



YOUR EMPLOYMENT GWC AND YOU

Welcome to GWC & Construction, Inc. (GWC). You are a valuable addition to our Company and we look forward to a productive and successful association. This ORIENTATION serves as the guide for the employer/employee relationship. Unless context clearly indicates otherwise, the term “Company” used throughout this handbook is defined as GWC.

This handbook is an overview of GWC’s policies, procedures, and general information. It is not a contract. It does not address all possible applications of or exceptions to the general policies and procedures described. **For that reason, if you have any questions about any of our policies or practices, you should ask your supervisor or the Human Resource Department at (956) 607-5099.** Because you are at all times an at-will employee of the Company and this handbook is not a contract between us, GWC reserves the right to modify, revoke, suspend, terminate, or change any or all of its policies or procedures in whole or in part at any time, with or without notice. We will do our best to inform you of any changes as they occur. Finally, some of the subjects described here may be covered in detail in the specific policy documents. You should refer to these documents for specific information, since this handbook only briefly summarizes those benefits has been, and will continue to be, a fundamental principle at our Company, where employment is based on equal opportunity for all without discrimination on the basis of race, color, religion, sex (including pregnancy), age, national origin, disability, veteran status, sexual orientation, genetic information, or any other characteristic prohibited by law. This policy applies to recruitment and hiring, compensation, benefits, promotion, termination and all other terms and conditions of employment. For more information on this topic, please see the Appendix A at the end of the handbook for relevant materials and/or consult the postings found at your workplace(s).

FITNESS FOR DUTY & DISABILITY ACCOMMODATION

The Company reserves the right to require you or an applicant to whom a job offer has been made to submit to a physical examination for *bona fide* work-related reasons consistent with business needs. Any such examination will be at the Company's expense. If you refuse to submit to an examination, or refuse to authorize the release of examination results to the Company, you are subject to immediate termination, or in the case of an applicant, the offer will be rescinded. This fitness-for-duty requirement, however, will be administered in accordance with the Americans with Disabilities Act. No qualified employee or applicant will be discriminated against with respect to any terms or conditions of employment because of such person’s disability or perceived disability so long as the employee or applicant can perform the essential functions of the job with or without reasonable accommodation. Employees with a disability who believe they need a reasonable accommodation to perform the essential functions of their job should contact the Human Resources Department. GWC encourages individuals with disabilities to come forward and request reasonable accommodation. For more information on this topic, please see the Appendix at the end of the handbook for relevant materials and/or consult the postings found at your workplace(s).

HARASSMENT PROHIBITED



Harassment of anyone is prohibited. Under this policy, harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual or group of individuals, including on any of the protected bases listed in the Equal Employment Opportunity Commitment above. Harassment has the purpose or effect of:

(i) creating an intimidating, hostile or offensive work environment; unreasonably interfering with an individual's work performance; or (iii) adversely impacting an individual's employment opportunities. Harassing conduct includes, but is not limited to: epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes and display or circulation in the workplace of written or graphic material that denigrates or shows hostility or aversion toward an individual or group (including through texts or e-mail even where the content is only being forwarded by the sender). Sexual harassment is a form of prohibited harassment. Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example: (i) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (ii) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (iii) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment. Sexual harassment may include a range of subtle and not so subtle behaviors and may involve individuals of the same or different gender. These behaviors include, but are not limited to: verbal conduct such as epithets, derogatory jokes or comments, slurs or unwanted sexual advances, invitations or comments; visual conduct such as derogatory and/or sexually oriented posters, photography, cartoons, drawings or gestures; physical conduct such as assault, unwanted touching, blocking normal movement or interfering with work because of sex, race or any other protected basis; threats and demands to submit to sexual requests as a condition of continued employment, or to avoid some other loss, and offers of employment benefits in return for sexual favors; and retaliation for having reported or threatened to report harassment.

DISCRIMINATION/HARASSMENT COMPLAINT PROCEDURE

The Company needs, expects and encourages you to come forward, without delay, should you suspect that any form of harassment or discrimination has occurred. The Company takes all complaints seriously. If you believe that you have been the victim of discrimination, harassment (including sexual harassment) and/or denied accommodation (e.g., for your disability, pregnancy, childbirth, or related medical condition, or for your religious belief and/or religious practice), you should report this problem to your immediate supervisor or any other member of management and/or **GWC HR**

Resources at (956) 607-5099. In a case where your complaint may involve your immediate supervisor, you should notify any other member of management and/or Human Resources.

Your complaint should be as detailed as possible. You will be asked to provide the details of the incidents) that occurred and the names of all individuals involved and any witnesses. It would be best to communicate your complaint in writing, but this is not mandatory. Supervisors and managers should refer all complaints involving discrimination, harassment or other prohibited conduct to Human Resources.

Upon receipt of a complaint, Human Resources will immediately undertake an effective, thorough and objective investigation of the allegations. All complaints will be investigated. **Early reporting and intervention have proven to be the most effective method of resolving actual or perceived**



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

RETALIATION & FALSE STATEMENTS PROHIBITED

The Company prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports. Retaliation is a serious policy violation and will be result in discipline up to and including termination. Likewise, the Company prohibits anyone involved in such an investigation from making false statements. Persons making false statements will face discipline up to and including termination.

APPEARANCE & DRESS STANDARDS

Employees will maintain a clean, neat, well-groomed appearance at all times. Employees should avoid extremes in dress. Employees should dress themselves according to the requirements of their position, keeping in mind what an employer and the public may expect of a person in that position. If uniforms are required (**FR CLOTHING for Field Operations**), you are expected to wear and maintain them neatly and in good repair. Good personal hygiene is always essential. If a supervisor feels an employee's apparel or grooming is inappropriate or inadequate, an employee may be asked to leave the workplace until they are properly dressed or groomed. Under such circumstances, an employee who is hourly/non-exempt will not be compensated from the time away from work.

ATTENDANCE & WORK HOURS

Unless otherwise exempted from keeping a set schedule, you will be expected to maintain a schedule, to be on time and ready to work during your scheduled hours. **We are an Oilfield Service company that operates on a 24/7 schedule.** You might be required to work nights. Absence and tardiness places an unnecessary burden on everyone. Excessive absence or tardiness for any reason will not be tolerated. If you are unable to report to work, you must notify your Supervisor as far in advance as possible. He/she will advise you of the call-in procedures required. All personal time off will be without pay. For hourly/non-exempt employees, if you are late in arriving to work or returning from lunch, your pay will be docked for the lost time. Breaks—including meal breaks, if any—will be taken as approved/scheduled by a Supervisor, Your Supervisor must approve any changes in your work schedule or lunch break, in advance.



PAY INFORMATION TIME RECORDS

The Company will maintain accurate time records for all hourly/non-exempt employees, which requires employees to strictly comply with clock-in/clock-out procedures. Employees should not clock in prior to actually starting work, nor clock out later than when they actually stop working. The unauthorized alteration or falsifying of an employee’s time records as well as any arrangements to work “off the clock” will result in discipline up to and including termination of anyone involved. When an employee is for some reason required to work outside of their scheduled hours such that their time records reflect something other than their scheduled hours, the employee must alert their Supervisor so that appropriate notations to the time records can be made and steps can be taken to avoid or lessen any resulting overtime. At the end of each pay period, the employee must ensure that his/her hours are accurately reported and immediately notify their supervisor of any non-payment for any missing hours.

OVERTIME

We appreciate each employee’s commitment to his or her job. Employees are required to work to complete their tasks within their scheduled workweek. Occasionally, based on job necessity, you may be required to work overtime and as such will be paid overtime pay if you are hourly/non-exempt. Hourly & other non-exempt employees must be compensated at a rate of 1½ times their regular rate of pay for all hours worked in excess of forty in a given seven-day workweek, excluding non-worked time such as paid time off, sick pay, and holidays. The FLSA Law does not permit you to waive your right to overtime compensation. You are required to get approval from your Supervisor prior to working any overtime. By law, all overtime worked must be paid, even if not approved; however, working without prior approval, may result in disciplinary action up to and including termination. For more information on this topic, please see the Appendix A at the end of the handbook for relevant materials and/or consult the postings found at your workplace(s).

PAY DAYS

Wages are paid in accordance with the payday notice posted at the Worksite. You can access your paycheck earning statement on the [eESI](#) payroll portal, which will show your payroll deductions and allow you to print this information.

USE OF COMPANY-ISSUED CREDIT CARDS



If an employee is issued a credit card, its use will be strictly for business-related purposes, and subject to all applicable agreements between the Company, the employee, and/or the issuing credit card company. In addition to financial responsibility and liability for wage deductions, any unauthorized purchases an employee makes with a Company credit card will result in disciplinary action, up to and possibly including termination of employment, depending upon the severity and repeat nature of the offense.

MILEAGE / EXPENSE REPORTS / PER DIEMS

GWC recognizes that employees may be required to travel or incur other expenses from time to time to conduct business or make purchases on behalf of the Company. It is the policy of the Company to reimburse authorized, reasonable and necessary business expenses incurred by employees.

Expense Report

Expenses will be reimbursed by submission of a written Expense Report. The Expense Report, which shall be submitted each **WEEK** but no later than **Monday**. Your report should include an itemized list of all expenses for which reimbursement is requested. **Expenses that do not have supporting documents will be deducted from following payroll.**

Receipts

Receipts are required for all expenditures. Employees requesting reimbursement should submit with the Expense Report written receipts from each vendor showing the vendor's name, a description of the services provided, the date, and the total expenses, including tips (if applicable). A credit card receipt or statement may be used to document the vendor and date of an expense, provided other required details of the expenditure are fully documented.

CHANGES TO PERSONAL INFORMATION

If you change your address, email address, telephone number, or marital status, please change your information in the **GWC** office or notify your supervisor of the change as soon as possible. Also, as a reminder, you may want to change the number of withholding allowances or your withholding rate (marital status) on Form W-4 for any number of reasons, such as due to marriage or a change in the number of dependents.

COMPANY POLICIES

RULES OF CONDUCT

Employees who fail to maintain proper standards of conduct toward their work, their co-workers or the Company's customers, or who violate any of the Company's policies, are subject to appropriate disciplinary action, up to and including termination. All instances of misconduct should be referred to the Human Resources immediately. We want you to be aware that certain conduct seriously interferes with



the rights of your co-workers and/or the orderly operation of Company business. Accordingly, any employee who engages in the conduct listed below will be subject to IMMEDIATE TERMINATION. The list of offenses below is not all-inclusive and the Company may resort to IMMEDIATE TERMINATION whenever the employee, in the Company's judgment, engages in conduct warranting such action:

- Obscene and indecent conduct
- Stealing, embezzlement, dishonesty, falsifying records, or lying
- Reckless or willful damage that could or does result in injury or damage to Company property or the property of coworkers, customers, or any other person (includes the unauthorized use of property or equipment)
- Willful violation or disregard of safety, health, fire, security or employment regulations, signs and notices, to include smoking in unauthorized locations
- Refusal to perform work as directed by a supervisor or any other act of insubordination (including refusal or failure to perform assigned work)
- Excessive tardiness or absenteeism
- Willful neglect of duty, malingering, sleeping during work time
- Reporting to work impaired by alcohol, illegal drugs or controlled substances (employees using a prescription medication which might impair their functioning should advise their supervisor)
- Possession or use of alcoholic beverages on Company property, or using alcoholic beverages while engaged in Company business off the premises, except where authorized
- Using, possessing, selling, manufacturing, transporting or distributing illegal drugs or controlled substances on Company or Client premises, including the misuse of prescription drugs
- Possession of drug or narcotic paraphernalia on Company or Client premises
- Refusal to submit to a blood, urine or other test to detect the presence of alcohol, drugs or controlled substances
- Refusal to cooperate fully in any lawful investigation initiated by the Company or a Client
- Promoting or participating in gambling, bookmaking, etc., on the Company or Client's property or worksite
- Soliciting business from the Company or Client's existing customers while employed with the Company or Client
- Undue repetition of minor offenses
- Failing to maintain the confidentiality of Company, customer, or Client information
- Unprofessional conduct toward co-workers or customers
- Workplace violence (including fighting with or displaying other abusive behavior toward coworkers)
- Engaging in off-duty misconduct that reflects negatively on the Company or causes or has the potential to cause harm to the Company or its reputation
- Unauthorized removal of Company property from the Company premises
- Falsifying employment applications, other employment records, or any other Company document, including, but not limited to accounting forms, time records and personnel records
- Clocking or checking in for someone else or having someone else clock in or check in for you

GENERAL SAFETY RULES

It is our policy that everything possible will be done to protect employees, customers and visitors from accidents. Safety is a cooperative undertaking requiring participation by every employee. Failure by any



employee to comply with safety rules will result in disciplinary action up to and including termination. Supervisors shall insist that safety rules and practices be observed and take appropriate action when necessary. To carry out this policy, employees are required to do the following:

- Follow all health and safety rules and procedures per established OSHA standards, and comply with company safety and health policies
- Report unsafe conditions and equipment to your supervisor or safety coordinator
- Report all incidents, accidents, injuries, and illnesses to your supervisor or safety coordinator immediately
- The use or possession of intoxicating beverages, drugs, unauthorized firearms or other weapons on the job is forbidden and could result in immediate dismissal
- Horseplay, scuffling, and other acts which tend to have an adverse influence on the safety or well-being of the employees is prohibited
- Means of egress shall be kept unobstructed, well lighted and unlocked during working hours
- In the event of fire, alert others to the situation (sound alarm where available) and evacuate
- Wearing or using prescribed personal protective equipment as required / Safety Glasses, Hard Hat, Gloves, Steel Toe Boots, FR Clothing
- Employees should be alert to see that all guards and other protective devices are in proper places and adjusted, and they shall report deficiencies
- Refraining from the operation of any equipment without both proper instructions and authorization
- Do not eat, drink or smoke in areas where hazardous chemicals are present
- Work areas should be maintained in a neat and orderly manner at all times

VIOLENCE IN THE WORKPLACE

The Company strongly believes that all employees should be treated with dignity and respect. The Company has a zero tolerance policy for workplace violence, verbal and nonverbal threats and related actions. Any instances of violence or threats of violence must be immediately reported to the employee's supervisor and/or the Human Resources Department. All complaints will be fully investigated. The Company will not retaliate against any employee for reporting such an incident, and will not knowingly permit any retaliation by management or non-management employees. Employees who violate this policy will be subject to immediate disciplinary action, up to and including IMMEDIATE TERMINATION.

E-MAIL, VOICE MAIL, INTERNET, AND COMPUTER USE POLICY

The use of the Company electronic systems, including computers, fax machines, and all forms of internet/intranet access, is for Company business and for authorized purposes only. Brief and occasional personal use of the electronic mail system or the internet is acceptable as long as it is not excessive or



inappropriate, occurs during personal time (lunch or other breaks), and does not result in expense or harm to the Company or otherwise violate this policy. Use is defined as "excessive" if it interferes w

ith normal job functions, responsiveness, or the ability to perform daily job activities. Electronic communication should not be used to solicit or sell products or services that are unrelated to the Company's business; distract, intimidate, or harass coworkers or third parties; or disrupt the workplace. Use of Company computers, networks, and Internet access is a privilege granted by management and may be revoked at any time for inappropriate conduct carried out on such systems, including, but not limited to:

- Sending chain letters or participating in any way in the creation or transmission of unsolicited commercial e-mail("spam") that is unrelated to legitimate Company business
- Engaging in private or personal business activities, including excessive use of instant messaging and chatrooms (see below)
- Accessing networks, servers, drives, folders, or files to which the employee has not been granted access or authorization from someone with the right to make such a grant
- Making unauthorized copies of Company files or other Company data
- Destroying, deleting, erasing, or concealing Company files or other Company data, or otherwise making such files or data unavailable or inaccessible to the Company or to other authorized users of Company systems
- Misrepresenting oneself or the Company
- Violating the laws and regulations of the United States or any other nation or any state, city, province, or other local jurisdiction in any way
- Engaging in unlawful or malicious activities
- Deliberately propagating any virus, worm, Trojan horse, trap-door program code, or other code or file designed to disrupt, disable, impair, or otherwise harm either the Company's networks or systems or those of any other individual or entity
- Using abusive, profane, threatening, racist, sexist, or otherwise objectionable language in either public or private messages

- Sending, receiving, or accessing pornographic materials
- Becoming involved in partisan politics
- Causing congestion, disruption, disablement, alteration, or impairment of Company networks or systems
- Maintaining, organizing, or participating in non-work-related Web logs ("blogs"), Web journals, "chat rooms", or private/personal/instant messaging
- Failing to log off or lock any secure, controlled-access computer or other form of electronic data system to which you are assigned, if you leave such computer or system unattended
- Using recreational games; and/or defeating or attempting to defeat security restrictions on Company systems and applications. Consistent with federal law, you may use the Company's electronic systems to discuss with other employees the terms and conditions of employment. However, any such discussions should take place during non-duty times and should not interfere with your or your coworkers' assigned duties. You must comply with a coworker's stated request to be left out of such discussions. Use of company resources in violation of this policy will lead to discipline, up to and including termination. The Company will comply with reasonable requests from law enforcement and regulatory agencies for logs, diaries, archives, or files on individual Internet activities, e-mail use, and/or computer use.



OWNERSHIP AND ACCESS OF EMAIL, INTERNET/CLOUD-BASED MEDIA, AND COMPUTER FILES; NO EXPECTATION OF PRIVACY

The Company owns the rights to all data and files in any computer, network, or other information system used in the Company and to all data and files sent or received using any Company system or using the Company's access to any computer network, to the extent that such rights are not superseded by applicable laws relating to intellectual property. The Company also reserves the right to monitor electronic mail messages (including personal/private/instant messaging systems) and their content, as well as any and all use by employees of the internet and of computer equipment used to create, view, or access e-mail and Internet content. Employees must be aware that the electronic mail messages sent and received using Company equipment or Company-provided Internet access, including web-based messaging systems used with such systems or access, are not private and are subject to viewing, downloading, inspection, release, and archiving by Company officials at all times. The Company has the right to inspect any and all files stored in private areas of the network or on individual computers or storage media in order to assure compliance with Company policies and state and federal laws. No employee may access another employee's computer, computer files, or electronic mail messages without prior authorization from either the employee or an appropriate Company official. The Company uses software in its electronic information systems that allows monitoring by authorized personnel and that creates and stores copies of any messages, files, or other information that is entered into, received by, sent, or viewed on such systems. There is no expectation of privacy in any information or activity conducted, sent, performed, or viewed on or with Company equipment or Internet access. Accordingly, employees should assume that whatever they do, type, enter, send, receive, and view on Company electronic information systems is electronically stored and subject to inspection, monitoring, evaluation, and Company use at any time. Further, employees who use Company systems and Internet access to send or receive files or other data that would otherwise be subject to any kind of confidentiality or disclosure privilege thereby waive whatever right they may have to assert such confidentiality or privilege from disclosure. Employees who wish to maintain their right to confidentiality or a disclosure privilege must send or receive such information using some means other than Company systems or the Company-provided Internet access. The Company has licensed the use of certain commercial software application programs for business purposes. Third parties retain the ownership and distribution rights to such software. No employee may create, use, or distribute copies of such software that are not in compliance with the license agreement for the software. Violation of this policy can lead to disciplinary action, up to and including dismissal.

CONFIDENTIALITY OF ELECTRONIC MAIL

As noted above, electronic mail is subject at all times to monitoring, and the release of specific information is subject to applicable state and federal laws and Company rules, policies, and procedures on confidentiality. Existing rules, policies, and procedures governing the sharing of confidential information also apply to the sharing of information via commercial software. Since there is the possibility that any message could be shared with or without your permission or knowledge, the best rule to follow in the use of electronic mail for non-work-related information is to decide if you would post the information on the office bulletin board with your signature. It is a violation of Company policy for any employee,



including system administrators and supervisors, to access electronic mail and computer systems files to satisfy curiosity about the affairs of others, unless such access is directly related to that employee's job duties. Employees found to have engaged in such activities will be subject to disciplinary action.

E-MAIL TAMPERING

Electronic mail messages received should not be altered without the sender's permission; nor should electronic mail be altered and forwarded to another user and/or unauthorized attachments be placed on another's electronic mail message.

PERSONAL ELECTRONIC EQUIPMENT

The Company prohibits the use in the workplace of any type of camera phone, cell phone camera, digital camera, video camera, or other form of recording device to record the image or other personal information of another person, if such use would constitute a violation of a civil or criminal statute that protects the person's right to be free from harassment or from invasion of the person's right to privacy. The Company reserves the right to report any illegal use of such devices to appropriate law enforcement authorities. Due to the significant risk of harm to the Company's electronic resources, or loss of data, from any unauthorized access that causes data loss or disruption, employees should not bring personal computers or data storage devices (such as floppy disks, CDs/DVDs, external hard drives, USB / flash drives, "smart" phones, iPods/iPads/iTouch or similar devices, laptops or other mobile computing devices, or other data storage media, including cloud-based internet storage media) to the workplace and connect them to Company electronic systems unless expressly permitted to do so by the Company. To minimize the risk of unauthorized copying of confidential Company business records and proprietary information that is not available to the general public, any employee connecting a personal computing device, data storage device, or image recording device to Company networks or information systems thereby gives permission to the Company to inspect the personal computer, data storage device, or image-recording device at any time with personnel and/or electronic resources of the Company's choosing and to analyze any files, other data, or data storage devices or media that may be within or connectable to the data-storage device in question to ensure that confidential Company business records and proprietary information has not been taken without authorization. Employees who do not wish such inspections to be done on their personal computers, data storage devices, or imaging devices should not connect them to Company computers or networks. Violation of this policy, or failure to permit an inspection of any device under the circumstances covered by this policy, shall result in disciplinary action, up to and possibly including immediate termination of employment, depending upon the severity and repeat nature of the offense. In addition, the employee may face both civil and criminal liability from the Company, from law enforcement officials, or from individuals whose rights are harmed by the violation.

SOCIAL MEDIA POLICY



We understand that social media can be a fun and rewarding way to share your life and opinions with family, friends and coworkers around the world. However, use of social media also presents certain risks and carries with it certain responsibilities. To assist you in making responsible decisions about your use of social media, we have established these guidelines for appropriate use of social media. **GUIDELINES:** In the rapidly-expanding world of electronic communication, social media can mean many things. The term "social media" includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else's web log or blog, journal, or diary, personal website, social networking or affinity website, web bulletin board, or a chat room, whether or not associated or affiliated with the Company, as well as any other form of electronic communication. Ultimately, you are solely responsible for what you post online. Before creating online content, consider some of the risks and rewards that are involved. Keep in mind that any of your conduct that adversely affects your job performance, the performance of fellow associates or otherwise adversely affects members, customers, suppliers, people who work on behalf of the Company or the Company's legitimate business interests may result in disciplinary action up to and including termination.

KNOW AND FOLLOW THE RULES:

Carefully read these guidelines, as well as any other policies implicated by your use of social media (e.g., the Company's Confidentiality Policy, Discrimination & Harassment Policy, etc.) to ensure your postings are consistent with these policies. Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including termination.

BE RESPECTFUL: Always be fair and courteous to fellow associates, customers, members, suppliers, or people who work on behalf of the Company. Also, keep in mind that you are more likely to resolve work-related complaints by speaking directly with your co-workers or by going directly to any member of management than by posting complaints to a social media outlet. Nevertheless, if you decide to post complaints or criticism, avoid using statements, photographs, video, or audio that reasonably could be viewed as malicious, obscene, threatening, or intimidating, that disparage customers, members, associates, or suppliers, or that might constitute harassment or bullying. Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion, or any other status protected by law or Company policy.

BE HONEST AND ACCURATE:

Make sure you are always honest and accurate when posting information or news, and if you make a mistake, correct it quickly. Be open about any previous posts you have altered. Remember that the Internet archives almost everything; therefore, even deleted postings can be searched. Never post any information or rumors that you know to be false about the Company, fellow associates, members, customers, suppliers, people working on behalf of the Company, or competitors.

POST ONLY NON-CONFIDENTIAL, APPROPRIATE AND RESPECTFUL CONTENT: Maintain the confidentiality of Company trade secrets and private or confidential information. Trade secrets may include information regarding the development of systems, processes, products, know-how, and



technology. Do not post internal reports, policies, procedures, or other internal business-related confidential communications.

- Respect financial disclosure laws. It is illegal to communicate or give a "tip" on inside information to others so that they may buy or sell stocks or securities.
- Do not create a link from your blog, website, or other social networking site to the Company's website without identifying yourself as a Company employee.
- Express only your personal opinions. Never represent yourself as a spokesperson for the Company. If the Company is a subject of the content you are creating, be clear and open about the fact that you are an employee and make it clear that your views do not represent those of the Company, fellow employees, members, customers, suppliers, or people working on behalf of the Company. If you do publish a blog or post online related to the work you do or subjects associated with the Company, make it clear that you are not speaking on behalf of the Company. It is best to include a disclaimer such as "The postings on this site are my own and do not necessarily reflect the views of the Company."

USE OF SOCIAL MEDIA AT WORK:

Refrain from using social media while on work time or on equipment we provide, unless it is work-related as authorized by your manager or consistent with all other applicable policies (e.g., the Company's Information, Property, and Equipment Policy). Do not use Company e-mail addresses to register on social networks, blogs, or other online tools utilized for personal use.

COMPANY INFORMATION, PROPERTY & EQUIPMENT

The protection of the Company's business information, property, equipment and all other Company assets are vital to the interests and success of the Company. Employees must exercise utmost care in using these items, and should never use items they have not been authorized and trained to use. No Company-related information or property, including without limitation, documents, files, records, and computer files, equipment, and office supplies or similar materials (except in the ordinary course of performing duties on behalf of the Company) may, therefore, be removed from the Company's premises or used for non-Company-related reasons without supervisor approval. Loss, damage, malfunctioning or theft of Company property and/or equipment should be reported immediately to your supervisor. Violations of this policy, including negligence in the care and use of Company property, will result in discipline, up to and including termination. When an employee leaves the Company, the employee must return to the Company all Company-related information and property that the employee has in his/her possession, including without limitation, hard copy documents, electronic files, manuals, information stored on a personal computer or on a computer disk, credit cards, office keys or pass cards, supplies, and equipment or office supplies. Company property and/or equipment should be returned in good working condition as employees are liable for lost or damaged property or equipment, as permitted by law.

PERSONAL PHONE CALLS

The Company acknowledges that occasionally personal phone calls are necessary. These calls, and the length thereof, must be held to an absolute minimum. If all lines are in use, please terminate your call immediately to make business lines available. Long distance personal calls must **not** be charged to the business phone under any conditions.



USING MOBILE PHONES WHILE DRIVING OR OPERATING EQUIPMENT

Our company encourages the safe use of mobile telephones by employees who use them to conduct business for our company. Employees who use hand-held mobile phones while on company business should refrain from making or receiving business **calls while driving or operating equipment**. Any mobile phone use should comply with all applicable laws and ordinances respecting the use of mobile telephones. If an employee needs to make or receive a business or emergency phone call while driving, the employee should make sure the vehicle is stopped and that he or she is parked in a proper parking area for the call. Employees are encouraged to use hands-free devices, and should keep business conversations brief while driving, and must stop the vehicle and park in a proper parking area if the conversation becomes involved, traffic is heavy, or road conditions are poor. Employees in possession of company mobile phones are required to take appropriate precautions to prevent theft and vandalism. Employees violating this policy may be subject to disciplinary action up to and including termination.

COMPANY VEHICLE/AUTOMOBILE USAGE

The company provides vehicles for business use to allow employees to drive on company-designated business and to reimburse employees for business use of personal vehicles according to the guidelines below. The company retains the right to amend or terminate this policy at any time. (The term "vehicle," as used in these guidelines, includes, but is not limited to, cars, trucks, backhoes, front-end loaders, graders and any motorized equipment.)

- Employees may not drive any business vehicles without prior approval of their supervisor. Periodically, before approving a driver, LOSS PREVENTION will check the employee's driving record, with the employee's consent, and verify the existence of a valid driver's license. Employees approved to drive on company business are required to inform their supervisor of any changes that may affect either their legal or physical ability to drive or their continued insurability.
- Employees holding jobs requiring regular driving for business as an essential job function must, as a condition of employment, be able to meet the driver approval standards of this policy at all times. For all other jobs, driving is considered only an incidental function of the position.
- If possible, company vehicles will be permanently assigned to departments that have demonstrated a continued need for them. Additional vehicles are maintained in our Shop for use by individual employees, as needed.
- Employees who need transportation in the course of their normal work may be assigned a company vehicle for their use. All other employees needing transportation for company business may use vehicles assigned to their department or those drawn from the Mission yard. As a last alternative, when no company vehicles are available, employees may use their own vehicles for business purposes **with prior approval** of management.



- Employees who drive a vehicle on company business must, in addition to meeting the approval requirements above, exercise due diligence to drive safely and to maintain the security of the vehicle and its contents. Employees are also responsible for any driving infractions or fines as a result of their driving.
- Nonemployees and nonbusiness passengers (i.e., family and friends) are prohibited from riding in company vehicles.
- Employees who use their personal vehicles for approved business purposes will receive a mileage allowance equal to the Internal Revenue Service optional mileage allowance for such usage. This allowance is to compensate for the cost of gasoline, oil, depreciation and insurance. Employees who operate personal vehicles for company business should obtain auto liability coverage for bodily injury and property damage with a special endorsement for business use, when necessary as determined by their personal insurance agent. **MUST BE APPROVED BY MANAGEMENT**
- Employees must report any accident, theft or malicious damage involving a company vehicle to their supervisor and the Personnel Department, regardless of the extent of damage or lack of injuries. Such reports must be made as soon as possible but no later than 48 hours after the incident. Employees are expected to cooperate fully with authorities in the event of an accident. However, employees should make **no voluntary statement** other than in reply to questions of investigating officers.
- Employees who are on call on a 24-hour basis may be allowed to take a company vehicle home so they can respond as soon as possible. Such employee acknowledges that they fully understand that the vehicle is used only as part of emergency response and **not for personal use.**
- Employees are not permitted, under any circumstances, to operate a company vehicle or a personal vehicle for company business when any physical or mental impairment causes the employee to be unable to drive safely. Additionally, employees shall not operate any company vehicle at any time or operate any personal vehicle while on company business while using or consuming alcohol, illegal drugs or prescription medications that may affect their ability to drive. These prohibitions include circumstances in which the employee is temporarily unable to operate a vehicle safely or legally because of impairment, illness, medication or intoxication.

CONFLICT OF INTEREST

Employees will conduct business according to the highest ethical standards of conduct. They will devote their best efforts to the interests of the Company. Business dealings that do create or even appear to create a conflict of interest are unacceptable. While employees may engage in activities outside of their employment that are of a private nature and unrelated to our business, the employee must disclose any possible conflicts so that the Company may assess and prevent actual or perceived conflicts of interest from arising. A potential or actual conflict of interest occurs whenever an employee is in a position to influence a decision that may result in a personal gain for the employee or an immediate family member (i.e., spouse or significant other, children, parents, siblings) as a result of the Company's business dealings or situations where an employee and his or her immediate family own or hold any significant interest in a supplier, customer or competitor of the Company.



If an employee has any question whether an action or proposed action had or will create a conflict of interest, he or she should immediately contact Human Resources to obtain advice on the issue. An employee must also promptly disclose actual or potential conflicts of interest as described above, in writing, to his or her supervisor as soon as they become aware of them and regardless of whether they had any role in creating the situation in question. A violation of this policy will result in discipline, up to and including immediate termination.

OUTSIDE EMPLOYMENT

Because of the potential for violation of the Conflict of Interest policy above, employees must obtain written approval from their supervisor before participating in outside employment or other business activities outside of normal working hours, provided such arrangement neither creates a conflict of interest, nor detracts from performance and/or effectiveness while working for the Company, and provided the employee does not offer or provide such services to the Company. In general, outside employment and business activities are not allowed when they will potentially:

- prevent the employee from fully performing work for which he or she is employed at the Company, including overtime assignments
- involve organizations that are doing / seeking to do business with the Company, including actual / potential vendors / customers
- violate the Company's policies or rules

Employees are hired and continue in the Company's employ with the understanding the Company is their primary employer and therefore outside employment that conflicts with an employee's obligations to Company must be avoided at all times.

Personal Relationships Policy

Objective

GWC strives to provide a work environment that is collegial, respectful and productive. This policy establishes rules for the conduct of personal relationships between employees, including supervisory personnel, in an attempt to prevent conflicts and maintain a productive and friendly work environment.

Procedure

A "personal relationship" is defined as a relationship between individuals who have or have had a continuing relationship of a romantic or intimate nature.



An employee who is involved in a personal relationship with another employee may not occupy a position in the same department as, work directly for or supervise the employee with whom he or she is involved.

GWC reserves the right to take prompt action if an actual or potential conflict of interest arises concerning individuals who engage in a personal relationship that may affect terms and conditions of employment. Supervisors and managers are prohibited from dating subordinates and may be disciplined for such actions, up to and including termination.

When a conflict or the potential for conflict arises because of a personal relationship between employees, even if there is no line of authority or reporting involved, the employees may be separated by reassignment, or terminated from employment. If such a personal relationship between employees develops, it is the responsibility and obligation of the employees involved to disclose the existence of the relationship to the department director or manager.

When a conflict or a potential for conflict affecting terms or conditions of employment arises because of the relationship, the individuals concerned will be given the opportunity to decide who is to be transferred to another position, or terminated, if no position is available. If no decision is made within 30 calendar days of the offer to resolve the situation, GWC will determine who is to be transferred or, if necessary, terminated from employment.

Employee Dating Policy

Objective

GWC strongly believes that a work environment where employees maintain clear boundaries between employee personal and business interactions is necessary for effective business operations. Although this policy does not prevent the development of friendships or romantic relationships between co-workers, it does establish boundaries as to how relationships are conducted during working hours and within the working environment.

Individuals in supervisory or managerial roles, and those with authority over others' terms and conditions of employment, are subject to more stringent requirements under this policy due to their status as role



models, their access to sensitive information, and their ability to affect the employment of individuals in subordinate positions.

This policy does not preclude or interfere with the rights of employees protected by the National Labor Relations Act or any other applicable statute concerning the employment relationship.

Procedures

1. During working time and in working areas, employees are expected to conduct themselves in an appropriate workplace manner that does not interfere with others or with overall productivity.
2. During non working time, such as lunches, breaks, and before and after work periods, employees engaging in personal exchanges in nonwork areas should observe an appropriate workplace manner to avoid offending other workers or putting others in an uncomfortable position.
3. Employees are strictly prohibited from engaging in physical contact that would in any way be deemed inappropriate in the workplace by a reasonable person while anywhere on company premises, whether during working hours or not.
4. Employees who allow personal relationships with co-workers to adversely affect the work environment will be subject to GWC's disciplinary policy, including counseling for minor problems. Failure to change behavior and maintain expected work responsibilities is viewed as a serious disciplinary matter.
5. Employee off-duty conduct is generally regarded as private, as long as such conduct does not create problems within the workplace. An exception to this principle, however, is romantic or sexual relationships between supervisors and subordinates.
6. Any supervisor, manager, executive or other company official in a sensitive or influential position with GWC must disclose the existence of a romantic or sexual relationship with another co-worker. Disclosure may be made to the individual's immediate supervisor or the director of human resources (HR). GWC will review the circumstances to determine whether any conflict of interest exists.
7. When a conflict-of-interest or potential risk is identified due to a company official's relationship with a co-worker, GWC will work with the parties involved to consider options for resolving the problem. The initial solution may be to make sure the parties no longer work together on matters where one is able to influence the other or take action for the other. Matters such as hiring, firing, promotions, performance management, compensation decisions and financial transactions are



examples of situations that may require reallocation of duties to avoid any actual or perceived reward or disadvantage. In some cases, other measures may be necessary, such as transfer of one or both parties to other positions or departments. If one or both parties refuse to accept a reasonable solution, such refusal will be deemed a voluntary resignation.

- 8. Failure to cooperate with GWC to resolve a conflict or problem caused by a romantic or sexual relationship between co-workers or among managers, supervisors or others in positions of authority in a mutually agreeable fashion may be deemed insubordination and result in disciplinary action up to and including termination.
- 9. The provisions of this policy apply regardless of the sexual orientation of the parties involved.
- 10. Where doubts exist as to the specific meaning of the terms used above, employees should make judgments based on the overall spirit and intent of this policy.
- 11. Any concerns about the administration of this policy should be addressed to the director of HR.

ACCEPTANCE OF GIFTS & ENTERTAINMENT

No employee may solicit any gifts nor accept gifts of more than nominal value (*i.e.*, in excess of \$20), accept lavish entertainment events or receive other benefits from potential and actual customers, suppliers or competitors. An employee may entertain potential or actual customers if such entertainment is consistent with accepted business practices, does not violate any law or generally accepted ethical standards and the public disclosure of facts will not embarrass the Company.

WORKPLACE SAFETY and WORKPLACE INJURY REPORTING

In the event of a Serious Injury, call 911 immediately. The first priority is to ensure the employee receives medical treatment. Most injuries are not medical emergencies, and this information will provide you injury reporting instructions to ensure you receive timely medical care. The following must be fulfilled:

- Employee’s Injury Reporting Responsibility: all employees must immediately report all work related injuries or illnesses to their Supervisor.
- Employer’s Injury Reporting Responsibility: The Supervisor must notify GWC within 8 hours of receiving the notice of the injury. During office hours, Monday – Friday, 8am to 5pm, report the injury to GWC Claims Management Office at 956-607-5099, or GWC Corporate Office at 956-796-1256. Afterhours, report the claim by calling 956-607-5099. Please report all injuries as soon as possible, late reporting could possibly delay the claimant’s medical treatment, or the claim could be denied by the Company’s insurance carrier.



- Drug Testing: The Supervisor must ensure the injured employee receives a drug test at time medical treatment is provided, no later than 24 hours after the time of injury. If an employee refuses to submit to a drug test, the claim may not be covered under the Company’s workers’ compensation policy.
- Employer’s First Report of Injury: in order to start the claims handling process, the Supervisor or Company Representative must report to Loss Prevention to complete the Employer’s First Report of Injury form.
- Refusal of Medical Treatment: if an employee refuses medical treatment, he/she is still required to take a drug test within 24 hours of the injury, complete the Refusal of Medical Treatment form, and send a copy of the form to Manuel Salazar at msalazar@gwctx.com, or call 956-607-5099.

WORKERS’ COMPENSATION FRAUD

Special Units have been established to report and investigate allegations of worker, employer, and medical provider fraud. Workers’ Compensation Fraud is a FELONY that can result in **FINE, IMPRISONMENT, RESTITUTION, and LOSING YOUR JOB.**

BENEFITS

FAMILY AND MEDICAL LEAVE ACT (FMLA)

For qualifying employers and employees with qualifying medical-leave reasons, the Company uses a 12-month rolling period to measure the amount of FMLA-qualifying leave that may be taken. All accrued and available sick and/or vacation hours must be used prior to entering an unpaid status. Employees will not continue accruing vacation time or another PTO during FMLA leave, consistent with Company policy. To ensure no confusion on whether an employee, employer or leave situation falls under the FMLA, all questions about family and medical leave issues should be directed to Human Resources at 956-225-6758. For more information on this topic, please see the Appendix B at the end of the handbook for relevant materials and/or consult the postings found at your workplace(s).

LIMITATIONS ON LEAVES OF ABSENCE

With the exception of leaves of absence for military duty, no leave of absence, by itself or in combination with other periods of leave, may last longer than six months. Any employee who for any reason or combination of reasons misses a total of six months of work in a twelve-month period, or a total of nine months of work in an eighteen-month period, will be separated from employment due to unavailability for work, subject to any reasonable accommodation duties the Company may have under the ADA or similar law. Any employee so separated will be eligible for rehire and will be able to apply for any vacancies that may exist at any given time, depending upon qualifications and availability of job openings.



EMPLOYEE ASSISTANCE PROGRAM (EAP)

The Company cares about the health and well-being of its employees and recognizes that a variety of personal problems can disrupt their personal and work lives. While many employees solve their problems either on their own or with the help of family and friends, sometimes employees need professional assistance and advice. Employees and their immediate household members have access to an Employee Assistance Program (EAP) to help with the everyday challenges of life that may affect your health, family life and desire to excel at work. Through the Employee Assistance Program (EAP), the Company provides **confidential** access to professional counseling services for help in confronting such personal problems as alcohol and other substance abuse, marital and family difficulties, financial or legal troubles, and emotional distress. For more information on this topic, please see the Appendix C at the end of the handbook for relevant materials and/or consult the postings found at your workplace(s).

JURY DUTY

Jury duty is a civic responsibility. You will be excused from work without pay to satisfy that obligation, unless state law requires payment. Advise your supervisor when you are released from jury duty, so that you can be scheduled back to work. Some State laws require jury duty pay and as such state law will take precedence.

DRUG & ALCOHOL USE & SEARCHES POLICY REGARDING EMPLOYEE ALCOHOL & DRUG USE

The Company considers the workforce as its most important and valuable resource. Your health, welfare, safety and general well-being are essential to the success of our Company. Substance abuse of any kind will not be condoned. Employees under the influence of alcohol and/or drugs, prescribed or illegal, represent a danger to you and your coworkers, as well as equipment and products with which you come in contact. Working under the influence of either alcohol and/or drugs represents an unacceptable risk in terms of compromised workplace and public safety, decreased productivity, increased absenteeism and medical costs and poor quality work. Therefore, any employee who, while at work, consumes, uses or is under the influence of alcohol, drugs or inhalants will be subject to disciplinary action, including possible termination. If any employee is taking any prescribed medication that could in any way impair the employee's work or pose a danger to anyone, he/she must consult with a supervisor to address the situation. Blood and/or urine samples or other medical tests may be required of an employee at any time and screened by a laboratory for the presence of alcohol, drugs and controlled substances.

REASON-TO-BELIEVE DRUG TESTING & SEARCH

We expect all employees to share our concern for a safe and healthy work environment, and to willingly abide by these simple and necessary rules. Incidents of behavior or productivity changes may cause management to believe that an employee's behavior may be influenced by either drugs or alcohol. In these instances, the employee will be requested to undergo certain drug testing to prove or disprove that we have "Reason to Believe" there may be a problem. Also, employee's lockers, storage areas, vehicles



and person are subject to search for unauthorized substances or suspected theft while on Company or Client property, if there is "Reason to Believe". The following conditions are some, but not all inclusive, of what constitute basic "Reason to Believe" justification:

- On-the-job accidents
- Abrupt change in behavior
- Fighting, arguing or insubordination
- Damage to Company, Client Company or customer's equipment or property
- Excessive absence or patterns of absence and tardiness
- Falsifying records or lying
- Abnormal conduct or erratic behavior while at work, or significant deterioration in work performance
- Sleeping on duty
- Refusal to report injuries and/or receive medical care
- Changes in physical appearance (example; glazed eyes, agitated or lethargic demeanor, manner of walking, coordination, slurred speech, body odor etc.)
- Unsafe acts
- Evidence that the employee has tampered with current drug test results
- Evidence that the employee has used, possessed, sold, solicited, or transferred drugs while working or at work

SEARCHES GENERALLY

The Company reserves the right to conduct searches to monitor compliance with rules concerning safety of employees, security of Company and individual property, drugs and alcohol, and possession of other prohibited items. "Prohibited items" includes illegal drugs, alcoholic beverages, prescription drugs or medications not used or possessed in compliance with a current valid prescription, weapons, any items of an obscene, harassing, demeaning, or violent nature, and any property in the possession or control of an employee who does not have authorization from the owner of such property to possess or control the property. "Control" means knowing where a particular item is, having placed an item where it is currently located, or having any influence over its continued placement. In addition to Company premises, the Company may search employees, their work areas, lockers, personal vehicles if driven or parked on company property, and other personal items such as bags, purses, briefcases, backpacks, lunch boxes, and other containers. In requesting a search, the Company is by no means accusing anyone of theft, some other crime, or any other variety of improper conduct. There is no general or specific expectation of privacy in the Company's workplace, either on the premises of the Company or while on duty. In general, employees should assume that what they do while on duty or on the Company premises is not private. All employees and all of the areas listed above are subject to search at any time; if an employee uses a locker or other storage area at work, including a locking desk drawer or locking cabinet, the Company will either furnish the lock and keep a copy of the key or combination, or else allow the employee to furnish a personal lock, but the employee must give the Company a copy of the key or combination. The areas in question may be searched at any time, with or without the employee being present. As a general rule, with the exception of items relating to personal hygiene or health, no employee should ever bring anything to work or store anything at work that he or she would not be prepared to show and possibly turn over to Company officials and/or law enforcement authorities. All employees are subject to this policy. However, any given search may be restricted to one or more specific individuals, depending upon the situation. Searches may be done on a random basis or based upon reasonable suspicion. "Reasonable suspicion" means circumstances suggesting to a reasonable person that there is a possibility that one or more individuals may be in possession of a prohibited item as defined above. Any search under this policy will be done in a manner protecting employees' privacy, confidentiality, and personal dignity to the



greatest extent possible. The Company will respond severely to any unauthorized release of information concerning individual employees. No employee will ever be physically forced to submit to a search. However, an employee who refuses to submit to a search request from the Company will face disciplinary action, up to and possibly including immediate termination of employment.

Additionally, I understand that if I have any questions or concerns regarding these policies and my responsibilities that I am to discuss the issues with my supervisor, manager or human resources.

Employee Signature

Date

Employee Name

Date

Witness Signature

Date

Witness Name

- APPENDIX A: Enrollment Packet**
- APPENDIX B: W4**
- APPENDIX C: I9**
- APPENDIX D: Enterprise Form B**
- APPENDIX E: Fleet Fuel Policy**
- APPENDIX F: Payroll Advance Form**
- APPENDIX G: New Employee Information Form**
- APPENDIX H:**