

LOYOLA ENTERPRISES, INC.

POLICIES & PROCEDURES

CLASSIFICATION: Employment Practices

Number: I-1

Effective Date: 06-17-98

SUBJECT: Equal Employment Opportunity

Revision Date: 12-8-14

LOYOLA is committed to selecting and hiring the best and most qualified persons and provides an environment free from discrimination against applicants or employees based on race, color, national origin, religion, sex, sexual orientation, gender identity, age, disability, or any other protected class as established by law.

LOYOLA complies with applicable state and local laws governing non-discrimination in employment in every location in which the company has facilities.

This policy of Equal Employment Opportunity applies to all terms and conditions of employment, including but not limited to, hiring, promotion, demotion, benefits, termination, layoff, transfer, leave of absence, selection for training (including apprenticeships) and compensation.

The Human Resources Department has overall responsibility for this policy and maintains reporting and monitoring procedures. Any questions or concerns should be referred to the Human Resources Manager.

Appropriate disciplinary action will be taken against any employee violating this policy.

LOYOLA ENTERPRISES, INC.

POLICIES & PROCEDURES

CLASSIFICATION: Employment Practices

Number: I-2

Effective Date: 08-28-00

SUBJECT: Americans with Disabilities Act (ADA) Statement

Revision Date: 07-09-09

LOYOLA is committed to complying with all applicable provisions of the Americans with Disabilities Act (ADA). It is the Company's policy not to discriminate against any qualified employee or applicant with regard to any terms or conditions of employment because of such individual's disability or perceived disability so long as the employee can perform the essential functions of the job. Consistent with this policy of nondiscrimination, the Company will provide reasonable accommodations to a qualified individual with a disability, as defined by the ADA, who has made the Company aware of his or her disability, provided that such accommodation does not constitute an undue hardship on the Company.

An employee with a disability who believes that he/she needs a reasonable accommodation to perform the essential functions of his/her job should contact the Human Resources Department. LOYOLA encourages individuals with disabilities to come forward and request reasonable accommodation.

Procedure for Requesting an Accommodation

On receipt of an accommodation request, the Human Resources Manager and the employee's supervisor will meet with the employee to discuss and identify the precise limitations resulting from the disability and the potential accommodation that LOYOLA might make to help overcome those limitations.

LOYOLA will determine the feasibility of the requested accommodation considering various factors, including, but not limited to the nature and cost of the accommodation, LOYOLA'S overall financial resources and organization, and the accommodation's impact on the operation of the Company, including its impact on the ability of other employees to perform their duties and on LOYOLA'S ability to conduct business.

LOYOLA will inform the employee of its decision on the accommodation request. If the accommodation request is denied, the employee will be advised on his/her right to appeal the decision by submitting a written statement explaining the reasons for the request. If the request on appeal is denied, that decision is final.

The ADA does not require LOYOLA to make the "best" possible accommodation, to reallocate essential job functions, or to provide personal use items (i.e., eyeglasses, hearing aids, wheelchairs, etc.).

An employee or job applicant who has questions regarding this policy or believes that he or she has been discriminated against based on a disability should notify the Human Resources Department. All such inquiries or complaints will be investigated and treated as confidential to the extent permissible by law.

LOYOLA ENTERPRISES, INC.

POLICIES & PROCEDURES

CLASSIFICATION: Employment Practices

Number: I-3

Effective Date: 06-17-98

SUBJECT: Non-Discrimination and Anti-Harassment

Revision Date: 07-09-09

LOYOLA 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 discriminatory practices, including harassment. Therefore, LOYOLA expects that all relationships among persons in the workplace will be business-like and free of bias, prejudice, and harassment.

Equal Employment Opportunity

It is the policy of LOYOLA to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, national origin, religion, sex, age, disability, or any other classification protected by law. LOYOLA prohibits and will not tolerate any such discrimination or harassment.

Definitions of Harassment

- a. Sexual harassment constitutes discrimination and is illegal under federal, state, and local laws. For the purpose 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: (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, 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, but are not limited to: 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, catcalls or touching; insulting or obscene comments or gestures; display or circulation in the workplace of sexually suggestive objects or pictures; and other physical, verbal or visual conduct of a sexual nature. Sex-based harassment, which is harassment that does not involve sexual activity or language (i.e., male manager yells only at female employees and not males), may also constitute discrimination if it is severe or pervasive and directed at employees because of their sex.

- b. Harassment on the basis of any other protected classification is also strictly prohibited. Under this policy, harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her race, color, religion, national origin, age, disability, or any other classification protected by law or that of his/her relatives, friends, or associates, and that:

- (1) has the purpose or effect of creating an intimidating, hostile or offensive work environment;
- (2) has the purpose or effect of unreasonably interfering with an individual's work performance; or
- (3) otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes, but is not limited to: epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes and display or circulation in the workplace of written or graphic material that denigrates or shows hostility or aversion toward an individual or group.

Individuals and Conduct Covered

These policies apply to all applicants and employees, and prohibit harassment, discrimination and retaliation whether engaged in by fellow employees, by a supervisor or manager or by someone not directly connected to LOYOLA (i.e., 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.

Retaliation Is Prohibited

LOYOLA prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports. 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.

Reporting an Incident of Harassment, Discrimination, or Retaliation

LOYOLA strongly urges the reporting of all incidents of discrimination, harassment or retaliation, regardless of the offender's identity or position. Individuals who believe they have experienced conduct that they believe is contrary to LOYOLA'S policy or who have concerns about such matters should file their complaints with their immediate supervisor, the Human Resources Manager, the Executive Vice President, or the President of LOYOLA before the conduct becomes severe or pervasive. Individuals should not feel obligated to file their complaints with their immediate supervisor first before bringing the matter to the attention of one of the other LOYOLA designated representatives identified above.

In addition, LOYOLA encourages individuals who believe they are being subjected to such conduct to promptly inform the offender that his or her behavior is unwelcome and request that it be discontinued.

IMPORTANT NOTICE TO ALL EMPLOYEES:

Employees who have experienced conduct they believe is contrary to this policy have an obligation to take advantage of this complaint procedure. An employee's failure to fulfill this obligation could affect his or her rights in pursuing legal action.

Also note that federal, state, and local discrimination laws establish specific time frames for initiating a legal proceeding pursuant to those laws.

Early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment. Therefore, while no fixed reporting period has been established, LOYOLA strongly urges the prompt reporting of complaints or concerns so that rapid and constructive action can be taken. LOYOLA will make every effort to stop alleged harassment before it becomes severe or pervasive, but can only do so with the cooperation of its employees.

False and malicious complaints of harassment, discrimination, or retaliation as opposed to complaints which even if erroneous, are made in good faith, may be subject to appropriate disciplinary action.

The availability of this complaint procedure does not preclude individuals who believe they are being subjected to harassing conduct from promptly advising the offender that his or her behavior is unwelcome and requesting that it be discontinued.

The Investigation

Any reported allegations of harassment, discrimination or retaliation will be investigated promptly, thoroughly and impartially. 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. Individuals are required to participate in the investigation and to be truthful.

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

Responsive Action

Misconduct constituting harassment, discrimination or retaliation will be dealt with promptly and appropriately. Responsive action may include, but is not limited to, training, referral to counseling, monitoring of the offender and/or disciplinary action such as warning, reprimand, withholding of a promotion or pay increase, demotion, reassignment, temporary suspension without pay or termination, as LOYOLA deems appropriate under the circumstances.

If an employee making a complaint does not agree with its resolution, the employee may appeal to the President of LOYOLA.

Individuals who have questions or concerns about these policies should contact the Human Resources Manager.

Finally, these policies should not, and may not, be used as a basis for excluding or separating individuals of a particular gender, or any other protected characteristic, from participating in business or work related social activities or discussions in order to avoid allegations of harassment. The law and the policies of LOYOLA prohibit disparate treatment on the basis of sex or any other protected characteristic, with regard to terms, conditions, privileges and prerequisites of employment. The prohibitions against harassment, discrimination and retaliation are intended to complement and further these policies, not to form the basis of an exception to them.

LOYOLA ENTERPRISES, INC.

POLICIES & PROCEDURES

CLASSIFICATION: Employment Practices

Number: I-4

SUBJECT: Affirmative Action

Effective Date: 08-28-00

Revision Date: 07-09-09

LOYOLA firmly supports the concept of equal opportunity for all and takes active steps to promote employment and advancement of the disabled. This philosophy is a reflection of the personal convictions of LOYOLA's executive management and has been given full expression in the Company's Affirmative Action Plans (AAP) throughout the Company's history. The AAP's express affirmative action in employing, training, developing, and promoting employees of "protected classes" for all people who have in the past suffered from the intentional or unintentional imposition of constraints against their employment and advancement in American business and industry.

The following are brief definitions of the legally accepted protected classes.

Minorities - Specific minority groups are designated by statute as those deserving of special protection under the law. Persons generally considered to be, or who identify themselves to be, parts of a given minority community are considered to fall within that particular protected class. The racial/ethnic protected groups are (USGPO 1980-326-321):

- Black or African American (not of Hispanic origin) - All persons having origins in any of the black racial groups of Africa.
- Hispanic or Latino - All persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.
- Asian - All persons having origins in any of the original Peoples of the Far East, Southeast Asia, and the Indian Subcontinent.
- Native Hawaiian or other Pacific Islander – All person having origins in any of the Peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- American Indian or Alaskan Native - All persons having origins in any of the original Peoples of North and South America, and who maintain cultural identification through tribal affiliations or community attachment.

Women - All women are included as a protected class by virtue of the socially imposed positions or salaries in the business and professional world.

Disabled Veterans and Vietnam Era Veterans

- Disabled veterans are those entitled to disability compensation, under laws administered by the Veterans Administration, by the virtue of a disability established as 30% or more or because of discharge or release from active duty for a disability incurred or aggravated in the line of duty.
- Vietnam era veterans are those who served on active duty for a period of more than 180 days, any part of which occurred between August 5, 1964 and May 7, 1975, and who were discharged or released from active duty with other than a dishonorable discharge.

Protected Classes

Certain minority groups have historically been victims of discrimination in employment and in other basic aspects of their relationships with American society. In order to put an end to the effects of this historic discrimination and to rectify wrongs inflicted over the centuries, the U.S. Government has required establishment of the Affirmative Action Program Plans within American businesses. These plans, which map out positive actions and set goals for employment and promotion of the affected minority groups, have the full support of LOYOLA management. It is the conviction of all the officials of the Company that everyone is unique, that people cannot and should not be judged and characterized in broad racial and ethnic groupings, but only individually. This recognition of the individual character and worth of each person is a moral and ethical obligation of everyone who represents the Company.

The same philosophy as that expressed above, applies equally to women in the workplace. Not only should women be employed on the basis of individual capability, but their status and salary should reflect their contributions to the Company at the same rate that those contributions would be rewarded if the employees were men.

The Americans with Disabilities Act (ADA), although not strictly an Affirmative Action Program, makes discrimination against disabled persons illegal. The ADA requires employers to "level the playing field" for disabled persons.

The men and women who have served in our armed forces have contributed significantly to the preservation of our nation. In order to minimize the injurious impact of wartime military service on these men and women, the Government enacted the Vietnam Era Veterans Readjustment Assistance Act of 1974. The purpose of the act is to ensure that Government contractors take affirmative action to employ and advance in employment qualified disabled veterans and veterans of the Vietnam era. It is essential that all managers and supervisors be aware of LOYOLA's commitment to affirmative action for qualified disabled veterans and veterans of the Vietnam era in their personnel actions. Full cooperation from each employee in implementing this program is expected.

Responsibility

The Human Resource Manager serves as the Director of Equal Employment Opportunity and is responsible for formulating, implementing, coordinating, and monitoring all efforts. The Human Resource Manager reports directly to the President and has complete support in implementing and monitoring the corporate-wide Affirmative Action Program.

It is the responsibility of each supervisor, manager, and executive to support and, if necessary, to enforce the provisions of this policy. All company officials are encouraged to suggest ways to improve the Company's performance in Equal Opportunity and Affirmative Action.

All employees are expected to support and comply with the Company's Equal Opportunity Affirmative Action Policy.

LOYOLA ENTERPRISES, INC.

POLICIES & PROCEDURES

CLASSIFICATION: Employment Practices

Number: I-5

SUBJECT: Social Security Number

Effective Date: 07-09-09

Revision Date:

It is the policy of LOYOLA to protect the confidentiality of social security numbers obtained and used in the course of business from its employees. All executives, managers, and employees are expected to adhere to this policy. Any employee violating the provisions of this policy will be disciplined up to and including termination.

Collection of Social Security Numbers

Social security numbers will be collected from employees as required in order to meet federal and/or state and Company reporting requirements. These purposes include but are not limited to:

- conduct employment background checks
- conduct driving record history checks
- verify eligibility for employment
- withhold federal and state taxes from payroll
- comply with state new-hiring reporting
- facilitate enrollment in benefit plans
- facilitate coverage for automobile insurance

Social security numbers may also be collected from independent contractors who do not have an employer identification number (EIN). Social security numbers obtained from independent contractors will be subject to the same provisions of this policy as those for employees.

Use of Social Security Numbers

With the exception of the above-referenced reasons, no social security number will be used to conduct Company business. Social security numbers will not be used for the following purposes: identification badges, timesheets, employee roster, employee identification records, computer passwords, Company account records, licenses, agreements or contracts.

Social security numbers will not be used in open computer transmissions, Company distributions, or through the Company intranet except where such transmission of information is by secure connection or is encrypted.

Storage and Access to Social Security Numbers

All documents containing social security numbers will be stored in locked secured areas. All computer applications containing social security numbers will be maintained on authorized-access computer stations only.

Only persons who have a legitimate business reason will have access to social security numbers. Those granted access must take all necessary precautions to ensure the integrity of records at all times.

Destruction of Social Security Numbers

Records that include social security numbers will be maintained in accordance with federal and state laws. When the retention period has expired and such documents are released for destruction, the records will be destroyed by shredding.

LOYOLA ENTERPRISES, INC.

POLICIES & PROCEDURES

CLASSIFICATION: Employment Practices

Number: I-6

Effective Date: 06-17-98

SUBJECT: Drug-Free Workplace/Workforce

Revision Date: 07-09-09

It is LOYOLA'S objective to ensure that all LOYOLA entities maintain a drug-free workplace and workforce. The unlawful manufacture, distribution, dispensing, possession or use of controlled substances by employees on LOYOLA or assigned premises is prohibited. Offenders of this policy will be subject to Company sanctions, up to and including termination.

As a Federal contractor, LOYOLA complies with contractual obligations based on various laws and regulations. This policy and its implementing procedures serve to define and direct fulfillment of these obligations as they relate to the maintenance of a drug-free workplace and workforce.

LOYOLA recognizes the destructive effects in the workplace of unlawful controlled substances and their use by employees. In promulgating this drug-free workplace/workforce policy, LOYOLA affirms its conviction that the program will be cost-effective and beneficial for the Company as a whole.

DRUG-FREE WORKPLACE NOTE: THIS PROCEDURE APPLIES TO ALL LOYOLA PERSONNEL NOT WORKING IN SENSITIVE POSITIONS.

PURPOSE: To provide instructions for implementing LOYOLA policy, in support of Public Law 100-440, which requires government contractors to maintain a Drug-Free Workplace.

APPLICABILITY: This procedure applies to all personnel of LOYOLA at all levels, as well as to subcontractors, Labor Hour Contractors, independent consultant service providers, and temporary employees working at LOYOLA facilities.

RESPONSIBILITY:

- A. Executives, managers, and supervisors are responsible for ensuring that this procedure is carried out in their respective areas of authority.
- B. Every employee is responsible for his/her own adherence to the provisions of this Policy/Procedure.
- C. The Human Resources Department is responsible for review and approval/disapproval of employee assistance arrangements at all locations.

PROCEDURE:

- A. Condition of Employment. Each employee must certify his/her understanding of this Policy and Procedure by signing the "Drug Awareness Policy Statement". (See Attached). The signer undertakes to:
 - 1. Abide by the provisions of this Policy and Procedure.
 - 2. Apprise his/her supervisor (immediate supervisor or another higher level supervisor in the same line of supervision) of any suspected or known infractions of this procedure.

3. Respect the confidentiality of information learned concerning drug testing of other persons.
 4. If convicted of a drug offense, inform his/her supervisor or the Human Resource Department within five days.
- B. Counseling Resource for Employees. Employees in need of counseling and who are enrolled under LOYOLA'S health insurance should contact the customer service department of the health insurance company to be referred to the appropriate mental health provider.
1. Self referral. An employee who perceives that he/she has drug abuse problems may make personal arrangements for a consultation. As necessary, the counselors, who are independent of LOYOLA, may make referrals for assistance which may or may not be covered under group health insurance. If not covered, payment for further required assistance is the responsibility of the employee. The counselor will keep this information in confidence; no notification will be given to LOYOLA, except for periodic reports showing number and type of services provided.
 2. Company referral. If a supervisor/manager perceives a possible drug problem, he/she must immediately notify the appropriate Company officer. Information must be limited to local line managers with need to know. This official, if in agreement that there is adequate reason to suspect a drug problem, will consult with the Human Resource Department about intervention with the employee. Supervisors will be trained in drug symptom recognition. Intervention may be handled by the Human Resource Department or a designee. The employee will be informed that:
 - The Company is concerned about an apparent problem which is interfering with his/her performance.
 - The Company recommends counseling and positive action to correct the problem.
 - The Company requires, as a condition of continued employment, that the employee contact the LOYOLA Health Insurance representative to make further arrangements for counseling and referral to treatment if necessary.
 - If the employee fails to accept counseling or take corrective action within a specified time, his employment will be at risk. The intervening official should leave no doubt that termination is a probable outcome if the problem continues uncorrected.
 3. Disciplinary Action vs. Employee Assistance. Referral to the Employee Assistance Program should not be made in lieu of regular disciplinary action. Violations of Company policies including the Ethics Policy must continue to be dealt with in the usual manner. Further details about the Employee Assistance Program are available separately.
- C. Sanctions.
1. Termination. The employee may be terminated in, at least, the following circumstances:
 - Confirmed drug abuse and refusal to accept counseling or seek rehabilitation.
 - Failure to be rehabilitated after a reasonable period of assistance and suspension.
 - Manufacture of drugs or drug trafficking, possession or use of illegal drugs on Company premises.
 - Conviction of a drug offense, whether the offense occurred on Company premises or elsewhere.
 2. Notification to Employer. If an employee is convicted of a criminal drug offense, the employee is required by law to inform the employer within 5 days.
- D. Non-LOYOLA Personnel. While independent contractors or sales/service vendors are operating on LOYOLA premises, they are subject to compliance with provisions of this Policy and Procedure.

If they are found in violation, they may be escorted from the Company's premises and denied entrance in the future.

- E. Employees at non-LOYOLA locations. LOYOLA employees working at non-LOYOLA locations are subject to the provisions of this Policy and Procedure and are expected to also comply with related regulations at the host site, whether it is that of a customer or another company with which LOYOLA has a business relationship.
- F. Training of Personnel.
 - 1. All employees will be notified of this Policy and Procedure and copies will be made available for required review.
 - 2. Supervisors and managers will be apprised of their responsibilities and will be trained or briefed by the Human Resource Department on the content of this procedure and on recognition of symptoms of drug abuse.
 - 3. Management and supervisory personnel will brief employees as necessary on the hazards and likely employment consequences of drug abuse. Employees will be further apprised of the hazards of drug use by occasional memorandums, written notice, and articles in company newsletters.

DRUG-FREE WORKFORCE NOTE: THIS PROCEDURE APPLIES TO ALL LOYOLA PERSONNEL WORKING IN SENSITIVE POSITIONS UNDER DOD CONTRACTS.

PURPOSE: To provide instructions for implementing LOYOLA policy, in support of DoD interim rule, 48CFR, Parts 223 and 252, 28 Sept 1988 (Drug-Free Workplace.)

APPLICABILITY: This procedure applies to Personnel with DoD clearances and those working in other positions designated "sensitive."

RESPONSIBILITY:

- A. Executives, managers, and supervisors are responsible for ensuring that this procedure is carried out in their respective areas of authority.
- B. Each employee in a "sensitive" position or with a DoD clearance is responsible for his/her own adherence to the provisions of this Policy and Procedure.
- C. The Human Resources Department is responsible for review and approval/disapproval of employee assistance arrangements at all locations.

PROCEDURE:

- A. Conditions of Employment. Each employee must certify his/her understanding of this Policy and Procedure by signing the "Drug Awareness Policy Statement". (See Attached) The same applies to each Labor Hour Contractor and independent consultant. The signer undertakes to:
 - 1. Abide by the provisions of this Policy and Procedure.
 - 2. Appraise his/her supervisor (immediate supervisor or another high level supervisor in the same line of supervision) of any suspected or known infraction of this procedure.
 - 3. If directed, submit to drug testing by a certified laboratory in compliance with this procedure and applicable law.
 - 4. Respect the confidentiality of information learned concerning drug testing of other persons.

5. If convicted of a drug offense, inform his/her supervisor or the Director of Human Resources within five (5) days.
- B. Drug Tests. DoD Interim Rule, September 1988, Sub-part 52.223-7500, Drug-Free Workforce, states in part: The Contractor shall establish a program that provides for testing of any use of illegal drugs by employees in the sensitive positions. (Pre-employment testing is permitted at the discretion of the employer.)
1. Pre-employment testing. If directed, new employees may be required to undergo drug testing as a condition of employment.
 2. Random testing. At the discretion of LOYOLA management, random testing may be directed for specific facilities or all locations.
 3. Specific Testing. Testing of designated individuals may be directed upon reasonable suspicion of drug use or as follow-up to counseling or rehabilitation for illegal drug use.
 4. Refusal to submit to a required drug test, or refusal to certify willingness to comply with the LOYOLA Drug-Free Policy, depending upon the circumstances, may be grounds for dismissal, since assignment of some tasks could be precluded and this would nullify LOYOLA'S ability to certify a drug-free workplace and workforce as required by law.
 5. Drug Testing Process:
 - a. Drug Testing will be coordinated by the Human Resource Department. In no event will employees be tested without prior knowledge and consent of the President.
 - b. Arrangements have been made with two laboratories approved by the National Institute on Drug Abuse (NIDA) to conduct urine specimen testing for LOYOLA. The primary testing facility will be conducted at a LOYOLA approved lab.
 - c. Urine specimens will be produced in private under controlled conditions (direct observation is not required), either at approved laboratories or collection points.
 - d. Procedures will ensure that the employee remains present to witness the sealing of the specimen container and cosigns the seal. Reliable chain-of-custody documentation hereafter will be ensured and certified by the collection agency and the laboratory.
 - e. Results of laboratory tests will be submitted only to the Human Resource Department, which will maintain confidentiality, releasing data only to the tested employee and the responsible manager with need to know basis.
 - f. Any persons at any level, with knowledge of test results are advised to maintain strict confidentiality concerning the subject.
 - g. Test results will not become a part of personnel records, but will be maintained in separate locked files under custody of the Human Resources Department.
 - h. Testing will be at the Company's expense. If any employee requests re-testing, such testing will be at the employee's expense unless original test results are proved to have been incorrect.
- C. Employee Assistance. Confidential employee assistance of drug abuse (and other personal or family problems) is available to employees and their families through Company provided counseling and referral service.
1. Self referral. An employee who perceives that he/she has drug abuse problems may make personal arrangements for a consultation. As necessary, the counselors, who are independent of LOYOLA, may make referrals for assistance that may or may not be covered under group health insurance. If not covered, payment for further required assistance is the responsibility of the employee. The counselor will keep this information in confidence; no notification will be given to LOYOLA, except for periodic reports showing number and type of services provided.

2. Company referral. If a supervisor/manager perceives a possible drug problem, he/she must immediately notify the appropriate Company officer. Information must be limited to local line managers with need to know. This official, if in agreement that there is adequate reason to suspect a drug problem, will consult with the Human Resource Department about intervention with the employee. Supervisors will be trained in drug symptom recognition. Intervention may be handled by the Human Resource Department or a designee. The employee may be informed that:
 - The Company is concerned about an apparent problem that is interfering with his/her performance.
 - The Company recommends counseling and positive action to correct the problem.
 - The Company requires, as a condition of continued employment, that the employee contact the LOYOLA Health Insurance representative to make further arrangements for counseling and referral to treatment if necessary.
 - If the employee fails to accept counseling or take corrective action within a specified time, his employment will be at risk. The intervening official should leave no doubt that termination is a probable outcome if the problem continues uncorrected.
3. Disciplinary Action vs. Employee Assistance. Referral to the Employee Assistance Program should not be made in lieu of regular disciplinary action. Violations of company policies including the Ethics Policy must continue to be dealt with in the usual manner. Further details about the Employee Assistance Program are available separately.

D. Sanctions.

1. Suspension/Drug Testing. If drug use is admitted or confirmed by drug testing, the employee must be removed from performance on sensitive work, and will be urged to seek rehabilitation. Depending on circumstances, the employee may use Personal Leave Time or be placed on Leave Without Pay for a period of treatment. Group insurance may cover all or part of the cost of treatment. An employee removed from sensitive work because of drug abuse will not be returned to that work until rehabilitation is confirmed and he/she is declared fit for duty.
2. Termination. The employee may be terminated in, at least, the following circumstances:
 - a. Confirmed drug abuse and refusal to accept counseling or seek rehabilitation.
 - b. Failure to be rehabilitated after a reasonable period of assistance and suspension.
 - c. Manufacture of drugs or drug trafficking, possession or use of illegal drugs on Company premises.
 - d. Conviction of a drug offense, whether the offense occurred on Company premises or elsewhere.
3. Notification of Contracting Officer and Defense Investigative Service.
 - a. If an employee has a DoD clearance, the Defense Investigative Service must be notified if drug abuse is confirmed. If there is a conviction of a drug related offense, the Contracting Officer must also be notified.
 - b. If the employee is serving in a sensitive position, he/she must be removed from the project immediately, and the appropriate Contracting Officers must be notified. The employee may not be returned to sensitive work until management determines that the employee is fit for duty.

LOYOLA ENTERPRISES, INC.

POLICIES & PROCEDURES

CLASSIFICATION: Employment Practices

Number: I-7

Effective Date: 08-28-00

SUBJECT: Code of Ethics

Revision Date: 07-09-09

LOYOLA conducts its business ethically and impartially ensuring compliance with all laws and regulations. The success of our business is dependent on the trust and confidence we earn from our employees and customers. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching Company goals solely through honorable conduct.

All employees deserve to work in an environment where they are treated with dignity and respect. LOYOLA is committed to creating such an environment because it brings out the full potential in each employee, which, in turn, contributes directly to our business success.

The highest standards of ethical conduct are required of LOYOLA employees during working hours and nonworking hours. Employees will not engage in conduct or activity that may raise question as to the Company's integrity or would cause embarrassment or reflect negatively on LOYOLA'S reputation.

Every employee has the responsibility to ask questions, seek guidance, report suspected violations, and express concerns regarding compliance with this policy to the management staff. LOYOLA will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the Company will take appropriate action. LOYOLA will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

LOYOLA ENTERPRISES, INC.

POLICIES & PROCEDURES

CLASSIFICATION: Employment Practices

Number: I-8

SUBJECT: Conflict of Interest and Outside Employment
Statement

Effective Date: 06-17-98

Revision Date: 07-09-09

General Statement

LOYOLA expects our employees to conduct business according to the highest ethical standards of conduct. Employees are expected to devote their best efforts to the interests of the Company. Business dealings that appear to create a conflict between the interests of the Company and an employee are unacceptable. The Company recognizes the right of employees to engage in activities outside of their employment which are of a private nature and unrelated to our business; however, the employee must disclose any possible conflicts so that the Company may assess and prevent potential conflicts of interest from arising.

Although it is not possible to specify every action that might create a conflict of interest, this policy sets forth the ones which most frequently present problems. If an employee has any question whether an action or proposed course of conduct would create a conflict of interest, he or she should immediately contact the Human Resources Department to obtain advice on the issue. The purpose of this policy is to protect employees from any conflict of interest that might arise.

An example of a potential or actual conflict of interest is whenever an employee is in a position to influence a decision that may result in a personal gain for the employee or an immediate family member (i.e., spouse or significant other, children, parents, siblings) as a result of the Company's business dealings.

A violation of this policy will result in immediate and appropriate discipline, up to and including immediate termination.

Outside Employment

Employees are required to notify the Human Resources Department, in writing, prior to participating in additional employment opportunities. Approval will be granted unless the activity conflicts with the Company's interest. In general, outside work activities are not allowed when they:

- prevent the employee from fully performing work for which he or she is employed at the Company, including overtime assignments;
- involve organizations that are doing or seek to do business with LOYOLA (including actual or potential vendors or customers), competitors of the Company; or
- violate provisions of law or the Company's policies or rules.

From time to time, LOYOLA employees may be required to work beyond their normally scheduled hours. Employees must perform this work when requested. In cases of conflict with any outside activity, the employee's obligations to the Company must be given priority. Employees are hired

and continue in LOYOLA'S employment with the understanding that LOYOLA is their primary employer and that other employment or commercial involvement which is in conflict with the business interests of LOYOLA is strictly prohibited.

Acceptance of Gifts

No employee may solicit or accept gifts of significant value (i.e., in excess of \$50.00), lavish entertainment or other benefits from potential and actual customers, suppliers or competitors. Special care must be taken to avoid even the impression of a conflict of interest.

Any employee may entertain potential or actual customers if such entertainment is consistent with accepted business practices, does not violate any law or generally accepted ethical standards and the public disclosure of facts will not embarrass the Company. Any questions regarding this policy should be addressed to the Human Resources Department.

Work Product Ownership

All LOYOLA employees agree that LOYOLA retains legal ownership of the product of their work. The work product is the sole and exclusive property of LOYOLA. No work product created while employed by LOYOLA can be claimed, construed, or presented as property of the individual, even after employment by LOYOLA has been terminated or the relevant project completed. This includes written and electronic documents, drawings, specifications, database files, manuals, notes, computer programs, proposals, any concepts, ideas, or other intellectual property developed for LOYOLA, regardless of whether the intellectual property is actually used by LOYOLA. Although it is acceptable for an employee to discuss a portion or the whole of a certain work product as an example in certain situations (i.e., resume, employment interview), one must bear in mind that information classified as confidential must remain so even after the end of employment, and that supplying certain other entities with certain types of information may constitute a conflict of interest.

LOYOLA ENTERPRISES, INC.

POLICIES & PROCEDURES

CLASSIFICATION: Employment Practices

Number: I-9

SUBJECT: Personnel Files

Effective Date: 06-17-98

Revision Date: 07-09-09

To ensure the privacy of personal information, personnel files are maintained in a confidential, secure manner in the Human Resources Department. All personnel files are the property of LOYOLA. The personnel files in the Human Resources Department are the official documentation with respect to all personnel transactions and supersede other files if contradictions exist.

All information maintained in an employee's personnel file is limited to information required for business or legal purposes and in accordance with Equal Employment Opportunity Laws and other state and federal regulations.

Contents of Personnel Files

Personnel files are maintained on all LOYOLA employees. Each employee file may contain the following:

- Completed Application for Employment
- Reference Checks
- Pre-employment Testing when required by job
- Certification when required by job
- Orientation Checklist
- Federal Withholding Exemption Form
- State Withholding Exemption Form
- Direct Deposit Authorization
- Three Month Evaluation
- Letters of Commendation
- Performance Counseling / Disciplinary Record
- Human Resources Status Change Form

Employee files will not contain any of the following:

- Medical History
- Medical LOA Information
- COBRA Information
- Picture Identification
- Short Term / Long Term Disability Information
- Benefits Enrollment Forms
- Garnishments
- Pension Plan Beneficiary Designation
- I9 Form
- Doctor's Notes regarding employee absence or illness
- Worker's Compensation Claims

Internal Access to Personnel Files

Access to employee files is restricted to the following individuals and may be reviewed only in the Human Resources Department.

- Human Resources employees with a business need-to-know have full access.
- Selected employees may have access to particular sets of data such as, FSA account, payroll, etc.
- The employee's immediate supervisor.
- A supervisor considering an employee for a transfer.
- Corporate officers may have access to personnel files of persons lower in rank than themselves.

Employee Access to Personnel Files

All current employees may be permitted to review their personnel file.

- The personnel file may only be reviewed in the presence of the Human Resources Manager during normal business hours. The employee must call to make an appointment. The files may not be removed from the Human Resources Department.
- Photocopying of personnel documents is not permitted.
- The employee will not be provided access to letters of reference.

Reporting Changes to an Employee's File

In order to maintain accurate and current personnel files on employees, employees must report changes in name, address, telephone number, withholding deductions, and person to contact in case of emergency.

Storage of Personnel Data

Hard copy - Personnel documents are stored in folders by individual employee's name. Folders are kept in secure files or in a secure room to prevent unauthorized access.

Computer Memory - Any computer files that contain personal data about employees or salary information is afforded all possible security. If protection against unauthorized access cannot be assured for data remaining in hardware components, which are physically located with or connected to the computer, the files will be written out to a tape or a removable disk for secure storage.

Destruction of Personnel Files

All personnel files and confidential employee data maintained by Human Resources will be destroyed by shredding after retention dates have passed. Application materials submitted by applicants for employment who were never employed will also be shredded.

Employee Health Data

If information concerning an employee's health or physical condition must be collected, i.e., to process disability claims, a separate file must be maintained with access restricted only to those employees whose job directly relate to health information. The information contained in these files can only be released with written permission of the employee or his/her authorized agent.

Requests for information concerning workers compensation cases are handled by the Human Resources Department for referral to legal counsel.

Subpoenas or requests claiming a legal basis for the information are to be handled by the Human Resources Department for referral to legal counsel.

The Human Resources Department handles questions concerning industrial accidents and/or employee work limitations.

LOYOLA ENTERPRISES, INC.

POLICIES & PROCEDURES

CLASSIFICATION: Employment Practices

Number: I-10

SUBJECT: Employee Classification

Effective Date: 08-28-00

Revision Date: 11-01-15

Based on the conditions of employment, employees of LOYOLA fall into the following classifications:

- Full-time, Part-time, Temporary
- Exempt or Non-Exempt
- Salaried or Hourly

Full-time, Part-time & Temporary Employees

Full-time employees are employees who are scheduled to work a minimum of a thirty (30) hour work week. Employees working on a contract may be an exception and will be determined on a case by case basis.

Part-time employees are employees who work an established work schedule of less than thirty (30) hours per week.

If an employee status changes from full-time to part-time, they must work on average of thirty (30) hours per week over a six (6) month period in order to be restated back to full-time.

Temporary employees are hired for a specific project or timeframe and work an irregular schedule for a limited period of time. Temporary employees in a non-exempt position are paid by the hour while a temporary worker in an exempt position is paid according to the terms of hire for that individual.

Exempt & Non-Exempt Employees

Exempt employees are classified as such if their job duties are exempt from the overtime provisions of the Federal and State Wage and Hour Laws. Exempt employees are paid a guaranteed or stated salary. The law does not require employers to pay exempt employees for overtime worked; however, under extraordinary circumstances, exempt employees working on government contracts that authorize overtime, i.e., Extended Work Week (EWW), will be paid for excessive hours worked. The overtime hours will be paid at straight time rates.

Non-exempt employees will be paid on an hourly basis. All hours worked in excess of forty (40) in a work week will be paid at time and a half as in accordance with the Fair Labor Standards Act (FLSA). All overtime worked must be approved in advance by the employee's supervisor.

LOYOLA ENTERPRISES, INC.

POLICIES & PROCEDURES

CLASSIFICATION: Employment Practices

Number: I-11

SUBJECT: Employment Procedure

Effective Date: 06-17-98

Revision Date: 07-09-09

The coordination of the recruitment and employment process is the immediate responsibility of the Human Resources Department. Applications for employment are to be made within the Human Resources Department. The Human Resources Department will retain all applications for a period of one (1) year for non-government positions and two (2) years for government positions.

Resume Review

The Human Resources Department along with the hiring authority will review applications and pre-screen potential candidates. Resumes are reviewed for qualifications which match the announced job posting. Reference checks will be made by either telephone or mail. Executive management may approve payment for travel expenses for candidates recruited out of the local area.

Job Offer

When all selected applicants have been interviewed and the hiring authority has determined the best qualified candidate, the interview process will end and a job offer can be extended. Offers of employment will be made by the Human Resources Manager or executive management.

Upon acceptance of a job offer, the Human Resources Department will immediately notify the hiring authority and prepare for the hiring process.

Salary for new hires is determined by executive management.

Use of Recruiting Agencies

LOYOLA prefers to hire new employees through corporate advertising, current employee referrals, and other recruiting activities, but in some cases find it expedient to use commercial agency recruiting services. LOYOLA will hire personnel from recruiting agencies which agree to charge the company a maximum of 10% (of the first year's salary) fee and promise a 90 day warranty. Approval from the President must be obtained prior to reviewing any resumes from agencies.

LOYOLA ENTERPRISES, INC.

POLICIES & PROCEDURES

CLASSIFICATION: Employment Practices

Number: I-12

Effective Date: 06-17-98

SUBJECT: Orientation of New Hires

Revision Date: 07-09-09

New employees will be informed of the Company policies and procedures and benefits upon employment. Familiarity with this information will allow the employees to work more effectively and promote a better employee-employer relationship.

All new employees will report to the Human Resources Department on their first day of employment. The Human Resources Manager will review the following topics with the employee:

1. New Hire Paperwork
2. Fringe Benefits Package
3. Payroll and Timesheet Processes
4. Three Month Performance Evaluation Process
5. Policies & Procedures Manual
6. Organizational Point of Contacts
7. Corporate Culture

After all the above is completed, the employee will report to his or her assigned work area. The immediate supervisor and the Human Resources Manager will be available for questions and/or concerns of the employee.

LOYOLA ENTERPRISES, INC.

POLICIES & PROCEDURES

CLASSIFICATION: Employment Practices

Number: I-13

SUBJECT: Initial Employment Period - Evaluation

Effective Date: 07-09-09

Revision Date:

Every new employee goes through an initial period of adjustment in order to learn about the Company and about his or her job. During this time the employee will have an opportunity to find out if he or she is suited to, and likes his or her new position. Additionally, the initial employment period gives the employee's supervisor a reasonable period of time to evaluate the employee's work performance and attendance.

The initial employment period is ninety (90) days. During this time, the new employee will be provided with training and guidance from the immediate supervisor and/or designated team member. The employee may be discharged at any time during this period if the supervisor concludes that the new employee is not progressing or performing satisfactorily. Under appropriate circumstances, the initial employment period may be extended. Additionally, as is true at all times during an employee's employment with the Company, employment is not for any specific time and may be terminated at will, by either the employee or the employer, with or without cause and without prior notice.

At the end of the initial employment period, the employee and the immediate supervisor will discuss the employee's performance. The supervisor will complete a Three Month Evaluation Form and make one of the following recommendations:

1. Progress is satisfactory
2. Reevaluate on a specified date
3. Termination

When the employee's progress is satisfactory, the employee will continue in LOYOLA'S employment as an at-will employee.

When the supervisor notates areas of concern relative to the employee's performance, reevaluation may be scheduled for a specified date (no later than 90 days). The time frame is based on the seriousness of the performance problem and the length of time required to improve performance.

When the supervisor deems there are performance and/or attendance problems and the employee may not be suited for the job, the supervisor must contact the Human Resources Department to discuss the specific problems. If termination is decided, either the supervisor, higher level manager in line of supervision, or the Human Resources Manager will inform the employee of the termination.

The Three Month Performance Evaluation must be discussed with the employee. Both the employee and the supervisor are required to sign the evaluation form before the supervisor forwards it to the Human Resources Department. All employees are entitled to a copy of their performance evaluation upon request.

The employee's signature indicates they have seen the form and does not necessarily indicate that they agree with its contents. If the employee refuses to sign the form, that should be so noted in the presence of a witness.

LOYOLA ENTERPRISES, INC.

POLICIES & PROCEDURES

CLASSIFICATION: Employment Practices

Number: I-15

SUBJECT: Reference Checks

Effective Date: 06-17-98

Revision Date: 07-09-09

Pre-Employment

In our efforts to employ qualified persons at LOYOLA, all candidates for employment will be subject to a background investigation. Former employers, personal references, and educational institutions may be contacted. Falsification, omission, or misrepresentation of information will be cause for denial of employment. If falsification or omissions are discovered after employment, the employee is subject to immediate termination.

The Human Resources Department will conduct all pre-employment investigations.

Reference Requests from Outside Companies

All inquiries regarding a current or former LOYOLA employee must be referred to the Human Resources Department. Supervisors and employees are not permitted to release any information.

Should an employee receive a written request for a reference, the employee shall refer the request to the Human Resources Department for handling. LOYOLA employees are not permitted to issue a reference letter on any current or former employee.

LOYOLA employees are not permitted to release information about any current or former LOYOLA employee over the telephone. All telephone inquiries regarding a current or former employee of LOYOLA must be referred to the Human Resources Department.

In response to an outside request for information regarding a current or former LOYOLA employee, the Human Resources Department will verify or furnish only an employee's name, dates of employment, and job title. No other data or information regarding any current or former LOYOLA employee will be furnished unless LOYOLA is required by law to furnish the information.

Current employees are permitted to give a personal reference, however, the reference will not be Company endorsed. Company letterhead may not be used for personal references.

Requests for Employment Information for Employee Personal Business

In order to facilitate personal business, an employee may request the Human Resources Manager to release employment date, job title, and salary information by telephone or fax.

LOYOLA ENTERPRISES, INC.

POLICIES & PROCEDURES

CLASSIFICATION: Employment Practices

Number: I-16

SUBJECT: Transfers and Promotions

Effective Date: 06-17-98

Revision Date: 07-09-09

LOYOLA encourages employees to assume higher-level positions or lateral transfers for which they qualify. When a position becomes vacant, an email is sent to all employees with the attached job posting. The position is also posted on the Company website.

Each employee requesting a transfer will be considered for the position along with all other applicants. The employee must have a good performance and attendance record to qualify for an internal transfer. Each transfer is judged on an individual basis, depending on the needs of both areas involved.

All final decisions regarding transfers will be made by management, in conjunction with the Human Resources Department.

Process for Transfers

An employee who wishes to apply for a transfer should discuss it first with his/her immediate supervisor and the Human Resources Department so that it may be determined if his/her skills fit the requirements of the desired job.

If it is determined that the employee is qualified to apply, the employee must contact the Hiring Authority for the position, forward his/her resume along with a written request for consideration as a candidate for the vacant position.

The Hiring Authority will review the qualifications based on information from the resume, interview, latest performance evaluation, and discuss it with the current supervisor.

If the employee is selected for the position, the Hiring Authority will notify all parties concerned and complete a Status Report Form indicating job title, effective date, name of new supervisor and any salary adjustments and forward it to the Human Resources Department. The Status Report Form must be approved and signed by the President or Executive Vice President.

LOYOLA ENTERPRISES, INC.

POLICIES & PROCEDURES

CLASSIFICATION: Employment Practices

Number: I-17

Effective Date: 08-28-00

SUBJECT: Rehiring of Former Employees

Revision Date: 07-09-09

Former full-time or part-time employees who are rehired as full-time or part-time are eligible for full credit for previous service if the break in service was less than one year. Former temporary workers are not eligible.

The Human Resources Department will calculate a credit for former service, which will determine an adjusted hire date. The new hire date will be used to calculate Personal Leave Time and/or 401(k) corporate match, if applicable.

LOYOLA ENTERPRISES, INC.

POLICIES & PROCEDURES

CLASSIFICATION: Employment Practices

Number: I-18

SUBJECT: Employment of Relatives

Effective Date: 07-09-09

Revision Date:

Members of an employee's immediate family will be considered for employment on the basis of their qualifications. Immediate family may not be hired, however, if employment would:

1. Create a supervisor/subordinate relationship with a family member;
2. Have the potential for creating an adverse impact on work performance; or
3. Create either an actual conflict of interest or the appearance of a conflict of interest.

This policy must be considered when assigning, transferring or promoting an employee. For the purpose of this policy, immediate family includes: spouse, domestic partner, parent, child, sibling, in-law, aunt, uncle, niece, nephew, grandparent, grandchild, and members of household.

Employees who become immediate family members may continue employment as long as it does not involve any of the above. If one of the conditions outlined above should occur, attempts will be made to find a suitable position within LOYOLA to which one of the employees will transfer. The Company will make reasonable efforts to assign job duties so as to minimize problems of supervision, safety, security or morale. If accommodations of this nature are not feasible, the employees will be permitted to determine which of them will resign. If the employees cannot make a decision, the Company will decide in its sole discretion who will remain employed.

LOYOLA ENTERPRISES, INC.

POLICIES & PROCEDURES

CLASSIFICATION: Employment Practices

Number: I-19

Effective Date: 08-28-00

SUBJECT: Relocation Expenses

Revision Date: 01-01-23

Upon Executive Management approval, LOYOLA will pay for relocation costs up to a maximum of \$4,000.00. The relocation cost amount will be determined on a case-by-case basis. Specified relocation costs will be detailed in the offer letter to new employees as well as to current employees who may relocate to another location in the Company.

A one time three-day house hunting trip for the new employee and his/her spouse before their move will be allotted. The house hunting trip cost will be calculated into the specified relocation cost in the offer letter.

Mileage allowance based on actual odometer mileage, from start to destination, for one automobile, is permitted and paid at the corporate travel rate. (Refer to the Business Travel Policy for current rate).

Employees with prior entitlement to relocation reimbursement at the expense of another agency are expected to use this entitlement. For example, retired/separating armed force's personnel and some other government employees are entitled to a household move to a destination of choice within one year of retirement/separation.

Moves should be arranged so that storage of household goods will not be necessary. If unusual circumstances make storage necessary, prior approval from the President must be obtained. This cost must be detailed in the offer letter.

An Expense Reimbursement Form must be submitted within four months from date of hire in order to be reimbursed for moving expenses. LOYOLA will not pay for relocation expenses submitted after four months of employment. If an issue arises that may prevent the employee from finalizing the relocation costs by the four month deadline, he/she must inform Executive Management prior to the deadline. If the employee is unable to move within the four month timeframe, he/she may request Executive Management's approval for an extension.

Any relocation costs paid to the employee or on his/her behalf will be reimbursed to LOYOLA should employment terminate for any reason prior to one year from the date of reimbursement.

NOTE: The Company makes no commitment to absorb costs not specifically listed in the offer letter for new employees or in the transfer documentation for current employees.

Reimbursable One-Time Expenses:

- Packing of household goods (household furnishings and appliances, personal clothing and accessories, patio furniture, home workshop tools, lawnmowers, trimmers, and garden tools) from old residence.
- Delivery and unpacking of household goods to new residence.
- In-transit insurance.
- Towing of one automobile.

Specifically excluded from household shipment includes: motor vehicles (excluding one automobile), building materials, piano, heavy machinery, frozen food, animals, house plants, airplanes, perishable food, decorative stone, boats, firewood, trailers, firearms and ammunition.

Non-Reimbursable Items:

- House cleaning or maid service.
- Removal or installation of wall-to-wall carpeting, draperies, or similar items.
- Re-registration and re-licensing fees.
- Assembly or disassembly of regulation pool tables, pianos, waterbeds, children's play houses, swing sets, portable pools, or items of similar nature.

LOYOLA ENTERPRISES, INC.

POLICIES & PROCEDURES

CLASSIFICATION: Employment Practices

Number: I-20

SUBJECT: Termination of Employment

Effective Date: 06-17-98

Revision Date: 07-09-09

Employment at LOYOLA is based upon continuing mutual consent. Either the employee or employer may terminate employment with or without cause at any time for any reason. It is important for the employee's record that the termination be brought about properly to enable the Human Resources Department to process the necessary paperwork and inform employees of the disposition of their benefits, personal leave time, retirement, and other related matters.

I. VOLUNTARY TERMINATION

When an employee decides to leave for any reason, the immediate supervisor and the Human Resources Department would like the opportunity to discuss the resignation before final action is taken. LOYOLA often finds another alternative during this conversation. If, however, after full consideration the employee decides to leave, it is requested that the employee provide the Company with a written two weeks advance notice period. The employee's supervisor may request for the employee to leave prior to the end of the employee's two weeks notice. An employee who resigns with the requested notice may be favorably considered for re-employment.

In order for a termination to be considered voluntary, the employee must have provided a two (2) week termination notice.

Termination Date

An employee's termination date is the last day worked. The last day of work is the authorized final day for pay. Employees do not accrue benefits after their termination date.

Personal leave time may not be substituted for all or part of the notice period unless the supervisor has received advance notification and has approved the substitution. A Company endorsed holiday can not be designated as the final day of employment.

Final Pay Check

When employment is voluntarily terminated, the employee will be paid for all personal leave time (accrual rounded to nearest hour) up through the date of termination, provided the employee has completed the initial employment period of ninety (90) days. Eligible employees will receive their accrued personal leave time in their final pay check.

If there are unpaid obligations to the Company, the final pay check will reflect the appropriate deductions. Unpaid obligations include unreturned Company property. If an employee does not return Company property, the Company will assess and determine a fair market value cost which will be deducted from the final pay check.

Human Resources Notification

When a supervisor receives a resignation notice from an employee, the supervisor must immediately forward the notification to the Human Resources Department. The resignation notice will be put in the employee's personnel file. The employee will be contacted to participate in an exit interview with the Human Resources Manager. The employee will be advised of his/her benefits status during the exit interview.

II. INVOLUNTARY TERMINATION

Any employee whose conduct, actions, or performance violates or conflicts with LOYOLA'S policies may be terminated immediately and without warning upon the President or Executive Vice President's approval. The supervisor, higher level manager in the line of supervision, or the Human Resources Manager will notify the employee in private of the policy-based reason for the termination.

When an employee is involuntarily terminated, he/she will not be paid for personal leave time on the books. If there are unpaid obligations to the Company, the final pay check will reflect the appropriate deductions. Unpaid obligations include unreturned Company property. If an employee does not return Company property, the Company will assess and determine a fair market value cost which will be deducted from the final pay check.

The President will make any adverse action decisions concerning Company officers.

III. EXAMPLES OF SITUATIONS WHICH WARRANT IMMEDIATE TERMINATION

Examples of situations which warrant immediate termination are listed below. The list is intended to be representative of the types of activities that may result in termination. It is not exhaustive and is not intended to be comprehensive and does not change the employment-at-will relationship between the employee and the Company.

LOYOLA reserves the right to take appropriate disciplinary action, including termination, where, in the judgement of the Company, the employee has engaged in unacceptable conduct or unsatisfactory work performance which is contrary to the best interests of the Company and/or its clients. The list of examples does not restrict LOYOLA'S rights to establish or change personnel and operational policies, or the Company's right to take disciplinary action which it deems appropriate under the circumstances.

The following are some examples of grounds for immediate termination of an employee:

- Violation of the Equal Employment Opportunity and/or Anti-Harassment policies
- Violation of the Proprietary Rights and Confidentiality Agreement
- Violation of the Alcohol and Drug policy
- Unprofessional conduct
- Breach of trust or dishonesty
- Falsification of company records
- Willful violation of an established policy or rule
- Gross negligence
- Insubordination or intentional failure to carry out an instruction of a supervisor or manager
- Falsification of timesheets
- Undue and unauthorized absence from duty during regularly schedule work hours

- Deliberate non-performance of work
- Larceny or unauthorized possession of, or the use of, property belonging to any coworker, visitor, or customer of LOYOLA
- Possession of dangerous weapons on the premises
- Unauthorized possession, use or copying of any records that are the property of LOYOLA
- Excessive absenteeism or lateness
- Marring, defacing, or other willful destruction of any supplies, equipment, or property of LOYOLA
- Failure to call or directly contact your supervisor when you will be late or absent from work
- Fighting or serious breach of acceptable behavior
- Refusing an overtime assignment without good reason
- Leaving the work premises without authorization during work hours
- Gambling, conducting games of chance or possession of such devices on the premises during work hours
- Sleeping on duty

All disciplinary action will be undertaken by the Company in a fair and nondiscriminatory fashion and in accordance with the Company's Equal Employment Opportunity policy. Any questions about this policy should be addressed to the Human Resources Manager.

LOYOLA ENTERPRISES, INC.

POLICIES & PROCEDURES

CLASSIFICATION: Employment Practices

Number: I-21

SUBJECT: Exit Interview

Effective Date: 06-17-98

Revision Date: 07-09-09

In an effort to continuously monitor the quality of our services, identify areas of employee concern, and obtain useful suggestions for improvement, employees who voluntarily resign are asked to participate in an exit interview with the Human Resources Manager.

During the exit interview, the Human Resources Manager will inform the employee of the disposition of his/her benefits, personal leave time, retirement, and other related matters.

LOYOLA ENTERPRISES, INC.

POLICIES & PROCEDURES

CLASSIFICATION: Employment Practices

Number: I-22

SUBJECT: Hiring of Interns

Effective Date: 08-28-00

Revision Date: 07-09-09

LOYOLA will employ intern students for specific periods when they are not in school or have been approved by their school for a co-operative education absence.

The coordination of the recruitment and employment process for interns is the immediate responsibility of the Human Resources Department. Applications for internships are to be submitted to the Human Resources Department.

An intern is classified as a "temporary" employee. Temporary employees are not eligible for Company benefits.

The salary for interns is determined by executive management.

Selection Process

The Human Resources Department along with the hiring authority will review resumes and pre-screen potential interns. When all selected applicants have been interviewed and the hiring authority has determined the best qualified candidate, the interview process will end and an internship job offer can be extended. Offers of internships will be made by the Human Resources Manager or executive management. Upon acceptance of an internship, the Human Resources Department will immediately notify the hiring authority and prepare for the hiring process.

Orientation

An intern will be provided an abbreviated orientation program which will highlight all aspects of the position they will be engaged in as well as company policies with which they will be expected to conform to during their specific term of employment. The orientation will exclude fringe benefits which do not apply to interns.

Progress Report

The immediate supervisor of the intern will be responsible for providing a Progress Report(s) of the intern's work assignments and progress. The Progress Report must comply with the school/university's reporting requirements. The supervisor must forward the Progress Report to the Human Resources Department. The Human Resources Department will send a copy to the school/university and place the original in the personnel file.

Out-processing

On the day the intern's work assignment comes to a close, the immediate supervisor must complete an Out-processing Clearance Checklist Form and provide a Final Progress Report (the report must comply with the school/university's reporting requirements) and will forward it to the Human Resources Department. The Human Resources Department will send a copy of the progress report to the college/university and place the original in the personnel file.

The Human Resources Department will schedule an exit interview with the intern prior to his/her last day of employment.