includes private health information (PHI) which is protected by HIPAA laws, and personally identifiable data which can cause identity theft or financial loss (for example, social security numbers, driver's license numbers, personal banking information, credit/debit card numbers, passport numbers, and other similar data).

This policy is not intended to restrict or interfere with any colleague's federal or state labor law rights, including all rights under the National Labor Relations Act, or any whistleblower protections under federal or state law.

## SOLICITATION AND DISTRIBUTION OF LITERATURE

Please note these rules regarding solicitation and distribution of written material during working time and entry onto the premises and work areas:

- No colleague shall solicit or promote support for any cause or organization during his or her working time or during the working time of the colleague or colleagues at whom the activity is directed.
- No colleague shall distribute or circulate any written or printed material in work areas at any time, during his or her working time, or during the working time of the colleague or colleagues at whom the activity is directed.
- Only solicitation approved in advance by the Regional President or Chief Operations Officer is authorized and should be left in a common area for colleague consideration.

# **YOU ARE HERE**

## **COLLEAGUE HANDBOOK**

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**SECTION 6: WORK HOURS, TIME OFF, AND LEAVES OF ABSENCE**

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**SECTION 10: STATE ADDENDUMS**

# Section 5: My Benefits

*Powered by people, committed to our colleagues well being*

## BENEFITS

All eligible regular full-time colleagues working at least 25 hours per week will receive a summary of the benefits offered during new hire benefit enrollment. The benefit descriptions, which will be updated as necessary, can be found on the firm intranet. If you need detailed information regarding benefits, please contact the Human Resources Benefits Department or refer to Workday.

BRP is proud to offer a robust and comprehensive package of benefits, including many at no cost to eligible colleagues.

**BRP OFFERS THE FOLLOWING BENEFITS TO ELIGIBLE COLLEAGUES AT NO COST**

Mobile Health & Telemedicine	EAP Services	Wellness Support
Short-term Disability	Paid Parental Leave	Business Travel Coverage
Long-term Disability	Adoption Assistance	Corporate Discounts
Life Insurance & AD&D	Mobile Health (primary physician care)	Paid Holidays
Paid Time Off Program	Paid Bereavement Leave	

**BRP OFFERS THE FOLLOWING BENEFITS TO ELIGIBLE COLLEAGUES WHO PARTICIPATE IN THE COST**

Health Plan	401k Plan	Group Excess Coverage
Dental Plan	Dependent Life and AD&D	Identity Theft Coverage
Vision Plan	Dependent Care FSA	Accident and Critical Illness
Health Savings Account	Flexible Spending Account	Pet Insurance
Commuter Benefits	Long Term Care	Cancer Guardian Coverage

## CHECK OUT THE [BRP BENEFITS GUIDE](#) FOR THE FULL SCOOP

For detailed information about eligibility, enrollment, coverage, and costs on the benefits below, please refer to the **BRP Benefits Guide**, which you can access through your Workday account by going to the Benefits app and accessing the external link called [2022 Benefits Guide](#).

- Health, Dental, and Vision plans
- Cure8 Mobile Health
- Wellview and BRP Vitality Wellness Program (wellness support)
- HealthJoy (virtual healthcare access platform, including telemedicine and EAP services)
- Health Savings Account (HSA) and Flexible Spending Accounts (FSA)
- Life, AD&D, Disability, Cancer Guardian
- Voluntary Benefits (Commuter, Excess Liability, Cybersecurity, Pet)
- 401K
- Adoption Assistance Program
- True North Colleague Fund

## BRP HEALTH, DENTAL, AND VISION PLANS

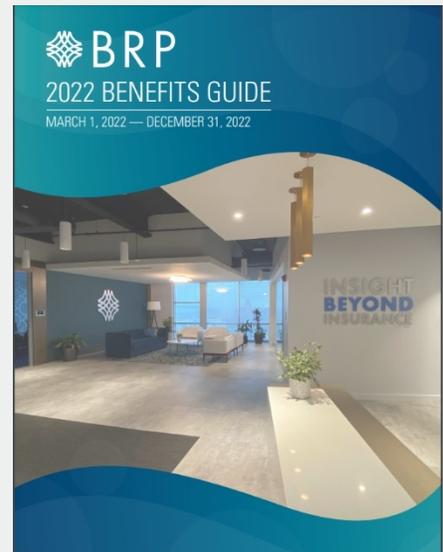
Taking care of ourselves is one of the most important things we can do and BRP offers comprehensive coverage in health, dental, and vision. See the **BRP Benefits Guide** for details.

## 401K PLAN

BRP offers a 401k retirement plan through Fidelity Investments. You have the option of making pre-tax 401k deferrals, post-tax Roth 401k deferrals, or a combination of both. BRP provides a discretionary match to eligible colleagues. Beginning April 1, 2022, if you contribute just 6% of your compensation, you'll receive the maximum BRP match of 4% of your compensation. See the **BRP Benefits Guide** for details on the 401k plan, including details about BRP's match and vesting schedules based on your hire date with BRP.

## ADOPTION ASSISTANCE

BRP supports colleagues in the decision to adopt children. Adopting a child represents a large financial commitment, not only in adoption fees, but also in expenses throughout the child's life. We will reimburse certain expenses up to \$5,000 per adoption incurred in the legal adoption of a child, as long as the adoption meets certain eligibility requirements. This policy will pay out a maximum of \$15,000 per colleague. See the **BRP Benefits Guide** for details.



Please note that BRP has a Section 125 plan which allows colleagues to pay for their portion of the cost of many BRP benefits on a pre-tax basis. The IRS requires that enrollment in these plans remain intact for the duration of the plan year one year unless you have a qualified family status change. See the specific benefits plan documents or contact Human Resources Benefits Department for more details.

## TRUE NORTH COLLEAGUE FUND

To help colleagues experiencing extraordinary hardship, we have set up the BRP True North Colleague Fund, to which you can contribute by making a donation. BRP initiated the fund with a pledge of \$250,000 and is honored to provide a dollar-for-dollar match up to another \$250,000 and will be paying the administration fee on credit card transactions.

Through our funds, grants will be made to colleagues affected by catastrophic events such as COVID-19, loss of employment in the family, illness, natural catastrophe, etc. Grants will be awarded as soon as possible to those individuals who meet the prescribed eligibility criteria.

The fund is reviewed, verified, and operated by America's Charities, a 501(c)(3) nonprofit with 40 years of proven charitable funds management expertise. Partnering with America's Charities ensures your donations to the fund are tax-deductible, and all grants made from the fund are tax-free – allowing us to provide maximum support to our colleagues quickly in their time of need. Visit [brptruenorthcolleaguefund.americascharities.stratuslive.com](http://brptruenorthcolleaguefund.americascharities.stratuslive.com) to either make a donation or request a form if you need help. For questions about the fund or to check on the status of an application, contact America's Charities at [BRPTrueNorth@charities.org](mailto:BRPTrueNorth@charities.org)

## EXPENSE REIMBURSEMENT FOR SMART PHONE/DATA CHARGES

The firm reimburses colleagues in eligible positions for mobile device and data usage at \$50 per month. Your Leader will let you know if your position is eligible to be reimbursed for business related cell phone calls, emails, and text messages. The firm will not reimburse colleagues for other miscellaneous features. If you are eligible for reimbursement, you will automatically be reimbursed in your paycheck on a per-check basis once the firm email feature is added to your phone. To receive the reimbursement, you must sign the auto-reimbursement agreement provided to you.

## PAID TIME OFF BENEFITS

### HOLIDAYS

The firm pays regular full-time and eligible part-time colleagues who work over 25 hours a week for 12 holidays, which include 11 nationally recognized holidays plus 1 floating/personal holiday on the approved date of the colleague's choice.

New Year's Day	January 1
Martin Luther King, Jr. Day	Third Monday in January
President's Day	Third Monday in February
Memorial Day	Last Monday in May
Juneteenth	June 19
Independence Day	July 4
Labor Day	First Monday in September
Thanksgiving Day	Fourth Thursday in November
Day After Thanksgiving	Fourth Friday in November
Christmas Eve	December 24
Christmas Day	December 25
Floating Personal Day	Determined by colleague

## PAID TIME OFF (PTO)

BRP provides paid time off to eligible full-time and part-time colleagues to encourage a healthy work/life balance and to promote taking time away from work when feasible for rest and relaxation and to simply “do life”. Paid time off and the policies and procedures for administering the PTO benefit are based on colleague employment status (exempt or non-exempt). BRP’s PTO programs are always provided at the sole discretion of the firm and are not an entitlement or considered compensation earned for past and/or future service for time worked.

## POLICY FOR NON-EXEMPT COLLEAGUES (PAID HOURLY)

**(Effective January 1, 2022)**

In recognition of the value our dedicated professionals bring, full-time hourly-paid non-exempt colleagues receive two types of PTO: Regular PTO and Community Service PTO.

**Regular PTO** may be taken for any reason, including illness, vacation time, and other personal time away from work. Regular PTO may also be taken for any paid sick leave reason allowed under applicable law. This includes:

- for the colleagues own medical situation
- the medical condition of a family member
- for time off to deal with effects of sexual assault or domestic violence, or
- for any other reason allowed under applicable law.

To the extent an eligible colleague works in a paid sick leave jurisdiction, this policy is designed to comply with such paid sick leave laws and will be implemented in accordance with applicable law. Eligible colleagues will not receive paid sick time in addition to PTO.

**Community Service PTO** is a critical component of our Azimuth core values and is there to support each of us being community minded leaders and fostering a personal value proposition for the communities we are privileged to serve. To assist you in serving your community, we provide each colleague two (2) community service PTO hours per month to use to volunteer in the community during normal business hours. We encourage you to find an organization you are passionate about and immerse yourself in helping them achieve their mission. Eligible organizations include any local, state, or national not-for-profit (501c3) organization whose primary goal is charitable and/or educational enrichment, including churches and schools. While Community Service PTO accrues at 2 hours per month, your 24 hours per year may be used in any block of time, including full days. Unused Community Service PTO will not carry forward at the end of the year but will be forfeited. Unused Community Service PTO will not be paid out at termination of employment.

Regular PTO and Community Service PTO accruals are outlined in the table below.

Years of Continued Employment (based on anniversary date)	Less Than 1 Year	1-2 Years (beginning Jan 1 entering year of your qualifying 1 <sup>st</sup> year anniversary date)	3-4 Years (beginning Jan 1 entering year of your qualifying 3 <sup>rd</sup> year anniversary date)	>5 Years (beginning Jan 1 entering year of your qualifying 5 <sup>th</sup> year anniversary date)
Monthly Hourly Accrual	10	11.34	13.34	16.67
Days Per Year (and Hours)	15 days (120 hours)	17 days (136 hours)	20 days (160 hours)	25 days (200 hours)
Maximum Accrual Cap	15 days (120 hours)	17 days (136 hours)	20 days (160 hours)	25 days* (200 hours*)
<b>Community Service PTO</b>	2 hours per month beginning in first full month of employment; maximum of 24 hours per calendar year; no carry over			

Regular monthly PTO accrual is calculated based on your years of completed employment and your increase in accruing hours becomes available on January 1<sup>st</sup> entering the year of your qualifying anniversary date. Unused PTO will rollover from year to year, but a colleague can never accrue more than the maximum accrual cap. Once a colleague reaches the maximum accrual cap, the colleague will stop accruing additional PTO until the colleague uses PTO and drops below the maximum accrual cap. At that time, the colleague will again begin to accrue PTO up to the maximum accrual cap. Accrued but unused PTO time will not be paid at termination and will be forfeited unless required by applicable state law. Completed employment refers to contiguous employment up to the then-current date. Thus, if a colleague leaves the firm and later returns to the firm (regardless of reason for departure or return), the period of time for completed employment will be reset.

*\*For California colleagues, the maximum accrual cap is 1.25 times your annual accrual set forth in the table above.*

## SCHEDULING PTO

- Plan the dates for taking your Regular PTO time off as far in advance as possible and submit your time off request through the Workday portal as soon as you can so you have the best likelihood of having your request approved. Leaders attempt to accommodate all colleague requests for time off but must ensure doing so doesn't put an undue strain on running the business and serving our clients. Planning ahead should include a discussion with your leader with respect to appropriate backup coverage during your anticipated absence.
- In the event of unplanned and unscheduled time off needs (such as sudden illness), notify your leader right away and submit a request for unplanned PTO. Depending on your role and nature of your work, you may also need to communicate your unplanned PTO with various team members who may need to help with covering business needs.
- Life happens and we all strive to be flexible when it comes to unplanned needs to be out work, and in the event of unplanned and unscheduled time off, each of us as colleagues should be mindful of the impact on our teams when we are unable to be there. Unscheduled time off should be limited and could be considered excessive absenteeism if it becomes a recurring a pattern.
- All PTO requests must be taken in whole hour increments (no half-hour or quarter-hour increments) unless needed for a mandatory paid sick leave reason. Additionally, various business areas within BRP may have policies

within their operating areas requiring PTO requests to be taken in either half-day or full day increments (rather than individual hours). Check with your leader to determine what the practice is for your area.

- When submitting a Time Off Request through Workday, you will be asked to provide certain information about the nature of your time off so that BRP can determine if you might be eligible for certain leaves of absence requiring special notification.

## PTO AND OTHER PAID TIME OFF CONSIDERATIONS

- Colleagues must use Regular PTO for otherwise unexcused time away from work during their regularly scheduled work hours (regardless of whether working remotely or working in office).
- Your PTO benefits will be fully integrated with other benefits available to you so that at no time will you be paid more than your regular compensation.
- PTO pay is computed at each colleague's base pay rate. It does not include overtime or any special forms of compensation such as incentives, commissions, or bonuses unless required by state law.
- Colleagues are to utilize their PTO prior to any request for unpaid time off.
- PTO must be used during a leave of absence before the leave is unpaid except for birth, adoption, or placement of a child for adoption or foster care leave where PTO usage is optional. PTO cannot be applied concurrently with other forms of paid leave such as parental leave, short-term or long-term disability leave, or paid leave under state or local law.
- Certification by your health care provider may be required for absences due to your illness or injury of three or more consecutive workdays or for intermittent absences due to the same reason. Certification may also be required prior to reinstatement after one or more of those absences, or in other circumstances.
- In all states that BRP operates, accrued Regular PTO and Community Service PTO that has not been used at the time of colleague separation from the firm is forfeit and will not be paid out to the colleague upon separation unless required by applicable state law. This PTO policy is a use-it-or-lose-it policy where allowed by applicable law.

### Note:

- Benefit eligible part-time colleagues (those averaging work hours between 25-37 hours per week) will receive PTO pay at a pro-rated daily rate of 6 hours of pay (this includes: PTO, Community Service PTO, parental leave pay, bereavement leave pay, jury duty and/or voting pay, and Summertime PTO). Part-time non-benefit eligible employees working in a paid sick leave jurisdiction will be provided legally mandated paid sick leave in accordance with applicable law.
- Temporary workers (independent contractors and temporary workers secured through agencies) are not eligible for any type of PTO. Temporary workers of BRP working in a paid sick leave jurisdiction will be provided legally mandated paid sick leave in accordance with applicable law.
- Colleagues will not be discriminated or retaliated against for using PTO for paid sick leave purposes under this policy. Any colleague that believes they have been discriminated against or retaliated against for using PTO for a paid sick leave reason, should contact Human Resources.

## **PAID TIME OFF POLICY FOR EXEMPT COLLEAGUES (SALARIED)**

### **(Effective January 1, 2022)**

In recognition of the professional environment in which we work, BRP does not have a fixed amount of paid time off for eligible full-time exempt colleagues. Our exempt colleagues often work long and unconventional hours and have shown a high level of personal responsibility for managing their own time, workload, and results. To that end, we are adopting an Open PTO policy, in which eligible colleagues are afforded the flexibility to take time off as needed, with proper notification and approval from their leader. As a result, exempt salaried colleagues do not accrue vacation pay or other paid time off and this Open PTO is considered an unlimited paid time off policy.

An eligible colleague who is absent from work as a result of appropriately scheduled and approved vacation, personal time, family time, community service time, or for any reason covered by applicable paid sick leave requirements, is eligible for a reasonable amount of open paid time off (“Open PTO”) with pay under this policy. Open PTO under this policy is not being provided in addition to any pre-existing vacation, personal time, or sick leave policy, which is now superseded by this policy. This Open PTO policy is not a form of additional wages for services performed but rather a policy being implemented as part of our ongoing effort to provide a flexible work arrangement for our colleagues<sup>1</sup> (also referred to as employees for purpose of regulatory compliance in the state of California). This policy is designed to comply with and will be implemented in accordance with all applicable state and local laws including applicable paid sick leave laws.

## ELIGIBILITY

Full-time exempt colleagues are eligible to take flexible time off under this policy. Non-exempt colleagues and part-time colleagues are not eligible for paid time off under this policy (see **PAID TIME OFF POLICY FOR NON-EXEMPT COLLEAGUES** in previous section). Eligible exempt colleagues may take a reasonable amount of Open PTO, subject to business needs and applicable scheduling requirements, for vacation, personal time, family time, or sick leave, as described below. Eligible exempt colleagues will be expected to maintain satisfactory job performance and to make appropriate arrangements with their leader and team members to ensure appropriate back up for the colleague’s responsibilities during such absence.

## SCHEDULING AND APPROVAL OF OPEN PTO FOR VACATION OR PERSONAL REASONS

- Use of Open PTO for reasons other than as paid sick leave required by applicable law will be subject to traditional scheduling and approval processes. All Open PTO requests must be approved in advance.
- Eligible colleagues needing to take Open PTO for vacation or personal reasons should provide at least two (2) weeks advance notice to their leader of the need to take time off for vacation or personal reasons. This is necessary so that the business area can continue to take care of clients and manage day to day operations when colleagues are away.
- Leaders will try to accommodate time off requests as much as possible but must be able to balance coverage needs for the team and therefore need to know the availability of eligible colleagues when taking time off under this policy. BRP and business area leaders reserve the right to deny requests for Open PTO for non-paid sick leave reasons, but again will do their best to accommodate them when advance requests are given.
- All colleagues must submit a Time Off Request for paid time off through the Workday portal and schedule approved time off on their calendar. It’s important for business area leaders to track and manage time off so we can keep our business running.
- Each business area will continue to have business rules in place for approving time off requests and leaders may also restrict time off periods for a variety of business needs. Check with your leader for any specific time off rules for your area, but some of the more general guidelines include the following:
  - There may be restricted time off periods where time off for reasons other than paid sick leave will not be approved (e.g., holiday weeks with peak client demands, various time periods with high volume of work activity such as quarterly or monthly close-out processes).
  - There may be restricted time off periods due to special projects or special business needs.
  - There may be restricted time off periods due to new partnership integrations.
- In addition to general guidelines around the operating needs of the department, leaders may also restrict time off requests for individual colleagues who are not currently successfully performing their job responsibilities or have too much work to complete at the time of the PTO request.
- At all times, this policy will be implemented in accordance with applicable paid sick leave laws.

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<sup>1</sup> To comply with guidance for the state of California, please note that BRP nomenclature refers to all employees as colleagues.

## USE OF PTO

Colleagues will not accrue or carry over Open PTO and colleagues will have no PTO bank of time. Similarly, Open PTO will not be paid out upon termination. Eligible colleagues may use Open PTO for traditional vacation purposes, personal needs, community service PTO, as well as for any absence protected by applicable paid sick leave laws, including to:

- attend appointments or receive care for the colleague's own physical or mental illness, injury, or medical condition, including conditions requiring home care, professional medical diagnosis or treatment, or preventive care; or
- attend appointments or provide care for an eligible family member's physical or mental illness, injury, or medical condition, including conditions requiring home care, professional medical diagnosis or care, or preventive care; or
- address the psychological, physical, or legal effects of domestic violence, harassment, sexual assault, or stalking involving an employee or a family member, or
- take time off when a colleague's place of business or a child's school or place of care has been closed by order of a public official due to a public health emergency or for other health-related reasons; or
- take time off when a colleague or a family member is quarantined by a public health authority or health care provider; or
- any other reason allowed by applicable state or local law.

## ABUSE OF OPEN PTO

Abuse of PTO, including as legally-mandated paid sick leave under federal, state, or local law, may result in disciplinary action up to and including termination. Although there is no fixed amount of vacation, personal, or sick time, disciplinary action may be taken if a pattern suggesting abuse of Open PTO develops. BRP also reserves the right to require documentation verifying use of Open PTO for paid sick leave purposes if there are indications of a pattern of abuse, such as repeated use of unscheduled Open PTO on or adjacent to weekends, holidays, or pay day, regardless of whether the colleague has used Open PTO for more than three (3) consecutive workdays. Likewise, disciplinary action may be taken if a colleague is failing to attain or sustain necessary performance goals for his or her position due to excessive Open PTO unrelated to legally-mandated paid sick leave or other legally protected leave. All eligible colleagues are expected to perform their job duties satisfactorily and to ensure that all necessary work is timely completed when using PTO under this policy.

## NOTIFICATION FOR OPEN PTO AS LEGALLY-MANDATED PAID SICK LEAVE

If the need for Open PTO is related to any legally-mandated paid sick leave requirement and is **foreseeable**, colleagues should provide advance notice as soon as possible, preferably at least seven (7) days in advance. If the need for Open PTO is related to any paid sick leave requirement under state or local law and is **unforeseeable**, colleagues shall provide notice of the need for Open PTO as soon as practicable.

Eligible colleagues should notify their leader if they will be taking Open PTO in excess of three (3) consecutive business days for sick purposes. Colleagues needing PTO under this policy in excess of three days may be eligible for FMLA and the leader, and/or colleague, should contact Human Resources to discuss and determine if the colleague may qualify for and be eligible for time off under FMLA.

## OPEN PTO AND OTHER APPROVED LEAVES

Open PTO is not intended for long-term leave or as a long-term care solution. Colleagues that are on an approved leave of absence may not use Open PTO under this policy unless specifically allowed as paid sick leave under applicable law or as set forth below. BRP offers paid leave for colleagues needing leave for their own illness or disability. In those situations, colleagues are not entitled to use Open PTO under this policy except as provided below in conjunction with BRP's short-term disability (STD) policy. Similarly, colleagues working in certain states may be eligible for state-provided paid medical and/or family leave benefits. Colleagues will not be entitled to use Open PTO under this policy in addition to any other supplemental pay benefit.

BRP offers colleagues STD after a two-week elimination period. If a colleague needs a leave of absence that qualifies for STD, the colleague must apply for short-term disability benefits through the state-provided plan or, if applicable, the firm-provided plan, by contacting Human Resources to initiate a disability claim. Absences covered by short-term disability are not eligible for compensation under this PTO policy except during the two-week elimination period. After the waiting period, colleagues will not be eligible to use any additional PTO under this policy but will be limited to the benefits available under the terms of the STD benefit plan, firm-provided paid parental leave, or applicable state-provided paid benefit. If BRP becomes aware that an absence may qualify for short-term disability benefits, Human Resources will direct the colleague to work through the HR Benefits team to apply for short-term disability benefits. Any medical STD leave will run concurrent with leave under FMLA if the colleague is eligible for FMLA leave and any other state law entitlement.

Likewise, if a colleague is absent for any other reason covered by the federal Family and Medical Leave Act ("FMLA") or similar state laws, the colleague should contact Human Resources to apply for state and/or federal family medical leave ("FMLA leave"). Absences covered as FMLA leave, state family or medical leave, or any other state law are not eligible for compensation under this Open PTO policy except as set forth below. For any eligible colleague that needs FMLA leave or a similar leave under state law, BRP will allow the colleague to use Open PTO for up to two (2) weeks during any eligible block leave. All paid and unpaid FMLA or state leave will run concurrently. Any leave after two weeks will be unpaid unless the colleague is entitled to leave under state law. Use of PTO under this policy is limited to two weeks of leave per leave request for the same reason. [For example: if a colleague takes a medical leave and returns to work for one week but has to go back out on leave for the same medical reason, the colleague is not entitled to use up to two weeks of Open PTO again.] Additionally, PTO cannot be used concurrently with any other supplemental pay provided under state or local law. If a colleague is eligible for paid leave under state law, the colleague is not entitled to use up to two weeks of Open PTO during the leave and limited to the state law paid benefit.

For information or questions concerning this policy and the use of Open PTO during otherwise unpaid leaves of absence, short-term disability, or FMLA or state leave, contact Human Resources for assistance. All leaves of absence will run concurrently. This open paid time off policy is not designed to be used during extended absences from work when necessary, under FMLA, workers' compensation, ADA reasonable accommodation medical leave, or other similar state or local leaves.

*Exception:* The only exception to this policy is time off for parental bonding leave. BRP provides eligible colleagues paid parental bonding leave to bond with a child after birth or placement for adoption or foster care. Colleagues may *not* use Open PTO under this policy for parental bonding leave purposes as BRP provides a more favorable paid time off benefit under a separate policy. Colleagues may not use Open PTO to extend paid time off for parental bonding leave purposes. *Please see the Parental Leave policy for more information.*

## NO RETALIATION

To the extent that state or local laws mandate the accrual and use of paid sick leave, this policy is intended to ensure that eligible colleagues who work in those jurisdictions receive paid sick leave in accordance with these requirements. BRP prohibits discrimination or retaliation against colleagues because of a request for Open PTO for legally-protected paid sick leave purposes, or use of such PTO. If you believe that you have been treated unfairly on account of your use of such PTO, or request for such PTO, please immediately report this concern to Human Resources so that the matter may be reviewed, and appropriate corrective action may be taken if necessary.

# PAID LEAVE BENEFITS

## PAID PARENTAL LEAVE

It's a joyous and exciting time in life when a new child joins the family! BRP provides new Moms and New Dads with six weeks of paid parental leave, paid at 100% of weekly pay to care for a new child because of birth, adoption (other than adoption of a stepchild), or placement. Full-time colleagues get 40 hours and part-time colleagues who are benefits eligible get 30 hours. This benefit must be used within 12 months of the birth, adoption, or placement of a child and is granted once in a 12-month period. All full-time colleagues with one year of service are eligible to take paid parental leave and separate and in addition to any other paid leave you may be eligible for. Contact your HR Partner or the HR Benefits team with questions about this benefit.

## BEREAVEMENT

Recognizing that a time of bereavement is very difficult, every effort will be made to ensure that a bereaved colleague can attend to family matters. Colleagues should notify their direct leader or team lead as soon as possible when they need time off due to bereavement.

Absence due to a death in the immediate family will be paid to colleagues for up to 5 business days. The immediate family is defined as the colleague's parents, stepparents, parents-in-law, spouse, domestic partner, child(ren), stepchildren, sibling, grandparents, and grandchildren. You may be eligible for 1 paid day for the death of a non-immediate family member. In addition, all benefit eligible colleagues are eligible for one day of bereavement leave to grieve the loss of a loved pet.

Any additional time needed can be used from your PTO benefit with the approval of your leader. Leaders may also approve additional unpaid time off if appropriate to allow for any arrangements or activities that must be made in association with the death.

## JURY DUTY & VOTING LEAVE

We encourage you to fulfill your civic responsibility by serving on a jury when required to do so. If a regular full-time or part-time colleague is called for jury duty, the colleague will be paid for days they would have normally been scheduled to work (and for the number of hours they would have normally been scheduled to work), up to a maximum of five (5) working days. Jury duty pay will not be counted as hours worked for determining overtime. If you must serve beyond the five working day period, you may use any available paid time off from your PTO benefit or you may request an unpaid leave of absence.

If you are called for jury duty, you must notify your direct leader or team lead as soon as possible so arrangements can be made to accommodate your absence. Provide a copy of the Summons along with your notification to Human Resources so your Jury Duty time can be paid. You are expected to report to work whenever the court schedule permits.

Finally, BRP encourages all Colleagues to participate and exercise their right to vote. BRP provides colleagues up to a maximum of 3 hours of paid leave for the purposes of in-person voting (unless state or local law requires otherwise). Prior to exercising such leave for voting, please coordinate with your leader to ensure that BRP's business operations are covered. BRP complies with all state or local laws regarding voting.

# **YOU ARE HERE**

## **COLLEAGUE HANDBOOK**

**SECTION 1: ABOUT BRP**

**SECTION 2: WHAT WE EXPECT FROM YOU (PROMISES FROM COLLEAGUES)**

**SECTION 3: WHAT YOU CAN EXPECT FROM US (PROMISES TO COLLEAGUES)**

**SECTION 4: COMMUNICATION**

**SECTION 5: MY BENEFITS**

**SECTION 6: WORK HOURS, TIME OFF, AND LEAVES OF ABSENCE**

**SECTION 7: ETHICS AND CODE OF CONDUCT**

**SECTION 8: WE CARE ABOUT YOUR SAFETY**

**SECTION 9: GENERAL OPERATING GUIDELINES**

**SECTION 10: STATE ADDENDUMS**

## Section 6: Work Hours, Time Off, & Leaves of Absence from us

### *Valuing colleague time and supporting colleague needs*

#### RECORDING WORK TIME

Colleagues are required to accurately record their own time worked in BRP's time keeping system. Colleagues may not record time for other colleagues. To do so would subject both colleagues to discipline, up to and including termination. Each week, colleagues must review their time and report any errors to their direct leader or designated time administrator immediately, so the error may be corrected. Failure to review and report any errors in the colleague's time shall be deemed an acceptance and acknowledgement that the time reported in the BRP time keeping system is accurate.

#### OVERTIME

Overtime is time worked over 40 hours in the same work week and as otherwise required by state and federal law. All non-exempt colleagues will be paid under the requirements of law. Your direct leader or appropriate team lead or Managing Director must approve any overtime worked in advance. Exempt colleagues are not eligible for overtime pay. Paid Time Off (PTO) and Holiday time are not added in when calculating overtime hours.

**NOTE ON COMPENSATION:** If you are eligible for a bonus (i.e., performance based) in addition to your regular wages, over-time and/or commissions, the bonus is not earned by you unless you are employed with BRP on the date that it is paid.

#### LUNCH AND BREAKS

Colleagues who do not receive meal breaks under applicable law, may take a thirty-minute uninterrupted, unpaid, non-working lunch break. Lunch and break schedules will vary depending on each office location and specific team needs. Although the firm does not have an official policy regarding lunch and breaks, breaks should be taken away from your work area to ensure that your time is uninterrupted.

For questions or concerns regarding lunch and break schedules, please contact your direct leader or team lead.

#### PAY PERIODS

All non-exempt colleagues are paid every other week. Exempt colleagues are paid either semi-monthly (15<sup>th</sup> and last day of the month), monthly, or bi-weekly, except on holidays, weekends, or other prescheduled office closings. Beginning in June 2022, exempt colleagues will transition to the bi-weekly pay schedule used throughout BRP.

Direct deposit is our primary form of payroll processing. You may sign up for direct deposit at any time and may change your direct deposit account(s) at any time via the Workday portal. For unique circumstances where a colleague prefers to receive a payroll check, BRP can support this preferred form of payment.

#### PAYROLL DEDUCTIONS

BRP is required by law in some circumstances to recognize certain court orders, liens, and wage garnishments. When the firm receives a notice of a pending garnishment or wage assignment, you will be notified. Additionally, the firm is required by law to make proper deductions from your earnings on your behalf. Amounts withheld vary according to your earnings,

marital status, government employment regulations, and other factors. Mandated withholdings include Federal Income, Social Security & Medicare (FICA) Taxes. Other voluntary deductions may be deducted from your paycheck, including health insurance coverage, dental insurance coverage, 401(k), or any other offered deductions that can be elected by a colleague.

## GENERAL INFORMATION ABOUT LEAVES OF ABSENCE

The firm may grant a leave of absence in certain emergency, medical, or personal circumstances that fall outside of our existing PTO, Bereavement, and Jury Duty policies. Notify your Leader and contact AbsencePro at 1-866-335-4881 when you learn you may need a leave of absence.

The firm grants unpaid leaves of absence for periods of absence for medical, family, personal and other reasons. A colleague may not work for any other company during his or her leave of absence from the firm.

## SHORT-TERM DISABILITY (STD)

BRP colleagues who work at minimum 25 hours a week or more are eligible for Short-Term Disability (STD) for their leave of absence resulting from a non-work-related serious illness or injury.

The disability period is the first continuous period of absence beginning with the first day colleagues are eligible for benefits. There is a 14-calendar day elimination period before receiving short-term disability benefits. The maximum number of weeks that benefits are payable for a continuous period of Disability is 11 weeks. STD benefits are 60% of a colleague's weekly pre-disability income as defined by the plan up to the weekly plan maximum

Please note, colleagues requesting STD that runs concurrent with a leave of absence must use PTO for absences that are unpaid once the STD benefit period has ended (unless a specific BRP Leave of Absence benefit indicates otherwise).

## LONG-TERM DISABILITY (LTD)

BRP colleagues who work at minimum 25 hours a week or more are also eligible for Long-Term Disability (LTD) for their leave of absence resulting from a non-work-related serious illness or injury that continues beyond 11 weeks.

The disability period begins on the first date the disability is approved by the insurance provider. The elimination period is 90 calendar days from the date of disability. A colleague may be eligible to receive LTD benefits up to age 65, your social security retirement age, or 3 years and 6 months, whichever is longest, as long as you meet the definition of long-term disability under the plan. LTD benefits provide 60% of a colleague's monthly pre-disability income as defined by the plan up to the monthly plan maximum.

Please note, the duration of LTD benefits is determined by the plan.

## FAMILY AND MEDICAL LEAVE ACT (FMLA)

Under the Family and Medical Leave Act of 1993, as amended (FMLA), colleagues may be eligible for a period of job-protected unpaid leave for certain family and medical reasons as described below. This Family Medical Leave Act Policy (“Policy”) provides an overview of colleagues’ rights and responsibilities under the FMLA as well as BRP’s own policies regarding FMLA Leave. BRP has posted notices of the FMLA at all office locations. The information in those posters is incorporated into this policy by reference.

### GENERAL ELIGIBILITY

To be eligible for FMLA Leave under this Policy, a colleague must have worked at BRP for at least 12 months and must have worked at least 1,250 hours during the 12-month period prior to the commencement date of any leave requested under this policy. Eligibility will be determined as of the date the FMLA leave commences. Colleagues who work at an office location at which fewer than 50 colleagues are employed within a 75-mile radius are not eligible for leave under this policy. When a request for FMLA is made, BRP will advise of the colleague’s eligibility and the colleague’s rights and responsibilities.

### TYPES AND DURATION OF FMLA LEAVE

Bonding Leave; Serious Health Condition Leave; Leave to care for a family member with a Serious Health Condition; Active Duty Leave

An eligible colleague may take up to 12 weeks of unpaid leave during a rolling 12-month period (measured backward from the date a colleague uses FMLA leave) for the following reasons:

- the birth of the colleague’s child and to bond with the child; or for placement through adoption or foster care and to bond with the newly placed child. Such leave must be concluded no later than 12 months after the birth or placement of the child with the colleague;
- to care for an immediate family member (spouse, child under 18 years old or a child 18 and over who is incapable of self-care because of a disability, or parent) with a serious health condition;
- because of a serious health condition which renders the colleague unable to perform the functions of his/her job; or
- because of any qualifying exigency arising out of the fact that a colleague’s spouse, son (of any age), daughter (of any age) or parent, who is serving in any branch of the US military (including the National Guard or Reserves), has been deployed or called to active duty in a foreign country (“Active Duty Leave”).

### DEFINITION OF SERIOUS HEALTH CONDITION

A “serious health condition” as referred to above means an illness, injury, impairment, or physical or mental condition that involves:

- in-patient care (i.e., an overnight stay) in a hospital or other medical care facility (including any period of incapacity or any subsequent treatment in connection with such in-patient care);
- 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 that also involves: (i) treatment two (2) or more times by a health care provider or under the supervision of a health care provider the first being within seven (7) days of the onset of the incapacity and the second being within thirty (30) days of the start of the incapacity, or (ii) treatment by a health care provider on at least one (1) occasion within seven (7) days of the start of the incapacity which results in a regimen of continuing treatment under the supervision of a health care provider;
- any period of incapacity or treatment due to pregnancy, or for prenatal care;
- any period of incapacity or treatment due to a chronic serious health condition requiring periodic visits of at least twice a year for treatment by a health care provider;

- a period of incapacity or treatment which is permanent or long-term due to a condition for which treatment may not be effective, during which the colleague (or family member) must be under the continuing supervision of, but need not be receiving active treatment by, a health care provider; or
- any period of absence to receive multiple treatments by a health care provider or under the supervision of a health care provider, either for restorative surgery after an accident or other injury, or for a condition that will likely result in a period of incapacity of more than three (3) consecutive calendar days in the absence of medical intervention or treatment.

## MILITARY CAREGIVER LEAVE

A colleague also may be eligible for Military Caregiver Leave to care for a spouse, son (of any age), daughter (of any age), parent or next of kin who is: 1) a current member of the Armed Forces, including the National Guard or Reserves, and who is undergoing medical treatment, recuperation, or therapy, is otherwise in outpatient status, or is otherwise on the temporary disability retired list, for a serious injury or illness, which is incurred in the line of duty (or for a pre-existing injury or illness which is aggravated in the line of duty) and that renders the service member medically unfit to perform the duties of his or her office, grade, rank or rating, or 2) a veteran who was a member of any branch of the Armed Forces, including the National Guard or Reserves, and who is undergoing medical treatment, recuperation, or therapy, for a serious injury or illness that occurred in the line of duty (or for a pre-existing injury or illness which was aggravated in the line of duty) at any time within 5 years preceding the treatment, recuperation or therapy. A covered veteran incurs a serious illness or injury for purposes of this paragraph when one of the following occurs:

- The injury or illness makes him or her medically unfit to perform the duties of his or her office, grade, rank or rating.
- It causes the service member to have a VA Service Disability Rating is at 50% or greater.
- It is a mental or physical condition substantially impairs their ability to obtain gainful employment.
- The VA enrolls the employee in the Department of Veteran Affairs Program of Comprehensive Assistance for Family Caregivers.

Eligible colleagues are entitled to a total of 26 weeks of unpaid Military Caregiver Leave during a single 12-month period. This single 12-month period begins on the first day an eligible colleague takes Military Caregiver Leave (as long as it is within 5 years of the covered service member's active duty) and ends 12 months after that date. Military Caregiver Leave applies on a per-covered service member, per-injury basis, so that a colleague may be eligible to take more than one 26-week period of Military Caregiver Leave, but no more than 26 weeks of leave may be taken during any one 12-month period.

An eligible colleague is entitled to a combined total of 26 workweeks of leave for all FMLA qualifying reasons during the single 12-month period described above. For example, if a colleague takes 10 weeks of FMLA leave due to his/her own serious health condition, the colleague may take only 16 weeks of Military Caregiver Leave during that same 12-month period.

A "qualifying exigency" referenced under the "Active Duty Leave" section above (TYPES AND DURATION OF FMLA LEAVE) refers to the following circumstances:

- Short-notice deployment: to address issues arising when the notification of a call or order to active duty is seven (7) days or less;
- Military events and related activities: to attend official military events or family assistance programs or briefings;
- Childcare and school activities: for qualifying childcare and school related reasons for a child, legal ward or stepchild of a covered military member;
- Care of the covered military member's parent if the parent is incapable of self care;
- Financial and legal arrangements: to make or update financial or legal affairs to address the absence of a covered military member;

- Counseling: to attend counseling provided by someone other than a health care provider for oneself, for the covered military member, or child, legal ward, or stepchild of the covered military member;
- Rest and recuperation: to spend up to fifteen (15) calendar days for each period in which a covered military member is on a short-term rest leave during a period of deployment; or
- Post-deployment activities: to attend official ceremonies or programs sponsored by the military for up to 90 days after a covered military member's active duty terminates or to address issues arising from the death of a covered military member while on active duty.

## WHEN SPOUSES WORK TOGETHER

If both spouses are employed by BRP and are eligible for leave under this policy, they are eligible for a combined total of 12 weeks of leave within the applicable 12-month period when the leave is due to the birth or placement of a child or to care for a parent who has a serious health condition, or a combined total of 26 weeks within the applicable 12-month period when the leave is due to the birth or placement of a child or to care for a parent who has a serious health condition and for Military Caregiver Leave. (However, in no event shall the spouses take more than a combined total of 12 weeks of leave within the applicable 12-month period for the birth or placement of a child or to care for a parent who has a serious health condition).

## NOTICE OF NEED FOR FMLA LEAVE

A colleague who wants to take FMLA must follow normal call-in policies and notify their leader (or whoever they would normally notify for an absence). Failure to adhere to normal firm call-in procedures can result in discipline, as with any other type of leave.

If FMLA applies or believed to possibly apply, the colleague will be required, thereafter, to contact their designated Human Resources Partner to complete a request for leave (and thereafter continue to coordinate with the designated HR Operations Specialist managing the leave through AbsencePro). The colleague will be required to fill out prescribed forms requesting leave.

To avoid a delay in FMLA protection, the colleague must give notice as soon as possible and practicable under the circumstances of enough facts to advise the person receiving the call that FMLA may apply. Colleagues are always required to give notice as soon as practicable and possible, but, except for instances of active duty leave, a colleague is not required to provide more than thirty (30) days advance notice.

If a colleague fails to give the required notice with no reasonable excuse, FMLA coverage may be delayed for a period of time. This can result in discipline for absences taken prior to FMLA coverage commencing.

Colleagues should make every reasonable effort to schedule foreseeable medical treatments so as not to disrupt the ongoing operations of BRP.

## SUBSTITUTION OF PAID LEAVE FOR UNPAID FMLA LEAVE

Colleagues must concurrently exhaust any short-term disability benefits, workers' compensation benefits, accrued PTO/vacation time, or any other form of applicable paid leave for FMLA leave. All substituted paid leave that is being concurrently exhausted will be counted toward an eligible colleague's FMLA leave entitlement.

## INTERMITTENT FMLA LEAVE

Intermittent or reduced schedule leave is leave at varying times for the same qualifying condition. Intermittent leave or reduced schedule leave may be available if the need for leave is due to a colleague's serious health condition or a colleague's immediate family member's serious health condition and when the need for intermittent or reduced schedule

leave is certified by a health care provider. Intermittent or reduced schedule leave is not available for the birth or placement of a child for adoption or foster care, unless BRP agrees. Military Caregiver Leave may be taken intermittently or on a reduced leave schedule when medically necessary. Active Duty Leave may also be taken on an intermittent or reduced leave schedule.

Colleagues who take foreseeable intermittent or reduced schedule leave must attempt to schedule their intermittent or reduced schedule leaves so as not to disrupt the operations of BRP and in some instances, BRP may require colleagues taking foreseeable intermittent or reduced schedule leaves to transfer temporarily to an alternative position for which the colleague is qualified and which better accommodates the colleague's leave schedule. Pay and shifts would not be affected by a change to an alternate position. Time worked in the alternate position would not count towards the colleague's FMLA leave entitlement.

Colleagues taking unforeseeable intermittent leaves must follow the firm's standard call-in procedures absent unusual circumstances.

## DOCUMENTATION SUPPORTING FMLA LEAVE

A colleague requesting leave for a serious health condition must provide a completed FMLA Certification of Health Care Provider Form supporting the need for the leave. A request for reasonable documentation of family relationship verifying the legitimacy of a request for FMLA Leave may also be required.

The colleague will have fifteen (15) days in which to return a completed Certification form following BRP's request for the certification. If the colleague fails to provide timely certification after being required to do so, covered leave may be delayed moving forward until the certification form is finally submitted. Absences counted against the colleague for a late certification will not be reversed absent exceptional circumstances. If a colleague never returns the completed form, the FMLA will be denied and the absences will be unprotected. If the Certification form is incomplete or insufficient, a colleague will be given written notification of the information needed and will be given a period of seven (7) days to provide the necessary information.

In some circumstances, a second opinion, at the expense of BRP, related to the health condition may be required. If the original certification and the second opinion differ, a third opinion, at the expense of the firm, may be required. The opinion of the third health care provider, which BRP and the employee jointly select, will be the final and binding decision.

A request for Active Duty Leave must be supported by the Certification of Qualifying Exigency for Military Family Leave form as well as appropriate documentation, including the covered military member's active duty orders.

A request for Military Caregiver Leave must be supported by the Certification for Serious Injury or Illness of Covered Servicemember form or Certification for Serious Injury or Illness of a Veteran for Military Caregiver Leave form as well as any necessary supporting documentation.

Providing false information to BRP in an attempt to obtain FMLA leave will result in no FMLA protection, and it may also constitute a policy violation and result in discipline up to and including discharge.

Once BRP has received a complete and sufficient certification form from the colleague, BRP will advise the colleague whether he or she has been approved or denied FMLA and, if possible, will advise how much FMLA will be used.

## RECERTIFICATION

In the following circumstances, BRP may, in its sole discretion, require recertification of the qualifying reason for FMLA:

- (1) where the colleague needs more leave than the original certification justified;
- (2) where circumstances and facts cast doubt on the colleague's need for FMLA; or
- (3) when the need for FMLA extends beyond 6 calendar months.

In these situations, the colleague will have fifteen (15) days in which to provide a completed Recertification form.

## RESTORATION TO POSITION AND BENEFITS

Healthcare benefits will be maintained while a colleague is on FMLA, subject to the payment of premiums explained in this paragraph. For all other benefits, they will be maintained similarly to others on similar forms of leave (paid/unpaid). Colleagues on paid FMLA (because they are concurrently exhausting a paid leave benefit) will continue to have their premium payments deducted from their paycheck as if they were on non-FMLA paid leave. Colleagues on an unpaid FMLA leave (for which no paid leave is substituted or after all paid leave has been exhausted) will need to maintain the benefits they accrued prior to commencement of the leave by making premium payments. If the payment is not received on the due date or thereafter, the firm will provide the colleague written notice of non-payment and provide 15 days to make the payment. If the payment is not made within the 15 day window, and at least 30 days have passed from the due date, then coverage under the benefit plan will lapse, retroactively to the original due date.

Colleagues are permitted to return to whatever position they would have held had they not taken FMLA leave. Generally, this means colleagues returning from FMLA leave within 12 weeks will be returned to the job position that they held when they went on leave, or a substantially similar one. If the colleague would have lost their position even if they had not taken the leave, then there exists no reinstatement right. For example, if the colleague's position is eliminated because of a reduction in force, then no reinstatement right exists.

If an eligible colleague fails to pay his or her portion of the required premium payments for benefit coverage, and BRP elects to make the colleague's portion of premium payments to keep benefit coverage in effect during a period of paid or unpaid FMLA leave for medical and dental benefits, and/or a period of unpaid FMLA leave for other benefits, BRP may recover the amount of the premium payment from the colleague regardless of whether the colleague returns to work. BRP may recover its own share of the premiums paid for maintaining a colleague's medical and dental benefit coverage during any period of unpaid FMLA leave if the colleague fails to return from leave after entitlement has expired, provided the colleague's failure to return to work for a reason other than the continuation, recurrence, or onset of a serious health condition was unrelated to the qualifying reason the colleague took FMLA leave.

## RETURN TO WORK

FMLA leave must be used for its intended purpose. If the qualifying reason for taking leave ends, then the colleague must contact BRP and make arrangements to return to work. Colleagues on FMLA leave must periodically inform the Human Resources Department of their status and intent to return to work while on FMLA leave. Colleagues returning from FMLA leave must be able to assume all of the essential functions of their jobs upon return. BRP will provide time for the colleague to learn of any changes or new technology implementations. As a condition to restoring a colleague whose leave was based on the colleague's own serious health condition, the colleague must provide certification from the colleague's health care provider stating that the colleague is able to resume work. This return-to-work statement is required for all serious health conditions unless the colleague has previously provided one for that condition within the past year. If safety issues exist, the Company may require a return-to-work statement every thirty days.

## FAILURE TO RETURN FROM LEAVE

Unless required otherwise by law a colleague granted a leave of absence under these provisions who fails to return to work upon expiration of the leave will no longer have protected absences. Further absences would count against the attendance policy.

## KEY EMPLOYEES

A colleague who qualifies as a "key employee" may be denied restoration of employment after a period of FMLA leave if holding the colleague's position would cause BRP grievous economy injury. A "key employee" is a colleague who is salaried

and is among the highest paid ten percent of the work force within 75 miles of the place where the colleague reports to work. Upon requesting FMLA leave, a colleague will be notified by BRP of his/her status as a “key employee” if there is a possibility that BRP may deny reinstatement after leave.

### INTERACTION WITH STATE LEAVE LAWS

Certain states require employers to provide greater or different job-protected leave. When applicable, BRP complies with all such leave laws. When leave provided under one of these laws is covered under the federal FMLA, it also shall count toward the colleague’s federal FMLA entitlement and as FMLA Leave under this Policy. These leave laws vary by state, and the colleague should contact Human Resources if you there are questions about them.

### **NON-FMLA MEDICAL LEAVE**

A colleague in their first year of employment that experiences their own serious health condition and has not met the eligibility requirements under FMLA may submit a request for Short Term Disability and/or unpaid leave.

### **MILITARY SERVICE LEAVE**

USERRA, and applicable state law, governs the company’s responsibility to reinstate colleagues to the same or similar position upon the colleague's return from military service leave, with no loss of seniority.

# **YOU ARE HERE**

## **COLLEAGUE HANDBOOK**

**SECTION 1: ABOUT BRP**

**SECTION 2: WHAT WE EXPECT FROM YOU (PROMISES FROM COLLEAGUES)**

**SECTION 3: WHAT YOU CAN EXPECT FROM US (PROMISES TO COLLEAGUES)**

**SECTION 4: COMMUNICATION**

**SECTION 5: MY BENEFITS**

**SECTION 6: WORK HOURS, TIME OFF, AND LEAVES OF ABSENCE**

**SECTION 7: ETHICS AND CODE OF CONDUCT**

**SECTION 8: WE CARE ABOUT YOUR SAFETY**

**SECTION 9: GENERAL OPERATING GUIDELINES**

**SECTION 10: STATE ADDENDUMS**

## Section 7: Ethics, Code of Conduct, & Information Technology

*Operating as a firm worthy of respect, trust, and admiration*

### NO-CONFLICT POLICY – MANAGING PERSONAL RELATIONSHIPS

BRP is proud to be a family oriented firm and while we encourage colleagues to recruit family members and friends to work with us, we want to limit problems that may arise as a result of these colleagues working together. We've established a No-Conflict Policy. This policy applies to colleagues related by birth, marriage, legal partnership, or adoption. It also applies to colleagues who may be romantically, emotionally, or physically involved, which we call friends.

In general, we don't allow a relative or friend to be in a direct supervisory role over another relative or friend. We will try to consider alternative arrangements to resolve a situation if a problem regarding this policy arises. In addition, alternative arrangements may be determined to be necessary or better for the business if there is a perception of bias or favoritism (or any other conflict) in the office or team environment, even if no direct reporting relationship is present.

If you have a relative or friend relationship that has a potential to create a conflict, let either the Regional President of your area or your designated HR Partner know so that arrangements can be considered to avoid any potential issues.

### OUTSIDE EMPLOYMENT

The firm recognizes that colleagues sometimes seek additional employment during their off hours. We ask these colleagues to remember that, despite any outside employment, their position with the firm is their primary responsibility. You are required to report any outside employment to your direct leader or appropriate team lead so it can be evaluated for potential competitive conflicts.

### BACKGROUND CHECKS AND MOTOR VEHICLE REPORTS

For certain positions, the firm may require background checks. As part of your new hire packet, you received a stand-alone disclosure statement and signed an authorization allowing us to contact previous firms and references, and to conduct background inquiries. Background inquiries may include criminal convictions, consumer credit, the department of motor vehicles and other reports from various federal, state and other agencies that maintain historical records, as permitted by law. In compliance with the Fair Credit Reporting Act, a Summary of Rights is available upon request.

If you drive as part of your business responsibilities, you must report any traffic citation or traffic related arrest immediately to the Company. Failure to timely report any traffic citation or traffic related arrest, may result in discipline, including but not limited to termination. If a traffic citation or traffic related arrest results in a determination by our Automobile Carrier it can no longer insure you, and we cannot accommodate, it may cause termination of your employment.

### CONFIDENTIALITY

The general nature of our business demands the utmost confidentiality. Each BRP colleague must sign a Protective Agreement and/or Restricted Covenants Agreement, and some colleagues (based on their role) may also need to sign Confidentiality, Non-solicitation, and Non-acceptance Agreements. All colleagues are expected to comply with the terms

of the agreements they sign. Upon separation of employment from BRP, colleagues will receive a copy of the signed Confidentiality, Non-solicitation, and Non-acceptance Agreement.

All records and files maintained by the firm are confidential and remain the firm's property. Records and files are not to be disclosed to any outside party without the express permission of the Managing Director. In addition, any colleague whose job requirements expose them to Protected Health Information (directly or potentially) is subject to Health Insurance Privacy and Accountability Act (HIPAA) and requires special training to keep Personal Health Information (PHI) private.

All colleagues are reminded of their duties and responsibilities under the Protective Agreement, including but not limited to the restrictive covenants, and class action waiver and waiver of jury trial pertaining to disputes between colleague and BRP relating to their hiring, employment, or termination thereof.

## PRIVACY

Colleagues have no right of privacy as to any information or file maintained in or on firm property. To inspect, investigate or search colleagues' files or documents, BRP may override any passwords, codes, or locks under the best interests of the firm, its colleagues, or its clients or visitors.

Colleagues may access only files or documents they have permission to enter. Unauthorized review, duplication, dissemination, removal, damage, or alteration of files, or other property of BRP, or improper use of information obtained by unauthorized means, may be grounds for corrective action, up to and including termination.

## BUSINESS ETHICS AND BUSINESS CONFLICTS OF INTEREST

### CODE OF ETHICS POLICY

The firm maintains high ethical standards and professionalism in the conduct of its business affairs and expects the same commitment from each colleague. The intent of this policy is that each colleague will conduct the firm's business with integrity and comply with all applicable laws in a manner that excludes considerations of personal advantage or gain.

### PROHIBITION OF IMPROPER PAYMENTS

BRP requires all colleagues to use only lawful practices involving governmental authorities. Incentives offered to induce or reward specific buying decisions and/or actions are strictly prohibited. No colleague of BRP shall offer to make direct or indirect payments of value in the form of compensation, gifts or contributions or otherwise to any of the following:

- Persons or firms employed by or acting on behalf of any client for the purpose of rewarding favorable actions in a transaction.
- Any governmental officials, political parties or officials of a party or candidate for political office, for the purpose of rewarding favorable actions or influence of the official, party or candidate.

The stipulations of this section are not applicable to ordinary, reasonable business entertainment expenses and gifts of no substantial value.

### REPORTING TO LEADERSHIP

Any colleague who must authorize, make or agree to a payment which may be contrary to this policy must report this information to his/her Managing Director or Team lead immediately. If a colleague learns that a fellow colleague is

engaging in conduct contrary to this policy, he/she must report this information immediately to his/her Managing Director or Team lead.

## ANTITRUST LAWS

Antitrust laws are relevant to many business decisions, and those who engage in illegal actions against such laws are subject to fines or imprisonment, or both. BRP Leadership shall guide the organization in abiding by antitrust decrees applicable to the organization. BRP adheres that it will comply with all U.S. antitrust laws applicable to normal business operations and will hold colleagues responsible for abiding by these legislations as well. In compliance with Section I of the Sherman Antitrust Act:

- No colleague shall enter into an agreement (expressed or implied; formal or informal; written or oral) with any competitor restricting any of the following conditions or business offering prices, costs, profits, offerings of products and services, terms of sale conditions, production or sales volume, production capacity, market share, quote decisions, client selection, sales territories, or distribution methodology.
- No colleague shall enter into an agreement with a purchaser/lessee restricting the right of the purchaser/lessee to determine the price to resell or lease the product in question. Colleagues may also not enter in such agreements when BRP is the purchaser/lessee in the agreement.
- The following situations may be in violation of antitrust laws under certain circumstances. Colleagues may not enter into these agreements without consulting Leadership in advance and obtaining clearance to enter into such agreements.
- Agreements with clients or suppliers regarding the sales or purchases of reciprocal purchases or sales by customers and/or suppliers.
- Agreements with purchasers or lessees of products of BRP which would restrict customers from using or reselling products as they choose to do so.

# INFORMATION TECHNOLOGY POLICIES AND GUIDELINES

## COMPUTER HARDWARE AND EQUIPMENT

All BRP provided workstations, laptop computers, tablets, phones and other technology tools are the legal property of BRP and are provided to colleagues to be used for business purposes. All policies referenced in the Handbook continue to apply including Privacy, Use of Technology and the Internet as well as Use of Equipment. Colleagues must adhere to all of the BRP Security Policies. All laptops/tablets must be locked up or taken home each night.

Please refer to the IT Security Policies – BRP-110 Workstation Security Policy for additional details.

## USE OF TECHNOLOGY AND THE INTERNET

BRP's technical resources—including desktop and portable computer systems, fax machines, Internet and web access, voicemail, electronic mail (e-mail), electronic bulletin boards, and its intranet—enable colleagues to quickly and efficiently access and exchange information throughout the firm and around the world. All such technical resources and communication systems and data are the sole and exclusive property of the firm.

Colleagues have no right of privacy as to any information or file maintained in or on firm property or transmitted or stored through BRP's computer, voicemail, e-mail, network, or telephone systems.

Colleagues should not send e-mail or other communications that either mask your identity or indicate that someone else sent them. Colleagues should never access any technical resources using another colleague's password. Sending, saving, or viewing offensive material is prohibited.

Please refer to the IT Security Policies – BRP – 100 Acceptable Use Policy for additional details.

## HANDLING OF SENSITIVE DATA – PRINTING, STORING AND DISPOSING

All colleagues are responsible for maintaining the confidentiality and security of client information.

- Documents containing Personal Health Information should not be left in open areas, on printers or desks where they can easily be viewed.
- Personally Identifiable Information (PII) or Protected Health Information (PHI) should never be sent via unencrypted e-mail.
- The BRP utilized encryption solution should be used for electronic communications containing PII, PHI, Material Non-Public Information (MNPI) or other sensitive information.
- When documents are mailed, no classification marking should be used to indicate the contents of the envelope and the envelope should be sealed in such a way that tampering would be indicated upon receipt.
- Shred all documents that contain any confidential information. Documents to be shredded should be placed in the appropriate container and should not be left to accumulate in offices.
- Once a document is placed in the shredding containers only the facilities or operations representative should have access to retrieve a document.
- Client payments and all BRP Checks should be secured in a locked drawer and not left on a desktop overnight.

Please refer to the IT Security Policy – BRP – 105 Confidential Data Policy for additional details.

### THINK BEFORE YOU INK

Save documents, websites, photos, and presentations electronically and resist the urge to print unless absolutely necessary. Only print in color when necessary, check your settings and printer selection prior to finalizing the print job.

## USE OF EQUIPMENT

All firm property must be used properly and maintained in good working order. Equipment and supplies provided at work are for business purposes only and may not be borrowed or used for other purposes. Such items remain the property of the firm, even if issued or assigned to an individual colleague and must be returned upon request or termination. Colleagues who lose, steal, or misuse firm property may be personally liable for replacing or fixing the item and may be subject to discipline, up to and including discharge.

BRP may inspect and search any and all of its property to determine whether this policy or any other policy of the firm has been violated, or when an inspection and investigation is necessary to promote safety in the workplace or compliance with state and federal laws.

## BIOMETRIC SECURITY POLICY

As a BRP colleague we want you to be aware that your biometric identifier or biometric information may be collected, disclosed to third parties, and/or stored by BRP. Biometric identifiers include information such as your retina, a fingerprint, voiceprint, or your facial geometry. Biometric information is any information based on a biometric identifier that is used to identify you.

We may collect this information in order to allow you to use biometric security on electronic devices provided by BRP to you as part of your relationship with BRP. Examples include Face-ID or Touch-ID on an Apple device, or Windows-Hello facial recognition on a Microsoft Windows device. These biometric security tools permit users to log into their BRP devices through the use of a biometric identifier.

BRP does not process or store your biometric information or biometric identifiers outside of the specific biometric security solution being used by the BRP electronic device user. BRP will permanently destroy any biometric identifier or biometric information in our possession when it is no longer required for security purposes promptly and as soon as is reasonably practicable, but no later than one year after your last interaction with us.

By signing your "[MY COLLEAGUE HANDBOOK ACKNOWLEDGEMENT FORM](#)", you also agree to and understand that we may store, disclose to third parties, and collect your biometric identifiers and/or biometric information.

# **YOU ARE HERE**

## **COLLEAGUE HANDBOOK**

**SECTION 1: ABOUT BRP**

**SECTION 2: WHAT WE EXPECT FROM YOU (PROMISES FROM COLLEAGUES)**

**SECTION 3: WHAT YOU CAN EXPECT FROM US (PROMISES TO COLLEAGUES)**

**SECTION 4: COMMUNICATION**

**SECTION 5: MY BENEFITS**

**SECTION 6: WORK HOURS, TIME OFF, AND LEAVES OF ABSENCE**

**SECTION 7: ETHICS AND CODE OF CONDUCT**

**SECTION 8: WE CARE ABOUT YOUR SAFETY**

**SECTION 9: GENERAL OPERATING GUIDELINES**

**SECTION 10: STATE ADDENDUMS**

## Section 8: We Care About Your Safety

*A colleague-centric firm putting safety first*

### SAFETY PROCEDURES

BRP is committed to the safety and health of all colleagues and recognizes the need to comply with regulations governing injury and accident prevention and colleague safety. Maintaining a safe work environment, however, requires the continuous cooperation of all colleagues. BRP will maintain safety and health practices consistent with the needs of our industry. If you are ever in doubt about how to safely perform a job, it is your responsibility to ask your Managing Director or Team lead for assistance. Any suspected unsafe conditions and all injuries that occur on the job must be reported immediately. Compliance with these safety rules is considered a condition of employment. Therefore, it is a requirement that each Managing Director or Team lead make the safety of colleagues an integral part of her/his regular management functions. It is the responsibility of each colleague to accept and follow established safety regulations and procedures.

### WEAPON FREE WORKPLACE

To ensure that BRP maintains a workplace safe and free of violence for all colleagues, the firm prohibits the possession or use of dangerous weapons on any firm property, except where permitted by law. This includes anywhere that firm business is conducted, such as partnered firm locations, client locations, trade shows, restaurants, firm event venues, and so forth.

Regardless of whether a colleague possesses a concealed weapons permit or is allowed by law to possess a weapon; weapons are prohibited on any firm property. Weapons include, but are not limited to firearms, knives or swords with blades over four inches in length, explosives, and any chemical whose purpose is to cause bodily harm to another person.

Colleagues who violate this policy will be subject to disciplinary action, up to and including termination of employment.

### REPORTING SAFETY ISSUES

All accidents, injuries, potential safety hazards, safety suggestions, and health and safety related issues must be reported immediately to your leader. If you or another colleague is severely injured, contact outside emergency response agencies. If the injury is not severe, please contact our Risk Mitigation Service Team for assistance on where to obtain medical care. If an injury does not require medical attention, a report of accident form must still be completed if medical treatment is later needed and to ensure that any existing safety hazards are corrected. The colleague's Claim for Workers' Compensation Benefits Form must be always completed in which an injury requiring medical attention has occurred.

The State Workers' Compensation Act may also require that you report any workplace illness or injury, no matter how slight. If you fail to report an injury, you may jeopardize your right to collect workers' compensation payments and health benefits. OSHA also provides for your right to know about any health hazards which might be present on the job. If you have questions or concerns, contact your Managing Director or Team lead for more information.

## SAFETY RULES

BRP wishes to reduce or eliminate accidents in the workplace. For this to succeed, you must take an active role in workplace safety. Conduct yourself in a responsible manner. Use safe work habits and observe the safety rules of the firm and safe practices prescribed in your individual work unit.

- Observe posted restricted areas.
- Wear shoes in the building.
- Do not overload electrical outlets.
- Avoid dropping objects on the floor that may cause others to slip or fall.
- When carrying packages or objects, make sure vision is not blocked.
- Lift objects only within your capacity—bend your knees and keep your back straight and then lift with your leg muscles.
- Exercise care in opening and closing file cabinets and desk drawers and in using sharp instruments.
- Avoid tilting back in chairs.
- Use a stable object, such as a step stool, to reach items beyond your normal reach.
- Be sure that stored objects are firmly supported and cannot fall over.
- Do not stack boxes or paper around electrical outlets.
- When you observe a safety hazard, correct it, if possible; otherwise, report it to your leader, team lead, or Managing Director.

## EMERGENCY CLOSINGS

Occasionally, certain conditions necessitate closing the firm's facilities. Firm leadership will make the determination whether the firm will remain open or close/closed. Colleagues will receive text and/or email notification via the BRP AlertMedia notification system or directly from their leader. Based on your own situation and safety, you may decide to leave the office early or, if working remotely, log off your computer early.

Unless you are informed otherwise, always assume that BRP is open for business during normal hours. If the firm closes an office location, those with the ability to telework are expected to continue to support clients and customers. If you cannot work from home (i.e., no power, mandatory evacuation, etc.) you should notify your manager as soon as possible.

# WORKERS COMPENSATION

## HEALTH AND SAFETY

The health and safety of colleagues and others on BRP property are of critical concern to the firm. We strive to attain the highest possible level of safety in all activities and operations. BRP also intends to comply with all health and safety laws applicable to our business.

BRP must rely upon colleagues to ensure that work areas are kept safe and free of hazardous conditions. Colleagues should be conscientious about workplace safety, including proper operating methods and known dangerous conditions or hazards. Any unsafe conditions or potential hazards should be reported to your Managing Director or Team lead immediately, even if you believe you have corrected the problem. If you suspect a concealed danger is present on BRP premises, or in a product, facility, piece of equipment, process, or business practice for which BRP is responsible, bring it to the attention of your Managing Director, Team lead or CRMG Risk Mitigation Services Team immediately. Managing Directors or Team leads should arrange for the correction of any unsafe condition or concealed danger immediately and should contact the CRMG Risk Mitigation Services Team regarding the problem.

## COLLEAGUE NOTIFICATION

Any workplace injury, accident, or illness must be reported to your leader, team lead, or Managing Director within the hour or, by the end of your shift, regardless of the severity of the injury or accident. If emergency medical attention is required immediately, contact 911 and then your Managing Director or team lead. If non-emergency medical treatment is required, contact your leader, team lead, or Managing Director so they can assist you in obtaining medical care within the approved managed care or medical provider network, after which the details of the injury or accident must be reported. Emergency medical treatment should be immediately sought at the nearest hospital or emergency treatment facility. As necessary, call 911 for ambulance service. Whether medical care is necessary or not, all Workers' Compensation incidents require the colleague to comply with the Drug Free Workplace Post Accident drug testing process.

## REPORTING INJURIES

All injuries at work must be reported to your leader, team lead, or Managing Director (or, in their absence, to the Regional President of your business area) immediately but no later than by the end of your work shift. Questions regarding what should be reported as Workers' Compensation in lieu of Group Health should be directed to either the Human Resources department at [HR@baldwinriskpartners.com](mailto:HR@baldwinriskpartners.com) or the Legal department at [AskLegal@baldwinriskpartners.com](mailto:AskLegal@baldwinriskpartners.com).

Injuries requiring no immediate medical treatment must still be reported to your leader, team lead, or Managing Director for internal documentation if problems develop later.

All injuries will require BRP colleagues to comply with the Drug Free Workplace (DFWP) process. Necessary DFWP forms can be secured from the CRMG Risk Management Team.

# **YOU ARE HERE**

## **COLLEAGUE HANDBOOK**

**SECTION 1: ABOUT BRP**

**SECTION 2: WHAT WE EXPECT FROM YOU (PROMISES FROM COLLEAGUES)**

**SECTION 3: WHAT YOU CAN EXPECT FROM US (PROMISES TO COLLEAGUES)**

**SECTION 4: COMMUNICATION**

**SECTION 5: MY BENEFITS**

**SECTION 6: WORK HOURS, TIME OFF, AND LEAVES OF ABSENCE**

**SECTION 7: ETHICS AND CODE OF CONDUCT**

**SECTION 8: WE CARE ABOUT YOUR SAFETY**

**SECTION 9: GENERAL OPERATING GUIDELINES**

**SECTION 10: STATE ADDENDUMS**

## Section 9: General Operating Guidelines

*Our business basics drive our success*

### FACILITIES INFORMATION

#### GENERAL HOUSEKEEPING

BRP aims to provide safe and suitable working conditions for all colleagues and considers our offices a reflection on our professionalism and culture. Workstations and desks should be left in an orderly condition at the close of the day with all documents appropriately secured; windows, equipment and lights, coffee machines, copy machines, and computers should be turned off at the end of the day. All areas of BRP should be free of litter. We should treat our facility as though it were our home. Report any maintenance issues to the Facilities team at [facilities@baldwinriskpartners.com](mailto:facilities@baldwinriskpartners.com) or the regional firm administrator (RFA) at your location.

#### MEDIA RELEASE AND RECORDING DEVICES IN THE WORKPLACE

BRP does not require or track media release authorizations. If you do not want to participate in video or photo events or be involved in firm media updates, please make the best effort to remove yourself from the situation. If any circumstance requires your personal protection from firm media releases, please contact BRP Human Resources. Any person who does not represent the firm may not photograph, video, or otherwise record any person, document, conversation, communication, or activity that in any way involves the firm or colleagues of the firm, as well as any clients or any other individual with whom the firm is doing business in any capacity (for example, vendors, suppliers, consultants, attorneys, or independent contractors).

#### SECURITY

You are responsible for maintaining the security of your ID badge, keys and passes/pass codes. Do not lend these items to anyone who is not authorized to possess them. Pass codes or passwords should not be shared under any circumstances. Similarly, electronic door codes, and any other security access information should not be disclosed to anyone who is not authorized to have that information.

### LICENSING

#### CONTINUING EDUCATION & LICENSING EXPENSES

##### REQUIRED LICENSES

A colleague will initially incur their own expenses in obtaining their licensing; however, you will be reimbursed by the firm once the state exam is passed. Expenses eligible for reimbursement include the required book and study guide, the

cost of the required course, the cost of one state exam and the cost of finger printing. The firm will not reimburse colleagues for optional crash courses, flash cards, etc.

If you are hired without the proper license, your job offer will indicate when you must complete your state exam. It will be expected that a newly hired colleague will obtain their license within the first 90 days of their start date. Before a position or location change an existing colleague must be appropriately licensed. If you need assistance in covering the cost of reimbursable licensing expenses, please contact your Team lead and they will work with Human Resources to ensure payment.

## OPTIONAL LICENSES

A colleague in good standing may wish to pursue an additional license as part of their professional development plan. If approved, the expense reimbursement will follow the policy outlined under Required Licenses.

## LICENSING EXPENSES

The firm will reimburse licensed colleagues for approved continuing education courses required to maintain licensing up to the amount allowed by the Internal Revenue Service. Reimbursement must be pre-approved by your Managing Director or Team lead and will be provided only for courses passed. Approved education courses will include only those courses that provide required continuing education credit. Additional courses can be requested by and/or approved by your Managing Director or Team lead for areas where improvement is required. The firm will not pay for travel expenses associated with out-of-town continuing education unless those classes are not available in your area and the expense was approved in advance.

To be reimbursed, submit an expense report via the Concur portal with the appropriate supplemental documentation attached such as itemized receipts, a certificate of completion, etc.

## LICENSING NOTIFICATION & COMPLIANCE

BRP endeavors to remind you of your continuing education requirements, however, you are solely responsible for tracking and any fine or penalty is your responsibility. As a courtesy, you will be notified, via email, at 60, 45, and 15 days before the expiration of your compliance period.

Remember, CE's completed after the deadline—even one day late—are subject to all rules and penalties of the Florida Department of Financial Services. Penalty fees and/or fines are not eligible for reimbursement by BRP unless BRP failed to notify you of your compliance period ending as described above. To follow Insurance Regulations, any colleague whose license is out of compliance may conduct no prospect or client meetings and cannot receive commission income until the license becomes compliant again. You have only until the last day of your license period to complete your Continuing Education requirements.

Anyone who has had administrative action taken against them (such as paying a fine for late CE's) will have to disclose this on any documents requesting this information. This includes, but is not limited to:

- carrier appointment applications/renewals
- new license applications/renewals
- non-resident license applications/renewals

Please note if any administration action is mentioned or taken against you, you must let Sarah Smart (sarah.smart@baldwinriskpartners.com) in legal know immediately.

This could cause appointment terminations and/or rejections of license applications/renewals. Please see Human Resources or your Managing Director or Team lead, for more information or if you have questions.

## GENERAL FIRM PRACTICES

### EXPENSE REPORTS

Expense reports should be submitted to your leader via Concur by the last day of the month for reimbursement on the 15th day of the month. Cell phone reimbursements are automatically reimbursed to you through payroll, do not include it in your expense report.

It is important to help manage the predictability of our business, so expense reports for personal expenses that are turned in after 90 days will not be reimbursed by the firm.

The following items are eligible for reimbursement. If you have inquiries outside of these guidelines, please contact your leader or team lead.

- Receipts are required and should be put into Concur. If receipts are not available, credit card statements will be accepted but require a written statement regarding where, when, how much and business purpose.
- There is a per diem of up to \$80.00 for colleague meals when traveling. The breakdown is as follows:
  - Up to \$20.00 for breakfast
  - Up to \$20.00 for lunch
  - Up to \$40.00 for dinner
  - Anything above and beyond will be the colleague's responsibility
- Please see the Mileage Policy for mileage reimbursements.
- If you incur an abnormally high business expense, such as a hotel expense, etc., you may submit an off-cycle expense report with your direct leader or Managing Director's approval.

It's easy to submit your expenses with SAP Concur! It even has a single sign-on! Check out these exciting features:

- Single sign-on: Log into the system without entering a username or password. (<https://www.concursolutions.com/UI/SSO/p0086786ug9x>)
- Mobile capabilities: Book travel and submit/approve expense reports via your device.
- E-receipts: Attach receipt images to a report instead of mailing paper receipts.
- Copy expense: Copy expenses from one line to another.
- Improved interface: Book travel and create expense reports more easily.

If you are looking for additional information about how to navigate Concur, refer to Accounting's SharePoint page. For general questions, e-mail [brpaccounting@baldwinriskpartners.com](mailto:brpaccounting@baldwinriskpartners.com). Your Team Lead or Managing Director will need to review and approve all expenses via Concur.

### MILEAGE REIMBURSEMENT

Mileage will be reimbursed for business related travel for any distance beyond your normal work commute. Personal commuting costs (travel between home and your normal work location) are not reimbursable. When colleagues use their personal vehicle for business purposes, reimbursement for mileage will be calculated at the annual standard IRS mileage rate for trips less than 400 miles. For trips greater than 400 miles; colleagues are responsible for determining if

rental car options are most cost efficient for the firm. When renting a vehicle, collision coverage should be waived. BRP reserves the right to modify the reimbursement rate from time to time. Other expenses must be substantiated by receipts. Documentation of the mileage must be submitted at the time of the reimbursement request. This is accessible through websites (ex. Mapquest, Google Maps) using the “shortest route” option. All colleagues who use their vehicles for business purposes must have current and adequate automobile/liability insurance coverage of at least 100/300/100 or \$300,000 Combined Single Limit. Other expenses such as parking will be reimbursed at the actual costs. Original, itemized receipts must be provided.

## MOBILE COMMUNICATIONS

### CELL PHONES IN THE OFFICE

We respond to all our stakeholders; however, we must retain a professional decorum in the office. Kindly set cell phones to silent/vibrate mode when in our offices. Please do not walk through the office talking on your cell phone or while talking on your headset. Never allow your cell phone to ring or answer a silent ringing cell phone in our clients’ and/or Insurance Company Partners’ offices. This includes their lobbies.

### OFF-HOURS BUSINESS USE OF MOBILE COMMUNICATIONS FOR NON-EXEMPT COLLEAGUES

Non-exempt colleagues, whose personal smartphones are connected to the firm network and/or their BRP Outlook email accounts, should not read or respond to emails outside of their normal working hours.

If a non-exempt colleague is directed to, or otherwise, reads and/or responds to work communications during off hours, they should have prior approval of their leader prior to engaging in such conduct. However, regardless of pre-approval, the colleague must report the time worked in BRP’s time keeping system and notify their Managing Director or Team lead immediately at the beginning of their next shift.

## GENERAL EMPLOYMENT INFORMATION

### EMPLOYMENT RECORDS & PERSONAL INFORMATION

The firm maintains employment documentation on each colleague. These files include such information as the colleague’s job application, resume, records of training, documentation of performance appraisals and salary adjustments, and other pertinent employment records. Employment files are the property of the firm and access to the information they contain is restricted. Colleagues who wish to review their own file should contact their HR Partner to schedule a convenient time to review the file.

In addition, each colleague is responsible for providing accurate and timely updates to their personal information. Workday allows for colleague self-service, and personal information such as name, phone number, address and emergency contact can be updated by each colleague via the Workday portal.

## SEPARATION OF EMPLOYMENT

### NOTICE OF SEPARATION

While BRP hopes that the relationship between you and the firm will be mutually beneficial, either you or the firm may end the relationship at any time (as permitted by law). If you plan to resign, please submit a written resignation stating your intentions and reasons for leaving. While not required, the firm expects and greatly appreciates two weeks' notice to allow management time to find a replacement and to minimize service interruption.

### EXIT INTERVIEWS

At separation, BRP Leadership or Human Resources may request an exit interview to discuss your reasons for leaving and any other impressions that you may have. While not required, your insights would be helpful, and every attempt will be made to keep all information confidential.

### RETURN OF PROPERTY

Any property issued to you, such as computer equipment, keys, BRP credit cards or petty cash accounts are the property of BRP and must be returned at the time of your termination.

### POST-TERMINATION CONTINUATION OF INSURANCE

The Consolidated Omnibus Budget Reconciliation Act of 1985 (COBRA) provides eligible individuals with the option to continue health insurance coverage under the firm's policy, at their own expense and for a certain period, upon the termination of employment as well as in other circumstances. For more information, please contact Human Resources.

## CLOSING STATEMENT

BRP thanks you for taking the time to thoroughly read this Handbook.

We expect everyone to abide and follow the policies as set forth and described. However, all colleagues are encouraged to bring forward their suggestions and ideas about how BRP can be made a better place to work, our jobs improved, and our services to our clients enhanced. When you see an opportunity for improvement, please talk it over with your leader. All suggestions are valued and appreciated!

# **YOU ARE HERE**

## **COLLEAGUE HANDBOOK**

**SECTION 1: ABOUT BRP**

**SECTION 2: WHAT WE EXPECT FROM YOU (PROMISES FROM COLLEAGUES)**

**SECTION 3: WHAT YOU CAN EXPECT FROM US (PROMISES TO COLLEAGUES)**

**SECTION 4: COMMUNICATION**

**SECTION 5: MY BENEFITS**

**SECTION 6: WORK HOURS, TIME OFF, AND LEAVES OF ABSENCE**

**SECTION 7: ETHICS AND CODE OF CONDUCT**

**SECTION 8: WE CARE ABOUT YOUR SAFETY**

**SECTION 9: GENERAL OPERATING GUIDELINES**

**SECTION 10: STATE ADDENDUMS**

# STATE ADDENDUMS

## COLLEAGUE HANDBOOK

Arizona

California

Georgia

Illinois

Maryland

Massachusetts

New Hampshire

New Jersey

New Mexico

New York

North Carolina

Tennessee

Texas

Virginia

Washington