

Sick and Safe Leave Policy: Home Care Workers

Effective January 1, 2025

Commencing as of the first day of an employee's employment, all Royal Care employees will accrue .033 hours of paid sick and safe leave ("PSSL") for every hour worked, subject to a maximum of Fifty Six (56) PSSL hours per calendar year. PSSL hours may be used for the following reasons:

- To care for an employee's own mental or physical illness, injury, or health condition;
- To obtain a medical diagnosis for the employee's own mental or physical illness, injury, or health condition;
- To receive preventive medical care;
- To care for a family member (i.e., child, spouse, domestic partner, parent, child or parent of a spouse of domestic partner, grandchild, grandparent, or sibling) who needs a medical diagnosis, care, or treatment of a mental or physical illness, injury, or health condition;
- To care for a family member who needs preventive medical care;
- To care for a child whose school or child care provider is temporarily closed due to a public health emergency;
- When an employee or an employee's family member has been the victim of a family offense matter, sexual offense, stalking, or human trafficking, and the employee must take action in order to maintain, improve, or restore the physical, psychological, or economic health or safety of the employee or the employee's family member or to protect those who associate or work with the employee. Such actions may include:
 - Obtaining services from a domestic violence shelter, rape crises center, or other shelter or services program for relief from a family offense matter, sexual offense, stalking or human trafficking;
 - Participating in safety planning, temporarily or permanently relocating or taking other actions to increase the safety of the employee or the employee's family members from future harm;
 - Meeting with an attorney or other social service provider to obtain information and advice on, and preparing for or participating in, any criminal or civil proceeding, including but not limited to, matters related to a family offense matter, sexual offense, stalking, human trafficking, custody, visitation, matrimonial issues, orders of protection, immigration, housing, and/or discrimination in employment, housing or consumer credit; and/or
 - Filing a complaint or domestic incident report with law enforcement or meeting with a district attorney's office.
- To enroll a child in a new school;
- When Royal Care is closed by order of a public official due to a public health emergency; or
- Any other reason mandated by applicable law.

Employees who (i) misrepresent their need for, or the reason why they are taking, PSSL; (ii) otherwise abuse the provisions of any applicable PSSL law, (iii) fail to provide to the appropriate Coordinator with the required advance notice of the need to use PSSL (as described below); and/or (iv) fail to submit requested documentation (as described below), may be subject to disciplinary action, up to and including termination of employment. To be clear, PSSL may only be used for the reasons described above; it may not be used as additional vacation time or for any other unauthorized purpose.

When an employee uses accrued PSSL, such leave time will be compensated at the rate at which the employee would have been paid had the employee not taken PSSL. Accordingly, employees using accrued PSSL will be paid an amount that is equal to the amount they would have earned had they instead worked during the period of PSSL. Specifically, employees who had been scheduled to work a non-live-in or non-sleep-in shift will generally be paid for the number of hours for which they had been scheduled to work had they not taken PSSL. Employees who use PSSL on a day on which they were scheduled to work either a live-in or a sleep-in shift will typically be paid a maximum of thirteen (13) hours.

PSSL must be used in minimum initial increments of either four (4) hours per day or the duration of the shift during which the employee seeks to use PSSL, whichever is less. PSSL beyond the initial four-hour minimum daily increment (as applicable) must be used in increments of thirty (30) minutes throughout the remainder of the day. Employees will typically be paid for used sick and safe leave no later than the payday for the first full payroll period immediately following the use of such sick or safe leave.

Accrued PSSL that has not been used by the end of the calendar year will be carried over into the subsequent calendar year. However, under no circumstance will an employee be permitted to use more than 56 PSSL hours in a given calendar year. Under no circumstance will employees be compensated for accrued but unused PSSL, either at the end of the calendar year, the end of employment, or at any other time.

Employees must provide their assigned Coordinator with reasonable notice of the need to use PSSL, unless such notice is impossible, such as, for instance, in the event of a sudden injury or illness. The foregoing notice may be provided either

verbally or in writing, by calling, sending an email to, or providing in-person notice to, the appropriate Coordinator. If an employee attempts, but is unable, to reach his or her Coordinator by telephone, the employee must leave a voicemail. In the event of an unforeseeable need to use PSSSL, the employee must keep his or her Coordinator informed as to the expected duration of the absence. An employee's use of PSSSL shall not be conditioned upon searching for or finding a replacement worker.

In the event that an employee uses PSSSL for more than three (3) consecutive work days, Royal Care may require the employee to provide documentation regarding the need for such PSSSL. Documentation in connection with the use of paid sick leave need only be provided by one (1) licensed health care provider, need not disclose the nature of the at-issue illness, injury, or health condition, and may be submitted up to seven (7) days following an employee's return to work following a period of paid sick or safe leave. Documentation in connection with the use of paid safe leave need not disclose the details of the family offense matter, sexual offense, stalking, domestic violence, or human trafficking, and shall be accepted in any of the following forms:

- Documentation signed by:
 - an employee, agent, or volunteer of a victim services organization;
 - an attorney;
 - a member of the clergy; or
 - a medical or other professional service provider from whom the employee or the employee's family member has sought assistance in addressing family offense matters, sex offenses, stalking, domestic violence, or human trafficking and their effects;
- A police or court record; or
- A notarized letter from the employee explaining the need for such time.

Health information about an employee or an employee's family member, and information concerning an employee's or an employee's family member's status or perceived status as a victim of family offenses, sexual offenses, stalking, domestic violence, or human trafficking, which information was obtained solely for the purposes of utilizing PSSSL, shall be treated as confidential and shall not be disclosed except by the affected employee, with the written permission of the affected employee, or as required by law.

In the event that Royal Care requests documentation as described in this policy, it will reimburse the employee for any cost charged by a health care provider or other entity for providing a doctor's note or other documentation to support the need for PSSSL. Failure to provide, or a delay in providing, the required documentation may result in a denial of the request for PSSSL or a delay in the approval of the request.

Once an employee has used 56 hours of PSSSL in the course of a calendar year, Royal Care may require the employee to provide medical or other relevant documentation in connection with *all* subsequent requests for PSSSL during the same year. Subject to applicable law, requests to take *unpaid* sick and safe leave will be subject to Royal Care's sole discretion and approval.

Using PSSSL will not count as hours worked for the purpose of determining whether an employee has met or exceeded any applicable overtime thresholds.

Royal Care shall not take any adverse action against an employee who lawfully exercises his or her right to use PSSSL. Any employee who believes that his or her rights under such law may have been violated may direct such complaints to the New York City Department of Consumer Affairs or the New York State Department of Labor.

Questions

Questions about this policy or other matters pertaining to PSSSL, including questions in an employee's language of origin, may be directed to Royal Care's Chief Compliance Officer, who will either respond to such questions or facilitate a response from the Company. The Chief Compliance Officer may be reached, as follows:

Joel Bernath, 6323 14th Avenue Brooklyn, New York 11219, 718.851.3800, joel@royalcare.nyc

Request for Return of Acknowledgement Receipt

Royal Care requests that all employees confirm by way of a signed, dated "Acknowledgement of Receipt" form (which will be provided to each employee) that they have received this policy. Such executed Acknowledgement Receipt should be submitted to the Company's Chief Compliance Officer or to the Company's Human Resources personnel.

Vacation Policy: Home Care Workers

All Royal Care home care workers will accrue .018 hours of paid vacation time for every hour worked, subject to a maximum total accrual of 24 hours of paid vacation per calendar year. Paid vacation time may be taken, for example, to allow eligible employees to rest, relax, and pursue special interests, or for religious holidays of significance to the employee.

Requests to use paid vacation time must be submitted to an employee's assigned Coordinator **in writing** at least 2 weeks prior to the first intended vacation day. Requested vacation may not be taken unless and until the employee's Coordinator has approved the request in writing. The decision of whether to grant a vacation request will be based on a range of factors including, but not limited to, business needs and volume, required staffing levels, and, as applicable, the needs of the individual(s) to whom an employee is providing care services. This is especially so during popular vacation times, such as President's Week, Spring Break, and December Break. Once approved, paid vacation time must be used in minimum increments of at least 4 hours.

If an employee's Coordinator determines that, due to business needs, required staffing levels, and/or the needs of the individual(s) to whom an employee is providing care services, a request to use paid vacation time must be denied, Royal Care may, in its sole discretion, offer to pay the employee an amount equal to the straight-time value of some or all the paid vacation time hours s/he had requested to take. In the event that Royal Care makes such a payment, the employee's total paid vacation time accrual will be reduced by the number of hours for which the employee was paid. To be clear, the determination as to whether any such payment is to be either offered or made resides, in all instances, within the sole discretion of Royal Care.

Accrued paid vacation time that has not been used by the end of the calendar year will be carried over into the subsequent calendar year, subject to a maximum carryover of 24 paid vacation time hours. Under no circumstance will employees be compensated for accrued but unused paid vacation time, either at the end of the calendar year, the end of employment, or any other time.

Employees may be required to use accrued vacation time in instances when they arrive late for a scheduled work shift or assignment. This does not, however, excuse the employee's tardiness. Vacation time will not be counted as hours worked for purposes of determining whether an employee has met or exceeded any applicable overtime thresholds.

NEWBORNS' AND MOTHERS' HEALTH PROTECTION ACT NOTICE

Group health plans and health insurance issuers generally may not, under Federal law, restrict benefits for any hospital length of stay in connection with childbirth for the mother or newborn child to less than 48 hours following a vaginal delivery, or less than 96 hours following a cesarean section. However, Federal law generally does not prohibit the mother's or newborn's attending provider, after consulting with the mother, from discharging the mother or her newborn earlier than 48 hours (or 96 hours for a cesarean). In any case, plans and issuers may not, under Federal law, require that a provider obtain authorization from the plan or the insurance issuer for prescribing a length of stay not in excess of 48 hours (or 96 hours for a cesarean).

WOMEN'S HEALTH AND CANCER RIGHTS ACT NOTICE

If you are covered by a Royal Care health plan and you have had or are going to have a mastectomy, you may be entitled to certain benefits under the Women's Health and Cancer Rights Act of 1998 (WHCRA). For individuals receiving mastectomy-related benefits, coverage will be provided in a manner determined in consultation with the attending physician and the patient, for:

- All stages of reconstruction of the breast on which the mastectomy was performed;
- Surgery and reconstruction of the other breast to produce a symmetrical appearance;
- Prostheses; and
- treatment of physical complications of the mastectomy, including lymphedema.

These benefits will be provided subject to the same deductibles and coinsurance applicable to other medical and surgical benefits provided under the Royal Care plan in which you are enrolled. If you would like more information on WHCRA benefits, call 718-851-3800.

UNPAID SICK / SAFE LEAVE POLICY

With respect to New York City Earned Safe and Sick Time Act, the firm has policies and procedures included in the employee handbook. We note that there are amendments to this law which come into effect on February 22, 2026. These amendments include additional bases for an employee to use leave and a new bank of 32 hours of front-loaded annual unpaid sick time. We will publish an updated policy once New York City provides an updated notice to be used for this purpose.



THE ROYAL CARE, INC.

PAID FAMILY LEAVE AND PAID PRENATAL LEAVE POLICY

All eligible The Royal Care, Inc. (“Royal Care”) employees are entitled to Paid Family Leave (“PFL”) as part of Royal Care’s disability insurance program, in accordance with New York State’s Paid Family Leave Benefits Law (the “Law”). This policy also provides information related to paid prenatal leave.

Employee Eligibility:

Full-time Employees: For purposes of this Paid Family Leave Policy only, full-time employees are defined as employees regularly scheduled to work twenty (20) hours or more in a workweek. In order to be eligible for PFL, full-time employees must have worked for Royal Care for a minimum of 26 consecutive weeks prior to the first day on which PFL is taken.

Part-time Employees: For purposes of this Paid Family Leave Policy only, part-time employees are defined as employees who are regularly scheduled to work less than twenty (20) hours in a workweek. In order to be eligible for PFL, part-time employees must have worked for Royal Care for a minimum of 175 days prior to the first day on which PFL is taken.

Certain employees are not eligible for PFL, including: (i) employees receiving disability benefits under New York’s Disability Benefits Law, (ii) employees on administrative leave, (iii) employees receiving unemployment insurance benefits, and (iv) employees not entitled to leave under Section 205 of the Law.

Immigration status does not affect an employee’s eligibility for PFL.

Reasons for Leave: Eligible employees may take PFL for the following reasons:

- (1) To bond with a child during the first twelve (12) months after the child’s birth, or the first twelve (12) months after the placement of a child for adoption or foster care with the employee. For purposes of this Paid Family Leave Policy only, “child” is defined as a biological child, adopted child, stepchild, foster child, legal ward, son or daughter of a domestic partner, or a person to whom the employee stands in loco parentis; or
- (2) To provide physical or psychological care for a family member with a serious health condition (as defined in the Law). For purposes of this Paid Family Leave Policy only, “family member” includes child, parent, grandparent, grandchild, spouse, or domestic partner (as defined in the Law); or
- (3) For a qualifying exigency arising out of the active duty of the employee’s spouse, domestic partner, child, or parent (as defined in the Law).
- (4) Generally, an eligible employee may not use PFL for his or her own serious health condition, including pre-natal needs or conditions that eligible employees can also use paid prenatal leave during times that an employee cannot work because the employee is receiving health care services during their pregnancy or related to such pregnancy, including physical examinations, medical procedures, monitoring and testing, and discussions with a health care provider related to the pregnancy. Eligible employees are entitled to up to 20 hours of paid prenatal leave. Please contact human resources for further information related to paid prenatal leave.

Leave Time and Benefit Payments:

Employees are eligible for up to a maximum of 12 weeks of PFL in a consecutive 52-week period. Employees are limited to the maximum amount of PFL in a consecutive 52-week period, even if they begin employment with a different covered employer during that 52-week period. The PFL benefit amount is 67% of an employee’s average weekly wage or the State’s average weekly rate, whichever is lower.

The employee’s average weekly wage is calculated by way of a 52-week “lookback” period.

Employees may not take more than a combined total of 26 weeks of disability leave and PFL in any 52-week period.

Employee Contribution: PFL benefits are funded by employee contributions made through payroll deductions. The amount of an employee’s contribution depends on the employee’s average weekly wage. The maximum deduction

amount will be adjusted periodically by the State of New York. The amount of any deduction taken will be reflected on an employee's paystub.

Employees who do not meet, or are not reasonably anticipated to meet, the PFL eligibility criteria may sign a waiver form enabling them to opt out of the above-noted employee contributions. Such waiver forms can be obtained from the Human Resources Department. Employees who do not sign the waiver form will be subject to the same payroll deductions as eligible employees.

Requests for PFL:

Leave Time: If the need for PFL is foreseeable, employees must provide a written request for PFL to the Human Resources Department at least thirty (30) days in advance. If the need for PFL is unforeseeable, employees must provide a written request for PFL to the Human Resources Department as soon as practicable. In either case, failure to provide timely notice may result in a delay in the approval of, or a denial of, the employee's request. This written notice must include sufficient details including: (i) the reason for the PFL, and (ii) the anticipated timing and duration of the leave.

Employees may take PFL on an intermittent basis, but must use PFL in full-day increments. Employees must request to use intermittent leave as soon as practicable before the day of leave.

Benefit Payments: Employees must provide completed claim forms to the insurance carrier. The carrier is then responsible for approving or denying benefit payments. These forms can be found on the New York State Department of Labor's website and can also be obtained from Royal Care's Human Resources Department. Employees must first complete their portion of the form, and must then provide the form to the Human Resources Department for the completion of the employer's section of the form. Employees must submit the claim form to the insurance carrier for processing within thirty (30) days of the first day of their PFL. Please note that it may take some time for the insurance carrier to issue a determination on a request for payment. Employees will receive benefit payments (if at all) from the insurance carrier.

Certification: Employees must provide to the insurance carrier the required medical certification or proof of claim documentation along with their request for the paid benefit. Failure to do so may result in a delay in the approval of, or a denial of, the employee's request. The forms for this certification may be found on the New York State Department of Labor's website and in the Human Resources Department.

Interaction with Other Available Leave Benefits:

If an employee is eligible for leave under the Family and Medical Leave Act ("FMLA"), and if the reason for PFL is also a qualifying basis for FMLA leave, then PFL taken in accordance with this policy will run concurrently with an employee's available leave entitlement under the FMLA. Please consult Royal Care's FMLA policy for additional details.

In addition to FMLA benefits, employees may have available paid time off (i.e., sick leave, vacation leave, etc.). Employees may, but are not required to, choose to supplement PFL benefit payments with any available paid time off in order to receive 100% of their salary during PFL.

Maintenance of Benefits and Reinstatement Rights:

While on PFL, employees will continue to receive health insurance benefits under the same terms and conditions that existed prior to the leave. Employees must continue to pay their portion of the insurance premium during the PFL.

Upon return from PFL, employees will be restored to the position of employment held by the employee when the leave commenced, or to a comparable position with comparable employment benefits, pay, and other terms and conditions of employment.

PTO will not continue to accrue during PFL.

Resignation/Termination: Employees are not entitled to payment for accrued but unused PFL upon resignation or termination, or under any other condition.

Questions about this policy should be directed to Sarah Geller at ext. 211.