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## **4.2 EMPLOYEE CLASSIFICATIONS**

Your wages, benefits and job duties are determined, in part, by your classification and job title. The following classifications are used throughout this Employee Handbook.

### **4.2.1 REGULAR FULL-TIME EMPLOYEES**

An employee who works a full-time work week of 40 hours and whose position is not considered to be of a part-time or temporary nature.

### **4.2.2 REGULAR PART-TIME EMPLOYEES**

An employee who is hired to work less than a full-time work week of 40 hours. Part-time employees accrue PTO on a pro-rated basis. If they work at least 30+ hours per week, they are eligible for benefits.

### **4.2.3 TEMPORARY EMPLOYEES**

An employee who is hired for a specific project or specific period of time. Temporary employees are not eligible to receive benefits or PTO. Interns and seasonal employees are temporary employees.

### **4.2.4 NON-EXEMPT EMPLOYEES**

A non-exempt employee is one to whom the minimum wage and overtime requirements of the Federal Fair Labor Standards Act and the Alaska Wage and Hour Act apply. Non-exempt employees are compensated on an hourly (rather than salary) basis and receive overtime pay at the rate of 1.5 times the regular rate of pay for all hours worked in excess of 8 per day and/or 40 per week. Employees can be classified as non-exempt and be regular full-time, regular part-time or temporary employees.

### **4.2.5 EXEMPT EMPLOYEES**

An exempt employee is one who is employed in a qualifying executive, administrative, professional, or other capacity, as defined by the Fair Labor Standards Act. Exempt employees are compensated on a salary basis, for performing work regardless of the time it takes to complete the work. Exempt employees do not receive overtime pay for hours worked in excess of 8 per day and/or 40 per 7 day week. Managers may require exempt employees to report to work according to a schedule and may also require employees to notify the manager in advance of not reporting to work according to that schedule.

## **4.3 RECORDING TIME**

All employees, regardless of title or exempt/non-exempt status, must keep accurate records of hours worked (daily and weekly). Accurate time records are subject to inspection by federal and state authorities.

#### 4.4 WORK HOURS

Bristol Adventures' normal workday for a full-time employee is eight hours plus an unpaid lunch period (normally 1 hour). Your supervisor will notify you of any deviations to this expectation. Employees are expected to be punctual and ready for work for the fully assigned duty time.

#### 4.5 OVERTIME

Only non-exempt employees are eligible for overtime pay. The normal work week is 40 hours, but occasions may arise during which you may be required to work overtime. Any overtime work performed by non-exempt employees must be PRE-AUTHORIZED by your supervisor.

#### 4.6 NO COMPENSATORY "COMP" TIME

Bristol Adventures does not have a compensatory "comp" time policy. Non-exempt employees who are paid hourly must record and use appropriate leave time for all full and partial day absences, including non-work-related appointments and meetings. Because any hours worked, in excess of 8 per day must be paid at an overtime rate, non-exempt employees may not "make up" for work absences by working extra time on another day. Similarly, non-exempt employees may not work during the lunch hour in addition to a regular 8-hour workday without prior supervisor approval to work overtime. Exempt employees are expected to be present during normal work hours.

#### 4.7 TELECOMMUTING

It is the policy of Bristol Adventures to provide telecommuting opportunities on a limited basis when it is in the interest of both the employee and the company. Bristol Adventures is a company where employees work very closely with each other and working in the office area creates teamwork, cooperation and a sense of ownership of one's company.

Telecommuting is defined as working away from the office on a regular basis, typically in one's home or alternative work location. Employees wishing to telecommute must ensure that the alternative work location is equipped to fulfill the needs of one's job. This includes electronic communications, telephone communications, proper insurance and adequate time and space away from distractions and familial obligations.

Telecommuting situations can be initiated either by the employee or the company, but must be approved by the President & CEO.

Positions requiring a high degree of supervision or direct client contact on a frequent basis are not normally considered for telecommuting opportunities due to the nature of the work.

Each instance of a request for a telecommuting situation is unique and must be considered based upon the merits of the situation, the needs of the employee, the needs of the company and with consideration as to the effect the telecommuting will have on the efficiency of the office and other employees.

## 4.8 PERSONNEL RECORDS

The Human Resources Department shall be responsible for maintaining pertinent, confidential information as required for all employees.

In addition, the Human Resources Department shall maintain a confidential personnel file for each employee, which shall include:

- A document stating the employee salary, other compensation, and job classification and effective hiring date.
- Employment application, resume, other application materials and any employment correspondence including notification of employment.
- Current job description, which shall include a written statement of duties and responsibilities and the education, experience, knowledge, and skills required for the position.
- Personnel evaluations, including changes in job, income, or tenure.
- Record of disciplinary actions including admonitions, reprimands, probationary suspension or other adverse personnel actions.
- Letters or certificates of appreciation.
- Other information deemed necessary and appropriate.

You are entitled to review your personnel file, with appropriate notice.

## 4.9 TRAVEL EXPENSES

Bristol Adventures will pay for the actual cost of reasonable expenses such as transportation, lodging, meals, sundries and necessary laundry costs incurred by employees traveling on authorized Bristol Adventures business. All expenses must be approved by the employees' supervisor and submitted to the Accounting Department. All employees are responsible for managing their travel expenses in the best interest of Bristol Adventures.

### 4.9.1 LOCAL TRAVEL

Subject to supervisor approval, employees who use their personal vehicle for business-related local travel may be reimbursed for the miles driven at the current IRS mileage rate and for actual parking fees.

### 4.9.2 AIR TRAVEL

Employees are permitted to fly first-class only when, in the department manager's opinion, first class travel is essential in optimizing efficiency, productivity and value and advanced authorization is granted.

### 4.9.3 REIMBURSEMENT PROCEDURE

Expense reimbursement forms can be obtained from the Accounting Department. All receipts for charges over \$25 must be retained and turned in with the expense report.

#### 4.10 CREDIT CARDS / P-CARDS

Bristol Adventures' Accounting Department will provide all applicable forms and policies. Timely and accurate expense reporting is requisite for every authorized P-Card holder.

## 5. COMPENSATION

### 5.1 PAY PERIODS AND PAYDAYS

Pay periods at Bristol Adventures are bi-weekly. Employees are paid once every two weeks, resulting in 26 pay periods per year. The pay period starts on Monday and continues for 14 days, through Sunday. Paydays occur on Friday following the end of the pay period. Because paydays are every two weeks, some months will have 3 paydays.

### 5.2 DIRECT DEPOSIT

Paychecks are issued every two weeks by direct deposit, unless other arrangements are previously requested in writing.

## 6. GRATUITY

Eligible employees may participate in a company's Tip Pool, which follows the requirements of Alaska State Law. Employees who are Managers are not eligible to participate in the Tipped Employees' Tip Pool. Employees must check their individual offer letter for eligibility status.

### 6.1 TIPPED EMPLOYEES

To participate in a company's Tip Pool, the following eligibility requirements apply (Tipped Employees):

- Must be an employee engaged in an occupation in which the employee customarily and regularly receives more than \$30 per month in tips.
- Tipped Employees cannot include an employee whose primary duty is not direct customer service, who works out of the public eye. Tipped Employees do not include Bartenders who work at Brooks Lodge (see below).
- Scheduled days off does not affect an employee's eligibility to participate in the daily Tip Pool.
- An employee who is not present for lodge operations for more than eight hours in a day is not eligible to participate in that day's Tip Pool. For example, an employee who leaves lodge operations to attend a wedding offsite for two days is not eligible to participate in the Tip Pool related to those two days.

- Cash tips received by employees directly from guests, that are turned in to the designated tip pool administrator will be combined with the tips received by the company from guests via cash, check or credit card and then divided equally amongst all eligible Tipped Employees. Cash, check, and credit card tips will be paid on a bi-weekly basis as noted on the employee's paycheck.

## **6.2 BROOKS LODGE BARTENDER**

Any employee working at Brooks Lodge as a Bartender is not considered a Tipped Employee and thus, is not eligible to participate in the company's Tip Pool. All tips received by the Brooks Lodge Bartender during his or her shift are the sole property of that Bartender, but must report tips to their employer as required by the IRS. Cash tips are collected by the Bartender daily and check/credit card tips will be paid on a bi-weekly basis as noted on the employee's paycheck.

## **6.3 TIP SHARING**

Bristol Adventures does not limit or prohibit Tipped Employees from voluntarily sharing tips with Non-Tipped Lodge Employees.

# **7. BENEFITS**

Bristol Adventures provides various benefits to eligible employees.

## **7.1 MEDICAL, DENTAL AND VISION INSURANCE**

Eligible employees may enroll in medical, dental and vision insurance programs. Coverage begins on the first day of the month after the date of hire. These programs offer a broad range of protection, which is outlined in the benefit booklet. Claim forms and additional program information can be obtained from the Human Resources Department.

## **7.2 GROUP TERM LIFE INSURANCE**

Eligible employees are provided life insurance coverage on the first day of the month after the date of hire. See Human Resources Department and/or the insurance booklet for more information.

## **7.3 401(K) RETIREMENT PLAN**

Eligible employees may participate in the BBNC 401(k) Retirement Plan in accordance with the terms of the 401(k) Retirement Plan documents. Bristol Adventures will begin matching an eligible employee's contribution on a dollar for dollar basis, up to 5% of the employee's salary, on January 1 or July 1, after completion of 1,000 hours of service in a computation period. In addition, on an annual basis, there may be a discretionary contribution of 0%-5% of eligible compensation in the form of a Profit Sharing contribution for all eligible employees per the 401(k) Retirement Plan documents.

See the Human Resources Department for further information. Note: the IRS establishes contribution limits and withdrawal terms annually and there may be penalties for early withdrawal.

The BBNC 401(k) Retirement Plan's official terms are set forth in the document entitled "Bristol Bay Native Corporation 401(k) Savings Plan," along with any amendments to that document (Plan). The Plan administrator will only use the official Plan to administer the Plan and resolve any disputes. If there is a discrepancy between this Employee Handbook and the Plan, the Plan will control.

#### **7.4 HOLIDAYS**

Bristol Adventures recognizes the following Holidays for all regular full-time exempt and non-exempt employees:

- New Year's Day
- Presidents Day
- Thanksgiving Day
- Friday after Thanksgiving
- Christmas Eve
- Christmas Day
- New Year's Eve

Regular full-time non-exempt employees also receive three Floating-Holidays each year. Regular non-exempt employees will receive 8 hours pay for each Holiday or Floating-Holiday taken.

Regular full-time exempt employees do not receive Floating-Holidays.

Part-time employees and temporary employees do not receive Holidays or Floating-Holidays.

Floating-Holidays may be taken on any date as determined by the employee with prior approval from their supervisor.

Floating-Holidays must be used in 8 hour increments and used by the end of the calendar year (December 31) of each year. Floating-Holidays not used in the calendar year do not carry forward into the next year.

In the event a regular full-time non-exempt employee is required to work on a recognized holiday, that employee shall receive their normal pay for their actual hours worked on that day, plus an additional 8 hours of holiday pay at the employee's regular rate of pay.

When a holiday falls on a weekend, it shall be observed on the preceding Friday or following Monday as determined by the company.

When a holiday falls during the employee's PTO, the holiday is counted as a holiday and is not counted against PTO.

## 7.5 PAID TIME OFF (PTO)

Bristol Adventures grants Paid Time Off (PTO) to eligible employees rather than vacation and/or sick leave. The purpose of PTO is to provide employees with flexible paid time off from work that can be used for such needs as vacation, personal or family illness, doctor appointments, school, volunteerism, and other activities of the employee's choice. It is the policy of Bristol Adventures that all absences from regularly scheduled work require the employee to use available PTO.

Part-time employees and temporary employees are not eligible to accrue PTO.

There are two PTO policies offered to regular full-time employees differentiated by employment status. 1. Exempt or 2. Non-Exempt as outlined below.

- **Regular Full-time Exempt Employees** qualify for an Unlimited PTO policy where no set amount of PTO accrues over time. Employees are afforded to take PTO at the time and in the amount their Direct Supervisor authorizes in advance and subject to the understanding that employees must prioritize their work responsibilities and maintain productivity. Because Unlimited PTO does not accrue time, there is no carry-over PTO bank or PTO cash outs at any time including termination or resignation; except for exempt employees who have a PTO balance at the time Bristol Adventures transitioned from PTO accruals to Unlimited PTO on 12/23/2024. In such cases, no additional PTO accruals will occur, the max year-end carry-over set forth below does not apply, and the existing balance held by the exempt employee will be paid to the exempt employee at the end of the exempt employee's employment.
- **Regular Full-time Non-exempt Employees** will accrue PTO bi-weekly based on the following rules.

### 7.5.1 PTO ACCRUAL GUIDELINES FOR FULL-TIME NON-EXEMPT EMPLOYEES:

- PTO accruals are based upon paid hours up to 2,080 hours per year, excluding overtime.
- Annual PTO accruals cycle on the calendar year, ending December 31, 2025 and each year thereafter.
- Length of service and hiring negotiations determine the rate (level) an employee accrues PTO as designated in the employee's offer letter.
- Employees become eligible for the higher accrual rate on the first day of the pay period in which the employee's anniversary date falls.
- PTO accrual levels are based on the following chart (unless otherwise specified in the employee's offer letter).

LEVEL	YEARS OF SERVICE	DAYS PER YEAR	HOURS PER YEAR	HOURS ACCRUED BI-WEEKLY	MAX YEAR-END CARRY OVER
1	1	11	88	3.38	80
2	2 - 3	13	104	4	80
3	4 - 5	15	120	4.62	80
4	6 - 10	20	160	6.16	80
5	11 - 15	25	200	7.7	160
6	15+	30	240	9.24	160

**7.5.2 PTO USE GUIDELINES FOR FULL-TIME NON-EXEMPT EMPLOYEES:**

- Employees wishing to use PTO must receive management approval in advance. Authorized PTO requires 48 hours of notice to the employee’s supervisor unless the PTO is used for legitimate, unexpected illness or emergencies. PTO may not be granted due to workload or coverage situations which are up to the discretion of the supervisor.
- PTO will be subtracted from the employee's accrued PTO bank in one-hour increments. Employees must record their PTO on their timesheets.
- Eligibility to accrue PTO is contingent on the employee either working or utilizing accrued PTO during the bi-weekly pay period.
- PTO does not accrue in pay periods during which unpaid leave, short- or long-term disability leave, or workers’ compensation leave are taken.
- Time-off that is not covered by the PTO policy, and for which separate guidelines and policies exist, include company paid holidays, bereavement time off, required jury duty, and military service leave.
- At calendar year-end (December 31), employees may not carry over more than the maximum year-end accrual amounts (Max Year-End Carry Over) listed in the table without the written approval of the President & CEO. Balances above the maximum year-end carryover amount will be erased from the employee’s PTO bank without compensation to the employee. The first Max Year-End Carry Over will go into effect on December 31, 2025.
- Bristol Adventures does not allow a negative PTO balance.
- Once accrued, unused PTO is not cashed out with the exception of a lump sum pay-out upon termination, resignation or retirement.

**7.6 SPECIAL LEAVE OF ABSENCE**

**7.6.1 LEAVE WITHOUT PAY FOR REGULAR FULL TIME AND PART TIME NON-EXEMPT EMPLOYEES:**

Again, it is the policy of Bristol Adventures that all absences from regularly scheduled work require the employee to use available PTO. Bristol Adventures recognizes, however, that in rare circumstances employees may need time off from work when they have no remaining PTO leave and no other paid leave option is applicable. Accordingly, on a case-by-case basis, the company may grant periods of unpaid leave to employees who have been employed by the company for at least one full calendar year. Leave without pay should only be sought in cases of significant or emergency need. Bristol Adventures reserves the right to decline requests for leave without pay based upon operational need.

**7.6.2 BEREAVEMENT LEAVE FOR REGULAR FULL TIME AND PART TIME NON-EXEMPT EMPLOYEES:**

A paid leave of absence may be granted to a regular full-time or part time non-exempt employee in the event of a death in the employee's family. In general, an employee wishing to take bereavement leave must communicate with his or her immediate supervisor and discuss the nature of the leave. Subject to the guidelines below, the length of the leave is dependent upon the relationship of the deceased person to the employee, whether the employee plans to attend the funeral or memorial service, the distance and travel required to attend the funeral or memorial service, and other special circumstances.

Up to five working days of paid leave time will be provided to an employee in the event of a death of an immediate family member. Immediate family members are defined as an employee's spouse, parents, stepparents, siblings, children, stepchildren, grandparent, father-in-law, mother-in-law, brother-in-law, sister-in-law, son-in-law, daughter-in-law, or grandchild.

For other family members that are not covered in the definition of immediate family, an employee may receive up to three working days of paid leave time. Exceptions may be granted based upon special circumstances. In cases where an employee requests paid leave beyond the schedule above, the extended leave must be approved by the employee's supervisor.

**7.6.3 MILITARY LEAVE**

If an employee is a member of the National Guard or has a reserve military status, Bristol Adventure will comply with required Military Leave as required by federal or state laws.

**7.6.4 JURY DUTY AND OTHER LEGAL LEAVE**

Bristol Adventures will grant employees time off work when summoned to serve for jury duty or when subpoenaed or requested by legal counsel to be a witness in court. When a full-time or part-time non-exempt employee is called for jury duty, Bristol Adventures will pay the difference between the employee's normal salary and the pay received by the employee as a juror up to a maximum of 15 days. For jury duty extending beyond 15 days, Bristol Adventures will work with the employee on a case-by-case basis to provide an arrangement consistent with applicable law.

Employees serving on jury duty must provide written proof of their service as well as documentation of any pay received in order to be eligible for this benefit.

If an employee is subpoenaed or requested by legal counsel to appear in court as a witness, Bristol Adventures will pay the employee for time spent away from his or her work. The employee must provide the subpoena or written proof of the request in order to be eligible for this paid time-off.

Employees are expected to return to work promptly whenever dismissed from jury duty or as a witness. Failure to return to work can subject the employee to disciplinary action up to and including termination.

## 8. SAFETY

Bristol Adventures is committed to maintaining a safe workplace. To further its goal, Bristol Adventure operations have safety rules and guidelines. All employees are required to comply with all issued safety rules and guidelines, as well as any applicable federal, state and local laws regarding workplace safety. Failure to follow safety rules and guidelines may result in discipline up to and including termination of employment. If you see any unsafe condition or potential hazard, such as wet floors, broken equipment or defective appliances you must report them to your supervisor immediately.

### 8.1 PERSONAL FLOTATION DEVICE

All employees operating or riding on watercraft must wear a personal floatation device at all times while the vessel is underway.

### 8.2 WILDLIFE

All employees should be aware of their surroundings and potential for wildlife encounters at all times. All employees will receive training on best practices for such encounters.

## 9. EMPLOYEE CONDUCT

### 9.1 EXPECTATIONS

Bristol Adventures operations have distinguished themselves among the finest operations of their kind in the world. Part of what makes Bristol Adventures special is the blending of our staff and its customers. Bristol Adventures employees operate from the understanding that they never get a second chance to make a good first impression. Every employee is expected to perform their duties with a high degree of professionalism and friendly demeanor. All employees are

expected to be flexible in order to best assist with whatever is needed or more importantly, being prepared for the unexpected.

## 9.2 DRESS CODE

Good personal grooming and appropriate dress are essential for maintaining a professional image internally and externally. Bristol Adventures managers may exercise reasonable discretion to determine appropriateness in employee dress and appearance, based on the specific employee activity and events. If an employee is unsure of what is appropriate, he or she should check with his or her supervisor. Employees who do not meet a professional standard may be asked to change their dress or appearance. In general, clothing must be neat, well maintained, clean in appearance and free of odor.

## 9.3 ATTENDANCE AND TARDINESS

Bristol Adventures expects all employees to assume diligent responsibility for their attendance and promptness. Employees who are going to be absent for a full or partial workday or late for work must notify their supervisor as far in advance as possible, but at least 48 hours before the start of the workday. Employees who must miss work because of emergencies or other unexpected circumstances must notify their supervisor as soon as possible.

Absences will be considered excused if the employee requested the time off in accordance with Bristol Adventures' policies on PTO, received the required approval for the absence and has sufficient accrued, but unused, PTO to cover the absence. Absences also will be considered excused if the employee requested the time off in accordance with Bristol Adventures' policy permitting a leave of absence, received the required approval for the leave and is in compliance with the leave policy.

An employee will be considered to have taken an unexcused absence if the employee is absent from work during scheduled work hours without permission, including full- or partial-day absences, late arrivals and early departures.

Bristol Adventures reserves the right to discipline employees for unexcused absences, up to and including termination of employment.

Any employee who misses three consecutive days of work without notice to his/her supervisor will be considered to have voluntarily resigned due to abandonment of job. Resignation is effective on the first business day following the third consecutive day of absence.

## 9.4 STANDARDS OF CONDUCT

Employees shall conduct themselves in a manner that reflects Bristol Adventures' core values in every decision and interaction. As such, disruptive, unproductive, unethical or illegal conduct will not be tolerated.

Violations of the employment standards listed below, this Employee Handbook or the Code may lead to corrective or disciplinary action, up to and including termination. The following is a non-exhaustive list of conduct that may violate this policy:

- Insubordination.
- Stealing or attempting to steal, or willfully damaging employer or other employee's property.
- Any type of workplace violence, including making threats, bullying or assault/battery.
- Falsifying records.
- Using offensive or profane language.
- Engaging in criminal activity.
- Tardiness and or absenteeism.
- Engaging in activity that threatens the life, health or well-being of employees or guests.
- Sale of employer property or use of company property for personal gain.
- Violating employer policies.
- Violating any federal, state or local law.

It is essential that employees maintain an atmosphere of tranquility in front of guests. Any conflicts between employees and/or third-party personnel/visitors, such as National Park Service or other operators and/or employees, should never be discussed when guests are present.

## **9.5 COMPANY PROPERTY**

Employees have responsibility for company materials, supplies and equipment. Employees are required to use diligent care and use of such materials is expected as well as your honesty in seeing that all materials are used for their intended purposes.

## **9.6 EMPLOYEE DISCIPLINE**

It may occasionally be necessary to take disciplinary action for infractions of Bristol Adventures' rules or other unacceptable conduct, such as poor job performance.

Common sense is the best guide for appropriate conduct. Employees are responsible to the company and to fellow employees to be fair and honest. It is impractical to make an all-encompassing list of rules and regulations. However, the following offenses may warrant discharge on the first occurrence:

- Possession on company property of or reporting to work under the influence of marijuana or illegal drugs.
- Reporting to work impaired or intoxicated by alcohol.
- Insubordination.
- Misrepresentation, including, but not limited to, falsification of reports, unless proved unintentional.
- Engaging in activities or business detrimental to company interests.

- Unauthorized sharing or conspiring to share confidential information.
- Fighting.
- Stealing or embezzling.
- Willfully defacing or damaging company property.
- Harassing or discriminating behavior.
- Engaging in activity that threatens the life or health of Company employees or any persons on company property.

## **10. COMMUNICATIONS, COMPUTER SYSTEM, AND NETWORK USAGE**

Bristol Adventures' communications, computer systems and network infrastructure, including telephones and fax machines ("the system") is provided only for business purposes and expects employees to use the system in compliance with federal and state laws at all times.

### **10.1 COMPUTER ACCOUNTS AND PASSWORDS**

On being given access to the system, employees are given a username and password which constitute a "computer account". Every employee is responsible for the integrity of his or her computer account and must not authorize anyone else to use this account for any reason. The unauthorized use of computer accounts and the provision of false or misleading information for the purpose of obtaining access to computing facilities are expressly prohibited.

Employees must not share their passwords with others. Passwords should never be written down, such as on labels attached to computer terminals, on calendars, or on any other materials on the desk. If unauthorized use of any computer account is detected, the employee must contact the IT Department immediately in order that the password of that computer account may be changed. Attempts to use a computer account and guess passwords are monitored by the system and notification is sent to the IT Department by the system.

All employees must log out of their computer account at the end of each workday. Accounts left logged in consume network resources unnecessarily and interfere with nightly data backup operations. In addition, computers may be re-booted overnight for various reasons; any unsaved data accessed by workstations that are not logged out or shutdown will be lost.

Employees have no expectation of privacy whatsoever related to the use of the internet or email systems and accepts that, even when internet and email materials are erased, it may be possible to recreate the information.

### **10.2 PERSONAL COMPUTER FILE STORAGE**

Each employee issued a computer has access to a "personal" area on a cloud-based server, such as an employee's Microsoft OneDrive, for saving files that only the employee may access. This

area is intended to be a storage facility for any files the employee may create that do not need to be shared with others. If there is doubt as to where to save material, employees should ask his or her supervisor. Furthermore, this area is not to be used for storing personal music or video files. Employee personal areas will be intermittently monitored by the IT Department to ensure compliance with this policy. Bristol Adventures is not responsible for reimbursement of any lost personal music or video files that may have been purchased and saved to any of our computers or network storage. Any such files may be deleted without notice.

### 10.3 COMPUTER SOFTWARE

Computers are uploaded with approved software. Under no circumstances is software to be downloaded or installed on computers without express authorization from the IT Department. Additionally, the following are not permitted to be downloaded and used on the system without express authorization from the IT Department as they may compromise network security:

- Instant Messaging programs.
- Web browser toolbars and add-ons.
- Programs for downloading and email from an employee's personal email account.

Employees are prohibited from developing or using programs that attempt to bypass system security mechanisms, capture network traffic, capture or decode passwords, break encryption protocols, replicate themselves or attach themselves to other programs, or evade software licensing or copying restrictions.

### 10.4 PROHIBITED ACTIVITIES

Employees are not permitted to use the system to:

- Hack, spread viruses, vandalize websites, launch denial of service attacks or otherwise interfere with or alter the integrity of the system;
- Tamper or give information to a party that may enable a breach of the corporate firewall protection;
- Pass any computer related information to a party that may allow the security of the network to be compromised (e.g., password, IP addresses or domain information);
- Attempt to access the computer network, or any related subscription or services under subscription or in use by Bristol Adventures after employment is terminated;
- Disclose employee or client information, or confidential proprietary business information to a non-authorized third party;
- Impersonate other individuals, damage the system, or destroy or alter data without authorization; or
- Promote, advertise or market personal matters, products or services.

Employees are also prohibited from accessing or downloading the following using the system:

- Material that is obscene, pornographic, slanderous, defamatory, harassing, vulgar, threatening, violent or offensive;
- Websites with audio or video content which is not related to business purposes; or
- Websites such as Hotmail, Yahoo or Gmail to access personal email accounts.

Employees must not create, send or forward:

- Electronic chain letters or spam; or
- Unsolicited information that contains obscene, indecent, lewd or lascivious material, other material which explicitly or implicitly refers to sexual conduct, or profane language or panders to any discriminatory basis.

### **10.5 CELL PHONES**

Employees who use their personal devices to access business email accounts must ensure it is password protected to prevent unauthorized access. The personal device must lock itself with a password or PIN if it is idle for five minutes. At the sole discretion of Bristol Adventures, an employee's personal device may be remotely wiped if the device is lost or the employee resigns or is terminated. Bristol Adventures also reserves the right to retrieve, access or search for information pursuant to an investigation or litigation. Bristol Adventures further reserves the right to disconnect devices or disable services without notification.

### **10.6 BRING YOUR OWN DEVICE (BYOD) CELL PHONE REIMBURSEMENT POLICY**

Supervisors may require certain employees to use personal cell phones for work. Employees who are required to use personal cell phones are eligible for reimbursement to cover personal service expenses. Cellular reimbursement amounts are fixed each year, and are distributed bi-weekly with payroll.

## **11. UNAUTHORIZED OR ILLEGAL CONTROLLED SUBSTANCES**

Bristol Adventures is committed to providing a safe, healthy and productive work environment. Consistent with this commitment, Bristol Adventures maintains an alcohol-free and drug-free workplace. Being under the influence of alcohol or unauthorized or illegal controlled substances (as defined by federal, state or local laws), including marijuana and Cannabidiol (CBD), poses serious health and safety risks to employees and guests, which is not tolerated.

### **11.1 PROHIBITED ACTIVITIES ON DUTY OR NOT**

Bristol Adventures expressly prohibits the following activities at any time that employees are either on duty, conducting business, or while on Bristol Adventures' premises, whether or not the employee is working:

- The use, abuse or being under the influence of illegal or unauthorized controlled substances, including marijuana and CBD.

- The possession, sale, dispensing, purchase, transfer or transit of any illegal or unauthorized controlled substance, including prescription medication that is not prescribed to the employee or drug related paraphernalia.
- The illegal use or abuse of prescription drugs.

While the use of marijuana is legal under certain circumstances under state law, it remains an illegal drug under federal law and its use is prohibited. Many products contain CBD oil that is extracted from hemp, a legal plant low in THC. Currently, such CBD products are unregulated. While CBD products may assert that they do not contain THC, some CBD products may in fact contain measurable amounts of THC. Employees using such CBD products do so at their own risk. If an employee is drug tested and results find THC, the employee is in violation of this policy.

Nothing in this policy is meant to prohibit appropriate use of over the counter medications to the extent that it does not impair an employee's job performance or safety or the safety of others.

In order to achieve the goals of this policy, Bristol Adventures reserves the right at all times to inspect employees, as well as their surroundings and possessions, for controlled substances or materials in violation of this policy. Employees should have no expectation of privacy while on Bristol Adventures' property, except in restrooms or bathing facilities.

### **11.2 PROHIBITED ACTIVITIES ON DUTY**

Bristol Adventures also expressly prohibits the use, abuse or being under the influence of alcohol at any time that employees are on duty or conducting business except during Bristol Adventures approved and sponsored social or business related events, including social gatherings, appetizer and dinner hour when employees are required to attend. This policy does not prohibit the use of alcohol at such events. However, if employees choose to consume alcohol at such events, they must do so responsibly and maintain their obligation to conduct themselves properly and professionally at all times. Employees must not consume alcohol at such events if employee has further on duty business activities that occur afterwards. Employees are always required to follow federal, state and local laws in regards to alcohol consumption.

### **11.3 SERVING AND CONSUMING ALCOHOL**

Bristol Adventures' lodge properties are licensed to serve alcohol. Therefore, all employees over 21 at those lodges must complete an approved alcohol server training program, which must be renewed every three years, regardless of whether an employee's duties specifically include serving alcohol.

The minimum drinking age in the State of Alaska is 21. Anyone under the age of 21 is expressly prohibited from consuming alcohol. Anyone under 21 is not allowed to sit at the bar or to serve alcohol. Underage consumption could lead to large fines and loss of alcohol licenses. Any person of drinking age that provides alcohol to a person under 21 is against the law and may face disciplinary action up to and including termination.

#### 11.4 PURCHASE OF ALCOHOL

Bristol Adventures prohibits the purchase of alcohol with corporate funds (or be reimbursed for such purchases) when purchased for the employee's own consumption and not for general lodge operations.

#### 11.5 DRUG TESTING

Employees working in certain safety sensitive occupations are required to be part of structured drug programs, the details of which will be outlined in that employees offer letter. Any employee who refuses to comply with Bristol Adventures' drug program testing policies or who fails to pass a required drug test will be terminated immediately.

#### 11.6 REASONABLE SUSPICION TESTING

Any employee who Bristol Adventures reasonably suspects may be affected by the use of drugs or alcohol that may adversely affect job performance, safety or the work environment may be required to submit to a drug and/or alcohol test. Reasonable suspicion testing is done to identify drug and alcohol affected employees who may pose a danger to themselves or others in their job performance.

Whenever practicable, trained supervisors will make the decision whether there is reasonable suspicion to believe an employee is impaired by or under the influence of a drug or alcohol while on duty in violation of this policy.

The decision to test must be based on a reasonable and articulable suspicion or belief that the employee is under the influence of an unauthorized drug or alcohol. Reasonable suspicion is a belief based on contemporaneous articulable observations concerning the employee's appearance, behavior, speech or body odors, or other reliable evidence or information that the employee is under the influence of or impaired by drugs or alcohol. For example, any of the following, either alone or in combination, may constitute reasonable suspicion:

- Slurred speech.
- Irregular or unusual speech patterns.
- Impaired judgment.
- Alcohol odor on breath.
- Uncoordinated walking or movement.
- Unusual or irregular behavior such as inattentiveness, listlessness, hyperactivity, hostility or aggressiveness.
- Possession of drugs or alcohol.
- Observation of drug or alcohol use prior to reporting to work or during working hours.

When a determination is made that reasonable suspicion exists that an employee is under the influence of drugs or alcohol in violation of this policy, the employee shall be immediately relieved of his or her duties, and immediately transported to an approved vendor for a drug and

alcohol screening test. Under no circumstances should an employee reasonably suspected of drug or alcohol use be allowed to transport themselves for testing, but must be transported by cab to the location and back to the work location or their home following the test. Failure to submit to a screening test is grounds for immediate termination.

## **12. ANTI-HARASSMENT AND NON-RETALIATION**

### **12.1 ANTI-HARASSMENT POLICY**

Unlawful harassment, including sexual harassment, is prohibited by law and by Bristol Adventures. Bristol Adventures is committed to providing a productive, respectful and professional environment free of verbal, physical and visual forms of harassment. It is a violation of this Employee Handbook for an employee to engage in any of the behavior defined below, and such misconduct will subject an employee to disciplinary action up to and including immediate termination.

Employees who feel they have been harassed, sexually or on any other discriminatory basis, should immediately report such incidents following the procedure described below, without fear of reprisal. Confidentiality will be maintained to the extent permitted by the circumstances.

#### **12.1.1 DEFINITION OF HARASSMENT**

Any verbal, physical or visual conduct involving race, color, religion, age, gender, sexual orientation, national origin, mental or physical disability, marital status, veteran status, or other protected discriminatory basis that impairs an employee's ability to perform his or her job.

#### **12.1.2 DEFINITION OF SEXUAL HARASSMENT**

Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when this conduct explicitly or implicitly affects an individual's employment, unreasonably interferes with an individual's work performance, or creates an intimidating, hostile, or offensive work environment. Sexual harassment can occur in a variety of circumstances, including but not limited to the following:

- Unwelcome requests for dates or propositions for sexual favors.
- The victim can be a woman or a man, does not have to be of the opposite sex as the harasser, and can include anyone affected by the offensive conduct.
- The harasser can be a supervisor, an agent of the employer, a co-worker, or a non-employee, vendor, contractor, etc.

#### **12.1.3 PROCEDURE**

Bristol Adventures is committed to taking reasonable steps to prevent harassment from occurring and will take immediate and appropriate action upon knowledge that unlawful harassment has occurred.

If you believe you or another employee has been a victim of harassment, you should first consider making your feelings known to the offending party. You may also initiate a complaint by reporting any offending behavior to your supervisor, the Compliance Department, the Human Resources Department or via the Ethics Hotline.

Officers and supervisors who know of or receive reports or complaints of offending behavior must promptly take immediate and appropriate action, including notification to the Compliance Department and Human Resources Department.

#### **12.1.4 INVESTIGATION**

Bristol Adventures recognizes that unwanted social interaction or harassment must be determined on a case-by-case basis. Therefore, Bristol Adventures will promptly and thoroughly investigate all claims of harassment. Complaints will be handled with sensitivity, discretion and confidentiality to the extent allowed by the circumstances and the law. Generally, this means that allegations of discrimination or harassment are shared with individuals necessary so that Bristol Adventures can conduct an effective investigation.

The complaining employee is usually requested to provide as many details as possible, such as date(s), location(s), names of witness(es), or information about the alleged harasser(s). Persons with relevant information will be interviewed. During the investigation, steps may be taken, when appropriate, to minimize contact between the complaining employee and the alleged harasser, such as schedule changes, temporary transfers or investigatory leave, usually for the alleged harasser.

#### **12.1.5 FINDINGS**

After the investigation is complete, Bristol Adventures will share its findings, as appropriate, with the complaining employee, the alleged harasser and with other employees directly concerned with the incident.

If Bristol Adventures concludes that unlawful harassment occurred, prompt and effective remedial action will be taken. This may include discipline of the harasser and other actions to remedy the effects of the harassment and prevent further harassment.

#### **12.1.6 SPEAK UP, SPEAK OUT**

Bristol Adventures is committed to ethical behavior, integrity, honesty and compliance with the law. Bristol Adventures expects ethical and honorable behavior of those who work for us and those we work with – business partners, vendors and clients. Employees who speak up to protect Bristol Adventures will be protected in return. Bristol Adventures strictly prohibits any acts of reprisal or retaliation against any employee who in good faith reports an allegation of harassment or other discrimination or who in good faith participates in any investigation of such report.

Any person who violates this non-retaliation policy will be subject to discipline, up to and including termination.

Given the sensitive nature of this type of allegation, Bristol Adventures also recognizes that false or malicious accusations of harassment can have a serious effect on innocent individuals. Therefore, if the investigation reveals that the accusation was contrived and without merit or with malicious intent, disciplinary action may be taken against the individual who wrongly filed the complaint.

## 13. EMPLOYEE RESOURCES

### 13.1 COMPLAINT PROCEDURE

Bristol Adventures is committed to creating and maintaining a work environment where all employees feel comfortable in airing any issues or concerns that they may have with respect to their employment without fear of retaliation. In the event that you have any such concerns or issues, it is suggested that you follow the following procedures:

1. If you feel comfortable speaking to your supervisor about the issue, go to your supervisor and try to resolve the issue informally.
2. If this is not possible, consider discussing the issue with the President & CEO. If the issue concerns your President & CEO or you do not feel safe or comfortable speaking with the President & CEO – go speak to the Compliance Department or Human Resources Department.
3. Your supervisor, the President & CEO, the Compliance Department or the Human Resources Department will respond to your issue as soon as it is reasonably practicable to do so.

### 13.2 REPORT VIOLATIONS OF THE CODE

The BBNC Code of Ethics and Business Conduct (Code) is designed to protect Bristol Adventures, all employees and our clients. Thus, Bristol Adventures expects all employees to report a suspected violation of the Code, or any other law, rule or applicable regulation, to their supervisor, the Human Resources Department, the Compliance Department or via the BBNC Ethics Hotline. A copy of the Code is available on BBNC's website at [www.bbnc.net/about/code-of-ethics](http://www.bbnc.net/about/code-of-ethics) or by contacting your Compliance Department representative or Human Resources representative.

All reports of potential violations of the Code will be investigated promptly, with due respect for the rights, and to the extent possible, privacy of all who may be involved in such an investigation.

Persons reporting potential violations should be aware that the need to investigate and correct any impropriety may require disclosure of the matter reported to a restricted group.

You will not get into trouble for asking questions or for reporting suspected problems. There will be no retaliation against any person who reports what they believe in good faith to be a violation

of the Code or of any law, rule, or regulation applicable to our business. Use your own good judgment and common sense. Employees who are found to have made an allegation of misconduct in bad faith allegations may be subject to discipline up to and including termination of employment.

### 13.3 ETHICS REPORTING HOTLINE

BBNC maintains Ethical Advocate, a secure third-party ethics reporting hotline and website to which employees can report any suspected violations of the laws, regulations and compliance requirements of the Code. Ethical Advocate provides a confidential, anonymous method of reporting and is available to employees, vendors and clients 24/7 for reporting.

**Ethical Advocate Hotline:** 1-866-513-7078

**Ethical Advocate Website:** <http://bbnc.ethicaladvocate.com>

### 13.4 FILING A REPORT

If you file an Ethical Advocate Report, you will be prompted to create a secure login managed by Ethical Advocate. The site does not have the ability to retrieve your username and password. The login allows you to sign back in to receive communications on the matter. We will post an acknowledgment that BBNC has received the complaint, and the matter is immediately assigned to be investigated and facts gathered. Once the investigation is complete, a communication will be posted that the complaint was either substantiated or not.

BBNC cannot share the results of the investigation or corrective action involving an individual. However, we will share information to the extent possible with the reporting party.

**BRISTOL ADVENTURES EMPLOYEE HANDBOOK**

I certify that I have received, read, and understand the Bristol Adventures Employee Handbook effective December 23, 2024.

I also understand that the statements contained in the Employee Handbook are not a contract and that my employment with Bristol Adventures is at-will unless otherwise agreed to in writing by the President & CEO.

I understand that the Employee Handbook and its policies, practices, and procedures may be changed by Bristol Adventures at any time, and that any prior Employee Handbooks issued by Bristol adventures are no longer in effect.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Print Name