

## **CORE STAFFING SERVICES, INC.**

### **CORPORATE RESPONSIBILITY POLICY**

At Core, we build long-standing, personal relationships with our clients, employees and applicants based on sincerity, honesty and trust. Since 1988 we have built our business with uncompromising integrity, exemplary service and unyielding commitment to our clients, employees and applicants.

While Core is acutely aware of and concerned with the environment maintained in our offices and among our employees, we are also aware that we have the ability to affect our environment on a larger scale. Core believes in the Universal Declaration of Human Rights and supports universal human rights, particularly those of our employees in the communities within which we operate, and expects the same from parties with whom we do business.

It is the desire of Core, to not only be a good business, but also a good citizen by conducting business in an ethical and socially responsible manner. To achieve this end Core subscribes to the following policies and principles in conducting business and attempts to promote the application of the following policies and principles by those with whom we do business.

Corporate Governance: As a closely held company, Core has only a few shareholders. Core is led by its Board of Directors, which is responsible for ensuring that Core adheres to its policies and complies with applicable laws and regulations.

Ethical Standards: We endeavor to respect the ethical, moral and religious standards and beliefs of all people and cultures that we deal with.

Legal Requirements: We demand that our employees, and expect that our business partners, abide by the applicable laws of the locale in which we conduct business.

Health and Safety: We strive to ensure a safe, secure and healthy working environment in all of Core's office locations. We expect that any clients to whom we assign temporary employees or refer permanent employee applicants will also endeavor to provide a safe, secure and healthy working environment.

Environmental Safekeeping: Core operates under the philosophy that it is the responsibility of every person and entity to be aware of their environment and to maintain and protect that environment. We subscribe to sustainable development practices that insure the safekeeping of our natural resources and expect our business partners to also adhere to these principles. We have adopted a four-step approach to waste management within our offices:

- (1) reduce,
- (2) reuse,
- (3) recycle, and
- (4) as a last option, dispose of waste using safe and responsible means.

We aim to purchase products made from recycled materials where available, including copy paper and note pads, encourage internal communication via e-mail in order to reduce the amount of paper

used, utilize energy saving functions of computers and use energy efficient lighting. We encourage our employees to use mass transportation when commuting to and traveling for work.

Fair Competition: Core promotes fair competition including respect for intellectual and other property rights and does not offer, pay or accept bribes or excessive gifts. Core targets all marketing efforts toward those we deem most likely to benefit from our services and does not promote any products that might be deemed controversial or inappropriate toward children. Core endeavors to keep its advertising straightforward and representative of our services

Free Association: Core respects its employees' right of free association.

Wages and Benefits: The wage and benefit structure of our suppliers and clients must comply with all applicable laws. Wages and benefits paid to our employees are competitive, not only out of respect for the skill of our employees, but in an effort to retain the highest caliber employees available. Core pays its employees at applicable overtime rates mandated by federal, state and local law.

Working Hours: We expect our suppliers and clients to operate based on prevailing local work hours. Any time worked over the norm for the area must be compensated at the overtime rate as prescribed by applicable labor laws. In order to allow employees a reasonable amount of time off from their duties for rest we ensure that our employees receive all legally mandated rest periods and breaks they are entitled to and encourage our contractors and suppliers to allow meal breaks and rest periods where not required by law.

Child Labor: The use of child labor is not permissible. For a definition of "child" we will look first to the applicable laws of the location in which business is being conducted. If, however, such laws do not provide a definition or if the definition includes individuals below the age of 15, we will define "child" for purposes of determining the use of illegal child labor, as any one who is: (a) less than 15 years of age; or (b) younger than the compulsory age to be in school in the country in which business is being conducted, if that age is higher than 15.

Involuntary Labor: We will not knowingly utilize or purchase materials and/or products manufactured by prison, forced or involuntary labor.

Discrimination: We recognize and are aware that cultural differences will exist between various peoples. However, we do believe that people should be employed based on their ability to perform a needed function not on the basis of personal beliefs or characteristics. Core supports diversity in the workplace and provides equal employment opportunity to all employees and applicants without regard to age, race, creed, color, religion, national origin, sex, disability, veteran status, marital status, sexual preference or any other protected status in accordance with applicable federal, state and local laws.

Disciplinary Practices: Core does not condone any type of corporal, mental or physical discipline or punishment by a supplier, employee or client. We believe in each person's right to be free from cruel, inhumane or degrading treatment.

## **CORE STAFFING SERVICES, INC. FAIR WORK ENVIRONMENT POLICY**

### Equal Employment Opportunity

Equal Employment Opportunity has been and continues to be both policy and practice at Core. Core provides equal employment opportunity to all employees and applicants without regard to age, race, creed, color, religion, national origin, sex, disability, veteran status, marital status, sexual preference or any other protected status in accordance with applicable federal, state and local laws. This policy governs all areas of employment at Core including recruiting, hiring, training, promotions, compensation, benefits, discipline and terminations.

It is the policy of Core to promote a fair and collegial working environment for all of Core's employees. In keeping with this policy, sexual, racial, religious, ethnic or other harassment of any employee by anyone is contrary to Core's policy and will not be condoned or tolerated. Core will endeavor to keep the workplace free of any conduct which creates an intimidating, hostile or abusive work environment. Any employee who violates this policy will be subject to discipline, up to and including discharge.

### Sexual Harassment

While all forms of discriminatory harassment are prohibited, Core wishes to emphasize the special problems of sexual harassment. Sexual harassment includes unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when: (a) submission of such conduct is, explicitly or implicitly, a term or condition of employment, (b) an employee's response to such conduct is used as the basis for any employment decision, or (c) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating a hostile, intimidating or abusive work environment. Sexual harassment is prohibited whether directed toward a man or a woman by a man or a woman regardless of whether the employee accepts or rejects any advance or is offended by any conduct.

Core does not wish to interfere with the personal lives of its staff; however, any conduct of a sexual nature directed toward Core staff that is not welcome and creates a hostile or abusive work environment can be sexual harassment, whether committed by supervisory or non-supervisory personnel. Examples of conduct that could constitute sexual harassment include:

- sexual touching, advances or propositions;
- verbal abuse, epithets, derogatory statements or slurs;
- graphic or suggestive comments about an individual's dress or body;
- use of sexually degrading words to describe an individual; and
- the display of sexually suggestive objects or pictures, including nude photographs.

### Accommodation for Disabilities

Core endeavors to provide equal employment opportunities to otherwise qualified individuals with disabilities, which includes providing reasonable accommodations to the extent practicable. In general, it is an employee's responsibility to notify Core of the need for an accommodation. If an employee notifies Core that an accommodation is required, the employee may be asked for input about the type of accommodation necessary or the functional limitations caused by the disability.

## Safety

Core adheres to the rules and regulations of the Occupational Safety & Health Administration (OSHA). While management regularly conducts internal audits, Core encourages all employees to bring any potential workplace health and safety issue to Core's attention so that Core may take all steps necessary to remedy the situation.

## Handling Complaints

Any employee who believes that he or she has been subject to workplace harassment of any kind, should report the matter as soon as possible. Normally, such complaints should be brought to Mr. Mitch Heine, but complaints may be brought directly to any member of management if the matter is personal or sensitive, Mr. Mitch Heine is involved or for other similar reasons. Core understands that complaints of harassment can be extremely sensitive and, as far as practicable, will keep such complaints and all communications concerning them in strict confidence.

Core will investigate all complaints of harassment promptly, fairly, thoroughly and as confidentially as practicable. If Core determines that harassment has occurred, appropriate corrective action will be taken as warranted by the circumstances. Any employee, including, but not limited to, supervisors and managers, who is found after investigation to have engaged in harassment of an employee will be subject to appropriate disciplinary action depending on the circumstances, up to and including discharge.

Core's policy also applies to improper conduct toward Core's staff by clients, customers, contractors, vendors and other non-employees. If an employee informs Core that he or she has been subject to sexual or other harassment in the workplace by a non-employee, that individual will be informed of Core's policy and appropriate corrective action and preventative steps will be taken.

## Discrimination Complaints

Core respects the right of each employee who in good faith complains about illegal discrimination of any kind, including sexual and other workplace harassment, or who provides information in connection with any such complaint. Retaliation against any employee for engaging in these protected activities is contrary to Core's policy and will not be condoned or tolerated. If any employee believes that he or she has experienced illegal discrimination or retaliation he or she should report that immediately to Mr. Mitch Heine or, if that is problematic, to any member of management.

## Conflicts of Interest

Core requires that its employees do not allow their personal interests to conflict with their duties to Core and Core's clients. Specifically, Core prohibits its employees from insider trading and requires all employees assigned to clients who are public corporations or who potentially deal with insider information to sign a confidentiality agreement and/or an insider trading policy as required by the client. All employees are encouraged to report conflicts of interest that do arise so that as a company we may deal with and resolve them.

## Improper Gifts or Transactions

Core employees are prohibited from accepting abnormal prepayments or deposits or payments in cash from any client without the express prior permission of a senior member of Core's

management. Core employees are also strictly prohibited from offering or accepting any unofficial payment, benefit or gift to a client or from a supplier in exchange for business. If consistent with an employee's duties entertaining clients of Core is permitted; however, gifts and entertainment for the benefit of clients are prohibited to the extent they are excessive or imply any improper intentions.

#### Recording Time

All employees who are not exempt under the Fair Labor Standards Act (FLSA) and all exempt employees who are requested to do so by their supervisor shall record their hours worked, including lunch breaks, on a daily basis. Altering, falsifying, tampering with time records or recording time on another employee's time record may result in disciplinary action, up to and including termination of employment.

#### Overtime

Core complies with the FLSA and pays overtime compensation to all nonexempt employees in accordance with applicable federal, state and local wage and hour laws. All employees who work over forty (40) hours in one workweek shall be entitled to overtime pay, which is based on actual time worked. Time off on holidays, sick leave, vacation leave or any leave of absence will not be considered hours worked for purposes of performing overtime calculations. No employee may continue to work after the end of their scheduled hours without his or her supervisor's prior authorization. Employees who work overtime without receiving prior authorization from their supervisor may be subject to disciplinary action, up to and including termination of employment.

#### Deductions from Salary

Deductions may be made from employees' paychecks as required or permitted by law. For example, deductions shall be made for federal, state and local tax withholdings, Social Security contributions, garnishments and unexcused full day absences of any exempt employee. Core shall not make improper deductions from the pay of any salaried employee who is an exempt employee pursuant to the Fair Labor Standards Act. In the event any employee believes there has been an improper deduction from his or her salary he or she should speak with their supervisor immediately. Core shall promptly investigate any complaint of an improper pay deduction. In the event of a finding of an improper pay deduction, the affected employee shall be immediately reimbursed in the amount of such improper deduction.

#### Reporting to Management (Whistleblowing)/Nonretaliation

Core employees are requested to bring all safety concerns, legal violations and instances of wrongdoing at Core or at any of Core's clients to the attention of Core management immediately, including, but not limited to, instances of money laundering, insider trading, bribery, corruption and breaches of confidentiality obligations. Absent any wrongdoing, Core shall not retaliate or take any adverse action against any employee based upon such employee's compliance with this policy.