



**Consultant  
Handbook**  
November 2018





Welcome!

On behalf of your colleagues, we welcome you to Market Street Talent and wish you every success here.

We believe that each employee contributes directly to Market Street Talent's growth and success, and we hope you will take pride in being a member of our team.

This handbook was developed to describe some of the expectations of our employees and to outline the policies, programs, and benefits available to eligible employees. Employees should familiarize themselves with the contents of the employee handbook as soon as possible, for it will answer many questions about employment with Market Street Talent and how you can support our mission: to be the leading provider of technical human resources for northeast banking, insurance, financial services and high-tech enterprises.

We live by our guiding principles, which are to work with and for each other, and always on behalf of our clients ("Clients"). Above all, act with integrity and pursue excellence. In everything we do, have empathy towards the Client's true needs, keep a clear focus on only the important opportunities, show honest care for the desired quality and outcomes, and treat all people with the utmost respect.

We hope that your experience here will be challenging, enjoyable, and rewarding. We have full confidence that you will thrive here as we promote and foster the growth of Information Technology in our world - one candidate, one Client, one community at a time.

Again, welcome!

Sincerely,

*Jennifer Gray*

## EMPLOYEE ACKNOWLEDGEMENT FORM

The employee handbook describes important information about Market Street Talent, and I understand that I should consult Jennifer Gray regarding any questions not answered in the handbook.

I have entered into my employment relationship with Market Street Talent voluntarily and acknowledge that there is no specified length of employment. Accordingly, either Market Street Talent or I can terminate the relationship at will, with or without cause, at any time.

Since the information, policies, and benefits described here are necessarily subject to change, I acknowledge that revisions to the handbook may occur, except to Market Street Talent's policy of employment-at-will. All such changes will be communicated through official notices, and I understand that revised information may supersede, modify, or eliminate existing policies. Only Jennifer Gray has the ability to adopt any revisions to the policies in this handbook.

Furthermore, I acknowledge that this handbook is neither a contract of employment nor a legal document. I have received the handbook, and I understand that it is my responsibility to read and comply with the policies contained in this handbook and any revisions made to it.

EMPLOYEE'S NAME (printed): \_\_\_\_\_

EMPLOYEE'S SIGNATURE: \_\_\_\_\_

DATE: \_\_\_\_\_

## **101 Nature of Employment**

Employment with Market Street Talent is voluntarily entered into, and the employee is free to resign at will, with or without cause per the terms of the W2 Consulting Services Agreement. Similarly, Market Street Talent (hereinafter “Market Street Talent” or “Company”) may terminate the employment relationship at will per the terms of the W2 Consulting Services Agreement.

The provisions of the handbook have been developed at the discretion of management and may be amended or cancelled at any time, at the Company's sole discretion.

These provisions supersede all existing policies and practices and may not be amended or added to without the express written approval of Jennifer Gray.

## 102 Equal Employment Opportunity

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at Market Street Talent will be based on merit, qualifications, and abilities. Market Street Talent does not discriminate in employment opportunities or practices on the basis of race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, genetic information, or any other characteristic protected by law.

Market Street Talent will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship. This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training.

Any employee with questions or concerns about any type of discrimination in the workplace is encouraged to bring these issues to the attention of Jennifer Gray. Employees can raise concerns and make reports without fear of reprisal. Anyone found to be engaging in any type of unlawful discrimination will be subject to disciplinary action, up to and including termination of employment.

## 103 Business Ethics and Conduct

The successful business operation and reputation of Market Street Talent is built upon the principles of fair dealing and ethical conduct of our employees. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

Our continued success is dependent upon our Clients' trust and we are dedicated to preserving that trust. Employees have a responsibility to Market Street Talent and its Clients to act in a way that will merit their continued trust and confidence.

Market Street Talent will comply with all applicable laws and regulations and expects its employees to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.

In general, the use of good judgment, based on high ethical principles, will guide you with respect to lines of acceptable conduct.

If a situation arises where it is difficult for you to determine the proper course of action you should discuss the matter openly with Jennifer Gray for advice and consultation.

It is the responsibility of all employees to report ethics violations or suspected violations in accordance with this policy. No employee who in good faith reports an ethics violation shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Compliance with this policy of business ethics and conduct is the responsibility of every employee. Disregarding or failing to comply with this standard of business ethics and conduct could lead to disciplinary action, up to and including possible termination of employment.

## 104 Conflicts of Interest

Employees have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. This policy establishes only the framework within which Market Street Talent wishes the business to operate. The purpose of these guidelines is to provide general direction so that employees can seek further clarification on issues related to the subject of acceptable standards of operation. Contact Jennifer Gray for more information or questions about conflicts of interest.

An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or for a relative as a result of business dealings. For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

No "presumption of guilt" is created by the mere existence of a relationship with other organizations. However, if employees have worked for another staffing agency or have relationships with individuals at competing agencies, it is imperative that they disclose to Jennifer Gray as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.

## **105 Outside Employment**

Employees may be employed by another organization while employed by Market Street Talent as long as they meet the scheduling requirements and performance standards of their job with Market Street Talent and Client, and the other job(s) do not create a conflict of interest with Market Street Talent or Client.

All employees will be judged by the same performance standards and will be subject to Market Street Talent's scheduling demands, regardless of any existing outside work requirements.

If the Company determines that an employee's outside work interferes with performance or the ability to meet the requirements of his/her position, the employee may be asked to terminate the outside employment if he or she wishes to remain employed at the Company. Note that an employee's job requirements, including required days and hours of work, may be modified at any time.



## **106 Confidentiality/Non-Disclosure/Non-Solicitation**

The protection of confidential business information is vital to the interests and the success of Market Street Talent and its Clients. Such confidential information includes, but is not limited to, the following examples:

- Client/contractor/referral lists and information
- Consultant lists and information
- Pending proposals
- Financial information
- Internal forms and processes
- Marketing strategies
- Computer programs, passwords and codes
- Personnel and compensation records

All employees shall not during the term of any assignment or any time thereafter, use for his or her own benefit or disclose any confidential information of Market Street Talent or Client to any person not employed by Market Street Talent or Client nor to any other entity, except as may be necessary to perform Employee services for Market Street Talent or Client and only upon express written authorization by Market Street Talent or the Client.

All employees may be required to sign a non-competition, non-solicitation and/or non-disclosure agreement as a condition of employment.

Employees who improperly use or disclose confidential information will be subject to disciplinary action, up to and including termination of employment and legal action, even if they do not actually benefit from the disclosed information.

## **201 Access to Personnel Files**

Market Street Talent maintains a personnel file on each employee. The personnel file includes such information as the employee's job application, resume, records of training, documentation of performance appraisals and salary changes, and other employment records.

Personnel files are the property of Market Street Talent, and access to the information they contain is restricted. Generally, only management personnel who have a legitimate reason to review information in a file are allowed to do so.

Employees who wish to review their own file should contact Jennifer Gray. With reasonable advance notice, employees may review their own personnel files in Market Street Talent's offices.

Current employees will be provided copies of their files at no charge. There will be a charge of \$1 per page for requests for copies made by terminated employees or their legal counsel.

## **202 Reference Checks**

All calls requesting reference information on current or former employees must be referred to Jennifer Gray, as only Jennifer Gray is authorized to respond to reference check inquiries from other employers. Employees who provide reference information in violation of this policy will be subject to disciplinary action.

Market Street Talent will respond to reference inquiries by confirming dates of employment and position(s) held. Employees may access their compensation data through the online payroll system.

## **203 Personal Data Changes**

It is the responsibility of each employee to promptly notify Market Street Talent of any changes in personal data.

Personal mailing addresses, telephone numbers, tax withholding information, number and names of dependents, the individual to be contacted in the event of an emergency, educational accomplishments, and other such status reports should be accurate and current at all times.

If any personal data has changed, notify Jennifer Gray.

## **301 Holidays**

Consultants observe the holiday schedule of the Client Company where they are on assignment. Holiday time is unpaid.

## **304 Health and Dental Insurance**

The health insurance and dental insurance plans provide employees and their dependents access to health and dental insurance benefits.

Eligible employees may participate in the health and/or dental insurance plans subject to all terms and conditions of the agreement between Market Street Talent and the insurance carriers.

Employees may enroll in the health and/or dental insurance plans at the time of hire, during open enrollment, and/or if a qualifying event occurs. Newly hired employees are eligible to enroll in coverage beginning on the first of the month after hire.

Details of the health insurance and dental plans and information on cost of coverage will be provided in advance of enrollment. Plan designs, vendors and contributions are subject to change at the discretion of management. If changes are made, employees will be notified in advance.

If you have any questions regarding this benefit, please contact Jennifer Gray.

## **305 401(k) Savings Plan**

Market Street Talent has established a 401(k) savings plan to provide employees the potential for future financial security for retirement.

The 401(k) savings plan allows you to elect how much salary you want to contribute so you can tailor your own retirement package to meet your individual needs.

To be eligible to join the 401(k) savings plan, you must complete 6 months of full-time service. You may join the plan immediately after meeting eligibility requirements. Eligible employees may participate in the 401(k) plan subject to all terms and conditions of the plan.

Plan design, vendors and contribution levels are subject to change at the discretion of management. When changes are made employees will be notified in advance.

If you have questions regarding this benefit, please contact Jennifer Gray.

## **401 Timekeeping**

Employees shall maintain records of the hours that services have been performed, have a Client representative verify those hours by signing the records, and submit those records to Market Street Talent each week.

Questions about timekeeping and hours of work may be directed to Jennifer Gray.



## **402 Paydays and Pay Deductions**

All employees are paid biweekly on Friday, or on a frequency mandated by state law.

Each paycheck will include earnings for all work performed and reported through the end of the previous payroll period.

Employees may have pay directly deposited into their bank accounts if they provide advance written authorization to Market Street Talent. Employees may access their payroll information online at any time.

The law requires that certain deductions be made from every employee's compensation. Among these are applicable federal, state, and local income taxes. Market Street Talent also must deduct Social Security taxes on each employee's earnings up to a specified limit that is called the Social Security "wage base." Market Street Talent matches the amount of Social Security taxes paid by each employee.

Pay deductions must be taken for legal garnishments presented to Market Street Talent against employees, such as child support.

If an employee feels there is an error in his/her paycheck or has a question about a deduction, s/he should immediately notify Jennifer Gray.

## 501 Safety

A workplace safety program has been established to assist in providing a safe and healthful work environment for employees. The Safety Committee has the responsibility for implementing, administering, monitoring and evaluating the safety program. Its success depends on the alertness and personal commitment of all.

Some of the best safety improvement ideas come from employees. Those with ideas, concerns or suggestions for improved safety in the workplace are encouraged to discuss them with their supervisor, a member of the Safety Committee, or Jennifer Gray. All reports can be made without fear of reprisal.

Employees must immediately report any unsafe condition to Jennifer Gray.

Employees who violate safety standards, who cause hazardous or dangerous situations, or who fail to report or, where appropriate, remedy such situations, may be subject to disciplinary action, up to and including termination of employment.

In the case of work-related accidents that result in injury, regardless of how insignificant the injury may appear employees should immediately notify Jennifer Gray. Such reports are necessary to comply with laws and initiate insurance and workers' compensation benefits procedures, if applicable.

## **502 Safe Driving Policy**

While driving employee or company-owned vehicles for work purposes, employees must comply with traffic legislation, be conscious of road safety, and demonstrate safe driving habits. This includes obeying state legislation regarding mobile device use while operating a vehicle.

## **503 Use of Phone, Mail and Other Equipment**

When using Market Street Talent and Client property, employees are expected to exercise care, perform required maintenance, and follow all operating instructions, safety standards, and guidelines.

Excessive personal use of the telephone, computers, or other business equipment is not permitted. In addition, the use of Company-paid postage for personal correspondence is not permitted.

Please notify your supervisor if any equipment, machines, or tools, appear to be damaged, defective, or in need of repair. Prompt reporting of damages, defects, and the need for repairs could prevent deterioration of equipment and possible injury to employees or others.

The improper, careless, negligent, destructive, or unsafe use or operation of equipment may result in disciplinary action, up to and including termination of employment.

## 504 Computer and Email Usage

Computers, computer files, the email system, and software furnished to employees are Market Street Talent's or its Clients' property and are intended for business use. The Company or Client as applicable may access its respective communication and computer systems and obtain the communications within the systems, including past voice mail and e-mail messages, without notice to users of the system, in the ordinary course of business when the Company or Client as applicable deems it appropriate to do so. Further, the Company or Client as applicable may review Internet usage. The reasons for which the Company or Client as applicable may obtain such access include, but are not limited to: maintaining the systems; preventing or investigating allegations of system abuse or misuse; assuring compliance with all laws including, without limitation, software copyright laws; complying with legal and regulatory requests for information; and ensuring that Company or Client operations continue appropriately during an employee's absence. **To ensure compliance with this policy, computer and email usage may be monitored by Company or Client as applicable.**

Employees should not use a password, access a file, or retrieve any stored communication without authorization. All Company passwords – including but not limited to laptop, email, and professional account passwords – should be changed every 90 days.

We strive to maintain a workplace free of harassment and sensitive to the diversity of our employees. Therefore, the use of computers, voice mail and the email system in ways that are disruptive, offensive to others, or harmful to morale are prohibited.

For example, the display or transmission of sexually explicit images, messages, and cartoons is not allowed. Other such misuse includes, but is not limited to, ethnic slurs, racial comments, off-color jokes, or anything that may be construed as harassment or showing disrespect for others.

Email may not be used to solicit others for commercial ventures, religious or political causes, outside organizations, or other non-business matters. Use of a Market Street Talent or Client email address for non-work purposes is prohibited.

Market Street Talent and its Clients purchase and license the use of various computer software for business purposes and do not own the copyright to this software or its related documentation. Market Street Talent prohibits the illegal duplication of software and its related documentation.

Employees should notify their supervisor or Jennifer Gray upon learning of violations of this policy. Employees who violate this policy will be subject to disciplinary action, up to and including termination of employment.

## 505 Internet Usage

The following guidelines have been established to help ensure responsible and productive Internet usage. Internet usage is intended for job-related activities. Occasional, brief personal use is permitted within reasonable limits.

All Internet data that is composed, transmitted, or received via our or our Client's computer communications systems is considered to be part of the official records of Market Street Talent and/or its Clients as applicable and, as such, is subject to disclosure to law enforcement or other third parties. Consequently, employees should always ensure that the business information contained in email messages and other transmissions is accurate, appropriate, ethical, and lawful.

The equipment, services, and technology provided to access the Internet remain at all times the property of Market Street Talent and/or its Clients as applicable. As such, Market Street Talent and its Clients reserves the right to monitor Internet traffic, and retrieve and read any data composed, sent, or received through our online connections and stored in our computer systems.

Data that is composed, transmitted, accessed, or received via the Internet must not contain content that could be considered discriminatory, offensive, obscene, threatening, harassing, intimidating, or disruptive to any employee or other person. Examples of unacceptable content may include, but are not limited to, sexual comments or images, racial slurs, gender-specific comments, or any other comments or images that could reasonably offend someone on the basis of race, age, sex, religious or political beliefs, national origin, disability, sexual orientation, transgender identity or any other characteristic protected by law.

The unauthorized use, installation, copying, or distribution of copyrighted, trademarked, or patented material on the Internet is expressly prohibited. As a general rule, if an employee did not create material, does not own the rights to it, or has not gotten authorization for its use, it should not be posted on the Internet. Employees are also responsible for ensuring that the person sending any material over the Internet has the appropriate distribution rights.

Internet users should take the necessary anti-virus precautions before accessing the Internet. All anti-virus software should be kept up-to-date.

Abuse of the Internet access provided by Market Street Talent and/or its Clients in violation of law or Market Street Talent or its Clients' policies will result in disciplinary action, up to and including termination of employment.

## 505 Internet Usage (continued)

Employees may also be held personally liable for any violations of this policy. The following list is not all-inclusive but includes examples of previously stated or additional actions and activities that are prohibited and can result in disciplinary action:

- Using the Company's or Client's time and resources for personal gain, including personal shopping
- Sending or posting messages or material that could damage the Company's or Client's image or reputation
- Sending or posting confidential material or proprietary information outside of the Company's or Client's organizations
- Sending or posting discriminatory, harassing, or threatening messages or images
- Participating in the viewing or exchange of pornography or obscene materials
- Sending or posting messages that defame or slander other individuals
- Passing off personal views as representing those of the Company or Client organizations
- Sending anonymous email messages
- Stealing, using, or disclosing someone else's password without authorization
- Attempting to break into the computer system of another organization or person
- Refusing to cooperate with a security investigation
- Sending or posting chain letters, solicitations, or advertisements not related to business purposes or activities
- Using the Internet for political causes or activities, religious activities, or any sort of gambling
- Copying, pirating, or downloading software and electronic files without permission
- Violating copyright law or failing to observe licensing agreements
- Engaging in unauthorized transactions that may incur a cost to the organization or initiate unwanted Internet services and transmissions
- Jeopardizing the security of the Company's or the Client's electronic communications systems
- Sending or posting messages that disparage the Company's or Client's or any other organization's products or services
- Engaging in any illegal activities

## 506 Social Media

Market Street Talent encourages employees to share information with co-workers and with those outside the Company for the purposes of gathering information, generating new ideas, and learning from the work of others. Social media provide inexpensive, informal, and timely ways to participate in an exchange of ideas and information. However, information posted on a website is available to the public and, therefore, the Company has established the following guidelines for employee participation in social media.

**Note:** As used in this policy, “social media” refers to blogs, forums, and social networking sites, such as Twitter, Facebook, LinkedIn, YouTube, and MySpace, among others.

**Off-duty use of social media.** Employees may maintain personal websites or web logs on their own time using their own equipment. Employees must ensure that social media activity does not interfere with their work. In general, we believe maintaining personal relationships through social media with Clients and/or consultants do negatively affect important professional boundaries. Therefore, employees should not be “friends” (or similar social media relationships) via social media with Clients or contractors. Connections via business-related networking sites such as LinkedIn are permitted.

The Company considers off-duty social media activities to be personal endeavors, and employees may use them to express their thoughts or promote their ideas as long as they do not conflict with Company or Client policies or business.

**On-duty use of social media.** Employees may engage in social media activity during work time provided it is directly related to their work, approved by their supervisor, and does not identify or reference the Company, Clients, contractors, or vendors without express permission. The Company monitors employee use of the Company’s computers and the Internet, including, without limitation, employee blogging and social networking activity.

**Respect.** We expect that you will demonstrate respect for the dignity of the Company, its owners, its Clients, its vendors, and its employees. A social media site is a public place, and employees should avoid embarrassing readers, employees, Clients, vendors, or owners. Do not use ethnic slurs, personal insults, or obscenity, or use language that may be considered inflammatory. Even if a message is posted anonymously, it may be possible to trace it back to the sender.

**Post disclaimers.** If an employee identifies himself or herself as a Market Street Talent employee or discusses matters related to the Company on a social media site, the site must include a disclaimer on the front page stating that it does not express the views of the Company and that the employee is expressing only his or her personal views. For example: “The views expressed on this website/Web log are mine alone and do not necessarily reflect the views of my employer.” Place the disclaimer in a prominent position and repeat it for each posting expressing an opinion related to the Company or the Company’s business. Employees must keep in mind that if they post information on a social media site that is in violation of Company policy and/or federal, state, or local law, the disclaimer will not shield them from disciplinary action.



## 506 Social Media (continued)

**Competition.** Employees should not use a social media to criticize the Company's competition and should not use it to compete with the Company.

**Confidentiality.** Do not post information or reference Clients, contractors or employees. Do not post pictures of Company property or co-workers on the Internet without express permission. Employees may write about their jobs in general but may not disclose any confidential or proprietary information. For examples of confidential information, please refer to the confidentiality policy. When in doubt, ask before publishing.

**New ideas.** Please remember that new ideas related to work or Market Street Talent's business belongs to the Company. Do not post them on a social media site without the Company's written permission.

**Trademarks and copyrights.** Do not use the Market Street Talent logo or trademarks on a social media site, or reproduce other material without first obtaining written permission.

**Legal.** Employees are expected to comply with all applicable laws (e.g., copyright, trademark, discrimination or harassment).

**Company restrictions.** The Company may also require employees to delete references to it on a website or Web log and to stop identifying themselves as an employee of the Company.

**Discipline.** Violations of this policy may result in discipline up to and including immediate termination of employment.

## 701 Employee Conduct and Work Rules

To ensure orderly operations and provide the best possible work environment, Market Street Talent expects employees to follow rules of conduct that will protect the interests and safety of all employees and the organization.

It is not possible to list all the forms of behavior that are considered unacceptable in the workplace. This list is not all-inclusive and the following are examples of infractions of rules of conduct that may result in disciplinary action, up to and including termination of employment. Disciplinary action up to and including termination of employment may occur for violations not listed below.

- Violation of personnel policies
- Unsatisfactory performance or conduct
- Sexual or other unlawful or unwelcome harassment
- Excessive absenteeism, or any absence without notice
- Unauthorized absence from work site during the workday
- Conducting personal business during paid work time
- Insubordination or other disrespectful conduct
- Unauthorized disclosure of confidential information
- Theft or inappropriate removal or possession of property
- Falsification of timekeeping records
- Working under the influence of alcohol or illegal drugs
- Possession, manufacture, distribution, sale, transfer, or use of alcohol or illegal drugs in the workplace, while on duty, or while operating employer-owned vehicles or equipment
- Fighting or threatening violence in the workplace
- Boisterous or disruptive activity in the workplace
- Possession of dangerous or unauthorized materials, such as explosives or firearms, in the workplace
- Negligence or improper conduct leading to damage of employer-owned or customer-owned property
- Violation of safety or health rules
- Violation of Information Security Policy and rules and/or Data Risk Policy and rules
- Unauthorized use of telephones, mail system, or other employer-owned equipment

## **702 Attendance and Punctuality**

To maintain a productive work environment, Market Street Talent expects employees to be reliable and to be punctual in reporting for scheduled work. Absenteeism and tardiness place a burden on other employees and are not acceptable.

In the rare instances when you are unable to work as scheduled, you must personally notify your supervisor as soon as possible in advance of the anticipated tardiness or absence.

An absence without appropriate notification may result in dismissal.

Poor attendance and excessive tardiness are disruptive. Either may lead to disciplinary action, up to and including termination of employment.

## **703 Personal Appearance**

During business hours or when representing Market Street Talent, you are expected to present a professional, clean, neat, and tasteful appearance. Consultants on assignment are expected to follow the dress code policies of the Client company where they are on assignment.

If the Client feels your personal appearance is inappropriate, you may be asked to leave the workplace until you are properly dressed or groomed. Under such circumstance, you will not be compensated for the time away from work. Consult your supervisor if you have questions as to what constitutes appropriate appearance. Where necessary, reasonable accommodation may be made for a person with a disability.

## 704 Return of Property

Employees are responsible for items issued or given to them for use during their employment with Market Street Talent. These items may include:

- Client information
- Contractor information
- Credit cards
- Equipment
- Keys/access devices
- Manuals and other written materials
- Cell phones
- Computer equipment/laptop computers

Employees must return all Market Street Talent or Client property immediately upon request or upon termination of employment. Where permitted by applicable laws, Market Street Talent may withhold from the employee's expense check or paycheck the cost of any items that are not returned when required. Market Street Talent or Client may also take all action deemed appropriate to recover or protect its property.

## 705 Discipline

This policy describes the policy for administering fair and consistent discipline for unsatisfactory conduct at Market Street Talent.

We believe it is important to make sure that all employees are treated fairly and that disciplinary actions are prompt, consistent, and impartial. The major purpose of a disciplinary action is to correct the problem, prevent it from happening again, and if appropriate prepare the employee for satisfactory performance in the future.

Market Street Talent may use discipline at its discretion.

Disciplinary action may include any of the following: verbal warning, written warning, suspension with or without pay, or termination of employment. Some types of employee problems may justify either a suspension or termination of employment without prior disciplinary action.

You should also look at the Conduct and Work Rules policy in this handbook. That policy lists examples of unacceptable conduct that might result in immediate suspension or termination of employment.

We hope that most employee problems can be corrected at an early stage, benefiting both the employee and Market Street Talent.

## **706 Problem Resolution**

Market Street Talent is committed to providing the best possible working conditions for its employees. Part of this commitment is encouraging an open and frank atmosphere in which any problem, complaint, suggestion, or question receives a timely response from management.

We strive to ensure fair and honest treatment of all employees. Management and employees are expected to treat each other with mutual respect. Employees are encouraged to offer positive and constructive criticism.

If a situation occurs when employees believe that a condition of employment or a decision affecting them is unjust or inequitable, they are encouraged to discuss it with their supervisor. If the employee believes that the discussion did not resolve the problem they are encouraged to contact Jennifer Gray.

Not every problem can be resolved to everyone's total satisfaction, but only through understanding and discussion of mutual problems can employees and management develop confidence in each other. This confidence is important to the operation of an efficient and harmonious work environment, and helps to ensure everyone's job security.

## 707 Workplace Etiquette

Market Street Talent strives to maintain a positive work environment where employees treat each other with respect and courtesy. Sometimes issues arise when employees are unaware that their behavior in the workplace may be disruptive or annoying to others. Many of these day-to-day issues can be addressed by politely talking with a co-worker to bring the perceived problem to his or her attention. In most cases, common sense will dictate an appropriate resolution. We encourage all employees to keep an open mind and graciously accept constructive feedback or a request to change behavior that may be affecting another employee's ability to concentrate and be productive.

The following workplace etiquette guidelines are not necessarily intended to be hard and fast work rules with disciplinary consequences. They are simply suggestions for appropriate workplace behavior to help everyone be more conscientious and considerate of co-workers and the work environment.

Please contact Jennifer Gray if you have comments, concerns, or suggestions regarding these workplace etiquette guidelines.

- Monitor the volume when listening to voice mail or a speakerphone that others can hear.
- Refrain from using inappropriate language, including swearing.
- Avoid detailed discussions of your personal life/issues
- Be conscious of how your voice travels, and try to lower the volume of your voice when talking on the phone or to others in open areas.
- Keep socializing to a minimum, and try to conduct conversations in areas where the noise will not be distracting to others.
- Minimize unscheduled interruptions of other employees while they are working.
- Avoid public criticisms or accusations of others or of Company policies or procedures. Address such issues privately with those involved or your supervisor.
- Clean up after yourself.



## **801 Leave Policy**

### **Generally:**

While regular attendance is crucial to maintain business operations, Market Street Talent recognizes that, for a variety of reasons, employees may need time off from work. Market Street Talent has available a number of types of leaves of absence. Some are governed by law and others are discretionary. For all planned leaves, however, employees must submit a request at least 30 days in advance except to the extent another notice period is otherwise permitted by applicable law; in case of emergencies, employees should submit the request as soon as they become aware of the need for leave. All leaves must have the approval of Market Street Talent management. If, during a leave, an employee accepts another job, engages in other employment or consulting outside of Market Street Talent, or applies for unemployment insurance benefits, the employee may be considered to have voluntarily resigned from employment with Market Street Talent.

All requests for a leave of absence will be considered in light of their effect on Market Street Talent and its work requirements, as determined by Market Street Talent management, which reserves the right to approve or deny such requests in its sole discretion, unless otherwise required by law. For disability-related leave requests, Market Street Talent will engage in an interactive process with the employee to determine if a leave is the most appropriate accommodation. The employee must provide a certification from his or her health care provider to Market Street Talent to support a leave for medical reasons. Failure to provide the required certification to Market Street Talent in a timely manner will result in delay or denial of leave. If an employee requires an extension of leave, the employee must request such extension and have it approved before the expiration of the currently approved leave.

While Market Street Talent will make a reasonable effort to return the employee to his or her former position or a comparable position following an approved leave of absence, there is no guarantee that the employee will be reinstated to his or her position, or any position, except as required by law.

Moreover, in compliance with the Americans with Disabilities Act (ADA), Market Street Talent provides reasonable accommodations to qualified individuals with disabilities to the fullest extent required by law. Market Street Talent may require medical certification of both the disability and the need for accommodation. Keep in mind that Market Street Talent can only seek to accommodate the known physical or mental limitations of an otherwise qualified individual.

Therefore, it is your responsibility to come forward if you are in need of an accommodation. Market Street Talent will engage in an interactive process with you to identify possible accommodations, if any will help you perform the job.

### **Pregnancy-Disability Leave:**

Employees who are disabled on account of pregnancy, childbirth, or a related medical condition may request an unpaid leave of absence. Such leave will be granted for the period of disability, up to a maximum of four months. Time off may be requested for prenatal care, severe morning sickness, doctor-ordered bed rest, childbirth, and recovery from childbirth.

Leave provided for pregnancy disability is treated separately from leaves required by the federal family and medical leave law. However, the first 12 workweeks of a pregnancy disability leave will be treated concurrently as a leave pursuant to the federal Family and Medical Leave Act ("FMLA") for all eligible employees.

## **801 Leave Policy (continued)**

Employees who wish to take a pregnancy disability leave must notify Human Resources of the date the leave is expected to commence and the estimated duration of the leave. Notice should be given as indicated above. The employee must also provide a medical certification of disability to Market Street Talent. Failure to provide the required medical certification to Market Street Talent in a timely manner will result in delay or denial of leave. Before returning to work, the employee must provide a medical certification that she is able to resume her original job duties. Appropriate forms may be obtained from Human Resources.

Except as otherwise permitted under applicable law, Employees who return to work immediately following the expiration of an approved pregnancy disability leave will generally be reemployed in their former position or a comparable job.

Employees who are affected by pregnancy may also be eligible to transfer to a less strenuous or hazardous position or duties, provided certain prerequisites are met. Reasonable accommodations may be requested with the advice of the employee's health care provider. In addition, lactation accommodation is also available, upon request. For more information on pregnancy disability leave or transfer and its effect on the terms, conditions or benefits of employment, please contact Human Resources.

## **FAMILY AND MEDICAL LEAVE (“FMLA”)**

### **Eligibility Requirements**

Employees are eligible for FMLA if:

- At least fifty (50) or more employees are employed within a 75-mile radius of the employee’s work site;
- The employee has been employed for at least one year; and
- The employee has worked at least 1,250 hours within the previous twelve (12) months.

### **Basic Leave Entitlement**

Market Street Talent will provide up to twelve (12) weeks of unpaid, job-protected leave in a 12-month period to eligible employees for certain family and medical reasons. The 12-month period is determined on a “rolling” 12-month period dating back from the time the employee takes leave. Leave may be taken for any one, or for a combination, of the following reasons:

- To care for the employee’s child after birth, or placement for adoption or foster care;
- To care for the employee’s spouse, son or daughter, or parent (but not in-law) who has a serious health condition; and/or
- For the employee’s own serious health condition (including any period of incapacity due to pregnancy, prenatal medical care or childbirth) that makes the employee unable to perform one or more of the essential functions of the employee’s job.

### **Military Family Leave**

Eligible employees with a spouse, son, daughter, or parent on covered active duty or called to covered active duty status (or has been notified of an impending call or order to covered active duty) in the Reserve component of the Armed Forces for deployment to a foreign country in support of a contingency operation or Regular Armed Forces for deployment to a foreign country may use their 12-week leave entitlement to address certain qualifying exigencies. Qualifying exigencies may include attending certain military events, arranging for alternative childcare, addressing certain financial and legal arrangements, attending certain counseling sessions, caring for the parents of the military member on covered active duty and attending post-deployment reintegration briefings.

FMLA also includes a special leave entitlement which permits eligible employees who are the spouse, son, daughter, parent or next of kin of a covered service member to take up to twenty-six (26) weeks of leave to care for the covered service member with a serious injury or illness during a single 12-month period (one time basis only). A covered service member is a current member of the Armed Forces, including a member of the National Guard or Reserves, who is undergoing medical treatment, recuperation, or therapy, is otherwise in outpatient status, or is on the temporary retired list, for a serious injury or illness. These individuals are referred to in this policy as “current members of the Armed Forces.” Covered service members also includes a veteran who is discharged or released from military services under condition other than dishonorable at any time during the five year period preceding the date the eligible employee takes FMLA leave to care for the covered veteran, and who is undergoing medical treatment, recuperation or therapy for a serious injury or illness. These individuals are referred to in this policy as “covered veterans.”

The FMLA definitions of a “serious injury or illness” for current Armed Forces members and covered veterans are distinct from the FMLA definition of “serious health condition” applicable to FMLA leave to care for a covered family member.

### **Job Benefits and Protection**

If applicable, during FMLA leave, Market Street Talent must maintain health coverage under any “group health plan” on the same terms as if the employee had continued to work. If paid time off, if any, is substituted for unpaid leave, Market Street Talent will deduct the employee’s portion of any applicable health plan premium as a regular payroll deduction. If the employee’s leave is unpaid, the employee must make arrangements with Human Resources prior to taking leave to pay any applicable health insurance premiums each month.

Market Street Talent’s obligation to maintain health care coverage ceases if an employee’s premium payment is more than 30 days late. If an employee’s payment is more than 15 days late, Market Street Talent will send a letter notifying the employee that coverage will be dropped on a specified date unless the co-payment is received before that date. If employees do not return to work at the end of the leave period (unless employees cannot return to work because of a serious health condition or other circumstances beyond their control), they will be required to reimburse Market Street Talent for the cost of the premiums Market Street Talent paid for maintaining coverage during their unpaid FMLA leave. For purposes of this paragraph, an employee will be considered to have returned to work if he or she returns to work for at least 30 calendar days, or if he or she retires at the end of the FMLA leave period or within 30 days thereafter.

Upon return from FMLA leave, most employees must be restored to their original or equivalent positions with equivalent pay, benefits, and other employment terms except as otherwise permitted under applicable law.

The use of FMLA leave cannot result in the loss of any employment benefits that accrued prior to the start of an employee’s leave.

### **Definition of Serious Health Condition**

A serious health condition is an illness, injury, impairment, or physical or mental condition that involves either an overnight stay in a medical care facility, or continuing treatment by a health care provider for a condition that either prevents the employee from performing the functions of the employee’s job, or prevents the qualified family member from participating in school or other daily activities.

Subject to certain conditions, the continuing treatment requirement may be met by a period of incapacity of more than three (3) consecutive calendar days combined with at least two visits to a health care provider or one visit and a regimen of continuing treatment, or incapacity due to pregnancy, or incapacity due to a chronic condition. Other conditions may meet the definition of continuing treatment.

### **Use of Leave**

An employee does not need to use this leave entitlement in one block. Leave can be taken intermittently or on a reduced leave schedule when medically necessary. Employees must make reasonable efforts to schedule leave for planned medical treatment so as not to unduly disrupt Market Street Talent’s operations. Leave due to qualifying exigencies may also be taken on an intermittent basis.

### **Employee Responsibilities**

Employees must provide thirty (30) days' advance notice of the need to take FMLA leave when the need is foreseeable. When thirty (30) days' notice is not possible, the employee must provide notice as soon as practicable and generally must comply with Market Street Talent's normal call-in procedures.

Employees must provide sufficient information for Market Street Talent to determine if the leave may qualify for FMLA protection and the anticipated timing and duration of the leave. Sufficient information may include that the employee is unable to perform job functions; the family member is unable to perform daily activities, the need for hospitalization or continuing treatment by a health care provider, or circumstances supporting the need for military family leave. Employees also must inform Market Street Talent if the requested leave is for a reason for which FMLA leave was previously taken or certified. Employees may also be required to provide medical certification and periodic recertification supporting the need for leave.

### **Employer Responsibilities**

Market Street Talent will inform employees requesting leave whether they are eligible under the FMLA. If they are, the notice must specify any additional information required as well as the employees' rights and responsibilities. If they are not eligible, the employer must provide a reason for ineligibility.

Market Street Talent will inform employees if leave is designated as FMLA-protected and the amount of leave counted against the employee's leave entitlement. If Market Street Talent determines that the leave is not FMLA-protected, it will notify the employee.

### **Unlawful Acts by Employers**

FMLA makes it unlawful for Market Street Talent to:

- Interfere with, restrain, or deny the exercise of any right provided under the FMLA;
- Discharge or discriminate against any person for opposing any practice made unlawful by the FMLA or for involvement in any proceeding under or relating to the FMLA.

Concerns regarding a possible violation with respect to either of these obligations should be reported to the Market Street Talent's Human Resources Department.

## **Enforcement**

Employees may file a complaint with the U.S. Department of Labor or may bring a private lawsuit against an employer.

FMLA does not affect any Federal or State law prohibiting discrimination, or supersede any State or local law or collective bargaining agreement, which provides greater family or medical leave rights.

## **MASSACHUSETTS EARNED PAID SICK TIME**

### **Eligibility**

The Company provides earned sick time to employees whose primary place of work is in Massachusetts. This policy applies to employees of the Company whose primary place of work is Massachusetts.

### **Accrual**

Employees begin accruing earned sick time at the start of employment. Eligible employees will accrue one (1) hour of earned sick time for every thirty (30) hours worked, up to a maximum accrual of forty (40) hours each calendar year. Exempt employees are assumed to work forty (40) hours in each workweek unless their normal workweek is less than forty (40) hours, in which case sick time accrues based upon that normal workweek. For purposes of this policy, the calendar year is the consecutive 12-month period beginning January 1<sup>st</sup> and ending on December 31<sup>st</sup>.

### **Usage**

Employees who have been employed for at least 90 days may use earned sick time as it accrues. Employees who have been employed for less than 90 days may begin using accrued earned sick time on the 90<sup>th</sup> day of employment. The smallest amount of earned sick time an employee can use is one (1) hour. For uses beyond one hour, employees may use earned sick time in hourly increments or in the smallest increment the Company's payroll system uses to account for absences or use of other time. An employee may not use more than forty (40) hours of earned sick time in any calendar year.

Employees may use earned sick time for the following reasons:

- 1) to care for the employee's child (which includes a biological, adopted, or foster child, stepchild, legal ward, or child of a person standing in loco parentis), spouse (as defined by the marriage laws of the Commonwealth of Massachusetts, which includes a partner in a same-sex marriage), parent, or parent of a spouse, who is suffering from a physical or mental illness, injury, or medical condition that requires home care, professional medical diagnosis or care, or preventative medical care;
- 2) to care for the employee's own physical or mental illness, injury, or medical condition that requires home care, professional medical diagnosis or care, or preventative medical care;
- 3) to attend the employee's routine medical appointment or a routine medical appointment for the employee's child, spouse, parent, or parent of spouse;
- 4) for travel to and from an appointment, a pharmacy, or other location related to the purpose for which earned sick time was taken; or
- 5) to address the psychological, physical or legal effects of domestic violence.

Earned sick time may not be used as an excuse to be late for work if the lateness is not related to one of the reasons described above. Additionally, employees may not accept a specific shift assignment with the intention of calling out sick for all or part of the shift.

To the extent permitted by applicable law, use of earned sick time may run concurrently with time off provided under the FMLA, the Massachusetts Parental Leave Act, the Massachusetts Domestic Violence Leave Act, the Massachusetts Small Necessities Leave Act, or time off pursuant to any other applicable law and to the extent permitted by applicable law.

Employees will not accrue earned sick time during an unpaid leave of absence.

### **Notice and Documentation**

Employees must comply with the Company's attendance and call-in policy when providing notice. Employees must make a good faith effort to provide notice of this need to use earned sick time if the need is foreseeable. Specifically, if an employee's need for the use of earned sick time is due to a pre-scheduled or foreseeable absence, seven (7) days advance notice to your manager or Jennifer Gray is required, except when the employee learns of the need for use of sick time within a shorter period. If an employee anticipates a multi-day absence from work, employees must provide notification of the expected duration of the leave, or, if unknown, must provide notification on a daily basis, unless the circumstances make such notice unreasonable. If an employee's need for the use of earned sick time is unforeseeable, notice must be provided as soon as is practicable under the circumstances. Under the circumstances of a particular instance, if the employee cannot reasonably provide notice, it can be provided by the employee's surrogate (e.g. spouse, adult family member or other responsible party).

When providing notice or reporting an absence for a covered purpose, employees are not required to explicitly reference earned sick time, but the Company may, in accordance with applicable laws regarding privacy and confidentiality of medical information, review with employees the covered purposes for which earned sick time may be used.

For any earned sick time used, employees must verify in writing that they have used the time for a covered reason, but will not be required to explain the nature of the illness or the details of the domestic violence.

The Company may also require supporting documentation if an employee's use of earned sick time:

- 1) covers more than twenty-four (24) consecutively scheduled work hours or three (3) consecutive scheduled work days;
- 2) occurs within two (2) weeks prior to an employee's final scheduled day of work before termination of employment, except in the case of temporary employees;
- 3) occurs after three (3) unforeseeable and undocumented absences within a three (3) month period for employees aged 17 and under; or
- 4) occurs after four (4) unforeseeable and undocumented absences within a three (3) month period for all other employees.

Documentation signed by a health care provider indicating the need for earned sick time taken constitutes acceptable certification for sick time taken for reasons 1 through 4 set forth in the Usage section above, except employees who do not have health care covered through a private insurer, the MA Healthcare Connector and related insurers may provide a signed, written statement evidencing the need for the use of the earned sick time, without being required to explain the nature of the illness, in lieu of documentation by a health care provider. Acceptable

documentation for earned sick time taken for reason 5 of the Usage section above can include: (1) a restraining order or other documentation of equitable relief issued by a court of competent jurisdiction; (2) a police record documenting the abuse; (3) documentation that the perpetrator of the abuse has been convicted of one or more offenses where the victim was a family or household member; (4) medical documentation of the abuse; (5) a statement provided by a counselor, social worker, health worker, member of the clergy, shelter worker, legal advocate or other professional who has assisted the individual in addressing the effects of the abuse on the individual or the individual's family; or (6) a sworn statement from the individual attesting to the abuse. The Company will not require that the documentation explain the nature of the illness or the details of the domestic violence. Documentation can be submitted in person or by another reasonable method, including email.

Documentation must be provided within seven (7) days of an employee taking earned sick time, unless, for good cause shown or as otherwise permitted by the Company, an employee requires more time to provide such documentation. Failure to comply with the Company's reasonable documentation requirements, without a reasonable justification, may result in the Company recouping the amount paid for earned sick time from future pay, as an overpayment, or otherwise taking appropriate action, to the extent permitted by applicable law.

The Company may require employees to provide a fitness-for-duty certification, a work release, or other documentation from a medical provider before returning to work after an absence during which earned sick time was used.

### **Payment**

Earned sick time will be paid at the same hourly rate as the employee earns from his or her employment at the time the employee uses such time. Use of sick time is not considered hours worked for purposes of calculating overtime.

### **Carryover & Payout**

Up to forty (40) hours of accrued, unused earned sick time under this policy can be carried over to the following calendar year, but employees are subject to an accrual cap of forty (40) hours, which includes amounts carried over. Once the accrual cap is reached, earned sick time will stop accruing until some earned sick time is used, at which point accrual will resume, subject to the maximum annual accrual of forty (40) hours. Accrued but unused earned sick time under this policy will not be paid at separation.

### **Enforcement & Retaliation**

Employees may be subject to disciplinary action for misuse of earned sick time if they are engaging in fraud or abuse of benefits available under this policy.

The Company will not tolerate retaliation against an employee who opposes practices that he or she believes to be in violation of earned sick time law or because the employee supports the exercise of rights of another employee under the earned sick time law. Employees with questions regarding this policy should contact Jennifer Gray.



## 901 Substance and Abuse

Market Street Talent is committed to providing its employees with a safe and productive work environment. In keeping with this commitment, it maintains a strict policy against the use of alcohol and the unlawful use of drugs in the workplace. Consequently, no employee may consume or possess alcohol, or use, possess, sell, purchase or transfer illegal drugs at any time while on Market Street Talent's premises or while using Market Street talent's vehicles or equipment, or at any location during work time.

No employee may report to work with illegal drugs (or their metabolites) or alcohol in his or her bodily system. The only exception to this rule is that employees may engage in moderate consumption of alcohol that may be served and/or consumed as part of an authorized Market Street Talent social or business event. "Illegal drug" means any drug that is not legally obtainable or that is legally obtainable but has not been legally obtained. It includes prescription drugs not being used for prescribed purposes or by the person to whom it is prescribed or in prescribed amounts. It also includes any substance a person holds out to another as an illegal drug.

Any violation of this policy will result in disciplinary action, up to and including termination.

Any employee who feels he or she has developed an addiction to, dependence upon, or problem with alcohol or drugs, legal or illegal, is strongly encouraged to seek assistance before a violation of this policy occurs. Any employee who requests time off to participate in a rehabilitation program will be reasonably accommodated. However, employees may not avoid disciplinary action, up to and including termination, by entering a rehabilitation program after a violation of this policy is suspected or discovered.

## **Market Street Talent's Antiharassment Policy and Complaint Procedure**

Market Street Talent is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, Market Street Talent expects that all relationships will be business-like and free of bias, prejudice and harassment.

It is the policy of Market Street Talent to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, religion, gender, sexual orientation, gender identity, national origin, age, disability, genetic information, marital status, pregnancy, or status as a covered veteran. Market Street Talent prohibits any such discrimination or harassment.

Market Street Talent encourages reporting of all perceived incidents of discrimination or harassment. It is the policy of Market Street Talent to promptly and thoroughly investigate such reports. Market Street Talent prohibits retaliation against any individual who reports discrimination or harassment or who participates in an investigation of such reports.

### **Definitions of Harassment**

Sexual harassment constitutes discrimination and is illegal under federal and state laws. For the purposes of this policy, sexual harassment is defined, as in the Equal Employment Opportunity Commission Guidelines, as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example a) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; b) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or c) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment may include a range of subtle and not-so-subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering, whistling or touching; insulting or obscene comments or gestures; display in the workplace of sexually suggestive objects or pictures; and other physical, verbal or visual conduct of a sexual nature.

Harassment on the basis of any other protected characteristic is also strictly prohibited. Under this policy, harassment is verbal, written or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her race, color, religion, gender, sexual orientation, national origin, age, disability, marital status, citizenship, genetic information or any other characteristic protected by law or that of his/her relatives, friends or associates, and that a) has the purpose or effect of creating an intimidating, hostile or offensive work environment; b) has the purpose or effect of unreasonably interfering with an individual's work performance; or c) otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group and that is placed on walls or elsewhere on the employer's premises or circulated in the workplace, on company time or using company equipment via e-mail, phone (including voice messages), text messages, tweets, blogs, social networking sites or other means.

### **Individuals and Conduct Covered**

These policies apply to all applicants and employees, whether related to conduct engaged in by fellow employees or someone not directly connected to Market Street Talent (e.g., an outside vendor, consultant or customer).

Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

### **Complaint Process**

Individuals who believe they have been the victims of conduct prohibited by this policy statement or who believe they have witnessed such conduct should discuss their concerns with Jennifer Gray. Individuals may also contact our human resources consultants, Spectrum Consulting, at 866-533-3947 or [susannah@spectrum.consulting](mailto:susannah@spectrum.consulting).

When possible, Market Street Talent encourages individuals who believe they are being subjected to such conduct to promptly advise the offender that his or her behavior is unwelcome and request that it be discontinued. Often this action alone will resolve the problem. Market Street Talent recognizes, however, that an individual may prefer to pursue the matter through complaint procedures.

Market Street Talent encourages the prompt reporting of complaints or concerns so that rapid and constructive action can be taken before relationships become irreparably strained. Therefore, although no fixed reporting period has been established, early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment.

Any reported allegations of harassment, discrimination or retaliation will be investigated promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge.

Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action.

Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action. Acts of retaliation should be reported immediately and will be promptly investigated and addressed. Misconduct constituting harassment, discrimination or retaliation will be dealt with appropriately.

False and malicious complaints of harassment, discrimination or retaliation may be the subject of appropriate disciplinary action.