



SP+ EMPLOYEE HANDBOOK

200 E. Randolph Street Suite 7700
Chicago, IL 60601

FOR INTERNAL USE ONLY

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PREFACE

Purpose

All employees are expected to read and be familiar with the information contained in the Employee Handbook. It has been developed for your personal use to answer some of the most frequently asked questions about employment with **SP+**. A thorough understanding of your responsibilities, duties, and your employee benefits, is necessary to be an effective employee.

You should retain this Handbook as a reference. Information in this Handbook covering Company policies and benefits is, of necessity, in condensed form. It is not intended to cover all the conditions of your employment nor all workplace guidelines, most of which are provided at the state, city or local level. This Handbook provides general information pertaining to **SP+**'s policy. The information contained herein supersedes all previously-dated Handbooks for any of the **SP+** companies (with the exception of SP+ Corporation Canada). You are solely responsible for ensuring that you have the most up-to-date Handbook.

If, after reading the Handbook, you have any questions or need further clarification of any of the rules or policies discussed in this Handbook, please contact your manager or the Human Resources Department via the **SP+** Hotline (800-245-4714) or via the internet at reportlineweb.com/spplus. Further, certain locations may have adopted additional or different rules, policies, practices or procedures than those provided herein. To find out if your location has adopted any additional or different rules, policies, practices or procedures, ask your location manager or the Human Resources Department. To the extent that there is any conflict between the Handbook and a collective bargaining agreement, please defer to the collective bargaining agreement.

THE RELATIONSHIP BETWEEN YOU AND THE COMPANY IS REFERRED TO AS "EMPLOYMENT AT WILL." NO PROVISION OR PORTION OF THIS HANDBOOK CONSTITUTES AN IMPLIED OR EXPRESS CONTRACT, GUARANTEE OR ASSURANCE OF EMPLOYMENT OR ANY RIGHT TO ANY EMPLOYMENT-RELATED BENEFITS OR PROCEDURES. EITHER THE EMPLOYEE OR THE COMPANY MAY TERMINATE AN EMPLOYEE'S EMPLOYMENT WITH THE COMPANY AT ANY TIME, FOR ANY REASON, WITH OR WITHOUT NOTICE. ANY STATEMENTS OR PROMISES TO THE CONTRARY, WHETHER ORAL OR WRITTEN, ARE HEREBY INVALID AND SHOULD NOT BE RELIED UPON BY PROSPECTIVE OR EXISTING EMPLOYEES. THE COMPANY RESERVES THE RIGHT TO CHANGE ANY POLICIES OR PROCEDURES OUTLINED IN THE HANDBOOK AT ITS DISCRETION.

To the extent that there is any conflict between federal, state or local laws and the policies and procedures in this Handbook, such laws will apply.

Certain job classifications are not provided with a Company email account. Access to the online training platform, **SP+ University**, and other electronic forums can be obtained by providing an email address during the on-boarding process.

ABOUT THE COMPANY

SP+ is a diverse provider of professional parking, ground transportation, facility maintenance, security and event logistics services to real estate owners and managers in a wide array of markets. We are operations specialists who link innovation with exceptional market-based expertise in each of our service lines. With nine distinct operating divisions – each focusing exclusively on a single market – we are experts at understanding the specific needs and idiosyncrasies of those markets, and have the depth of experienced personnel and financial resources to satisfy them.

BAGS is one company among several companies and affiliates. Depending on your region of the country or the service you provide, you may be working for our hospitality company, our airport services company, or our delivery company. We park cars, offer bell stand services, deliver delayed and VIP luggage, assist passengers in wheelchairs, provide skycap services, and we conduct passenger check-in to an airline from a remote location. We service the airlines, hotels, convention centers, cruise ship ports and companies who need assistance with travel or delivery logistics for their organization. All these services but with a single vision to Make Travel Easier.

USA Parking provides clients with innovative, proactive and responsible methods of operational management. The Company's specialty is the management of high end, service intensive parking facilities and transportation related services. Our customers include Resorts, Office and Mixed-Use projects, Retail/Entertainment oriented projects and Airport related facilities.

Our ability to deliver a portfolio of services as a single provider simplifies the administrative burden on our clients while enabling them to leverage the economic benefits associated with a single relationship. Our clients have only one reporting relationship to manage, and we are able to more effectively and efficiently deliver a range of services than typically possible through multiple providers.

Our organization's cultural underpinning is a commitment to put Innovation In Operation™. That means we are constantly challenging ourselves to use our tools and cultural attributes - **innovation + creativity + excellence + integrity + initiative + knowledge + technology + experience + efficiency** - to develop new and better ways of doing things in order to improve the effectiveness and efficiency of everything we do. That is our promise, both to ourselves and to you.

Multiple services + market expertise + cultural commitment, delivered by 18,000+ dedicated employees. That's what **SP+** is all about. So know that when SP+ is mentioned below, the Company means all brands under the SP+ umbrella. We are all one dedicated company working towards providing the most efficient, highest standard services possible.

Corporate Compliance Courses and Policies

All new employees are required to complete the following courses as part of their on-boarding process. These courses are available through our online training forum, **SP+ University**. Check with your manager if you have questions regarding this process.

Courses to be Completed Within the First Two Weeks of Employment

- Code of Business Conduct
- Information Security Awareness
- Sexual Harassment Prevention
- Leading the Way: Environmental Compliance and Protection
- First Observer
- Introduction to Safety
- Bloodborne Pathogens
- Hazard Communication

Courses to be Completed Within the First 30 to 60 Days of Employment

- Non-Harassment and Diversity*
- Robbery Procedures *
- Heat Illness*
- Motor Vehicle Safety**

- * Within first 30 days of employment
- **Within the first 60 days of employment

Enforcement: To enforce the Code of Business Conduct and other compliance policies, and protect against theft or fraud, the Company has implemented a rigorous audit program. The Company actively monitors work activities and reserves the right to use surveillance. Anyone violating the Code of Business Conduct, or committing theft or fraud, is subject to disciplinary action including dismissal and, under the appropriate circumstances, criminal prosecution.

Reporting Violations: Should you become aware of violations, or just have a need to discuss work issues, the Company has several communication programs you are encouraged to use. These include the Open Communication Policy, the Complaint Procedure and **SP+** Hotline at 1-800-245-4714 or via the internet at reportlineweb.com/spplus. You can report concerns without fear of retaliation.

GENERAL EMPLOYMENT INFORMATION

Alcohol and Drugs

Illegal drug use and alcohol misuse by employees threaten health and safety, harm productivity, and are contrary to the policies and expectations of the Company and its clients. The goals of the Company's policy on alcohol and drugs - which applies to all employees - are to (i) enhance safety and productivity, and (ii) outline the circumstances in which employees are subject to testing or discipline for violating the Company's drug-alcohol rules.

You must report to work fit for duty and not under the influence of drugs or alcohol. At all times you are working, operating Company or customer vehicles or equipment, or present on the Company premises, you are prohibited from:

- violating a client's drug-alcohol rules applicable to the facility at which you are working,
- being under the influence of alcohol or illegal drugs or otherwise unfit to work safely,
- using, possessing, selling, distributing, buying or dispensing illegal drugs (whether illegal due to federal, state or local law), or
- consuming or possessing alcohol.

This policy does not prohibit the lawful use and possession of prescribed medications. You must, however, consult with your doctor about the medication's effect on your ability to work safely, and you must promptly disclose any restrictions to your manager/supervisor. You are not required to (and should not) disclose underlying medical conditions.

Compliance with these rules is a condition of employment, and employees reasonably suspected of violating these rules are subject to discipline or termination, depending on the circumstances. Employees also may be required to take and pass drug and alcohol tests when required by the Company's clients or the Company, including but not limited to when suspected of violating the Company's and/or client's drug and alcohol rules. The refusal to submit to any alcohol or drug test may result in an immediate termination.

The Company reserves the right to inspect all parts and aspects of its premises for illegal drugs or alcohol. All employees and visitors may be asked to cooperate in inspections of their persons, work areas and property that might conceal illegal drugs or alcohol. If you refuse to cooperate in inspections you will be subject to appropriate disciplinary action up to and including termination.

Commitment to Diversity and Equal Employment Opportunity

SP+ is an equal opportunity employer and does not discriminate against any individual in hiring, employment, or advancement because of race, color, national origin, gender, sexual orientation, religion, age, disability, veteran status, or any other legally protected status as defined by applicable laws. Employment opportunities at the Company are based on non-discriminatory factors.

Discrimination and Harassment

It has been and continues to be **SP+**'s policy to (i) provide employees with a work environment free from discrimination and harassment, and (ii) prohibit discrimination and harassment of employees or customers in the workplace by any person, in any form. Discrimination and harassment can take many forms and can be based on a number of factors including a person's race, color, national origin, gender, sexual orientation, religion, age, disability, veteran status, or any other legally protected status as defined by applicable laws. Discrimination and harassment can include offensive remarks, slurs or other verbal, written or inappropriate physical behavior based on a protected classification, such as the factors listed directly above.

SP+ has a zero-tolerance policy for any type of discrimination or harassment. Complaints of harassment or discrimination will be taken seriously and will be handled in a confidential manner to the extent possible. Disciplinary action up to and including termination will be taken against persons who engage in harassment or discrimination or who retaliate against persons who either make good faith complaints of harassment or discrimination or who provide information related to complaints of harassment or discrimination.

SP+ employees are responsible to help assure that harassment and discrimination are avoided throughout the Company. Additionally, each manager and supervisor has an affirmative duty to maintain a workplace free from discrimination and harassment. All Employees must complete the Sexual Harassment Prevention training made available at **SP+ University** on their first day of employment with the Company.

If you believe that you have experienced or witnessed discrimination or harassment, you are to report the matter immediately through the **SP+** Hotline (800-245-4714), via the internet at reportlineweb.com/spplus or to your manager/supervisor. If that is not appropriate under the circumstances, then you are to report conduct to the next level of management, any officer of the Company or any other member of Company management whom you feel comfortable contacting. You are expected to inform any person in the workplace whose conduct you find unwelcome or offensive. If you are not comfortable telling that person directly, then you are expected to use one of the avenues identified directly above.

Once a complaint has been reported, an investigation will be conducted. Employees making complaints of harassment or discrimination in good faith, or who provide information related to such complaints in good faith, will be protected against retaliation. Filing knowingly false complaints or providing knowingly false information as part of an investigation will be grounds for disciplinary action, up to and including termination.

Americans with Disabilities Act

SP+ strongly supports the policies of the Americans with Disabilities Act (ADA) and is committed to treating all applicants and employees with disabilities in accordance with the requirements of the statute. The Company seeks to give full and equal employment opportunities to all persons capable of performing successfully in the Company's available positions. Where appropriate and possible, the Company will make reasonable accommodations for the disability of an employee or applicant. If you require an accommodation, please notify your manager or contact Human Resources directly.

Nepotism Policy

The information in this handbook is only an overview of the Nepotism Policy. The full Nepotism Policy can be located in the Employee Relations' section of the Company's SPin website (<http://spin.spplus.com>) or the Company's Intranet website (<http://spin.flashspot.com/login.asp>) which can be accessed through **SP+ University** (<http://spplusuniversity.com>). This policy may change from time to time and it is your responsibility to stay informed of any such changes.

Relatives of current employees generally will be considered for employment (as with all applicants) on the basis of their qualifications. However, family or close personal ties between employees, particularly those working in the same department, have the potential to create conflicts of interest or the appearance of favoritism, and these lead to morale problems or spill-over conflicts in the workplace. For these reasons, the Company will not consider or accept such applications for employment where the hiring or employment of an employee's relative, spouse, significant other or friend(s) would result in the types of **prohibited employment relationships** identified in the Nepotism Policy.

This Nepotism Policy applies to the relatives of:

- all employees
- landlords
- clients
- competitors
- appointed or elected public officials.

"Relative" is defined as: spouses, children, foster children, parents, step relatives, in-laws, grandparents, siblings, aunts, uncles, nieces, nephews, cousins, or any individual with whom an employee has a close personal relationship, such as a domestic partner, co-habitant (including those individuals not related but sharing a common living facility) or significant other.

This policy applies to hiring and employment decisions affecting all full-time and part-time (including temporary and seasonal) positions, as well as positions for our special event venues. These restrictions also apply when assigning, transferring or promoting an employee. The policy also applies to existing employees who are not related at the time of their original employment but who subsequently marry, establish a close personal relationship, or, through marriage create "in-law" relationships.

Any exception to the Nepotism Policy must be approved in writing through the President or Chief Executive of the respective area impacted. Final approval of any exceptions will reside with **SP+'s** CEO.

Relatives of Public Officials or Clients: Under no circumstances may the relatives of public officials be hired unless permitted by applicable law. The hiring of relatives of clients is discouraged because of the risk of negative perceptions relating to potential special treatment that such employees could receive. Accordingly, in the case of the proposed hiring of a relative of either a public official or a client, the written approval of **SP+'s** Chief Legal Officer must be obtained before any such proposed hiring occurs.

Violation of the Nepotism Policy will be grounds for disciplinary action, up to and including termination.

Workplace Dating Policy

Romantic relationships of any kind between a supervisor/manager and a subordinate are prohibited. If an employee is promoted and the promotion creates a prohibited relationship, such as a supervisor in a romantic relationship with a subordinate, both employees must immediately notify Human Resources. Should there be any questions about a potential issue, you should immediately notify Human Resources. Violations of this policy can lead to disciplinary action up to and including termination.

Your Manager/Supervisor

Every employee has a direct supervisor to whom they report. Your supervisor's primary duty is to get the job done, while ensuring that those under their supervision are treated fairly. If you have any questions about the job, do not hesitate to ask your supervisor.

Reporting Unfair, Illegal or Unethical Behavior

Employees are encouraged to talk to supervisors, managers or other appropriate personnel about unfair treatment, illegal or unethical behavior. Employees are expected to cooperate in internal investigations of misconduct.

Employees may forward concerns regarding accounting, internal accounting controls, auditing matters, violations of the Company's Code of Business Conduct, or violations of the Company's Equal Employment Opportunity, Anti-Discrimination or Non-Harassment policies on a confidential or anonymous basis through the **SP+** Hotline (800-245-4714) or via the internet at reportlineweb.com/spplus. Any allegations of violations of these policies will be promptly and thoroughly investigated and, if warranted, appropriate disciplinary action will be taken, up to and including termination. The Company forbids retaliation against anyone for making a good faith report of a perceived violation, assisting in making a complaint, or cooperating in an investigation of a complaint.

The Company will not terminate, demote, suspend, threaten, harass or in any manner discriminate against any employee in the terms and conditions of employment based upon any lawful actions of such employee with respect to good faith reporting of complaints.

SP+ will take corrective action as is appropriate based upon the nature of the complaint and the outcome of the investigation. Any agent or employee who is found to have violated this policy or otherwise engaged in inappropriate conduct will be subject to disciplinary action up to and including termination.

Employment Records

The Company maintains an electronic personnel file for every employee. Your application for employment, government forms, and other materials pertaining to your employment are maintained and secured in your confidential personnel file. It is very important that your records be kept accurate and up-to-date. You should report any change in status to your manager in writing. The information will be sent the Chicago Support Office to update your file. Be sure to report any change in:

- Your name, address or telephone number;
- Your marital status or the number of dependents;
- A change in INS status;
- Any additional education or training received since submitting original application;
- A change in driving privileges or status of driver's license if applicable to your job.

Name changes must be verified by a new social security card showing your name. Failure to notify the Company of these changes could result in incorrect pay, income tax deductions or other unforeseen problems. Failure to report a change in status may also result in discipline.

Safety

The Company is committed to maintaining safe and healthy working conditions. It is your responsibility to do your part to help us achieve this goal. Because safety is everyone's job, each employee is expected to take all safety and health policies seriously and help enforce these policies within the workplace. The safety responsibilities of all employees include, but are not limited to, the following:

- Approach your job from the viewpoint of SAFETY - don't take risks.
- Come to work well-rested and alert.
- Eliminate fire and other hazards by practicing good housekeeping.
- Never block fire exits, extinguishers, fire alarm boxes, aisle ways, switches or power panels.
- Familiarize yourself with the location of the nearest outside exit from your work area.
- Wear proper safety equipment as required by job duties.
- Follow all safety instructions and policies relating to the performance of your job duties.
- Do not operate any machines, mechanical equipment, etc. unless you have been properly authorized to do so.
- Turn off all machinery when unattended or not in use, and when making repairs or cleaning it.
- Do not perform any task that calls for more than one person until the required number of persons are present.
- Bring to management's attention immediately any unsafe conditions or behaviors that you may notice.
- Report all accidents or injuries to management immediately.

In response to the worldwide health challenges we continue to face, the company is committed to providing a safe working environment, therefore to ensure the health and safety of all employees, you must stay home if you are sick. Please notify your supervisor regarding your illness as required in our attendance policy.

Please note that many of the Company's safety courses on **SP+ University** must be completed on the first day of employment. It is your responsibility to complete all required **SP+ University** programs in a timely fashion.

Hazardous Conditions: It is the obligation of every employee to immediately report any hazardous condition to their supervisor.

Violations of Company safety rules or policies will result in disciplinary action, up to and including termination.

Workers' Compensation/Injury While on Duty

In accordance with state law, you will be paid benefits (lost salary and medical expenses) if you become legitimately ill or injured as a result of a work-related accident. The amount and duration of these benefits are specified by law based upon the nature and circumstances of your illness or injury.

Should you have an accident, become ill or injured on the job, you must immediately take the following two steps:

1. seek immediate first aid or emergency care, and
2. notify your manager/supervisor

Failure to timely report any accident, illness or injury may affect your eligibility for benefits.

Employees who file fraudulent claims for workers' compensation will be subject to discipline up to and including immediate termination, and may be subject to criminal prosecution.

Driving Safety

When operating another person's vehicle, you must use extreme care. Failure to follow driving safety rules and regulations are subject to disciplinary action up to and including termination.

- Do a pre-park vehicle damage inspection before parking the vehicle.
- Be very careful at all turns and intersections.
- Always drive straight in and out of parking spaces and keep the wheels straight.
- When possible, back in the vehicle to park it.
- Be cautious when pulling in and out of spaces.
- Always perform a 3-point parking procedure when parking a vehicle.
- Strictly follow the speed limit and all other traffic laws.
- All vehicles must be locked and secured when parked.
- If at any time you are having a problem with a vehicle, stop and notify a supervisor immediately.
- Always be sure to alert the guest of any valuables in the car and have them secured.
- Always be sure to have guest's put their convertible top up themselves.

If an employee damages or loses any property belonging to the Company, client or a customer as a result of negligence or willful abuse, the employee may be required to pay the resultant cost and may be subject to discipline up to and including termination.

Employees must report all incidents/accidents to the supervisor. Failure to immediately report auto damage is cause for immediate termination. Auto damage caused by speeding, negligence, or reckless driving is also reason for immediate termination.

Company Property

During the course of your job, you may be required to work with Company equipment. To avoid damage, caution and care must be used at all times.

Willful waste, destruction or theft of Company property will result in disciplinary action, including termination or criminal prosecution when warranted. No Company property is to be removed from Company premises without the approval of your manager. All intellectual property originated or developed by employees and all programs and documentation generated by, or provided by, employees for the benefit of the Company are the property of the Company. The Company also asserts the legal ownership of the contents of all information systems under its control and reserves the right to access and use this information at its discretion.

Use of Equipment and Vehicles

Employees are prohibited from taking vehicles, other than their own vehicle, off the location property for personal use. Moreover, no one within the Company has permission to authorize off-property use of vehicles for personal reasons.

Any employee who violates this provision will be terminated. In addition, the employee will be held personally responsible for any damage that occurs to the vehicle and the employee will be referred to local law enforcement agencies for prosecution when appropriate. Finally, the employee will be required to reimburse the Company for any and all legal fees, expenses and costs, as well as any other damages which the Company may incur as a result of the employee's violation of this policy.

Employee's, Friends' and Relatives' Vehicles

Certain locations may allow employees to park their cars on Company or client property. Your manager/supervisor will advise you if applicable. If you are permitted to park your car on site, it must be parked in the assigned garage or lot only during working hours. However, you are not permitted to park on Company or client property when off duty. Additionally, you are not to work on your car or wash it on Company or client property at any time.

Friends and relatives are not permitted to park free at any time. Vehicles used for the sole purpose of dropping employees off are not permitted in the parking lots or garages.

Violation of this policy may result in discipline. Allowing free parking to anyone without permission is grounds for discipline, up to and including termination.

Problem Resolution

The Company recognizes that mistakes may be made in spite of our best efforts. We want to correct such mistakes as soon as they happen. The only way we can do this is to know of your problems and complaints. You are strictly prohibited from going to the client's human resources department or utilizing the client's management team. If an employee chooses to violate this policy, he may be subjected to disciplinary action, up to and including termination.

If you have a problem or complaint, this is what you should do:

Step 1 -Tell your immediate supervisor. During this discussion, feel free to share your honest feelings and concerns. Generally, you and your supervisor will be able to resolve the issue. If not, see your supervisor's direct reporting manager.

Step 2 -If you are not satisfied with the decision rendered by your local managers, you may always talk to your Human Resources Department. Employees or supervisors can contact the Company's Human Resource Department by calling the **SP+** Hotline (800-245-4714) or via the internet at reportlineweb.com/spplus.

Open Communication Policy

The Company believes in direct and open communication at all levels of the Company. Through effective and open dialogue, employee concerns can be identified and resolved. If you have a concern or problem that needs to be addressed do not keep it to yourself. You are encouraged to discuss it with your manager. If you are not satisfied with your supervisor's response, you may communicate directly with a representative from the Chicago or Nashville Support Office or a regional Human Resources representative. You may also call the toll free **SP+** Hotline (800-245-4714) or via the internet at reportlineweb.com/spplus.

Workplace Violence

SP+ has a strong commitment to its employees to provide a safe and secure work environment. The presence of weapons and the occurrence or threat of violence in the workplace is inconsistent with these objectives and will not be tolerated.

Employees, in all states, are strictly prohibited from entering the work site with a weapon. The Company has the right to search for weapons in any areas on Company premises including, but not limited to, cashier booths, lockers, furniture, containers, file cabinets, drawers, equipment or other facilities, lunch boxes, briefcases, personal bags, personal toolboxes or tool kits, parking lots, and Company vehicles.

SP+ specifically prohibits the following and will discipline employees, up to and including termination, for any of the following:

1. Use, possession or sale of any weapon on the work site or while conducting Company business
2. Storing any weapon on the work site or any Company or client premises
3. Illegal possession, use or sale of a weapon off Company property that adversely affects their own or others' safety at work, or indicates a propensity of the same
4. Refusing to submit to an inspection for the presence of a weapon
5. Conviction, guilty plea or "no contest" plea under any criminal statute for the illegal possession of a weapon or for committing a violent act against the person or property of another
6. Refusing to participate in an investigation pertaining to allegations or suspicion that violence has or may occur, or an investigation pertaining to the possession of a weapon by the employee or a co-worker
7. Verbal threats, physical threats, or threatening gestures
8. Fighting, assault or battery in the workplace or in the course of performing one's job duties

The Company prohibits employees from possessing any weapon in the workplace. State law will vary regarding "parking lot" gun rights. This policy is not intended to interfere with state laws regarding parking lot gun rights. In most instances, the Company is following the Weapons policy of its partners.

The Company, in its discretion, may from time to time modify this policy. Any employee's consent to submit to a search is required as a condition of employment, and the employee's refusal to consent will result in disciplinary action, up to and including termination.

Standard of Appearance

Next to pleasant, courteous and prompt service, the most important business-builder is the neatness of both our employees and facilities. Take pride in yourself and where you work.

If you have been provided with a uniform, you are expected to wear the complete uniform at all times while working, with the shirt buttons buttoned and ties properly in place. T-shirts with emblems or any visible printing should not be worn under your uniform. The only hats to be worn on duty are those that the Company provides. Your hair should be clean, combed and well-maintained in a businesslike style. Male employees are permitted to wear neat, well-trimmed beards, mustaches and/or sideburns. Employees working in garage facilities must wear identification badges at all times while on duty; badges shall be visible on the outermost garment at chest level.

If you fail to comply with this policy, you can be prohibited from working. Violations of this policy may also result in disciplinary action.

Any and all appearance or grooming policies listed above may be supplemented or modified with the express approval of the Company.

If you work at a regional or support office, business appropriate attire is required.

Requests for religious or medical accommodations that may alter this policy must be submitted with proper documentation to the supervisor for review and approval.

Hygiene Standards: Good personal hygiene levels are required of all employees regardless of your position. Employees are expected to be neat and well-groomed. Your fellow employees as well as the customers, have a right to expect general cleanliness from you, as you do from them. Each employee is expected to bathe or shower daily and use an appropriate deodorant. An excessive amount of perfume or cologne is offensive to most people; so please use discretion.

Smoking, Smokeless Tobacco and Chewing Gum

SP+ provides a smoke, vapor/electronic cigarette and tobacco free work environment for its employees. Smoking, vaporizer products and smokeless tobacco (*i.e.* chewing tobacco, dipping tobacco, *etc.*) will not be permitted in any closed space, regardless of location, except in specifically designated smoking areas. Employees should not smoke, use vaporizer products or use smokeless tobacco near exits and entrances of buildings. Employees also should not smoke, use vaporizer products or use smokeless tobacco in guest cars or before operating a guest car. Employees are also expected to comply with all client policies and state or local laws regarding smoking. Employees who violate this provision will be subjected to disciplinary action up to and including termination of employment.

Employees are also prohibited from chewing gum in a customer, client or Company automobile.

Workplace Monitoring and Inspections

SP+ reserves the right to conduct workplace monitoring to ensure:

- Employee safety
- Security
- Quality control
- Proper customer service
- A workplace free of misconduct or harassment

SP+ will conduct workplace monitoring in an ethical and respectful manner, guaranteeing the privacy rights of all employees. Employees' belongings and packages entering and leaving the workplace may be subject to inspection by management or security. In addition, the Company reserves the right to inspect all lockers.

- You must have a written authorization to remove any customer, client, or Company items from the location.
- Security and/or management may conduct inspections of any package, purse, briefcase, personal clothing pockets or personal vehicles parked on property or any other personal containers.
- Item inspections may be conducted on an "at all times" basis or on a random schedule.
- The removal of any unauthorized items from the location's premises is cause for suspension pending investigation with a recommendation for termination.

- You should not bring personal items of significant value into the workplace. The Company is not responsible for any personal items.

Media Relations and Inquiries Policy

Events occasionally occur in which a member of the press might approach employees to ask questions, either about a specific Company event or the Company in general. It is important that employees know and abide by the Company's policy on how to respond in those situations. It is imperative – especially since **SP+** is a public company – that all communications with the media regarding the Company are conducted (or otherwise directed) by our media liaison and spokesperson. This will ensure that the Company speaks consistently and with “one voice” on matters involving public comment or disclosure.

This Media Relations and Inquiries Policy applies to all Company employees. Strict compliance with this Policy is essential, and failure to do so may lead to disciplinary action up to and including termination.

The Policy: Employees are not to discuss any Company-related matter with any media representative. This applies regardless of whether the representative assures you that your comments will be “off-the-record” or merely for “background.”

The Communications Director serves as our media liaison and Company spokesperson (as detailed below). In the Communications Director's absence, media calls should be directed to our Chief Legal Officer (as detailed below). Unless otherwise delegated, the Communications Director or Chief Legal Officer are the only people authorized to respond to media inquiries about the Company. Accordingly, if a reporter approaches you to initiate a dialogue or ask you questions regarding the Company, please do the following:

1. Maintain a pleasant demeanor at all times.
2. Do not answer the reporter's questions under any circumstances.
3. Politely tell the reporter, “Our Company policy is to direct all media inquiries to our Company spokesperson, so I cannot answer your question directly. Please let me have your contact information and I'll have our Company spokesperson get right back to you.”
4. Get the reporter's name, phone number and media outlet name.
5. Immediately call the Communications Director at 312-274-2102 (direct). If you are unable to reach the Communications Director, (i) leave a voice message that explains the situation clearly and provide the reporter's contact information, and (ii) if you have access to the internet, send an email to csocommunications@spplus.com that provides the same information.
6. If the Communications Director is unavailable and you left a message, but you believe the situation is important enough that you speak with somebody at the Chicago Support Office immediately, contact our Chief Legal Officer, at 312-274-2194 (direct) or via email to wblanchard@spplus.com. If you are uncertain whether the situation is important enough to contact the Chief Legal Officer, assume that it is and call her.
7. If the reporter prefers not to wait for a spokesperson response and instead presses you for a way that he or she can contact the Company directly, provide the reporter with the Communicators Director's number, 312-274-2102.

Any questions or concerns about this Policy can be directed csocommunications@spplus.com.

Please Note: The employees in the Communications Director and Chief Legal Officer positions may change over time, but the order of positions to contact in the face of a media inquiry shall remain the same. It is your obligation to stay informed of the personnel staffed in each of these respective positions.

Driver's License

If you drive any motorized equipment or vehicle as part of your job duties (even on an occasional basis), you must have a valid driver's license. You are responsible for:

- Checking your license periodically to be sure it has not expired
- Having your driver's license in your possession every day (proof of your licensed status will be required on a regular basis)
- Notifying the Company of any changes to your license (e.g., name, change in license state or number)
- Reporting any suspension or revocation of your license to your manager immediately

Some drivers may also be required to abide by federal or state Department of Transportation regulations and requirements, which may include maintaining a valid commercial driver's license (CDL).

Employees who violate this provision will be subjected to disciplinary action up to and including termination of employment.

There may be times when ongoing background and/or Motor Vehicle Record checks are required of current employees. When requested, you must complete any authorization form. Failure to timely complete an authorization may result in termination of Company's consideration of your application and/or your position with the Company. Falsification or omission of information may result in denial of employment or for those already with the Company, corrective counseling, up to and including discharge.

Definition of Confidential Information

Confidential Information includes, but is not limited to, all information belonging to the Company and not generally known ideas, information, knowledge, data and discoveries, that are not generally known in the trade or industry and about which the Employee has knowledge as a result of this Agreement with the Company, including without limitation, the identity of any of the Company's customers (past, current, and prospective), lists of customers, data provided by or about such customers, customer service information and materials, all information about existing or future contracts with such customers, all information about the products, techniques and services provided by the Company to such customers, all marketing and development plans, contracts, technology, processes, business strategy, forecasts and forecast assumptions and volumes, price and cost objectives, price lists, rates, pricing and quoting policies and procedures, the profit margins and financial information about the Company, marketing strategy and other matters involved in the Company's day-to-day operations, and any and all information or materials in the Company's possession or under its control from any other person or entity which the Company is obligated to treat as confidential or proprietary.

Protocols for Maintaining Confidentiality

The Company limits disclosure of its Confidential Information to:

- Employees with a need to know in order to perform their jobs.
- Third parties requiring the information for a legitimate business purpose, including:
 - prospective suppliers, vendors, and customers; and
 - Individuals and companies contemplating a joint venture or other business relationship with the Company.

Employees must treat all Confidential Information as strictly confidential both during employment and after employment with the Company ends. To maintain the confidentiality of Company's Confidential Information, all employees must follow these protocols, except as otherwise provided in this policy or the separate Non-Disclosure Agreement signed by you when you were hired:

- Employees should not access or use any Confidential Information to which the Company has not provided the employee access or authorization to use.
- Employees should not directly or indirectly disclose, publish, communicate, or make available Confidential Information to any entity or person that does not have a need or the authority to know and use the Confidential Information, except as required for the employee to perform authorized job duties or otherwise permitted by this policy.
- If an employee's authorized job duties require sharing Confidential Information with a third party, the employee must not do so until the Company and the third party enter into a confidential confidentiality agreement and the employee receives advance consent in writing from the employee's supervisor, or the Legal Department.
- Employees may not remove Confidential Information from the workplace/the Company's premises unless specifically approved in writing by the employee's supervisor.
- Employees should not discuss Confidential Information in public where it may be overheard, including elevators, restaurants, cabs, and public transportation.
- Employees may not destroy Confidential Information of the Company through intentional email deletion during employment or post-employment.
- In the event of an inadvertent disclosure of Confidential Information, employees must immediately inform their supervisor so that measures can be taken to minimize damage to the Company.
- Departing employees must return any Confidential Information in the employee's possession to the Company on termination of employment with the Company and will be required to sign an acknowledgment of the same.

This policy is not intended to restrict employees' communications or actions that are protected or required by state or federal law, including discussing terms and conditions of employment/exercising protected rights under Section 7 of the National Labor Relations Act, or otherwise disclosing information as permitted or required by law. This policy does not prohibit or restrict any employee from initiating communications with, responding to any inquiry from, or providing testimony before the Securities and Exchange Commission (SEC), the Financial Industry Regulatory Authority (FINRA), any other self-regulatory organization, or any other state or federal regulatory authority regarding a possible securities law violation.

Any employee who is unsure whether information should be kept confidential should always check with the employee's supervisor or the Legal Department before disclosing the information or taking any other action.

All employees are required to comply with the terms of this policy. Any employee who violates this policy may be subject to disciplinary action, up to and including termination of employment.

Disclosure of Trade Secrets Under the Defend Trade Secrets Act of 2016

Notwithstanding any other provision of this policy:

- As provided for by the Economic Espionage Act of 1996, as amended by the Defend Trade Secrets Act of 2016, an employee will not be held criminally or civilly liable under any federal or state trade secret law for any disclosure of a trade secret that is made:

- in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney, and solely for the purpose of reporting or investigating a suspected violation of law; or
- in a complaint or other document that is filed under seal in a lawsuit or other proceeding.
- If an employee files a lawsuit for retaliation by the Company for reporting a suspected violation of law, the employee may disclose the Company's trade secrets to the employee's attorney and use the trade secret information in the court proceeding if the employee:
 - files any document containing the trade secret under seal; and
 - does not disclose the trade secret, except pursuant to court order.

Disclaimer of Restrictions on Employees' Rights Under the National Labor Relations Act

This policy is not intended to restrict communications or actions protected or required by state or federal law.

Confidentiality Agreements

Employees who have regular access to Confidential Information may be required to sign an Employee Non-Disclosure Agreement (NDA) as a condition of employment or continuing employment. In the event there is any inconsistency between this policy and an employee's NDA, the terms of the NDA shall govern.

The Company also requires all third parties, including independent contractors, to sign a confidentiality agreement before receiving any of the Company's Confidential Information. Employees must help ensure the protection of the Company's Confidential Information by abiding by this requirement when communicating or sharing information with a third party with whom the Company is doing business.

Violations of the Confidentiality Policy

Employees who violate the Confidentiality of Information policy are subject to disciplinary action up to and including termination, and may also be subject to civil and/or criminal penalties for violation of applicable laws.



ON-THE-JOB CONDUCT

In an organization the size of **SP+**, certain Company policies must be established so that the entire operation will function smoothly and efficiently. As an employee of the Company, you will be expected to obey all rules, regulations and policies. If you violate any of these, you may be subject to disciplinary action, up to and including termination.

Courtesy and Customer Focus

Customers expect and deserve to be treated with respect at all times. Courteous conduct with customers is essential. Under no circumstances are you permitted to argue with a customer, even if you believe you are correct. Use of profanity to a customer is strictly forbidden. Regardless of the circumstances, any lack of courtesy on your part may result in termination.

In all contacts with the public, you should:

- Greet individuals and groups pleasantly, courteously and sincerely.
- Listen attentively and patiently. Be sure to get the facts in determining the nature of their request or their complaint.
- Never eat, smoke, use smokeless tobacco, use vaporizer products or chew gum while waiting on a customer.
- Always use the guest's name when available.
- Never use vulgar or offensive language with an employee, client or a customer.
- Do everything possible to close each contact on a friendly note.
- Show enthusiasm when interacting and dealing with the customer.
- Take care of each customer without rushing anyone.
- Always thank the customer for their business.

The integrity and privacy of our customers is paramount to our service. You should never disclose to anyone outside of Company or to any coworker (unless there is a business need), the name of any customer, or information related to any individual transaction, including but not limited to: sales amount, vehicle type, attendance at an event or location.

Field Work Regulations

It is your responsibility to become familiar with the Company's Standard Operating Procedures (SOP). The SOP document is located on the Company's SPin website (<http://spin.spplus.com>) or the Company's Intranet website (<http://spin.flashspot.com/login.asp>) which can be accessed through **SP+ University** (<http://spplusuniversity.com>). While there are certain specific operational procedures that will vary with each location, the intent of the requirements listed in the SOP document applies to all locations. If you have any questions after reviewing the SOP and taking the required courses on **SP+ University**, please feel free to discuss with your supervisor. Any violation of these regulations or other unsatisfactory work performance may result in discipline.

Leaving Assigned Duties



The manager is responsible for the whereabouts of all employees and for maintaining proper staffing at all times. If an employee finds it is necessary to leave the property at any time during work hours, the employee must do the following:

1. Obtain permission from the manager before taking a break;
2. Punch out when leaving and punch in when returning; and
3. Check in with the manager immediately upon return.

Failure to follow procedures may result in disciplinary action up to and including termination.

Telephones, Cell Phones and Personal Electronics

Use of Company telephones for personal calls, both incoming and outgoing are prohibited unless it is an emergency. Any employee found to have excessive personal telephone calls will be subject to appropriate disciplinary action and they may be held responsible for the cost the Company has incurred. Locations may have specific rules governing telephone usage due to business demands. Personal cell phones are to be used on break and meal times only. While on duty, personal cell phones must be turned off or placed on "silent" mode. Personal calls should be made either before or after scheduled shift or on meal breaks, except in the case of an emergency. If there is an emergency, see the manager immediately.

Unless required to as part of your work duties, you may not use the image recording (photograph or video) or sound recording functions of any camera/video-equipped device or other image recording equipment (e.g., cell phones, tablets, digital cameras, video cameras, etc.) on the premises of your assigned work location except in employee break areas. **SP+** has a fundamental responsibility to ensure the integrity and confidentiality of its clients' and customers' confidential information, and to maintain the security of our environment and customers.

Employees found violating this policy will be subjected to disciplinary action.

Computer and Electronic Communications

The Company reserves the right to monitor, inspect or search at any time all Company information systems. This examination may take place with or without the consent, presence or knowledge of the involved employees. The information systems subject to such examination include, but are not limited to, electronic mail system files, computer hard drive files, network files, voicemail files, internet usage and fax machine output. Because Company computers and networks are provided for business purposes only, workers should have no expectation of privacy associated with the information they store in or send/receive through these information systems. Company management retains the right in its sole discretion to remove from its information systems any material it views as potentially illegal or harmful to the computer's operating system. Employees found abusing or using the computer for personal use during work hours may be subjected to disciplinary action.

All contents of The Company's IT resources and communications systems are the property of The Company. Therefore, employees should have no expectation of privacy whatsoever in any message, files, data, document, facsimile, telephone conversation, social media post, conversation or message, or any other kind of information or communications transmitted to, received or printed from, or stored or recorded on The Company's electronic information and communications systems.

You are expressly advised that in order to prevent misuse, The **Company reserves the right to monitor, intercept, and review, without further notice, every employee's activities using the company's IT resources and communications systems, including but not limited to social media postings and activities, and you consent to such monitoring by your acknowledgment**



of this policy and your use of such resources and systems. This might include, without limitation, the monitoring, interception, accessing, recording, disclosing, inspecting, reviewing, retrieving, and printing of transactions, messages, communications, postings, logins, recordings, and other uses of the systems as well as keystroke capturing and other network monitoring technologies.

The Company also may store copies of such data or communications for a period after they are created, and may delete such copies from time to time without notice.

Do not use the Company's IT resources and communications systems for any matter that you desire to be kept private or confidential from the Company.

Security Access and Passwords

Security of the Company's IT resources and communications systems is the responsibility of the Information Technology (IT) Department, including approval and control of employees' and others' access to systems and suspension or termination of access in cases of misuse and when a user is no longer an employee or otherwise ineligible to use the systems.

It is the responsibility of each employee to adhere to IT security guidelines including but not limited to the creation, format and scheduled changes of passwords. All user names, pass codes, passwords, and information used or stored on the Company's computers, networks and systems are the property of the Company. No employee may use a user name, pass code, password or method of encryption that has not been issued to that employee or authorized in advance by the company.

No employee shall share their assigned user names, pass codes or passwords with any other person. An employee shall immediately inform the IT Department if he or she knows or suspects that any user name, pass code or password has been improperly shared or used, or that IT security has been violated in any way

Attendance

On any occasion when you are unable to report to work on time due to an unscheduled absence (e.g., due to an illness or emergency), you must call your manager/supervisor at least two hours prior to the starting time, or as soon as possible if the circumstances do not allow for such prior notice. The same notice requirements must be followed if you will be reporting to work late due to an unscheduled emergency. You should advise your manager/supervisor of the reason for the absence, and tell him/her when you can be expected to return to work. If you are uncertain of the length of the absence required, you must call in **each day** in advance of the scheduled starting time and notify your manager/supervisor of the continued absence. Proper notice of absence or late arrival should be given **directly to your manager/supervisor**; if you leave a message with a co-worker, you do so at your own risk.

If an absence is due to an illness or injury, you may be required to provide appropriate medical certification to support the absence and/or fitness to return to work. Failure to provide proper notification or certification of absence or lateness, as well as unexcused absences, late arrivals or early departures from work may result in disciplinary action, up to and including termination.

If you fail to report to work for three consecutive work days and fail to notify your manager/supervisor of the absence, you will be treated as if you have resigned.

Reporting to Work



Failure to observe scheduled working hours reduces productivity and places an unfair burden on fellow employees. You are expected to report to work as scheduled, and are to be at your work station in proper attire (this may include a uniform) and ready to begin work at the assigned starting time and again at the prescribed time after break and meal periods. Employees may not arrive at the workplace any earlier than 15 minutes before scheduled shift and should leave the workplace within 15 minutes after scheduled shift end. You should be ready to begin work immediately after “clocking in.” At the end of your shift, you should “clock out” before preparing to leave work. Violations of the policy may result in disciplinary action.

Kinds of Disciplinary Action

When an employee fails to perform work duties to established standards of performance or behaves improperly it is necessary to take actions to correct the problem. For some violations, including but not limited to, absenteeism, poor work quality or disobeying a work regulation or rule, improper conduct **may** be addressed progressively through verbal warning, written warning, suspension, and ultimately termination. An employee may be suspended pending investigation until further information is gathered. In cases where discipline is necessary, the following actions should be followed (the circumstances of each situation will be taken into consideration):

Verbal Warning: Your violation will be discussed with you and you will be told the consequences of further violations. (This is often accompanied by written documentation.)

Written Warning: Your violation will be recorded and explained to you. You will be given a copy of the written warning and will be requested to sign the written warning (or separate acknowledgment form) to acknowledge receipt.

Suspension: A manager may put an employee on leave without pay for disciplinary purposes. This should be done in writing. Employees may also be placed on suspension pending an investigation of a violation that, if founded, may result in termination.

Termination: This is the strongest type of personnel action and may be the result of a series of violations. Individuals may also be terminated for a severe, single violation of a work rule or policy/procedure violation.

If the employee refuses or fails to sign the disciplinary form, the discipline is still valid.

The Company reserves the right to bypass any of these progressive disciplinary steps depending on the severity of the violation and the factors involved.

Behavior That Could Result in Immediate Termination

- Gross negligence or carelessness in the performance of duties
- Gross insubordination: disobeying supervisors, management or member of the Chicago or Nashville Support Offices
- Engaging in any activity that harms or threatens the business or reputation of **SP+** or their clients
- Disobeying a regulation, policy, or a safety rule
- Withholding money, tips or property from co-workers, customers or clients
- Dishonesty, embezzlement, or unauthorized possession of Company, customer, co-worker, or client property (including the misappropriation of credit card information)
- Using alcohol or controlled substances on the job, reporting to work under the influence of alcohol or controlled substances, or having such in your possession during working hours

- Falsification of records, including but not limited to, documents drafted as part of your work duties, employment application or personnel documents, or willful misrepresentation of facts
- Misuse or falsification of tickets
- Carrying a weapon on Company or client property unless specifically authorized to do so
- Fighting, hitting, pushing or using obscene or threatening language or gestures, or any other disorderly conduct while on Company premises or arising from Company business relations
- Being discourteous or unprofessional towards customers or clients; swearing or using abusive or obscene language with, or within proximity of customers or clients
- Abuse of any customer, client or Company property or equipment, including but not limited to, using Company, client or customer vehicle for personal use without permission or driving a customer's car outside the facility without permission
- Conviction of a criminal act which adversely affects your job-related activities
- Giving out confidential or proprietary information about the Company, its locations or its clients
- Engaging in any form of discrimination or harassment including sexual harassment
- Refusal to cooperate in a Company investigation
- Retaliation against individual(s) who brings forth information regarding alleged policy violations or other illegal or inappropriate behavior within the workplace
- The establishment of a pattern of excessive absenteeism or tardiness; failure to notify a supervisor regarding tardiness or absence and failure to report to work
- Engaging in excessive, unnecessary, or unauthorized use of supplies, particularly for personal purposes
- Gambling on Company premises
- Sleeping or malingering while on duty; abandoning your work post without prior approval
- Failure to report traffic tickets, accidents or change in the status of the employee's driver's license during the course of employment and while in a driving position
- Excessive speeding or carelessness while driving a Company, client's or customer's vehicle or carelessly causing damage to a Company, client's or customer's vehicle
- Failure to maintain accurate and proper accountability and control of cash banks or related Company cash. This includes excessive or continuous cash shortages or other irregularities.
- Mishandling of revenue, failing to follow cash-handling procedures (or, in case of managers, to enforce those procedures), misrepresentation of collections and receipts and/or failing to give a satisfactory explanation of repeated errors in parking tickets and collections.
- Failure to report accidents, breakage or damage to equipment and machinery, which occurs when you are assigned to drive a vehicle or use equipment and machines
- Giving false information when accidents are being investigated
- Failure to hand in to your manager/supervisor any and all "lost and found" items
- Failure to comply with Company policies and/or directives, including, without limitation, the Company's Code of Business Conduct and the policies and procedures outlined in the Employee Handbook
- Failure to notify the Human Resources Department of any felony or job related misdemeanor conviction that occurred prior to or during employment

The above listing is not intended to be all-inclusive.

Solicitations and Distributions

You are not permitted to distribute or circulate printed materials or make solicitations during working time or during non-working times in areas where it will disturb other employees that are working. Distribution will not be permitted during working time or non-working time in working areas. Solicitation



and distribution by non-employees on Company property or within the confines of Company premises is strictly prohibited.

Solicitation includes, but is not limited to, approaching someone in person or through employer-owned property such as computers, smartphones, email systems and intranets for any of the following purposes:

- Offering anything for sale.
- Asking for donations.
- Collecting funds or pledges.
- Seeking to promote, encourage or discourage participation in or support for any organization, activity or event, or membership in any organization.
- Distributing or delivering membership cards or applications for any organization.

Distribution includes, but is not limited to, disseminating or delivering in person or through employer-owned property such as bulletin boards, computers, smartphones, emails and intranets any literature or other materials including circulars, notices, papers, leaflets or other printed, written or electronic matter (except that distributing or delivering membership cards or applications for any organization is considered solicitation and not distribution).

- **Working time** includes any time in which either the person doing the solicitation (or distribution) or the person being solicited (or to whom non-business literature is being distributed) is engaged in or required to be performing work tasks. Working time excludes times when employees are properly not engaged in performing work tasks, including break periods and meal times.
- **Working areas** include areas controlled by the Company where employees are performing work, excluding, for example, cafeterias, break rooms, The Company's email system and parking lots.

This policy is not intended to restrict employees' communications or actions that are protected or required by state or federal law, including discussing terms and conditions of employment/exercising protected rights under Section 7 of the National Labor Relations Act, or otherwise disclosing information as permitted or required by law.

Publicity

From time to time, The Company may use a photo or video of the Employee participating in a work function or activity. The Employee hereby irrevocably consents to any and all uses and displays, by The Company and its agents, representatives and licensees, of the Employee's name, voice, likeness, image, appearance, and biographical information in, on or in connection with any pictures, photographs, audio and video recordings, digital images, websites, television programs and advertising, other advertising and publicity, sales and marketing brochures, books, magazines, other publications, CDs, DVDs, tapes, and all other printed and electronic forms and media throughout the world, at any time during or after the period of his/her employment by The Company, for all legitimate commercial and business purposes of the Company ("**Permitted Uses**") without further consent from or royalty, payment, or other compensation to the Employee. The Employee hereby forever waives and releases The Company and its directors, officers, employees, and agents from any and all claims, actions, damages, losses, costs, expenses, and liability of any kind, arising under any legal or equitable theory whatsoever at any time during or after the period of his/her employment by the Company, arising directly or indirectly from The



Company Group's and its agents', representatives', and licensees' exercise of their rights in connection with any Permitted Uses.

Conflict of Interest

A conflict of interest can occur when an employee is in a position to influence a decision that may result in a personal gain for the employee or the employee's family member as a result of the Company's business dealings. Company executives and management have a fiduciary obligation to the Company and as such business opportunities should first be presented to the CEO of the Company. Executives and management should not have competing business interests with the Company. Executives and management should refer to the Code of Ethics and Business Conduct as the Handbook Addendum for Exempt Employees.

If you have a question about whether a situation is a potential conflict of interest, please contact the Legal Department.

OFF-DUTY CONDUCT

Confidentiality of Information Policy

It is the policy of **SP+**, to ensure that the operations, activities and business affairs of our Company and our clients are kept confidential to the greatest extent possible. If during their employment, employees acquire confidential or proprietary information about **SP+** or its clients, such information is to be handled in strict confidence and not to be discussed with outsiders. Employees are also responsible for the internal security of such information.

No employee is to give out any information concerning our customers or clients except as required by law. It is imperative that associates never give out any information about a guest or discuss observations. Never divulge names or room numbers (if applicable). In addition, any such requests for information should be directed to your manager/supervisor and/or the Human Resources Department. Employees who violate the Confidentiality of Information policy are subject to disciplinary action up to and including termination, and may also be subject to civil and/or criminal penalties for violation of applicable laws.

Outside Jobs

If your personal circumstances make it necessary for you to obtain additional employment during your off-duty hours, you must notify your manager of your outside job. Outside employment that interferes with your **SP+** employment or causes a conflict of interest will not be permitted. Violations of this policy may result in discipline up to and including termination.

Nothing prevents the Company from revoking a previously approved outside job on the grounds that the position has since resulted in any interference or conflict of interest with the employee's current job with **SP+**.

This policy is not intended to restrict employees' communications or actions that are protected or required by state or federal law, including discussing terms and conditions of employment/exercising protected rights under Section 7 of the National Labor Relations Act, or otherwise disclosing information as permitted or required by law.

Social Media and Online Communication Policy

At **SP+**, we understand that the internet and social media can be a fun and rewarding way to share your life and opinions. However, use of social media also presents certain risks and carries with it certain responsibilities. To assist, we have established these guidelines for appropriate use of social media and other online communication.

Social media includes all means of communicating or posting information or content of any sort on the internet, including to your own or someone else's website or blog, journal or diary, personal website, social networking or affinity website, web bulletin board or a chat room, whether or not associated or affiliated with the Company, as well as any other form of electronic communication.

You are solely responsible for what you post online. Before posting content, consider some of the risks and rewards that are involved. Keep in mind that any of your conduct that adversely affects your job performance, the performance of fellow employees or otherwise adversely affects clients, customers, people who work on behalf of the Company or the Company's legitimate business interests may result in disciplinary action up to and including termination.

Carefully read these guidelines, the Company's Business Code of Conduct, the Discrimination and Harassment Policy, and other relevant policies, and ensure your postings are consistent with these policies. Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including termination.

Responsible Social Media Practice when posting Company or related industry content online:

- **Be Respectful.** Always be fair and courteous to fellow employees, customers, clients, or people who work on behalf of the Company. Defamatory or hurtful content does not accomplish anything. Work related issues or complaints are more likely to be resolved by speaking directly with your co-workers, or by utilizing our Open Communication and Problem Resolution Policies. If you decide, however, to post complaints or criticism, avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating, that disparage customers, clients, or employees, or that might constitute harassment or bullying. Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of race, color, national origin, gender, sexual orientation, religion, age, disability, veteran status, or any other legally protected status as defined by applicable laws.
- **Be honest and accurate.** When posting information or news, make sure your facts are always accurate. If you make a mistake, correct it quickly. Never post any information or rumors that you know to be false about the Company, fellow employees, clients, customers, and people working on behalf of the Company or competitors. It discredits your reputation and the organization.
- **Linking to Company Information.** You should not create a link from your blog, website or other social networking site to the Company's website without identifying yourself as an employee of the Company. (For example, linking to spplus.com from your LinkedIn profile, while an employee, is totally acceptable. Linking from your *personal* twitter account is not.)
- **Personal Opinions.** When expressing personal opinions to any website, social media outlet or blog, do not represent yourself as a spokesperson for the Company. If the Company, or its services, are a topic of discussion:

- You should state that you are an employee, and make clear that your views are your own, and you do not represent those of the Company, clients, customers, or people working on behalf of the Company.
- If anyone outside the organization wishes to get in touch with the company, have them contact us through our website: <http://www.spplus.com/contact-general/>
- If you do publish a blog or post any content online related to the work you do, or subjects associated with the Company, make it clear that you are not speaking on behalf of the Company. It is best practice to include a disclaimer such as, “The postings on this site are my own and do not necessarily reflect the views of my employer.”

The following cannot be posted online:

- **Proprietary Information.** As an employee, you are bound to maintain the confidentiality of the Company’s trade secrets and private or confidential information. Trade secrets may include information regarding the development of systems, processes, products, know-how and technology. Do not reference or post internal reports, policies, procedures or other internal business-related confidential communications.
- **Any non-disclosed financial information.** It is illegal to communicate or give a “tip” on inside information to others so that they may buy or sell stocks or securities. Such online conduct violates the Insider Trading Policy will result in disciplinary action, and could lead to being tried in a court of law. The Insider Trading Policy can be found on the Legal Department Page of SPin as well as in the Business Code of Conduct.

Using Social Media at Work. Refrain from using social media while on work time or on Company equipment, unless it is work-related, authorized by your manager, and consistent with both the Company’s Cell Phone and Personal Electronics Policy, as well as the Computer and Electronic Communications Policy (both policies are detailed above). Do not use the Company’s email addresses to register on social networks, blogs or other online tools utilized for personal use.

If you are an hourly or non-exempt employee, any time spent viewing or participating in social media outside of your scheduled work hours will not be considered paid time unless required by your immediate manager.

Compliance with Related Policies and Agreements

Social media should never be used in a way that violates any other The Company policies or employee obligations. If your social media activity would violate any of The Company’s policies in another forum, it will also violate them in an online forum. For example, employees are prohibited from using social media to:

- Violate the Company’s IT resources and communications systems policies.
- Violate the Company’s confidentiality and proprietary rights policies.
- Circumvent the Company’s ethics and standards of conduct policies.
- Engage in unlawful harassment.
- Circumvent policies prohibiting unlawful discrimination against current employees or applicants for employment.
- Violate the Company’s privacy policies (for example, never access private password-protected sites of coworkers or other company stakeholders without permission).



Employees who violate The Company policies may be subject to discipline, up to and including termination of employment.

Retaliation is prohibited. The Company prohibits any negative action against any employee for reporting a possible violation of this policy or for cooperating in an investigation. Any employee who retaliates against another employee for reporting possible violations of this policy or for cooperating in an investigation will be subject to disciplinary action, up to and including termination.

If you need to have questions pertaining to Social Media, please contact the Human Resources Department at 312-274-2000.

PAY PRACTICE AND PROCEDURES

Exempt Employees

Exempt employees are individuals who satisfy the definitions of executive, administrative or professional employees or other exempt classifications as defined by applicable state and federal wage and hour laws. Exempt employees are not eligible for overtime compensation, are expected to devote the hours of work necessary to perform their duties, and are paid on a salaried basis.

Non-Exempt Employees

You are a “non-exempt” employee if you do not satisfy the definitions of executive, professional, administrative or other exempt classifications as defined by applicable state and federal law. If you are a non-exempt employee, you are eligible for overtime compensation in accordance with applicable wage and hour laws, and you must comply with the time reporting requirements established by the Company. Non-exempt employees are predominately paid on an hourly basis, but may also be paid on a salary basis.

If you have any questions about your employment status, please ask your manager/supervisor or contact the Human Resources Department.

Timekeeping

All hourly, non-exempt employees will be paid based on the hours shown in our time and attendance system. Your manager will show you the location of the timekeeping mechanism and explain how to record your starting time, stopping time and mealtime. If you forget to, or have trouble punching in or out, you must let your manager know so an adjustment can be made to reflect the proper number of hours worked. Employees scheduled to take a meal break must clock in and out. If an employee fails to clock in or out for their meal break, or for beginning and end times, they may be subject to disciplinary action. Rest and/or meal breaks must be taken when scheduled. No employee is permitted to record another employee’s time. Anyone recording another employee’s time or permitting another employee to record his time will be subject to disciplinary action up to and including termination of employment.

Time Records

Many **SP+** employees are classified as hourly, non-exempt and are compensated on an hourly basis. It is very important to keep accurate time records and this is the responsibility of the employee.



- Employees must clock themselves in and out.
- **Meal periods** are generally unpaid and the conditions governing your meal period will be set by your manager/supervisor according to your work requirements and applicable law. Employees must clock out for meal breaks and clock in following the end of the break.
- **Rest Periods:** If applicable, your manager/supervisor will set the break times according to your work requirements and applicable law.
- All overtime must be approved **in advance** by your manager/supervisor.
- Any changes to the hours listed on an employee's timecard must be adjusted in the appropriate system with justification for changes added in the comments section by the manager/supervisor.
- All tips earned **MUST** be reported. Your manager/supervisor will instruct you on the appropriate means of reporting your tips.
- Managers are required to review and approve all time cards in the appropriate system for their direct reports prior to the deadline mandated by the Company's Payroll Department.

Overtime

Supervisors determine schedules as needed and employees should clock in and out according to that schedule. No hourly employees are to work off the clock. All overtime is to be approved by the manager prior to the employee working beyond their scheduled work time. Overtime will then be paid according to federal and state laws. While you will be paid if you work overtime without obtaining proper authorization, you will be disciplined (up to and including termination) for not having received proper prior authorization.

For purposes of calculating overtime, the work day commences at 12:00 a.m. and ends at 11:59 p.m. The work week commences on Saturday at 12:00 a.m. and ends Friday at 11:59 p.m. Also, for purposes of overtime calculations, hours paid for time off for any reason (holiday, sick, vacation, meal, etc.) will not be deemed to be hours worked unless otherwise required by applicable state or local law or a collective bargaining agreement. The Company reserves the right to change the work week as it pertains to calculating overtime. Should this occur, the Company will notify employees and ensure that employees are paid appropriately during the change.

Paychecks

Employees are paid every two (2) weeks, unless a local, state or federal law dictates otherwise. **SP+** offers two methods of payment:

1. Direct Deposit
2. Pay Card

Paystubs can be accessed through the Employee Self Serve website or the online site of the current pay card (where applicable) See your manager for more information.

Employees are to be compensated for all hours worked during a pay period. Immediately report any payroll discrepancies to your supervisor/manager. If your supervisor/manager does not address the discrepancy, please contact the Human Resources Department via the **SP+** Hotline (800-245-4714) or via the internet at reportlineweb.com/spplus.

Work Assignment and Schedules

Your work hours will be set when you begin employment, and thereafter are subject to adjustment at the Company's discretion. Your specific schedule and location assignment are subject to change based



on business requirements. You may also be required to work overtime if business conditions require it. At the Company's sole discretion, you may also be transferred to a different location.

Employment Verifications

All employment verification, income verification and requests for immigration letters for **SP+** employees should be directed through Corporate Cost Control® "CCCVerify", **SP+**'s vendor for automated employment and income verifications.

- CCCVerify is a fast, secure and automated service for employment verification, income verification and immigration letters
- Available 24 hours a day, 7 days a week - this automated service can be accessed anytime, anywhere
- There is no charge to employees for use of this service
- To access CCCVerify, please visit <https://www.cccverify.com> or call 1-855-901-3099. You will be prompted to enter your PIN which is the last 4 digits of your SSN, basic information and your email address.

For more detailed information, please refer to the CCCVerify.com poster at your location, the Company's SPin website (<http://spin.spplus.com>) or the Company's Intranet website (<http://spin.flashspot.com/login.asp>) which can be accessed through **SP+ University** (<http://spplusuniversity.com>). Please contact your manager/supervisor with any questions.

Return of Property

SP+ employees will receive materials, property and/or uniforms that are the property of the Company to use in their daily job duties. In the event that the employee leaves on a voluntary or involuntary basis, he is responsible for returning all Company property. Where permitted by applicable laws, the Company may withhold from the employee's paycheck the cost of any items that are not returned or take appropriate legal action to recover or protect its property.

Tip Reporting-Tip Credit Policy

Tip Reporting: Certain "tipped" positions qualify to be paid at an approved hourly rate below the state minimum wage. Therefore, the accurate reporting of all tips by employees is required. It is the responsibility of the employee receiving tips to report all monies collected at the end of each shift, via the time clock system. No exceptions - employees must comply with the law.

Employees are obligated to inform the Company when tips received are less than the federal and/or state's tip credit to ensure that the tip credit claimed by the Company does not exceed the amount of tips actually received. Employees will be asked to sign a Tip Acknowledgement Form indicating their understanding of how tips are to be reported to the Company. Accurate tip reporting is taken seriously by the Company. Intentionally misstating tips earned can be cause for dismissal. If an employee believes his/her paycheck is inaccurate for any reason, the employee must bring this to the attention of the direct manager immediately

Tip Credit: The difference between the federal and/or state's minimum wage from the federal and/or state's tipped minimum wage. Some locations, in particular states, permit the Company to utilize a tip credit toward an employee's wage. If this applies, the employee will be informed that the tip credit applies.



All tips received by employees are to be retained by the employee except for a valid tip pooling arrangement, limited to employees who customarily and regularly receive tips.

All tip policies will comply with local, state and federal laws,

LEAVE BENEFITS

All paid time off (PTO) information and policies (including Holiday pay/schedules, Sick Leave, Mental Health/Personal Leave, and Vacation Benefits) can be located in the benefits section of the Company's SPin website (<http://spin.spplus.com>) or the Company's Intranet website (<http://spin.flashspot.com/login.asp>) which can be accessed through **SP+ University** (<http://spplusuniversity.com>). These policies may change from time to time and it is your responsibility to stay informed of any such changes. To the extent that there is any conflict between state or local ordinances and these policies, such that you would be provided greater benefits than those outlined in the Company policies, such ordinance will apply.

Bereavement Leave

The Company understands your need to spend time away from work to attend to family matters during times of bereavement and **SP+** provides the following leave benefits for full-time employees: after you have worked for **SP+** for 6 months, you may take up to 3 days paid leave due to the death of an immediate family member (spouse, registered domestic partners, parents, grandparents, children, brothers, sisters, parents-in-law, grandchildren) and 1 day for extended family. With appropriate documentation, you may be granted an additional two days of paid leave when the death or funeral requires out-of-state travel. All eligible employees must notify their manager/supervisor about the applicable details in any given case. **To the extent that there is any conflict between state or local ordinances and this policy, such that you would be provided greater benefits than those outlined here, such ordinance will apply.**

Military Leave

Unpaid military leave of absence is granted to employees who are absent from work because of service in the United States Armed Forces or because of injuries received during service or training in the United States Armed Forces in accordance with the Uniformed Services Employment and Reemployment Rights Act (USERRA) and all applicable state laws.

Employees who are returning to employment from a USERRA protected leave of absence should ensure they are engaging with their local manager and the Benefits Department at leaves@spplus.com to ensure a smooth, timely transition back to employment with SP+. Employees may always contact leaves@spplus.com with any questions related to their transition back to SP+.

Jury/Witness Leave

If you are called to serve as a juror or to appear as a witness in a trial, you will be given as much time as needed to fulfill your civic obligations. You will be reinstated to your former position with no loss of benefits or seniority, provided you report for work as soon as your witness/jury leave is completed.

Pay While On Leave: Full-time employees who are summoned for service on a jury or as court witnesses will receive their regular pay (minus the amount of pay received for witness/jury duty) for up to four weeks in a one-year period. If you are participating in the Company's insurance programs, and



your witness/jury duty leave exceeds four weeks, you will be responsible for submitting to the Company your portion of the insurance premium payments during the unpaid leave period.

Documentation Needed: If you are called for service, you must show your summons to your manager/supervisor on the first working day after receiving the notice. Your manager/supervisor will approve the leave unless the critical nature of your work calls for an employer-requested postponement of or release from duty. Your leave will begin on the day you are scheduled to appear.

You will be expected to call your manager/supervisor weekly to keep him/her advised about your expected return to work. You must report for work as soon as witness/jury duty is completed.

If you are excused by the Court on any day during your period of jury/witness service, you will be expected to come in to work.

Personal Leave of Absence

Full-time employees who have one year or more of service with the Company may be eligible for a personal leave of absence without pay. This type of leave may be granted for up to six months at management's sole discretion for *urgent* personal reasons (e.g., personal or family tragedy). Personal leaves will be granted only after the employee has used all accrued annual vacation and mental health/personal days.

Written requests for such leaves stating the reason for the leave must be submitted to the manager/supervisor and the Benefits Department at leaves@spplus.com in the Chicago Support Office as soon as possible under the circumstances. Requests for any extensions of personal leave (in writing) must be submitted to and approved by the manager/supervisor and the Benefits Department. *In no case may a personal leave of absence last longer than 6 months.*

Vacation time, sick leave and mental health/personal time and other benefits will not accrue during the personal leave. You will be responsible for submitting to the Company the full cost of the insurance premium in order to continue any group insurance coverage during any personal leave. Contact the Benefits Department with questions.

Return To Work From Personal Leave

Upon a timely return from an approved leave of absence or any extension thereof, the Company will attempt to return an employee to his or her former position, or to a comparable position for which the employee is qualified if available, provided that the employee is able to perform the essential job functions of the position. Because, however, the Company's need to fill a position may override its ability to hold a position open until an employee returns from his or her leave, the Company cannot assure that it will be able to return an employee to *any* position after an approved leave.

The Company has the sole discretion to determine what constitutes a "comparable position" and whether the employee is qualified to perform it. A comparable position may include one in another facility. If an employee refuses to accept any position offered within one calendar week after such offer, the employee will be deemed to have resigned. If neither the employee's same position nor a comparable position for which the employee is qualified is available at the end of the leave of absence, employment will be terminated.

Employee's Obligation To Notify of Return To Work



It is the employee's responsibility to contact the Benefits Department at leaves@spplus.com at least two weeks before the leave will end to initiate his or her return to work and job placement. Failure to make contact at least two weeks before the leave ends could affect consideration for, and the availability of, job openings. If the employee does not make contact by the time the leave expires, he or she will be considered as having voluntarily resigned his or her employment.

Failure To Return to Work Upon Expiration of Leave Period

An employee who fails to return from an approved leave of absence (including any approved extensions thereof) when the leave expires will be considered as having voluntarily resigned his or her employment. The length of a leave of absence is the specified period determined and approved by the Company at the time of the leave request, or any request for an extension thereof. Employees who do not request an extension of leave prior to the end of a leave will be expected to return upon the originally approved return date.

Integration of Vacation and Paid Sick Leave With State Disability Insurance And Workers' Compensation

The Company may require, or you may elect, to integrate vacation and paid sick leave with State Disability Insurance (SDI) (where applicable) and Workers' Compensation benefits as follows: you first receive those SDI or Workers' Compensation benefits for which you are eligible (if any), and then receive your accrued vacation and/or paid sick leave (for which you are otherwise eligible) to total 100% of your regular pay until all accrued vacation and paid sick leave is used.

Such integration is at your option during a workers' compensation leave. When required by state law, integration of vacation also is optional during a pregnancy disability leave. During all other leaves, the Company will require such integration in accordance with applicable laws.

Family and Medical Leave (FMLA)

Under the Family and Medical Leave Act, employees are eligible (i) to take up to 12 weeks of unpaid family/medical leave as set forth below within any 12 month period, and (ii) to be restored to the same or an equivalent position upon the employee's return from leave *if* the employee: (1) has worked for the Company for at least 12 months *and* worked at least 1,250 hours in the last 12 months; *and* (2) is employed at a worksite that has 50 or more employees within a 75 mile radius. The "12-month period" is measured backward from the date a leave under this policy is to begin.

Employees in California may also qualify for leave in accordance with the California Family Rights Act (the "CFRA").

Reasons For Leave: Eligible employees may take family/medical leave for any of the following reasons: (1) birth of a child and in order to care for such child; (2) placement of a child with the employee for adoption or foster care; (3) to care for a spouse, child, or parent (a "covered family member") with a serious health condition; (4) because of the employee's own serious health condition that renders the employee unable to perform the functions of the employee's position; (5) for any qualifying exigency arising out of the fact that a spouse, son, daughter, or parent is a military member on covered active duty or call to covered active duty status; or (6) to care for a serious injured or ill covered service member (leave may last up to 26 workweeks in a single 12-month period for this reason only). Leave taken due to reasons (1) or (2) must be completed within the 12 month period beginning on the date of birth or placement. In addition, spouses employed by the Company who request leave because of reasons (1)



or (2) or to care for an ill parent may only take a combined aggregate total of 12 weeks leave for such purposes during any 12 month period.

Employees in California who meet the FMLA eligibility requirements are also eligible to take a leave of absence for reasons (1) through (4) above in accordance with the California Family Rights Act. However, except for certain leaves related to pregnancy, an FMLA/ CFRA leave cannot exceed twelve (12) weeks in any 12-month period.

Employees may not be granted an FMLA leave to gain employment or work elsewhere, including self-employment. If employees misrepresent facts in order to be granted an FMLA leave, employees will be subject to immediate termination.

Notice of Leave: If an employee's need for family/medical leave is foreseeable, the employee must give the Company at least 30 days prior written notice. Failure to do so may be grounds for delay of leave. Where the need for leave is not foreseeable, employees are expected to notify the Company as soon as practicable, generally within 1 to 2 business days of learning of the need for leave. To request a leave, employees should use the *Request for Family/Medical Leave* forms that are available from the Benefits Department at leaves@spplus.com.

Serious Health Condition: Serious Health Condition means an illness, injury, impairment, or physical or mental condition that involves either: (1) Any period of incapacity or treatment connected with inpatient care (i.e., an overnight stay) in a hospital, hospice, or residential medical-care facility, and any period of incapacity or subsequent treatment in connection with such inpatient care; or (2) Continuing treatment by a health care provider ("HCP") which includes any period of incapacity (i.e. inability to work, attend school or perform other regular daily activities) due to:

1. A health condition (including treatment, or recovery there from) lasting more than 3 consecutive days, and any subsequent treatment or period of incapacity relating to the same condition, that also includes treatment two or more times by or under the supervision of a HCP or one treatment by a HCP with a continuing regimen of treatment; or
2. Pregnancy or prenatal care. A visit to the HCP is not necessary for each absence; or
3. A chronic serious health condition which continues over an extended period of time, requires periodic visits to a HCP, and may involve occasional episodes of incapacity (e.g. asthma, diabetes). A visit to a HCP is not necessary for each absence; or
4. A permanent or long-term condition for which treatment may not be effective (e.g. Alzheimer's, a severe stroke, terminal cancer). Only supervision by a HCP is required, rather than active treatment; or
5. Any absences to receive multiple treatments for restorative surgery or for a condition which would likely result in a period of incapacity of more than 3 days if not treated (e.g. chemotherapy or radiation treatments for cancer).

Medical Certification: If an employee is requesting leave because of the employee's own or a covered family member's serious health condition, the employee and the relevant health care provider must supply appropriate medical certification. Employees may obtain *Medical Certification Forms* from Company's SPin website (<http://spin.spplus.com>) or the Company's Intranet website (<http://spin.flashspot.com/login.asp>) which can be accessed through **SP+ University** (<http://spplusuniversity.com>). The medical certification must be provided within 15 days after it is requested, or as soon as reasonably possible under the circumstances. Failure to provide requested medical certification in a timely manner may result in denial of leave until it is provided.

The Company, at its expense, may require an examination by a second, Company designated health care provider if the Company reasonably doubts the medical certification the employee initially provides. If the second health care provider's opinion conflicts with the original medical certification, the Company,



at its expense, may require a third, mutually agreeable health care provider to conduct an examination and provide a final and binding opinion. The Company also may require medical recertification periodically during the leave, and an employee may be required to present a fitness-for-duty verification upon returning to work after a leave taken due to the employee's own illness.

Health Care Provider is defined as:

1. doctors of medicine or osteopathy authorized to practice medicine or surgery by the state in which the doctors practice; or
2. podiatrists, dentists, clinical psychologists, optometrists and chiropractors (limited to manual manipulation of the spine to correct a subluxation as demonstrated by x-ray to exist) authorized to practice, and performing within the scope of their practice, under state law; or
4. nurse practitioners, nurse-midwives and clinical social workers authorized to practice, and performing within the scope of their practice, as defined under state law; or
5. Christian Science practitioners listed with the First Church of Christ, Scientist in Boston, Massachusetts; or
6. any HCP recognized by the employer or the employer's group plan benefits manager.

Reporting While on Leave: Employees taking leave because of the employee's own serious health condition or to care for a covered family member may be required to contact the employee's manager/supervisor on a regular basis to keep the manager/supervisor informed regarding the status of the condition and the employee's intention to return to work. For leaves for other purposes, an employee may be required to report periodically regarding current status and the employee's intent to return to work.

Leave is Unpaid: Family/medical leave is unpaid leave. If an employee requests leave because of a birth, adoption or foster care placement of a child, or to care for a covered family member with a serious health condition, the employee's accrued paid vacation and personal days must first be used in lieu of the corresponding amount of unpaid family/medical leave. If an employee requests leave because of the employee's own serious health condition, the accrued paid vacation, personal days and sick time to which the employee is entitled must first be used in lieu of the corresponding amount of unpaid family/medical leave. During a leave for a pregnancy-related disability, an employee is not required to use vacation or personal days, but may elect to.

When state law requires, an employee will not be required to use vacation, personal days or sick time if the employee is receiving state disability or workers' compensation benefits during the leave, but may elect to do so, although an employee may not receive more than an amount equal to 100% of his or her salary from a combination of the paid time and state disability or workers' compensation benefits. The receipt of disability or workers' compensation benefits or the substitution of paid leave time for unpaid leave time does not extend the 12-week family/medical leave period.

Medical and Other Benefits: During an approved family/medical leave, the Company will maintain the employee's health benefits as if the employee had continued to be actively employed. To the extent paid leave is substituted in lieu of unpaid family/medical leave, the Company will deduct any employee portion of the health plan premium as a regular payroll deduction. To the extent the employee's leave is unpaid, the employee must pay his or her portion of the premium during the leave, and the employee should be mindful of the fact that his or her group health care coverage may cease if the employee's premium payment is more than 30 days late. If an employee does not return to work at the end of the leave period, the employee may be required to reimburse the Company for the cost of health care premiums paid by the Company for maintaining coverage during the employee's unpaid leave, unless the employee cannot return to work because of a serious health condition or other circumstances beyond the employee's control. Employees do not accrue paid time off while on FMLA leave.



Intermittent and Reduced Schedule Leave: Leave that is required because of a serious health condition may be taken intermittently (in separate blocks of time due to a single covered health condition) or on a reduced schedule leave (reducing the usual number of hours an employee works per work week or work day) if medically necessary. FMLA leave may also be taken intermittently whenever medically necessary to care for a family with a serious health condition. If leave is unpaid, the Company will reduce the employee's salary based on the amount of time missed. In addition, while an employee is on an intermittent or reduced schedule leave, the Company may temporarily transfer the employee to an available alternative position which better accommodates the employee's recurring leave and which has equivalent pay and benefits.

Use of intermittent FMLA leave for the birth & care of a child or placement for adoption or foster care is subject to the Company's approval.

When intermittent leave is needed to care for an immediate family member or the employee's own serious health condition, and is for planned medical treatment, the employee must try to schedule treatment so as not to unduly disrupt the Company's operations.

Returning From Leave: An employee who wishes to return to work at the expiration of his or her family/medical leave is entitled to return to the same position or to an equivalent position with equal pay, benefits and other terms and conditions of employment. An employee taking leave because of the employee's own serious health condition is required to provide medical certification that the employee is fit to resume work. Employees failing to provide return-to-work medical certification will not be permitted to resume work until it is provided. The Medical Certification form is on the Company's SPin website under the "Benefits" section or the Company's intranet accessible through **SP+ University**.

Policy Administration: This policy is intended to comply (and will be administered in accordance) with the Family and Medical Leave Act of 1993 and any applicable regulations, definitions and law thereunder, as well as any state family or medical leave laws granting additional rights that are applicable to employees employed in such states. Employees will also find a copy of additional rights under the Family and Medical Leave Act attached to this Handbook.

Interrelation of Leaves: Any leave taken pursuant to this policy, other Company policies, or a law which qualifies as leave under the FMLA, CFRA or any applicable state family or medical leave act, will be counted against (i) the employee's available leave under the applicable Company policy or policies, collective bargaining agreement and/or law, as well as (ii) the available leave under the FMLA, CFRA or applicable state law, to the extent permitted by such applicable law.

Other Leaves

Other forms of leave may be applicable to employees depending on State and Local laws. The Company will comply with any legally required leave matters. Should an employee have a question about a legally required leave provision, please speak with your manager or leaves@spplus.com.

Legal Compliance: These other forms of leave, as well as those listed above, will be interpreted and applied in accordance with applicable federal, state, local laws, and to the extent that this policy may conflict with those laws, they are controlling over this policy. Further, the Company retains all available rights and defenses under applicable law, whether or not specifically set forth in this policy.



Leave Reminder

If you are not at work during your regular working hours, you must be on authorized leave. This means that your manager knows of, and has approved, your absence. Do not assume that your manager knows where you are, or that someone else has advised him or her of your need to miss work. Failure to promptly and adequately advise your manager of an absence will result in disciplinary action, up to and including termination.

TRAINING AND EMPLOYEE AWARDS

Service Awards

As an employee of **SP+**, you play a critical role in making our customers and clients feel welcomed, appreciated and secure. The Company recognizes that this is one of the most important factors to the Company's success.

Service Awards are one of the ways in which the Company rewards employees for their commitment to **SP+** and its success. If you have any questions about your eligibility for a Service Award, please contact your supervisor or the Human Resources Department.

Employee Training / SP+ University

Our dedication to the long term success of our employees is what underpins our training ideology. We believe that every employee should not only be given the tools and skills necessary to be successful in their current position, but they should also have access to tools to prepare them for an advanced career within our Company. With that goal in mind, our training is designed and developed to ensure our staff achieves a degree of mastery in each position they have within our organization.

SP+ University is the face of our training department offering access to job specific curriculums, course content, materials, and reporting. As a web-based resource, **SP+ University** gives our employees access to training 24/7. Every adult learns differently and to ensure each learning style is met, we offer our coursework in classroom, web session as well as self-paced online formats.

Just as our employees are unique, our client's needs are unique as each run their business differently. We recognize that every location has individual requirements for defining and carrying out operational excellence. To that end, we consult with our clients to ensure that all operational expectations and location-specific needs are identified and addressed in the development of our training solutions.



ACKNOWLEDGMENT OF RECEIPT OF HANDBOOK

I acknowledge having received a copy of the company’s Employee Handbook and I agree to read and become familiar with its contents.

The Handbook replaces any previous understanding, practice, manual, handbook, policy or representation concerning the subject matters that it covers. My employment relationship with the Company is voluntary, and there is no specified length of employment. **This Employee Handbook is not intended to express or imply any contractual obligation by the Company to continue, or to follow any stated policy or procedure with respect to employment. Employment is at-will and I understand that I have the unrestricted right to terminate my employment at any time with or without cause or prior notice.** The Company may terminate or change the terms of my employment (including without limitation terms regarding promotion or demotion, transfer, compensation, benefits, duties and location of work) with or without cause or prior notice.

All guidelines, policies, benefits and procedures in this Handbook may be changed from time to time at the discretion of the Company, and no revision to the Company’s policy of at-will employment will be effective unless expressed in writing signed by me and an officer of the Company holding the position of President or Chief Executive (or higher).

Employee Name (print)

Employee Signature **Date Signed**