



CIRCULARIX

EMPLOYEE HANDBOOK FOR THE CIRCULARIX COMPANIES

I. INTRODUCTION

A. WELCOME STATEMENT

We would like to tell you a few things about Circularix, LLC (“Company”, “Circularix” or “CX Entity”). The Company believes that each Employee contributes directly to its growth and success and hopes that all Employees will take pride in being a member of the team.

Circularix is comprised of people who strive for excellence. Everyone believes we make a difference in the quality of service we provide that ensures the success of the Company. We have hired you because we believe you have the skills and the potential to help the Company succeed. We hope that your experience with Circularix will continue to be challenging, enjoyable, and rewarding.

B. DESCRIPTION OF HANDBOOK

This Employee Handbook and any state specific addendum provided to you and related to your location of employment (collectively, the “Employee Handbook”) contains information about the employment policies, procedures, and practices of the Company. We expect each Employee to read this Employee Handbook carefully as it is a valuable reference for understanding your job and the Company. This Employee Handbook supersedes all previously issued Employee Handbooks and inconsistent verbal or written policy statements. Except for the policy of at-will employment, which can only be changed by Circularix, LLC’s Chief Executive Officer (CEO) or President in writing, the Company reserves the right to revise, delete and add to the provisions or policies described in this Employee Handbook. All such revisions, deletions, or additions must be in writing and must be signed by Circularix LLC’s CEO or President. No oral statements or representations can change the provisions of this Employee Handbook.

Nothing contained in this Employee Handbook shall be construed as constituting a contract or as creating any contractual obligations on the part of the Company or any Employee. None of the Company’s personnel documents and benefit plans, including this Employee Handbook, constitutes or is intended to constitute, an express or implied contract guaranteeing continued employment for any Employee. No Employee has any authority to enter a contract of employment--express or implied--that changes or alters the at-will employment relationship. Only Circularix LLC’s CEO or President has the authority to enter into an employment agreement that alters the at-will employment relationship, and any such agreement must be in writing. This Employee Handbook is the property of Circularix. All rights are reserved.

Not all company policies and procedures are set forth in this Employee Handbook. We have summarized only some of the more important ones. If you have any questions or concerns about this Employee Handbook or any other policy or procedure, please ask Human Resources.

II. EMPLOYMENT RELATIONSHIP

A. EMPLOYMENT-AT-WILL

The hope is that employment with Circularix will bring personal satisfaction and professional rewards to all Employees. Although the Company anticipates that Employees will find their employment with Circularix to be satisfactory and that the Company will be pleased with the performance of Employees, there are instances in which either the Company or an Employee wishes to terminate the employment relationship. All Employees are “at-will” Employees of the Company, meaning that each Employee is free to terminate his or her employment with the Company at any time, with or without cause, with or without notice, and that Circularix may also terminate the employment of any Employee at any time, with or without cause, with or without notice.

No Employee of the Company – other than the Circularix CEO or President -- shall have any authority to enter an employment agreement--express or implied--with any Employee providing for employment other than at-will. This policy of at-will employment is the sole and entire agreement between you and the Company as to the duration of employment and the circumstances under which employment may be terminated.

Except for employment-at-will, terms, and conditions of employment with the Company may be modified at the sole discretion of the Company, with or without cause or notice, at any time. No implied contract concerning any employment-related decision or term or condition of employment can be established by any other statement, conduct, policy, or practice. Examples of the types of terms and conditions of employment that are within the sole discretion of the Company include, but are not limited to, the following: promotion; demotion; transfers; hiring decisions; compensation; benefits; qualifications; discipline; layoff or recall; rules; hours and schedules; work assignments; job duties and responsibilities; reduction, cessation, or expansion of operations; sale, relocation, merger or consolidation of operations; determinations concerning the use of equipment, methods or facilities; or any other terms and conditions that the Company may determine to be necessary for the safe, efficient and economic operation of its business.

Nothing in the Circularix employment-at-will policy is intended to interfere with Employee rights under the National Labor Relations Act and/or other applicable laws.

B. EQUAL EMPLOYMENT OPPORTUNITY EMPLOYER

Circularix is an equal employment opportunity employer and strives to comply with all applicable laws prohibiting discrimination based on race, color, creed, sex, gender identity/expression, gender transition, sexual orientation, pregnancy, religion, age, ancestry, national origin, ethnicity, alienage, military or veteran status, marital or domestic partner status, civil union status, physical or mental disability, medical condition, genetic characteristics, the use of a guide or support animal because of blindness, deafness, or physical handicap as well as any other category protected by

federal, state, or local laws. All such discrimination is unlawful, and all persons involved in the operations of the Company are prohibited from engaging in this type of conduct.

You should report every instance of unlawful discrimination or harassment to your manager, GM, or (Human Resources), regardless of whether you or someone else is the subject of the discrimination. Detailed reports--including names, descriptions, and actual events or statements made--will greatly enhance the Company's ability to investigate. Any documents supporting the allegations should also be submitted. Based on your report, the Company will investigate. The Company prohibits all retaliation for submitting a report of unlawful discrimination and for cooperating in any investigation. Any Employee who retaliates against the accuser or those involved in the investigation will be disciplined, up to and including discharge and (termination of) employment.

If the investigation determines that prohibited discrimination or other conduct which violates Company policy has occurred, the Company will take disciplinary action, up to and including termination of employment, against those who engaged in the misconduct. The Company will also evaluate whether other employment practices should be added or modified in order to deter and prevent that conduct in the future. If you make a complaint, you will be informed of the outcome of the Company's investigation as the Company deems appropriate.

C. REASONABLE ACCOMMODATION

Disability Accommodation: The Company will provide reasonable accommodations for the known physical or mental disabilities of an otherwise qualified applicant for employment or employee unless undue hardship would result. Any applicant or employee who requires reasonable accommodation to perform the essential functions of a job should contact Management. The applicant or Employee should advise the Company what accommodations they believe are needed to perform the job. Together with the Applicant or Employee, the Company will engage in an interactive process to determine effective, reasonable accommodations, if any. If such an accommodation is possible and will not impose an undue hardship upon the Company, the Company will make the accommodation.

The Company also reserves its right to require an Employee to undergo a fitness (physical) for duty medical examination, at the Company's expense, if the Company believes or suspects that the Employee may not be able to perform the essential duties of the job without risk of harm to him or herself or others. In such an instance, the Company will advise the Employee, in writing, of the need for the examination. Depending on the situation, the Company reserves the right to suspend employment pending the results of the examination.

Pregnancy Accommodation: A pregnant Employee may request reasonable accommodation of her condition upon presentation of a doctor's written certification attesting that the accommodation request is upon the doctor's advice. Such accommodation may include, but is not limited to, a transfer to a less strenuous or

hazardous position. If such a transfer can be reasonably accommodated, a pregnant Employee will be transferred for the duration of her pregnancy. However, the Company will not undertake to create additional employment that the Company would not otherwise have created to meet its own business needs. The Company will not be required to discharge any Employee, transfer any Employee with more seniority than the pregnant Employee, or promote any Employee who is not qualified to perform the job. Upon transfer, an Employee will receive the salary and benefits, which are regularly provided to Employees in the position to which the Employee has transferred.

Lactation Accommodation: Employees who wish to express breast milk at work may request reasonable accommodation to do so, which may include increased break time and privacy.

III. COMMENCING EMPLOYMENT

A. BACKGROUND CHECKS

The Company recognizes the importance of maintaining a safe workplace with Employees who are honest, trustworthy, qualified, reliable, and nonviolent, and who do not present a risk of serious harm to their coworkers or others. For purposes of furthering these concerns and interests, the Company reserves the right to investigate an individual's prior employment history, personal references, and educational background, as well as other relevant information that is reasonably available to the Company.

The Company may review and investigate an applicant's or an existing Employee's credit report and criminal background if any. If a background check is conducted, the Company will comply with the federal Fair Credit Reporting Act and applicable state laws, including providing the job applicant or existing Employee with any required notices and forms. Consistent with these practices, job applicants or existing Employees may be asked to sign certain authorization and release forms. Consistent with legal requirements, the Company reserves the right to request job applicants or existing Employees to sign the forms as requested as a condition of employment.

Employees may be required to take a pre-employment physical examination after receiving an offer of employment and before beginning work. This examination is provided by Circularix at its sole expense. Consequently, there is no cost to the Employee. The Employee's offer of employment is contingent upon the Employee's successful completion of the physical examination. If a pre-employment medical examination is conducted, the Company will comply with the applicable federal, state, and/or local laws.

B. IMMIGRATION COMPLIANCE

The Company will comply with applicable immigration law. As a condition of employment, every individual must provide satisfactory evidence of his or her identity and legal authority to work in the United States and complete the U.S. Citizenship and Immigration Services Employment Eligibility Verification (I-9) Form. If you have any

questions or need more information on immigration law issues, please contact Human Resources.

C. EMPLOYMENT STATUS

Employees are classified as full-time non-exempt, part-time non-exempt, or exempt.

1. Full-Time Employees

Full-time Employees are those Employees who are regularly scheduled to work and do work 30 or more per week. Full-time Employees are eligible for all the benefits described in this Employee Handbook.

2. Part-Time Employees

Part-time Employees are those Employees who are scheduled to work 29 hours or less per week. Part-time Employees are not eligible for Employee benefits except where mandated by applicable law.

3. Temporary Employees

Temporary Employees are those Employees who are holding jobs of limited duration arising out of special projects, irregular workloads or other circumstances, on a short-term basis (typically less than 3 months). Temporary Employees will not automatically change from temporary to another status merely by working in excess of the period originally expected. Temporary Employees are not eligible for Employee benefits, except where mandated by applicable law.

4. Exempt Employees

Exempt Employees are those Employees whose job assignments meet the federal and state requirements for overtime exemption. Exempt Employees are compensated on a salary basis and are not eligible for overtime pay. Generally, executive, administrative, professional, and certain outside sales Employees are overtime exempt. You will be informed by Management if your status is exempt.

5. Non-Exempt Employees

Non-exempt Employees are those Employees whose job assignments meet the federal or applicable state law requirements for overtime pay. Non-exempt Employees are those Employees covered by the minimum wage and overtime pay requirements of the Fair Labor Standards Act of 1938.

D. INTRODUCTORY PERIOD

The first three (3) months of continuous employment at the Company will no doubt be a learning experience. You will learn your job duties, and responsibilities, and you will get acquainted with your fellow Employees, and familiarize yourself with the Company in general. We refer to this initial period of employment as your Introductory Period.

While we understand that you will be learning a lot about your new job, you are still expected to perform satisfactorily, and your performance will be reviewed closely. Also, please understand that completion of the Introductory Period does not guarantee continued employment and does not change the at-will nature of the employment relationship.

E. JOB DUTIES

As part of your initial orientation, you will learn the various duties and responsibilities of your job. The Company maintains certain expectations and standards applicable to your job position. HR and Site Leadership will review these with you.

It is expected that Employees will perform additional duties and assume additional responsibilities as needed by Site Leadership for the efficient operation of the Company.

To adjust to changes in our business, it may become necessary to modify your job description, add to or remove certain duties and responsibilities, or reassign you to an alternate job position.

F. TELECOMMUTING

Telecommuting allows employees to work at home, on the road or in a satellite location for all or part of their workweek. Circularix considers telecommuting to be a viable, flexible work option when both the employee and the job are suited to such an arrangement. Telecommuting may be appropriate for some employees and jobs but not for others. Telecommuting is not an entitlement, it is not a companywide benefit, and it in no way changes the terms and conditions of employment with Circularix.

Remote work can be informal, such as working from home for a short-term project or on the road during business travel, or a formal, set schedule of working away from the office or on an as needed basis. Either an employee or a supervisor can suggest telecommuting as a possible work arrangement. All remote work needs to be preapproved.

Eligibility

Before entering into any telecommuting agreement, the employee and manager, with the assistance of the human resource department on an as needed basis, will evaluate the suitability of such an arrangement, reviewing the following areas:

- Employee suitability. The employee and manager will assess the needs and work habits of the employee, compared to traits customarily recognized as appropriate for successful telecommuters.
- Job responsibilities. The employee and manager will discuss the job responsibilities and determine if the job is appropriate for a telecommuting arrangement.
- Tax and other legal implications. The employee must determine any tax or legal implications under IRS, state and local government laws, and/or restrictions of working out of a home-based office. Responsibility for fulfilling all obligations in this area rests solely with the employee.

General Expectations

- Remote employees are expected to be available and communicative during scheduled work hours.
- Circularix work rules and other policies continue to apply to offsite work locations.
- Unless specified in writing by a member of the Senior Management team (the CEO, CFO, VP or General Counsel), an employee is expected to work on site at least 3 days per week.
- Employees should seek a quiet and distraction-free workspace.
- Casual dress is acceptable; however please use your discretion and abide by Circularix dress code policy.
- Turning on your video during meetings is always encouraged.

Equipment

Circularix will supply the employee with appropriate office supplies as deemed necessary, similar to supplies provided for work in the office such as paper, pens, pencils, staples, clips, etc. Circularix will also reimburse the employee for business-related expenses that are pre-approved by management and are reasonably incurred in carrying out the employee's job.

The employee will establish an appropriate work environment within his or her home for work purposes. Circularix will not be responsible for costs associated with the setup of the employee's home office, such as remodeling, furniture or lighting, nor for repairs or modifications to the home office space.

Security

Consistent with the organization's expectations of information security for employees working at the office, telecommuting employees will be expected to ensure the protection of proprietary company and customer information accessible from their home office. Steps include the use of locked file cabinets and desks, regular password maintenance, and any other measures appropriate for the job and the environment.

Ad Hoc Arrangements

Temporary telecommuting arrangements may be approved for circumstances such as

inclement weather, special projects or business travel. These arrangements are approved on an as-needed basis only, with no expectation of ongoing continuance. Other informal, short-term arrangements may be made for employees on family or medical leave to the extent practical for the employee and the organization and with the consent of the employee's health care provider, if appropriate. All informal telecommuting arrangements are made on a case-by-case basis, focusing first on the business needs of the organization.

Disciplinary Action

While gentle reminders may be all that is necessary in some circumstances, egregious or continued violations for these expectations will result in disciplinary action as per the terms set forth in this handbook under the section "Progressive Discipline".

Compensation and Work Hours

Employees working remotely who are in nonexempt positions must know, understand and follow the Company's meal and rest period and overtime policies while working remotely. Nonexempt remote employees must take timely and off-duty meals and rest breaks consistent with the Company's policies as if they were working at a Circularix facility and must clock out for all unpaid meal periods.

An employee's compensation, benefits, work status and work responsibilities will not change due to remote work. The amount of time the Employee is expected to work per day or pay period will not change because of remote work. If Employees are unsure of what hours they are expected to work while working remotely, they should consult their manager.

Employees working remotely who are not exempt from overtime requirements must comply with all Circularix policies regarding overtime and must accurately and timely record all hours worked, and meal/rest periods taken. Hours worked outside of or more than those scheduled per day and per workweek (including time spent reading and/or responding to work-related emails or other communications or making or taking work-related telephone calls) require the advance approval of management.

Remote work is not a substitute for family care arrangements. Employees must determine how to provide primary care for dependents during working hours.

TO BE ELIGIBLE FOR PARTICIPATION IN THE REMOTE WORK ARRANGEMENT, EMPLOYEES MUST RECEIVE WRITTEN APPROVAL FROM HR OR A MEMBER OF SENIOR MANAGEMENT. THE COMPANY RESERVES THE RIGHT TO REVOKE ANY REMOTE WORK ARRANGEMENT AT ANY TIME, OR TO OTHERWISE MODIFY THIS POLICY OR ANY PARTICULAR EMPLOYEE'S ABILITY TO WORK REMOTELY IN THE COMPANY'S SOLE DISCRETION.

G. INTERNAL JOB TRANSFERS/LOCATION TRANSFERS

Employees may apply for a transfer opportunity provided they meet the following eligibility requirements:

- Minimum of 6 months of continuous service in the present position, or the approval of the manager.
- Minimum of one year of continuous service in the present position after the first transfer, or the approval of the manager.
- Your job performance must be at a satisfactory level and the incumbent is not to be in the middle of formal disciplinary action.
- Meet the minimum experience, skill, and education qualifications for the open position.

Employees interested in applying for an open position can contact Human Resources or the hiring manager for additional job information. If the employee so requests, Human Resources will keep their inquiries regarding a posted position confidential.

Typically, the employee's salary will not change due to a transfer, unless the position is considered a promotional transfer, in which case a promotional salary increase will be considered.

The Company may require employees to transfer to specific positions based on business needs and conditions.

In the event, an employee is transferred to another Circularix location, the employee's seniority will transfer with them.

IV. PAYROLL

A. WORKING HOURS & SCHEDULE

1. Schedule

Circularix is normally open for business 24 hours a day, seven days a week. Because of the nature of our business, your work schedule may vary depending on your job, and site management will assign your individual work schedule. All Employees are expected to be at their desk or workstation at the start of their scheduled shift, ready to perform their work.

Changes in work schedules are discouraged. However, if it is necessary to alter your schedule, notify site management who will attempt to accommodate you (if possible). Schedule changes will not be approved for mere convenience or if it results in disruption of or interference with normal operations or will result in excessive overtime.

In order to accommodate the needs of our business, it may be necessary to change individual work schedules on either a short-term or long-term basis.

2. Meal Periods

Meal periods will be scheduled according to operational requirements and in compliance with applicable law. Regular full-time non-exempt employees will receive breaks as necessary, each workday, and they will be scheduled or approved by site management. The employee must clock out for meal periods.

3. Rest Periods

Meal periods will be scheduled according to operational requirements and in compliance with applicable law. Regular full-time non-exempt employees will receive breaks as necessary, each workday.

4. Emergencies

At times, emergencies such as power failures, road closings, earthquakes, fires, or severe weather may interfere with the company's operations. In such an event, the company may order a temporary shutdown of part or all of its operations. Depending on the circumstances, time off may or may not be paid pursuant to applicable federal, state, and/or local laws.

B. TIMEKEEPING PROCEDURES

Non-exempt Employees must record their actual time worked for payroll and benefits purposes each workday by using the Company's time tracking system by recording when work begins and promptly recording time at their arrival or departure time. Non-exempt Employees are also expected to record their actual time by promptly recording their time at the beginning of each meal period (time out for meal period) and recording their time at the ending time of each meal period (time in from meal period). Non-exempt Employees must also record any departure from work for any non-work-related reason.

Altering, falsifying, tampering with time records, and/or recording time on another Employee's time record, is prohibited and subject to disciplinary action, up to and including termination of employment.

Additionally, site leadership cannot permit (a non-exempt Employee) to work "off the clock." If site leadership asks you to work "off the clock", you must immediately engage Human Resources. Non-exempt Employees are not permitted to work "off the clock" at any time. For the purposes of this policy, "off the clock" work is where an Employee works for the Company but does not accurately record his/her time in the Company's approved time record.

Non-exempt Employees are ***strictly prohibited*** from performing any work while not on duty. This means that non-exempt Employees are prohibited from performing work of any kind including taking work-related calls or checking work-related e-mails, for

example, during their vacation, while on leave, while not at work, and/or during their unscheduled shift.

On occasion, as a necessary business function, some non-exempt Employees may receive a work-related phone call and/or a text message during the Employee's non-working hours pertaining to Company business. Under such circumstances, if the Employee responds to the phone call and/or text message while not on duty, the Employee will be paid for the time spent working while responding to the phone call and/or text message. An Off-Duty Contact Log must be completed and signed by site management and turned in to Human Resources immediately when you return to work for your next scheduled shift.

Further, if a non-exempt Employee performs any work outside of his/her scheduled shift, he/she must report the time worked to site management immediately. It is your responsibility to ensure that your time record accurately reflects all time recorded. Any errors in your timecard/should be reported immediately to site management or Human Resources, who will attempt to correct legitimate errors. Failure to maintain accurate time sheets and meet the above requirements may result in disciplinary action, up to and including termination of employment.

C. WORK OUTSIDE OF NORMALLY SCHEDULED HOURS

Certain Employees may be offered the opportunity to perform physical work at a Circularix location at a time that is outside of their scheduled shift. If any Employee accepts such an offer, that Employee must arrive at work at the time scheduled by Circularix. Such an Employee will be paid for a minimum of four (4) hours of work at the Employee's base rate of pay, and will be paid for all time actually worked.

D. OVERTIME

When operating requirements or other needs cannot be met during regular working hours, you may be scheduled to work overtime. All overtime work must be authorized/approved in advance by site management. Working overtime without prior authorization may result in disciplinary action. Non-exempt Employees will be paid time and one-half compensation for all hours worked after completing forty (40) hours in one work week.

Exempt Employees are expected to work as much of each workday as is necessary to complete their job responsibilities. No overtime or additional compensation is provided to exempt Employees. For the purposes of calculating overtime for non-exempt Employees, the workday week begins Sunday and ends Saturday. Check with site management for your weekly schedule. During any startup period(s) as defined by the management team or your supervisor, schedules are subject to change.

All overtime must be approved in advance and in writing by site management. Work performed on a weekend, your regular day off, or a holiday may not automatically

entitle you to overtime pay. Only hours worked are used to calculate overtime compensation. Vacations or any leave of absence are not considered hours worked for purposes of performing overtime calculations.

E. PAYMENT OF WAGES

Employees will be paid on a bi-weekly basis on Fridays. If a Friday is a holiday, Employees will be paid on Thursday.

If there is an error in your check, please report it immediately to site management or to Human Resources. No one, other than the Employee to whom the paycheck is written out to will be allowed to pick up a paycheck unless written authorization has been given for another person to do so.

F. DIRECT DEPOSIT

Direct deposit is strongly encouraged. Employees may designate one or more bank accounts for the automatic deposit of their paychecks. For example, a set amount may be directed into your savings account, with the balance deposited into your checking account. All the required enrollment and consent forms are available from Human Resources.

G. WAGE GARNISHMENTS

The Company will deduct the administrative costs of complying with wage assignment and garnishment orders, to the amount allowed by statute.

H. SALARY ADVANCE/LOANS

Circularix does not give salary advances or loans on unearned wages to Employees.

I. EXPENSE REIMBURSEMENTS/TRAINING/SEMINARS

Circularix reimburses Employees for reasonable expenses incurred through pre-approved business expenses.

For the benefit of Circularix and/or individual Employees, it may be necessary for Employees to attend training programs, seminars, conferences, lectures, meetings, or other outside activities. Attendance at such activities may be required by Circularix or requested by individual Employees. Employees must obtain prior approval from Site GM or Corporate Level Leadership, to attend outside activities and must submit a written request detailing all relevant information including date, hours, location, cost, expenses, nature, purpose, and justification for attendance. In some cases, the individual may be required to provide a detailed trip report as defined by Site Leadership. Customary and reasonable expenses will be reimbursed upon submission of proper receipts. Customary

and reasonable expenses generally include registration fees, materials, meals, transportation, and parking.

Non-exempt Employees will be compensated in accordance with normal payroll practices for attendance outside activities required by Circularix. This policy does not apply to an Employee's voluntary attendance outside of normal working hours in formal or informal educational instruction or instruction which generally leads to improved job performance. While Circularix generally encourages all Employees to improve their job skills and promotional qualifications, such activities will not be subject to this policy regarding reimbursement or compensation unless Circularix requires participation or attendance

V. PERSONNEL

A. OPEN-DOOR POLICY

The Company recognizes that Employees will have suggestions for improving the workplace, and/or complaints about the workplace. The most satisfactory solution to a job-related problem or concern is usually reached through a prompt discussion with Management. Please feel free to contact site management or Human Resources with any suggestions and/or complaints.

While the Company provides you with this opportunity to communicate your views, please understand that not every complaint can be resolved to your satisfaction. Even so, the Company believes that open communication is essential to a successful work environment and all Employees should feel free to raise issues of concern without fear of retaliation.

B. UNLAWFUL HARASSMENT

In accordance with applicable law, the Company prohibits sexual harassment and unlawful harassment because of race, color, creed, sex, gender identity/expression, sexual orientation, religion, age, ancestry, national origin, ethnicity, alienage, military or veteran status, marital or domestic partner status or civil union status, physical or mental disability, medical condition, genetic characteristics, the use of a guide or support animal because of blindness, deafness, or physical handicap as well as any other category protected by federal, state or local laws. All such harassment is unlawful and will not be tolerated.

1. Sexual Harassment Defined

Applicable state and federal law define sexual harassment as unwanted sexual advances, requests for sexual favors, or visual, verbal, or physical conduct of a sexual nature, when: (1) submission to the conduct is made a term or condition of employment; or (2) submission to or rejection of the conduct is used as a basis for employment decisions affecting the individual; or (3) the conduct has the purpose or effect of

unreasonably interfering with the Employee's work performance or creating an intimidating, hostile or offensive working environment. This policy prohibits sexual harassment and other forms of offensive behavior. The following is a partial list:

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

It is unlawful for males to sexually harass females or other males, and for females to sexually harass males or other females. Sexual harassment on the job is unlawful whether it involves coworker harassment or harassment by non-employees or others doing business with or for the Company.

2. Other Types of Harassment

Prohibited harassment on the basis of race, color, creed, sex, gender identity/expression, sexual orientation, religion, age, ancestry, national origin, veteran status, marital or registered domestic partner status, physical or mental disability, medical condition, genetic characteristics as well as any other category protected by federal, state or local laws, includes behavior similar to sexual harassment, such as:

- a. Verbal and/or abusive conduct such as threats, epithets, derogatory comments or slurs.

- b. Visual conduct such as derogatory posters, photographs, cartoons, drawings or gestures.
- c. Physical conduct such as assault, unwanted touching or blocking normal movement; and
- d. Retaliation for reporting harassment or threatening to report harassment.

3. The Company's Complaint Procedure

The Company's complaint procedure provides for an immediate, thorough and objective investigation of any claim of unlawful or prohibited harassment, appropriate disciplinary action against one found to have engaged in prohibited harassment, and appropriate remedies for any victim of harassment. A claim of harassment may exist even if the Employee has not lost a job or some economic benefit.

The Company wants you to use these procedures so you can (a) help us put a stop to unlawful harassment and (b) avoid any further harm you may have suffered.

If you believe you have been harassed on the job, or if you are aware of the harassment of others, you should provide a written or verbal complaint to Human Resources as soon as possible. Your complaint should be reported immediately, as detailed as possible, preferably in writing, including the names of individuals involved, the names of any witnesses, direct quotations when language is relevant and any documentary evidence (notes, pictures, cartoons, etc.). **Supervisors and Managers must immediately refer all harassment complaints to the Human Resources and/or Circularix CEO or General Counsel.**

Applicable law also prohibits retaliation against any Employee by another Employee or by the Company for using this complaint procedure or for filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by a governmental enforcement agency. Additionally, the Company will not knowingly permit any retaliation against any Employee who complains of prohibited harassment or who participates in an investigation.

All incidents of prohibited harassment that are reported will be investigated. The Company will immediately undertake or direct an effective, thorough and objective investigation of the harassment allegations. The investigation will be completed and a determination regarding the reported harassment will be made and communicated to the Employee who complained and to the accused.

If the Company determines that prohibited harassment has occurred, the Company will take effective corrective action corresponding with the circumstances. Appropriate action will also be taken to discourage any future harassment. If a complaint of prohibited harassment is substantiated, appropriate disciplinary action, up to and

including termination of employment, will be taken. If a substantiated complaint involves non-Employees or others doing business with or for the Company, we will take appropriate action to stop any unlawful harassment in the future. Whatever action is taken against the accused will be communicated to the Employee who complained.

Employee confidentiality will be protected to the extent practical for the Company to investigate and take appropriate disciplinary action.

4. Liability for Harassment

Any Employee of Circularix who is found to have engaged in prohibited harassment is subject to disciplinary action, up to and including discharge from employment. Any Employee who engages in prohibited harassment, including Management personnel who knew about the harassment but took no action to stop it, may be held personally liable for monetary damages. Any Management personnel who knew about the harassment and took no action to stop it or failed to report the harassment to Management may also be subject to discipline, up to and including discharge. The Company does not consider conduct in violation of this policy to be within the course and scope of employment or the direct consequence of the discharge of one's duties. Accordingly, to the extent permitted by law, the Company reserves the right not to provide a defense or pay damages assessed against Employees for conduct in violation of this policy.

5. Additional Enforcement Information

In addition to the Company's internal complaint procedure, Employees should also be aware that the federal Equal Employment Opportunity Commission (EEOC) and applicable state agencies investigate and pursue complaints of unlawful harassment and discrimination in employment. Employees who believe that they have been unlawfully harassed may file a complaint with either of these agencies. The PHRC regional office is at 333 Market St., 8th Floor Harrisburg, PA 17101. The local PHRC office is at 110 North 8th Street, Suite 501 Philadelphia, PA 19017.

For more information, contact Management. You may also contact the nearest office of the EEOC or the PHRC, as listed in the telephone directory.

C. WHISTLEBLOWER PROTECTION AND NON-RETALIATION POLICY

The Company will not adopt or enforce any rule, regulation, or policy preventing an Employee from disclosing information to the Company or to a governmental or law enforcement agency if the Employee believes the information discloses a violation of state or federal statute or Company policy, or a violation of or non-compliance with a state or federal rule or regulation.

If any Employee wishes to make a report regarding suspected unlawful activity, he or she should report the activity immediately to Human Resources who will initiate a

timely, thorough, and objective investigation. Reports should be in writing with as much detail as possible.

The Company will not:

- Retaliate against an Employee for disclosing information about the suspected unlawful activity as defined above to a governmental or law enforcement agency or violation of a Company rule.
- Retaliate against an Employee for refusing to participate in an activity that would result in a violation of state or federal statute, or a violation of or noncompliance with a state or federal rule or regulation or a Company rule.
- Retaliate against an Employee for having exercised his or her rights in his or her present or former employment.

D. PROHIBITED CONDUCT

To assure orderly operations and provide the best possible work environment, Circularix expects Employees to follow rules of conduct that will protect the interests and safety of personnel. It is not possible to list all the forms of behavior that are considered unacceptable in the workplace, but the following are examples of infractions of rules of conduct that may result in disciplinary action, including suspension, demotion, or termination of employment.

1. Falsification of employment records, employment information, or other records.
2. Recording the work time of another Employee, allowing any other Employee to record your work time, or allowing falsification of any timecard, whether your own or another Employee's.
3. Theft or the deliberate damage of any Company property or the property of any Employee.
4. Removing or borrowing the Company property without prior authorization.
5. Unauthorized use of the Company equipment, time, materials, or facilities.
6. Working under the influence of alcohol or drugs or your body/breath smelling like alcohol or drugs on Company premises and/or on Company time.
7. Possessing, distributing, selling, transferring, or using--or being under the influence of--alcohol or illegal drugs in the workplace.
8. Provoking a fight or fighting during working hours or on premises owned or occupied by the Company.

9. Participating in horseplay or practical jokes on the Company's time or on premises owned or occupied by the Company.
10. Personal cell phones will not be allowed inside manufacturing unless authorized by management.
11. Possession of firearms or any other dangerous weapons, at any time, on premises owned or occupied by the Company (to the maximum extent permitted by state law).
12. Engaging in illegal conduct that is harmful to the reputation of the Company whether related to job performance.
13. Causing, creating, or participating in a disruption of any kind during working hours or on premises owned or occupied by the Company.
14. Unwelcome, negative comments, gossip, and/or rumors involving/criticizing another employee, management, or Company will not be tolerated.
15. Insubordination, including, but not limited to, failure or refusal to obey the orders or instructions of management or any member of Management, the use of abusive or threatening language toward employees or a member of Management, or refusal to fully disclose information during the Company's investigations.
16. Using profane, abusive language or engaging in abusive conduct at any time during working hours or while on premises owned or occupied by the Company.
17. Failing to notify your managers when unable to report to work.
18. Unreported absence of three (3) consecutive scheduled workdays.
19. Failing to observe working schedules, including rest and lunch periods.
20. Failing to obtain permission to leave work for any reason during normal working hours.
21. Failing to provide a physician's certificate when requested or required to do so.
22. Working overtime without authorization or refusing to work assigned overtime.
23. Failing to adhere to the Company's dress code policy while working.
24. Violating any safety, health, or security policy, rule, or procedure of the Company.
25. Committing a fraudulent act, dishonest act, breach of trust, or violating the duty of loyalty to the Company in any circumstances.

26. Failing to maintain confidential or proprietary information or Company trade secrets or engaging in direct competition with the Company.

While the Company has a formal progressive discipline policy (see below), any misconduct or violation of the Company's policies may result in discipline, up to and including immediate termination. This statement of prohibited conduct does not alter or limit the Company's policy of employment-at-will. Either you or the Company may terminate the employment relationship at any time for any reason, with or without cause or without notice.

E. POLICIES AGAINST WORKPLACE VIOLENCE

1. Statement of Policy

Circularix recognizes that violence in the workplace is a growing nationwide problem necessitating a firm, considered response by employers. The costs of workplace violence are great, both in human and financial terms. We believe that the safety and security of the Company Employees are paramount. Therefore, the Company has adopted a zero-tolerance policy regarding workplace violence.

Acts or threats of physical violence, including intimidation, harassment, and/or coercion, that involve or affect the Company or that occur on Company property or in the conduct of Company business off the Company property, will not be tolerated. This prohibition against threats and acts of violence applies to all persons involved in the Company operations, including, but not limited to, the Company, personnel, and anyone else on the Company property or conducting Company business off Company property. Violations of this policy, by any individual, will lead to disciplinary and/or legal action as appropriate.

This policy is intended to bring the Company into compliance with existing legal provisions requiring employers to provide a safe workplace; it is not intended to create any obligations beyond or replace those required by existing law.

2. Definitions

Workplace violence is any intentional conduct that is sufficiently severe, offensive, or intimidating to cause an individual to reasonably fear for his or her personal safety or the safety of his or her family, friends, and/or property such that employment conditions are altered or a hostile, abusive or intimidating work environment is created for one or several the Company Employees. Workplace violence may involve any threats or acts of violence occurring on Company premises, regardless of the relationship between the Company and the parties involved in the incident. It also includes threats or acts of violence that affect the business interests of the Company or that may lead to an incident of violence on Company premises. Threats or acts of violence occurring off Company premises that involve Employees, agents, or individuals acting as a representative of the Company, whether as victims of or active participants in the conduct, may also constitute

workplace violence. Specific examples of conduct that may constitute threats or acts of violence under this policy include, but are not limited to, the following:

- a. Threats or acts of physical or aggressive contact directed toward another individual.
- b. Threats or acts of physical harm directed toward an individual or his/her family, friends, associates, or property.
- c. The intentional destruction or threat of destruction of Company property or another Employee's property.
- d. Harassing or threatening phone calls or text messages.
- e. Surveillance.
- f. Stalking.
- g. Indirect threats of physical harm or similar intimidation; and
- h. Any conduct resulting in the conviction under any criminal code provision relating to violence or threats of violence that adversely affects the Company's legitimate business interests. Workplace violence does not refer to occasional comments of a socially acceptable nature. These comments may include references to legitimate sporting activities, popular entertainment, or current events. Rather, it refers to behavior that is personally offensive, threatening, or intimidating.

3. Enforcement

Any person who engages in a threat or violent action on Company property may be removed from the premises as quickly as safety permits and may be required, at the Company's discretion, to remain off Company premises pending the outcome of an investigation of the incident.

When threats are made or acts of violence are committed by Employee(s), a judgment will be made by the Company as to what actions are appropriate, including possible medical evaluation and/or possible disciplinary action.

Once a threat has been substantiated, it is the Company's policy to put the threat maker on notice that he/she will be held accountable for his/her actions and then implement a decisive and appropriate response.

Under this policy, decisions may be needed to prevent a threat from being carried out, a violent act from occurring or a life-threatening situation from developing. No existing policy or procedure of the Company should be interpreted in a manner that prevents the making of these necessary decisions.

In keeping with this policy, please report any current or outstanding restraining orders to Human Resources along with a copy of the petition and declarations used to apply for the order. Such information will be kept confidential to the extent possible without compromising the safety and security of Employees.

Important Note: The Company will make the sole determination of whether, and to what extent, threats or acts of violence will be acted upon by the Company. In making this determination, the Company may undertake a case-by-case analysis in order to ascertain whether there is a reasonable basis to believe that workplace violence has occurred. No provision of this policy shall alter the at-will nature of employment at the Company.

F. PROGRESSIVE DISCIPLINE

The following describes the types of discipline which may be imposed for violations of Circularix rules. Circularix may issue any type of discipline at its sole discretion. The Company is not required to provide a warning prior to suspending or terminating an Employee. The following are the types of discipline that may be issued in any order, at the Company's sole discretion. Nothing in this policy in any way changes and/or modifies the Employee's at-will status.

1. Verbal Warning

In some situations, site leadership may find it appropriate to discuss a problem with an Employee. The verbal warning will be documented and placed in the Employee's personnel file.

2. Written Warning

A written warning describes what the problem is, what steps must be taken to correct the problem, a deadline for improvement, and the consequences of failure to improve (such as further discipline or termination). The written warning shall be included in the Employee's personnel file in Human Resources.

3. Final Written Warning

A Final Written Warning informs the Employee that if a problem is not corrected, the Employee may be discharged.

4. Suspension

A suspension constitutes time off with or without pay. Employees may be reinstated to full duty after suspension or may be discharged immediately depending on the outcome of an investigation. If the performance or other problem continues after an employee returns to work, the Employee may be discharged.

5. Termination

A termination is when the employee has failed to correct their unsatisfactory performance.

G. CONDUCT & EMPLOYMENT OUTSIDE WORK

In general, Circularix does not seek to interfere with the Employees' off-duty activities. However, the Company cannot tolerate off-duty conduct that impacts negatively on the Company, either in terms of an Employee's individual work performance or the business interests of the Company, including its reputation. For example, the Company prohibits any illegal conduct by an off-duty Employee that affects or has the potential to affect the Company. Also, the Company prohibits outside employment (including self-employment) that conflicts with employment at the Company, impacts the Employee's work performance or schedule and/or affects the business interests of the Company. Employees must contact Management prior to engaging in any outside employment which may interfere with the business of the Company.

H. CONFLICTS OF INTEREST

The Company expects its Employees to devote their full work time, energies, abilities, and attention to its business. Employees are expected to avoid situations that create an actual or potential conflict between the Employee's personal interests and the interests of the Company. A conflict of interest exists when an employee's loyalties or actions are divided between the Company and a competitor, supplier, and all other organizations or individuals doing or seeking to do business with the Company. Employees who are unsure whether a certain transaction, activity, or relationship constitutes a conflict of interest should discuss it with Management for clarification. Management must approve any exceptions to this guideline in writing.

It is our policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. In most cases, Employees receiving a gift from a vendor or customer should be shared with as many Circularix Employees as possible. An example is a holiday gift basket can be placed in the Employee lunchroom for all to enjoy or a gift card can be raffled off to Employees in a specific department or companywide. Please discuss options for gift receipts with Human Resources.

In the case of expenses paid by such persons for business meals or trips, please discuss this with Human Resources and the Circularix CEO, CFO or General Counsel. In no event may a gift, gratuity, or expense payment influence a business decision, transaction, or service.

Employees may give and/or receive business gifts to/from customers and suppliers under the following circumstances:

- Gifts of nominal value (\$50.00 or less)
- Reciprocal meal or entertainment exchanges that serve legitimate business interests or are infrequent, normal, and expected social courtesies
- Inexpensive items such as logo pens, cups, or other similar advertising novelties of the same nominal aggregate value

In addition, Employees may not divert for personal gain any business opportunity from which Circularix may profit unless Circularix validly decides to forego the opportunity. The policy is violated if the Employee personally profits from a business opportunity that rightfully belongs to Circularix. A problem arises when an Employee has an interest in an entity that offers a product or a service that could be offered by Circularix or when an Employee directly offers such a product or service.

Failure to adhere to this guideline, including failure to disclose any conflict or seek an exception, may result in disciplinary action, up to and including termination of employment.

Any questions regarding the conflict-of-interest policy should be directed to Human Resources or the General Counsel.

I. ROMANTIC RELATIONSHIPS AND EMPLOYMENT OF RELATIVES

Circularix recognizes that Employees may develop personal relationships during their employment. However, to prevent favoritism, morale problems, disputes or misunderstandings, and potentially sexual harassment claims, Circularix discourages leadership from dating and/or engaging in sexual relationships with subordinate Employees. Furthermore, Circularix discourages coworkers from dating or pursuing romantic or sexual relationships with each other.

An Employee involved in any of the types of relationships or situations described in this policy should immediately and fully disclose the relevant circumstances to Human Resources. You may be asked to sign an Acknowledgement of Relationship and Agreement with the Company.

In addition, Circularix hires and promotes based on the best qualifications and merit for every job opening. The Company does not have a general prohibition against hiring relatives. However, a few restrictions have been established to help prevent problems of harassment, safety, security, supervision, and morale.

Close family members generally may not be hired or transferred into positions where they have access to sensitive information regarding a close family member, or if there is an actual or apparent conflict of interest (including but not limited to establishing an immediate supervisor/employee relationship).

These restrictions apply to the following degrees of relationship, whether established by blood, marriage, or other legal action: spouse, a domestic partner (including parties to a civil union), child, stepchild, parent, stepparent, sibling, grandparent, grandchild, parent-in-law, son-in-law, daughter-in-law, sister-in-law, brother-in-law, aunt, uncle, nephew, niece cousin, or relations of the same degree of a domestic partner. This policy also applies to romantic relationships.

If marriage or other action creates these kinds of relationships, one of the employees affected must give up that position by the end of the fiscal year or within six months from the date the relationship was established (whichever is the greater period). The employees will be permitted to determine which of them will resign. If employees cannot decide, the Company will decide who will remain in the position. At the sole discretion of the Company, either or both employees may be allowed to transfer to other positions within the company.

Circularix expects its Employees to act as professionals and remember their individual commitment to Circularix. Employees must make management aware of their family relationships in the workplace. Failure to comply may result in discipline.

If Circularix determines – at its sole discretion -- that romantic relationships, employment of relatives, and/or other relationships that are not specifically covered by this policy represent actual or potential conflicts of interest, Circularix may take whatever action it determines to be appropriate to avoid the actual or potential conflict of interest or problem. Such action may include, but is not necessarily limited to, transfers, reassignments, changing shifts, or, depending on the circumstances, disciplinary action up to and including possible termination.

J. DRUG & ALCOHOL ABUSE

The use of alcohol, illegal drugs, intoxicants, and controlled substances, whether on or off duty, can impair Employees' ability to work safely and efficiently. The Company prohibits the use of these substances to the extent that they affect, or have the potential to affect, the workplace. The Company will not jeopardize the safety of the Employee, other Employees, the public, and the Company operations due to an individual's poor judgment. Accordingly, the Company prohibits the following:

1. Possession use or being under the influence of alcohol or an illegal drug, intoxicant, or controlled substance during working hours.
2. Operating a vehicle, forklift, equipment, and/or other machinery owned or leased by the Company while impaired and/or under the influence of alcohol or an illegal drug, intoxicant, or controlled substance.
3. Distribution, sale, manufacture, or purchase--or the attempted distribution, sale, manufacture, or purchase--of an illegal drug, intoxicant, or controlled

substance during working hours or while on premises owned or occupied by the Company.

Marijuana. The Company will not penalize a person solely because of marijuana use unless in violation of applicable Federal or local law. Employees cannot use or be under the influence of marijuana (medical or otherwise) on Company property. Employees are prohibited from bringing any type of marijuana on company property. Any Employee suspected of possessing alcohol, an illegal drug, intoxicants, or a controlled substance is subject to inspection and search, with or without notice. Employees' personal belongings, including any bags, purses, briefcases, and clothing, and all Company property, are also subject to inspection and search, with or without notice. Employees who violate the Company's drug and alcohol abuse policy will be removed from the workplace immediately and taken to conduct a drug and/or alcohol test. If the Employee refuses to take the drug and/or alcohol test, may lead to disciplinary action, up to and including termination of employment. The employee will be suspended with or without pay pending the drug and/or alcohol results from the clinic. The Company may also bring the matter to the attention of appropriate law enforcement authorities. Any conviction for criminal conduct involving illegal drugs, intoxicants, or controlled substances, whether on or off duty or any violation of the Company's drug and alcohol abuse policy, including having a positive drug test result, may lead to disciplinary action, up to and including termination of employment.

The use of prescription drugs and/or over-the-counter drugs may also affect Employees' job performance and seriously impair Employees' value to the Company. Any Employee who is using prescription or over-the-counter drugs that may impair his or her ability to safely perform the job or may affect the safety or well-being of others must submit a physician's statement that the prescription drug use will not affect job safety. The Employee is not required to identify the medication or the underlying illness. Various federal, state, and local laws protect the rights of individuals with disabilities and others regarding the confidentiality of medical information, medical treatment, and the use of prescription drugs and substances taken under medical supervision. Nothing contained in this policy is intended to interfere with individual rights under, or to violate, these laws.

K. Reasonable Suspicion Testing

Circularix is committed to providing a safe, healthy, and productive workplace that is free from alcohol and unlawful drugs as classified under state, local, or federal laws, including marijuana, while employees are working on our premises and while operating employer-provided equipment and vehicles. This commitment is evidenced by Section V.J of this Employee Handbook, above, which details Circularix's rules regarding Drug & Alcohol Abuse.

While the use of marijuana has been legalized under some state laws for medical and/or recreational use, it remains an illegal drug under federal law and its use as it impacts the workplace is prohibited to the maximum extent permitted by state law. Circularix complies with all applicable state statutes and regulations and will not discriminate

against an employee or applicant based on their status as a person authorized to use marijuana. However, employees who work while under the influence of drugs (including marijuana) or alcohol pose a safety risk to themselves and others with whom they work.

In furtherance of this commitment, it is the policy of Circularix that job applicants and employees may be required to submit to drug and alcohol testing in certain situations. This policy is intended to comply with applicable laws regarding drug and alcohol testing and current and prospective employee privacy rights.

Testing Based on Reasonable Suspicion

Employees may be required to submit to a drug and alcohol test if an employee's supervisor or other person in authority has a reasonable suspicion, based on objective factors such as the employee's appearance, speech, behavior, or other conduct and facts, that the employee is impaired and/or under the influence of drugs or alcohol. Employees who take over-the-counter medication or other lawful medication that can be legally prescribed under both federal and state law should inform their supervisors or Human Resources if they believe the medication will impair their job performance, their own safety, or the safety of others, or if they believe they need a reasonable accommodation before reporting to work while under the influence of that medication. For more information on how to request a reasonable accommodation, please refer to our Disability Accommodations Policy in this Employee Handbook.

Whenever an employee displays objective criteria warranting reasonable suspicion, at least two (2) members of management and/or Human Resources must complete separate Reasonable Suspicion Observed Behavior Reports whenever possible. The Reasonable Suspicion Observed Behavior Reports are available in Human Resources and must be completed within twenty-four (24) hours of the observed behavior or before the results of the reasonable suspicion test are received, whichever is earlier.

Testing Procedures

All drug and alcohol testing under this policy will be conducted by an independent testing facility, which will obtain the individual's written consent prior to testing. Circularix will pay for the full cost of the test. Employees will be compensated at their regular rate of pay for time spent submitting to a drug and alcohol test required by Circularix.

Employees suspected of working while under the influence of illegal drugs or alcohol will be suspended with pay (if appropriate) until Circularix receives the results of a drug and alcohol test from the testing facility and any other information Circularix may require to make an appropriate determination.

Confidentiality

All records relating to an employee's or applicant's drug and alcohol test results will be kept confidential and maintained separately from the individual's personnel file.

Consequences of a Positive Test

Employees who test positive may be subject to discipline, up to and including immediate termination of employment. Job applicants who test positive may not be considered for hire or have their conditional job offers withdrawn.

Consequences for Refusing to Submit to Testing or Failing to Complete the Test

Employees who refuse to submit to testing as required by Circularix or who fail to complete the test will be terminated from employment. Job applicants who refuse to submit to drug and alcohol testing will be deemed to have withdrawn themselves from the application process and will no longer be considered for employment.

Circularix expressly reserves the right to change, modify, or delete the provisions of this Drug Testing in the Workplace Policy without notice.

If you have any questions regarding this policy or if you have questions about drug testing in the workplace that are not addressed in this policy, please contact the Human Resources Department.

L. PUNCTUALITY & ATTENDANCE

The Company expects you to report to work on a reliable and punctual basis. Absenteeism, early departures from work, and late arrivals burden your fellow Employees and the Company. If you are unable to report for work on any day, you must call the call out line and leave a message at least one hour before the time you are scheduled to begin working for that day. Failure to do so may result in disciplinary action. In all cases of absence or tardiness, Employees must provide site management with an honest reason or explanation. Employees must also inform site management of the expected duration of any absence. Absent justifying circumstances, you must call in on each day you are scheduled to work and will not report to work unless you are on an otherwise approved leave of absence.

The Company will comply with applicable laws relating to time off from work. It is your responsibility to provide enough information to enable the Company to assess the situation. You must notify site management of any change in your work status as soon as possible. If you are unable to reach site management, please contact Human Resources.

Circularix's punctuality and attendance policy are subject to the Company's Attendance Point System Rules. This system will track absenteeism and tardiness of non-exempt Employees at Circularix. Your reporting will maintain tracking of attendance infractions, whether tardy, leave early and/or absences, etc. Between your Supervisor and Human Resources conduct disciplinary actions if needed.

Points will be issued for occurrences of tardiness, leave early, or absences as follows:

½ Point: Clock in late/tardy

1 Point: Absence.

Not working scheduled shift

Failing to attend mandatory training or meetings

Late/tardy over half of your scheduled shift

Leaving early, working less than half of your scheduled shift

3 Points: First no call/no show, not giving any prior notification to shift for the absence or within 1 hour of the shift start time, not reporting for shift exchange, not reporting for other scheduled work such as mandatory training or meetings.

The Company retains the right to assess suspected violations of this policy on a case-by-case basis. For example, an employee who calls out of work sufficiently in advance of a scheduled shift to allow the Company to schedule someone else to work that shift may not be assessed attendance points. The Company encourages employees to provide as much advance notice as possible of any schedule change.

If the time clock is not working, report the problem to HR or site management immediately (the moment it occurs). Camera footage will be reviewed, and attendance points will be assessed or not assessed, according to surveillance video.

Absences may be compensated through vacation pay and/or unpaid sick day and points may be given depending on the circumstances, to the maximum extent permitted by state law. Only scheduled and previously approved Vacation time and approved sick leave are excused. Whether to compensate employees for absences is within the sole discretion of the Company and is separate from the assessment of attendance points under this policy, to the maximum extent permitted by state law.

No attendance points will be issued for an absence that is supported by Company Policy or any applicable federal, State, and/or local laws. For example, Employees with disabilities may be granted reasonable accommodation in complying with these policies if undue hardship does not result in the Company's operations. However, regular attendance and promptness are considered part of each Employee's essential job functions.

As explained above, the Company may offer Employees the ability to work a shift that is outside of their regularly scheduled hours. The Company expects each Employee who accepts such an offer to appear for the agreed-upon shift at the agreed-upon time. Any employee who breaches this expectation is subject to discipline, up to and including immediate termination.

This policy is subject to the Circularix progressive discipline system based on point accumulation as follows:

Step 1: Verbal Warning; accumulation of two (2) points within the past (12) months.

Step 2: Written Warning; accumulation of four (4) points within the past (12) months.

Step 3: Final Written Warning; accumulation of six (6) points within twelve (12) months or first no call/no show.

Step 4: Termination of Employment; seven (7) points within twelve months or the third no call/no show or three (3) days consecutive absences with no call/no show. Human Resources records will be reviewed prior to termination to ensure all absences are verified with Time and Attendance and Employee's employment file – if applicable.

This policy will be followed on a rotating 12-month period. In addition, continuing patterns of absences, early departures, or tardiness--regardless of the exact number of days--may warrant disciplinary action. If you fail to report for work without any notification to site management or HR within 72 hours, you may be considered to have abandoned your employment.

Nothing in this policy in any way changes and/or modifies the Employee's "at-will" status.

M. PERFORMANCE EVALUATIONS

Site Management will periodically review your performance and formally discuss it with you providing feedback and you the opportunity to discuss your job tasks, identify and correct weaknesses, encourage and recognize strengths and discuss methods for improving your performance. Your first performance evaluation will be made before or shortly after 90 continuous days of employment. After that review, you may receive an annual written performance evaluation. The frequency of performance evaluations may vary depending upon, among other things, length of service, job position, past performance, changes in job duties, or recurring performance problems. The Company does not guarantee that all Employees will receive performance evaluations, and these are conducted at the sole discretion of the Company.

For any job description of any job classification, the following may be considered during a performance evaluation, along with other factors: regular and reliable attendance; the ability to respond positively to direction and criticism of performance; the ability to work productively; teamwork; and the consistent compliance with Company rules.

Your performance evaluations may also review the quality and quantity of the work you perform, your knowledge of your job, your initiative, your work attitude, your attitude towards others, and your work ethic. The performance evaluation may also help you become aware of the progress you are making, the areas in which you need to improve, and objectives or goals for future work performance.

Please understand that a positive performance evaluation does not guarantee an increase in salary, a promotion, or even continued employment. Compensation increases and changes and the terms and conditions of employment, including job assignments, transfers, promotions, and demotions, are determined by and at the discretion of the Company.

In addition to these more formal performance evaluations, the Company encourages you and the site leadership to discuss your job performance on an ongoing basis.

N. DISCRETIONARY BONUSES

Bonuses may be given at the sole discretion of the management team. If bonuses are given, there is no express or implied promise that bonuses will be given at a specific time or for a specific amount or that all Employees will receive equal or proportionate bonuses.

O. PERSONNEL RECORDS

Employees may inspect their personnel file(s) in the presence of a company representative during regular business hours. Employees may also designate, in writing, an agent to inspect their personnel file. Employees will not be allowed to remove documents from their personnel file but may take notes during an inspection. In addition, any employee who disagrees with any information in his or her personnel file may submit a written statement to be included in the file.

Records subject to inspection include the following (to the extent maintained by the Company): applications for employment, wage or salary information, notices of commendation, warnings or disciplinary information, authorizations for deductions or withholding of pay, fringe benefit information, leave records, employment history with the Company including salary information, job title, dates of changes, retirement records, attendance records and performance evaluations.

The following records are not subject to inspection: records relating to the investigation of a possible criminal offense, letters of reference, documents that are being developed or prepared for use in civil, criminal, or grievance procedures, medical records, and information used by the Company to plan for future operations.

Employees who wish to review their personnel file should submit a written request to Human Resources. To assist the Company in providing employees with the correct records, an employee's written request should indicate the purpose for which the inspection is requested and/or the records the employee wishes to inspect or have inspected by an agent. Employees who wish to designate an agent to inspect the personnel file must also indicate that designation in the written request.

P. CONFIDENTIALITY

Information about the Company, its Employees, clients, suppliers, and vendors is to be kept confidential and divulged only to individuals within the Company with both a need to receive and authorization to receive the information. If in doubt as to whether information should be divulged, discuss the situation with Human Resources, Site Leadership, the CEO, President, or General Counsel.

All records and files maintained by the Company are confidential and remain the property of the Company. Records and files are not to be disclosed to any outside party without the express permission of the Circularix CEO or General Counsel. Confidential information includes, but is in no way limited to financial records; business, marketing, and strategic plans; information regarding customer accounts and transactions; pending projects or proposals; business plans and projections; the techniques used in, approach, or result of any market research; personnel and payroll records regarding current and former Employees, except for the Employee's own salary information or employment; the identity of, contact information for and any other account information on, clients, vendors and suppliers; and any other documents or information regarding the Company's operations, procedures or practices. Confidential information may not be removed from the Company premises without Management's express written authorization.

Every Employee:

1. Will regard and preserve the Information as highly confidential and the trade secrets of the Company.
2. Will not disclose, nor permit to be disclosed, any of the Information to any person or entity, absent written consent, and approval from the Company.
3. Will not photocopy or duplicate and will not permit any person to photocopy or duplicate, any of the Information without the Company's written consent and approval.
4. Will not make any use of Information for their own benefit or the benefit of any person or entity other than the Company.
5. Will return all Information to the Company immediately upon request for it; and
6. Will immediately contact the Company if any client of the Company contacts you after termination or resignation of your employment with the Company.

Care should be taken to avoid discussions between office personnel concerning confidential matters that might be overheard by third parties, particularly in elevators, restaurants, restrooms, or other public areas.

All documents and other items acquired by an Employee during employment are the property of the Company and are not to be copied (physically or electronically) or

removed from the premises without prior approval from the Circularix CEO or General Counsel, even if such removal is necessary for the Employee to perform his or her job.

No Employee shall release any document or other information in the possession of the Company either to a client, an attorney, a representative of the news media or to any other person not associated with the Company except with the prior written authorization from the Circularix CEO or General Counsel. All requests for documents or other information should be referred to Circularix CEO or General Counsel.

Employees of the Company may, from time to time, acquire information concerning clients or other matters which is not available to the public. The use or attempted use of such confidential inside information for personal financial gain or otherwise may be illegal or unethical, or both. Such information shall not be used for any reason.

In addition, the home telephone numbers or addresses of Company Employees may not be disclosed to any non-Employees, including clients. The Company's Employees may try to contact and relay a message to an absent Employee, but in no case, may an employee's telephone number or other personal information be given out to non-Employees.

Confidential information obtained during or through employment with the Company may not be used by any Employee for the purpose of furthering current or future outside employment or activities or for obtaining personal gain or profit. The Company reserves the right to avail itself of all legal or equitable remedies to prevent impermissible use of confidential information or to recover damages incurred as a result of the impermissible use of confidential information.

Employees may be required to enter into written confidentiality agreements confirming their understanding of the Company's confidentiality policies.

Any violation or negligent disregard of any of these policies will result in discipline, up to and including termination.

Q. EMPLOYEE DRESS, PERSONAL APPEARANCE & HYGIENE

Circularix is committed to creating a comfortable and productive work environment. All Employees are required to dress in a professional manner and are expected to report to work well groomed, clean, and dressed according to the requirements of their position. It is always extremely important that the Company's professional image be maintained.

Circularix T-shirts will be provided to production Employees on a limited basis and must be an appropriate size/fit (no baggy shirts, not too long/not too short, no holes and no excessive stains, etc.). Employees who are required to wear company-provided T-shirts must take care of their T-shirts and report any wear or damage to HR.

Circularix Polo shirts will be provided to Management and Supervisors on a limited basis and must be an appropriate size/fit. Instructions regarding cleaning and maintenance of shirts will be provided at the time of issuance.

When working on the production floor, all Employees are required to wear long pants (preferably jeans). Jeans must be an appropriate size/fit with no holes and no excessive stains. Safety-toe (Steel toe or composite toe) shoes must always be worn and will be slip-resistant. For Employees required to work around potentially energized electrical panels, the safety shoes must be non-conductive.

Employees working on the production floor are not allowed to wear:

- Jewelry of any kind including but not limited to rings (including wedding bands), necklaces, bracelets, ear, lip, nose rings, gauges/plugs, and watches. No surgically embedded/inserted jewelry.
- Long fingernails, fingernails with gemstones
- No open shirts, halter tops, tank tops, sleeveless shirts, low tops, or bare midriffs.
- Hoodies or hooded jackets (or any attire with strings or draw chords). These pose a safety concern, as you could be pulled into conveyors or trapped by other nipping-type manufacturing processes.
- Shorts, capri pants, dresses, or skirts.
- Pajamas worn as clothes, sweatpants/athletic pants, or leggings.

Under no circumstances will open-toe/open-heel shoes and/or high-heel shoes be allowed on the production floor.

When working in the office, a Casual business-like attire will be enforced. Professional sleeveless tops, skirts, and dresses are allowed in the office only. Office Employees entering the plant must wear appropriate clothing and shoes (see above production floor attire).

Office employees are never allowed to wear:

- T-shirts containing language that is harassing, discriminatory, obscene, violent, or threatening.
- Open shirts, halter-tops, tank tops, low-tops, bare midriffs, or mini-skirts more than 4 inches from the knees.
- Pajamas that are worn as clothes, no sweatpants/athletic pants.

Employees are prohibited from wearing heavy perfume or cologne, and/or

maintain any foul body odor while at work. We understand that our plant can expose employees to hot temperatures, causing them to perspire. We are happy to provide hygiene products that are available for use per your comfort level. Please make sure all items are returned after use and alert Human Resources if product level gets low.

If an Employee needs an exception to the above policy or reasonable accommodation for religious or disability reasons, the Employee should contact Human Resources and request the same as soon as possible.

Repeated violation of this policy may result in disciplinary action, up to and including, termination of employment.

R. PUBLICITY/STATEMENTS TO THE MEDIA

All media inquiries regarding the Company and its operations must be referred to the Circularix CEO, President, or CFO.

S. CUSTOMER RELATIONS

We are a service business and all of us must remember that the customer always comes first. It is the customer that pays all our wages. Remember, while the customer is not always right, the customer is never wrong.

Customers are always treated courteously and given proper attention. Never regard a customer's question or concerns as an interruption or an annoyance. Customer inquiries, whether in person or by telephone, must be addressed promptly and professionally.

Through your conduct show your desire to assist the customer in obtaining the help he or she needs. If you are unable to help a customer, find someone who can.

VI. THE COMPANY FACILITIES

A. CELL PHONE SAFETY

Encouraging Employees to Pull Over. Employees driving while during their employment are always required to observe all vehicle and traffic regulations and operate the vehicle in a safe, courteous and responsible manner. This always includes wearing seat belts and ensuring passengers do as well. The Company expects Employees whose job responsibilities include regular or occasional driving and who use a cell phone for business use to refrain from using their phone while driving. Safety must come before all other concerns. Regardless of the circumstances, including slow or stopped traffic, the Company strongly encourages Employees to pull over to the side of the road and safely stop the vehicle before placing or accepting a call. If Employees must take or make a phone call, they must use a hands-free option such as a headset or speaker phone. No Employee shall use an iPhone, Blackberry, or other smartphone/PDA device while driving. Under no circumstances are Employees to place themselves or others at risk to fulfill

business needs. Employees who are charged with traffic violations resulting from the use of their phones while driving will be solely responsible for all liabilities that result from such actions. Violations of this policy will be subject to disciplinary actions, up to and including termination of employment.

B. HEALTH & SAFETY

1. Safety Policy

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

Circularix maintains an Illness and Injury Prevention Program which may be reviewed, as well as the Hazard Communication Plan including Safety Data Sheets (SDS) on the production floor or in the front office. Circularix also maintains a Fire Prevention Plan and an Emergency Action Plan communicated and available to all Employees.

In addition, Circularix must rely upon our Employees to ensure that work areas are kept safe and free of hazardous conditions. Employees should be conscientious about workplace safety including proper operating methods and known dangerous conditions or hazards. Employees should report any unsafe conditions or potential hazards to their leadership *immediately*, even if the employee believes they have corrected the problem. If you suspect a concealed danger is present on the Company's premises, or in a product, facility, piece of equipment, process, or business practice for which the Company is responsible, bring it to the attention of leadership or Human Resources *immediately*. You must report any unsafe conditions or potential hazards to site leadership or Human Resources *immediately*.

Periodically, Circularix may issue rules and guidelines governing workplace safety and health. Circularix may also issue rules and guidelines regarding the handling and disposal of hazardous substances and waste. All Employees should familiarize themselves with these rules and guidelines as strict compliance will be expected. Contact site leadership or HR for copies of current rules and guidelines if you do not have them. They are also available electronically on the site share.

Failure to strictly comply with rules and guidelines regarding health and safety or negligent work performance which endangers health and safety will not be tolerated and Employee is subject to disciplinary action up to and including termination.

Any workplace injury, accident, or illness *must* be reported to site leadership or HR as soon as possible, regardless of the severity of the injury or accident. If medical attention is required immediately, Management will assist Employees in obtaining medical care, after which the details of the injury or accident must be reported.

2. General Safety Rules

The following safety rules were established to provide continuity in the effort to prevent on-the-job injuries. They are applicable to all Circularix Employees. Compliance with them is mandatory, and a condition of employment. Violations will result in disciplinary action up to and including termination of employment.

1. Stop and ask site leadership for assistance if you don't understand how to perform a task safely.
2. Perform a task only if you have been sufficiently trained, have the necessary tools and equipment, and have been authorized to do so.
3. Follow specified job procedures, safety rules, and instructions, signs, and labels.
4. Use personal protective equipment appropriate for the area or task. Employees working in the production area must wear Company approved Safety Shoes (slip and chemical resistant, grounded steel toe), Bump Caps, Ear Plugs, and Safety Glasses. Safety Vests as required. Specialized PPE must be worn in areas requiring further personal protection, such as goggles, face shields, heat resistance wear, gloves, chemical-resistant gloves, and aprons, and/or face masks.
5. Keep guardrails, guards, and access panels in place and properly adjusted.
6. Disabling or attempting to bypass any safety device or feature is prohibited.
7. Do not repair or alter any machine, tool, electrical device, or other equipment or systems unless you have been trained and specifically authorized to do so. Only Maintenance or Engineering Employees are authorized to open electrical cabinets.
8. Do not place any part of your body in hazardous areas of equipment, near moving parts or objects, or near energy sources unless the written energy isolation (lockout & tag out) procedure has been implemented.
9. Employees must wear clothing appropriate to their work assignments. Clothing will be in reasonably good condition and clean.
10. It is your responsibility to shut down and lock out unsafe equipment or processes if a hazard cannot be otherwise controlled.
11. The use of alcohol or illegal drugs, or medication that impairs your ability to work safely is prohibited.

12. Horseplay, physical fighting, running, or any other physical conduct that is unsafe or that could result in injury is prohibited.
13. Do not drive a forklift unless you have received a certification that allows you to do so. Do not operate a forklift if you have deemed it unsafe to operate.
14. If you observe a hazard, correct it if you can do so safely; if not, block the area and tell site leadership or HR.
15. All injuries and near-miss incidents must be reported immediately.
16. No radios, headphones, mp3 players, or any music device and personal cell phones (exceptions for authorized persons only) are allowed on the production floor.
17. Jewelry such as rings, pendants, necklaces, earrings, wedding bands with gems, and watches shall not be worn on the production floor and around machinery or electrical equipment. See cGMP Policy for more details.
18. When lifting objects lift with your knees and not your back.
19. Forklift speed is a maximum of 5 miles an hour. You must wear the forklift seatbelt. Please use the horn in blind spots, coming around corners, and when pedestrians are present.
20. Use a safety harness in applicable areas.

C. CARDINAL RULES

At Circularix, Cardinal Rules are a set of rules which are fundamentals in any successful safety process. They are fundamentally important, as breaking these rules could result in disabling consequences for an individual or critical loss for the Circularix facility.

Circularix maintains (at a min) the following five (5) Cardinal Rules. Personnel will be held accountable. Breaking these rules will have serious consequences up to termination of employment.

1. Lock Out Tag Out Policy:

- a. Failure to lock out equipment or control energy in accordance with the level of personal training an individual has received.
- b. Any work requiring you to be in the machine's "Line of Fire" requires the machine to be locked out. You must always assess your activities and ensure that you are not in the machine's "Line of Fire" unprotected.

- c. A lock and tag with the employee's name and the area must be used to lock out equipment.

2. Confined Space Entry Policy:

- a. Before entering a permit-required confined space, a Confined Space Permit must be obtained.
- b. Entering a permit-required confined space without proper training and without first obtaining proper authorization from the site GM or authorized representative to a Confined Space Entry Process is a violation.

3. Fall Protection Policy:

- a. Work performed at a vertical height of four (4) feet or greater requires that the employee be protected against an unexpected fall. Examples of protection include platform railings or fall protection harnesses and lanyards/self-retracting lanyards.
- b. Work performed from a ladder less than 20 ft. in height is excluded from this policy so long as there are no other hazards present.
- c. When operating aerial or scissor lifts, operators must attach their safety lanyard to the approved tie-off point on the lift.

4. Altering a Safety Device Policy:

- a. If an employee tampers with or makes inoperative any safety equipment or devices such as guards, interlocks, lockout tags and locks, emergency stop devices, fire extinguishers, or fire hoses to evade the intent of these safety devices is a violation.

5. Hot work Process (Arc Flash PPE) Policy:

- a. Prior to any work being conducted on the plant premises which could result in flame and or spark a Hot Work Permit must be authorized by Safety Manager
- b. Prior to any work being conducted on the plant premises, proper PPE is required to be used.
- c. These types of activities include welding, cutting, grinding, or any other activity that produces a spark or flame.

Only perform tasks for which you have been trained and validated to perform safely. You have the right and duty not to perform tasks on which you have not been trained and validated. Managers have an equal responsibility to ensure employees are not assigned

to perform tasks they have not been trained and validated to perform safely.

Any instance of an observed or reported violation of Circularix Cardinal Rules will be promptly investigated and appropriate measures will be taken.

1. Safety Disciplinary Process

For each violation of the safety program, Management will take appropriate action, which may include any level of discipline, up to and including immediate termination of employment.

D. USE OF TECHNOLOGY

The Company's technical resources--including desktop and portable computer systems, fax machines, voice mail, electronic mail (e-mail), and Internet access--enable Employees quickly and efficiently to access and exchange information throughout the Company and around the world. When used properly, we believe these resources greatly enhance Employee productivity and knowledge. In many respects, these new tools are like other Company tools, such as stationery, file cabinets, photocopiers, and telephones. Because these technologies are rapidly changing, it is important to explain how they fit within the Company and within your responsibilities as an Employee.

This policy applies to all technical resources that are owned or leased by the Company, that are used on or accessed from Company premises, or that are used on Company business. This policy also applies to all activities using any Company-paid accounts, subscriptions, or other technical services, such as Internet access, voice mail, and e-mail, whether the activities are conducted from Company premises.

NOTE: As you use the Company's technical resources, it is important to remember the nature of the information created and stored there. Because they seem informal, electronic messages are sometimes offhand, like a conversation, and not as carefully thought out as a letter or memorandum. Like any other document, an electronic message or other computer information can later be used to indicate what an Employee knew or felt. You should keep this in mind when creating electronic messages and other documents. Even after you delete an electronic message or close a computer session, it may still be recoverable and may even remain on the system.

1. Acceptable Uses and Unacceptable Uses

The Company's technical resources are provided for the benefit of the Company. These resources are provided for use in the pursuit of Company business and are to be reviewed, monitored, and used only in that pursuit, except as otherwise provided in this policy.

Employees are not permitted to use the Company's technical resources for non-work purposes during work time. Employees have no right of privacy as to any

information or file maintained in or on the Company's property or transmitted or stored through the Company's computer, voice mail, or telephone systems.

Your use of the Company's technical resources must not interfere with your productivity, the productivity of any other Employee, or the operation of the Company's technical resources. Solicitation for any non-Company business or activities using Company resources is strictly prohibited.

You should not send communications that either mask your identity or indicate that they were sent by someone else. You should never access any technical resources using another Employee's password. Similarly, you should only access the libraries, files, data, programs, and directories that are related to your work duties. Unauthorized review, duplication, dissemination, removal, installation, damage, or alteration of files, passwords, computer systems or programs, or other property of the Company, or improper use of information obtained by unauthorized means, is prohibited.

Sending, saving, or viewing offensive material is prohibited. Messages stored and/or transmitted by computer, voice mail, or telephone systems must not contain content that may reasonably be considered offensive to any Employee. Offensive material includes, but is not limited to, sexual comments, jokes or images, racial slurs, gender-specific comments, or any comments, jokes, or images that would offend someone on the basis of his or her race, color, creed, sex, gender identity/expression, sexual orientation, religion, age, ancestry, national origin, veteran status, marital or registered domestic partner status, physical or mental disability, medical condition, genetic characteristics as well as any other category protected by federal, state or local laws. Any use of the Company's technical resources to harass or discriminate is unlawful and strictly prohibited by the Company. Violators will be subject to discipline, up to and including termination of employment.

The Company does not consider conduct in violation of this policy to be within the course and scope of employment or the direct consequence of the discharge of one's duties. Accordingly, to the extent permitted by law, the Company reserves the right not to provide a defense or pay damages assessed against Employees for conduct in violation of this policy.

2. Access to Information

The Company asks you to keep in mind that when you are using the Company's computers you are creating Company documents using a Company asset. The Company respects the individual privacy of its Employees. However, that privacy does not extend to an Employee's work-related conduct or to the use of Company-provided technical resources or supplies.

The Company's computer (including email and instant messages), voice mail, or telephone systems, and the data stored on them, are always and remain the property of the Company. As a result, computer data, voice mail messages, and other data are readily

available to numerous persons. If during your employment, you perform or transmit work on the Company's computer system and other technical resources, your work may be subject to the investigation, search and review of others in accordance with this policy.

All information (including email and instant messages) that is created, sent, or retrieved over the Company's technical resources is the property of the Company and should not be considered private or confidential. Employees have no right to privacy as to any information or file transmitted or stored through the Company's computer, voice mail, or telephone systems. Any electronically stored information that you create, send to, or receive from others may be retrieved and reviewed when doing so serves the legitimate business interests and obligations of the Company. Employees should also be aware that, even when a file or message is erased, it is still possible to recreate the message. The Company reserves the right to monitor your use of its technical resources at any time. All information including text and images may be disclosed to law enforcement or to other third parties without the prior consent of the sender or the receiver.

3. Copyrighted Materials

You should not copy and distribute copyrighted material (e.g., software, database files, documentation, articles, graphics files, and downloaded information) by any means unless you have confirmed in advance from appropriate sources that the Company has the right to copy or distribute the material. Failure to observe copyright may result in disciplinary action by the Company as well as legal action by the copyright owner. Any questions concerning these rights should be directed to Management.

4. Confidential Information

E-mail and Internet access are not entirely secure. Others outside the Company may also be able to monitor your e-mail and Internet access. For example, Internet sites maintain logs of visits from users; these logs identify which company, and even which person, accessed the service. If your work using these resources requires a higher level of security, please ask Management for guidance on securely exchanging e-mail or gathering information from sources such as the Internet.

All Employees should safeguard the Company's confidential information from disclosure. Do not access new voice mail messages with others present. Messages containing confidential information should not be left visible while you are away from your work area.

Electronic messages containing confidential information should include a statement like the following, in all capital letters, at the top of the message: **CONFIDENTIAL: UNAUTHORIZED USE OR DISCLOSURE IS STRICTLY PROHIBITED.**

5. Security of Information

Although you may have passwords to access computer and voice mail systems, these technical resources belong to the Company, are always to be accessible by the Company, and are subject to inspections by the Company, with or without notice. The Company may override any applicable passwords or codes to inspect, investigate or search an employee's files and messages. All passwords must be made available to Management upon request. You should not provide a password to other Employees or to anyone outside the Company and should never access any technical resources using another Employee's password.

In order to facilitate the Company's access to information on its technical resources, you may not encrypt or encode any voice mail communication, or any other files or data stored or exchanged on the Company systems without the express prior written permission from Management. As part of this approval, Management will indicate a procedure for you to deposit any password, encryption key, or code or software with Management so that the encrypted or encoded information can be accessed in your absence.

6. The Company's Software Policy

If you want to install software on the Company computers, you must contact Management and request to have the software installed. Employees are prohibited from installing any software on any Company technical resource without express prior written permission from Management.

Involving Management ensures that the Company can manage the software on the Company systems, prevent the introduction of computer viruses and meet its obligations under any applicable software licenses and copyright laws. Computer software is protected from unauthorized copying and use by federal and state law; unauthorized copying or use of computer software exposes the Company and the individual Employee to substantial fines and exposes the individual Employee to imprisonment. Therefore, Employees may not load personal software onto the Company's computer system and may not copy software from the Company for personal use.

7. Your Responsibilities

Each Employee is responsible for the content of all text, audio, or images that they place or send over the company's technical resources. Employees may access only files or programs, whether computerized or not, that they have permission to enter.

Violations of any guidelines in this policy may result in disciplinary action, up to and including termination of employment. In addition, the Company may advise appropriate legal officials of any illegal violations.

Nothing in this policy is intended to interfere with Employee rights under the National Labor Relations Act and/or other applicable laws.

E. CIRCULARIX'S SOCIAL MEDIA POLICY

Circularix understands that social media sites have joined the mainstream of day-to-day communications and allow participants to share and receive various kinds of information. At the same time, it expects Employees to understand the impact that social media can have on a Company's reputation, clients, co-workers, and Company business relationships. Because postings and communications transmitted on these sites can potentially have a more powerful impact than statements made directly to another person who is in the same room, Circularix has established guidelines to assist Employees to understand examples of conduct that is impermissible.

This policy reflects Circularix's commitment to meet its legal obligations and interests. The policy emphasizes the importance of common sense and exercising good judgment. In keeping with this premise, Employees must follow the same standards that apply to other activities and behavior when communicating on social media sites or online.

General Guidelines:

1. Employees are prohibited from using any social media, such as blogs and/or Twitter to provide any professional comment and/or advice that could in any respect be construed as being issued by the Company without express written permission by the Circularix CEO or President.
2. Express only your personal opinions. Never represent yourself as a spokesperson for Circularix. If Circularix is a subject of the content you are creating, be clear and open about the fact that you are an associate or Employee of the Company and make it clear that your views do not represent those of Circularix, fellow associates, members, clients, suppliers, or people working on behalf of Circularix. If you do publish a blog or post online related to the work you do or subjects associated with Circularix, make it clear that you are not speaking on behalf of the Company. It is best to include a disclaimer such as "The postings on this site are my own and do not necessarily reflect the views of Circularix."
3. Employees are expected to use Company resources during their working time in an appropriate manner and not to interfere with the optimum performance of their job.
4. Employees must always comply with Circularix's policies against workplace violence, unlawful harassment, and discrimination. Employees can use their own personal devices to engage in social media during breaks and meal periods, away from the plant floor. Consistent with these policies, Employees should never participate in communications in a manner that unlawfully harasses or discriminates against another

Employee, client, supplier, or vendor based on that individual's race, color, creed, sex, gender identity/expression, sexual orientation, religion, age, ancestry, national origin, veteran status, marital or registered domestic partner status, physical or mental disability, medical condition, genetic characteristics as well as any other category protected by federal, state or local laws.

5. Circularix maintains significant efforts to protect its confidential, proprietary information and trade secrets as defined in this Employee Handbook. Employees should never post, share or improperly disclose or disseminate such information to outsiders or third parties.

6. Employees should not use the Circularix logo, letterhead, or name when communicating on social media sites without the express permission and approval of the Circularix CEO or President if doing so would suggest that the views expressed are those of the Company or that the Company endorses the views expressed.

Violation of this policy may lead to disciplinary action, including but not limited to, termination of employment.

Nothing in this policy is intended to interfere with Employee rights under the National Labor Relations Act and/or other applicable laws.

F. BULLETIN BOARDS

Bulletin boards are reserved for the exclusive use of Circularix for posting work-related notices or notices which must be posted pursuant to local, state, and federal law. From time to time, special notices and information for Employees will be posted by Circularix on the bulletin boards. Please check the boards regularly for such notices. Employee postings are not permitted.

G. SOLICITATION & DISTRIBUTION OF LITERATURE

The Company has established rules, applicable to all Employees, to govern solicitation and distribution of written material during working time and entry onto the premises and work areas. All Employees are expected to comply strictly with these rules.

1. No Employee shall solicit or promote support for any non-work-related cause or organization during his or her working time or during the working time of the Employee or Employees at whom the activity is directed.

2. No Employee shall distribute or circulate any written or printed non-work-related material in work areas at any time, during his or her working time, or during the working time of the Employee or Employees at whom the activity is directed; and

3. Under no circumstances will non-Employees be permitted to solicit or to distribute written material for any non-work-related purpose on Company property.

As used in this policy, "working time" includes all time for which an Employee is paid and/or is scheduled to be performing services for the Company; it does not include break periods, meal periods, or periods in which an Employee is not, and is not scheduled to be, performing services or work for the Company.

Nothing in this policy is intended to interfere with Employee rights under the National Labor Relations Act and/or other applicable laws.

H. USE OF COMPANY EQUIPMENT

All Company property--including machinery, equipment, desks, storage areas, lockers, work areas, file cabinets, credenzas, computer systems, office telephones, cellular telephones, modems, facsimile machines, and copiers--must be used properly and maintained in good working order. Employees who lose, steal or misuse Company property may be personally liable for replacing or fixing the item and may be subject to discipline, up to and including discharge.

The Company reserves the right, always and without prior notice, to inspect and search all its property for the purpose of determining whether this policy or any other policy of the Company has been violated, or when an inspection and investigation is necessary for purposes of promoting safety in the workplace or compliance with state and federal laws. These inspections may be conducted during or after business hours and in the presence or absence of the Employee.

In addition, in order to ensure the safety and security of Employees, and to protect the Company's legitimate business interests, the Company reserves the right to question and inspect or search any Employee or other individual entering onto or leaving the Company premises. The inspection or search may include any packages or items that the individual may be carrying, including briefcases, handbags, knapsacks, shopping bags, etc. These items are subject to inspection and search at any time, with or without prior notice. The Company also may require Employees while on the job or on the Company's premises to agree to the reasonable inspection of their personal property and/or persons. The individual may be requested to self-inspect his or her personal property or person by displaying the contents of any packages and/or turning out his or her pockets, etc., in the presence of a representative of the Company, typically a Management Employee of the same gender. The Company will not tolerate any Employee's refusal to submit to a search.

Employees have no right of privacy as to any information or file maintained in or on the Company property or transmitted through the Company. For purposes of inspecting, investigating, or searching Employees' files or documents, the Company may override any applicable passwords, codes, or locks in accordance with the best interests of the Company, its Employees, or visitors. All bills and other documentation related to the use of the Company equipment or property are the property of the Company and may be reviewed and used for purposes that the Company considers appropriate.

Employees may access only files or documents that they have permission to enter. Unauthorized review, duplication, dissemination, removal, damage, or alteration of files or other property of the Company, or improper use of information obtained by unauthorized means, may be grounds for disciplinary action, up to and including discharge.

I. EMPLOYEE PROPERTY AND LOCKERS

Employees should not bring valuables to work. If necessary, to do so, all valuables should be kept in a secure location. The Company assumes no responsibility for the loss, theft, or damage of Employees' personal property including items stored in lockers provided by the Company.

Lockers are the property of the Company and are available to Employees in our facility on a limited basis and are assigned by Human Resources. Employees may supply personal locks for personal locker storage. Employees are to store only their personal belongings apart from any food items, weapons, etc. which are strictly prohibited. Loss of any personal items pertaining and/or belonging to the Employee is not the responsibility of the Company. Loss of any Company issued PPE, equipment, etc. to the Employee stored in their locker is the responsibility of the Employee to ensure their lock is properly secured.

J. RIGHT TO OBSERVE EMPLOYEES

In our ongoing effort to achieve the highest level of business efficiency and client service, the Company reserves the right to observe Employees throughout the Company's premises, either by way of direct observation or using electronic devices. The Company may install video cameras to monitor reception areas, work areas, and/or other generally open areas where Employees may be seen by others. Therefore, Employees shall have no expectation of privacy in the workplace, except for restrooms.

K. SECURITY

You should always be alert and should report the presence of any suspicious persons to Management immediately. You must also immediately notify management of the loss of keys and/or access cards.

L. VISITORS

Friends and relatives should be asked not to visit Employees during working hours. Unattended children are not allowed on Company premises at any time. Unauthorized personnel are not allowed on Company premises at any time. For safety and insurance reasons, friends, relatives, and customers are not permitted in certain work areas. All visitors must enter through the Company's main lobby.

M. PARKING

Parking is provided free to Employees. Employee vehicles may be parked in designated areas. Employees may not use parking areas specifically designated for trailers. Circularix advises Employees to always lock their cars. Circularix assumes no responsibility for damage to cars or for loss of personal property while on Circularix premises or while being used on Circularix business.

N. HOUSEKEEPING

Under the plant's GMP (Good Manufacturing Practices), all Employees are expected to keep their work areas clean and organized. Common areas such as lunchrooms, locker rooms, and restrooms should be kept clean by those using them. Please clean up after meals. Dispose of trash properly. Absolutely no food is allowed on the production floor. For further information, please refer to the GMP Rules.

O. TELEPHONES

While you are at work, you are expected to perform your job duties and responsibilities. Personal calls, both incoming and outgoing, are not permitted except in emergencies. Long-distance calls are prohibited absent the express approval of Management. For emergency phone calls, please call 911 and then report to Management. Employees are encouraged to limit personal telephone calls to break times. Cell phone use is limited to authorized personnel only on the production floor. All unauthorized cell phone use on the production floor may be subject to disciplinary action.

P. SMOKING POLICY

In keeping with Circularix's intent to provide a safe and healthful work environment, the Company prohibits smoking and the use of tobacco products inside the Company building and the entrances to the building, including, but not limited to, immediately adjacent to the front door. Individuals who desire to smoke can do so in a designated area outside of the plant, in compliance with applicable law. This policy applies equally to visitors.

VII. BENEFITS

A. HOLIDAYS

Circularix generally observes the following holidays:

New Year's Day	Memorial Day	Independence Day	Labor Day
Thanksgiving Day	Thanksgiving Day After	Christmas Eve	Christmas Day

*Check the updated yearly holiday calendar from Human Resources, and please keep in mind that it is subject to change.

The Company may also observe additional holidays each year. When a holiday falls on a weekend, it will be observed on either the nearest Friday or the Monday as determined by the Company. A List of Company Observed Holidays will be provided to Employees at the beginning of each calendar year. Full-time Employees are eligible for holiday pay. Part-time Employees and Temporary Employees are not eligible for holiday pay.

Eligibility for holiday pay begins after completion of the Employee's Introductory Period. To be eligible for holiday pay, Employees must be regularly scheduled to work on the day on which the Company Observed Holiday falls and must work their scheduled working day immediately preceding and the scheduled working day immediately following the holiday, unless an absence on either day is approved in writing two (2) weeks in advance by management or unless the reason for the absence is legally protected. Holiday pay is paid as 8 hours of straight-time pay.

Circularix will try to accommodate the day off for a Company Observed Holiday but due to the nature of our business, Employees may have to work on Company Observed Holidays, and should this happen, the employee will receive holiday pay in addition to their normal pay entitlement.

Holiday pay is not counted for the purpose of calculating an employee's overtime hours of work or overtime premiums unless required by federal, state, or local laws.

If a Company Observed Holiday occurs during your vacation period, eligible Employees will be granted one (1) additional day of the vacation period, to be taken at a time approved in advance by the Company.

Religious Holidays. The Company recognizes your right to worship as you see fit. You may request time off without pay to attend special religious services or observe religious holidays, but you may use accrued but unused vacation. The Company will make every effort to accommodate all reasonable requests for such time off.

B. VACATIONS

It is Circularix's policy to provide paid vacation time to eligible Employees for rest, recreation, and travel. Circularix believes that vacation days are essential to the Employees' personal well-being and productivity, both of which are in the best interests of Circularix and its Employees. Full-time Employees begin to accrue vacation time from his/her first day of work in accordance with the schedule below on an anniversary basis, however, they must wait until the completion of their Introductory Period before taking earned vacation days. Part-time Employees and Temporary Employees are not entitled to paid vacation time.

The following vacation schedule applies to **Regular Full-Time Non-Exempt Employees paid bi-weekly**:

Length of Service	Vacation Days Per year	Earning Rate
1 to 5 years	2 weeks (80 hours)	3.08 hours per paycheck
5 to 10 years	3 weeks (120 hours)	4.62 hours per paycheck
10 to 15 years	4 weeks (160 hours)	6.15 hours per paycheck

Employees are encouraged to take their accrued vacation before their next anniversary. Unused vacation may be carried over into the following anniversary year subject to the maximum accrual amount of 240 hours. Once the maximum accrual amount has been reached, no additional paid vacation will be earned until previously accrued paid vacation is used. If for some reason an employee is unable to take vacation due to the explicit request of such employee's manager or other member of the senior management team, the Company may permit such employee to cash out the amount of employee requested vacation, up to 40 hours. The payout must be approved by Company management and the requesting employee must have 80+ hours of accrued vacation banked.

You will not be given retroactive credit for any period in which you did not accrue paid vacation because you were at the maximum.

Employees are encouraged to take their accrued vacation each year. You must request vacation as far in advance as possible (at least two (2) weeks in advance) and obtain the approval of management. Vacation requests will be approved and scheduled to provide adequate coverage of job and staff requirements. When several Employees in the same department request the same dates for vacation and not all can be accommodated, management will approve vacation on a first-request basis. The Company will make the final determination in this regard in its sole discretion.

Employees who take vacation time are not expected to work during such vacation time. To the extent that any Employee believes that he or she needs to work during a time period previously-approved as vacation time, such Employee must contact Human Resources. Circularix reserves the right to determine whether any Employee will be permitted to cancel any pre-approved vacation time.

Except in extraordinary situations as determined in the sole discretion of the Company, Circularix will not advance vacation time not yet accrued.

Vacation pay will be at the base rate of pay in effect at the time the vacation is taken.

If a Company-recognized holiday falls within the Employee's vacation pay period, the holiday will not be counted as a vacation day.

Eligible Employees will be paid their unused vacation at the end of their employment at their then-current hourly rate of pay in accordance with applicable law.

Vacation does not accrue during unpaid leaves of absence or other periods of inactive service. Paid vacation time is not counted as hours worked for the purpose of computing overtime.

If an Employee does not return to work upon completion of any vacation period, the Employee will be deemed to have voluntarily resigned his/her employment.

C. For further information about this policy, please contact Human Resources. RETIREMENT PLAN (401k)

The Company currently provides a 401K Plan for eligible Employees in order to assist Employees in planning for their retirement. For information regarding eligibility, contributions, and benefits, please contact Human Resources.

D. EMPLOYEE BENEFITS

1. Medical Insurance

Currently, Circularix provides health insurance coverage under the Company's group health insurance coverage. Please contact Human Resources for eligibility and additional details. Copies of the Plan Document and Summary Plan Description are available from Human Resources.

2. Life Insurance

Circularix provides life insurance coverage to eligible Employees. Please contact Human Resources for eligibility and additional details. Copies of the Plan Document and Summary Plan Description are available from Human Resources.

3. Workers' Compensation

If you are injured or become ill on the job, then you may receive, at no cost to you, workers' compensation insurance benefits which may include medical care, compensation, and vocational rehabilitation. To receive workers' compensation benefits, you must:

- a. Report any work-related injury to Management immediately (and no later than 24 hours after the incident).
- b. Complete a written claim form and return it to Management.
- c. Seek medical treatment and follow-up care if required.

The law requires that the Company notify the workers' compensation insurance company of any concerns of false or fraudulent claims. Any person who makes or causes

to be made any knowingly false or fraudulent material statement or material misrepresentation for the purpose of obtaining or denying workers' compensation benefits or payments is guilty of a felony and will be immediately terminated from employment. A violation of this law is punishable by imprisonment or by a fine. Additional civil penalties may be in order.

E. LEAVES OF ABSENCE

1. General Provisions

Employees may use unpaid personal leave for their own health conditions or preventative care. Employees can also use unpaid personal leave for care of their immediate family (parents, spouse and children only).

At the discretion of Circularix, and employee may request an additional unpaid personal leave of absence without pay for up to fifteen (15) calendar days may be granted to Employees who have worked at least six (6) months of continuous employment. Personal leaves of absence are based on a rolling 12-month calendar.

Unused unpaid personal days (or hours) do not carry over to the following year. Circularix has established a minimum usage for an unpaid personal leave of two-hour increments.

You should notify Human Resources in writing as soon as you become aware that you may need a leave of absence. When requesting any type of leave, please complete the Circularix Time Off Request form. The Company will consider your request in accordance with applicable law and the Company's leave policies. Depending on the circumstances, Circularix may request verification from the Employee under this policy. The Company may also request that the Employee provide a note from his/her physician attesting that the Employee is able to perform the essential functions of his/her job before returning to work.

You will be notified whether your leave request is granted or denied. If you are granted leave, you must comply with the terms and conditions of the leave, including keeping in touch with Human Resources during your leave, and giving prompt notice if there is any change in your return date.

You must not accept other employment or apply for unemployment insurance while you are on a leave of absence. Acceptance of other employment while on leave will be treated as a voluntary resignation from employment at the Company. Benefits, such as vacation and holidays, will not accrue while you are on a leave of absence. Reinstatement following a leave of absence will be governed by applicable federal, state, and/or local laws.

You may be required to use accrued vacation with an unpaid leave of absence. Accrued sick leave benefits may be used during non-job-related medical leaves, occupational medical leaves, and pregnancy or disability leaves.

You will not receive service credit (except as required by applicable federal, state, and/or local laws) for the time during the leave, except that you will retain your original date of hire.

An Employee returning from a personal leave will be offered the same position held at the time of leaving, if available. If this position is not available, a comparable position will be offered. If neither the same nor a comparable position is available, your return to work will depend on job openings existing at the time of your scheduled return. There are no guarantees of reinstatement, and your return will depend on your qualifications for existing openings.

The Company may hold in abeyance or proceed with any counseling, performance review, or disciplinary action, including discharge, that was contemplated prior to any Employee's request for or receipt of a leave of absence or that has come to the Company's attention during the leave. If any action is held in abeyance during the leave of absence, the Company reserves the right to proceed with the action upon the Employee's return. Requesting or receiving a leave of absence in no way relieves Employees of their obligation while on the job to perform their job responsibilities capably and up to the Company's expectations and to observe all the Company policies, rules, and procedures.

2. Family and Medical Leave Act

Circularix will provide Family and Medical Leave Act (FMLA) leave to its eligible employees. The company posts the mandatory FMLA Notice and upon hire provides all new employees with notices required by the U.S. Department of Labor (DOL) on Employee Rights and Responsibilities under the Family and Medical Leave Act.

The function of this policy is to provide employees with a general description of their FMLA rights. In the event of any conflict between this policy and the applicable law, employees will be afforded all rights required by law.

If you have any questions, concerns, or disputes with this policy, you must contact Human Resources (see site telephone directory for numbers and emails).

A. General Provisions

Under this policy, Circularix will utilize a "rolling" 12-month period measured backward – a 12-month period measured backward from the date an employee uses any FMLA leave. Under the "rolling" 12-month period, each time an employee takes FMLA leave, the remaining leave entitlement would be the balance of the 12 weeks which has not been used during the immediately preceding 12 months. The leave may be paid, unpaid, or a combination of paid and unpaid leave, depending on the circumstances of the leave and as specified in this policy.

B. Eligibility

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

- 1) The employee must have worked for the company for 12 months or 52 weeks. The 12 months or 52 weeks need not have been consecutive. Separate periods of employment will be counted, provided that the break in service does not exceed seven years. Separate periods of employment will be counted if the break in service exceeds seven years due to National Guard or Reserve military service obligations or when there is a written agreement, including a collective bargaining agreement, stating the employer's intention to rehire the employee after the service break. For eligibility purposes, an employee will be considered to have been employed for an entire week even if the employee was on the payroll for only part of a week or if the employee is on leave during the week.
- 2) The employee must have worked at least 1,250 hours during the 12-month period immediately preceding the commencement of the leave. The 1,250 hours do not include time spent on paid or unpaid leave. Consequently, these hours of leave will not be counted in determining the 1,250 hours eligibility test for an employee under FMLA.
- 3) The employee must work in a worksite where 50 or more employees are employed by the company within 75 miles of that office or worksite. The distance is to be calculated by using available transportation by the most direct route.

C. Type of Leave Covered

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

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

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

Under the FMLA, a "spouse" means a husband or wife. Husband or wife refers to the other person with whom an individual entered into marriage as defined or recognized under state law for purposes of marriage in the state in which the marriage was entered into or, in the case of a marriage entered into outside of any

state if the marriage is valid in the place where entered into and could have been entered into in at least one state. This definition includes an individual in a same-sex or common law marriage that either:

- a) was entered into in a state that recognizes such marriages; or
- b) if entered outside of any state, is valid in the place where entered into and could have been entered into in at least one state.

A serious health condition is defined as a condition that requires inpatient care at a hospital, hospice, or residential medical care facility, including any period of incapacity or any subsequent treatment in connection with such inpatient care or a condition that requires continuing care by a licensed health care provider.

This policy covers illnesses of a serious and long-term nature, resulting in recurring or lengthy absences. Generally, a chronic or long-term health condition that would result in a period of three consecutive days of incapacity with the first visit to the health care provider within seven days of the onset of the incapacity and a second visit within 30 days of the incapacity would be considered a serious health condition. For chronic conditions requiring periodic health care visits for treatment, such visits must take place at least twice a year.

Employees with questions about what illnesses are covered under this FMLA policy or under the company's sick leave policy are encouraged to consult with the Human Resource Manager.

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

5) Qualifying exigencies leave for families of members of the National Guard or Reserve or of a regular component of the Armed Forces when the covered military member is on covered active duty or called to covered active duty.

An employee whose spouse, son, daughter, or parent either has been notified of an impending call or order to covered active military duty or who is already on covered active duty may take up to 12 weeks of leave for reasons related to or affected by the family member's call-up or service. The qualifying exigency must be one of the following:

- a. short-notice deployment
- b. military events and activities
- c. childcare and school activities

- d. financial and legal arrangements
- e. counseling
- f. rest and recuperation
- g. post-deployment activities
- h. additional activities that arise out of active duty, provided that the employer and employee agree, including the agreement on the timing and duration of the leave.

Eligible employees are entitled to FMLA leave to care for a current member of the Armed Forces, including a member of the National Guard or Reserve, or a member of the Armed Forces, the National Guard or Reserve who is on the temporary disability retired list, who has a serious injury or illness incurred in the line of duty on active duty for which he or she is undergoing medical treatment, recuperation, or therapy; or otherwise in outpatient status; or otherwise on the temporary disability retired list. Eligible employees may not take leave under this provision to care for former members of the Armed Forces, former members of the National Guard and Reserve, or members on the permanent disability retired list.

(6) To care for a covered service member with a serious injury or illness if the employee is the spouse, son, daughter, parent, or next of kin of the covered servicemember.

a) A “son or daughter of a covered servicemember” means the covered servicemember's biological, adopted, or foster child, stepchild or legal ward, or a child for whom the covered servicemember stood in loco parentis, and who is of any age.

b) A “parent of a covered servicemember” means a covered servicemember’s biological, adoptive, step or foster father or mother, or any other individual who stood in loco parentis to the covered servicemember. This term does not include parents-in-law.

c) The “next of kin of a covered servicemember” is the nearest blood relative, other than the covered servicemember’s spouse, parent, son, or daughter, in the following order of priority: blood relatives who have been granted legal custody of the servicemember by court decree or statutory provisions, brothers and sisters, grandparents, aunts and uncles, and first cousins, unless the covered servicemember has specifically designated in writing another blood relative as his or her nearest blood relative for purposes of military caregiver leave under the FMLA. When no such designation is made, and there are multiple family members with the same level of relationship to the covered servicemember, all such family members shall be considered the covered servicemember's next of kin and may take FMLA to leave to provide care to the covered servicemember, either consecutively or simultaneously. When such designation has been made, the designated individual shall be deemed to be the covered service member’s only next of kin. For example, if a covered service member has three siblings and has not

designated a blood relative to provide care, all three siblings would be considered the covered servicemember's next of kin. Alternatively, where a covered servicemember has siblings and designates a cousin as his or her next of kin for FMLA purposes, then only the designated cousin is eligible as the covered servicemember's next of kin. An employer is permitted to require an employee to provide confirmation of a covered family relationship to the covered service member pursuant to § 825.122(k).

"Covered active duty" means:

(a) "Covered active duty" for members of a regular component of the Armed Forces means duty during deployment of the member with the Armed Forces to a foreign country.

(b) Covered active duty or call to covered active-duty status in the case of a member of the Reserve components of the Armed Forces means duty during the deployment of the member with the Armed Forces to a foreign country under a federal call or order to active duty in support of a contingency operation, in accordance with 29 CR 825.102.

The leave may commence as soon as the individual receives the call-up notice. (Son or daughter for this type of FMLA leave is defined the same as for child for other types of FMLA leave except that the person does not have to be a minor.) This type of leave would be counted toward the employee's 12-week maximum of FMLA leave in a 12-month period.

(7) Military caregiver leave (also known as covered servicemember leave) to care for an injured or ill servicemember or veteran.

An employee whose son, daughter, parent, or next of kin is a covered servicemember may take up to 26 weeks of leave in a single 12-month period to care for that service member.

Next of kin is defined as the closest blood relative of the injured or recovering servicemember.

The term "covered servicemember" means:

(a) a member of the Armed Forces (including a member of the National Guard or Reserve) who is undergoing medical treatment, recuperation, or therapy; is otherwise in outpatient status; or is otherwise on the temporary disability retired list, for a serious injury or illness; or

(b) a veteran who is undergoing medical treatment, recuperation, or therapy for a serious injury or illness and who was a member of the Armed Forces (including a member of the National Guard or Reserve) at any time during the

period of 5 years preceding the date on which the veteran undergoes that medical treatment, recuperation or therapy.

The term “serious injury or illness” means:

(a) in the case of a member of the Armed Forces (including a member of the National Guard or Reserve), means an injury or illness that was incurred by the member in the line of duty on active duty in the Armed Forces (or existed before the beginning of the member’s active duty and was aggravated by service in the line of duty on active duty in the Armed Forces) and that may render the member medically unfit to perform the duties of the member’s office, grade, rank or rating;

(b) in the case of a veteran who was a member of the Armed Forces (including a member of the National Guard or Reserve) at any time during a period when the person was a covered servicemember, means a qualifying (as defined by the Secretary of Labor) injury or illness incurred by a covered servicemember in the line of duty on active duty that may render the servicemember medically unfit to perform the duties of his or her office, grade, rank or rating.

(c) Outpatient status, with respect to a covered servicemember, means the status of a member of the Armed Forces assigned to either a military medical treatment facility as an outpatient; or a unit established for the purpose of providing command and control of members of the Armed Forces receiving medical care as outpatients.

D. Amount of Leave

An eligible employee can take up to 12 weeks for the FMLA circumstances (No. 1) through (No. 5) above under this policy during any 12-month period. Circularix will measure the 12-month period as a rolling 12-month period measured backward from the date an employee uses any leave under this policy. Each time an employee takes leave, Circularix will compute the amount of leave the employee has taken under this policy in the last 12 months and subtract it from the 12 weeks of available leave, and the balance remaining is the amount the employee is entitled to take at that time.

An eligible employee can take up to 26 weeks for the FMLA circumstance (No. 6) above (military caregiver leave) during a single 12-month period. For this military caregiver leave, the company will measure the 12-month period as a rolling 12-month period measured forward. FMLA leave already taken for other FMLA circumstances will be deducted from the total of 26 weeks available.

If spouses both work for Circularix and each wishes to take leave for the birth of a child, adoption or placement of a child in foster care, or to care for a parent (but not a parent "in-law") with a serious health condition, the spouses may only take a combined total of 12 weeks of leave. If spouses both work for Circularix and each wishes to take leave to

care for a covered injured or ill service member, the spouses may only take a combined total of 26 weeks of leave.

E. Employee Status and Benefits During Leave

While an employee is on leave, Circularix will continue the employee's health benefits during the leave period at the same level and under the same conditions as if the employee had continued to work.

If the employee chooses not to return to work for reasons other than a continued serious health condition of the employee or the employee's family member or a circumstance beyond the employee's control, Circularix will require the employee to reimburse Circularix the amount it paid for the employee's health insurance premium during the leave period.

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

Circularix will provide 15 days' notification prior to the employee's loss of coverage.

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

F. Employee Status After Leave

An employee who takes leave under this policy may be asked to provide a fitness for duty (FFD) clearance from a health care provider. This requirement will be included in Circularix's response to the FMLA request. Generally, an employee who takes FMLA leave will be able to return to the same position or a position with equivalent status, pay, benefits, and other employment terms. The position will be the same or one that is virtually identical in terms of pay, benefits, and working conditions. Circularix may choose to exempt certain key employees from this requirement and not return them to the same or similar position when doing so will cause substantial and grievous economic injury to business operations. Key employees will be given written notice at the time FMLA leave is requested of (his/her) status as a key employee.

G. Use of Paid and Unpaid Leave

An employee who is taking FMLA leave because of the employee's own serious health condition or the serious health condition of a family member must use all paid vacation, personal or sick leave prior to being eligible for unpaid leave. Sick leave may be run concurrently with FMLA leave if the reason for the FMLA leave is covered by the established sick leave policy.

Disability leave for the birth of a child and for an employee's serious health condition, including workers' compensation leave (to the extent that it qualifies), will be designated as FMLA leave and will run concurrently with FMLA. For example, if Circularix provides six weeks of pregnancy disability leave, the six weeks will be designated as FMLA leave and counted toward the employee's 12-week entitlement. The employee may then be required to substitute accrued (or earned) paid leave as appropriate before being eligible for unpaid leave for what remains of the 12-week entitlement. An employee who is taking leave for the adoption or foster care of a child must use all paid vacation, personal or family leave prior to being eligible for unpaid leave.

An employee who is using military FMLA leave for a qualifying exigency must use all paid vacation and personal leave prior to being eligible for unpaid leave. An employee using FMLA military caregiver leave must also use all paid vacation, personal leave, or sick leave (as long as the reason for the absence is covered by the company's sick leave policy) prior to being eligible for unpaid leave.

H. Intermittent Leave or a Reduced Work Schedule

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

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

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

If an employee is taking leave for a serious health condition or because of the serious

health condition of a family member, the employee should try to reach agreement with Circularix before taking intermittent leave or working a reduced-hour schedule. If this is not possible, then the employee must prove that the use of the leave is medically necessary.

I. Certification for the Employee's Serious Health Condition

Circularix will require a medical certification supporting an employee's serious health condition. The employee must respond to such a request within 15 days of the request or provide a reasonable explanation for the delay. Failure to provide certification may result in a denial of leave. Medical certification will be provided using the DOL Certification of Health Care Provider for Employee's Serious Health Condition.

Circularix may directly contact the employee's health care provider for verification or clarification purposes using a health care professional, an HR professional, leave administrator or management official. Circularix will not use the employee's direct supervisor for this contact. Before the company makes this direct contact with the health care provider, the employee will be given an opportunity to resolve any deficiencies in the medical certification. In compliance with HIPAA Medical Privacy Rules, Circularix will obtain the employee's permission for clarification of individually identifiable health information.

Circularix has the right to ask for a second opinion if it has reason to doubt the certification. Circularix will pay for the employee to get a certification from a second doctor, which Circularix will select. Circularix may deny FMLA leave to an employee who refuses to release relevant medical records to the health care provider designated to provide a second or third opinion. If necessary, to resolve a conflict between the original certification and the second opinion, the company will require the opinion of a third doctor. Circularix and the employee will mutually select the third doctor, and Circularix will pay for the opinion. This third opinion will be considered final. The employee will be provisionally entitled to leave and benefits under the FMLA pending the second and/or third opinion.

J. Certification for the Family Member's Serious Health Condition

Circularix will require a medical certification for a family member's serious health condition. The employee must respond to such a request within 15 days of the request or provide a reasonable explanation for the delay. Failure to provide certification may result in a denial of leave. Medical certification will be provided using the DOL Certification of Health Care Provider for Family Member's Serious Health Condition.

Circularix may directly contact the employee's family member's health care provider for verification or clarification purposes using a health care professional, an HR professional, leave administrator or management official. Circularix will not use the employee's direct supervisor for this contact. Before Circularix makes this direct contact with the health care provider, the employee will be given an opportunity to resolve any deficiencies in the medical certification. In compliance with HIPAA Medical Privacy

Rules, Circularix will obtain the employee's family member's permission for clarification of individually identifiable health information.

Circularix has the right to ask for a second opinion if it has reason to doubt the certification. Circularix will pay for the employee's family member to get a certification from a second doctor, which the company will select. Circularix may deny FMLA leave to an employee whose family member refuses to release relevant medical records to the health care provider designated to provide a second or third opinion. If necessary, to resolve a conflict between the original certification and the second opinion, Circularix will require the opinion of a third doctor. Circularix and the employee will mutually select the third doctor, and the company will pay for the opinion. This third opinion will be considered final. The employee will be provisionally entitled to leave and benefits under the FMLA pending the second and/or third opinion.

K. Certification of Qualifying Exigency for Military Family Leave

Circularix will require certification of the qualifying exigency for military family leave. The employee must respond to such a request within 15 days of the request or provide a reasonable explanation for the delay. Failure to provide certification may result in a denial of leave. This certification will be provided using the DOL Certification of Qualifying Exigency for Military Family Leave.

L. Certification for Serious Injury or Illness of Covered Servicemember for Military Family Leave

Circularix will require certification for the serious injury or illness of the covered servicemember. The employee must respond to such a request within 15 days of the request or provide a reasonable explanation for the delay. Failure to provide certification may result in a denial of leave. This certification will be provided using the DOL Certification for Serious Injury or Illness of Covered Servicemember.

M. Recertification

Circularix may request recertification for the serious health condition of the employee or the employee's family member no more frequently than every 30 days unless circumstances have changed significantly, or if Circularix receives information casting doubt on the reason given for the absence, or if the employee seeks an extension of his or her leave. Otherwise, Circularix may request recertification for the serious health condition of the employee or the employee's family member every six months in connection with an FMLA absence. Circularix may provide the employee's health care provider with the employee's attendance records and ask whether need for leave is consistent with the employee's serious health condition.

N. Procedure for Requesting FMLA Leave

All employees requesting FMLA leave must provide verbal or written notice of the need for the leave to the HR manager. Within five business days after the employee has provided this notice, the HR manager will complete and provide the employee with the DOL Notice of Eligibility and Rights.

When the need for the leave is foreseeable, the employee must provide at least 30 days' notice. When an employee becomes aware of a need for FMLA leave less than 30 days in advance, the employee must provide notice of the need for the leave either the same day the need for leave is discovered or the next business day. When the need for FMLA leave is not foreseeable, the employee must comply with the Company's usual and customary notice and procedural requirements for requesting leave, absent unusual circumstances.

O. Designation of FMLA Leave

Within five business days after the employee has submitted the appropriate certification form, the HR manager will complete and provide the employee with a written response to the employee's request for FMLA leave using the DOL Designation Notice.

P. Intent to Return to Work from FMLA Leave

On a basis that does not discriminate against employees on FMLA leave, Circularix may require an employee on FMLA leave to report periodically on the employee's status and intent to return to work.

3. Pregnancy and Childcare Leave

In addition to the FMLA, under applicable state law, eligible employees may take a leave of absence regarding pregnancy and childrearing or child care (as contained in relevant state statutes and regulations).

For additional information, please contact HR.

4. Workers' Compensation Disability Leave

a. Employee Eligibility

The Company will grant you a workers' compensation disability leave in accordance with state law if you incur an occupational illness or injury. As an alternative, the Company may offer you modified work.

b. Notice & Certification Requirements

You must report all accidents, injuries and illnesses, no matter how minor, to Management. You must also provide the Company with a health care provider's statement certifying your work-related illness or injury, your inability to work, and the expected duration of your leave.

c. Compensation during Leave

Workers' compensation disability leaves are without pay, to the maximum extent permitted by state law. However, you may utilize accrued vacation or unpaid sick leave during the leave. At no time will you receive a greater total payment than your regular compensation.

d. Length of Leave

An industrial medical leave of absence shall be for a reasonable period during which an Employee is disabled, but the leave of absence shall not extend beyond the time that the Employee is deemed "permanent and stationary."

e. Reinstatement

Upon the submission of a medical certification that you can return to work, you will be reinstated in accordance with applicable law. If you are disabled due to an industrial injury, the Company will attempt to accommodate you.

F. OTHER TIME OFF

1. Funeral or Bereavement Leave

Full-time Employees who have been continuously employed by the Company for at least ninety (90) days are eligible for up to two (2) consecutive days (up to 8 hours straight time pay per day, based on your normal shift schedule) of excused absence with pay for the death of an immediate family member and 1 day (up to 8 hours straight time pay, based on your normal shift schedule) for other relatives. In order to be eligible for such pay, the hours missed must be a scheduled workday(s). Request for pay for funeral leave must be submitted on an absence request form for approval by the Employee's Supervisor and Human Resources. Proof of death may be required to receive pay.

For purposes of this policy, immediate family member means: spouse/domestic partner, parents, child, sibling, grandparent, grandchild, parent-in-law, sister-in-law, brother-in-law, and corresponding step-relatives.

For purposes of this policy, other relatives mean aunt, uncle, cousin, spouse/domestic partner's relatives.

The two (2) days of paid leave must consist of the day of the funeral and the day before or after. For one (1) paid leave the day off must be the day of the funeral.

The time for excused funeral leave absence cannot be retroactive, postponed, nor split. Additional time off requested by the Employee will be non-paid and subject to Circularix's attendance policies.

Employees who are not entitled to leave under this policy may request unpaid time off which will be granted at the sole discretion of the Company.

2. Civic Duty Time Off

Employees are encouraged to fulfill their civil responsibilities, including participation in jury duty. Time off for jury duty is granted to Employees upon presentation of the summons by the Employee to their Supervisor as soon as it is received.

Employees serving jury duty on their scheduled workdays will be compensated up to 8 hours at their regular straight rate (if it is not a scheduled workday the Employee will not be compensated), to the maximum extent permitted by state law. The company will pay a maximum of three (3) workdays (24 hours) in a calendar year for jury duty. If jury duty lasts more than three days for non-exempt Employees, additional time off that is required will be unpaid. Exempt Employees will not incur any reduction in pay for a partial week of absence due to jury or witness duty.

Verification from the Court clerk of having served may be required and an Employee who is excused from Court for the entire day must report to work. Also, if you are excused or dismissed by the Court on any day after less than four (4) hours, you will be expected to report or return to work for the remainder of your work schedule.

The Company does not pay Employees while they serve on witness duty.

3. Voting Time Off

If you cannot vote in a statewide public election before or after working hours, then you will be allowed enough time off to go to the polls. The Company will pay you for up to the first two (2) hours of absence from regularly scheduled work that is necessary to vote in a statewide public election. Any additional time off will be without pay, to the maximum extent permitted by state law. You must give reasonable notice to Management of the need to have time off to vote and must give at least three (3) days' notice when three (3) days' notice is possible.

4. Crime Victim Leave

Eligible employees may take time off from work to comply with a subpoena or other court order to serve as a witness in a criminal proceeding or to attend a criminal proceeding.

Employees are eligible for time off under this policy if they are: (1) the victim of the crime at issue in the proceeding; (2) related to the victim within three degrees of the employee (i.e., parents, grandparents and great-grandparents; brothers and sisters, nephews and nieces; uncles and aunts; children, grandchildren and great-grandchildren); (3) are in a common-law relationship with the victim; or (4) living in the same household with the victim.

An employee who is the perpetrator of the crime is not eligible for time off.

Time off under this policy will be unpaid, except that an exempt employee will not receive a reduction in salary for a partial workweek absence due to attendance as a witness.

5. Military Leave

Circularix complies with the Uniformed Services Employment and Re-employment Rights Act (“USERRA”) and all applicable state statutes providing for military leave. USERRA provides certain rights to employees for military service in the uniformed, commissioned or other covered services. Military service includes voluntary/involuntary active duty and duty for training. Full-time National Guard duty and absence from work for an examination to determine a person’s fitness for service is also included. In compliance with USERRA, uniformed service includes service in the Army, Navy, Marines, Air Force, Coast Guard, Army National Guard, Air National Guard, and “commissioned service” in the United States Public Health Service. USERRA also applies to certain types of service under the National Disaster Medical Service.

Circularix will comply with any state law that provides greater military leave rights than the rights provided under the federal Uniformed Services Employment and Re-employment Rights Act, such as the Pennsylvania Military Leave of Absence Act. For specific information regarding your rights under USERRA and to obtain the required forms, contact the Company’s CEO as soon as you know that you may need to request a military leave of absence.

6. Organ and Bone Marrow Donor Leave

This is an additional leave entitlement for Pennsylvania employees providing that eligible employees may take time off to donate bone marrow or an organ for human transplant. Employees may take up to five days of unpaid leave for the donation and recovery from the donation. Employees who wish to request time off under this policy should contact Human Resources.

7. Emergency Responder Leave

Employees who are active volunteer firefighters, fire police or members of a volunteer ambulance service or rescue squad will be provided with unpaid time off from work or excused for being late to work when late or absent for the purpose of responding to a fire or ambulance call prior to regular hours of employment.

8. Physical Examinations Following a Leave

An Employee who wishes to return to work following a leave of absence resulting from an injury or illness may be required to take a physical examination to: (1) determine if the Employee is an “individual with a disability” for purposes of the Americans With Disabilities Act and any other applicable federal or state law; (2) to determine if the Employee can perform the essential functions of the job to which he or she is returning

with or without reasonable accommodation and without posing a direct threat to the health or safety of his or herself or others, and (3) to identify an effective accommodation that would enable the Employee to perform the essential functions of the job. The Company shall select the physician and pay for such physical examination.

G. POST-TERMINATION CONTINUATION OF MEDICAL INSURANCE

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

VIII. TERMINATION

A. VOLUNTARY TERMINATIONS

If you decide to leave your employment with the Company, we ask that you give us at least two (2) weeks written notice. This will give us the opportunity to make the necessary adjustments in our operation.

B. INVOLUNTARY TERMINATIONS

While the decision to commence employment is consensual, the same is not always true when the time comes to terminate the employment relationship. As an at-will employer, the Company reserves the right to end the employment relationship at any time, with or without cause or notice. In the event your employment is terminated, you must return all property owned by the Company to Management prior to your departure.

C. REDUCTIONS IN FORCE

While Circularix hopes to continue growing and providing employment opportunities, changes in business conditions, consumer demand and other factors can create a need to restructure or reduce the number of Employees.

If it becomes necessary to restructure our operations or reduce the number of Employees, Circularix will attempt to provide advance notice, if possible, and as required by law. In determining which Employees will be subject to layoff, Circularix will consider, among other things, appropriate factors such as operational requirements, the skill, productivity, ability and past performance of those involved, and, where feasible, length of service of those involved. However, all criteria and final decisions are within the sole discretion of Circularix.

D. EXIT INTERVIEWS

Before leaving, you may be asked to participate in a voluntary exit interview. This will provide closure to your employment with the Company and will allow the Company

to ensure that it has resolved various administrative matters, answered any questions about continuation of benefits and listened to any of your comments or ideas about improving the Company's operations.

E. REHIRE

Should employees leave the Company's employment and then be rehired, previously accrued seniority will be forfeited, and seniority will begin to accrue again on the date of rehire unless employee was rehired before 6 months of last day worked.

F. RETURN OF COMPANY PROPERTY

At the end of your employment, all Company property must be immediately returned to the Company, including but not limited to: (a) keys; (b) uniforms; (c) access cards; (c) safety equipment (PPE); (d) office equipment; (e) tools; (f) phones / PDAs; (g) Confidential Information; and (h) all work in progress and documents and any other property belonging to the Company.

G. REFERENCES

All reference requests should be directed to Human Resources. No other Employee is authorized to release references for a current or former Employee. Generally, the Company discloses only the dates of employment and the title of the last position held of former Employees. If you authorize the disclosure in writing, the Company also will inform prospective employers of the amount of salary or wage you last earned.

IX. CONCLUSION

Many of the Company's policies and Employee benefits have been treated only briefly in this Employee Handbook. If you have any questions or want more information, Management will be glad to fill in the details for you.

ACKNOWLEDGMENT

This is to acknowledge that I have received a copy of the Employee Handbook (including applicable addendums) for Circularix LLC ("Circularix" or "CX Entity") and understand that it sets forth the terms and conditions of my employment as well as the duties, responsibilities, and obligations of employment with the Company. I understand that it is my responsibility to read the Employee Handbook and to abide by the rules, policies, and standards set forth in the Employee Handbook.

I also acknowledge that my employment with the Company is at will, meaning that it is not for a specified period of time and can be terminated at any time for any reason, with or without cause or notice, by me or by the Company. I acknowledge that no oral or written statements or representations regarding my employment can alter the foregoing. I also acknowledge that nothing about this Employee Handbook alters my employment at-will.

I also acknowledge that, except for the policy of at-will employment, the Company reserves the right to revise, delete and add to the provisions of this Employee Handbook. All such revisions, deletions, or additions must be in writing and must be signed by the Circularix CEO or President. No oral statements or representations can change the provisions of this Employee Handbook.

I also acknowledge that, except for the policy of at-will employment, terms and conditions of employment with the Company may be modified at the sole discretion of the Company, with or without cause or notice, at any time. No implied contract concerning any employment-related decision, term of employment, or condition of employment can be established by any other statement, conduct, policy, or practice.

Nothing in the Circularix employment at-will policy is intended to interfere with Employee rights under the National Labor Relations Act and/or other applicable laws.

Date: _____

Employee Signature_____

Employee Name [printed]_____

Human Resources Signatures_____

TO BE PLACED IN EMPLOYEE'S PERSONNEL FILE