



POLICY AND PROCEDURE MANUAL

**PrivateSky® Aviation Services, Inc.
One PrivateSky Way, Southwest Florida International Airport
Fort Myers, Florida 33913**

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PrivateSky® Aviation Services, Inc.
Policy and Procedure Manual

TABLE OF CONTENTS

TABLE OF CONTENTS1

MESSAGE FROM THE CEO & THE CHAIRMAN – COMPANY FOUNDER3

051 EMPLOYEE ACKNOWLEDGEMENT FORM 4

060 CUSTOMER RELATIONS 5

EMPLOYMENT6

101 NATURE OF EMPLOYMENT 6

103 EQUAL EMPLOYMENT OPPORTUNITY..... 6

104 BUSINESS ETHICS AND CONDUCT 7

107 IMMIGRATION LAW COMPLIANCE..... 8

108 CONFLICTS OF INTEREST 8

110 OUTSIDE EMPLOYMENT..... 10

112 NON-DISCLOSURE 11

114 DISABILITY ACCOMMODATION..... 12

116 JOB POSTING 13

180 WHISTLEBLOWER POLICY..... 14

EMPLOYMENT STATUS & RECORDS15

201 EMPLOYMENT CATEGORIES..... 15

202 ACCESS TO EMPLOYEE FILES..... 16

203 EMPLOYMENT REFERENCE CHECKS..... 16

204 EMPLOYEE DATA CHANGES 17

205 INTRODUCTORY PERIOD AND ORIENTATION..... 17

208 EMPLOYMENT APPLICATION 18

209 PERFORMANCE EVALUATION 18

210 JOB DESCRIPTIONS..... 19

212 SALARY ADMINISTRATION..... 20

214 MEDICAL INFORMATION PRIVACY 22

216 SOCIAL SECURITY NUMBER POLICY..... 26

280 PASSPORTS AND VISAS..... 27

283 ASSIGNMENT OF WAGES 27

EMPLOYEE BENEFIT PROGRAMS.....27

301 EMPLOYEE BENEFITS.....28

303 VACATION BENEFITS..... 29

305 HOLIDAYS..... 30

306 WORKERS' COMPENSATION INSURANCE 31

307 PERSONAL BUSINESS / SICK LEAVE BENEFITS 31

308 TIME OFF TO VOTE 32

309 BEREAVEMENT LEAVE..... 33

311 JURY DUTY..... 34

313 BENEFITS CONTINUATION (COBRA) 35

316 HEALTH INSURANCE 36

380 UNIFORMS 37

TIMEKEEPING/PAYROLL.....38

401 TIMEKEEPING..... 38

403 PAYDAYS 38

405 EMPLOYMENT TERMINATION AND/OR RESIGNATION..... 39

409 ADMINISTRATIVE PAY CORRECTIONS..... 40

410 PAY DEDUCTIONS AND SETOFFS 40

WORK CONDITIONS & HOURS.....40

PrivateSky® Aviation Services, Inc.
Policy and Procedure Manual

501 SAFETY	41
502 WORK SCHEDULE	42
504 USE OF PHONE AND MAIL SYSTEMS.....	42
505 SMOKING / VAPING / CHEWING TOBACCO / ETC.....	43
506 REST AND MEAL PERIODS	43
507 OVERTIME	44
508 USE OF EQUIPMENT AND VEHICLES.....	45
510 EMERGENCY CLOSINGS.....	45
512 BUSINESS TRAVEL EXPENSES	46
514 VISITORS IN THE WORKPLACE.....	48
516 COMPUTER AND E-MAIL USAGE.....	49
517 INTERNET USAGE	51
518 WORKPLACE AND FACILITIES MONITORING.....	53
522 WORKPLACE VIOLENCE PREVENTION.....	54
523 ACTIVE SHOOTER POLICY.....	55
526 MOBILE PHONE USAGE.....	58
580 COMPANY ISSUED CREDIT CARDS.....	58
583 FACILITY AND PROPERTY SECURITY.....	59
584 COST CONSCIOUSNESS.....	59
587 PARKING.....	60
588 TRAINING & TRAINING COSTS.....	60
589 CHANGES IN ASSIGNMENT.....	61
590 PERSONAL TOOLS.....	61
591 PERSONAL RADIOS.....	62
592 LOCK AND KEY CONTROL PROCEDURES.....	62
LEAVES OF ABSENCE.....	63
601 MEDICAL LEAVE (NON-FMLA).....	63
602 FAMILY AND MEDICAL LEAVE (FMLA) POLICY.....	64
605 MILITARY LEAVE.....	71
607 PREGNANCY-RELATED ABSENCES.....	73
608 DOMESTIC VIOLENCE LEAVE POLICY.....	73
680 PERSONAL ACTIVITIES AND OUTSIDE APPOINTMENTS.....	74
EMPLOYEE CONDUCT & DISCIPLINARY ACTION	75
701 EMPLOYEE CONDUCT AND WORK RULES.....	75
702 DRUG AND ALCOHOL USE.....	79
703 SEXUAL AND OTHER UNLAWFUL HARASSMENT.....	80
704 ATTENDANCE AND PUNCTUALITY.....	82
705 PERSONAL APPEARANCE	83
706 RETURN OF PROPERTY.....	84
710 SECURITY INSPECTIONS	84
712 SOLICITATION	85
714 DRUG TESTING.....	86
718 PROBLEM RESOLUTION AND OPEN DOOR POLICY.....	91
722 WORKPLACE ETIQUETTE	92
780 THEFT OR DAMAGE OF COMPANY PROPERTY.....	93
725 WORKPLACE VIOLENCE POLICY	94
781 PHOTOGRAPHIC EQUIPMENT	96

PrivateSky® Aviation Services, Inc

Policy and Procedure Manual

MESSAGE FROM THE CEO & THE CHAIRMAN – COMPANY FOUNDER

PrivateSky® Aviation Services, Inc. would like to welcome you as a new employee in training to our TOTAL EXCELLENCE™ Team. PrivateSky® Aviation Services, Inc. is an affiliated company of Wolanin Companies Inc., a born and bred American entrepreneurial company that has been in business for over five decades in many different and varied businesses.

TOTAL EXCELLENCE™ is a trademarked program of PrivateSky® Aviation Services, Inc., which means we take professional pride in the considerable aviation accomplishments of our entire Team in dealing fairly and timely with, and in keeping our work commitments to our customers.

The PrivateSky® Aviation Services, Inc. customers are the lifeblood of our business and many who arrive here with their airplanes could, as customers, choose to go elsewhere if we did not provide a high satisfaction level when they visit our facilities. It is our goal as members of the PrivateSky® Aviation Services, Inc. Team to satisfy our customers at fair prices, as established by management, and to keep them coming back year after year to PrivateSky® Aviation Services, Inc.

Your selection to be a employee in training of the PrivateSky® Aviation Services, Inc. Team means that someone in our company has recognized that you have the potential to be a person who can accomplish and maintain the high standards PrivateSky® Aviation Services, Inc. strives for every day. To be a permanent member of our staff, you must demonstrate that you intend to carry out the TOTAL EXCELLENCE™ concept and motto of PrivateSky® Aviation Services, Inc by your professionalism.

During your first ninety (90) days of employment, you will be assigned a Training Mentor within PrivateSky® Aviation Services, Inc. who is always available to answer any questions you have during your in-training phase of employment. Feel free to ask as many questions as you need of your Mentor.

In the future, you too may be asked to be a Company Mentor if your progress within PrivateSky® Aviation Services, Inc. has been exemplary.

Welcome to the exciting work of Professional Aviation Services at PrivateSky® Aviation Services, Inc.!

Victoria J. Wolanin

Victoria J. Wolanin, CEO

Vincent M. Wolanin

Vincent M. Wolanin, CHAIRMAN – COMPANY FOUNDER

PrivateSky® Aviation Services, Inc.

PrivateSky® Aviation Services, Inc
Policy and Procedure Manual

051 Employee Acknowledgement Form

Effective Date: 01/01/2023

Revision Date: 01/01/2023

The contents of this Manual summarize present policies and procedures of PrivateSky® Aviation Services, Inc. and are intended as guidelines. The actions of PrivateSky® Aviation Services, Inc. may vary from written policy. As such, the contents of this Manual do not constitute the terms of a contract or employment. Nothing contained in this Manual should be construed as a guarantee of continued employment. I understand that I should contact the HQ Corporate Office regarding any questions not answered in the Manual.

I have entered into my employment relationship with PrivateSky® voluntarily and acknowledge that there is no specified length of employment. Accordingly, either I or PrivateSky® can terminate the relationship at will, with or without cause, at any time, so long as there is no violation of applicable federal or state law. Any written or oral statement to the contrary by a supervisor, corporate officer, or other agent of PrivateSky® Aviation Services, Inc. is invalid and should not be relied upon by any prospective or existing employee.

Since the information, policies, and benefits described here are necessarily subject to change at any time depending on the particular circumstance of a given situation, I acknowledge that revisions to the Manual may occur, except to PrivateSky®'s policy of employment-at-will. All such changes will be communicated through official notices, and I understand that revised information may supersede, modify, or eliminate existing policies. Only the CEO of PrivateSky® has the ability to adopt any revisions to the policies in this Manual.

I acknowledge that this Manual is not an employment contract. I understand that it is my responsibility to read and comply with the policies and procedures contained in this Manual and any revisions made to it. I understand that a copy of this Manual is available at all times for review.

I acknowledge that I have read and will fully comply with the policies and procedures set forth in this Manual to include but not be limited to: Policy 516 – Computer and Email Usage; Policy 714 – Drug Testing; and Policy 112 – Non-Disclosure.

EMPLOYEE'S NAME (printed): _____

EMPLOYEE'S SIGNATURE: _____ DATE: _____

060 Customer Relations

Effective Date: 01/01/2023
Revision Date: 01/01/2023

Customers are among our company's most valuable assets. Every employee represents PrivateSky® to our customers and the public. The way we do our jobs presents an image of our entire company. Customers judge all of us by how they are treated with each employee contact. Therefore, one of our first business priorities is to assist any customer or potential customer. Nothing is more important than being courteous, friendly, helpful, and prompt in the attention you give to customers.

PrivateSky® will provide customer relations and services training to all employees with extensive customer contact. Customers who wish to lodge specific comments or complaints should be directed to the employee's immediate supervisor for appropriate action. Our personal contact with the public, our manners on the phone, and the communications we send to customers are a reflection not only of ourselves, but also of the professionalism of PrivateSky®. Positive customer relations not only enhance the public's perception or image of PrivateSky®, but also pay off in greater customer loyalty.

101 Nature of Employment

Effective Date: 01/01/2023
Revision Date: 01/01/2023

Employment with PrivateSky® is voluntarily entered into, and the employee is free to resign at will at any time, with or without cause. Similarly, PrivateSky® may terminate the employment relationship with an employee at any time, with or without notice or cause, so long as there is no violation of applicable federal or state law.

Policies set forth in this Manual are not intended to create an employment contract. Rather, the policies set forth herein act as a guide for employees and management governing the parties' relationship. The provisions of the handbook have been developed at the discretion of management and, except for its policy of employment-at-will, may be amended or cancelled at any time, at PrivateSky®'s sole discretion.

These provisions supersede all existing policies and practices and may not be amended or added to without the express written approval of the CEO and/or Board of PrivateSky®.

103 Equal Employment Opportunity

Effective Date: 01/01/2023
Revision Date: 01/01/2023

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at PrivateSky® will be based on merit, qualifications, and abilities. PrivateSky® does not discriminate in employment opportunities or practices on the basis of age, citizenship, color, disability, family responsibility, genetics, national origin, race, religion, sex or any other characteristic protected by law.

PrivateSky® will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship. This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training, in addition to a commitment to provide equal employment opportunities to all qualified individuals.

Any employees with questions or concerns about any type of perceived discrimination in the workplace are encouraged to bring these issues to the attention of their immediate supervisor or Management Personnel. Employees can raise concerns and make reports without fear of reprisal. Anyone found to be engaging in any type of unlawful discrimination will be subject to disciplinary action, up to and including termination of employment.

104 Business Ethics and Conduct

Effective Date: 01/01/2023
Revision Date: 01/01/2023

The successful business operation and reputation of PrivateSky® is built upon the principles of fair dealing and ethical conduct of our employees. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

The continued success of PrivateSky® is dependent upon our customers' trust and our dedication to preserving that trust. Employees owe a duty to PrivateSky® and its customers to act in a way that will merit the continued trust and confidence of the public.

PrivateSky® will comply with all applicable laws and regulations and expects its directors, officers, and employees to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.

In general, the use of good judgment, based on high ethical principles, will guide you with respect to lines of acceptable conduct. If a situation arises where it is difficult to determine the proper course of action, the matter should be discussed openly with your immediate supervisor and, if necessary, with the CEO for advice and consultation.

Compliance with this policy of business ethics and conduct is the responsibility of every PrivateSky® employee. Disregarding or failing to comply with this standard of business ethics and conduct could lead to disciplinary action, up to and including possible termination of employment.

107 Immigration Law Compliance

Effective Date: 01/01/2023
Revision Date: 01/01/2023

PrivateSky® is committed to employing only United States citizens and workers who are authorized to work in the United States

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

Employees with questions or seeking more information on immigration law issues are encouraged to contact the COO. Employees may raise questions or complaints about immigration law compliance without fear of reprisal.

108 Conflicts of Interest

Effective Date: 01/01/2023
Revision Date: 01/01/2023

Employees have an obligation to conduct business with the highest standards of integrity within guidelines that prevent actual or potential conflicts of interest. This policy establishes only the framework within which PrivateSky® wishes the business to operate. The purpose of these guidelines is to provide general direction so that employees can seek further clarification on issues related to the subject of acceptable standards of operation. Contact the CEO for more information or questions about conflicts of interest.

Transactions with outside firms must be conducted within a framework established and controlled by the executive level of PrivateSky® and with no deviation from complete honesty. Business dealings with outside firms should not result in unusual gains for or from those firms. Unusual gain refers to bribes, product bonuses, special fringe benefits, unusual price breaks, and other windfalls designed to ultimately benefit either the employer, the employee, or both. Promotional plans that could be interpreted to involve unusual gain require specific executive-level approval of CEO and/or Board.

An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or for a relative as a result of PrivateSky®'s business dealings. For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

PrivateSky® Aviation Services, Inc.

Policy and Procedure Manual

No "presumption of guilt" is created by the mere existence of a relationship with outside firms. However, if employees have any influence on transactions involving purchases, contracts, or leases, it is imperative that they disclose to an officer of PrivateSky® as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.

Personal gain may result not only in cases where an employee or relative has a significant ownership in a firm with which PrivateSky® does business, but also when an employee or relative receives any kickback, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving PrivateSky®.

In order to avoid conflicts of interest, each employee must observe the following:

- Maintain a high standard of conduct and disqualify yourself from exerting influence in any transaction where you find your own interest may conflict with the best interests of the company, or where you gain any undue financial benefit;
- Report to the company any financial interest that you or any member of your family may have in any concern doing business with the company;
- Report promptly to senior management any payment (cash, merchandise, or services you receive from an individual or concern with which the company does business);
- Acceptance of any gifts or merchandise over a value of \$50.00 from anyone who has a business relationship with the company has to be approved by the CEO;
- Refrain from lending money to, borrowing money from, or having loans guaranteed by anyone doing business with the company, except that any employee may borrow from a financial institution with which the company does business;
- Use of company funds for improper purposes and dishonest practices is strictly forbidden;
- Do not use information or knowledge acquired through your position in the company for personal gain or advantage, by divulging such knowledge or information to anyone who would use it in any manner detrimental to the interests of the company, Chairman, CEO or board members; and
- Report any knowledge of violations of the above policy. Violations are to be reported to the CEO in writing by email.

An employee who serves, without the company's prior consent, as a consultant to or director, officer or part-time employee of a company which competes with or deals with PrivateSky® Aviation Services, Inc. or its affiliates, or which seeks to do so, has a conflict of interest. This is true even if the employee receives no pay from the other company or has no direct or indirect contact with it in his or her job at PrivateSky® because he/she may inadvertently disclose proprietary information to the other company. You should obtain the approval of the CEO before accepting outside work.

PrivateSky® Aviation Services, Inc.
Policy and Procedure Manual

110 Outside Employment

Effective Date: 01/01/2023

Revision Date: 01/01/2023

An employee may hold a job with another non-competing organization as long as he or she satisfactorily performs his or her job responsibilities with PrivateSky®. All employees will be judged by the same performance standards and will be subject to PrivateSky®'s scheduling demands, regardless of any existing outside work requirements.

If PrivateSky® determines that an employee's outside work interferes with performance or the ability to meet the requirements of PrivateSky® as they are modified from time to time, the employee may be asked to terminate the outside employment if he or she wishes to remain with PrivateSky®.

Outside employment will present a conflict of interest if it has an adverse impact on PrivateSky®.

112 Non-Disclosure

Effective Date: 01/01/2023
Revision Date: 01/01/2023

While employed at PrivateSky® Aviation Services, Inc., employees may have access to and become acquainted with information on a confidential, proprietary or secret nature. This information is or may be applicable or related to our present or future business or development. Information about our internal affairs, employees or clients/customers should not be divulged, directly or indirectly, to anyone other than persons who have a right to know or who are authorized by PrivateSky® to receive such information. Employees shall not use confidential information either during the term of their employment or at any time thereafter, except that which is required in the course of employment with PrivateSky®. When in doubt as to whether certain information is or is not confidential, no disclosure should be made without first clearly establishing that such disclosure has been appropriately authorized. This basic policy of caution and discretion in handling confidential and/or sensitive information extends to both internal and external disclosure. Be extremely careful not to discuss customers with other customers. Violation of this policy may result in disciplinary action up to and including dismissal. The protection of confidential business information and trade secrets is vital to the interests and the success of PrivateSky®. Such confidential information includes, but is not limited to, the following examples:

- * PrivateSky® copyrighted material
- * trade secret information
- * proprietary information
- * computer data
- * photographic data
- * computer processes
- * computer programs and codes
- * customer lists, phone numbers, emails
- * customer preferences
- * financial information
- * marketing strategies
- * new materials research
- * pending projects and proposals
- * proprietary production processes
- * research and development strategies
- * technological data
- * technological prototype
- * voicemails

All employees are required to sign a Non-Disclosure agreement as a condition of employment. Employees who improperly use or disclose trade secrets or confidential business information will be subject to disciplinary action, up to and including termination of employment and legal action, even if they do not actually benefit from the disclosed information.

114 Disability Accommodation

Effective Date: 01/01/2023
Revision Date: 01/01/2023

PrivateSky® is committed to complying fully with the Americans with Disabilities Act as amended (ADA) and ensuring equal opportunity in employment for qualified persons with disabilities. All employment practices and activities are conducted on a non-discriminatory basis.

Hiring procedures have been reviewed and provide persons with disabilities meaningful employment opportunities.

Post-offer medical examinations are required only for those positions in which there is a bona fide job-related physical requirement. They are given to all persons entering the position only after conditional job offers. Medical records will be kept separate and confidential.

Reasonable accommodation is available to all disabled employees where their disability affects the performance of job functions. All employment decisions are based on the merits of the situation in accordance with defined criteria, not the disability of the individual.

Qualified individuals with disabilities are entitled to equal pay and other forms of compensation (or changes in compensation) as well as in job assignments, classifications, organizational structures, position descriptions, lines of progression, and seniority lists. Leave of all types will be available to all employees on an equal basis.

PrivateSky® is also committed to not discriminating against any qualified employees or applicants because they are related to or associated with a person with a disability. PrivateSky® will follow any state or local law that provides individuals with disabilities greater protection than the ADA.

This policy is neither exhaustive nor exclusive. PrivateSky® is committed to taking all other actions necessary to ensure equal employment opportunity for persons with disabilities in accordance with the ADA and all other applicable federal, state, and local laws.

116 Job Posting

Effective Date: 01/01/2023
Revision Date: 01/01/2023

PrivateSky® provides employees an opportunity to indicate their interest in open positions and advance within the company according to their skills and experience. In general, notices of all regular, full-time job openings are posted, although PrivateSky® reserves its sole discretionary right to not post a particular opening.

Job openings will be posted on the employee bulletin boards and normally remain open for ten (10) days. Each job posting notice will include the dates of the posting period, job title, department, location, grade level, job summary, essential duties, and qualifications (required skills and abilities).

To be eligible to apply for a posted job, employees must have performed competently for at least 180 calendar days in their current position. Employees who have a written warning on file, or are on probation or suspension are not eligible to apply for posted jobs. Eligible employees can only apply for those posted jobs for which they possess the required skills, competencies, and qualifications.

To apply for an open position, employees should submit a job posting application to the Business Office listing their job-related skills and accomplishments. It should also describe how their current experience with PrivateSky® and prior work experience and/or education qualifies them for the position.

Job posting is a way to inform employees of openings and to identify qualified and interested applicants who might not otherwise be known to the hiring manager. Other recruiting sources may also be used to fill open positions in the best interest of the company.

180 Whistleblower Policy

Effective Date: 01/01/2023
Revision Date: 01/01/2023

PrivateSky® Aviation Services, Inc. will not tolerate illegal, dishonest, fraudulent or improper business practices. If an employee has knowledge of or a concern that there is or may be illegal, dishonest, fraudulent or improper practices affecting PrivateSky® Aviation Services, Inc.'s business or services, the employee is expected to contact the COO. Every employee is responsible for reporting any violation or suspected violation of this policy. The knowing failure to report a violation is in itself a violation of this policy. The reporting employee is not responsible for investigating the activity complained of or for determining fault or corrective measures. Appropriate persons with PrivateSky® will investigate good faith complaints. If a criminal violation has occurred, PrivateSky® will take appropriate steps to stop the criminal conduct and to prevent such conduct from recurring. It is PrivateSky®'s policy to cooperate with all government investigation of possible unlawful conduct.

Employees will not be disciplined or suffer any retaliation for reporting honestly and in good faith suspected violations of the law or improper business practices. Any reporting employee who believes he/she is being retaliated against because of the report should contact the CEO immediately. Protection against retaliation does not include any immunity for any personal wrongdoing that is alleged and investigated.

All reports made under this policy will be treated in confidence except as is necessary to conduct a thorough investigation, to comply with the law, and to provide accused individuals their legal rights of defense.

201 Employment Categories

Effective Date: 01/01/2023
Revision Date: 01/01/2023

It is the intent of PrivateSky® to clarify the definitions of employment classifications so that employees understand their employment status and benefit eligibility. These classifications do not guarantee employment for any specified period of time. Accordingly, the right to terminate the employment relationship at will at any time is retained by both the employee and PrivateSky®.

Each employee is designated as either NONEXEMPT or EXEMPT from federal and state wage and hour laws. NONEXEMPT employees are entitled to overtime pay under the specific provisions of federal and state laws. EXEMPT employees are excluded from specific provisions of federal and state wage and hour laws. An employee's EXEMPT or NONEXEMPT classification may be changed only upon written notification by PrivateSky® management.

In addition to the above categories, each employee will belong to one other employment category:

REGULAR FULL-TIME employees are those who are not in a temporary or introductory status of one hundred twenty (120) days, and who are regularly scheduled to work at least forty (40) hours per week and at least 2,080 hours per year. Generally, they are eligible for PrivateSky®'s benefit package, subject to the terms, conditions, and limitations of each benefit program. For Health Insurance purposes, employees must regularly work thirty (30) hours per week.

REGULAR PART-TIME employees are those who have successfully completed the introductory period of one hundred twenty (120) days and is scheduled to work less than 36 hours per week and/or less than 1,800 hours per year. Generally, they are not eligible for PrivateSky®'s benefit packages.

INTRODUCTORY employees are those whose performance is being evaluated to determine whether further employment in a specific position or with PrivateSky® is appropriate. Employees who satisfactorily complete the introductory period of one hundred twenty (120) days will be notified of their new employment classification.

TEMPORARY employees are those who are hired as interim replacements, to temporarily supplement the work force, or to assist in the completion of a specific project. Employment beyond any initially stated period does not in any way imply a change in employment status. Temporary employees retain that status unless and until notified of a change. Temporary employees are ineligible for all of PrivateSky®'s benefit programs.

CONTRACT and CONTRACT TO HIRE employees are those who have entered into a formal contract with PrivateSky® to provide specific services as outlined, for a specified time and at a predetermined wage. Employment beyond any initially stated period does not in any way imply a change in employment status. CONTRACT and CONTRACT TO HIRE employees retain that status unless and until notified of a change. CONTRACT and CONTRACT TO HIRE are ineligible for all of PrivateSky®'s benefit programs

202 Access to Employee Files

Effective Date: 01/01/2023
Revision Date: 01/01/2023

PrivateSky® maintains an employee file on each employee. The employee file includes such information as the employee's job application, resume, records of training, documentation of performance appraisals and salary increases, and other employment records.

Employee files are the property of PrivateSky®, and access to the information they contain is restricted. Generally, only management personnel of PrivateSky® who have a legitimate reason to review information in a file are allowed to do so with the approval of the CEO.

Employees who wish to review their own file should contact their supervisor. With reasonable advance notice, employees may review their own personnel files in PrivateSky®'s offices and in the presence of an individual appointed by PrivateSky® to maintain the files.

203 Employment Reference Checks

Effective Date: 01/01/2023
Revision Date: 01/01/2023

To ensure that individuals who join PrivateSky® are well qualified and have a strong potential to be productive and successful, it is the policy of PrivateSky® to check the employment references of all applicants.

The Business Office will respond in writing only to those reference check inquiries that are submitted in writing. Responses to such inquiries will confirm only dates of employment, wage rates, and position(s) held. No employment data will be released without a written authorization and release signed by the individual who is the subject of the inquiry.

204 Employee Data Changes

Effective Date: 01/01/2023

Revision Date: 01/01/2023

It is the responsibility of each employee to promptly notify PrivateSky® of any changes in personal data. Personal mailing addresses, email addresses, phone numbers, number and names of dependents, individuals to be contacted in the event of an emergency, educational accomplishments, and other such status reports should be accurate and current at all times. If any personnel data has changed, notify the Business Office.

205 Introductory Period and Orientation

Effective Date: 01/01/2023

Revision Date: 01/01/2023

New employees will be given an orientation of the company and a job description explaining the position and the standard of performance expected. Each new employee will be required to read this Manual to acquaint themselves with company policies, procedures and benefits. If you have any questions about the company, your role or your responsibilities, see your supervisor.

The introductory period is intended to give new employees the opportunity to demonstrate their ability to achieve a satisfactory level of performance and to determine whether the new position meets their expectations. PrivateSky® uses this period to evaluate employee capabilities, work habits, and overall performance. Either the employee or PrivateSky® may end the employment relationship at will at any time during or after the introductory period, with or without cause or advance notice.

All new and rehired employees work on an introductory basis for the first one hundred twenty (120) calendar days after their date of hire. Employees who are promoted or transferred within PrivateSky®, must complete a secondary introductory period of the one hundred eighty (180) days with each reassignment to a new position. Any significant absence will automatically extend an introductory period by the length of the absence. If PrivateSky® determines that the designated introductory period does not allow sufficient time to thoroughly evaluate the employee's performance, the introductory period may be extended for a specified period.

In cases of promotions or transfers within PrivateSky®, an employee who, in the sole judgment of management, is not successful in the new position can be removed from that position at any time during the secondary introductory period. If this occurs, the employee may be allowed to return to his or her former job or to a comparable job at the prior pay rate for which the employee is qualified, depending on the availability of such positions and PrivateSky®'s needs.

Upon satisfactory completion of the initial introductory period, employees enter the "regular" employment classification.

PrivateSky® Aviation Services, Inc.

Policy and Procedure Manual

During the initial introductory period, new employees are eligible for those benefits that are required by law, such as workers' compensation insurance and Social Security. After becoming regular employees, they may also be eligible for other PrivateSky®-provided benefits, subject to the terms and conditions of each benefits program. Employees should read the information for each specific benefits program for the details on eligibility requirements.

Benefits eligibility and employment status are not changed during the secondary introductory period that results from a promotion or transfer within PrivateSky®.

208 Employment Application

Effective Date: 01/01/2023
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PrivateSky® relies upon the strict accuracy of information contained in the employment application, as well as the accuracy of other data presented throughout the hiring process and employment. Any misrepresentations, falsifications, or material omissions in any of this information or data may result in the exclusion of the individual from further consideration for employment or, if the person has been hired, termination of employment.

209 Performance Evaluation

Effective Date: 01/01/2023
Revision Date: 01/01/2023

One of the most important obligations you assume as an employee of PrivateSky® is to perform your duties to the best of your ability. A significant ingredient in the success of PrivateSky® has been the determination of each employee to do his or her very best work so that we will prosper as a team.

Supervisors and employees are strongly encouraged to discuss job performance and goals on an informal, day-to-day basis. Formal performance evaluations are conducted at the end of an employee's initial period in any new position. This period, known as the introductory period, allows the supervisor and the employee to discuss the job responsibilities, standards, and performance requirements of the new position. Additional formal performance evaluations are usually conducted annually to provide both supervisors and employees the opportunity to discuss job tasks, identify and correct weaknesses, encourage and recognize strengths, and discuss positive, purposeful approaches for meeting goals.

PrivateSky® Aviation Services, Inc.

Policy and Procedure Manual

All new employees can expect to receive a written Performance Evaluation after one hundred twenty (120) days of initial employment. Each year thereafter at or around the anniversary date of hire, the employee will receive a Performance Evaluation. During the Performance Evaluation, the employee will be assessed on the duties performed based on the job description for that position along with certain competencies required in the completion of their duties. It should be noted that Performance Evaluations and merit reviews do not necessarily coincide. Any deficiencies noted as a result of the Performance Evaluation will be addressed during the evaluation procedure. Both the supervisor and employee can work together to improve the employee's overall performance.

In order to resolve any problems in relation to ongoing poor performance, PrivateSky® has a formal corrective action procedure. The procedure is used to inform the employee of a particular problem and the action to resolve it.

Corrective action forms are signed by the individual employee and placed in the employee's departmental personnel file and are as follows:

- Verbal Warning
- Written Warning (For more serious violations: 1-2 day suspension without pay optional – remains in record for six (6) months)
- Final Notice (up to 3 day suspension without pay and final warning remains in record for one (1) year)
- Termination

The above is not all-inclusive. The company may terminate the employment relationship for any reason deemed appropriate and, in similar manner; an employee may leave at any time for reasons deemed appropriate.

210 Job Descriptions

Effective Date: 01/01/2023

Revision Date: 01/01/2023

PrivateSky® makes every effort to create and maintain accurate job descriptions for all positions within the company. Each description includes a job information section, a job summary section (giving a general overview of the job's purpose), an essential duties and responsibilities section, a supervisory responsibilities section, a qualifications section (including education and/or experience, language skills, mathematical skills, reasoning ability, and any certification required), along with competency requirements.

PrivateSky® maintains job descriptions to aid in orienting new employees to their jobs, identifying the requirements of each position, establishing hiring criteria, setting standards for employee performance evaluations, and establishing a basis for making reasonable accommodations for individuals with disabilities.

PrivateSky® Aviation Services, Inc.

Policy and Procedure Manual

The Business Office and the hiring manager prepare job descriptions when new positions are created. Existing job descriptions are also reviewed and revised in order to ensure that they are up to date. Job descriptions may also be rewritten periodically to reflect any changes in the position's duties and responsibilities. All employees will be expected to help ensure that their job descriptions are accurate and current, reflecting the work being done.

Employees should remember that job descriptions do not necessarily cover every task or duty that might be assigned, and that additional responsibilities may be assigned as necessary. Contact the Business Office if you have any questions or concerns about your job description.

212 Salary Administration

Effective Date: 01/01/2023

Revision Date: 01/01/2023

The salary administration program at PrivateSky® was created to achieve consistent pay practices, comply with federal and state laws, mirror our commitment to Equal Employment Opportunity, and offer competitive salaries within our labor market. Because recruiting and retaining talented employees is critical to our success, PrivateSky® is committed to paying its employees equitable wages that reflect the requirements and responsibilities of their positions and are comparable to the pay received by similarly situated employees in other organizations in the area.

Compensation for every position is determined by several factors, including job analysis and evaluation, the essential duties and responsibilities of the job, and salary survey data on pay practices of other employers. PrivateSky® periodically reviews its salary administration program and restructures it as necessary. Merit-based pay adjustments may be awarded in conjunction with superior employee performance documented by the performance evaluation process.

PrivateSky® Aviation Services, Inc.'s policy is to have a pay structure that reflects both the value of a position to the company, the importance, responsibility and difficulty of the job. It is also the company practice to pay rates that compare favorably with those paid by competitive employers in the appropriate regional and industry markets.

The company's compensation program establishes salary ranges for non-exempt and exempt employees as defined by the Fair Labor Standards Act.

Every employee is eligible to receive increases based on initiative, capabilities and job performance rather than any predetermined schedule on the job. Continued good performance will merit continued consideration for increases within the guidelines of the plan. Seniority is not a basis for a merit increase

PAY RANGES:

Position levels and salary ranges are established for each job classification. Each salary range has a minimum and a maximum level for the job grade, based on industry standards.

PrivateSky® Aviation Services, Inc.

Policy and Procedure Manual

Minimum - this indicates the lowest limit of payment for acceptable job performance. At the minimum, the jobholder should be able to perform the major portion of the job at a minimum acceptable level of proficiency. The individual should also exhibit the necessary intelligence, interest, willingness and ability to perform the job in a completely satisfactory manner, given the necessary training and experience.

Maximum - This indicates the limit of payment for the required skill of a given position.

Merit-based pay adjustments are awarded by PrivateSky® in an effort to recognize truly superior employee performance. The decision to award such an adjustment is dependent upon numerous factors, including the information documented by a formal performance evaluation process. Merit-based pay adjustments are conducted at the sole discretion of PrivateSky® senior management.

BASE RATE PAY SYSTEM – Applies to MRO Service Center ONLY

You may be selected or advanced to work in a PrivateSky® department in which the pay rate is determined by the completion of a task (known as Base Rate Pay) rather than on an hourly paid basis. In that case, it is the goal to finish the work in a time efficient manner and on a quality-reviewed basis, which means all work must pass compliance by the Chief Inspector of the facility. In that respect, during the progress of the task, and when the task is completed, the pay is determined on the number of hours allotted to that task, rather than actual time spent working on the task. This is similar to the system used in the auto repair business so that a worker on a team assigned to the task who is very efficient and skilled should actually earn money for the task hours allotted, which is usually more than if he were paid strictly on the actual time spent at the task. This rewards the top workers for their skills in completing a task efficiently, with quality and on time. To be selected as one of these workers, PrivateSky® requires elevated level of skill and professionalism and typically a skill certification status acceptable to management, or a trainee status as determined by management. These positions will only be offered to those with the highest skills as determined solely and in the complete discretion of management of PrivateSky®.

The Base Rate Aviation Pay System described herein is a licensed proprietary system of PrivateSky® Aviation Services, Inc. and is ©2001 PrivateSky® Aviation Services, Inc. as authored by Vincent M. Wolanin, Chairman/Founder. It is not to be used or copied without the express written permission as a permitted licensee user of the PrivateSky® Aviation Services, Inc. Base Rate Pay System.

Employees should bring their pay-related questions or concerns to the attention of their immediate supervisors, who are responsible for the fair administration of departmental pay practices. The CEO is also available to answer specific questions about the salary administration program.

214 Medical Information Privacy

Effective Date: 01/01/2023
Revision Date: 01/01/2023

This Medical Information Privacy policy describes how health information about employees may be used and disclosed by PrivateSky® and how employees can get access to this information. PrivateSky® is committed to maintaining and protecting the confidentiality of our employees' personal information in compliance with the Health Insurance Portability and Accountability Act (HIPAA). The CEO is the designated Privacy Officer for all employee medical information.

This policy of privacy practices applies to the health plans of PrivateSky® that are covered by privacy regulations, for example health benefit plans, pharmacy and dental plans, etc. (collectively referred to as the Benefit Plans). The Benefit Plans are required by federal and state law to protect the privacy of employees' individually identifiable health information and other personal information and to provide employees with notice about their policies, safeguards, and practices. When the Benefit Plans use and/or disclose employees' protected health information, the Benefit Plans are bound by the terms of this policy, or a revised policy, if applicable

The Benefit Plans will not use employees' protected health information or disclose it to others without the employees' authorization, except for the following purposes:

Treatment - The Benefit Plans may disclose employees' protected health information, or employees' covered dependents' protected health information, to a health care provider or administrator for its provision, coordination, or management of the employees' health care and related services. For example, prior to providing a health service to an employee, the employee's doctor may ask for information concerning whether and when the service was previously provided to the employee. The Benefit Plans may use and disclose employees' protected health information for treatment activities of a health care provider.

PrivateSky® Aviation Services, Inc.

Policy and Procedure Manual

Payment - The Benefit Plans may use and disclose employees' protected health information to facilitate payment of premiums for employees' coverage, and to determine and fulfill their responsibility to provide employees' medical, and dental benefits. For example, employees' protected health information may be used to make coverage determinations, administer claims, and coordinate benefits with other coverage employees may have. The Benefit Plans may also disclose employees' protected health information to a health plan or administrator to determine employees' eligibility for coverage, or for the health care provider to obtain payment for health care services provided to the employee.

Health Care Operations - The Benefit Plans may use and disclose employees' protected health information for their health care operations, or the health care operations of a third-party administrator of the Benefit Plans. For example, the Benefit Plans may use protected health information to conduct quality assessment and improvement activities. Other health care operations may include providing appointment reminders, or sending employees information about treatment alternatives or other health-related benefits and services. The Benefit Plans also may disclose employees' protected health information to another health plan or provider that has a relationship with an employee, so that it can conduct quality assessment and improvement activities (for example, to perform case management).

Disclosure to Employer or Operating Company - The Benefit Plans may disclose employees' protected health information to PrivateSky®, or to a company acting on the behalf of PrivateSky®, so that it can monitor, audit, and otherwise administer the employee health benefit plan in which employees participate. PrivateSky® and its operating companies are not permitted to use protected health information for any purpose other than administration of employees' health, and dental benefits. The Benefit Plans will not disclose protected health information to PrivateSky® for the purposes of employment-related actions or decisions, or in connection with any other benefit or employee benefit plan. The Benefit Plans will identify employees who are authorized to receive and use protected health information.

Disclosure to Health Care Vendors and Accreditation Organizations - The Benefit Plans may disclose employees' protected health information to companies with whom they contract, if they need it to perform requested services. For example, the Benefit Plans may provide protected health information to vendors who provide important information and guidance to plan members with chronic conditions such as diabetes and asthma. Protected health information may be disclosed to accreditation organizations such as the National Committee for Quality Assurance (NCQA) for quality measurement purposes. When the Benefit Plans enter into these arrangements, they will obtain a written agreement to protect employees' protected health information.

Public Health Activities - The Benefit Plans may disclose employees' protected health information for the following public health activities and purposes: 1) to report health information to public health authorities that are authorized by law to receive such information for the purpose of controlling disease, injury, or disability; 2) to report child abuse or neglect to a government authority that is authorized by law to receive such reports; 3) to report information about a product or activity that is regulated by the U.S. Food and Drug Administration (FDA) to a person responsible for the quality, safety, or effectiveness of the product or activity; and, 4) to alert a person who may have been exposed to a communicable disease, if the Benefit Plans are authorized by law to give this notice.

PrivateSky® Aviation Services, Inc.

Policy and Procedure Manual

Health Oversight Activities - The Benefit Plans may disclose employees' protected health information to a government agency that is legally responsible for oversight of the health care system or for ensuring compliance with the rules of government benefit programs, such as Medicare or Medicaid, or other regulatory programs that need health information to determine compliance.

For Research - The Benefit Plans may disclose employees' protected health information for medical research purposes, subject to strict legal restrictions.

To Comply with the Law - The Benefit Plans may use and disclose employees' protected health information to comply with the law.

Judicial and Administrative Proceedings - The Benefit Plans may disclose employees' protected health information in a judicial or administrative proceeding or in response to a legal order.

Law Enforcement Officials - The Benefit Plans may disclose employees' protected health information to the police or other law enforcement officials, as required by law or in compliance with a court order or other process authorized by law.

Health or Safety - The Benefit Plans may disclose employees' protected health information to prevent or lessen a serious and imminent threat to employees' health or safety or the health and safety of the general public.

Government Functions - The Benefit Plans may disclose employees' protected health information to various departments of the government such as the U.S. military or the U.S. Department of State.

Workers' Compensation - The Benefit Plans may disclose employees' protected health information when necessary to comply with workers' compensation laws.

Other - The Benefit Plans may disclose employees' protected health information when necessary to file claims with re-insurers or stop-loss carriers, or to obtain coverage with re-insurers or stop-loss carriers. The Benefit Plans may also disclose employees' protected health information to subrogation vendors to recoup payments made by the Benefit Plans that were reimbursed by other insurance arrangements.

Uses and Disclosures with Employees' Written Authorization - The Benefit Plans will not use or disclose employees' protected health information for any purpose other than the purposes described in this policy without the employees' written authorization. For example, the Benefit Plans will not supply protected health information to another company for its marketing purposes or to a potential employer with whom an employee is seeking employment without the employee's signed authorization. Employees may revoke an authorization that has previously been given by sending a written request to the COO, but not with respect to any actions the Benefit Plans have already taken.

PrivateSky® Aviation Services, Inc.

Policy and Procedure Manual

Disclosure to Others Involved in an Employee's Care - The Benefit Plans may disclose protected health information about employees to a relative, a friend, the subscriber of employees' benefits, or any other person employees identify, provided the information is directly relevant to that person's involvement with employees' health care or payment for that care. For example, if a family member or a caregiver calls PrivateSky® with knowledge of an employee's protected health information, PrivateSky® may confirm protected health information or answer questions. Employees have the right to stop or limit this type of disclosure by contacting the COO. If an employee is a minor, the employee also may have the right to block parental access to the employee's protected health information in certain circumstances, if permitted by state law.

Employees may request restrictions on the use and disclosure of the employee's protected health information for the treatment, payment, and health care operations purposes explained in this policy. While the Benefit Plans will consider all requests for restrictions carefully, the Benefit Plans are not required to agree to a requested restriction.

Employees may ask to receive communications of their protected health information from the Benefit Plans by alternative means of communication or at alternative locations. While the Benefit Plans will consider reasonable requests carefully, they are not required to agree to all requests.

Employees may ask to inspect or to obtain a copy of their protected health information that is included in certain records the Benefit Plans maintain. Under limited circumstances, the Benefit Plans may deny employees access to a portion of their records. If employees request copies, the Benefit Plans may charge employees copying and mailing costs.

Employees have the right to ask the Benefit Plans to amend protected health information that is contained in the Benefit Plans records. If the Benefit Plans determine that the record is inaccurate, and the law permits the Benefit Plans to amend it, the Benefit Plans will correct it. If the employee's doctor or another person created the information that the employee wants to change, the employees should ask that person to amend the information.

Upon request, employees may obtain an accounting of disclosures the Benefit Plans have made of their protected health information. The accounting that the Benefit Plans provide will not include disclosures made before April 14, 2003, disclosures made for treatment, payment or health care operations, disclosures made earlier than six years before the date of the request, and certain other disclosures that are exempted by law. If employees request an accounting more than once during any 12-month period, the Benefit Plans will charge those employees a reasonable fee for each accounting statement after the first one.

Employees may contact the CEO to obtain a paper copy of this policy, even if the employees previously agreed to receive notices electronically. Employees must also contact the CEO if they wish to make any of the requests listed above.

If employees want more information about privacy rights, do not understand their privacy rights, are concerned that the Benefit Plans have violated their privacy rights, or disagree with a decision that the Benefit Plans made about access to protected health information, they may contact the CEO. Employees may also file written complaints with the Secretary of the U.S. Department of Health and Human Services. PrivateSky® will not take any action against employees if they file a complaint.

PrivateSky® Aviation Services, Inc.

Policy and Procedure Manual

PrivateSky® may change the terms of this policy at any time. If PrivateSky® changes this policy, PrivateSky® may make the new policy terms effective for all protected health information that the Benefit Plans maintain, including any information the Benefit Plans created or received before PrivateSky® issued the new policy. If PrivateSky® makes any changes to the Medical Information Privacy policy, notice of the changes will be provided to employees.

216 Social Security number policy

Effective Date: 01/01/2023
Revision Date: 01/01/2023

To protect employees' personal information, PrivateSky® prohibits the use of employees' Social Security numbers for identification purposes, except as allowed by law. PrivateSky® will not:

- * Publicly post or publicly display in any manner an employee's Social Security number. "Publicly post" or "publicly display" means to intentionally communicate or otherwise make available to the general public.
- * Print an employee's Social Security number on any card required for the employee to access products or services provided by PrivateSky®.
- * Require an employee to transmit his or her Social Security number over the Internet, unless the connection is secure or the Social Security number is encrypted.
- * Require an employee to use his or her Social Security number to access an Internet web site, unless a password or unique personal identification number or other authentication device is also required to access the Internet web site.
- * Print an employee's Social Security number on any materials that are mailed to the employee, unless state or federal law requires the Social Security number to be on the document to be mailed.

However, Social Security numbers may be included in applications and forms sent by mail, including documents sent as part of an application or enrollment process; or to establish, amend, or terminate an account, contract, or policy; or to confirm the accuracy of the Social Security number.

In instances where PrivateSky® previously used an employee's Social Security number in a manner inconsistent with this policy, it will continue using that employee's Social Security number in that manner, if all of the following conditions are met:

- * The use of the Social Security number is continuous. If the use is stopped for any reason, the conditions listed above will apply.
- * The employee is provided an annual disclosure that informs the employee that he or she has the right to stop the use of his or her Social Security number in a manner prohibited by those conditions listed above.

PrivateSky® Aviation Services, Inc.

Policy and Procedure Manual

A written request by an employee to stop the use of his or her Social Security number in a prohibited manner will be implemented within 30 days of the receipt of the request. There will be no fee or charge for implementing the request.

PrivateSky® will not deny services to an employee because the employee makes a written request to stop the use of his or her Social Security number.

PrivateSky® will continue to collect, use, or release Social Security numbers as required by state or federal law, and may use Social Security numbers for internal verification or administrative purposes.

Employees who have questions about this policy or who feel that their Social Security number has been used inappropriately by PrivateSky® should contact the COO.

280 Passports and Visas

Effective Date: 01/01/2023
Revision Date: 01/01/2023

When required, PrivateSky® will be responsible for the application and renewal for employee Passports and Visas as required for company travel abroad. PrivateSky® will bear the entire cost of the application process and fees associated with these procedures.

283 Assignment of Wages

Effective Date: 01/01/2023
Revision Date: 01/01/2023

Income executions, wage assignments and garnishments are legal procedures used by creditors to collect part of your pay from the company to satisfy certain personal debts. These procedures cause additional expense and an unnecessary burden on the company's accounting, payroll and clerical functions. Any charges for carrying out executions shall be a deduction from pay (minimum \$10 per week).

PrivateSky® Aviation Services, Inc.
Policy and Procedure Manual

301 Employee Benefits

Effective Date: 01/01/2023

Revision Date: 01/01/2023

Eligible employees at PrivateSky® are provided a wide range of benefits. A number of the programs (such as Social Security, workers' compensation, and unemployment insurance) cover all employees in the manner prescribed by law.

Benefits eligibility is dependent upon a variety of factors, including employee classification. Your supervisor can identify the programs for which you are eligible.

The following benefit programs are available to eligible employees:

- * Personal Business / Sick Leave
- * Bereavement Leave
- * Family Leave
- * Holidays
- * Jury Duty Leave
- * Medical Insurance
- * Uniform and Uniform Maintenance
- * Vacation Benefits
- * Voting Time Off

Full-time employees of PrivateSky® are also eligible to enroll in several different supplemental insurance policies that are offered through PrivateSky®, however, the employee is responsible for the entire premium. Please contact the Business Office for more information.

303 Vacation Benefits

Effective Date: 01/01/2023
Revision Date: 01/01/2023

Vacation time off with pay is available to eligible employees to provide opportunities for rest, relaxation, and personal pursuits. Employees in the following employment classification(s) are eligible to earn and use vacation time as described in this policy:

- * Regular full-time employees accrue vacation leave on a bi-weekly basis.
- * Upon completion of initial ninety (90) day eligibility, the employee accrues a rate of .83 days per month for the remainder of the year and will receive eighty (80) hours for each subsequent year.
- * After completion of five (5) years of consecutive full time employment, employees will receive an additional eight (8) hours of straight time pay for each year worked after the fifth year of employment up to a maximum of forty (40) additional hours. Example: End of Year 6, the employee would get 8 hours of straight time pay added to check, End of Year 10, the employee would get 40 hours of straight time pay added to their check. This is effective following the completion of their fifth consecutive year. Additional pay will be paid out in the year-end paycheck of the year in which it was earned to current employees that qualify.

For employees other than Introductory Full Time Employees, the vacation allotment accrual begins January 1 through December 31. The benefit year for Introductory Full Time Employees begins after completion of the initial ninety (90) day of Full Time employment.

To take vacation paid time off, employees should request advance approval (at least two weeks before a planned trip) from their supervisor. Vacation days can be taken in increments of eight (8) hours, with sufficient advance notice to allow the department to plan for your absence. Forty (40) hours may be taken when you have the time accrued. We prefer you not to take more than forty (40) hours at one time, but if this is needed because of an extended trip, please clear it with your supervisor as far in advance as possible to allot sufficient time for staffing considerations.

You may request your accrued vacation at any time during the year, subject to your supervisor's approval. Please keep in mind the seasonality of the business and plan vacations during off season (June-September) so all staffing needs are met. Your supervisor will schedule vacation in accordance with your wishes, so long as it is consistent with company policy and the requirements of the department's operation are met.

Excused Absence No Pay (EANP) can be utilized after all vacation and personal business/sick leave time has been used for the calendar year.

PrivateSky® Aviation Services, Inc.

Policy and Procedure Manual

Requests will be reviewed based on a number of factors, including business needs and staffing requirements.

Vacation time off is paid at the employee's base pay rate at the time of vacation. It does not include overtime or any special forms of compensation such as incentives, commissions, bonuses, or shift differentials.

As stated above, employees are encouraged to use available paid vacation time for rest, relaxation, and personal pursuits. In the event that available vacation is not used by the end of the benefit year, employees will not be paid for the accrued unused time. Accrued vacation time does not carry-over to the next year.

305 Holidays

Effective Date: 01/01/2023
Revision Date: 01/01/2023

PrivateSky® will grant holiday time off to all eligible employees on the holidays listed below:

- New Year's Day (January 1)
- Memorial Day (last Monday in May)
- Independence Day (July 4)
- Labor Day (first Monday in September)
- Thanksgiving (fourth Thursday in November)
- Christmas (December 25)

PrivateSky® will grant paid holiday time off to all eligible employees immediately upon assignment to an eligible employment classification. Holiday pay will be calculated based on the employee's straight-time pay rate (as of the date of the holiday) times the number of hours the employee would otherwise have worked on that day. Eligible employee classification(s):

Regular full-time employees

To be eligible for holiday pay, employees must work the last scheduled day immediately preceding and the first scheduled day immediately following the holiday unless prior approval is received for paid vacation time-off.

If eligible, non-exempt employees work on a recognized holiday, they will receive holiday pay plus wages at their straight-time rate for the hours worked on the holiday. Part Time Employees who work on a recognized holiday, will receive holiday pay plus wages at their straight-time rate for the hours worked on the holiday.

If eligible nonexempt employees work on a recognized holiday, they will receive holiday pay plus wages at one and one-half times their straight-time rate for the hours worked on the holiday.

Paid time off for holidays will be counted as hours worked for the purposes of determining overtime.

306 Workers' Compensation Insurance

Effective Date: 01/01/2023
Revision Date: 01/01/2023

PrivateSky® provides a comprehensive Workers' Compensation insurance program at no cost to employees. This program covers any injury or illness sustained in the course of employment that requires medical, surgical, or hospital treatment. Subject to applicable legal requirements, Workers' Compensation insurance provides benefits after a short waiting period or, if the employee is hospitalized, immediately.

Employees who sustain work-related injuries or illnesses should inform their supervisor immediately. No matter how minor an on-the-job injury may appear, it is important that it be reported immediately. This will enable an eligible employee to qualify for coverage as quickly as possible.

Neither PrivateSky® nor the insurance carrier will be liable for the payment of Workers' Compensation benefits for injuries that occur during an employee's voluntary participation in any off-duty recreational, social, or athletic activity sponsored by PrivateSky®.

307 Personal Business / Sick Leave Benefits

Effective Date: 01/01/2023
Revision Date: 01/01/2023

PrivateSky® provides paid Personal Business/Sick Leave benefits to all eligible employees for periods of temporary absence due to illnesses or injuries. Eligible employee classification(s):

* Regular full-time employees accrue Personal Business/Sick Leave on a bi-weekly basis.

Personal Business/Sick Leave benefits for eligible employees will be based at the rate of 1/2 day per month, up to maximum of forty (40) hours per calendar year. Personal Business/Sick leave benefits are calculated on the basis of a "benefit year," the period that begins when the employee starts to earn Personal Business/Sick leave benefits. For other than Introductory Employees, the "benefit year" is January 1 – December 31.

Introductory employees begin to earn Personal Business / Sick Leave benefits after the initial ninety (90) days upon becoming a Regular Full Time Employee, and will be based at the rate of 1/2 day per month for the remainder of the year and the employee will receive a maximum of forty (40) hours for each subsequent calendar year.

Paid sick leave can be used in minimum increments as little as one full hour, subject to your supervisor's approval. An eligible employee may use Personal Business/Sick leave benefits for an absence due to his or her own illness or injury, or that of a child, parent, or spouse of the employee.

Employees who are unable to report to work due to illness or injury should notify their direct supervisor personally four (4) hours before the start of their scheduled shift, except in the case of extenuating circumstances. The immediate supervisor must also be contacted on each additional day of absence. (See also Policy No. 704 - Attendance and Punctuality.)

If an employee is absent for three or more consecutive days due to illness or injury, a physician's statement must be provided verifying the disability and its beginning and expected ending dates.

PrivateSky® Aviation Services, Inc.

Policy and Procedure Manual

If an employee is absent for two or more consecutive days due to illness or injury, a physician's statement must be provided verifying the disability and its beginning and expected ending dates. Such verification may be requested for other sick leave absences as well and may be required as a condition to receiving sick leave benefits.

Before returning to work from a sick leave absence of two (2) calendar days or more, an employee must provide a physician's verification that he or she may safely return to work.

Personal Business/Sick leave benefits will be calculated based on the employee's base pay rate at the time of absence and will not include any special forms of compensation, such as incentives, commissions, bonuses, overtime or shift differentials.

As an additional condition of eligibility for Sick Leave benefits, an employee on an extended absence must apply for any other available compensation and benefits, such as Workers' Compensation or FMLA. Sick Leave benefits will be used to supplement any payments that an employee is eligible to receive from state disability insurance, Workers' Compensation or PrivateSky®-offered disability insurance programs. The combination of any such disability payments and sick leave benefits cannot exceed the employee's normal weekly earnings.

Personal Business/Sick Leave benefits are intended solely to provide income protection in the event of illness or injury. Any unused Personal Business / Sick Leave benefits still available at the end of the calendar year will be paid out to current full time employees.

Excused Absence No Pay (EANP) can be utilized after all vacation and personal business/sick leave time has been used for the calendar year.

308 Time Off to Vote

Effective Date: 01/01/2023

Revision Date: 01/01/2023

PrivateSky® encourages employees to fulfill their civic responsibilities by participating in elections. Generally, employees are able to find time to vote either before or after their regular work schedule. If employees are unable to vote in an election during their nonworking hours, PrivateSky® will grant up to one (1) hour of unpaid time off to vote.

Employees should request time off to vote from their supervisor at least two working days prior to the election day. Advance notice is required so that the necessary time off can be scheduled at the beginning or end of the work shift, whichever provides the least disruption to the normal work schedule.

Employees can also vote by mail to avoid unpaid time off.

309 Bereavement Leave

Effective Date: 01/01/2023
Revision Date: 01/01/2023

Employees who wish to take time off due to the death of an immediate family member should notify their supervisor immediately, who will notify the CEO.

Up to two (2) days of paid bereavement leave, per event, will be provided to eligible employees in the following classification(s):

- * Regular full-time employees

Bereavement pay is calculated based on the base pay rate at the time of absence and will not include any special forms of compensation, such as incentives, commissions, bonuses, overtime or shift differentials.

Bereavement leave will normally be granted unless there are unusual business needs or staffing requirements. Employees may, with their supervisors' approval, use any available paid leave for additional time off as necessary.

PrivateSky® defines "immediate family" as the employee's spouse, parent, child, sibling - step or half; the employee's spouse's parent or child, employee's son-in-law, daughter-in-law; employee's stepdaughter/stepson; employee's stepmother/stepfather; employee's grandparent/grandchild; employee's aunt or uncle; employee's legal guardian; any other person with the approval of the CEO. A copy of the obituary is required to receive paid time off benefits.

311 Jury Duty

Effective Date: 01/01/2023

Revision Date: 01/01/2023

PrivateSky® encourages employees to fulfill their civic responsibilities by serving jury duty when required. Employees in an eligible classification may request up to two (2) days of paid jury duty leave over any one (1) year period.

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 minus the amount of compensation received from the court up to a maximum of two (2) working days. Employee classifications that qualify for paid jury duty leave are:

- * Regular full-time employees

If employees are required to serve jury duty beyond the period of paid jury duty leave, they may use any available paid time off (for example, vacation benefits) or may request an unpaid jury duty leave of absence.

Employees must provide a copy of the jury duty summons to their supervisor prior to the court date so that the supervisor may make arrangements to accommodate their absence. Employees are expected to report for work whenever a full day's attendance at court is not required and there are two (2) or more work hours remaining on your shift. Failure to do so may result in loss of pay for the time in question.

When jury service is complete, you must request a VERIFICATION OF JURY SERVICE form from the court in which you served. The form must include dates served and amounts paid to you.

When you return to work, submit the VERIFICATION to your supervisor and payroll department. Payroll will reduce the gross wages in your next payroll check by the amount paid to you by the court. You do not have to pay federal or FICA taxes on jury duty earnings, and the company pays no FICA matching funds.

The Company will not make up the difference in your pay when you appear as a party in a legal proceeding.

Either PrivateSky® or the employee may request an excuse from jury duty if, in PrivateSky®'s judgment, the employee's absence would create serious operational difficulties.

PrivateSky® will continue to provide health insurance benefits for the full term of the jury duty absence for those employees currently enrolled.

Vacation, sick leave, and holiday benefits will not continue to accrue during unpaid jury duty leave.

313 Benefits Continuation (COBRA)

Effective Date: 01/01/2023

Revision Date: 01/01/2023

The federal Consolidated Omnibus Budget Reconciliation Act (COBRA) gives employees and their qualified beneficiaries the opportunity to continue health insurance coverage under PrivateSky®'s health plan when a "qualifying event" would normally result in the loss of eligibility. Some common qualifying events are resignation, termination of employment, or death of an employee; a reduction in an employee's hours or a leave of absence; an employee's divorce or legal separation; and a dependent child no longer meeting eligibility requirements.

Under COBRA, the employee or beneficiary pays the full cost of coverage at PrivateSky®'s group rates plus an administration fee. PrivateSky® provides each eligible employee with a written notice describing rights granted under COBRA when the employee becomes eligible for coverage under PrivateSky®'s health insurance plan. The notice contains important information about the employee's rights and obligations.

PrivateSky® Aviation Services, Inc.
Policy and Procedure Manual

316 Health Insurance

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Revision Date: 01/01/2023

PrivateSky® provides access to a health insurance plan for eligible employees and their dependents. Eligible employees may participate in the health insurance plan subject to all terms and conditions of the agreement between PrivateSky® and the insurance carrier.

After three (3) months of eligible service, an employee may enroll in the company health insurance program. This program is administered as a co-op program, wherein a portion of the monthly premium is paid by PrivateSky® and the remainder of the premium is paid by the employee as a payroll deduction. Employee Dependents' entire premiums are paid by the employee as a payroll deduction.

A change in employment classification that would result in loss of eligibility to participate in the health insurance plan may qualify an employee for benefits continuation under the Consolidated Omnibus Budget Reconciliation Act (COBRA). Refer to the Benefits Continuation (COBRA) Policy for more information.

Details of the health insurance plan are described in the Summary Plan Description (SPD). An SPD and information on cost of coverage will be provided in advance of enrollment to eligible employees. Contact the Business Office for more information about health insurance benefits.

380 Uniforms

Effective Date: 01/01/2023
Revision Date: 01/01/2023

Employees are required to maintain good habits for appearance and personal hygiene. Each employee should be neat and wear appropriate attire while working. Uniforms are mandatory for maintenance, customer service, and line personnel as supplied. Maintenance personnel, Line Service personnel and Tool Crib personnel must have shoes with safety toe protection. Open-toe shoes and sandals are prohibited. Socks are mandatory for maintenance, and line service personnel. Line service employees must wear steel, composite, or alloy safety toe shoes. Uniformed employees are to wear their uniforms with shirt-tails tucked into trousers. Under no circumstances are uniforms to be altered: i.e., sleeves cut-off, etc. Grooming is important because it affects the opinions of your co-workers and customers visiting our facility. Beards must be kept short and well-groomed. Mustaches must be kept neatly trimmed. Haircuts for men and women should reflect a professional and well-groomed appearance. The acceptable length of an employee's hair cannot compromise safety. All hats, when worn, must be PrivateSky® hats.

Certain Departments receive uniforms that are purchased and issued by PrivateSky® while certain Departments receive uniforms issued through a uniform service. These uniforms are to be kept clean and presentable for work by the employees they are issued to. **In the event an employee resigns or is terminated for cause at any time during first 180 days after issuance of the uniforms the retail value of the supplied uniforms will be deducted from the employee's final paycheck to defer the expense associated with short-term employment because of resignation or termination.** Once the 180-day employment time segment has elapsed from a uniform issuance period, a payroll uniform deduction is waived.

This policy will be reviewed periodically for appropriateness, and continuation will depend on everyone's commitment to demonstrate good judgment and project a businesslike professional image for our company at all times.

PrivateSky® Aviation Services, Inc.
Policy and Procedure Manual

401 Timekeeping

Effective Date: 01/01/2023

Revision Date: 01/01/2023

Accurately recording time worked is the responsibility of every employee. Federal and state laws require PrivateSky® to keep an accurate record of time worked in order to calculate employee pay and benefits. Time worked is all the time actually spent on the job performing assigned duties.

All non-exempt and exempt employees should clock in at the beginning of the assigned work shift, clock out at the end of the shift, as well as the beginning and ending time of each meal period if you leave company premises for lunch. Employees should also clock in at the beginning and clock out at the end of any split shift or departure from work for personal reasons. **Overtime work must always be approved before it is performed and the timecard must be initialed by your supervisor or the overtime will be considered unapproved and will not be paid.**

Altering, falsifying, tampering with timecard and/or records, or recording time on another employee's time record may result in disciplinary action, up to and including termination of employment.

Working through scheduled lunch periods does not constitute overtime unless such time has been approved by your supervisor's written documentation and approval on your timecard.

If you leave the property for any personal reason, (i.e., lunch, personal errands, doctor's appointments, etc.), you **MUST** clock out and clock back in upon your return, and clock out at the conclusion of your scheduled day. This time away, if not on company business, is unpaid time away.

403 Paydays

Effective Date: 01/01/2023

Revision Date: 01/01/2023

All non-exempt employees are paid biweekly on every other Thursday. Each paycheck will include earnings for all work performed through the end of the previous payroll period.

In the event that a regularly scheduled payday falls on a day off or holiday, employees will be paid on the day of work before or after the regularly scheduled payday.

If a regular payday falls during an employee's vacation, the employee's "live" paycheck will be available upon his or her return from vacation. Direct deposit will occur on the Thursday payday.

Employees will have pay directly deposited into their bank accounts, employee will provide advance written authorization to PrivateSky®. Employees will receive an itemized statement of wages when PrivateSky® makes direct deposits.

405 Employment Termination and/or Resignation

Effective Date: 01/01/2023

Revision Date: 01/01/2023

Termination of employment is an inevitable part of personnel activity within any organization, and many of the reasons for termination are routine. Below are examples of some of the most common circumstances under which employment is terminated:

- * Resignation - voluntary employment termination initiated by an employee.
- * Discharge - involuntary employment termination initiated by the organization.
- * Layoff - involuntary employment termination initiated by the organization for non-disciplinary reasons.

PrivateSky® will generally schedule exit interviews at the time of employment termination. The exit interview will afford an opportunity to discuss such issues as employee benefits, conversion privileges, repayment of outstanding debts to PrivateSky®, or return of PrivateSky®-owned property. Suggestions, complaints, and questions can also be voiced.

Since employment with PrivateSky® is based on mutual consent, both the employee and PrivateSky® has the right to terminate employment at will, with or without cause, at any time. Employees will receive their final pay check in accordance with applicable state law.

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. Some benefits may be continued at the employee's expense if the employee so chooses. The employee will be notified in writing of the benefits that may be continued and of the terms, conditions, and limitations of such continuance.

When an employee terminates, his/her supervisor will check tools against the tool inventory list. If tools are found during the inventory that are not on the employee's tool inventory list, the employee will be issued a receipt for the tool until the department and the Business Office determines its disposition. (See also Policy 590 - Personal Tools)

Any articles (including tools) which are left on the property of PrivateSky® by an employee at termination and unclaimed within thirty (30) days will be deemed "abandoned" and will become PrivateSky®'s property to dispose of as the company sees fit.

Resignation is a voluntary act initiated by the employee to terminate employment with PrivateSky®. Although advance notice is not required, PrivateSky® requests at least 2 weeks written resignation notice from all employees and be willing to train a new employee to fill the position being vacated. Prior to an employee's departure, an exit interview will be scheduled to discuss the reasons for resignation and the effect of the resignation on benefits.

409 Administrative Pay Corrections

Effective Date: 01/01/2023

Revision Date: 01/01/2023

PrivateSky® takes all reasonable steps to ensure that employees receive the correct amount of pay in each paycheck and that employees are paid promptly on the scheduled payday.

In the unlikely event that there is an error in the amount of pay, the employee should promptly bring the discrepancy to the attention of their supervisor so that corrections can be made as quickly as possible.

410 Pay Deductions and Setoffs

Effective Date: 01/01/2023

Revision Date: 01/01/2023

The law requires that PrivateSky® make certain deductions from every employee's compensation. Among these are applicable federal, state, and local income taxes. PrivateSky® also must deduct Social Security taxes on each employee's earnings up to a specified limit that is called the Social Security "wage base." Also required by law, PrivateSky® matches the amount of Social Security taxes paid by each employee.

PrivateSky® offers programs and benefits beyond those required by law. Eligible employees may voluntarily authorize deductions from their paychecks to cover the costs of participation in these programs.

Pay setoffs are pay deductions taken by PrivateSky®, usually to help pay off a debt or obligation to PrivateSky® or others. (See also Policy No. 283 - Assignment of Wages)

If you have questions concerning why deductions were made from your paycheck or how they were calculated, contact the Business Office to have your questions answered.

PrivateSky® Aviation Services, Inc.

Policy and Procedure Manual

501 Safety

Revision Date: 01/01/2023

Effective Date: 01/01/2023

To assist in providing a safe and healthy work environment for employees, customers, and visitors, PrivateSky® has established a workplace safety program - "Safety First". This program is a top priority for PrivateSky®. The COS has responsibility for implementing, administering, monitoring, and evaluating the safety program. Its success depends on the alertness and personal commitment of all.

PrivateSky® provides information to employees about workplace safety and health issues through regular internal communication channels such as supervisor-employee meetings, bulletin board postings, memos, or other written communications.

The company supplies safety equipment for all jobs when considered necessary. When a job must be performed and the use of safety equipment will lessen the possibility of injury, the equipment must be used. Your supervisor will advise you of the required equipment and where to obtain it. In general, safety equipment is available from the tool room. All line or maintenance employees must wear steel, composite, or alloy safety toe shoes.

Employees and supervisors receive periodic workplace safety training. The training covers potential safety and health hazards and safe work practices and procedures to eliminate or minimize hazards.

Each employee is expected to obey safety rules and to exercise caution in all work activities. Employees must immediately report any unsafe condition to the appropriate supervisor. Employees who violate safety standards, who cause hazardous or dangerous situations, or who 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 accidents that result in injury, regardless of how insignificant the injury may appear, employees should immediately notify the appropriate supervisor or COS. Such reports are necessary to comply with laws and initiate insurance and workers' compensation benefits procedures.

In the event of any accident, disaster, or any other incident at or off the facility related to PrivateSky®, the first place to call if imminent danger or life safety is involved would be the airport fire or police department 239-590-4810 or 911. Immediately after this call is made, the next call is to the COS. No one is to talk to any press or media and all contacts with the media or press or anyone are to be handled by the CEO. In the event that the CEO is not available, then the Chairman or designated appointee shall be the next point of contact.

Urgent treatment should be administered at the emergency room of the nearest healthcare facility. Call 911 and make sure to state we are at RSW SW Florida International Airport at the PrivateSky Aviation Services, Inc.

If you witness an accident or condition that could conceivably result in injury or property damage, it is your responsibility to report it to your supervisor. Failure to report a work related injury or illness might result in corrective action.

PrivateSky® Aviation Services, Inc.
Policy and Procedure Manual

502 Work Schedule

Effective Date: 01/01/2023
Revision Date: 01/01/2023

The PrivateSky® facility workweek runs from Sunday to Saturday for accounting purposes. Facility hours are from 6:00 a.m. (06:00) to 10:00 p.m (22:00). We are open every day of the year.

The normal work schedule for most employees is 8 hours a day, 5 days a week. Since starting times may vary, supervisors will advise employees of the times their schedules will normally begin and end. Staffing needs and operational demands may necessitate variations in starting and ending times, as well as variations in the total hours that may be scheduled each day and week. A shift is typically defined as eight (8) consecutive hours.

504 Use of Phone and Mail Systems

Effective Date: 01/01/2023
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PrivateSky® discourages personal calls made and received during the work day as this interferes with productivity. Calls of a personal nature should be handled before or after the assigned shift or during the lunch or break period. Personal use of the phone for long-distance and toll calls is not permitted. The use of PrivateSky®-paid postage for personal correspondence is not permitted. Personal cell phones are not permitted for use during the work shift.

To ensure effective phone communications, employees should always use the approved greeting and speak in a courteous and professional manner when answering business related calls.

Incoming Approved Greeting: "Thank you for calling PrivateSky®. This is (name), how may I help you.

Transferred call: "This is (name)."

505 Smoking / Vaping / Chewing Tobacco / Etc.

Effective Date: 01/01/2023

Revision Date: 01/01/2023

Smoking, vaping, chewing tobacco, etc., and the use of any tobacco products, including electronic cigarettes, are prohibited anywhere on PrivateSky® property effective as of February 14, 2017. A violation of this policy is a serious offense and will not be tolerated. Employees who have a desire to quit smoking should contact the HR Department.

506 Rest and Meal Periods

Effective Date: 01/01/2023

Revision Date: 01/01/2023

To the extent possible, each workday, full-time nonexempt and exempt employees are provided with 2 rest periods of 15 minutes in length. To the extent possible, rest periods will be provided in the middle of work periods. Since this time is counted and paid as time worked, employees must not be absent from their workstations beyond the allotted rest period time.

To the extent possible, all full-time regular employees are provided with one meal period of 30 in length each workday. Supervisors will schedule meal periods to accommodate operating requirements. Employees will be relieved of all active responsibilities and restrictions during meal periods and will not be compensated for that time.

507 Overtime

Effective Date: 01/01/2023
Revision Date: 01/01/2023

When operating requirements or other needs cannot be met during regular working hours, employees will be given the opportunity for overtime work assignments. All overtime work must receive the supervisor's prior authorization. Overtime assignments will be distributed as equitably as practical to all employees qualified to perform the required work.

Overtime compensation is paid to all nonexempt employees in accordance with federal and state wage and hour restrictions. Some exempt employees can get OT if they make \$40K or less. Overtime pay is based on actual hours worked in any one week. Time off for sick leave, vacation leave, or any leave of absence will not be considered hours worked for purposes of performing overtime calculations. Paid time off for holidays will be counted as hours worked for the purposes of determining overtime. It is possible to work more than eight (8) hours per day and less than eight (8) hours on another day, but the total of more than forty (40) hours per week is what constitutes the basis for payment of overtime.

The supervisor giving the approval for overtime must initial the time card of the employee and include any necessary documentation. Overtime rates are paid at time and a half for all time in excess of forty (40) hours of authorized work each week. While it is possible to make up lost time from one day to the next, with your supervisor's approval, it is not possible to make up time from one calendar week to the next. **Employees who work overtime without receiving prior authorization from the supervisor may be subject to disciplinary action, up to and including possible termination of employment.**

NOTE: Clocking in prior to your scheduled start time or after your scheduled stop time and/or working through scheduled lunch periods does not constitute overtime unless such time has been approved by your supervisor and your time card initialed by your manager or supervisor.

Notwithstanding anything to the contrary, company Base Rate paid employees are not paid hourly and therefore this paragraph does not apply.

Before timecards are submitted to the Business Office at the end of the workweek, the manager or supervisor must have previously authorized and initialed the employee's timecard for any overtime or any absence during the workday. Any overtime not initialed by the supervisor will be considered unauthorized and the employee will not be paid for this time.

508 Use of Equipment and Vehicles

Effective Date: 01/01/2023

Revision Date: 01/01/2023

Equipment and vehicles essential in accomplishing job duties are expensive and may be difficult to replace. When using Company property, employees are expected to exercise care, perform required maintenance, and follow all operating instructions, safety standards, and guidelines.

Please notify the supervisor and COS if any equipment, machines, tools, or vehicles appear to be damaged, defective, in need of repair or if repair tags are required. Prompt reporting of damages, defects, and the need for repairs could prevent deterioration of equipment and possible injury to employees or others. The supervisor and COS can answer any questions about an employee's responsibility for maintenance and care of equipment or vehicles used on the job.

The improper, careless, negligent, destructive, or unsafe use or operation of equipment or vehicles, as well as excessive or avoidable traffic and parking violations, can result in disciplinary action, up to and including termination of employment.

510 Emergency Closings

Effective Date: 01/01/2023

Revision Date: 01/01/2023

At times, emergencies such as severe weather, fires, power failures, hurricanes, tornadoes, floods, or earthquakes, can disrupt company operations. In extreme cases, these circumstances may require the closing of a work facility. Employees may request available paid leave time such as unused vacation benefits.

In cases where an emergency closing is not authorized, employees who fail to report for work will not be paid for the time off.

512 Business Travel Expenses

Effective Date: 01/01/2023

Revision Date: 01/01/2023

PrivateSky® will reimburse employees for reasonable business travel expenses incurred while on assignments away from the normal work location. All business travel must be approved in advance by the CEO.

When approved, the actual costs of travel, meals, lodging, and other expenses directly related to accomplishing business travel objectives will be reimbursed by PrivateSky®. Employees are expected to limit expenses to reasonable amounts.

Expenses that generally will be reimbursed include the following:

- Airfare or train fare for travel in coach or economy class or the lowest available fare. Car rental fees only for compact or mid-sized cars.

- Fares for shuttle or airport bus service, where available; costs of public transportation for other ground travel.

- Taxi fares, or rideshare fares (Uber, Lyft, etc.), only when there is no less expensive alternative.

- Mileage costs for use of personal cars, only when less expensive transportation is not available.

- Cost of standard accommodations in low to mid-priced hotels, motels, or similar lodgings.

- Accommodations should be coordinated through the Business Office.

- Any upgrades are the responsibility of the employee. In-house movies, mini-bar charges, phone calls (local or long distance), and gift shop purchases are the sole responsibility of the employee.

- Reasonable cost of meals (excluding alcohol). Alcohol will not be reimbursed.

- Non-travel day meal expenses will be per diem in accordance with the U.S. General Services Administration domestic per diem rates as identified on www.gsa.gov. Receipts are not required for per diem days.

- Tips not exceeding 15% of the total cost of a meal or 10% of a taxi fare.

- Charges for phone calls, fax, and similar services required for business purposes.

- Charges for one personal phone call each day.

- Charges for laundry and valet services, only on trips of six or more business days. (Personal entertainment and personal care items are not reimbursed.)

PrivateSky® Aviation Services, Inc.

Policy and Procedure Manual

Employees who are involved in an accident while traveling on business must promptly report the incident to their immediate supervisor. Vehicles owned, leased, or rented by PrivateSky® may not be used for personal use without prior approval.

Cash advances to cover reasonable anticipated expenses may be made to employees after travel has been approved. Employees should submit a written request to their supervisor when travel advances are needed.

When travel is completed, employees should submit completed travel expense reports within three (3) business days to the Business Office. Reports should be accompanied by receipts for all individual expenses must include the dates, name of establishments (hotel or restaurant), nature of business conducted, and names and business affiliates of those present. Reimbursement for charges where no receipt has been provided will be paid at the sole discretion of the CEO.

Employees should contact their supervisor for guidance and assistance on procedures related to travel arrangements, travel advances, expense reports, reimbursement for specific expenses, or any other business travel issues.

Abuse of this business travel expenses policy, including falsifying expense reports to reflect costs not incurred by the employee, can be grounds for disciplinary action, up to and including termination of employment.

514 Visitors in the Workplace

Effective Date: 01/01/2023

Revision Date: 01/01/2023

To provide for the safety and security of employees and the facilities at PrivateSky®, only authorized visitors are allowed in the workplace. Restricting unauthorized visitors helps maintain safety standards, protects against theft, ensures security of equipment, protects confidential information, safeguards employee welfare, and avoids potential distractions and disturbances.

Security and/or FBO Supervisors will issue all non-employee/visitor badges and these badges must be worn while on company premises. Any visitor (other than customers issued a customer's badge, contract laborers, and outside contractors working on a given project) must be escorted at all times while on company property. Employees performing escort duties must keep the escorted person(s) in visual contact at all times.

If you are assigned to escort a visitor, your responsibilities include:

- * Keep the escorted person in visual contact at all times
- * Assure that the escorted person does not get into an unsafe situation

Because of safety and security reasons, family and friends of employees are encouraged to visit during off-duty hours. In cases of emergency, employees will be called to meet any visitor outside their work area.

All visitors should enter PrivateSky® at the lobby. Authorized visitors will receive directions or be escorted to their destination. Employees are responsible for the conduct and safety of their visitors.

All visitors entering the hangar are required to follow company policy that shoes must provide safe, secure footing, and offer protection against hazards. No flip-flops, sneakers, or bare feet are permitted.

If an unauthorized individual is observed on PrivateSky®'s premises, employees should immediately notify their supervisor or, if necessary, direct the individual to the lobby.

NOTE: Paparazzi are not permitted at any time on the premises of PrivateSky®. A violation of this policy will be deemed as trespassing and will result in removal by the local law enforcement. When celebrities, athletes, political representatives are present, no information is to be given. None of these people are to be asked for a photo, tickets, autographs, or to be approached outside of doing your work task. Termination will result for violation of this rule.

PrivateSky® Aviation Services, Inc.
Policy and Procedure Manual

516 Computer and e-mail Usage

Effective Date: 01/01/2023

Revision Date: 01/01/2023

Computer hardware and related accessories, peripherals, all local and wide area data communications networks and all software owned by or licensed to PrivateSky® Aviation Services, Inc. or installed on computer hardware owned by PrivateSky® Aviation Services, Inc. are considered assets of PrivateSky® Aviation Services, Inc.

Any and all information (data) created or stored on PrivateSky®'s computer assets or transmitted (communicated) on or by using PrivateSky®'s computer assets is considered computer data of PrivateSky® Aviation Services, Inc.

PrivateSky® Aviation Services, Inc.'s computer assets and the information contained herein are essential to daily operations and to the future competitive strength of the company. Therefore, information security is a very serious issue. All persons using PrivateSky®'s computer assets shall adhere to the highest standards of professionalism and are charged with the obligation to protect and secure terminals when unattended using appropriate log-out procedures and avoid engaging in any activity that could damage or create malfunctions to PrivateSky®'s computer assets or data. PrivateSky®'s computer assets or data shall not be removed, copied, or destroyed, except for deletion of files and other data while performing job duties.

All persons using PrivateSky®'s computer assets are charged with the obligation to protect confidential, restricted and PrivateSky®'s operations critical information which is a part of PrivateSky®'s computer data. The unauthorized use of dissemination of proprietary information and trade secret information, regardless of the method of use or dissemination is a violation of this company policy and may lead to termination. Serious violations will be grounds for criminal prosecution.

PrivateSky®'s assets may be used for conducting company business only. All personal use of such assets is prohibited. Violations of this will result in termination.

Computers, computer files, the e-mail system, and software furnished to employees are PrivateSky®'s property intended for business use. Employees should not use a password, access a file, or retrieve any stored communication without authorization. To ensure compliance with this policy, computer and e-mail usage of PrivateSky®'s computer assets and computer data may be monitored for any reason at any time, include reviewing any and all e-mail messages, and using the results of such monitoring to enforce this policy. Violations of this policy will be subject to disciplinary action up to and including termination of employment.

PrivateSky® Aviation Services, Inc

Policy and Procedure Manual

No employee is allowed to "share" his or her password or system security details with any other employee or unauthorized person, except as may be required in the performance of a particular job. If you are required to access a computer in your job, your supervisor will help you follow proper channels to establish user IDs and passwords. Giving your password or system security details to any other employee or any unauthorized person is grounds for corrective action.

PrivateSky® strives to maintain a workplace free of harassment and sensitive to the diversity of its employees. Therefore, PrivateSky® prohibits the use of computers and the e-mail system in ways that are disruptive, offensive to others, or harmful to morale.

For example, the display or transmission of sexually explicit images, messages, literature, language, suggestive pictures, cartoons or the like is not allowed. Other such misuse includes, but is not limited to, ethnic slurs, racial comments, off-color jokes, chain letters, unlawful or illegal use (pyramid schemes, etc.) or anything that may be construed as harassment or showing disrespect for others whether or not shared with another PrivateSky® employee.

Accessing events that impose large demands on the network and potentially degrade performance for all users, such as non-business related audio or video events (i.e. internet radio, television or movie clips), or other copyrighted materials is prohibited. Facebook, Instagram, Tik Tok, Indeed, YouTube, etc., are never to be used or accessed at work.

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

The e-mail system of PrivateSky® is a PrivateSky® Aviation Services, Inc. computer asset, and the messages created in this system are considered PrivateSky® Services, Inc. data. The email system is not a private means of communication and should not be used to transmit sensitive, confidential, or obscene information. Any e-mail content can be subpoenaed by a court of law and used as evidence in a legal proceeding.

PrivateSky® 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, PrivateSky® does not have the right to reproduce such software for use on more than one computer use in any manner inconsistent with the license agreement, or use any software that is designed to destroy data or disrupt computing processes in any way.

Employees may not load any software on PrivateSky®'s computer assets without management permission (including free demonstration or evaluation versions of software).

Employees may not circumvent PrivateSky®'s security controls or systems or have administrator privileges for information technology equipment or software unless specifically authorized by the CEO or Chairman.

PrivateSky® Aviation Services, Inc

Policy and Procedure Manual

Employees may only use software on local area networks or on multiple machines according to the software license agreement. PrivateSky® prohibits the illegal duplication of software and its related documentation.

Employees should notify their immediate supervisor, COO or any member of senior management upon learning of violations of this policy. Employees who violate this policy will be subject to disciplinary action, up to and including termination of employment.

517 Internet Usage

Effective Date: 01/01/2023
Revision Date: 01/01/2023

Internet access to global electronic information resources on the World Wide Web is provided by PrivateSky® to assist employees in obtaining work-related data and technology. The following guidelines have been established to help ensure responsible and productive Internet usage.

All Internet data that is composed, transmitted, or received via our computer communications systems is considered to be part of the official records of PrivateSky® and, as such, is subject to disclosure to law enforcement or other third parties. Consequently, employees should always ensure that the business information contained in Internet e-mail messages and other transmissions is accurate, appropriate, ethical, and lawful.

The equipment, services, and technology provided to access the Internet remain at all times the property of PrivateSky®. As such, PrivateSky® reserves the right to monitor Internet traffic, and retrieve and read any data composed, sent, or received through our online connections and stored in our computer systems.

Data that is composed, transmitted, accessed, or received via the Internet must not contain content that could be considered discriminatory, offensive, obscene, threatening, harassing, intimidating, or disruptive to any employee or other person. Examples of unacceptable content may include, but are not limited to, sexual comments or images, racial slurs, gender-specific comments, or any other comments or images that could reasonably offend someone on the basis of race, age, sex, religious or political beliefs, national origin, disability, sexual orientation, or any other characteristic protected by law.

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.

PrivateSky® Aviation Services, Inc Policy and Procedure Manual

Internet users should take the necessary anti-virus precautions before downloading or copying any file from the Internet. All downloaded files are to be checked for viruses and all compressed files are to be checked before and after decompression.

Abuse of the Internet access provided by PrivateSky® in violation of law or PrivateSky® policies will result in disciplinary action, up to and including termination of employment. Employees may also be held personally liable for any violations of this policy. 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
- * Using the organization's time and resources for personal gain
- * 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, trademark, and/or patents laww
- * 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
- * Jeopardizing the security of the organization's electronic communications systems
- * Sending or posting messages that disparage another organization's products or services
- * Passing off personal views as representing those of the organization
- * Sending anonymous e-mail messages
- * Engaging in any other illegal activities
- * Use of the Internet to conduct illegal activities will be reported to the appropriate law enforcement agency
- * Use of the system to access Facebook, Instagram, Tik Tok, YouTube, Indeed, online games, etc., is considered abuse.

518 Workplace and Facilities Monitoring

Effective Date: 01/01/2023

Revision Date: 01/01/2023

Workplace monitoring may be conducted by PrivateSky® to ensure quality control, employee safety, security, and customer satisfaction.

Computers furnished to employees are the property of PrivateSky®. As such, computer usage and files may be monitored or accessed.

PrivateSky® conducts video surveillance of all non-private workplace areas. Video monitoring is used to identify safety concerns, maintain quality control, detect theft and misconduct, and discourage or prevent acts of harassment, workplace violence, terrorism, and criminal activity.

Employees can request access to information gathered through workplace monitoring that may impact employment decisions. Access will be granted unless there is a confidential business reason in the sole discretion of PrivateSky® to protect confidentiality or an ongoing investigation.

Because PrivateSky® is sensitive to the legitimate privacy rights of employees an effort intends that monitoring is done in a respectful manner.

The entire PrivateSky® is posted as to no trespassing and video surveillance recording for transparency

522 Workplace Violence Prevention

Effective Date: 01/01/2023

Revision Date: 01/01/2023

PrivateSky® is committed to preventing workplace violence and to maintaining a safe work environment. Given the increasing violence in society in general, PrivateSky® has adopted the following guidelines to deal with intimidation, harassment, or other threats of (or actual) violence that may occur during business hours or on its premises.

All employees, including supervisors and temporary employees, should be treated with courtesy and respect at all times. Employees are expected to refrain from fighting, "horseplay," or other conduct that may be dangerous to others. Firearms, weapons, and other dangerous or hazardous devices or substances are prohibited from the premises of PrivateSky® or PrivateSky®'s vehicles without proper authorization in writing from the CEO, COS, Chariman of the facility. Authorized law enforcement agents on official business who present proper identification, will be permitted to carry handguns on company premises.

Conduct that threatens, intimidates, or coerces another employee, a customer, or a member of the public at any time, including off-duty periods, will not be tolerated. This prohibition includes all acts of harassment, including harassment that is based on an individual's sex, race, age, or any characteristic protected by federal, state, or local law.

All threats of (or actual) violence, both direct and indirect, should be reported as soon as possible to your immediate supervisor or any other member of management. This includes threats by employees, as well as threats by customers, vendors, solicitors, or other members of the public. When reporting a threat of violence, you should be as specific and detailed as possible.

All suspicious individuals or activities should also be reported as soon as possible to a supervisor. Do not place yourself in peril. If you see or hear commotion or a disturbance near your workstation, do not try to intercede or see what is happening.

PrivateSky® will promptly and thoroughly investigate all reports of threats of (or actual) violence and of suspicious individuals or activities. The identity of the individual making a report will be protected as much as is practical. In order to maintain workplace safety and the integrity of its investigation, PrivateSky® may suspend or terminate employees, either with or without pay, pending, or without any investigation.

Anyone determined to be responsible for threats of (or actual) violence or other conduct that is in violation of these guidelines will be subject to prompt disciplinary action up to and including termination of employment.

PrivateSky® encourages employees to bring their disputes or differences with other employees to the attention of their supervisors or the CEO or COS before the situation escalates into potential violence. PrivateSky® is eager to assist in the resolution of employee disputes, and will not discipline employees for raising such concerns.

523 Active Shooter Policy

Effective Date: 01/01/2023
Revision Date: 01/01/2023

Objective: To assist employees in responding to an active shooter event.

Definitions:

Active Shooter- An active shooter is defined as “..an individual(s) actively engaged in killing or attempting to kill people in confined and populated area”. In most cases, active shooters use firearm(s) and there is no pattern or method to their selection of victims.

Policy:

In order to preserve life and address the reality of an active shooter event, these guidelines have been established to guide our response to maximize survivability. Most importantly, quickly determine the most reasonable way to protect your own life.

Procedures:

- I. The intent of most active shooters is to kill as many people as quickly as possible. Traditional law enforcement response will include the concept of “surround and capture” in order to minimize the number of victims. In order to save lives, the law enforcement agency having jurisdiction will initiate an immediate response.
- II. Upon discovery of an active shooter situation, as soon as possible and when safe to do so, notify law enforcement and/or 911 announcement of a Code Silver or “Active Shooter” and location.
 - A. The phone call 239-590-4810 (Lee County Port Authority) and/or 911 (from area where they are safely concealed) should provide the following information:
 1. Description of suspect and possible location
 2. Number and types of weapons
 3. Suspect’s direction and travel
 4. Location and condition of any victims
- III. The Manager in Charge (MIC) will meet and guide law enforcement officers if possible and as appropriate. The goal of law enforcement is to locate, isolate, and neutralize the shooter as quickly as possible to prevent additional deaths or injuries.

PrivateSky® Aviation Services, Inc
Policy and Procedure Manual

IV. Response:

A. Evacuate – If there is an accessible escape path, attempt to evacuate the premises. Be sure to:

1. Have an escape route and plan in mind
2. Evacuate regardless of whether others agree to follow
3. Leave your belongings behind
4. Help others escape if possible
5. Prevent individuals from entering an area where the active shooter may be
6. Keep your hands visible
7. Follow the instructions of any police officers
8. Do no attempt to move wounded people
9. Call 239-590-4810 (Lee County Port Authority)and/or 911 when you are safe

B. Hide out – If evacuation is not possible, find a place to hide where the active shooter is less likely. Direct personnel into LOCKABLE rooms, CLOSE, LOCK, and BARRICADE the door.

1. Your hiding place should:

- a) Be out of the active shooter's view
- b) Provide protection if shots are fired in your direction (i.e., location into a bathroom and locking the door, stay as low to the floor as possible and remain quiet and still)
- c) Not to trap and restrict your options for movement

2. To prevent an active shooter from entering your hiding place:

- a) Lock the door
- b) Blockade the door with heavy furniture

3. If the active shooter is nearby:

- a) Lock the door
- b) Silence your cell phone
- c) Turn off any sources of noise (i.e., radios, televisions)
- d) Hide behind large items (i.e., cabinets, desks)
- e) Remain quiet

4. If evacuation and hiding out are not possible:

- a) Remain calm
- b) Dial 239-590-4810 (Lee County Port Authority) and/or 911, if possible, to alert police to the active shooter's location
- c) If you cannot speak, leave the line open and allow the dispatcher to listen

5. Take action against the active shooter as a last resort, and only when your life is in imminent danger. Attempt to disrupt and/or incapacitate the active shooter by:

PrivateSky® Aviation Services, Inc
Policy and Procedure Manual

- a) Acting as aggressively as possible against him/her
 - b) Throwing items and improvising weapons
 - c) Yelling or screaming with anger as loud as possible
 - d) Committing to your actions to defend yourself
- V. An “all clear” Code Silver will be announced overhead when the situation has been addressed and the scene is declared safe by law enforcement officials.
- VI. Recovery:
- A. Share information with employees. The health and wellbeing of our employees is critical. As soon as possible after law enforcement has relinquished Command and Control of the scene, the Manager in Charge (MIC), CEO and/or COS will develop information strategies to address employee and family questions to the event. Initially, the site of a violent incident will be secure as a crime scene. After the authorities have completed their investigation and have released the crime scene, management will need to have the facility appropriately cleaned and sanitized. Clean-up for the safe removal of bio-hazardous substances including blood borne pathogens must take place, yet must be sensitive, compassionate, and caring for the deceased.
 - B. Buffer those affected from Post-Event Stresses. Effective coordination with the media and timely dissemination of information can help reduce media pressure on those who are the most vulnerable. Assistance with employee benefits and other administrative issues can reduce the burden of victims and families. The CEO and the Brand Department will be designated as the Public Information Office that is the only authorized departments that is to speak on behalf of the facility to the media.

PrivateSky® Aviation Services, Inc

Policy and Procedure Manual

526 Mobile Phone Usage

Effective Date: 01/01/2023

Revision Date: 01/01/2023

PrivateSky® provides mobile phones to some employees as a business tool as determined by the senior management staff. They are provided to assist employees in communicating with management and other employees, their clients, associates, and others with whom they may conduct business. Cell phone use is intended for business-related calls. Cell phone invoices are regularly monitored. Employees will be responsible for their mobile charges over and above the established monthly provider agreement unless the CEO approves the excess charges.

Employees issued mobile phones are responsible for the care, custody and control of their mobile phone, and any repair and/or replacement will be coordinated through PrivateSky®. Any costs associated with the repair and/or replacement of a mobile phone as a result of negligence or intentional harm will be the employee's responsibility.

Employees may have access to a cell phone while in their cars and should remember that their primary responsibility is driving safely and obeying the rules of the road. Employees are prohibited from using cell phones to conduct business while driving and should safely pull off the road and come to a complete stop before dialing or talking on the phone.

As a representative of PrivateSky®, cell phone users are reminded that the regular business etiquette employed when speaking from office phones or in meetings applies to conversations conducted over a cell phone.

580 Company Issued Credit Cards

Effective Date: 01/01/2023

Revision Date: 01/01/2023

PrivateSky® provides company credit cards to management personnel and certain employees deemed to have a need for such credit card. Any company issued credit card is the property of PrivateSky® and as such is to be used for business purposes only. NO personal items are to be purchased using a company issued credit card for any reason, unless prior approval by the senior management has been received. All persons holding a company issued credit card are REQUIRED to obtain a receipt for each use of the credit card and provide the receipt(s), along with a completed expense report, to the Business Office within five (5) days of each use.

Reimbursement for any charge for which no receipt or documentation is submitted is at the sole discretion of the CEO. Senior management has the right to demand the return of such company issued credit card at any time and for any reason.

583 Facility and Property Security

Effective Date: 01/01/2023

Revision Date: 01/01/2023

PrivateSky® personnel will be used to control and patrol access to all facilities including parking lots, ramp and hangar areas. All customers can be asked and must produce a photo ID and proof of interest in a particular aircraft before being allowed on the ramp or anywhere in the facility.

PrivateSky® will require flight crews to identify all passengers in the PrivateSky® Customer Service area prior to customer access to ramp and aircraft.

All passengers and visitors will be escorted by PrivateSky® personnel should it be determined there is a need to be outside the PrivateSky® terminal, on the ramp or in the hangar areas. No one will be allowed to linger on the ramp unescorted at any time.

All cars parked in the PrivateSky® parking lot must have a parking permit displayed on the dash, visible through the windshield. Any vehicles without a property permit displayed will be towed from the facility at the expense of the owner. All PrivateSky® personnel are required to park in the designated employee parking area.

584 Cost Consciousness

Effective Date: 01/01/2023

Revision Date: 01/01/2023

You are responsible to keep costs in your department(s) to a minimum. The aircraft industry is highly competitive and costs savings are vital to PrivateSky®'s ability to successfully service the needs of its customers. Your job can depend on your ability and action to:

- Conserve utilities, supplies and equipment
- Follow the guidelines of quality improvement
- Initiate new cost-effective ideas and share them with your supervisor or the CEO

PrivateSky® Aviation Services, Inc

Policy and Procedure Manual

587 Parking

Effective Date: 01/01/2023

Revision Date: 01/01/2023

The company maintains a parking area where employees are to park their vehicle during working hours. Employees will be issued a PrivateSky® decal for display in the lower left area of the vehicle windshield as proper identification as a PrivateSky® employee. Disabled or temporarily disabled employees are authorized to park in the customer parking lot or on ramp by client cars subject to prior approval from the CEO. Some areas are reserved or restricted and have been assigned for use by specific individuals. Personal vehicles are not allowed on the secured ramp or inside any hangar facility, unless CEO, COS, or Chairman gives prior approval.

The company takes precautions to protect individual's property, but cannot assume responsibility for the theft or damage to cars or their contents while on company property. A safeguard against such loss is to store valuable items in the car trunk and ensure that your car is locked at all time with no keys in the vehicle.

588 Training & Training Costs

Effective Date: 01/01/2023

Revision Date: 01/01/2023

We work in a high technology industry and must stay aware of the many technical changes taking place. As such, the company's policy of TOTAL EXCELLENCE™ has created the demand for higher levels of proficiency in trades common to us. Employee training to stay abreast of the latest in technology advancements is paramount and will require that certain employees participate in periodic recurrent training and training in new areas.

The training provided by the company provides for such personnel and is done by outside training companies and, in most cases, is costly. Any employee who receives such training will be required to sign a contract that provides if the employee elects to leave the company within a twelve (12) month period after the training the employee will be required to reimburse the total cost of such training to the company.

589 Changes in Assignment

Effective Date: 01/01/2023

Revision Date: 01/01/2023

In pursuing business objectives, it is sometimes necessary to change an employee's assignment in order to use his or her particular skills to the greatest advantage. This may mean a transfer to another department, another job or another shift. Although the company does not change an employee's assignment indiscriminately, it does reserve the right to make changes to meet business requirements.

590 Personal Tools

Effective Date: 01/01/2023

Revision Date: 01/01/2023

In order to prevent personal and company tool losses, on the first day of employment, you and your supervisor/manager will conduct an inventory of the personal tools and material you brought into the company. This tool inventory list will be maintained in your department and kept in your personnel file. **NOTE:** It is imperative that new employees see their supervisor for the required minimum tool equipment list. Whenever you bring additional personal tools into the company after the initial inventory has been conducted, they must be added to your tool inventory list at the beginning of your shift. If a tool is lost, broken or damaged, you must inform your manager. If the tool will be replaced, the broken/damaged tool must be deleted from the tool inventory list and the replacement tool must be added to the list. It is the responsibility of each employee to ensure that his or her toolbox is locked when not in use. You are responsible for keeping your tool inventory up-to-date. Any deviation from the above procedures could result in losing tools in question and/or corrective action.

When an employee terminates, his/her supervisor will check tools against the tool inventory list. If tools are found during the inventory that are not on the employee's tool inventory list, the employee will be issued a receipt for the tool until the department and Security determines its disposition.

Any articles (including tools) which are left on the property of PrivateSky® by an employee at termination and unclaimed within thirty (30) days will be deemed "abandoned" and will become PrivateSky®'s property to dispose of as the company sees fit.

591 Personal Radios

Effective Date: 01/01/2023

Revision Date: 01/01/2023

Radios and similar personal stereo and other electronic devices are not permitted at PrivateSky® except with the approval from their Manager or Supervisor and signed off by COS. Internet Radio is not allowed. (See also Policy No. 516 - Computer and Email Usage)

592 Lock and Key Control Procedures

Effective Date: 01/01/2023

Revision Date: 01/01/2023

Guidelines have been established governing the storage, issue and use of locks and keys at PrivateSky®. If you have been assigned keys and locks by your supervisor you will be responsible and accountable for:

1. The handling and safeguarding of such assigned keys and locks and are responsible for the security of the area under their specific lock and key.
2. Notifying your supervisor when keys that protect company property are lost or misplaced;
3. Turning in or accounting for keys when terminating or transferring employees;
4. Storing the keys in a locked container when not in use, and passing the container on to the appropriate employee on the next shift, or taking the keys home, if appropriate.

Keys signed for will be inventoried every six (6) months.

601 Medical Leave (Non-FMLA)

Effective Date: 01/01/2023
Revision Date: 01/01/2023

PrivateSky® provides medical leaves of absence without pay to eligible employees who are temporarily unable to work due to a short term health condition that does not fit the criteria for FMLA.

Employees in the following employment classifications are eligible to request unpaid medical leave as described in this policy:

- * Regular full-time employees

Eligible employees may request medical leave only after having completed one hundred twenty (120) calendar days of service. Eligible employees should personally notify their supervisor as soon as possible.

Employees who sustain work-related injuries are eligible for a medical leave of absence for the period of disability in accordance with all applicable laws covering occupational disabilities.

Subject to the terms, conditions, and limitations of the applicable plans, PrivateSky® will continue to provide health insurance benefits for the full period of the approved medical leave. While on unpaid medical leave, the employee is responsible for their portion of the medical insurance premium. Any premium paid on behalf of the employee will be collected via payroll deduction upon return of the employee. If the employee does not return from medical leave, the company will attempt to collect the debt.

Benefit accruals, such as vacation, sick leave, or holiday benefits, will be suspended during the leave and will resume upon return to active employment.

Employees requesting unpaid medical leave are required to submit a health care provider's statement if more than two (2) consecutive days of medical leave are taken. If an employee fails to return to work on the agreed upon return date, PrivateSky® will assume that the employee has resigned.

602 Family and Medical Leave (FMLA) Policy

Effective Date: 01/01/2023

Revision Date: 01/01/2023

In agreement with the Family and Medical Leave Act (FMLA), PrivateSky® is committed to providing employees with reasonable time off to take care of themselves or family members in the event of a serious health condition, in the event of the birth of a child, an adoption or the foster placement of a child, to care for a service member or because of any qualifying exigency.

A. ENTITLEMENT TO LEAVE

1. An employee is eligible to take up to twelve (12) weeks of unpaid FMLA Leave within any twelve (12) month period and be restored to the same or an equivalent position upon his/her return from leave provided that:

(a) Employee has worked for PrivateSky® for at least one year; and

(b) Employee has worked for at least 1250 hours in the last twelve (12) months. A “rolling” twelve (12) month period measured backwards from the date the employee takes leave will be used for computing the period within which the twelve (12) weeks of leave may be taken. If a married couple both work for PrivateSky®, the maximum amount of FMLA Leave available for reasons B.1. (a) and (b) below is a combined total of 12 weeks.

2. An employee who requests leave to care for an injured or ill service member or qualifying veteran is entitled to take up to twenty-six (26) weeks of unpaid leave during a single twelve (12) month period.

3. The aggregate number of work weeks of leave to which both a husband and wife may be entitled to take care of a service member, pursuant to the service member leave provisions, is twenty-six (26) weeks

B. REASONS FOR LEAVE

1. An employee may take FMLA Leave for any of the following reasons:

(a) the birth of a child and care for such child;

(b) the placement of a child with the employee for adoption or foster care and to care for the newly placed child;

(c) to care for a spouse, child or parent with a serious health condition;

(d) because of the employee’s own serious health condition which renders the individual unable to perform an essential function of the position; or

PrivateSky® Aviation Services, Inc Policy and Procedure Manual

(e) because of any qualifying exigency (as the Secretary shall, by regulation, determine) arising out of the fact that the spouse, or a son, daughter or parent of the employee is on active duty (or has been notified of an impending call or order to active) in the Armed Forces in support of a contingency operation.

2. Service member family leave is to care for a service member or qualifying veteran who suffered a serious injury or illness. Serious injury or illness, in the case of a service member, means an injury or illness incurred in the line of duty while on active duty in the Armed Forces that may render the service member medically unfit to perform the duties of the service member's office, grade, rank or rating. Note that the limitation set forth in B.1(c) does not apply when an employee requests leave to care for an injured or ill service member. The only requirement imposed is that the employee be the service member's next of kin. Next of kin, in this context, means the nearest blood relative of the injured or ill service member.

3. Leave because of reasons B.1. (a) or (b) must be completed within the twelve (12) month period beginning on the date of birth or placement.

C. NOTICE OF LEAVE

To request leave, the employee must notify PrivateSky® by completing appropriate forms available from the Human Resources Department. The employee should give thirty (30) days prior written notice, or as much advance written notice as possible. However, if it appears that the employee may be absent due to an FMLA-qualified event or serious health condition the Employer may, but is not required to, preliminarily designate the employee's time off as FMLA Leave, pending the receipt of appropriate documentation. Failure to provide requested FMLA Leave Documentation and certification within fifteen days may result in PrivateSky® making a determination of the leave status without such documentation. PrivateSky® may delay or deny leave, demand the employee return to work, treat absences as unauthorized time off, subject the employee to discipline up to and including termination, and/or continue the FMLA Leave.

D. MEDICAL CERTIFICATION

If medical leave is requested due to a serious health condition (reasons B.1. (c) or (d) above) under FMLA it must be certified by the attending doctor or physician. He/she will be required to complete a Certification of Health Care Provider to establish the employee's eligibility for FMLA and amount of time off needed. Whenever possible the Medical Certification should be supplied before the leave begins.

The employee must provide a copy of such certification in a timely manner, but no more than fifteen (15) days after the request for leave. The following specifies what must be obtained with certification.

1. Date of onset of serious health condition;
2. Probable duration;
3. Appropriate medical facts within knowledge of health care providers regarding the condition;

PrivateSky® Aviation Services, Inc

Policy and Procedure Manual

4. For leave to care for spouse, child, parent or service member: that the employee is needed to care for spouse, child, parent or service member;

5. For leave due to serious health condition: that the employee cannot perform the function of the position of the employee;

6. For intermittent leave or leave on a reduced leave schedule for planned medical treatment: the date(s) on which such treatment is expected and the duration of the treatment; and

When intermittent leave arises due to needs to care for spouse, child or parent: that intermittent or reduced leave is necessary for care or will assist in their recovery and the expected duration or schedule of such leave;

7. If an employer has reason to doubt the validity of a certification, the employer may require and pay for the opinion of a second health care provider. The health care provider shall not be employed on a regular basis by the employer.

If the second opinion conflicts with the first opinion, the employer may require, at its expense, a third opinion approved jointly by the employer and the employee. The opinion of the third health care provider shall be considered final and binding.

Outside employment/moonlighting is prohibited during FMLA Leave.

During the approved leave, PrivateSky® may require from time to time, at its own expense, that a serious medical condition be recertified.

E. INTERMITTENT AND REDUCED SCHEDULED LEAVE

Leave for a serious health condition may be taken intermittently or on a reduced leave schedule when that type of scheduling is medically necessary. If the employee requests intermittent leave or leave on a reduced schedule, he/she may be required to transfer to a temporary alternative job for which he/she is qualified and that better accommodates the intermittent or reduced hour leave than his/her regular job. The temporary position will have pay and benefits equivalent to the employee's regular position.

F. REGULAR CONTACT WITH THE COMPANY

During the approved leave, the employee is responsible to keep in contact with PrivateSky® on a regular basis. For leaves more than thirty (30) days, the employee should contact the Human Resources Department at least once every four (4) weeks and inform PrivateSky® of the status and the intended return to work. Regular contact is necessary during the approved leave to help ensure all appropriate insurance coverage is in order.

Before returning to work from the approved leave, the employee must contact PrivateSky®. At least seven (7) days before returning to work, the employee must contact the Human Resources Department and state the intent to return to work and the date of return to the workplace. Notification is necessary before returning to help ensure that the employee is reactivated on the payroll system as soon as possible.

Before returning to work from approved medical leave, the employee must present certification from the health care provider stating that the employee is able to return to standard job duties.

PrivateSky® Aviation Services, Inc

Policy and Procedure Manual

This certification must be presented before the return to work can be approved.

When returning to work from the approved leave, the employee will be able to return to the same position or an equivalent position provided employee is physically able to perform. PrivateSky® will not guarantee the same position or an equivalent position if the leave extends past twelve (12) weeks (twenty-six (26) weeks in a single twelve (12) month period if the leave qualifies as service member family leave), and may result in termination of employment.

If the employee does not return to work from approved leave within the FMLA guidelines, COBRA will take effect when applicable.

G. LEAVE IS UNPAID

FMLA leave is generally unpaid leave. The employee may be required to use accrued paid time (sick or vacation) to be used first before taking unpaid leave while on Family and Medical Leave.

While on FMLA, employee benefits will be continued. Contributions ordinarily made by the employee through payroll deductions must be continued during the leave period. The employee's total contribution amount due for that period must be paid by mail or in person on or before each regularly scheduled payday. Should payments cease, benefits will be suspended until payments resume or the employee returns to work.

PrivateSky® will also consider any time off due to a workplace illness or injury to be counted as Family and Medical Leave.

Any absence away from work due to FMLA will not result in any change of salary/performance review date.

Employees are required to turn in all PrivateSky® equipment or materials prior to FMLA.

At the end of the leave, the employee will be returned to the position held when leave began or he/she will be given an equivalent position with like benefits, pay, and other terms and conditions of employment. It is important for the employee to notify his/her supervisor of the progress of their leave and to inform PrivateSky® in advance of the date of return to active service.

H. FAILURE TO RETURN FROM LEAVE

If an employee takes FMLA leave and fails to return to work, PrivateSky® has the right to recover from the employee any insurance premiums paid on behalf of the employee during the leave period provided that the reason is not because of continued illness, recurrence or the onset of a serious health condition or other circumstances beyond the employee's control.

I. DEFINITIONS

1. "Active Duty" means duty under a call or order to active duty under a provision of law referred to in Title 10, U.S.C. Section 101(a)(13)(B).

2. "Contingency Operation" has the same meaning given such term in Title 10, U.S.C. Section 101(a)(13).

PrivateSky® Aviation Services, Inc

Policy and Procedure Manual

3. "Covered Service member" means a member of the Armed Forces, including a member of the National Guard or Reserves, who is undergoing medical treatment, recuperation or therapy, is otherwise in outpatient status or is otherwise on the temporary disability retired list for a serious injury or illness. Covered Service member includes a veteran who is undergoing medical treatment, recuperation, or therapy, for a serious injury or illness and who was a member of the Armed Forces (including a member of the National Guard or Reserves) at any time during the period of 5 years preceding the date on which the veteran undergoes that medical treatment, recuperation or therapy.

4. "Eligible employee" is an employee who has been employed at least twelve (12) months by the employer with respect to whom leave is requested and has worked for at least 1,250 hours of service with such employer during the last twelve (12) month period preceding the start of leave. Eligible employee also includes an employee whose spouse, parent, or child is a member of a reserve component of the Armed Forces and may take FMLA leave for a qualifying exigency arising from the fact that the reservist is deployed to a foreign country on active duty pursuant to certain statutory provisions.

5. "Health Care Provider" is a Doctor of medicine or osteopathy who is authorized to practice medicine or surgery by the state where the doctor practices;

(a) Any other person the Secretary of Labor determines to be capable of providing health care services.

6. "Outpatient Status," used with respect to a covered service member or qualifying veteran, means the status of a member of the Armed Forces assigned to:

(a) A military medical treatment facility as an outpatient; or

(b) A unit established for the purpose of providing command and control of members of the Armed Forces receiving medical care as outpatients.

7. "Next of Kin," used with respect to an individual, means the nearest blood relative of that individual.

8. "Parent" is used in its broadest sense and means biological or one who has day-to-day responsibilities for caring for a child. A "parent" does not include a parent-in-law.

9. "Qualifying Exigency," means time off:

(a) To address issues arising from the fact that a covered family member is called to active duty with less than eight days advance notice before deployment;

(b) To attend military events, programs, or ceremonies;

(c) To arrange for alternative childcare or provide childcare for the covered family member's children;

(d) To enroll the child of a covered family member in a new school or day care facility;

(e) To attend meetings with school or day care facility staff members relating to the child of a

PrivateSky® Aviation Services, Inc

Policy and Procedure Manual

covered family member who is unable to attend because of military service;

(f) To make or update financial or legal arrangements relating to the covered family member's absence for military service;

(g) To represent the covered family member in proceedings relating to military service benefits;

(h) To attend counseling for the employee, the covered family member, or the family member's child relating to the family member's military service;

(i) To spend time with a covered family member who is on a rest-and-recuperation leave from the military;

(j) To address issues relating to the death of a covered family member while on active duty;

(k) To address other events relating to a covered family member's active duty or call to active duty, provided the employer agrees that such event qualifies as an exigency and agrees to the timing and duration of the leave.

10. "Serious Injury or Illness," in the case of a member of the Armed Forces, including a member of the National Guard or Reserves, means an injury or illness incurred by the service member in the line of duty on active duty in the Armed Forces that may render the member medically unfit to perform the duties of the member's office, grade, rank or rating.

11. "Son or Daughter" is used in the broadest sense and means biological child or a child of one who stands in the place of a parent who is less than eighteen (18) years of age or is older than eighteen (18) years of age but cannot care for themselves because of mental or physical disability.

12. "Spouse" is a husband or wife by legal or common-law marriage. This does not include a "life partner."

13. "Serious Health Condition" is defined as an illness, injury, impairment, or physical or mental condition that involves;

(a) Inpatient care (i.e., an overnight stay) is a hospital, hospice, or residential medical care facility including any period of incapacity (defined to mean inability to work, attend school or perform other regular activities due to the serious health condition, treatment there for, or recovery there from), or any subsequent treatment in connection with such inpatient care, or;

(b) Continuing treatment by a health care provider. A serious health condition involving continuing treatment by a health care provider includes any one or more of the following:

(i) A period of incapacity (i.e., inability to work, attend school or perform other regular daily activities due to serious health condition, treatment therefore, or recovery there from) of more than three consecutive calendar days, and any subsequent treatment or period of incapacity relating to the same condition, that also involves:

(a) Treatment for two or more times by a health care provider, by a nurse or physician's assistant under direct supervision of a health care provider, or by a provider of health care services (e.g., physical therapist) under orders, or on referral by, a health care provider, or

(b) Treatment by a health care provider on at least one occasion which results in a regimen of

PrivateSky® Aviation Services, Inc
Policy and Procedure Manual

continuing treatment under the supervision of the health care provider.

(ii) Any period of incapacity due to pregnancy, or for prenatal care.

(iii) Any period of incapacity of treatment for such incapacity due to a chronic serious health condition. A chronic serious health condition is one which:

(a) Requires periodic visits for treatment by a health care provider, or by a nurse or physician's assistant under the direct supervision of a health care provider;

(b) Continues over an extended period of time (including recurring episodes of a single underlying condition), and

(c) May cause episodic rather than a continuing period of incapacity (e.g., asthma, diabetes, epilepsy, etc.).

14. Serious Health Condition – Service Member/Veteran.

(a) In the case of a member of the Armed Forces (including a member of the National Guard or Reserves), means an injury or illness that was incurred by the member in line of duty on active duty in the Armed Forces (or existed before the beginning of the member's active duty and was aggravated by service in line of duty on active duty in the Armed Forces) and that may render the member medically unfit to perform the duties of the member's office, grade, rank, or rating; and

(b) In the case of a veteran who was a member of the Armed Forces (including a member of the National Guard or Reserves) at any time during a period described in paragraph (8)(B), means an injury or illness that was incurred by the member in line of duty on active duty in the Armed Forces (or existed before the beginning of the member's active duty and was aggravated by service in line of duty on active duty in the Armed Forces) and that manifested itself before or after the member became a veteran.

15. "Reduced leave schedule" is a leave schedule that reduces the usual number of hours per workweek or hours per workday of an employee.

16. "Year" is the twelve (12) month measurement period that an employee is eligible for twelve (12) weeks of FMLA. The "year" will commence when approved family/medical leave begins. When twelve (12) month anniversary arrives the employee will be eligible to take another leave of up to twelve (12) weeks. If the employee does not take another leave immediately, the second year does not begin until the next family/medical leave is granted. In other words, the twelve (12) month period is calculated on a rolling 12-month period basis and is measured backward from the date of any FMLA usage.

605 Military Leave

Effective Date: 01/01/2023
Revision Date: 01/01/2023

UNIFORMED SERVICES LEAVE

A. Scope

Reservists ordered to report to, or who volunteer for, active duty in the National Guard, Reserves or other Armed Forces will follow the established policy of uniformed services leave as specified below and in accordance with “Uniformed Services Employment and Reemployment Rights Act of 1994” (USERRA) and the Final Rule effective 01/18/06.

B. Policy

Employees called to uniformed service will continue to accrue service credit and, with certain exceptions, have guaranteed reinstatement to work in jobs at the same level of pay and benefits as the employee would have received had the employee never left for uniformed service duty provided their “uniformed services leave” does not, in most instances, exceed five (5) cumulative years.

The 5-year limit may not apply under the following circumstances: inactive duty training; annual training; involuntary recall to active duty or involuntary retention on active duty; or voluntary or involuntary active duty in support of war, national emergency or certain operational missions.

“Uniformed Services Leave” is defined as performance of such uniformed service duty on a commissioned or non-commissioned status, and on a voluntary or involuntary basis, in a uniformed service, including:

- 1) Active duty;
- 2) Active duty for training;
- 3) Initial active duty for training;
- 4) Inactive duty training;
- 5) Full-time National Guard duty;
- 6) Absence formwork for an examination to determine a person’s fitness for any of the above forms of duty; or
- 7) Funeral honors duty by National Guard or reserve members

C. Length Of Allowable Leaves

Uniformed Services Leave Personnel are entitled to a leave of absence for up to five (5) cumulative years of active duty including reasonable travel time. Uniformed Services Leave Personnel are guaranteed reinstatement to their former or a comparable position providing they return within the timeframe stated below:

PrivateSky® Aviation Services, Inc

Policy and Procedure Manual

- 1) Service of 1 to 30 days: must personally report to duty on the first full business day after the completion of service;
- 2) Service of 31 to 180 days: must personally report to duty within 14 days of completion of service; or
- 3) Service of more than 180 days: must personally report within 90 days of completion of service.

And:

- 1) Provided advance notice was given to PrivateSky®;
- 2) The employee has five years or less cumulative service;
- 3) The employee timely returns to work; and
- 4) The employee received an honorable discharge.

D. Use Of Earned Leave

Vacation and Personal days: During uniformed services leave, employees are entitled to use any vacation, floating holidays or personal days accrued prior to the commencement of said leave.

E. Continued Benefits

- 1) Employees on uniformed services leave will continue to accrue service credit (i.e., seniority);
- 2) Group medical insurance coverage may be continued by the employee who was covered under the plan by arranging to pay their employee share of the premiums for the first month and thereafter paying both the employee and employer contribution for up to 24 months. After 24 months of uniformed services leave, the employee, and their eligible dependents, may elect to participate in COBRA coverage (for 18 months) but will be required to pay up to 102 percent of the full premium. Contact the Human Resources Department for further information.
- 3) Qualified Plan Contributions. Upon an employee's reemployment, PrivateSky® will make up any missed contributions to the plan that would have been paid had the employee not been on uniformed services leave. Such make-up contributions will be made in the same manner and to the same extent that allocation occurs for other employees during the period of service. Further, upon reemployment, an employee will be provided an opportunity to make up any elected deferrals missed as a result of Uniformed Service Leave. Any employee make-up contributions must be made, starting at the date of reemployment, within a period consisting of three times the length of uniformed services leave, not to exceed five (5) years.

G. Employee/Supervisor Responsibilities

Uniformed Services Personnel called to duty should notify their supervisors and the Human Resources Department as soon as possible and present a copy of their orders as they are received.

607 Pregnancy-Related Absences

Effective Date: 01/01/2023
Revision Date: 01/01/2023

PrivateSky® will not discriminate against any employee who requests an excused absence for medical reasons related to pregnancy or disabilities associated with pregnancy. Such leave requests will be evaluated according to the medical leave policy provisions outlined in this handbook and all applicable federal and state laws.

Requests for time off associated with pregnancy and/or childbirth, such as bonding and child care, not related to medical disabilities for those conditions will be considered in the same manner as other requests for unpaid family or personal leave

608 Domestic Violence Leave Policy

Effective Date: 01/01/2023
Revision Date: 01/01/2023

An eligible employee may take two (2) days of domestic violence leave in any twelve (12) month period. An eligible employee is an employee who has completed at least one hundred twenty (120) days of service.

An employee requesting domestic violence leave pursuant to this policy may be required to use accrued, unused paid time off in lieu of unpaid leave if the employee has accrued but unused time off.

Domestic violence leave may be taken for any of the following reasons:

- 1) Seek an injunction for protection against domestic violence or an injunction for protection in cases of repeat violence, dating violence, or sexual violence;
- 2) Obtain medical care or mental health counseling, or both, for the employee or a family or household member to address physical or psychological injuries resulting from the act of domestic violence;
- 3) Obtain services from a victim services organization, including, but not limited to, a domestic violence shelter or program or a rape crisis center as a result of the act of domestic violence;
- 4) Make the employee's home secure from the perpetrator of the domestic violence or to seek new housing to escape the perpetrator; or
- 5) Seek legal assistance in addressing issues arising from the act of domestic violence or to attend and prepare for court-related proceedings arising from the act of domestic violence.

Except in the case of an emergency, employees are required to provide five (5) days advance notice of the employee's need to take leave under this policy.

Information provided by an employee in connection with his/her request for leave pursuant to this policy shall be confidential.

680 Personal Activities and Outside Appointments

Effective Date: 01/01/2023

Revision Date: 01/01/2023

The standards of efficiency are necessarily very high for personnel in our work environment. There is seldom a moment when all work is completed. Employees are, therefore, to postpone personal tasks until after work or during the lunch period if they must leave the premises.

Employees should notify their supervisor of all outside appointments in advance. In addition, no personal phone calls or texting are to be made during working hours except in the case of an emergency.

In order to avoid adding to the increasing volume of mail, employees should not use the company's address in receiving and/or sending personal mail. **Personal phones and/or equipment are not permitted on their person during working hours.**

701 Employee Conduct and Work Rules

Effective Date: 01/01/2023
Revision Date: 01/01/2023

The purpose of this policy is to state PrivateSky®'s position on administering equitable and consistent discipline for unsatisfactory conduct in the workplace. The best disciplinary measure is the one that does not have to be enforced and comes from good leadership and fair supervision at all employment levels.

PrivateSky®'s own best interest lies in ensuring fair treatment of all employees and in making certain that disciplinary actions are prompt, uniform, and impartial. The major purpose of any disciplinary action is to correct the problem, prevent recurrence, and prepare the employee for satisfactory service in the future.

Although employment with PrivateSky® is based on mutual consent and both the employee and PrivateSky® have the right to terminate employment at will, with or without cause or advance notice, PrivateSky® may use progressive discipline at its discretion.

Disciplinary action may call for any of four steps -- verbal warning, written warning, suspension with or without pay, or termination of employment -- depending on the severity of the problem and the number of occurrences. There may be circumstances when one or more steps are bypassed.

Progressive discipline means that, with respect to most disciplinary problems, these steps will normally be followed: a first offense may call for a verbal warning; a next offense may be followed by a written warning; another offense may lead to a suspension; and, still another offense may then lead to termination of employment. If more than 12 months have passed since the last disciplinary action, the process will normally start over.

PrivateSky® recognizes that there are certain types of employee problems that are serious enough to justify either a suspension, or, in extreme situations, termination of employment, without going through the usual progressive discipline steps.

While it is impossible to list every type of behavior that may be deemed a serious offense, this Policy includes examples of problems that may result in immediate suspension or termination of employment. However, the problems listed are not all necessarily serious offenses, but may be examples of unsatisfactory conduct that will trigger progressive discipline.

By using progressive discipline, we hope that most employee problems can be corrected at an early stage, benefiting both the employee and PrivateSky®.

PrivateSky® Aviation Services, Inc

Policy and Procedure Manual

In keeping with PrivateSky® Aviation Services, Inc.'s commitment to TOTAL EXCELLENCE™, our continuous goal is to ensure orderly operations and provide the best possible work environment, PrivateSky® expects employees to follow rules of conduct that will protect the interests and safety of all employees and the company. The company realizes that unforeseen situations may arise from time to time and cause a problem with an employee's regular work habits. The employee should notify his or her supervisor or manager as soon as this type of problem occurs so that arrangements can be made to help the employee bring their job performance back to an acceptable level.

While, it is not possible to list all forms of behavior that are considered unacceptable in the workplace, the following are examples of infractions of rules of conduct that may result in disciplinary action, up to and including termination of employment:

- Theft or inappropriate removal or possession of company property including tools, equipment or property of others (regardless of value).
- Misusing company property including tools, equipment or property of others (regardless of value).
- Taking part in illegal activities on company premises.
- Willful falsification or alteration of company records, including employment applications, licenses or certifications, physical condition, medical claims, expense reports or timekeeping records.
- Working under the influence of alcohol or illegal drugs; demonstrated inability to perform assigned job duties while under the influence of legal drugs; if you are under a doctor's care and use prescription drugs, and do not notify your supervisor and provide written documentation from the treating physician.
- Not providing a doctor's release when returning to work due to an illness of two (2) days or more.
- Refusal to submit to company drug/alcohol screening or physical according to the company policy.
- Refusal to permit search of private auto, personal effects or person.
- Possession, distribution, sale, transfer, or use of alcohol or illegal drugs in the workplace, while on duty, or while operating employer-owned vehicles or equipment.
- Fighting or participating in a fight, attempting bodily injury to persons or threatening violence in the workplace.
- Boisterous or disruptive activity in the workplace.
- Negligence or improper conduct leading to damage of employer-owned or customer-owned property.

PrivateSky® Aviation Services, Inc

Policy and Procedure Manual

- Insubordination, disrespectful or disorderly conduct on company property Violation of safety or health rules.
- Failure to immediately report job-related injury or accident.
- Smoking in prohibited areas or chewing tobacco in mouth around customers.
- Sexual or other unlawful or unwelcome harassment.
- Inappropriate behavior (use of profanity, lying, discourteous treatment, threats, coercion, fraud or any conduct not conducive to a productive work environment) to or in the presence of visitors, customers or employees
- Immoral or indecent conduct (acts conflicting with generally or traditionally held moral workplace principles and/or those so grossly, unseemly or offensive to manners and morals that they tend to place the Company in questionable perspective).
- Possession of dangerous or unauthorized materials, such as explosives or firearms, in the workplace without prior written approval from the COO.
- Unauthorized absence for two (2) days without notifying direct supervisor or COO and obtaining approval.
- Failure to notify supervisor of absences within eight (8) hours before or by the beginning of the scheduled shift unless approved, paid or unpaid absence or on approved LOA.
- Excessive absenteeism or any absence without notice (scheduled or overtime), "No Show" (includes times tardy for overtime) which have an unacceptable effect on the business.
- Unauthorized absence from work station during the workday.
- Loafing or wasting time during assigned work hours.
- Sleeping during assigned work hours.
- Gambling on company property.
- Unauthorized use of phones, mail system, or other employer-owned equipment.
- Unauthorized inspection, copying, possession or disclosure of business "secrets" or confidential information to unauthorized persons.
- Violation of personnel policies, company security or rules.
- Unsatisfactory performance or conduct (current employees who have completed the required one hundred twenty (120) evaluation period).
- Sharing computer password.
- Clocking in for another employee.
- Making, acquiring or using authorized copies of computer software or company documents.
- Soliciting, selling or collecting for contributions for any purpose on company premises without approval from management.
- Distributing any kind of written or printed material in work areas during work hours without permission from management.
- Working at the airport for another employer that would be considered a conflict of interest.
- Making personal long distance calls; receiving personal calls on the incoming company lines; abuse of the toll-free or company lines.

PrivateSky® Aviation Services, Inc

Policy and Procedure Manual

- Using company e-mail or Internet connection for personal use unrelated to your job.
- Verified discrimination in hiring, training, treatment, etc., of any employee because of race, color, religion, national origin, age, sex or veteran status

In listing the rules of conduct, the company has tried to avoid unnecessary restrictions on your personal conduct, and has confidence that you will conduct yourself properly. If a company policy is violated, all circumstances will be given appropriate consideration before any corrective action will be taken.

While PrivateSky®'s philosophy is to respect the privacy of the individual, there may be situations where, for business reasons, and on company property, searches of private autos, desks, lockers, property, etc., may be conducted by designated individuals with the prior approval of designated officials. As a condition of employment, you are required to submit to such searches.

Employment with PrivateSky® is at the mutual consent of PrivateSky® and the employee, and either party may terminate that relationship at any time, with or without cause, and with or without advance notice.

702 Drug and Alcohol Use

Effective Date: 01/01/2023

Revision Date: 01/01/2023

It is PrivateSky®'s desire to provide a drug-free, healthful, and safe workplace. To promote this goal, employees are required to report to work in appropriate mental and physical condition to perform their jobs in a satisfactory manner.

While on PrivateSky® premises and while conducting business-related activities off PrivateSky® premises, no employee may use, possess, distribute, sell, or be under the influence of alcohol or illegal drugs. The legal use of prescribed drugs is permitted on the job only if it does not impair an employee's ability to perform the essential functions of the job effectively and in a safe manner that does not endanger other individuals in the workplace.

Violations of this policy may lead to disciplinary action, up to and including immediate termination of employment, and/or required participation in a substance abuse rehabilitation or treatment program. Such violations may also have legal consequences.

To inform employees about important provisions of this policy, PrivateSky® has established a drug-free awareness program. The program provides information on the dangers and effects of substance abuse in the workplace, resources available to employees, and consequences for violations of this policy.

Employees with questions or concerns about substance dependency or abuse are encouraged to discuss these matters with their supervisor or the CEO or COS to receive assistance or referrals to appropriate resources in the community.

Employees with drug or alcohol problems that have not resulted in, and are not the immediate subject of disciplinary action, may request approval to take unpaid time off to participate in a rehabilitation or treatment program. Leave may be granted if the employee agrees to abstain from use of the problem substance; abides by all PrivateSky® policies, rules, and prohibitions relating to conduct in the workplace; and if granting the leave will not cause PrivateSky® any undue hardship.

Under the Drug-Free Workplace Act, an employee who performs work for a government contract or grant must notify PrivateSky® of a criminal conviction for drug-related activity occurring in the workplace. The report must be made within five days of the conviction.

Employees with questions on this policy or issues related to drug or alcohol use in the workplace should raise their concerns with their supervisor or the CEO without fear of reprisal.

703 Sexual and Other Unlawful Harassment

Effective Date: 01/01/2023

Revision Date: 01/01/2023

PrivateSky® is committed to providing a work environment that is free from all forms of discrimination and conduct that can be considered harassing, coercive, or disruptive, including sexual harassment. Actions, words, jokes, or comments based on an individual's sex, race, color, national origin, age, religion, disability, sexual orientation, or any other legally protected characteristic will not be tolerated. PrivateSky® strives to ensure you have the opportunity to work in an environment free of sexual and other unlawful harassment.

Sexual harassment is defined as unwanted sexual advances, or visual, verbal, or physical conduct of a sexual nature. This definition includes many forms of offensive behavior and includes gender-based harassment of a person of the same sex as the harasser. The following is a partial list of sexual harassment examples:

- * Unwanted sexual advances.
- * Offering employment benefits of any kind in exchange for sexual favors.
- * Making or threatening reprisals of any kind after a negative response to sexual advances.
- * Visual conduct of any kind that includes leering, making sexual gestures, or displaying of sexually suggestive objects, pictures, images or posters.
- * Verbal conduct that includes making or using derogatory or suggestive comments, epithets, slurs, jokes, etc.
- * Verbal sexual advances or propositions.
- * Verbal abuse of a sexual nature, graphic verbal commentaries about an individual's body, sexually degrading words used to describe an individual, suggestive or obscene letters, notes, invitations, etc.
- * Physical conduct that includes hugging, touching, assaulting, or impeding or blocking movements.

PrivateSky® Aviation Services, Inc

Policy and Procedure Manual

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.

If you experience or witness sexual or other unlawful harassment in the workplace, report it immediately to your supervisor. If the supervisor is unavailable or you believe it would be inappropriate to contact that person, you should immediately contact any other member of management. You can raise concerns and make reports without fear of reprisal or retaliation. Please provide date(s), time(s), location(s), and all other pertinent details.

All allegations of sexual harassment will be quickly and discreetly investigated. To the extent possible, your confidentiality and that of any witnesses and the alleged harasser will be protected against unnecessary disclosure.

Any supervisor or manager who becomes aware of possible sexual or other unlawful harassment must immediately advise a member of management so it can be investigated in a timely and confidential manner. Anyone engaging in sexual or other unlawful harassment will be subject to disciplinary action, up to and including termination of employment.

704 Attendance and Punctuality

Effective Date: 01/01/2023

Revision Date: 01/01/2023

To maintain a safe and productive work environment, PrivateSky® expects employees to be reliable and to be punctual in reporting for scheduled work. Absenteeism and tardiness (lateness) places a burden on other employees and on PrivateSky®. In the rare instances when employees cannot avoid being late to work or are unable to work as scheduled, they should notify their supervisor eight (8) hours in advance of their shift, except in the case of extenuating circumstances, in which case, it shall be no later than the start of the regular shift. The employee must personally and directly notify their supervisor or senior management only, except in the case of extenuating circumstances.

Poor attendance and excessive tardiness are disruptive. Either may lead to disciplinary action, up to and including termination of employment.

Employees are expected to be clocked in and ready for work at the start of their scheduled shift. Clocking in after the start of their scheduled shift is viewed as tardy.

Under PrivateSky®'s corrective action and performance policies, tardiness and absenteeism are treated as separate violations. The following corrective action standards of attendance and tardiness will provide guidance:

CORRECTIVE ACTION PROCEDURES

Unexcused

Absence (No Pay) - Written Warning up to and including Termination

Unexcused Tardy - Written Warning

Excessive unexcused tardy's may result in Termination

Written corrective action should be taken when the standards are exceeded and there are not acceptable, justifiable or unusual circumstances. A chronic series of absences, or an extended absentee record covering an extended period of time may provide sufficient reason to apply the corrective action policy.

NOTE: Time is calculated on the 1/10 of each hour or every six (6) minutes. If an employee is late, deductions in time begin from the employee's scheduled start time.

705 Personal Appearance

Effective Date: 01/01/2023

Revision Date: 01/01/2023

Dress, grooming, and personal cleanliness standards contribute to the morale of all employees and affect the business image PrivateSky® presents to customers and visitors.

During business hours or when representing PrivateSky®, you are expected to present a clean, neat, and tasteful appearance. You should dress and groom yourself according to the requirements of your position and accepted social standards. This is particularly true if your job involves dealing with customers or visitors in person.

Your supervisor or department head is responsible for establishing a reasonable dress code appropriate to the job you perform. If your supervisor feels your personal appearance is inappropriate, you may be asked to leave the workplace until you are properly dressed or groomed. Under such circumstance, you will not be compensated for the time away from work. Consult your supervisor if you have questions as to what constitutes appropriate appearance. Where necessary, reasonable accommodation may be made to a person with a disability.

Without unduly restricting individual tastes, the following personal appearance guidelines should be followed:

- * Maintenance Service Center personnel and Line Service personnel and any other employee involved in the operation functions of the company are required to wear safety shoes (Steel, composite, or alloy toe only)
- * All other employee shoes must provide safe, secure footing, and offer protection against hazards.
- * Canvas or athletic type shoes are not appropriate professional attire.
- * Tank tops, tube or halter tops, may not be worn under any circumstances.
- * Mustaches and beards must be clean, well-trimmed, and neat.
- * Hairstyles are expected to be in good taste.
- * Unnaturally colored hair and extreme hairstyles, such as spiked hair, do not present an appropriate professional appearance.
- * Long hairstyles should be worn with hair pulled back off the face and neck to avoid interfering with job performance.
- * Perfume, cologne, and aftershave lotion should be used moderately or avoided altogether, as some individuals may be sensitive to strong fragrances.
- * Tattoos must be covered by attire
- * Jewelry should not be functionally restrictive, dangerous to job performance, or excessive.
- * Facial jewelry, such as eyebrow rings, nose rings, lip rings, etc., is not professionally appropriate and must not be worn during business hours.

PrivateSky® Aviation Services, Inc

Policy and Procedure Manual

706 Return of Property

Effective Date: 01/01/2023

Revision Date: 01/01/2023

Employees are responsible for all PrivateSky® property, materials, or written information issued to them or in their possession or control.

All PrivateSky® property must be returned by employees on or before their last day of work. Where permitted by applicable laws, PrivateSky® may withhold from the employee's check or final paycheck the cost of any items that are not returned when required. PrivateSky® may also take all action deemed appropriate to recover or protect its property.

710 Security Inspections

Effective Date: 01/01/2023

Revision Date: 01/01/2023

PrivateSky® wishes to maintain a work environment that is free of illegal drugs, alcohol, firearms, explosives, or other improper materials. To this end, PrivateSky® prohibits the possession, transfer, sale, or use of such materials on its premises. PrivateSky® requires the cooperation of all employees in administering this policy.

Desks, lockers, and other storage devices may be provided for the convenience of employees but remain the sole property of PrivateSky®. Accordingly, they, as well as any articles found within them, can be inspected by any agent or representative of PrivateSky® at any time, either with or without prior notice.

PrivateSky® likewise wishes to discourage theft or unauthorized possession of the property of employees, PrivateSky®, visitors, and customers. To facilitate enforcement of this policy, PrivateSky® or its representative may inspect not only desks and lockers but also persons entering and/or leaving the premises and any packages or other belongings. Any employee who wishes to avoid inspection of any articles or materials should not bring such items anywhere on PrivateSky®'s premises.

712 Solicitation

Effective Date: 01/01/2023

Revision Date: 01/01/2023

In an effort to ensure a productive and harmonious work environment, persons not employed by PrivateSky® may not solicit or distribute literature in the workplace at any time for any purpose.

PrivateSky® recognizes that employees may have interests in events and organizations outside the workplace. However, employees may not solicit or distribute literature concerning these activities during work shift or working time.

In addition, the posting of written solicitations on company bulletin boards is restricted. These bulletin boards display important information, and employees should consult them frequently for:

- Affirmative Action statement
- Employee announcements
- Internal memoranda
- Job openings
- Organization announcements
- Workers' compensation insurance information
- State disability insurance/unemployment insurance information

If employees have a message of interest to the workplace, they may submit it to the COS for approval. All approved messages will be posted by the COS.

714 Drug Testing

Effective Date: 01/01/2023

Revision Date: 01/01/2023

The Department of Transportation mandates the drug testing of all safety sensitive employees of PrivateSky® in accordance with CFR 49 Part 40 and CFR 14 Part 120. This section is a Company Policy and is applicable to ALL employees and in no way circumvents the requirements of CFR 49 Part 40 and CFR 14 Part 120 as applicable to Safety Sensitive Employees. As such, PrivateSky® is committed to providing a safe, efficient, and productive work environment for all employees. Using or being under the influence of drugs or alcohol on the job may pose serious safety and health risks. To help ensure a safe and healthful working environment, job applicants and employees may be asked to provide body substance samples (such as urine and/or blood) to determine the illicit or illegal use of drugs and alcohol. Refusal to submit to drug testing may result in disciplinary action, up to and including termination of employment.

Legal Drug: Includes prescribed drugs and over-the-counter medications which have been legally obtained and are being used solely for the purpose of which they are prescribed or manufactured.

Illegal Drug: Any drug (a) which is not legally obtainable; (b) which may be legally obtainable but has not been legally obtained; or (c) which is being used in a manner or for a purpose other than as prescribed.

It shall be a condition of continued employment for all employees to submit to a drug screen when there is reasonable suspicion to believe that an employee is using or has used illegal drugs.

Circumstances that could be indicators of a substance-abuse problem and considered reasonably suspicious are as follows:

Information that an employee has caused, or contributed to, an accident while at work.

Observable phenomena while at work, such as direct observation of drug use or of the physical symptoms or manifestations of being under the influence of a drug.

Abnormal conduct or erratic behavior while at work or a significant deterioration in work performance.

A report of drug use provided by a reliable and credible source and independently corroborated.

Evidence that an individual has tampered with a drug test during his employment with PrivateSky®.

Whenever possible, the supervisor should have the employee observed by a second supervisor, manager, or COS before requiring testing. Employees who refuse substance abuse testing under these circumstances will be terminated and forfeit workers' compensation, medical and indemnity benefits.

PrivateSky® Aviation Services, Inc

Policy and Procedure Manual

Accident and Injury Procedures

Any employee involved in a work related accident, which requires medical treatment, above and beyond first-aid, must first receive treatment. The employee must then submit to a post-accident drug screen. A post-accident alcohol test may apply. The employee must report for testing to the designated collection site within 24 hours of the accident, if the drug and/or alcohol collection is not performed following treatment. Failure to do so will be considered a refusal to test, resulting in immediate termination.

3. Routine Fitness-for-duty

PrivateSky® requires an employee to submit to a drug test if the test is conducted as part of a routinely scheduled employee fitness-for-duty medical examination that is part of this company's established policy OR that is scheduled routinely for all members of an employment classification or group. Employees subject to any routine fitness-for-duty testing will be notified in writing and be required to sign a routine fitness-for-duty consent form.

4. Return to work and Follow-up drug testing

If an employee in the course of employment voluntarily enters an employee assistance program for drug-related problems, or an alcohol/drug rehabilitation program, PrivateSky® requires the employee to submit to a drug and/or alcohol test as a follow-up to such program. Follow-up testing must be conducted at least once a year for a two (2) year period after completion of the program. Advanced notice of a follow-up testing date must not be given to the employee to be tested.

5. Random Testing

PrivateSky® may conduct random drug testing as stated in Florida Statutes 440.102. A third-party company designated by PrivateSky® will generate a computerized random list of employees who would be required to submit to a random drug screen. When an employee is chosen for a random drug screen, their name automatically returns to the pool for future random tests.

Or

At other times and under such circumstances as deemed appropriate by PrivateSky® management in its sole discretion, and/or current state and/or federal standards. Employees will be given adequate notice of any addition/change/deletion in PrivateSky®'s drug testing requirements.

DRUGS TESTED FOR:

PrivateSky® may test for any or all of the following substances:

- Marijuana Metabolite
- Cocaine Metabolite
- Opioids Metabolite
- Amphetamines
- Phencyclidine

PrivateSky® Aviation Services, Inc

Policy and Procedure Manual

MEDICATION REPORT PROCEDURE:

Employees may confidentially report to the company's Medical Review Officer (MRO) the use of prescription or non-prescription medications both before and after being tested. Additionally, employees shall receive notice of the most common drugs or medications - by brand name or common name, as applicable as well as by chemical name - which may alter or affect a drug test. Employees have the right to consult the company's MRO for technical information regarding prescription and non-prescription medications.

MEDICAL REVIEW OFFICER:

The company's NON-DOT MRO is:

Dr. Stephen I. Merlin, MD - MRO 1620 Lady St # B
Columbia, SC 29201
Phone: 803-419-1023
Fax: 803-419-1123

The company's DOT MRO is:

Dr. Stephen J. Kracht, DO - MRO 7500 West 110th Street Suite 400A
Overland Park, KS 66210
Phone: 855-355-7058
Fax: 913-498-5038

Employees who receive a positive confirmed test result may contest or explain the result to the MRO. During the medical review with the employee, the MRO will inform the employee of the right to split analysis. He or she will have 72 hours to provide a written request for a split analysis at a 2nd certified lab. After MRO receives verification of a positive result, the MRO shall report a positive drug test back to PrivateSky® via secure fax or secure email. Upon notification from the MRO of a positive result, PrivateSky® will either terminate the employee or remove the employee from any safety-sensitive duties. If the split analysis fails to reconfirm the drug, the result of the test is cancelled. PrivateSky® has the right to pass the cost of requested split analysis to the employee.

An employee who had a verified positive drug or alcohol test or who refused to submit to a required test must be referred to a Substance Abuse Professional (SAP) for evaluation, and the employee will be notified of this requirement. Substance Abuse Professional means a licensed physician (Medical Doctor or Doctor of Osteopathy), or a licensed or certified psychologist, social worker, employee assistance professional, or addiction counselor (certified by the National Association of Alcoholism and Drug Abuse Counselors Certification Commission), with knowledge and clinical experience in this field.

The employee must be successfully rehabilitated at his/her own expense before he/she can resume the safety sensitive or security related position. After returning to duty, the employee must be tested at a schedule determined by the MRO for a minimum of six (6) follow-up tests for up to five (5) years. In the case of two verified positive results (FAA), or in the case of a prohibited drug being used while performing a safety sensitive function, the employee involved will be barred from performing the same duties performed before the violation.

PrivateSky® Aviation Services, Inc

Policy and Procedure Manual

CHALLENGES TO TEST RESULTS:

1. A requirement of a drug-free workplace program is that within five working days after receiving notice of positive, confirmed test result, the employee must be allowed to submit information to the Medical Review Officer explaining or contesting the test results. If the employee's explanation or challenge of the positive test result is unsatisfactory to the employer, the employee must be notified within fifteen days that the explanation is unsatisfactory and be given a copy of the positive test results. All documentation shall be kept confidential by the employer and shall be retained by the employer for at least one year.

GROUND FOR TERMINATION FOR DISCIPLINE:

ILLEGAL DRUG USE

The following are considered violations of PrivateSky® Aviation Services drug-free workplace policy and are subject to discipline, including discharge or suspension from employment without pay or loss of Workers' Compensation benefits, even for the first offense:

Refusing to take a company required drug test

Failing a company required drug test (a positive test result)

An employee bringing drugs onto the company premises or property (including company vehicles)

Possession of illegal drugs or drug paraphernalia on the employee's person

Using, consuming, transferring, selling or attempting to sell or transfer any form of illegal drug (as previously defined) while on company business or at any time during the hours between the beginning and ending of the employee's workday, whether on company property or not (including company vehicles).

A tampered with or an adulterated drug and/or alcohol specimen, will be considered a refusal to test, resulting in termination of employment. Any employee who refuses to test, tampers with or adulterates a drug and/or alcohol specimen, will automatically forfeit eligibility for medical and indemnity benefits under Florida's Workers' Compensation Law (Florida Statutes 440.101 and 440.102) and will also forfeit unemployment benefits under Florida law.

ALCOHOL ABUSE:

The following are considered violations of PrivateSky®'s drug-free workplace policy and are subject to discipline, including discharge or suspension from employment without pay and loss of Workers' Compensation benefits, even for the first offense:

Refusing to take a company required alcohol test

Failing a company required alcohol test

Under the influence of alcoholic beverages at any time on company business or at any time during the hours between the beginning and ending of the employee's workday, whether on company property or not (including company vehicles)

An employee shall be determined to be under the influence of alcohol if:

Employee's normal faculties are impaired due to consumption of alcohol

Employee has a blood alcohol level of .02 or higher.

PrivateSky® Aviation Services, Inc
Policy and Procedure Manual

CONFIDENTIALITY:

All information, interviews, reports, statement memoranda, and drug test results, written or otherwise, received by the employer through a drug testing program are confidential communications, and may not be used or received in evidence, obtained in discovery, or disclosed in any public or private proceedings except in accordance with this section or in determining condensability under Chapter 440 F.S. (Workers' Compensation).

This section does not prohibit an employer, agent of an employer, or laboratory conducting a drug test from having access to employee drug test information or using such information when consulting with legal counsel in connection with actions brought under or related to this section or when the information is relevant to its defense in a civil or administrative matter.

Copies of the drug testing policy will be provided to all employees. Employees will be asked to sign an acknowledgement form indicating that they have received a copy of the drug testing policy. Questions concerning this policy or its administration should be directed to the COO.

718 Problem Resolution and Open Door Policy

Effective Date: 01/01/2023

Revision Date: 01/01/2023

It is the policy of PrivateSky® to provide an effective and acceptable means for employees to bring problems and complaints concerning their work and well-being at work to the attention of management. PrivateSky® is committed to providing the best possible working conditions for its employees. Part of this commitment is encouraging an open and frank atmosphere in which any problem, complaint, suggestion, or question receives a timely response from PrivateSky® supervisors and management.

PrivateSky® strives to ensure fair and honest treatment of all employees. Supervisors, managers, and employees are expected to treat each other with mutual respect. Employees are encouraged to offer positive and constructive criticism.

If employees disagree with established rules of conduct, policies, or practices, they can express their concern through the problem resolution procedure. No employee will be penalized, formally or informally, for voicing a complaint with PrivateSky® in a reasonable, business-like manner, or for using the problem resolution procedure.

If a situation occurs when employees believe that a condition of employment or a decision affecting them is unjust or inequitable, they are encouraged to make use of the following steps. The employee may discontinue the procedure at any step.

1. Employee presents problem to immediate supervisor within five (5) working days after incident occurs. If supervisor is unavailable or employee believes it would be inappropriate to contact that person, employee may present problem to the CEO, COS, or any other member of senior management.
2. Supervisor responds to problem during discussion or after consulting with appropriate management, when necessary. Supervisor documents discussion.
3. Employee presents problem to CEO if problem is unresolved.
4. CEO counsels and advises employee, assists in putting problem in writing, consults with employee's manager(s).
5. CEO reviews and considers problem. CEO informs employee of decision and forwards copy of written response to the employee's supervisor for employee's file. The CEO has full authority to make any adjustment deemed appropriate to resolve the problem.

Not every problem can be resolved to everyone's total satisfaction, but only through understanding and discussion of mutual problems can employees and management develop confidence in each other. This confidence is important to the operation of an efficient and harmonious work environment, and helps to ensure everyone's job security.

722 Workplace Etiquette

Effective Date: 01/01/2023
Revision Date: 01/01/2023

PrivateSky® strives to maintain a positive work environment where employees treat each other with respect and courtesy. Sometimes issues arise when employees are unaware that their behavior in the workplace may be disruptive or annoying to others. Many of these day-to-day issues can be addressed by politely talking with a co-worker to bring the perceived problem to his or her attention. In most cases, common sense will dictate an appropriate resolution. PrivateSky® encourages all employees to keep an open mind and graciously accept constructive feedback or a request to change behavior that may be affecting another employee's ability to concentrate and be productive.

The following workplace etiquette guidelines are not necessarily intended to be hard and fast work rules with disciplinary consequences. They are simply suggestions for appropriate workplace behavior to help everyone be more conscientious and considerate of co-workers and the work environment. Please contact the CEO if you have comments, concerns, or suggestions regarding these workplace etiquette guidelines.

- Avoid public accusations or criticisms of other employees. Address such issues privately with those involved or your supervisor.

- Try to minimize unscheduled interruptions of other employees while they are working.

- Be conscious of how your voice travels, and try to lower the volume of your voice when talking on the phone or to others in open areas.

- Keep socializing to a minimum, and try to conduct conversations in areas where the noise will not be distracting to others.

- Refrain from using inappropriate language (swearing) that others may overhear.

- Avoid discussions of your personal life/issues in public conversations that can be easily overheard.

- Monitor the volume of your phone calls, voice mail, or a speakerphone that others can hear.

- Clean up after yourself and do not leave behind waste or discarded papers.

- Replace paper in the copy machine and printer paper trays when they are empty.

780 Theft or Damage of Company Property

Effective Date: 01/01/2023

Revision Date: 01/01/2023

All incidents of theft or damage involving personal or company property should be reported to your supervisor immediately. To prevent certain theft, it is very important that employees make sure that they secure all tools and equipment any time they leave their work area. The company will not bear any responsibility of replacing lost or stolen tools, whether personal or company-issued.

To ensure security to both the employee's and the company's property, occasional spot check of employee vehicles will be conducted. All vehicles, packages, briefcases and other containers entering PrivateSky® are subject to search to prevent the introduction of drugs, alcohol, firearms or other weapons, explosives, incendiary devices or other prohibited articles.

All vehicles, packages, briefcases and other containers leaving PrivateSky® property are subject to search to determine if PrivateSky® property is being removed without proper authorization. Total cooperation from employees is expected in this matter. If an employee fails to cooperate, the matter will be referred to your supervisor or the COS or CEO for appropriate corrective action.

Stealing of company property, or property of others, regardless of value will result in termination and, if circumstances warrant, possible prosecution. Misuse of company property, including tools, equipment, vehicles, or property of others regardless of value, will result in appropriate corrective action, from written warning to termination.

No company property will be removed by employees without prior authorization from their supervisor and/or the COS or the CEO.

725 Workplace Violence Policy

Effective Date: 01/01/2023

Revision Date: 01/01/2023

The costs of workplace violence can be great, both in human and financial terms.

Acts or threats of physical violence, including intimidation, harassment, and/or coercion, that involve or affect the Company or that occur on Company property, including using the Company's computers and email, or in the conduct of the Company's business off the Company's property, will not be tolerated. This prohibition against threats and acts of violence applies to all persons involved in the Company's operations, including, but not limited to, the Company's personnel, contract workers, temporary employees, and anyone else on the Company's property or conducting the Company's business off the Company's property. Violations of this policy, by any individual, may lead to disciplinary and/or legal action as appropriate.

Workplace violence is any intentional conduct that is sufficiently severe, offensive, or intimidating to cause an individual to reasonably fear for his or her personal safety or the safety of his or her family, friends, and/or property such that employment conditions are altered or a hostile, abusive, or intimidating work environment is created for one or more employees. Workplace violence may involve any threats or acts of violence occurring on the Company's premises, regardless of the relationship between the Company and the parties involved in the incident. It also includes threats or acts of violence that affect the business interests of the Company or that may lead to an incident of violence on Company premises. Threats or acts of violence occurring off Company premises that involve employees, agents, or individuals acting as a representative of the Company, whether as victims of or active participants in the conduct, may also constitute workplace violence. Specific examples of conduct that may constitute threats or acts of violence under this policy include, but are not limited to, the following:

- 1) Threats or acts of physical or aggressive contact directed toward another individual whether made orally or in writing;
- 2) Threats or acts of physical harm directed toward an individual or his/her family, friends, associates, or property;
- 3) The intentional destruction or threat of destruction of Company property or another employee's property;
- 4) Harassing or threatening phone calls or emails;
- 5) Surveillance;
- 6) Stalking (including cyber-bullying);
- 7) Veiled threats of physical harm or similar intimidation; and

PrivateSky® Aviation Services, Inc
Policy and Procedure Manual

- 8) Any conduct resulting in the conviction under any criminal code provision relating to violence or threats of violence that adversely affects the Company's legitimate business interests. Workplace violence does not refer to occasional comments of a socially acceptable nature. These comments may include references to legitimate sporting activities, popular entertainment or current events. Rather, it refers to behavior that is personally offensive, threatening or intimidating.

Enforcement:

Any person who engages in a threat or violent action on Company property may be removed from the premises as quickly as safety permits and may be required, at the Company's discretion, to remain off Company premises pending the outcome of an investigation of the incident.

When threats are made or acts of violence are committed by an employee, a judgment will be made by the Company as to what actions are appropriate with respect to that employee, including, but not limited to, notifying law enforcement, potential medical evaluation and/or disciplinary action, up to and including termination.

All employees of the Company have an affirmative duty to report any witnessed violence or threats of violence to a supervisor, COS, CEO, or Human Resources.

PrivateSky® Aviation Services, Inc
Policy and Procedure Manual

781 Photographic Equipment

Effective Date: 01/01/2023
Revision Date: 01/01/2023

Photographic equipment is not allowed on Company property unless prior approval from the CEO and a photo pass is obtained. It is prohibited to utilize the camera feature of personal cell phones anywhere in the facility. This policy also applies to visitors of PrivateSky®. No photos or selfies are to be taken, or autographs requested, of celebrities, athletes, politicians, media personalities, or business tycoons.