



Pinnacle Health Management LLP

Employee Handbook

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Introduction

Welcome Message

Dear Valued Employee,

Welcome to Pinnacle Health Management LLP! We are pleased with your decision to join our team.

Pinnacle Health Management LLP is committed to providing superior quality and unparalleled customer service in all aspects of our business. We believe each employee contributes to the success and growth of our company.

This employee handbook contains general information on our policies, practices, and benefits. Please read it carefully. If you have questions regarding the handbook, please discuss them with me.

Welcome aboard. We look forward to working with you!

Sincerely,

Gary Phillips
Managing Partner

Mission

Pinnacle Health Management is the mental health care provider of choice in Southeastern Massachusetts. We specialize in the treatment of psychiatric illness and behavioral health disorders in the elderly, providing the highest quality diagnostic and treatment services.

Pinnacle Health Management outperforms other providers because of our dedicated multidisciplinary team of knowledgeable and experienced clinicians; including Clinical Nurse Specialists, Nurse Practitioners, Psychologists and Licensed Clinical Social Workers. Our team works in collaboration with Dr. Bayog, and each other, to assure each patient realizes the best possible clinical outcome.

Our commitment is to excellence in all aspects of our services. This is accomplished through the application of best practices; the use of current science and technology; and most importantly – the delivery of exceptional care and compassion for each patient and their caregivers.

Pinnacle Health Management is proven in reliability, diligence and a client–focused approach. We excel at meeting the demands of the licensing and regulatory authorities that govern long-term care.

Company Goals, Values, and Beliefs

Pinnacle Health Management, LLP is committed to providing the highest quality behavioral health care to residents of nursing and assisted living facilities. Care is provided through an interdisciplinary team approach to ensure that services are comprehensive, coordinated and appropriate for each resident referred to PMH for behavioral health services.

As consultants to the home staff, PHM clinicians endeavor to enhance each resident's care by providing psycho-pharmacological assessment and management, individual and family therapy, and continuous support of the educational development of staff. Our goal at Pinnacle Health Management LLP is simple: provide extraordinary clinical quality and customer service. We accomplish this by observing a common set of values and by partnering with organizations that have the finest reputation for quality. There are no shortcuts; we believe that our goals are accomplished only with a real commitment from every employee.

Our values and beliefs require that we:

- Treat employees and colleagues with respect; Pinnacle Health Management LLP does not tolerate discrimination of any kind.
- Encourage all employees in creative problem solving.
- Provide consistent leadership and competent on-the-job training.
- Maintain an open-door policy that encourages interaction and discussion; encourage ideas to improve the workplace and increase productivity.
- Provide effective and efficient corrective action to resolve customer service issues and ensure complete customer satisfaction.
- Deliver competitive, outstanding service to our customers and partner with vendors who share that goal.
- Make "Do It Right the First Time" our team attitude to ensure continued growth and prosperity.

The Purpose of This Handbook

This handbook has been prepared to introduce employees to Pinnacle Health Management. It will acquaint you with many of the policies, procedures and benefits that apply to your employment at Pinnacle. The information contained in this handbook applies to all employees of Pinnacle.

The policies and benefits addressed in this handbook supersede any and all past personnel practices and procedures, whether written or oral. The Company reserves the right to amend, to modify, to supplement or to revise provisions described in this handbook without notice whenever the Company determines that such an action is appropriate. Any such action will apply to existing, as well as future employees.

Professional employees employed by Pinnacle Health Management will be presented with a Participating Clinician's Agreement which further delineates the responsibilities and commitments of the respective parties to the Agreement.

Although every effort has been made to ensure this handbook is accurate and up to date, if any discrepancies do exist between it and the Company's formal contracts/agreements, the actual provision of each benefit plan shall govern.

The information contained in this handbook is confidential and is provided for the reference of employees. This handbook is the property of the Company. The employee should direct any questions to the Managing Partner.

Disclaimer

The policies included in this handbook are not intended to be, and do not constitute, a contract or part of a contractual agreement between the Company and any employee. Rather, this handbook is intended solely to provide you with guidance about the working conditions here.

While the Company hires individuals with the hope that the employment relationship will be long and mutually satisfying, employment at the Company is not guaranteed for any specified period of time. Employment with the Company is at-will, and the Company will not modify its policy of at-will employment in any case.

Accordingly, either you or the Company can terminate the employment relationship, with or without cause, and with or without notice, regardless of the date of payment of your wage or salary.

Changes in Policy

Company change is inevitable. Therefore, we expressly reserve the right to interpret, modify, suspend, cancel, or dispute, with or without notice, all or any part of our policies, procedures, and benefits at any time with or without prior notice. Changes will be effective on the dates determined by Pinnacle Health Management LLP, and after those dates all superseded policies will be null and void.

No individual or manager has the authority to alter the foregoing. Any employee who is unclear on any policy or procedure should consult with the Managing Partner.

General Employment

Nature of Employment

Employment with Pinnacle Health Management LLP is "at-will". This means employees are free to resign at any time, with or without cause, and Pinnacle Health Management LLP may terminate the employment relationship at any time, with or without cause or advance notice. As an at will-employee, it is not guaranteed, in any manner, that you will be employed with Pinnacle Health Management LLP for any set period of time.

The policies set forth in this employee handbook are the policies that are in effect at the time of publication. They may be amended, modified, or terminated at any time by Pinnacle Health Management LLP, except for the policy on at-will employment, which may be modified only by a signed, written agreement between the Managing Partner and the employee at issue. Nothing in this handbook may be construed as creating a promise of future benefits or a binding contract between Pinnacle Health Management LLP and any of its employees.

Immigration Law Compliance

Pinnacle Health Management LLP is committed to employing only United States citizens and aliens who are authorized to work in the United States.

In compliance with the Immigration Reform and Control Act of 1986, as amended, each new employee, as a condition of employment, must complete the Employment Eligibility Verification Form I-9 and present documentation establishing identity and employment eligibility. Former employees who are rehired must also complete the form if they have not completed an I-9 with Pinnacle Health Management LLP within the past three years, or if their previous I-9 is no longer retained or valid.

Equal Employment Opportunity

Pinnacle Health Management LLP is an Equal Opportunity Employer. Employment opportunities at Pinnacle Health Management LLP are based upon one's qualifications and capabilities to perform the essential functions of a particular job and free from discrimination because of race, religion, sex, national origin, age, veteran status, disability, genetic information, or any other characteristic protected by law.

This Equal Employment Opportunity policy governs all aspects of employment, including, but not limited to, selection, job assignment, compensation, discipline, termination, and access to benefits and training.

Pinnacle Health Management LLP strongly urges the reporting of all instances of discrimination and prohibits retaliation against any individual who reports discrimination or participates in an investigation

of such report. Appropriate disciplinary action, up to and including immediate termination, will be taken against any employee who violates this policy.

Confidentiality

Pinnacle Health Management LLP takes the protection of trade secrets and confidential business information very seriously. Confidential business information includes, but is not limited to, the following examples: policies, procedures, guidelines, forms, agreements.

All employees must maintain trade secrets and other confidential business information in strict confidence. Employees found to be in violation of this policy will be subject to disciplinary action, up to and including termination of employment.

Employee Grievances

It is the policy of Pinnacle Health Management LLP to maintain a harmonious workplace environment. Pinnacle Health Management LLP encourages its employees to express concerns about work-related issues, including workplace communication, interpersonal conflict, and other working conditions.

Employees are encouraged to raise concerns with the Managing Partner. If not resolved at this level, an employee may submit, in writing, a signed grievance to the Managing Partner.

After receiving a written grievance, Pinnacle Health Management LLP may hold a meeting with the employee and any other individuals who may assist in the investigation or resolution of the issue. All discussions related to the grievance will be limited to those involved with, and who can assist with, resolving the issue.

Complaints involving alleged discriminatory practices shall be processed in accordance with the Pinnacle Health Management LLP's Sexual and other Unlawful Harassment Policy.

Pinnacle Health Management LLP assures that all employees filing a grievance or complaint can do so without fear of retaliation or reprisal.

Security

The purpose of Pinnacle Health Management LLP's security policy is to protect company assets and to maintain a safe working environment for all employees.

Facility Access:

Pinnacle Health Management LLP office personnel may be issued a key to gain access to Pinnacle Health Management LLP offices. Employees who are issued keys are responsible for their safekeeping. All lost or stolen keys must be reported to the Managing Partner as soon as possible.

Upon separation from Pinnacle Health Management LLP, and at any other time upon Pinnacle Health

Management LLP's request, all keys must be returned to the Managing Partner.

Closing Procedures:

The last employee, or a designated employee, who leaves the office at the end of the business day assumes the responsibility to ensure that: all doors are securely locked; the alarm system is armed; thermostats are set on appropriate evening and/or weekend setting; and all appliances and lights are turned off with exception of the lights normally left on for security purposes.

Internal and External Communication

Effective and ongoing communication within Pinnacle Health Management LLP and with its customers is essential. As such, the company maintains systems through which important information can be shared among employees, management, sub-contractors and customers.

Employees may correspond and send files via e-mail. All employees are responsible for checking internal communications on a frequent and regular basis.

Use of email messaging containing confidential information, including information governed by HIPAA regulations, must be exchanged using encryption technology. This technology is available through the use of Microsoft Outlook.

Employees should consult with the Managing Partner with any questions or concerns on information disseminated. For more information on the appropriate usage of e-mail in the workplace, employees may refer to the Internet Usage and Computer Usage policies.

Meetings

Quarterly meetings are sponsored by Pinnacle Health Management and attendance is strongly encouraged. While meeting time is non-compensatory, the Company hosts each event and underwrites the cost of meals and beverages. The core agenda of each meeting includes:

- Unfinished business
- New Business
 - Business development
 - Policy changes
 - CMS updates/initiatives
 - Other
- Grand rounds

Clinicians working under the terms of a Collaborative Agreement must make every effort to attend and participate in each quarterly meeting to demonstrate fulfillment of each party's responsibility under the terms of said Agreement. Repeated and unexcused absences from the quarterly meeting may result in dissolution of the Collaborative Agreement.

Whistleblower Protection

This policy is designed to protect employees and address Pinnacle Health Management LLP commitment to integrity and ethical behavior. In accordance with Whistleblower Protection regulations, Pinnacle Health Management LLP will not tolerate harassment, retaliation, or any type of discrimination against an employee who:

- Makes a good faith complaint regarding suspected Company or employee violations of the law
- Makes a good faith complaint regarding accounting, internal accounting controls, or auditing matters that may lead to incorrect, or misrepresentations in, financial accounting
- Provides information to assist in an investigation regarding violations of the law; or
- Files, testifies, or participates in a proceeding in relation to alleged violations of the law.

Negative employment sanctions, such as demotion or termination, as a result of an employee's decision to provide good-faith information regarding violations of the law, will not be tolerated. In addition, discrimination, threats, and harassment is prohibited.

Employment Status and Record Keeping

Employment Classifications

For purposes of salary administration and eligibility for overtime payments and employee benefits, Pinnacle Health Management LLP classifies employees as either exempt or non-exempt. Non-exempt employees are entitled to overtime pay in accordance with federal and state overtime provisions. Exempt employees are exempt from federal and state overtime laws and include those working on a fee-for-service and fee-for-clinical hour Agreement. Non-exempt employees must obtain prior approval from the Managing Partner before engaging in work hours that would constitute overtime.

If you change positions during your employment with Pinnacle Health Management LLP or if your job responsibilities change, you will be informed by the Managing Partner of any change in your exempt status.

In addition to your designation of either exempt or non-exempt, you also belong to one of the following employment categories:

Full-Time:

Full-time employees are regularly scheduled to work greater or equal to 32 hours per week. Generally, regular full-time employees are eligible for Pinnacle Health Management LLP's benefits, subject to the terms, conditions, and limitations of each benefit program.

Regular Part-Time:

Part-time employees are regularly scheduled to work less than 32¹ hours per week. Regular part-time employees may be eligible for certain Pinnacle Health Management LLP benefit programs, subject to the terms, conditions, and limitations of each benefit program. Employees working less than thirty (32) hours per week are not eligible for company sponsored benefits.

Temporary:

Temporary employees include those hired for a limited time to assist in a specific function or in the completion of a specific project. Employment beyond any initially stated period does not in any way imply a change in employment status or classification. Temporary employees retain temporary status unless and until they are notified, by Pinnacle Health Management LLP Management, of a change. They are not eligible for any of Pinnacle Health Management LLP's benefit programs.

“W2” Subcontractors

“W2” Subcontractors are employed for a limited, specific period or for a specific project. “W2” Subcontractors may work on a full-time or part-time schedule and are not eligible to receive company benefits.

Personnel Data Changes

It is the responsibility of each employee to promptly notify the Managing Partner of any changes in personnel data. Such changes may affect your eligibility for benefits, the amount you pay for benefit premiums, and your receipt of important company information.

If any of the following have changed or will change in the coming future, the employee is required to notify the Managing Partner as soon as possible, and, as indicated*, provide a copy of the renewed document:

- Legal name
- Mailing address
- Telephone number(s)
- Exemptions on your tax forms
- Emergency contact(s)
- Training certificates
- Professional licenses*
- DEA/CSR*
- Professional Liability Insurance*

¹ Benefited employee's hired prior to the effective date of this publication whose Agreement stipulates a 24 hour threshold for benefits will be grandfathered.

Expense Reimbursement

Expenses incurred by an employee must be approved in advance by the Managing Partner.

Some expenses that may warrant reimbursement include, but are not limited, to the following: office supplies including, printer ink, toner, and computer hardware and software.

Employees must submit expense reports to the Managing Partner for approval. Questions regarding this policy should be directed to the Managing Partner.

Personnel File Accessibility

Employee files are confidential and are to be treated as such. Access to employee personnel files must be authorized. Access will be limited to the Managing Partner and office staff as they need access in the course of their duties.

An employee may inspect his or her own file provided a request is made to the Managing Partner in advance.

Termination of Employment

Termination of employment is an inevitable part of personnel activity within any organization, and many of the reasons for termination are routine. Common circumstances under which employment is terminated include the following:

- **Resignation** - Voluntary employment termination initiated by an employee.
- **Termination** - Involuntary employment termination initiated by Pinnacle Health Management LLP. In most cases, Pinnacle Health Management LLP will use progressive disciplinary actions before dismissing an employee. However, certain actions may warrant immediate termination.
- **Layoff** - Involuntary employment termination initiated by Pinnacle Health Management LLP for non-disciplinary reasons.
- **Retirement** - Voluntary employee termination upon eligibility for retirement.

Nonexempt employees, who intend to terminate employment with Pinnacle Health Management LLP, shall provide Pinnacle Health Management LLP with at least 14 days written notice. Exempt employees shall provide at least 30 days written notice. Such notice is intended to allow the company time to adjust to the employee's departure without placing undue burden on those employees who may be required to fill in before a replacement can be found and provide for continuity of care to our customers.

Since employment with Pinnacle Health Management LLP is based on mutual consent, both the employee and Pinnacle Health Management LLP have the right to terminate employment at will, with or without cause, during and after the introductory period.

In the case of employee termination, the employee will receive their accrued pay in accordance with all federal, state and local laws.

Any employee who terminates employment with Pinnacle Health Management LLP shall return all files, records, keys, and any other materials that are property of Pinnacle Health Management LLP.

Employee benefits will be affected by employment termination in the following manner:

- All accrued vested benefits that are due and payable at termination will be paid in accordance with applicable federal, state and local laws.
- Some benefits may be continued at the employee's expense, if the employee elects to do so, such as healthcare coverage.
- The employee will be notified of the benefits that may be continued and of the terms, conditions, and limitations of such continuation.

If you have any questions or concerns regarding this policy, direct them to the Managing Partner.

Employment Verification

Pinnacle will only verify employment information given by the employee to the company making the inquiry. This includes position, dates of hire and termination (if applicable).

Working Conditions and Hours

Workplace Safety

Pinnacle Health Management LLP is committed to providing a clean, safe, and healthful work environment for its employees. Maintaining a safe work environment, however, requires the continuous cooperation of all employees. Pinnacle Health Management LLP and all employees must comply with all occupational safety and health standards and regulations established by the Occupational Safety and Health Act and state and local regulations. In addition, all employees are expected to obey safety rules and exercise caution and common sense in all work activities.

Employees must immediately report any unsafe conditions to the Managing Partner. Employees who violate safety standards; cause hazardous or dangerous situations; or fail to report or, where appropriate, remedy such situations may be subject to disciplinary action, up to and including termination of employment.

In the case of an accident that results in injury, regardless of how seemingly insignificant the injury may appear, employees must notify the Managing Partner.

Company Hours

Pinnacle Health Management LLP is open for business from Monday through Friday 8:00 am to 6:00 pm; except for holidays recognized by Pinnacle Health Management LLP. The standard workweek is 40 hours.

Exempt employees exercise significant discretion in their work schedule. It is incumbent on each employee to coordinate his/her schedule with the routine of the long term care or assisted living facility where they provide services. Business needs may necessitate a variation in your starting and ending times as well as in the total hours you may be scheduled to work each day and each week. While flexibility in scheduling is provided, it is the employee's responsibility to notify the liaison at the home and the Managing Partner when a need arises that requires alteration of a previously established schedule.

Use of Company Property

Company property refers to anything owned by the Company: physical, electronic, intellectual, or otherwise. The use of company property is for business purposes only.

When materials or equipment are assigned to an employee for Company business, it is the employee's responsibility to see that the equipment is used properly and cared for properly. However, at all times, equipment assigned to the employee remains the property of the Company, and is subject to reassignment and/or use by the Company without prior notice or approval of the employee. This includes, but is not limited to; computer equipment and data stored thereon, voice mail, records and employee files.

Pinnacle Health Management has created specific guidelines regarding the use of company equipment. Below is a list of employee responsibilities and limitations in regards to company property.

Company Equipment:

All necessary equipment are furnished to employees in order to assist them in their required duties. Each employee is, in turn, responsible for this equipment. Equipment damaged or stolen as a result of an employee's negligence will, to the extent permitted by federal, state and local law, be charged to the employee.

Smoking

Pinnacle Health Management LLP provides a smoke-free environment for its employees, customers, and visitors. Smoking is prohibited throughout the workplace. We have adopted this policy because we have a sincere interest in the health of our employees and in maintaining pleasant working conditions.

Meal & Rest Periods

In accordance with state and local laws, non-exempt employees will be provided with meal and rest periods. Break periods of less than 20 minutes will be paid. Break periods lasting longer than 20 minutes will be unpaid.

Non-exempt employees must be fully relieved of their job responsibilities and are not permitted to work during unpaid break and meal periods of more than 20 minutes. If for any reason a non-exempt

employee does not take the applicable meal and rest period that they are provided, the employee must notify his or her Managing Partner immediately.

Employee Conduct

Standards of Conduct

Pinnacle Health Management LLP's rules and standards of conduct are essential to our productive work environment. All employees must familiarize themselves with company rules and standards; all employees will be held to them. Any employee who disregards or deviates from company rules or standards may be subject to disciplinary action, up to and including termination of employment.

While not intended to be an all-inclusive list, the examples below represent behavior that is considered unacceptable in the workplace. Behaviors such as these, as well as other forms of misconduct, may result in disciplinary action, up to and including termination of employment:

- Falsification of timekeeping records
- Violation of safety or health rules
- Unauthorized use of computers, or other company-owned equipment
- Unauthorized disclosure of any confidential information

Other forms of misconduct not listed above may also result in disciplinary action, up to and including termination of employment. If you have questions regarding Pinnacle Health Management LLP's standards of conduct, please direct them to the Managing Partner.

Disciplinary Action

Disciplinary action at Pinnacle Health Management LLP is intended to fairly and impartially correct behavior and performance problems early on and to prevent reoccurrence.

Disciplinary action may involve any of the following: verbal warning, written warning, suspension with or without pay, and termination of employment, depending on the severity of the problem and the frequency of occurrence. Pinnacle Health Management LLP reserves the right to administer disciplinary action at its discretion and based upon the circumstances.

Pinnacle Health Management LLP recognizes that certain types of employee behavior are serious enough to justify termination of employment, without observing other disciplinary action first.

Attendance and Punctuality

Absenteeism and tardiness place an undue burden on other employees and on the company as a whole. Pinnacle Health Management LLP expects that every employee will be regular and punctual in attendance. This means being ready to work at your scheduled start time each day. Employees are also expected to return from scheduled breaks and meal periods on time.

All time off must be requested in writing, in advance, as outlined in the Pinnacle Health Management LLP Paid Time Off (PTO) policy. If you are unexpectedly unable to report for work for any reason, or if you will be late for any reason, you must notify the Managing Partner as early as possible, but always prior to your scheduled starting time. Employees must make every effort to speak with the Managing Partner directly. It is acceptable to leave a voicemail message or to text the Managing Partner.

Employees who are going to be absent for more than one day should contact the Managing Partner each day.

Pinnacle Health Management LLP considers consistent attendance and punctuality to be the foundation for excellent performance. Should undue or recurrent absence and tardiness become apparent, the employee may be subject to disciplinary action, up to and including termination of employment.

Weather Related Absence

Pinnacle never condones unsafe travel by its employees. At the same time, regular attendance is a key element of the Company's health, and lost time must be minimized. *The responsibility for minimizing lost time belongs to each employee.* Do not expose yourself to unnecessary risk, but instead, think ahead.

Weather forecasts are usually accurate regarding significant events. If commuting is an undue risk at normal commuting hours, use a different schedule on the day of a storm. If possible, work a little extra the day before or after a storm.

Remember, your contributions are important, and efficiency matters.

Computer, Email & Internet Usage

Pinnacle Health Management LLP's computer systems allow us to be more productive. Computer, e-mail, and internet are tools that create great value, but can cause problems if used improperly. It is extremely important that all employees use good business judgment when using the computer systems.

Computer hardware, software, electronic mail, internet connections, and all other computer or electronic communication or data storage systems used by Pinnacle Health Management LLP are the property of Pinnacle Health Management LLP and are intended for business use. Employees have no right of personal privacy in their use of Pinnacle Health Management LLP's computer and electronic communication systems. To ensure compliance with this policy, computer, email and internet usage may be monitored, including but not limited to, reviewing documents created and stored on Pinnacle Health Management LLP's computer and electronic communication systems, monitoring sites visited by employees on the internet, reviewing materials downloaded or uploaded by employees from or to the internet, and reviewing emails sent and received by employees.

Pinnacle Health Management LLP strives to maintain a workplace free of harassment and sensitive to the diversity of its employees. Therefore, Pinnacle Health Management LLP prohibits the use of computers and the email system in ways that are disruptive, offensive to others, or harmful to morale.

Computer, email and internet may not be used to solicit others for commercial ventures, religious or political causes, outside organizations, or other nonbusiness matters.

Pinnacle Health Management LLP purchases and licenses the use of various computer software for business purposes and does not own the copyright to this software or its related documentation. Unless authorized by the software developer, Pinnacle Health Management LLP does not have the right to reproduce such software for use on more than one computer. Employees may only use software according to the software license agreement. Pinnacle Health Management LLP prohibits the illegal duplication of software and its related documentation.

The unauthorized use, installation, copying, or distribution of copyrighted, trademarked, or patented material on the Internet is expressly prohibited. As a general rule, if an employee did not create material, does not own the rights to it, or has not gotten authorization for its use, it should not be put on the Internet. Employees are also responsible for ensuring that the person sending any material over the Internet has the appropriate distribution rights.

Abuse of this policy may result in disciplinary action, up to and including termination of employment. The following behaviors are examples of previously stated or additional actions and activities that are prohibited and can result in disciplinary action:

- Sending or posting discriminatory, harassing, or threatening messages or images
- Stealing, using, or disclosing someone else's code or password without authorization
- Copying, pirating, or downloading software and electronic files without permission
- Sending or posting confidential material, trade secrets, or proprietary information outside of the organization
- Violating copyright law
- Failing to observe licensing agreements
- Engaging in unauthorized transactions that may incur a cost to the organization or initiate unwanted Internet services and transmissions
- Sending or posting messages or material that could damage the organization's image or reputation
- Participating in the viewing or exchange of pornography or obscene materials
- Sending or posting messages that defame or slander other individuals
- Attempting to break into the computer system of another organization or person
- Refusing to cooperate with a security investigation
- Sending or posting chain letters, solicitations, or advertisements not related to business purposes or activities
- Using the Internet for political causes or activities, religious activities, or any sort of gambling
- Sending or posting messages that disparage another organization's products or services
- Passing off personal views as representing those of the organization
- Engaging in any other illegal activities

Employees should notify the Managing Partner or any member of management upon learning of violations of this policy.

Company Supplies

Only authorized persons may purchase supplies in the name of Pinnacle Health Management, LLP. No employee whose regular duties do not include purchasing shall incur any expense on behalf of Pinnacle Health Management LLP or bind Pinnacle Health Management LLP by any promise or representation without prior approval.

Personal Appearance

Pinnacle is a professional company. Therefore, we expect that all employees will present themselves accordingly. While we have no formal dress code, the personal appearance of employees should be appropriate for the work environment. Employee attire should be neat, clean and well maintained. Employees should avoid attire that would detract from the Company's professional image or will interfere with their ability to perform their job responsibilities.

Client dress codes take precedence unless lower than our standard. Our policy should be considered the minimum. The objective is to maintain the highest standards without being out of place.

It is never appropriate to wear stained, wrinkled, frayed, or revealing clothing to the workplace. Employees are urged to use their discretion when determining what is appropriate to wear to work.

Sexual and Other Unlawful Harassment

Pinnacle Health Management LLP is committed to a work environment in which all individuals are treated with respect. Pinnacle Health Management LLP expressly prohibits discrimination and all forms of employee harassment based on race, color, religion, sex, national origin, age, disability, military or veteran status, or status in any group protected by state or local law.

Sexual harassment is a form of discrimination and is prohibited by law. For purposes of this policy sexual harassment is defined as 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. Unwelcome sexual advances (either verbal or physical), requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when: (1) submission to such conduct is made either explicitly or implicitly a term or condition of employment; (2) submission or rejection of the conduct is used as a basis for making employment decisions; or, (3) the conduct has the purpose or effect of interfering with work performance or creating an intimidating, hostile, or offensive work environment.

Sexual harassment may include a range of behaviors and may involve individuals of the same or different gender. These behaviors include, but are not limited to:

- Unwanted sexual advances or requests for sexual favors.
- Sexual or derogatory jokes, comments, or innuendo
- Unwelcomed physical interaction

- Insulting or obscene comments or gestures
- Offensive email, voicemail, or text messages
- Suggestive or sexually explicit posters, calendars, photographs, graffiti, or cartoons
- Making or threatening reprisals after a negative response to sexual advances.
- Visual conduct that includes leering, making sexual gestures, or displaying of sexually suggestive objects or pictures, cartoons or posters.
- Verbal sexual advances or propositions.
- Physical conduct that includes touching, assaulting, or impeding or blocking movements
- Any other visual, verbal, or physical conduct or behavior deemed inappropriate by the company

Harassment on the basis of any other protected characteristic is also strictly prohibited.

Complaint Procedure:

Pinnacle Health Management LLP strongly encourages the reporting of all instances of discrimination, harassment, or retaliation. If you believe you have experienced or witnessed harassment or discrimination based on sex, race, national origin, disability, or another factor, promptly report the incident to the Managing Partner.

Any reported allegations of harassment or discrimination will be investigated promptly, thoroughly, and impartially.

Any employee found to be engaged in any form of sexual or other unlawful harassment may be subject to disciplinary action, up to and including termination of employment.

Retaliation Prohibited:

Pinnacle Health Management LLP expressly prohibits retaliation against any individual who reports discrimination or harassment, or assists in investigating such charges. Any form of retaliation is considered a direct violation of this policy and, like discrimination or harassment itself, will be subject to disciplinary action, up to and including termination of employment.

Drug and Alcohol Abuse

Pinnacle Health Management LLP is committed to maintaining a workplace free of substance abuse. No employee is allowed to consume, possess, sell, purchase, or be under the influence of alcohol or illegal drugs on any property owned by or leased on behalf of Pinnacle Health Management LLP, or in any vehicle owned or leased on behalf of Pinnacle Health Management LLP. The use of over-the-counter drugs and legally prescribed drugs is permitted as long as they are used in the manner for which they were prescribed and provided that such use does not hinder an employee's ability to safely perform his or her job. Pinnacle Health Management LLP will not tolerate employees who report for duty while impaired by the use of alcohol or drugs. All employees should report evidence of alcohol or drug abuse to the Managing Partner immediately. In cases in which the use of alcohol or drugs creates an imminent threat to the safety of persons or property, employees are required by Pinnacle Health Management LLP to report the violation. Failure to do so may result in disciplinary action, up to and including termination

of employment.

Workplace Violence

Pinnacle Health Management LLP strictly prohibits workplace violence, including any act of intimidation, threat, harassment, physical violence, verbal abuse, aggression or coercion against a coworker, vendor, customer, or visitor.

Prohibited actions, include, but are not limited to the following examples:

- Physically injuring another person
- Threatening to injure another person
- Engaging in behavior that subjects another person to emotional distress
- Threatening to use or using a weapon while on company premises, on company-related business, or during job-related functions
- Intentionally damaging property

All threats or acts of violence should be reported immediately to the Managing Partner. Employees found to have engaged in violence may be subject to immediate termination.

Employee Benefits

Paid Time Off (PTO)

Paid Time Off (PTO) is an all-purpose time off policy for eligible employees to use for vacation, holiday, illness, injury, or personal business. PTO combines traditional vacation and sick leave plans into one flexible, inclusive policy. PTO is payable in the same manner as the regular salary and is subject to the same withholding elections.

Full-time employees are eligible to earn and use PTO as described in this policy.

Upon entering an eligible employment classification, employees will begin to earn PTO on a pro-rated basis of 15 days per year. Accrued PTO time can be taken upon completion of six (6) months of continuous employment or sooner upon request and approval of the Managing Partner.

To the extent permitted by state and local laws, employees must use their earned time prior to December 31 of the calendar year; otherwise the time will be forfeited. Unused PTO can be carried over to a subsequent year, subject to a maximum of 40 hours. Paid time off is paid at the employee's base pay rate at the time of the absence.

Employees with an unexpected need (i.e. sudden illness or emergency) to request PTO should notify the Managing Partner as early as possible.

Work-related accidents and illness are covered by Workers' Compensation Insurance, pursuant to the requirements of the laws in the Commonwealth of Massachusetts. The PTO policy outlined above does not apply to those illnesses or injuries that are covered by an applicable Workers' Compensation policy.

Vacation time should be approved in advance by your supervisor and planned as far in advance as possible. You may "borrow" against your PTO up to five days per year. If you leave Pinnacle before earning the days you've borrowed, you must repay the Company via direct payment or payroll deduction from your final check. Upon termination, if you have earned more days than you have taken the employee will be paid for those days.

Health Insurance

Pinnacle Health Management LLP's health insurance benefits are intended to protect you and your family from financial loss resulting from hospital, surgical, or other health-related expenses.

Eligible employees -those working 32 hours per week or more- may elect to begin health insurance benefits.

For details on the specific health insurance plans available through Pinnacle Health Management LLP, contact the Managing Partner. We encourage both you and your family to review the plan's Summary Plan Description (SPD) materials carefully.

Health Insurance Continuation

The Consolidated Budget Reconciliation Act (COBRA) is a federal law that requires most employers sponsoring group health plans to offer a temporary continuation of group health coverage when coverage would otherwise be lost due to certain specific events.

Through COBRA, employees and their qualified beneficiaries have the right to continue group health insurance coverage after a "qualifying event." The following are qualifying events:

- Resignation or termination of the employee
- Death of the covered employee
- A reduction in the employee's hours
- For spouses and eligible dependents, the employee's entitlement to Medicare
- Divorce or legal separation of the covered employee and his or her spouse
- A dependent child no longer meeting eligibility requirements under the group health plan

Under COBRA, the employee or beneficiary pays the full cost of health insurance coverage at Pinnacle Health Management LLP's group rates plus an administration fee.

Notification Requirements:

The employee, or family member, has the responsibility to inform the Managing Partner of a divorce, legal separation, or a child losing dependent status within 60 days of the event. Pinnacle Health

Management LLP has the responsibility to notify the Plan Administrator of the employee's death, termination of employment, or reduction in hours.

Once the notification has been made to the Plan Administrator, the Plan Administrator will inform the employee that he or she has the right to choose continuation of coverage. If employees choose to continue coverage, Pinnacle Health Management LLP is required to provide coverage which is identical to the coverage provided under the plan to similarly situated employees or family members.

Period of Coverage:

Continuation of coverage is extended from the date of the qualifying event for a period of 18 to 36 months. The length of time for which continuation coverage is made available (i.e., the "maximum period" of continuation coverage) depends on the type of qualifying event that gave rise to the employee's COBRA rights.

An employee's continuation of coverage may be cut short for any of the following reasons:

- Pinnacle Health Management LLP no longer provides group health coverage to any of its employees
- The premium for your continuation coverage is not paid in full on a timely basis
- You become covered under another group health plan that does not contain any exclusion or limitation with respect to any pre-existing condition
- You become entitled to Medicare

Workers' Compensation

Employees who are injured on the job at Pinnacle Health Management LLP are eligible for Workers' Compensation benefits. Such benefits are provided at no cost to employees and cover any injury or illness sustained in the course of employment that requires medical treatment.

Employees who sustain work-related injuries or illnesses must notify the Managing Partner immediately so that Pinnacle Health Management LLP can notify the workers' compensation insurance carrier as soon as possible.

Lost time or medical expenses incurred as a result of an accident or injury which occurred while an employee was on the job will be compensated for in accordance with workers' compensation laws. This protection is paid for in full by Pinnacle Health Management LLP. No premium is charged for this coverage and no individual enrollment is required. Pinnacle Health Management LLP will provide medical care and a portion of lost wages through our insurance carrier.

All job-related accidents or illnesses must be reported to an employee's Managing Partner immediately upon occurrence. Managing Partners will then immediately contact the Managing Partner to obtain the required claim forms and instructions.

Payroll Deductions

Pinnacle Health Management LLP makes deductions from employee pay only in circumstances permitted by applicable law. This includes, but is not limited to, mandatory deductions for income tax withholding and Social Security and Medicare contributions as well as voluntary deductions for health insurance premiums and other related contributions.

If you believe that an improper deduction has been made from your pay, raise the issue with the Managing Partner immediately. Pinnacle Health Management LLP will promptly investigate. If the investigation reveals that you were subjected to an improper deduction from pay, you will be reimbursed promptly.

Retirement Plan

Pinnacle Health Management LLP employees have the opportunity to participate in a company-sponsored retirement plan. All employees are eligible to participate in the plan provided that they are reasonably expected to earn \$5,000 in the coming year or earned over \$5,000 in the prior year.

Employees may consult the Managing Partner and refer to plan documents for more details.

Holidays

Pinnacle Health Management LLP observes the following holidays:

- New Year's Day
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day
- Christmas Day

Employees with accrued PTO may elect to use time on holidays.

Jury Duty

Pinnacle Health Management LLP encourages employees to fulfill their civic responsibilities when called upon to serve as a juror. Employees must provide the Managing Partner with a copy of their jury summons as soon as possible so that the Managing Partner may make arrangements to accommodate their absence.

Employees on jury duty must report to work on workdays, or parts of workdays, when they are not required to serve. Either Pinnacle Health Management LLP or the employee may request an excuse from jury duty if it is determined that the employee's absence would create serious operational difficulties.

Jury duty will be paid to employees with full time status if required by applicable state law. If paid, jury duty pay will be calculated on the employee's base pay rate times the number of hours the employee would otherwise have worked on the day of absence.

Military Leave

Pinnacle Health Management LLP proudly grants employees time off of work for service in the uniformed services in accordance with the Uniformed Services Employment and Reemployment Rights Act (USERRA).

All employees requesting time off for military service must provide advance notice of military service to their immediate Managing Partner, unless military necessity prevents such notice or it is otherwise impossible or unreasonable. Continuation of health insurance benefits is available during military leave subject to the terms and conditions of the group health plan and applicable law.

Employees are eligible for re-employment for up to five (5) years from the date their military leave began. The period an individual has to make application for reemployment or report back to work after military service is based on time spent on military duty. For service of less than 31 days, the service member must return at the beginning of the next regularly scheduled work period on the first full day after release from service, taking into account safe travel home plus an eight-hour rest period. For service of more than 30 days but less than 181 days, the service member must submit an application for reemployment within 14 days of release from service. For service of more than 180 days, an application for reemployment must be submitted within 90 days of release from service.

Employees who qualify for re-employment will return to active employment at a pay level and status equal to that which they would have attained had they not entered military service. They will be treated as though they were continuously employed for purposes of determining benefits based on length of service.

Questions regarding this policy should be directed to the Managing Partner.

Maternity Leave

A female employee is eligible for maternity leave if:

- she has been employed by Pinnacle Health Management for at least three consecutive months as a full-time employee; and
- she is absent from such employment for a period not exceeding eight weeks for the purpose of:
 - giving birth; or
 - adopting a child under the age of 18; or
 - adopting a child under the age of 23, if the child is mentally or physically disabled; and
- she gives her employer at least two weeks' notice of her anticipated date of departure and intention to return.

Up to eight (8) weeks of leave is available to regular full-time female employees. Employees with accrued PTO may elect to apply PTO to cover part of her absence. Any additional leave entitlement may be taken as unpaid leave.

Bereavement Leave

Bereavement leave provides time off for all employees in the event of a death in their immediate family. Full time employees are entitled to utilize accrued PTO at their discretion.

Employee and Customer Referral Program

Pinnacle Health Management LLP offers an employee referral program to encourage employees to recommend qualified candidates. Our referral program provides employees with a referral bonus for successful hires made based upon an employee's recommendation. If a recommended candidate is hired and completes 6 months of service, the employee who provided the referral will be entitled to a bonus equal to \$100 per day of the referred employees weekly work commitment.

All referred candidates will be considered and evaluated based on experience and qualifications and will be subject to the same pre-employment standards as all other candidates.

Similarly, employees whose initiative results in a contractual relationship with a new customer will receive a bonus payment of \$500 for homes greater than 100 beds and \$250 for homes with fewer than 100 beds.

Questions regarding this policy should be directed to the Managing Partner.

Timekeeping and Payroll

Timekeeping

It is the company's policy to comply with applicable laws that require records to be maintained of the hours worked by our employees. Every employee is responsible for accurately recording hours worked and location/work site. The procedure for reporting time calls for each employee to complete and submit a "*Time Keepah*" no later than noon on the Sunday following the end of the pay period. A copy of the *Time Keepah* is made available in both Excel and .pdf versions. The latter version is sent out to each employee at the beginning of each pay period.

Each employee is required to submit a *Time Keepah*' as in addition to communicating hours worked, the *Time Keepah* informs the employer of the employee's work location which enables the billing office to verify that all encounter forms have been received. Failure to submit a *Time Keepah* may result in payroll deferral to the following pay period.

Payroll

Pinnacle Health Management LLP employees are paid on a biweekly basis. Paydays occur the Thursday following the end of the pay period. In the event that a regularly scheduled payday falls on a holiday, employees will be paid on the day preceding the holiday, unless otherwise required by state law.

Paychecks will not, under any circumstances, be given to any person other than the employee without written authorization. Paychecks may also be mailed to the employee's listed address or, upon advance written authorization, deposited directly into an employee's bank account (direct deposit is strongly encouraged). Employees who elect payment through direct deposit will receive an itemized statement of wages when the Company makes direct deposits.

In the event of employee termination, the employee will receive their accrued pay in accordance with applicable federal, state and local laws.