


# Employee Handbook

2022

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# General Information

## Welcome

Welcome to Brighton Securities. One of the keys to our success is hiring good employees. We have hired you because we believe you have the skills and the potential to help our Firm succeed. We expect employees to perform the tasks assigned to them to the best of their abilities. We believe that hard work and commitment will not only benefit Brighton Securities but will help give all our employees a sense of pride and accomplishment.

We are glad to have you as a member of our team. We hope that your employment proves mutually satisfying. Every employee has an important role in our operations, and we value the abilities, experience, and background that they bring with them. It is our employees who provide the services that our clients rely upon and enable us to grow and create new opportunities in the years to come.

Our management team intends to provide employees with all the support and the resources they will need to perform their job effectively. If, at any time, an employee needs assistance or guidance, the employee should not hesitate to ask any member of the management team.

Once again, welcome to Brighton Securities. We are glad to have you with us.

## About Our Firm

Brighton Securities has always emphasized that outstanding people are the key to our success. Our strength and future growth depend on the contributions made by you and each person within our organization. We are proud to have you as part of our team. To ensure continued success, we feel it is important that all employees understand our policies and procedures. This Employee Handbook will familiarize employees with the various aspects of working with us. We encourage all employees to use the Employee Handbook as a valuable resource for understanding our Firm.

**Firm Contact Information**

| Contact | E-mail | Telephone |
|---|---|---|
| Melissa Hawryschuk<br>**Chief Executive Officer** | mhawryschuk@brightonsecurities.com | 585.340.2211 |
| Lori Alberts<br>**Chief Compliance Officer**<br>**Chief Operating Officer** | lalberts@brightonsecurities.com | 585.340.2235 |
| Doug Hendee<br>**Chief Sales Officer** | dhendee@brightonsecurities.com | 585.340.2232 |
| Danielle R Wilkins<br>**Chief Administrative Officer** | dwilkins@brightonsecurities.com | 585.340.2228 |
| **Human Resources** | hr@brightonsecurities.com | 585.340.2214 |

## Purpose of Employee Handbook

This Employee Handbook contains information about the employment policies and practices of Brighton Securities. These policies reflect the Firm's values, and we expect each employee to read this Employee Handbook carefully as it is a valuable reference for understanding your job at Brighton Securities

This Employee Handbook supersedes all previously issued Employee Handbooks and any inconsistent verbal or written policy statements made or issued before this Employee Handbook. Except for the policy of at-will employment, Brighton Securities reserves the right to revise, delete, and add to the provisions of this Employee Handbook. All such revisions, deletions, or additions must be in writing. No oral statements or representations can change the provisions of this Employee Handbook.

None of our personnel documents and benefit plans, including this Employee Handbook, constitutes, or is intended to constitute, an express or implied contract guaranteeing continued employment, or any position or benefits, or any minimum duration of employment for any employee. No manager or employee has any authority to enter a contract of employment - express or implied - that changes or alters the at-will employment relationship. **Only the CEO or the CAO of the Firm, or their authorized representative, has the authority to enter into**

**an employment agreement that alters the at-will employment relationship as set forth below and any such agreement must be in writing and signed by the CEO or the CAO of the Firm, or their authorized representative**.

Not all the Firm's policies and procedures are set forth in this Employee Handbook. We have summarized only some of the more important ones. If an employee has any questions or concerns about this Employee Handbook or any other policy or procedure, please ask Human Resources or the CAO.

Nothing in this Employee Handbook or in any other document or policy is intended to violate any federal, state, or local law. Nothing in this Employee Handbook or in any other document or policy is intended to limit any concerted activities by employees relating to their wages, hours, or working conditions, or any other conduct protected by Section 7 of the National Labor Relations Act ("NLRA"). Furthermore, nothing in this Employee Handbook prohibits an employee from reporting concerns, making lawful disclosures, or communicating with any governmental authority about conduct the employee believes violates any laws or regulations.

## Employment At-Will

Employment with Brighton Securities is at-will unless state law provides otherwise. This means that employment may be terminated for any lawful reason or for no reason, with or without cause or notice at any time by the employee or by the Firm. Nothing in this Employee Handbook or any oral statement will limit the right to terminate the at-will employment relationship. This at-will employment policy is the sole and entire agreement between the employee and Brighton Securities as to the duration of employment and the circumstances under which employment may be terminated. No manager or employee has any authority to enter into a contract of employment - express or implied - that changes or alters the at-will employment relationship. **Only the CEO or the CAO of the Firm, or their authorized representative, has the authority to enter into an employment agreement that alters the at-will employment relationship, and any such agreement must be in writing and signed by the CEO or the CAO of the Firm, or their authorized representative. Any other oral or written statements shall not be binding on the Firm and are therefore unenforceable.**

# SECTION 1 - Commitment to Diversity

## 1.1 Equal Employment Opportunity

Brighton Securities is an equal opportunity employer. In accordance with applicable law, we prohibit discrimination against any applicant or employee based on any legally-recognized basis, including, but not limited to: race, color, creed, religion, sex (including pregnancy, childbirth or related medical conditions, gender identity/expression and transgender status), familial status, national origin, physical or mental disability (including gender dysphoria and being a certified medical marijuana patient), genetic information (including predisposing genetic characteristics), age (18 and over), veteran status, military status, sexual orientation, marital status, certain arrest or conviction records, domestic violence victim status, and political affiliation. The Firm will not tolerate discrimination or harassment based on an employee's membership in one or more of these protected categories, an employee's known relationship or association with a member of one or more of these protected categories, or any other characteristic protected by applicable federal, state, or local law. Our commitment to equal opportunity employment applies to all persons involved in our operations and prohibits unlawful discrimination by any employee, including managers and co-workers.

**Complaint Procedure**
Any employee who believes that they have been harassed, discriminated against or subject to retaliation by a co-worker, manager, agent, vendor or client of Brighton Securities Corp in violation of this policy, or who is aware of such harassment, discrimination of or retaliation against others, should immediately provide a written or verbal report to Human Resources, the CAO or the CEO.

After a report is received, management will take prompt action to conduct as thorough and objective an investigation as warranted under the circumstances. The investigation will be completed, and a determination made and communicated to the employee as soon as practical. The Firm expects that all employees fully cooperate with any investigation conducted by the Firm into a complaint of proscribed harassment, discrimination or retaliation, or regarding the alleged violation of any other Firm policies.

If we determine that this policy has been violated, remedial action will be taken, commensurate with the severity of the offense. Appropriate action will also be taken to deter any future harassment or discrimination prohibited by this policy. If a complaint of prohibited harassment, discrimination or retaliation is substantiated, appropriate disciplinary action, up to and including termination of employment, will be taken.

The Equal Employment Opportunity Commission ("EEOC") and equivalent state agencies will accept and investigate charges of unlawful discrimination or harassment at no charge to the complaining party.

**Protection against Retaliation**

Retaliation is prohibited against any person by another employee or by Brighton Securities for using this complaint procedure, reporting proscribed harassment, or for filing, testifying, assisting, or participating in any manner in any investigation, proceeding or hearing conducted by a governmental enforcement agency. Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit.

Employees should report any retaliation, or concerns about potentially retaliatory behavior, prohibited by this policy, or concerns about potentially retaliatory behavior, to Human Resources, the CAO or the CEO. Any report of retaliatory conduct will be investigated in a thorough and objective manner. If a report of retaliation is substantiated, appropriate disciplinary action, up to and including termination of employment, will be taken.

**Confidentiality During the Investigation**

Brighton Securities has a compelling interest in protecting the integrity of its investigations. The Firm strives to protect witnesses from harassment, intimidation and retaliation, prevent evidence from being destroyed, ensure that testimony is not fabricated, and to prevent a cover-up. We may decide in some circumstances that, in order to achieve these objectives, we must maintain the investigation and an employee's role in it in strict confidence. If an employee participating in an investigation that we determine requires this level of confidentiality, we will in turn require the employee not to discuss the investigation or any allegations until the conclusion of the investigation. We will notify affected employees of any such requirement as necessary and appropriate. If the Firm reasonably imposes such a requirement, and the employee does not maintain the necessary level of confidentiality, they may be subject to corrective action up to and including termination of employment.

## 1.2 Non-Harassment/Non-Discrimination

Brighton Securities is committed to maintaining a workplace free from all forms of unlawful harassment, including sexual harassment. Harassment based on any legally protected basis is a form of workplace discrimination. The Firm prohibits unlawful harassment against anyone, for any reason, including, but not limited to an individual's actual or perceived: race, color, creed, religion, sex (including pregnancy, childbirth or related medical conditions and transgender status), gender identity or expression, familial status, national origin, physical or mental disability (including gender dysphoria and being a certified medical marijuana patient), genetic information (including predisposing genetic characteristics), age (18 and over), veteran status, military status, sexual orientation, marital status, certain arrest or conviction records, domestic violence victim status, and any other status protected by law. All employees, interns, and non-employees conducting business in our workplace must refrain from engaging in unlawful harassment.

**Definition of Sexual Harassment**
Sexual harassment is a form of sex discrimination and is unlawful under federal, state, and (where applicable) local law. Sexual harassment includes harassment based on sex, sexual orientation, gender identity and the status of being transgender.

Sexual harassment includes unwelcome conduct which is either of a sexual nature, or which is directed at an individual because of that individual's sex when:

- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment, even if the complaining individual is not the intended target of the sexual harassment.
- Such conduct is made either explicitly or implicitly a term or condition of employment; or
- Submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual's employment.

A sexually harassing, hostile work environment consists of words, signs, jokes, pranks, intimidation or physical violence which are of a sexual nature, or which are directed at an individual because of that individual's sex. Sexual harassment also consists of any unwanted verbal or physical advances, sexually explicit derogatory statements or sexually discriminatory remarks made by someone which are offensive or objectionable to the recipient, which cause the recipient discomfort or humiliation, which interfere with the recipient's job performance.

Sexual harassment also occurs when a person in authority tries to trade job benefits for sexual favors. This can include hiring, promotion, continued employment or any other terms, conditions or privileges of employment. This is also called "quid pro quo" harassment.

Sexual harassment is offensive, is a violation of our policies, is unlawful, and may subject the Firm to liability for harm to targets of sexual harassment. Harassers may also be individually subject to liability. Employees of every level who engage in sexual harassment, including supervisors/managers who engage in sexual harassment or who allow such behavior to continue, will be penalized for such misconduct.

Any employee who feels harassed should report the harassment to the CEO, CAO or Human Resources so that any violation of this policy can be corrected promptly. Any harassing conduct, even a single incident, can be addressed under this policy.

**No Tolerance**

Workplace harassment will not be tolerated at Brighton Securities. All applicants, employees, interns (paid or unpaid), contractors and individuals conducting business with Brighton Securities are required to conduct themselves in a manner that prevents sexual or other forms of harassment in the workplace. Any employee or individual covered by this policy who engages in workplace harassment or retaliation will be subject to remedial and/or disciplinary action, up to and including termination. This policy is one component of Brighton Securities' commitment to

a discrimination-free work environment where all employees and interns are treated with dignity and respect.

**Examples of Sexual Harassment**

The following describes some of the types of acts that may be unlawful sexual harassment and that are strictly prohibited:

- Physical assaults of a sexual nature, such as:
- Touching, pinching, patting, grabbing, brushing against another employee's body or poking another employee's body.
- Rape, sexual battery, molestation or attempts to commit these assaults.
- Unwanted sexual advances or propositions, such as:
- Requests for sexual favors accompanied by implied or overt threats concerning the victim's job performance evaluation, a promotion or other job benefits or detriments.
- Subtle or obvious pressure for unwelcome sexual activities.
- Sexually oriented gestures, noises, remarks, jokes or comments about a person's sexuality or sexual experience, which create a hostile work environment.
- Sex stereotyping occurs when conduct or personality traits are considered inappropriate simply because they may not conform to other people's ideas or perceptions about how individuals of a particular sex should act or look.
- Sexual or discriminatory displays or publications anywhere in the workplace, such as:
- Displaying pictures, posters, calendars, graffiti, objects, promotional material, reading materials or other materials that are sexually demeaning or pornographic. This includes such sexual displays on workplace computers or cell phones and sharing such displays while in the workplace.
- Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity and the status of being transgender, such as:
- Interfering with, destroying or damaging a person's workstation, tools or equipment, or otherwise interfering with the individual's ability to perform the job.
- Sabotaging an individual's work.
- Bullying, yelling, name-calling.

**Definition of Other Unlawful Harassment**

The creation of an intimidating or hostile working environment, based on one or more of the above protected categories, constitutes unlawful harassment. Specific types of unlawful harassment, in addition to sexual harassment covered above, include, but are not limited to:

- Physical harassment refers to pushing, hitting, crowding, cornering or unwanted physical touching.
- Verbal abuse refers to verbal comments, including but not limited to jokes or the use of slurs or other offensive language regarding, or made because of, an individual's actual or perceived membership in one of the protected categories listed above.
- Written harassment refers to derogatory or degrading written comments regarding, or made because of, an individual's membership in one of the categories listed above. Specific examples include, but are not limited to e-mail, text messages, memos, notes, graffiti, other visual depictions or pictures, cartoons, drawing, videos.

- Inappropriate, unwelcomed behaviors, such as offensive gestures and wearing clothes, jewelry, signage, etc. known to be offensive to protected classifications; and
- Any other unwelcome conduct that has the purpose or effect of creating an intimidating, hostile, or offensive working environment as defined by law, or has the purpose or effect of unreasonably interfering with an individual's work performance or otherwise adversely affecting an individual's employment opportunities.

Unlawful harassment, whether it is physical, verbal or visual in nature, is a form of employee misconduct which undermines the integrity of the employment relationship within our Firm.

**Who Can Be a Target?**

Harassment can occur between any individuals, regardless of their sex or gender. New York Law protects employees, paid or unpaid interns, and non-employees, including independent contractors, and those employed by companies contracting to provide services in the workplace. A perpetrator of workplace harassment can be a superior, a subordinate, a coworker or anyone in the workplace including an independent contractor, contract worker, vendor, client, customer or visitor.

**Where Can Harassment Occur**

Unlawful harassment is not limited to the physical workplace itself. It can occur while employees are traveling for business or at employer-sponsored events or parties. Calls, texts, emails, and social media usage by employees can constitute unlawful workplace harassment, even if they occur away from the workplace premises, on personal devices or during non-work hours.

**Reporting Harassment**

Preventing workplace harassment is everyone's responsibility. Brighton Securities cannot prevent or remedy sexual harassment unless the Firm knows about it. Any employee, intern (paid or unpaid) or non-employee who has been subjected to behavior that may constitute unlawful harassment is encouraged to report such behavior to their supervisor/manager or the CEO, CAO or Human Resources. Anyone who witnesses or becomes aware of potential instances of workplace harassment should report such behavior to their supervisor/manager or the CEO, CAO or Human Resources.

Reports of workplace harassment may be made verbally or in writing. The written complaint form is in the appendix of this Employee Handbook. All employees are encouraged, but not required, to use this complaint form. Employees who are reporting potential harassment on behalf of other employees are also encouraged to use the complaint form and note that the complaint is being made on behalf of another employee.

Employees, interns (paid or unpaid) or non-employees who believe they have been a victim of workplace harassment may also seek assistance in other available forums, as outlined in the Legal Protections and External Remedies section of this policy.

Any employee who feels harassed should report the harassment so that any violation of this policy can be corrected promptly. Any harassing conduct, even a single incident, can be addressed under this policy.

**Leadership Responsibilities**

All supervisors/managers who receive a complaint or information about suspected workplace harassment, observe what may be harassing behavior or for any reason suspect that harassment is occurring, are required to report such suspected sexual harassment to the CEO, CAO or Human Resources.

In addition to being subject to discipline if they engaged in harassing conduct themselves, supervisors/managers will be subject to discipline for failing to report suspected workplace harassment or otherwise knowingly allowing workplace harassment to continue.

Supervisors/Managers will also be subject to discipline for engaging in any retaliation.

**Complaint Investigation**

***All*** complaints or information about suspected workplace harassment will be investigated, whether that information was reported in verbal or written form. Investigations will be conducted in a timely manner and will be confidential to the extent possible.

An investigation of any complaint, information or knowledge of suspected harassment will be prompt and thorough. All persons involved, including complainants, witnesses and alleged perpetrators, will be accorded due process, as outlined below, to protect their rights to a fair and impartial investigation.

Any employee may be required to cooperate as needed in an investigation of suspected workplace harassment. Brighton Securities will not tolerate retaliation against employees who file complaints, support another's complaint or participate in an investigation regarding a violation of this policy.

While the process may vary from case to case, investigations should be done in accordance with the following steps:

- Upon receipt of complaint, the CEO, CAO or Human Resources will conduct an immediate review of the allegations, and take any interim actions, as appropriate. If the complaint is verbal, the individual will be encouraged to complete the "Complaint Form" in writing. If he or she refuses, the CAO or Human Resources will prepare a Complaint Form based on the verbal report.
- If documents, emails or phone records are relevant to the allegations, steps will be taken to obtain and preserve them.
- The CEO, CAO or Human Resources will request and review all relevant documents, including all electronic communications.
- The CAO or Human Resources will interview all parties involved, including any relevant witnesses.

The CAO or Human Resources will prepare written documentation of the investigation (such as a letter, memo or email), which contains the following:

- A list of all documents reviewed, along with a detailed summary of relevant documents.
- A list of names of those interviewed, along with a detailed summary of their statements.
- A timeline of events.
- A summary of prior relevant incidents, reported or unreported; and
- The basis for the decision and final resolution of the complaint, together with any corrective actions action(s).

Written documentation and associated documents will be maintained by the Firm.

Following the investigation, the CAO or Human Resources will promptly notify the complainant and the individual(s) about whom the complaint was made of the final determination and implement any corrective actions identified in the written document.

The CAO or Human Resources will inform the complainant of their right to file a complaint or charge externally as outlined in the Legal Protections and External Remedies section of this policy.

**Corrective Action**

If a report of workplace harassment is found to be valid, immediate and appropriate corrective action will be taken. Employees or interns (paid or unpaid) who violate this policy, including the provision against retaliation, will be subject to disciplinary action, up to and including termination. This determination will be based on all the facts of the case.

**Retaliation**

Brighton Securities will not tolerate retaliation against anyone who, in good faith, complains or provides information about suspected harassment.

Unlawful retaliation can be any action that could discourage an employee from coming forward to make or support a workplace harassment claim including, but not limited to being discharged, disciplined, discriminated against, or otherwise subject to adverse employment action. Adverse action need not be job-related or occur in the workplace to constitute unlawful retaliation (e.g., threats of physical violence outside of work hours).

Retaliation is unlawful under federal, state, and (where applicable) local law. The New York State Human Rights Law protects any individual who has engaged in a “protected activity”. Protected activity occurs when a person has:

- made a complaint of harassment, either internally or with any anti-discrimination agency.
- testified or assisted in a proceeding involving harassment under the Human Rights Law or other anti-discrimination law.
- opposed harassment by making a verbal or informal complaint to management, or by simply informing a supervisor/manager of harassment.

- reported that another employee has been harassed; or
- encouraged a fellow employee to report potential harassment.

Even if the alleged harassment does not rise to the level of a violation of law, the individual is protected from retaliation if the person had a good faith belief that the practices were unlawful. However, the retaliation provision is not intended to protect persons making intentionally false charges of harassment.

**Legal Protections and External Remedies**

Harassment based on a protected class is against the law. All employees have a legal right to a workplace free from illegal harassment. Employees can enforce this right by filing a complaint internally with Brighton Securities, or with a government agency or in court under federal, state or local antidiscrimination laws.

Harassment is not only prohibited by Brighton Securities but is also prohibited by state, federal, and (where applicable) local law. Aside from the internal process at Brighton Securities Corp, employees may also choose to pursue legal remedies with the following governmental entities. While a private attorney is not required to file a complaint with a governmental agency, employees may seek the legal advice of an attorney.

**New York State Division of Human Rights (DHR)**

The Human Rights Law (HRL), codified as N.Y. Executive Law, art. 15, § 290 et seq., applies to employers in New York State regarding sexual harassment, and protects employees, paid or unpaid interns and non-employees, regardless of immigration status. A complaint alleging violation of the Human Rights Law may be filed either with DHR or in New York State Supreme Court.

Complaints with DHR may be filed any time **within three years** of the harassment. All other harassment complaints may be filed with the DHR any time within one year of the harassment. If an individual did not file at DHR, they can sue directly in state court under the HRL, within three years of the alleged discrimination. An individual may not file with DHR if they have already filed an HRL complaint in state court.

Complaining internally to Brighton Securities does not extend the time to file with DHR or in court. The one year or three years is counted from date of the most recent incident of harassment.

An attorney is not needed to file a complaint with DHR, and there is no cost to file with DHR. DHR will investigate the complaint and determine whether there is probable cause to believe that harassment/discrimination has occurred. Probable cause cases are forwarded to a public hearing before an administrative law judge. If harassment/discrimination is found after a hearing, DHR has the power to award relief, which varies but may include requiring the employer to take action to stop the harassment, or redress the damage caused, including paying monetary damages, attorney's fees and civil fines.

DHR's main office contact information is: NYS Division of Human Rights, One Fordham Plaza, Fourth Floor, Bronx, New York 10458, (718) 741-8400, www.dhr.ny.gov.

Contact DHR at (888) 392-3644 or visit dhr.ny.gov/complaint for more information about filing a complaint. The website has a complaint form that can be downloaded, filled out, notarized and mailed to DHR. The website also contains contact information for DHR's regional offices across New York State.

**United States Equal Employment Opportunity Commission (EEOC)**

The EEOC enforces federal anti-discrimination laws, including Title VII of the 1964 federal Civil Rights Act (codified as 42 U.S.C. § 2000e et seq.). An individual can file a complaint with the EEOC anytime within 300 days from the harassment. There is no cost to file a complaint with the EEOC. The EEOC will investigate the complaint and determine whether there is reasonable cause to believe that discrimination has occurred, at which point the EEOC will issue a Right to Sue letter permitting the individual to file a complaint in federal court.

The EEOC does not hold hearings or award relief but may take other action including pursuing cases in federal court on behalf of complaining parties. Federal courts may award remedies if discrimination is found to have occurred. In general, private employers must have at least 15 employees to come within the jurisdiction of the EEOC.

If an employee believes that he or she has been discriminated against at work, he or she can file a "Charge of Discrimination". The EEOC has district, area and field offices where complaints can be filed. Contact the EEOC by calling (800) 669-4000 / (800) 669-6820 (TTY), visiting their website at www.eeoc.gov or via email at info@eeoc.gov

If an individual filed an administrative complaint with DHR, DHR will file the complaint with the EEOC to preserve the right to proceed in federal court.

**Local Protections**

Many localities enforce laws protecting individuals from sexual harassment and discrimination. An individual should contact the county, city or town in which they live to find out if such a law exists.

**Contact the Local Police Department**

If the harassment involves physical touching, coerced physical confinement or coerced sex acts, the conduct may constitute a crime. Contact the local police department.

## 1.3 Disability Accommodation

To comply with applicable laws ensuring equal employment opportunities for individuals with disabilities, Brighton Securities will make reasonable accommodations for the known physical or mental limitations of an otherwise qualified individual with a disability who is an employee or applicant for employment unless undue hardship and/or a direct threat to the health and/or safety of the individual or others would result.

Any employee who requires an accommodation in order to perform the essential functions of their job, enjoy an equal employment opportunity, and/or obtain equal job benefits should contact Human Resources or the CAO to request such an accommodation. Human Resources will communicate with the employee and engage in an interactive process to determine the nature of the issue and what, if any, reasonable accommodation may be appropriate. In some cases, this interactive process may be triggered without a request from the employee, such as when the Firm receives notice from its own observation or another source that a medical impairment may be impacting the employee's ability to perform their essential job functions.

Employees who believe they need an accommodation must specify, preferably in writing, what barriers or limitations prompted the request. The Firm will evaluate the information obtained from the employee, and possibly their health care provider or another appropriate health care provider, regarding any reported or apparent barriers or limitations and will then work with the employee to identify possible accommodations, if any, that will help to eliminate or otherwise address the barrier(s) or limitation(s). If an identified accommodation is reasonable and will not impose an undue hardship on the Firm and/or a direct threat to the health and/or safety of the individual or others, the Firm will generally make the accommodation, or it may propose another reasonable accommodation that may also be effective. Employees are required to cooperate with this process by providing all necessary supporting documentation of supporting the need for accommodation and being willing to consider alternative accommodations when applicable.

The Firm will also consider requests for reasonable accommodations for medical conditions related to pregnancy, childbirth, and lactation were supported by medical documentation and/or as required by applicable federal, state, or local law.

Employees who wish to request unpaid time away from work because of a qualifying disability should speak to Human Resources or the CAO regarding a proposed accommodation.

## 1.4 Religious Accommodation

It is Brighton Securities' policy not to discriminate against any qualified employee or applicant with regard to any terms or conditions of employment because of such individual's religion or creed.

Consistent with this policy against discrimination, any employee whose religious practices conflicts with the employee's job, schedule, the employer's dress code, or with other aspects of the individual's employment and who requires a religious accommodation, may submit a request

in writing for an accommodation to Human Resources or the CAO. The request must include a description of the religious conflict and the employee's suggested accommodation(s).

Once the employee has submitted their written request for an accommodation, the Firm will evaluate the request, giving due consideration to whether a work conflict exists due to a sincerely held religious belief or practice and whether a reasonable accommodation exists which would not create an undue hardship on the Firm.

Human Resources or the CAO will meet with the employee to discuss the request and propose a reasonable accommodation, should one exist. If the employee accepts the Firm's proposed religious accommodation, the supervisor/manager and/or Human Resources or the CAO will implement the accommodation. If the employee rejects the proposed accommodation, the employee may lodge an appeal pursuant to Firm's Open-Door policy. Brighton Securities will provide reasonable accommodations of religion consistent with its obligations under applicable law.

**ADDITIONAL INFORMATION**
Employees who feel they have been unreasonably denied an accommodation should contact Human Resources or the CAO.

Employees with questions concerning this policy should contact Human Resources or the CAO.

## 1.5 Pregnancy Accommodation

### Accommodations

Employees and applicants for employment may request a reasonable accommodation for pregnancy-related conditions. For purposes of this policy, a "pregnancy-related condition" is a medical condition related to pregnancy or childbirth that inhibits the exercise of a normal bodily function or is demonstrable by medically accepted clinical or laboratory diagnostic techniques but does not prevent the employee from performing her job functions in a reasonable manner, with or without a reasonable accommodation. Reasonable accommodations may include but are not limited to: providing an accessible worksite; acquiring or modifying equipment; job restructuring and modifying work schedules.

### Certification Requirements

Employees may be required to provide medical or other information that is necessary to verify the existence of the pregnancy-related condition or that is necessary for the Firm's consideration of a reasonable accommodation. Such medical information will be kept confidential.

### Additional Information

Employees or applicants for employment who have questions about this policy or who wish to request a reasonable accommodation under this policy should contact Human Resources or the CAO.

## 1.6 Whistleblower Protection

Brighton Securities strives to protect its employees, business and community as best as possible. As a matter of policy and practice, as well as in compliance with various laws, we offer employees whistleblower protection when they report certain activities or make a complaint to management about a specific situation or occurrence in the workplace that may be unsafe, illegal, abusive or fraudulent. The complaint will be taken seriously and fully investigated possible. Employees who make complaints of this nature will be protected from retaliation.

### Making a Complaint

If an employee believes that a workplace activity or situation is unsafe, illegal, abusive or fraudulent, he/she should bring the problem to the attention of the CEO, CAO or Human Resources. Brighton Securities will, if appropriate, conduct a prompt and thorough investigation of the situation. Employees may report problems anonymously but should be aware that this may hamper Brighton Securities' ability to obtain further details, ask follow-up questions and/or otherwise conduct a complete, thorough investigation.

Problems that are covered by other Brighton Securities complaint procedures (e.g., employment discrimination, harassment) should be reported in the manner and to the individual(s) set out in those specific procedures and not under this policy.

### No Retaliation

Employees who make a complaint in good faith will not be retaliated against or subjected to any other adverse employment action. Retaliatory and adverse actions include, but are not limited to:

- Actions or threats against an employee in the terms of conditions of employment, including, but not limited to, discharge, suspension or demotion;
- Actions or threats to take such actions that would adversely impact a current or former employee's current or future employment; or
- Threatening to report an employee's suspected citizenship or immigration status, or that of the employee's family or household member, to a federal, state, or local agency

The employee's identity, if made known to Brighton Securities, will be protected by Brighton Securities to the greatest extent possible, consistent with applicable law and the need to investigate and remedy the situation. Any employee who believes he or she has been retaliated against in violation of this policy should notify the CEO, CAO or Human Resources immediately.

# SECTION 2 - General Employment Practices

## 2.1 Open Door Policy

We recognize that employees may have suggestions for improving our workplace, as well as complaints about the workplace. We feel that the most satisfactory solution to a job-related problem or concern is usually reached through a prompt discussion with Human Resources or the CAO and CEO. Employees should feel free to contact Human Resources or the CAO and CEO with any suggestions and/or complaints. If employees do not feel comfortable contacting Human Resources or are not satisfied with the response, they should contact the CEO.

While we provide employees with this opportunity to communicate their views, please understand that not every complaint can be resolved to the employee's satisfaction. Even so, we believe that open communication is essential to a successful work environment and all employees should feel free to raise issues of concern without fear of reprisal.

## 2.2 Employee Classifications

Employees of Brighton Securities are classified as either exempt or non-exempt under federal and state wage and hour laws and are further classified for administrative purposes. The following designations are used throughout this Employee Handbook.

**Exempt Employees**
Exempt employees are employees whose job assignments meet specific tests established by the federal Fair Labor Standards Act ("FLSA") and state law and who are exempt from minimum wage and overtime pay requirements. Exempt employees are compensated on a salary basis. Employees will be informed whether their status is exempt or non-exempt and should consult Human Resources, or the CAO, with any questions or concerns regarding this status.

**Non-Exempt Employees**
Non-exempt employees are employees whose job positions do not meet FLSA or applicable state exemption tests, and who are not exempt from minimum wage and overtime pay requirements. Non-exempt employees are eligible to receive overtime pay for hours worked in excess of 40 hours in a given week, or as otherwise required by applicable state law. Employees will be informed whether their status is exempt or non-exempt and should consult Human Resources, or the CAO, with any questions or concerns regarding this status.

**Full-Time Employees**
Full-time employees are those who are normally scheduled to work and who do work a schedule of 40 hours or more per week. Full-time employees are generally eligible for the employee benefits described in this Employee Handbook and are provided with benefits required by applicable law.

**Part-Time Employees**
Part-time employees are those who are normally scheduled to work and who do work fewer than 40 hours per week. Part-time employees may be assigned a work schedule in advance or

may work on an as-needed basis. Part-time employees are provided with benefits required by applicable law.

**Seasonal Employees**
Seasonal employees are those who are employed for short-term assignments. Seasonal employees are generally hired to temporarily supplement the workforce or assist in the completion of a specific project. These seasonal employment assignments are of limited duration. Seasonal employees are not eligible for employee benefits, except as required by applicable law, and may be classified as exempt or non-exempt based on job duties and compensation.

**Commission-Based Employees**
Employees in this category are encouraged to work regular business hours but ultimately determine their own work schedule. Commission-based employees are provided with benefits required by applicable law.

## 2.3 Employee Eligibility & Work Authorization

Brighton Securities is committed to employing only individuals who are authorized to work in the United States and who comply with applicable immigration and employment law. As a condition of employment, every individual must provide satisfactory evidence of their identity and legal authority to work in the United States within three business days of commencing employment. If the employee cannot verify their right to work in the United States within three business days of beginning employment, the Firm will be required to terminate their employment immediately.

## 2.4 Access to Personnel Files

Employees may inspect their own personnel file in the presence of a representative of Brighton Securities Employees should contact their manager to schedule a time. Employees may not be allowed to view investigation records or any letters of reference that have been prepared or collected by management. Employees will be provided access to personnel records in accordance with applicable state law.

The Firm will cooperate with, and provide access to an employee's personnel file to, law enforcement officials or federal, state, or local agencies in accordance with applicable law.

## 2.5 Background Checks

The Firm recognizes the importance of maintaining a safe, secure workplace with employees who are qualified, reliable, and non-violent, and who do not present a risk of serious harm to their co-workers or others. To promote these concerns and interests, the Firm reserves the right to investigate an individual's prior employment history, personal references, and educational background, as well as other relevant information. Consistent with legal or contractual requirements, the Firm also reserves the right to obtain and to review an applicant's or an employee's criminal conviction record, and related information, and to use such information when making employment decisions, but only to the extent permissible under applicable law.

A pending criminal matter may be considered in appropriate circumstances for business-related reasons, consistent with applicable law. All background checks will be conducted in strict conformity with the federal Fair Credit Reporting Act ("FCRA"), applicable state fair credit reporting laws, and state and federal anti-discrimination and privacy laws. The Firm is an equal opportunity employer and will comply with applicable federal, state and local laws relating to the use of background checks for employment purposes.

## 2.6 Reference Checks

So that the Firm can handle requests for job references in a consistent, fair, and lawful manner, all requests for official job references on behalf of the Firm should be forwarded to Human Resources or the CAO. In response to job reference requests, Brighton Securities will only confirm current or former employees' dates of employment and job title. If a current employee submits written authorization, the Firm will also provide information regarding salary or wage history.

## 2.7 Personal Information Changes

To better assist employees and/or their families in the event of personal emergencies, Brighton Securities needs to maintain up-to-date contact information. Maintaining accurate information in our files is also important for recordkeeping, payroll, and benefits related purposes.

Changes in name, address, telephone number, marital status, number of dependents, next of kin, and/or beneficiaries should be given to Human Resources promptly.

## 2.8 Performance Reviews

Performance evaluations are generally scheduled once a year or upon a change in assignments, however, managers and employees are strongly encouraged to discuss job performance and goals on an informal, day-to-day basis.

A positive performance review does not guarantee a salary increase or a promotion. These decisions are made at the discretion of the Firm and depend on several factors in addition to an employee's individual performance.

We reserve the right to make any personnel changes (including termination) before or after performance evaluations.

# SECTION 3 – Workplace Conduct

## 3.1 Standards of Conduct

To ensure safety and security and provide the best possible work environment, we expect employees to follow basic, common-sense rules of conduct that will protect everyone's interests and safety.

**Initial Discussions**

Before taking corrective action, the supervisor/manager will meet with the employee to explain why the need for corrective action is warranted.

It is not possible to list all forms of behavior that are considered unacceptable in the workplace, but the following are examples of infractions that may result in disciplinary action, including suspension, demotion or termination of employment:

- Falsification of employment records, employment information or other records.
- Recording the work time of another employee, allowing any employee to record another employee's work time, or allowing falsification of any time record
- Theft or the deliberate or careless damage of any Company property or the property of any employee or client.
- Use of Company materials, supplies, tools or products for personal reasons without advanced permission from the CEO or CAO
- Abuse of the Firm's electronic resources, including sending personal emails during working time or in a manner that interferes with the employee's work performance.
- Possessing, distributing, selling, transferring, using, or being under the influence of alcohol or illegal drugs in the workplace.
- Provoking a physical fight or engaging in physical fighting during working hours or on premises owned or occupied by the Firm.
- Carrying firearms, weapons or dangerous substances at any time, on premises owned or occupied by the Firm, unless state law provides otherwise or pre-approved by the CAO or CEO for firm-related events.
- Using abusive, violent, threatening or vulgar language at any time during working hours or while on premises owned or occupied by the Firm.
- Failing to obtain permission to leave work during normal working hours.
- Failing to observe working schedules, including meal and rest breaks.
- Working overtime without authorization or refusing to work assigned hours.
- Violating any safety, health or security policy, rule or procedure of the Firm; and
- Committing a fraudulent act or intentional breach of trust under any circumstances.

**Corrective Action**

Depending upon the severity of the matter, disciplinary measures may include counseling, verbal warning, written warning, suspension, demotion, transfer or termination. The Firm will

determine the appropriate corrective action and does not guarantee that one form of action will necessarily precede another.

**At-Will Employment**

Although employment may be terminated at-will by either the employee or the Firm at any time, without following any formal system of discipline or warning, we may exercise discretion to utilize forms of discipline that are less severe than termination. Examples of less severe forms of discipline include verbal warnings, written warnings, performance improvement plans, demotions, and suspensions.

Although one or more of these forms of discipline may be taken, no formal order or procedures are necessary. The Firm reserves the right to determine which type of disciplinary action to issue in response to any type of performance issue or rule violation.

This statement of prohibited conduct does not alter or limit the policy of at-will employment. Either the employee or the Firm may terminate the employment relationship at any time for any reason, with or without cause, and with or without notice.

As previously set forth in this Employee Handbook, only the CEO, CAO or his or her authorized representative has the authority to enter into an employment agreement that alters the at-will employment relationship, and any such agreement must be in writing and signed by the CEO, CAO or his or her authorized representative.

## 3.2 Business Ethics

**We Encourage a Speak Up Culture**

Choosing to speak up about workplace concerns helps build a healthy, ethical, and compliant Firm and is part of our culture. To promote that culture, the Firm encourages employees to speak up and raise questions and concerns promptly about any situation that may violate our Code of Conduct, our core values or our policies. At Brighton Securities, our people are our most valuable asset. It benefits all of us if we raise our concerns, so the Firm may consider them carefully and address them properly.

**Follow the Firm's Commitment to our Code and the Law**
The Firm is deeply committed to promoting a culture of ethical conduct and compliance with:

- Our Code, Core Values, and policies.
- The laws, rules, and regulations that govern our business operations; and
- Best practices in accounting, auditing and financial reporting matters.

We expect all our employees, officers, directors, and agents to follow this commitment in all aspects of their work.

**Raise Good Faith Questions and Concerns about Conduct that may Violate our Code**

Consistent with our commitment to ethics, compliance, and the law, we welcome good faith questions and concerns about any conduct an employee believes may violate our Code, especially conduct that may be illegal, fraudulent, unethical or retaliatory. For purposes of this policy, and because our Code captures standards of ethics and compliance at a broad level, references to our "Code" should be read to encompass all our obligations to perform our jobs in a manner that is consistent with the Firm's policies and procedures, as well as applicable laws.

We promote an environment that fosters honest, good faith communications about matters of conduct related to our business activities, whether that conduct occurs within Brighton Securities, involves one of Brighton Securities' contractors, suppliers, consultants, or clients, or involves any other party with a business relationship to Brighton Securities

Other parts of this Employee Handbook address the confidentiality of the Firm's trade secrets and other proprietary information. Employees should note that in raising any questions or concerns they may have about potentially illegal conduct, pursuant to the 2016 Defend Trade Secrets Act ("DTSA"):

- No individual will be held criminally or civilly liable under federal or state trade secret law for disclosure of a trade secret (as defined in the Economic Espionage Act) that is:
    - Made **in confidence to** a federal, state, or local government official, either directly or indirectly, or to an attorney, and made **solely for the purpose of** reporting or investigating a suspected violation of law; or
    - Made in a complaint or other document filed in a lawsuit or other proceeding, **if such filing is made under seal,** so that it is not made public.
- An individual who pursues a lawsuit for retaliation by an employer for reporting a suspected violation of the law may disclose the trade secret to the attorney of the individual and use the trade secret information in the court proceeding, if the individual files any document containing the trade secret under seal, and does not disclose the trade secret, except as permitted by court order.

**The Firm Does Not Tolerate Retaliation**

Coming forward with questions or concerns may sometimes feel like a difficult decision, but we are committed to fostering an environment that does not deter individuals from speaking up when they observe conduct that may violate our Code. For that reason, the Firm will not tolerate retaliation of any kind because an employee in good faith raises a question or concern about a violation or suspected violation of our Code, our policies, or the laws and regulations under which we do business, or because the employee participates in or cooperates with an investigation of such concerns.

Retaliation is any conduct that would reasonably dissuade an employee from raising, reporting, or communicating about good faith concerns through our internal reporting channels or with any governmental authority or from participating in or cooperating with an investigation or legal proceeding raising such concerns.

Retaliation may occur through conduct or written communication and may take many forms, including actual or implied threats, verbal or non-verbal behaviors, changes to the terms or conditions of employment, coercion, bullying, intimidation, or deliberate exclusionary behaviors.

The following are examples of potential retaliation the Firm prohibits:

- Adverse employment action affecting an employee's salary or compensation.
- Demotion, suspension, or termination of employment.
- Taking away opportunities for advancement.
- Excluding an employee from important meetings.
- Threatening, or otherwise harassing or bullying, an employee who has made a report.
- Directing an employee who has made a report not to report to outside regulators.
- Deliberately rude or hostile behaviors or speech; and
- Creating or allowing the creation of a work atmosphere that is hostile toward an employee who has reported a concern.

It is the Firm's policy to adhere to all applicable laws protecting our employees against unlawful retaliation or discrimination as a result of their raising good faith questions or concerns. We expect any employee who becomes aware of an instance or threat of retaliation, to report it immediately.

Please note that nothing in this policy prevents the Firm from taking appropriate disciplinary or other legitimate employment action consistent with its usual disciplinary practices and the law. In addition, this policy prohibits and does not protect employees who knowingly and intentionally raise false concerns or reports.

**How to Raise Questions and Concerns**
Employees can submit their good faith questions or concerns about conduct they believe may violate our Code, our policies, or the laws and regulations under which we do business to:

- Human Resources
- The CAO
- The CEO

When an employee raises a concern, the Firm will fully maintain confidentiality possible, consistent with applicable legal requirements, and the need to conduct an adequate investigation or review. Please note that employees can submit concerns anonymously and confidentially.

When raising concerns, we ask that employees provide as much detailed information as possible, including the background and history of the concern, names, dates and places where possible, and the reasons why the situation is cause for concern. This is especially important for concerns raised anonymously, so that the Firm may conduct an appropriate review and, if necessary, begin an investigation.

Please note as well that Brighton Securities does not prohibit anyone from electing to report concerns, make lawful disclosures, or communicate with any governmental authority about conduct believed to violate laws or regulations.

**What Brighton Securities Will Do**
Brighton Securities is committed to reviewing all reported concerns, conducting proper, fair and thorough investigations tailored to the circumstances, and taking appropriate remedial and concluding steps as warranted. All action taken by the Firm in response to a concern will necessarily depend on the nature and severity of the concern. This may include initial inquiries and fact-gathering to decide whether an investigation is appropriate and, if so, the form and scope of the investigation. Note that an investigation into concerns raised is not an indication that they have either been confirmed or rejected. The Firm complies with the law in conducting investigations. The Firm also expects that employees will provide truthful information when participating in an investigation.

Remember, all good faith concerns and reports raised under this policy will be taken seriously.

**Adherence to This Policy**
Employees who believe that they have been subjected to any conduct that violates this policy may register a complaint using the procedures outlined above. Any employee who unlawfully discriminates or retaliates against another employee as a result of their protected actions as described in this policy will be subject to corrective action, up to and including termination.

## 3.3 Confidential Firm Information

The Firm's confidential and proprietary information is vital to its current operations and future success. Each employee should use all reasonable care to protect or otherwise prevent the unauthorized disclosure of such information.

In no event should employees disclose or reveal confidential information within or outside the Firm without proper authorization or purpose.

"Confidential information" refers to a piece of information, or a compilation of information, in any form (on paper, in an electronic file, or otherwise), related to the Firm's business that the Firm has not made public or authorized to be made public, and that is not generally known to the public through proper means.

By way of example, confidential or proprietary information includes, but is not limited to, non-public information regarding the Firm's business methods and plans, databases, systems, technology, intellectual property, know-how, marketing plans, business development, products, services, research and development, inventions, financial statements, financial projections, financing methods, pricing strategies, client sources, employee health/medical records, system designs, client lists, and methods of competing. Subject to applicable federal, state or local laws, confidential or proprietary information may also include information marked “Confidential” or bearing any similar indications of the intent to keep such information confidential, regardless of whether the information would otherwise appear to be confidential. Additionally, employees who

by virtue of their performance of their job responsibilities have the following information, should not disclose such information for any reason, except as required to complete job duties, without the permission of the employee at issue: Social Security Numbers, driver's license or resident identification numbers, financial accounts, credit or debit card numbers, security and access codes or passwords that would permit access to medical, financial, or other sensitive personal, identifying, or other legally protected information.

Confidential information does not include information lawfully acquired by non-management employees about wages, hours, or other terms and conditions of employment, if used by them for purposes protected by Section 7 of the National Labor Relations Act such as joining or forming a union, engaging in collective bargaining, or engaging in other concerted activity for their mutual aid or protection.

Nothing in this Employee Handbook prohibits an employee from communicating with any governmental authority or making a report in good faith and with a reasonable belief of any violations of law or regulation to a governmental authority, or disclosing confidential information which the employee acquired through lawful means in the course of their employment to a governmental authority in connection with any communication or report, or from filing, testifying, or participating in a legal proceeding relating to any violations, including making other disclosures protected or required by any whistleblower law or regulation to the Securities and Exchange Commission, the Department of Labor, or any other appropriate government authority.

Further, employees are hereby notified that, under the 2016 Defend Trade Secrets Act ("DTSA"):

- No individual will be held criminally or civilly liable under federal or state trade secret law for the disclosure of a trade secret (as defined in the Economic Espionage Act) that:
    - Is made **in confidence to** a federal, state or local government official, either directly or indirectly, or to an attorney; and made **solely for the purpose of** reporting or investigating a suspected violation of law; or
    - Is made in a complaint or other document filed in a lawsuit or other proceeding, **if such filing is made under seal** so that it is not made public.
- An individual who pursues a lawsuit for retaliation by an employer for reporting a suspected violation of the law may disclose the trade secret to the attorney of the individual and use the trade secret information in the court proceeding, if the individual files any document containing the trade secret under seal, and does not disclose the trade secret, except as permitted by court order.

## 3.4 Use of Firm Property

Firm Equipment
When using Firm property, employees are expected to exercise care, maintain the property in safe working order, and follow all operating instructions, safety standards and guidelines.

Employees should notify Human Resources, or the CEO, if any equipment, machines, or tools appear to be damaged, defective or in need of repair. Prompt reporting of damages, defects, and

the need for repairs could prevent deterioration of equipment and possible injury to employees or others. Employees who have questions about their responsibility for maintenance and care of equipment used on the job should consult Human Resources, or the CEO.

All employees are expected to comply with all federal, state, and local laws while operating Firm equipment. The Firm may discipline employees who engage in unlawful conduct.

Firm Resources
The Firm has significantly invested in telephone lines, fax machines, photocopiers, and other types of business equipment, internet access and software that are vital to keeping our operations flowing smoothly and effectively. The Firm's resources are limited and, except as provided in **policy 8.1, Use of Electronic Resources**, should be used for business transactions only and not for personal use, unless explicitly authorized by Human Resources or the CAO.

## 3.5 Protection of Employee Personal Information

Brighton Securities recognizes and respects the privacy of applicants, employees and others about personal information it obtains through the hiring process and the employment relationship.
As evidence of our commitment in this regard, this policy provides information regarding the processing of personal information about employees and describes the Firm's general practices regarding employee privacy. Since privacy laws and business practices vary from state to state, implementation of these practices may also vary to accommodate local rules. This may involve adopting different standards as required by local law or diverging from the principles set out in this policy where Brighton Securities is not required to follow practices either by local law or by contractual commitments. The Firm will only engage in variation from these principles if it has a legitimate, business or legal reason to do so and not in an arbitrary or capricious manner.

This policy regulates collection and use of information about the Firm's prospective, current and former employees and the limited amount of personal information that Brighton Securities may collect about employee family members (together, employee personal information). References in this policy to employees should be interpreted accordingly. The policy is not limited to information held by Human Resources/Administration. The policy regulates all employee personal information held by Brighton Securities

Where Brighton Securities collects employee personal information, it will take steps to inform the employees concerned of the purposes for which the information will be used and provide them with any further information that is necessary to ensure that the employee personal information is used fairly. For example, where employees are asked to provide personal information about themselves, the Firm will explain whether provision of the information is mandatory or voluntary and any consequences of not providing the requested information.

Notification to employees need not be provided, however, where:

- Employee personal information is not collected directly from the individual concerned and to contact that individual directly would be disproportionate (for example, where an employee provides information about his or her family member, Brighton Securities will not usually contact the family member).

- The employees concerned already have sufficient information (for example, through this policy or other Brighton Securities policies or general notices).

The following paragraphs set out general information about the Firm's collection and use of employee personal information. This information is not intended to be comprehensive:

**Purposes**
Human Resources/Administration collects and uses employee personal information to process payroll payments, to determine benefits eligibility and process benefit payments, to analyze compensation costs and training needs and to determine employee eligibility for different responsibilities. Depending on which business unit an employee works for, additional information may be collected for purposes of complying with regulatory requirements. Information may also be collected to meet legally mandated obligations (such as tax and U.S. Equal Employment Opportunity requirements), to ensure compliance with Brighton Securities policies, and to protect the Firm, the workforce and the public against injury, theft, legal liability, fraud or abuse. Information (such as emergency contact information) is also collected from employees for use in connection with disaster recovery and business continuity efforts.

**Disclosures and International Transfers**
Employee personal information may be shared between the Firm and its service providers. Without intending to provide an exhaustive list of examples, it may be disclosed in connection with legal proceedings, investigations, or as required by law, regulation or relevant authority. It may also be disclosed to prospective buyers, business partners or other transferees of the business unit in which an employee works in the event of a potential sale, transfer or joint venture involving the unit or the investigation/negotiations which precede the transaction. This sharing, and these other disclosures, may involve transfers of personal information to any country in the world, including to countries which do not have strong data privacy laws. The Firm will, nevertheless, use all reasonable commercial efforts to protect employee personal information in accordance with this policy.

**General "Air Processing Principles"**
The Firm will only collect and use employee personal information fairly and lawfully. The Firm will take reasonable steps to ensure that it does not collect or use irrelevant, excessive or inadequate employee personal information and that the employee personal information it holds is accurate and, where relevant, up to date.

In particular, the Firm will only collect and use employee personal information:

- As necessary for the purposes of its legitimate interests which are not overridden by the rights, freedoms or legitimate interests of the employees concerned; or
- With the consent of the employees concerned; or
- Where the collection or use has been approved by the Firm's Legal Department as justified under applicable data privacy law.

**Security**
The Firm will use commercially reasonable efforts to ensure that it has in place appropriate technical and organizational security measures to protect employee personal information against

accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure or access and all other unlawful forms of processing.

Where the Firm contracts with third party service providers to collect and/or process employee personal information on its behalf, it will ensure that the service providers are bound by written agreements requiring them to process the information only on the instructions of the Firm and to have appropriate technical and organizational security measures in place to protect the information.

**Retention and Destruction**
The Firm will follow data retention and destruction policies and processes designed to ensure that employee personal information is deleted when it is no longer needed for the purposes for which it is collected and used.

**Direct Marketing**

The Firm will not share employee personal information for direct marketing purposes outside of the Firm.

**More Information**
Employees who have a reason to believe that their PII and/or the Firm's proprietary data has been breached should notify the CAO or Human Resources. Employees should also notify the CAO or Human Resources if they have knowledge of any company representative not adhering to this policy.

Violations of this policy may result in disciplinary action, up to and including termination of employment.

## 3.6 Conflicts of Interest

Employees must conduct themselves in such a way as to avoid actual or potential conflicts of interest. The following are examples of prohibited conflicts of interest in any aspect of their jobs:

- Acting as a director, officer, consultant, agent or employee of a supplier, client, competitor, or any entity that engages in business with the Firm.
- Owning a material interest in or being a creditor of or having other financial interest in a supplier, client, competitor, or any entity that engages in business with the Firm.
- Receiving from or giving to any client or competitor gifts, gratuities, special allowances, discounts, or other advantages not generally available to employees of the Firm.
- Having any significant direct or indirect personal interest in a business transaction involving the Firm.
- Conducting outside activities that materially detract from or interfere with the full and timely performance of an employee's services for the Firm; or
- Influencing commercial transactions involving purchases, contracts or leases in a way that would have a negative impact on the Firm or its business.

Employees who find that they have, or is considering the assumption of, a financial interest or outside employment relationship that might involve a conflict of interest, or who are in doubt concerning the proper application of this policy, should promptly discuss the matter with Human Resources, or the CAO, and refrain from exercising responsibility on the Firm's behalf in any manner that might reasonably be affected by any adverse interest.

Failure to disclose the fact of a conflict or potential conflict may constitute grounds for disciplinary action up to and including termination of employment.

This policy in no way prohibits employee affiliations or activities communications that are protected under applicable federal and state laws, including but not limited, to any activity that is protected under Section 7 of the National Labor Relations Act, which includes the right of employees to organize collectively and to speak with others about their terms and conditions of employment.

## 3.7 Social Media

Brighton Securities believes that there is value in a thriving online community, and we support blogging and social networking as valuable components of social media. While the Firm supports participation in blogging and social networking, participation in blogging and social networking is identified by the Firm as a voluntary act of its employees. This policy regarding personal blogs/webpages, and other social media content, has been developed for employees who maintain or participate in personal blogs, webpages, or other social media communications that may contain postings about the Firm, its programs, fellow Firm employees, and others who may be associated with the Firm. The policy also contains guidelines which describe the types of content that may violate **policy 3.1, Standards of Conduct**, and some of the legal implications of participating in social media activities. If applicable, compliance with FINRA requirements is required.

***Important: Nothing in this social media policy is intended to, or should be construed to limit, interfere with, restrain, or prevent employee communications regarding wages, hours, or other terms and conditions of employment protected under Section 7 of the National Labor Relations Act, or any other federal or state laws protecting this type of communication. Employees have the right to engage in or refrain from such activities.***

In general, what employees do on their own time is their own business. On the other hand, activities outside of work that affect job performance, the performance of others, or the interests of the Firm and our clients are governed by Firm policies and guidelines. For this reason, subject to the italicized paragraph above, before discussing Brighton Securities, its business, the people associated with the Firm, or its clients on any blog, webpage, or other social media outlet, employees should ensure that they are familiar with these guidelines, all Firm personnel policies, and the Firm’s Standards of Conduct.

Brighton Securities cannot assume responsibility or liability for opinions employees may express via a blog or other social media outlet. Since employees engage in all activity at their own risk, they may want to seek legal counsel if they have questions about postings or communications.

**Confidential, Proprietary, and Private Information**

Any confidential, proprietary, or trade secret information, as defined in **policy 3.3, Confidential Firm Information** is off-limits for employees' blogs or webpages, the blogs or websites maintained by other people, or any other social media outlets. The Firm logo and trademarks are off-limits as well.

Disclosing confidential, proprietary, and/or otherwise private information concerning the Firm, clients, visitors, projects, services, or any other protected information can negatively impact the Firm and may result in legal liabilities for the Firm.

***Important: Nothing in this policy is intended to, or should be construed to limit, interfere with, restrain, or prevent employee communications regarding trade secrets protected under the Defend Trade Secrets Act, or any other federal or state laws protecting this type of communication. Employees have the right to reveal the business' trade secrets to the government as part of any violations they report.***

**Brighton Securities' Standards of Conduct**

All our employees receive and are required to acknowledge the Firm's Standards of Conduct, as well as a copy of the Firm's Employee Handbook and to be familiar with these documents. Employees responsible for blogs, blog postings, and other social media activities which violate the Standards of Conduct, or other Firm employment policies, may be subject to corrective action, up to and including termination of employment. All corrective action taken under this policy is subject to the National Labor Relations Act, and any other applicable federal or state laws.

**Best Practice Guidelines**

These guidelines provide a roadmap for constructive, respectful, and productive dialogue both on-line and in person.

All Brighton Securities employees can be viewed (correctly or incorrectly) as representatives of the Firm, which can add significance to an employee's public comments. Brighton Securities therefore requests that, if an employee identifies themselves in their public comments as a Firm employee, they should notify Human Resources or the CEO. No employee will be disciplined for any comments or activities that are protected under federal or state laws.

Employees should be sure to provide enough support in their posting to help others understand the reasoning for their post, whether it is positive or negative. We appreciate the value of multiple perspectives, so help us to understand these opinions by providing context. Whether an employee is posting in praise or criticism of the Firm, they are encouraged to develop a thoughtful argument.

When an employee publishes their own blog(s), or participate in other social media activities, they should ensure others understand that their views and opinions are their own and do not represent the views and opinions of the Firm. If an employee publishes their own blog(s), or use

another type of social media outlet, they should include standard disclaimer language such as: "*The postings and views on this site are my own and do not represent the positions, views, or opinions of Brighton Securities"*.

Finally, remember that *every employee at Brighton Securities is required to comply with all applicable privacy laws and regulations*. We also expect that every employee will be respectful of the privacy and dignity of their fellow employees, their families, anyone associated with the Firm, and their individual circumstances.

## 3.8 Outside Employment

We hope that employees will not find it necessary to seek additional outside employment. However, if an employee is planning to accept an outside position, they must notify the CAO and their manager in writing. Outside employment must not conflict in any way with the employee's responsibilities within our Firm or financial industry regulations. Employees may not work for competitors or take an ownership position with a competitor. Employees may not conduct outside work or use Firm property, equipment or facilities in connection with outside work while on Firm time.

## 3.9 No Solicitation

The Firm has established the following rules applicable to all employees and non-employees that govern solicitation, distribution of written material and access to Firm property:

- Employees may engage in solicitation activities only during non-working times. No employee may engage in solicitation during their working time or during the working time of the employee or the employees at whom such activity is directed.
- Employees may distribute or circulate any written or printed material only in non-work areas, during non-working times. No employee may distribute or circulate any written or printed material in work areas at any time, or during their working time or during the working time of the employee or employees at whom such activity is directed.
- Non-employees are not permitted to solicit or to distribute written material for any purpose on Firm property; and

Off-duty employees are not permitted in work areas except for certain activities, such as picking up pay stubs or pay checks or to address similar employment-related concerns, attending social events.
Strict compliance with these rules is required.

As used in this policy, "working time" includes all time for which an employee is paid and/or is scheduled to be performing services for the Firm; it does not include break periods, meal periods, or periods in which an employee is not performing and is not scheduled to be performing services or work for the Firm.

## 3.10 Personal Appearance & Grooming

The image Brighton Securities projects to the public is reflected in the appearance of our employees. Simply stated, employees should look neat, clean, and well-groomed and should be dressed appropriately for the business environment. Employees are expected to use good judgment in their appearance and grooming, keeping in mind the nature of the work, their own safety, and the safety of co-workers, and their need to interact with the public.

Employees who are in the office for a partial day are expected to wear business attire if they will remain in the office longer than two hours. Employees who are in the office for less than two hours may wear business casual attire.

Business casual attire includes:

- Collared shirts.
- Long slacks.
- Non-denim pants.
- Skirts; and
- Dresses

Inappropriate attire for the workplace includes, but is not limited to:

- Denim of any color.
- Midriff tops.
- Suggestive clothing (too tight, short, or transparent).
- Visible tattoos which may be deemed as offensive.
- Facial piercings, other than in the ear.
- Golf or tennis attire.
- Open Collared or polo shirts.
- Casual t-shirt.
- Sweatshirts.
- Sneakers; and
- Corduroy pants.

We encourage employees to seek the advice of their manager or Human Resources or the CAO if they have questions regarding appropriate dress or appearance at work. Employees who report to work improperly dressed or groomed may be instructed by their manager to return home to change. The time that non-exempt employees are absent for this purpose will be unpaid unless state law requires otherwise.

**Religious, Medical, Gender Identity, and Disability Accommodations**
The Firm will reasonably accommodate an employee's religious beliefs, medical condition, gender identity, or disability by making exceptions to this policy, to the extent that doing so does not impose an undue hardship on the Firm. Employees who need such an accommodation should contact Human Resources or the CAO.

## 3.11 Attendance & Punctuality

Employees are expected to be regular in attendance and to be punctual. Any tardiness or absence causes problems for fellow employees and managers. If employees are absent, their workload must be performed by others, just as they must assume the workload of others who are absent. To limit problems caused by employee absences or tardiness, we have adopted the following policy that applies to absences not previously approved by the Firm.

Employees are expected to report to work as scheduled, be on time and be prepared to start work. Employees are also expected to remain at work for their entire work schedule, except for meal or break periods, or when required to leave on authorized Firm business or otherwise authorized to leave. Non-approved late arrivals, early departures, or other absences from scheduled hours are disruptive and must be avoided.

If employees are unable to report for work on any day, they must call their manager as soon as practical, before the time the employee is scheduled to begin working for that day. Subject to applicable federal, state and local laws, employees who do not comply with this policy may be subject to discipline up to and including termination of employment. The Firm may inquire about the general reason for an absence or tardiness. Unless extenuating circumstances exist, employees must call in on each day they are scheduled to work but will not report to work.

Excessive absenteeism or tardiness may result in disciplinary action, up to and including termination of employment, unless the absence or tardiness is legally protected. The following types of time off will not be considered grounds for disciplinary action under this policy:

- Excused time off, including paid time off (“PTO”) and other forms of paid time off.
- Sick leave provided under a mandatory sick leave law.
- Approved leaves of absence, including jury duty leave, military leave, leave protected under Paid Family Leave, and time off or leave provided under the Americans with Disabilities Act or similar state laws; and/or
- Time off due to a work-related injury that is covered by workers' compensation.

Each situation of absenteeism or tardiness will be evaluated on a case-by-case basis. However, the Firm will not subject employees to disciplinary action or retaliation for an absence or for tardiness that is legally protected. If the employee believes that their absence or lateness to work is legally protected, the employee should notify their manager of this fact at the time of the absence or tardiness. Employees will not be required to reveal the nature of any underlying medical condition. If an employee believes they have been mistakenly subject to disciplinary action for an

absence or for tardiness that the employee believes is legally protected, the employee should promptly discuss the matter with Human Resources or the CEO.

Absent extraordinary circumstances or a legally protected reason, if employees fail to report for work without notification to their manager in compliance with this policy, and their absence continues for a period of three days, the Firm will consider that the employee has abandoned and voluntarily terminated their employment.

## 3.12 Personal Electronic Devices

Although the Firm permits employees to bring personal electronic devices, including, but not limited to, cell phones, smartphones, and tablets, into the workplace, employees are expected to remember that working time is for work.

Therefore, employees should only engage in personal phone calls and other use of personal electronic devices during non-working time, including meal and rest breaks. Outside of this time, personal phone calls and communications should be kept to a minimum and for emergencies only.

## 3.13 Personal Calls

While employees are at work, they are expected to perform their job duties and responsibilities. Personal calls should be made primarily outside of working time.

The Firm may monitor the frequency and duration of an employee's usage of its telephones.

Abuse of the Firm's telephones and/or may result in discipline, up to and including termination of employment.

## 3.14 Contact with the Media

To ensure that the Firm communicates with the media in a consistent, timely and professional manner about matters related to the Firm, employees should notify the CCO or the Chairman that they have been contacted by the media whenever they are asked to speak on behalf of the Firm so that the Firm knows that a media inquiry has been made. Do not respond to media inquiries on the Firm's behalf without authorization. This rule does not prevent employees from speaking with the media, but they should not attempt to speak on behalf of the Firm unless they have specifically been authorized to do so by an officer of the Firm.

## 3.15 Internal, Client & Public Relations

Our Firm’s reputation is built on excellent service and quality work. Maintaining this reputation requires the active participation of every employee. The opinions and attitudes that clients have toward our firm may be determined by the actions of one employee. It is sometimes easy to take a client for granted, but this runs the risk of losing not only that client, but his or her associates, friends or family who may also be clients or prospective clients. Each employee must be sensitive to the importance of providing courteous treatment in all working relationships. Inappropriate

language is to be avoided. Employees are to use discretion with regards to language, content, tone, volume and offensive gestures while in the office. Employees are expected to always maintain professional decorum while in the office.

## 3.16 Outside Brokerage Accounts

**Securities Accounts**
All employees must advise Brighton Securities of all accounts at "notice registered broker/dealers" (for instance a Futures Commission Merchant or Introducing Broker trading security features), domestic or foreign investment advisers, banks, or other financial institutions maintained in their name or in the name of a member of their immediate family, or over which they have any control or in which they have direct or indirect beneficial interest. Brighton Securities does not as a matter of policy permit any non-registered employee to maintain a securities account with another broker-dealer without express prior written permission of the designated Principal. Registered Representatives are not allowed to maintain a securities account with another broker-dealer under any circumstances. This does not apply to accounts maintained directly with mutual fund sponsors.

**Duplicate Confirmations**
Duplicate confirmations, statements and/or other information related to all non-Brighton Securities account transactions must be sent contemporaneously to the designated Principal.

**Trading**
In transacting business for themselves, all Bright Securities Corp. employees must observe principles of conduct defined in the Supervisor Procedures Manual and elsewhere by the Firm in order to foster professionalism and integrity in the Firm's business.

**Insider Trading**
Employees are prohibited from effective transactions based on knowledge of material, non-public information.

**Approval**
The principal designated to review and approve personal accounts and trading is also required to comply with these procedures. Review and approval of personal accounts and trading are the obligations of the CCO, a member of senior management, or the Firm's Board of Directors. These designated individuals must ensure that the policies described above are enforced and documented and must document and follow up on any violations discovered.

# SECTION 4 - Time Off and Leave of Absence

## 4.1 Time Off & Leaves of Absence

The Firm recognizes that employees benefit from time away from work for a variety of reasons - all of which contribute towards a positive work-life balance for our employees. Therefore, the Firm provides time off, both paid and unpaid, to eligible employees for the following situations:

- Holidays
- Paid Time Off ("PTO")
- Mandatory Paid Sick Leave
- Bereavement Leave
- Military Leave
- Jury and Witness Duty Leave
- Voting Leave
- Blood and Bone Marrow Donor Leave
- Crime Victim Leave
- Emergency Responder Leave
- Office Closure/Severe Weather

In addition to the above, full-time management and administrative employees can take off their birthday as paid leave. In the event an employee's birthday falls on a weekend, the employee may choose to take the time on the Friday before or Monday after their birthday.

## 4.2 Holidays

The Firm offers paid time off for the observance of specific holidays each calendar year. Full-time employees are eligible for holiday pay from their date of hire. Part-time employees are eligible for holiday pay if the holiday falls during their regularly scheduled work hours. Typically, the Firm observes the following paid holidays:

| | | |
|---|---|---|
| New Year's Day | Birthday of Martin Luther King, Jr. | Presidents' Day |
| Good Friday | Memorial Day | Juneteenth |
| Independence Day | Labor Day | Thanksgiving Day |
| Christmas Day | | |

If a holiday falls on a weekend day, the Firm usually observes the holiday on the preceding Friday or the following Monday. Holiday observance will typically be announced in advance.

Holiday pay is counted for the purpose of calculating an employee's overtime hours of work or overtime premiums.

Employees who are on a continuous leave of absence are not eligible to receive holiday pay.

## 4.3 Paid Time Off ("PTO")

The Firm provides paid time off ("PTO") benefits to its regular full-time management and administrative employees. PTO can be used as for vacation time, mandatory paid sick time or to take care of personal matters.

Part-time, seasonal, and temporary employees including interns, Financial Trainees and Advisors are eligible for time off as permitted by New York's mandatory paid sick leave law.

Eligible employees accrue PTO as follows:

| ***Years of Service*** | ***No. of PTO Days*** |
|---|---|
| 0-1 year | 15 |
| 1 year | 16 |
| 2 years | 17 |
| 3 years | 18 |
| 4 years | 19 |
| 5 years | 20 |
| 6 years | 21 |
| 7 years | 22 |
| 8 years | 23 |
| 9 years | 24 |
| 10 years | 25 |

*****Prorated in the year of hire based upon the date of hire

At year end, unused PTO will be forfeited.

Employees should request to schedule PTO time off as far in advance as possible, at a minimum two weeks. PTO will be scheduled to provide adequate coverage of jobs and staff requirements. The Firm will make the final determination in this regard. While PTO is accrued throughout the calendar year, employees are allowed to go "negative" in their PTO balance, but balances will be monitored by management throughout the year.

An employee who is unable to report to work because of injury or illness must notify their manager prior to the scheduled starting time and should refer to **policy 3.10, Attendance and Punctuality** for specific requirements for calling in sick.

PTO pay is not counted for the purpose of calculating an employee's overtime hours of work or overtime premiums. Moreover, PTO does not accrue during unpaid leaves of absence or other periods of inactive service unless required by state or federal law.

## 4.4 Paid Sick Leave

The Firm provides eligible employees with paid sick leave in accordance with the requirements of New York's mandatory sick leave law. All employees (whether full-time, part-time, temporary, seasonal, per diem) working in New York are eligible to accrue/receive paid sick leave. Paid sick leave is incorporated in PTO accruals for employees eligible to receive PTO.

Eligible employees begin to accrue paid sick leave on September 30, 2020 or the employee's date of hire, whichever is later. Eligible employees may begin to use accrued paid sick leave as of January 1, 2021.

Paid sick leave is accrued at a rate of one (1) hour for every 30 hours worked, up to a maximum accrual of 40 hours each leave year. For purposes of this policy the "leave year" is the calendar year from January 1 to December 31.

Only actual hours worked count toward the employee's sick leave accrual. Employees do not accrue sick time for hours not worked including use of sick leave under this policy as well as PTO, flex hours or holidays.

**Use of Paid Sick Leave**
Employees may use accrued leave for the following reasons impacting the employee or a member of their family for whom they are providing care or assistance with care:

**Sick Leave**

- For mental or physical illness, injury, or health condition, regardless of whether it has been diagnosed or requires medical care at the time of the request for leave; or
- For the diagnosis, care, or treatment of a mental or physical illness, injury or health condition; or
- Need for medical diagnosis or preventive care.

**Safe Leave**

- For an absence from work when the employee or employee's family member has been the victim of domestic violence as defined by the State Human Rights Law, a family offense, sexual offense, stalking, or human trafficking due to any of the following as it relates to the domestic violence, family offense, sexual offense, stalking, or human trafficking:

    - to obtain services from a domestic violence shelter, rape crisis center, or other services program.
    - to participate in safety planning, temporarily or permanently relocate, or take other actions to increase the safety of the employee or employee's family members.

- to meet with an attorney or other social services provider to obtain information and advice on and prepare for or participate in any criminal or civil proceeding.
- to file a complaint or domestic incident report with law enforcement.
- to meet with a district attorney's office.
- to enroll children in a new school; or
- to take any other actions necessary to ensure the health or safety of the employee or the employee's family member or to protect those who associate or work with the employee.

An individual is not eligible for safe leave where that individual has committed such domestic violence, family offense, sexual offense, stalking or human trafficking, regardless of any family relationship.

**Definition of Family Member**
For purposes of this policy, the following definitions apply:

- "Family member" means an employee's child, spouse, domestic partner, parent, sibling, grandchild or grandparent, and the child or parent of an employee's spouse or domestic partner.
- "Parent" means a biological, foster, step- or adoptive parent, or a legal guardian of an employee, or a person who stood in loco parentis when the employee was a minor child.
- "Child" shall means a biological, adopted or foster child, a legal ward, or a child of an employee standing in loco parentis.

**Increments of Use**
Paid sick leave may be used in 30-minute increments. Eligible employees may use up to 40 hours of paid sick leave in any leave year.

An employee's sick leave pay is based on the number of hours the employee is regularly scheduled to work at the employee's normal rate of pay or the applicable minimum wage, whichever is greater. Employees who are paid at more than one rate of pay will be paid based on the weighted average of those rates.

The employee may elect to supplement their New York Paid Family Leave (PFL) benefit, state disability benefit or any other job protected leave with paid sick leave in increments of 30 minutes.

The Firm is committed to complying with all applicable laws. Employees should contact the CAO or Human Resources for information about other federal and state medical, victim or family leave rights.

Employees may provide verbal or written request of the need for leave to the CAO or Human Resources.

**Questions Regarding Accrual and Use**
Employees should contact the CAO or Human Resources with any questions regarding records of individual accrual or use of sick leave.

Unused sick leave will be carried over to the next leave year. However, employees may not use more than 40 hours of paid sick leave in a leave year.

The Firm does not offer pay in lieu of taking paid sick leave.

**Confidentiality**
Employees are not required to disclose confidential information relating to a mental or physical illness, injury, or health condition of such employee or such employee's family member, or information relating to absence from work due to domestic violence, a sexual offense, stalking, or human trafficking, as a condition of receiving sick leave.

**Reinstatement**
Employees utilizing paid sick leave will be returned to the same position they held immediately prior to the use of leave with the same pay and other terms and conditions of employment.

**No Retaliation**
Employees have the right to request and use sick leave in a manner consistent with state law. The Firm will not discriminate or retaliate, or tolerate discrimination or retaliation, against any employee who seeks or obtains leave under this policy or who otherwise exercises their rights under this policy. Employees who feel they have been retaliated against for such activity should immediately contact the CAO or Human Resources.

**Misuse of Leave**
An employee who uses leave for purposes other than those provided for under this policy, or who lies in connection with taking such leave, will be subject to disciplinary action, up to and including termination.

**Paid Sick Leave at Separation**
Unused sick leave is not paid upon separation from employment.

## 4.5 Bereavement Leave

Full-time employees may take up to three days of paid bereavement leave to attend the funeral and make any necessary arrangements due to the death of an immediate family member, and two days of paid bereavement leave due to the death of a non-immediate family member, except were allowed additional time off for bereavement under applicable state law.

"Immediate family members" consist of the employee's spouse, domestic partner, children, siblings, parents, grandparents, grandchildren, or the child, sibling or parents of the employee's spouse or domestic partner. "Non-immediate family members" consist of the employee's aunts, uncles, nieces, and nephews.

Employees must notify their manager as soon as possible if they need to take bereavement leave. Approval of bereavement leave will occur in the absence of unusual Firm operating requirements. Any employee may, with the CAO, or the CEO's approval, use any available paid leave for additional time off beyond the number of days noted above as necessary.

Employees who require additional time off as a reasonable accommodation of a religious practice should speak with the CAO or CEO.

## 4.6 Military Leave

Both federal and state law provide employees with the right to take leave in order to serve in the military. At the federal level, military leave rights are governed by the Uniformed Services Employment and Reemployment Rights Act, commonly referred to as "USERRA". This policy discusses military leave under USERRA.

USERRA establishes a baseline for employees' rights with respect to military leaves. States may provide an employee with greater or additional rights with respect to military leaves than those under USERRA. If the employee works in a state that provides rights greater than those provided under USERRA, the Firm will provide those rights. If an employee plans to request leave based on military service, they should contact Human Resources, or the CAO, for information on any additional rights or requirements, if applicable, under state law.

**Eligibility for Leave**
The Firm provides unpaid military leaves of absence to employees who serve in the uniformed services as required by USERRA and applicable state laws. The uniformed services are defined as the Army, Navy, Marine Corps, Air Force, Coast Guard, Army National Guard, Air National Guard, and Commissioned Corps of the Public Health Service and any other category of persons designated by the President of the United States in time of war or national emergency. The uniformed services also include participants in the National Disaster Medical System when activated to provide assistance in response to a public health emergency, to be present for a short period of time when there is a risk of a public health emergency, or when they are participants in authorized training.

Service consists of performing any of the following on a voluntary or involuntary basis: active duty, active duty for training, initial active duty, inactive duty training, full time National Guard duty, absence from work for an examination to determine fitness for such duty, and absence for performing funeral honors duty. Total military leave time may not exceed five years during employment, except in certain, defined circumstances.

**Notice of Leave**
Advance notice of leave is required, preferably in writing, unless giving of notice is impossible or unreasonable, or notice is prohibited by military necessity (which is defined by the United States Department of Defense). When notice is required, employees must provide their manager with as much advance notice as possible of any anticipated leave of absence for military service.

**Compensation and Benefits during Leave**
Accrued, unused paid time off ("PTO") will be paid during military leave at the employee's request. After 30 days of continuous military leave, employees may elect to continue their health plan coverage at their own expense, for up to 24 months or during the remaining period of service, whichever is shorter.

**Reinstatement**
In order to be eligible for reinstatement, an employee must have provided advance notice of the need for military leave (where required) and have completed their service on a basis that is not dishonorable or otherwise prohibited under USERRA.

Employees whose military service will be for fewer than 31 days must report back to work at the beginning of the first full, regularly scheduled workday following completion of service, after allowing for a period of safe travel home and eight hours of rest.

Employees whose military service will be for more than 30 days, but fewer than 181 days must apply for re-employment within 14 days after completing service.

Employees whose service is greater than 180 days must apply for re-employment within 90 days after completing service.

As with other leaves of absence, failure to return to work or to reapply within applicable time limits may result in loss of reemployment rights. Full details regarding reinstatement are available from Human Resources or the CEO.

In general, an employee returning from military leave will be re-employed in the position and seniority level that the employee would have attained had there been no military leave of absence. If necessary, the Firm will provide training to assist the employee in the transition back to the workforce.

PTO does not continue to accrue during a military leave of absence. An employee returning from military leave is entitled to any unused, accrued PTO the employee had at the time the military leave began minus any PTO the employee chose to use during the leave. Upon reinstatement, the employee will begin to accrue PTO at the rate they would have attained if no military leave had been taken.

**New York State Requirements**
Full-time and part-time employees will be granted time off from work for military training or active duty in accordance with New York law. Employees returning from active duty or military training will be reinstated to the same position, or to a position of like seniority, status and pay, unless the Firm's circumstances have changed such that it is impossible or unreasonable to do so. To be eligible for reinstatement, employees must:

- Receive a certificate of completion duly executed by an officer of the applicable force or militia.
- Be qualified to perform their former job duties; and
- Apply for reemployment within 90 days of discharge from duty, except that employee returning from training or school must reapply within 10 days and employees returning from initial full-time training duty or initial active-duty training with or in the United States Armed Forces must apply for reemployment within 60 days of the end of such training.

Any employee who is reinstated to their previous position after training or active duty will not be terminated without cause in the year following reinstatement.

**Military Spouse Leave**
Employees who work an average of 20 or more hours per week, who are the spouse of a member of the United States armed forces, national guard, or reserves who has been deployed during a period of military conflict (to a combat zone of operations or a combat theater) may be allowed up to 10 days of unpaid leave to use when their spouse is on leave. Employees who seek leave under this policy may be required to provide documentation to support their request.

For purposes of this policy, "period of military conflict" means a period of war declared by the United States Congress, or in which a member of a reserve component of the armed forces is ordered to active duty.

The Firm will not retaliate or tolerate retaliation or harassment against employees for requesting or taking military spouse leave.

## 4.7 Jury Duty Leave

The Firm encourages all employees to fulfill their civic responsibilities and to respond to jury service summons or subpoenas, attend court for prospective jury service or serve as a juror. Under no circumstances will employees be terminated, threatened, coerced or penalized because they request or take leave provided, they notify the CAO prior to their service.

Employees must provide their supervisor, Human Resources, or the CAO with notice of any jury summons or subpoena within a reasonable amount of time after receipt and before their appearance is required. Verification from the court clerk of having served may also be required. Employees will be expected to return to work if they are excused from jury duty during their regular working hours.

Employees will receive their regular wages for the first three days of jury duty, provided they would have worked on those days. After three days, employees may use any available PTO hours. Pay will be calculated using the employee's base rate of pay times the number of hours the employee would have regularly worked on the day. Exempt employees will be paid in accordance with the Fair Labor Standards Act ("FLSA").

## 4.8 Voting Leave

Our Firm believes that all employees should have the opportunity to exercise his or her right to vote in elections.

**Time Away from Work**
Employees who do not have sufficient time to vote outside their working hours will be allowed the necessary time off to vote at the beginning or the end of their shift. Up to two hours will be paid time off. No time off will be allowed in any election where the polls are open at least four consecutive hours before or after the employee's shift.

Employees must return to work immediately after voting if their shift has not ended.

**Advance Notice**
Employees intending to take leave to vote must inform their supervisor and/or the CAO not more than ten but at least two working days prior to Election Day. The employee's **supervisor** will designate when the leave should be taken (e.g., at the beginning or end of the shift).

## 4.9 Blood Donor Leave

Employees who work an average of 20 or more hours per week will be granted leave of absence if they seek to donate blood. Eligible employees will be granted up to three hours of leave per calendar year to donate blood off-site or will be provided with an opportunity to donate blood on-site during work hours (such as through a blood drive) at a convenient time and place. Time spent donating blood on-site will be paid. Time spent donating blood off-site will be unpaid for non-exempt employees.

Except in emergencies, employees who seek leave under this policy must give reasonable notice to their manager of at least three working days prior to taking leave for blood donation off-premises and two working days for on-site and other alternative blood donation drives. Employees must also provide documentation to Human Resources immediately after such leave is taken.

The Firm will not retaliate or tolerate retaliation against an employee for requesting or taking blood donor leave.

## 4.10 Bone Marrow Donor Leave

Employees who work an average of 20 or more hours per week will be granted a leave of absence if they seek to undergo a medical procedure to donate bone marrow. The total length of the leave for each employee will be determined by a physician but may not be longer than 24 work hours without Firm approval. An employee who seeks leave under this policy must provide verification from a physician of the purpose and length of the leave. Leave under this policy will be unpaid except that exempt employees will receive pay when required by applicable federal or state law.

The Firm will not retaliate or tolerate retaliation against an employee for requesting or taking bone marrow donor leave.

## 4.11 Crime Victim Leave

Our Firm provides employees with time away from work if they are a victim of a crime or to participate as a witness of a crime.

**Eligibility**
Eligible employees may take time off from work to comply with a subpoena to (1) testify in a criminal proceeding (including time off to consult with the district attorney); (2) give a statement

at a sentencing proceeding; (3) give a victim impact statement at a pre-sentencing proceeding; or (4) give a statement at a parole board hearing.

Employees are eligible for time off under this policy if they are:

- The victim of the crime at issue in the proceedings.
- The victim's next of kin.
- The victim's representative (a person who represents or stands in the place of another person, including an agent, attorney, guardian, conservator, executor, heir or parent of a minor) if the victim is deceased as a result of the offense.
- A good Samaritan (someone who acts in good faith to: (1) apprehend a person who has committed a crime in his or her presence; (2) prevent a crime or an attempted crime from occurring: or (3) aid a law enforcement officer in effecting an arrest); or
- Pursuing an application or the enforcement of an order of protection as provided under relevant law.

**Crime Victim Leave Pay**
If an employee needs crime victim leave, he or she is paid regularly scheduled wages for 3 days. Exempt employees will not incur any reduction in pay for a partial week's absence for leave under this policy.

**Documentation**
Employees must notify their supervisor or the CAO of the need to take a leave under this policy no later than the day before the absence. In addition, employees must provide the CAO with verification of their service upon request.

**Time Away from Work**
In fairness to the Firm, employees are expected to return to work if they are excused from proceedings during their regular working hours.

**No Retaliation**
The Firm will not retaliate or tolerate retaliation against any employee who seeks or obtains leave under this policy.

## 4.12 Emergency Responder Leave

Eligible employees will be allowed time off from work to perform duties as a volunteer firefighter or member of a volunteer ambulance service during a declared state of emergency, unless providing the leave would impose an undue hardship on the Firm's business operations.

To be eligible for leave under this policy, employees must have previously provided the Firm with written documentation from the volunteer fire department or ambulance service notifying the Firm of the employee's status as a volunteer firefighter or volunteer ambulance service member and the employee's volunteer duties must be related to the declared emergency.

Leave under this policy will be unpaid for non-exempt employees, except that employee may elect to use any other applicable paid leave to which they are entitled.

The Firm may request certification of the need for leave in the form of a notarized statement from the head of the fire department or ambulance service setting for the time period that the employee's volunteer services were required.

## 4.13 Office Closing

It is Brighton Securities Corp.'s practice to remain open during regular business hours whenever possible. However, in some unforeseen circumstances, it may be necessary to close the building in order to protect the health and safety of Brighton Securities Corp. employees.

When an inclement weather situation occurs that makes Brighton Securities Corp. close early or for an entire workday(s), Brighton Securities Corp. will announce this closing to the employee's manager, or another member of management.

Unless noted through the above outlets, employees should assume that Brighton Securities Corp. is open and operating at full capacity.

If an employee believes they are not capable of coming to work or must leave early when Brighton Securities Corp. is open, the employee should inform the appropriate manager or Human Resources of this absence and use a paid or unpaid leave day depending on what is available to the employee.

If Brighton Securities Corp. deems it necessary to close early, it is the duty of the employees at work to remain until closing or to follow the standard procedures for taking a partial day off from work. However, Brighton Securities Corp. encourages employees to leave as soon as Brighton Securities Corp. closes in order to expediently and safely arrive at their destination.

## 4.14 Community Partnership Program

We are a local firm, and our commitment to the community extends beyond care for our clients. Because we value our employee's efforts to support and improve our community, Brighton Securities Corp. pays employees while volunteering.

Every regular full time Brighton Securities Corp. employee is eligible to be paid for up to 20 hours of approved volunteer work per year. Advisors will receive comparable credit to their marketing budgets. We encourage employees to work together and form a Brighton Securities Corp. team for volunteer work, in which case employees can earn even more!

As business conditions allow and with management approval, Brighton Securities Corp employees may request to take time out of the office during normal working hours to participate in a volunteer event. Employees will receive credit under the program for four hours and will be requested to supplement the balance of their time out of the office for that occurrence with paid time off

("PTO"). Once per calendar year employees may request to spend a full day, eight hours, volunteering.

All activities must be pre-approved. Examples of appropriate volunteer activities include things like serving at a soup kitchen, building a house, teaching literacy, and cleaning up litter. Activities must be under the direction of an official charitable organization. Excluded activities include board work and sporting events. We encourage employees to wear Brighton Securities Corp. logoed sportswear while volunteering.

Staff and management will have hours paid at their hourly rate, to a maximum of $20.00 per hour. Advisors will be credited at $20.00 per hour. A multiplier of $0.20 per hour per additional Brighton Securities Corp. employee will be credited for group activities. For example, a team of five Brighton Securities Corp employees would equate to an extra $1.00 per hour for each participant.

Questions regarding this policy should be directed towards managers and Human Resources.

# SECTION 5 - Pay Practices

## 5.1 Pay Practices

Brighton Securities is committed to a policy of fair and equitable compensation for all employees.

**Wage and Salary Program**
Wage rates are assigned to each job based on job requirements and the economic conditions of the Firm and the marketplace, as well as each employee's qualifications, skills and abilities. The Firm endeavors to comply with all federal, state and local laws with respect to the payment of wages.

**Merit Increases**
Pay increases may be provided when an employee demonstrates improvement or outstanding performance in his or her job. When reviewing pay increases, the Firm considers business profitability, an employee's individual work performance and other economic factors. All merit increases are provided at the sole discretion of the Firm.

**Payday**
Employees are paid bi-weekly on Fridays. If payday falls on a holiday, employees will ordinarily be paid on the day before the holiday.

**Payroll**
Employees have the option of being compensated by check or direct deposit. The CAO answers questions regarding compensation options.

**Garnishments**
A court may order the Firm to garnish amounts directly from an employee's paycheck. The Firm is required to withhold the amount indicated in the garnishment from the employee's paycheck in accordance with federal, state and local law.

**Overtime**
When operating requirements cannot be met during regular work hours, employees may be scheduled to work overtime hours. When possible, advance notification of these assignments will be provided.

Non-exempt employees will be paid one and one-half times their regular straight-time rate for all hours worked over forty (40) hours in a workweek.

- The Firm's seven-day workweek is from Monday through Sunday.
- Paid time off (PTO) time is not counted as hours worked when calculating overtime.
- Holiday time is counted as hours worked when calculating overtime.
- All overtime work must receive the supervisor's prior authorization.
- Working unauthorized overtime may result in disciplinary action, up to and including termination.

**Outside Work Activities**
Unless pre-approved by their supervisor, non-exempt employees are prohibited from performing work activities during non-working hours. This includes, but is not limited to, accessing electronic communication devices (cell phones, texts, emails) for work-related purposes and performing preparatory work outside of regular work hours. Time spent accessing work-related electronic communication devices outside of regular work hours or performing any other work during non-working hours must be pre-approved by their supervisor. Any such time, regardless of whether it has been approved or not, must be recorded and reported as time worked on the non-exempt employee's timesheet.

**Travel/Expense Reimbursement**
Employees will be reimbursed for pre-authorized expenses, such as: Firm-related travel mileage, hotel expenses, airfare or other business expenses incurred on behalf of Brighton Securities Corp. Employees will be reimbursed for their mileage at the current IRS reimbursement rate. In addition to obtaining pre-approval, the employee must complete a travel/expense reimbursement form, attach any receipts and submit to the supervisor. Abuse of this business expense policy, including falsifying expense reports to reflect costs not incurred by the employee, may result in disciplinary action, up to and including termination of employment.

**Overpayments**
In the event an employee is overpaid due to a mathematical or clerical error, Brighton Securities Corp. will proceed to recoup the overpayment via wage deductions in accordance with the New York State Labor Law. Employees who become aware of an overpayment must notify the CAO immediately. For more information, employees should contact the CAO.

**Policy for Deductions from Wages**
Employee pay stubs itemize deductions made from gross earnings. The Firm is required by law to make deductions for Social Security, federal income tax and any other appropriate taxes. These required deductions may also include any court-ordered garnishments. Pay stubs also itemize any voluntary deductions such as an employee's portion of health, dental, vision, disability and life insurance premiums and/or voluntary contributions to a 401(k), to the extent applicable. If applicable, pay stubs will also differentiate between regular and overtime pay received.

It is our policy to comply with the salary basis requirements of the Fair Labor Standards Act (FLSA) and state law. In turn, supervisors are prohibited from making any improper deductions from the salaries of exempt employees or from the wages of any employee that are not consistent with federal and state wage and hour laws.

## 5.2 Permitted Deductions from Exempt Employee's Pay

Employees who are classified as exempt must record absences from work for reasons such as leave, PTO.

Exempt employees are paid on a salary basis. This means the employee regularly receives a predetermined amount of compensation each pay period, which cannot be reduced because of variations in the quality or quantity of the employee's work. In general, an exempt employee will receive his or her salary for any week in which the employee performs any work, regardless of the number of days or hours worked. However, an exempt employee will not be paid for days not worked in the following circumstances:

- When an exempt employee takes one or more full days off for personal reasons other than sickness or disability, the employee will not be paid for such day(s) of absence, but the employee may use available PTO to make up for the reduction in salary;
- When an exempt employee takes one or more full days off from work due to sickness or disability, the employee will not be paid for such day(s) of absence, but the employee may use available PTO time to make up for the reduction in salary;
- When an exempt employee works only part of the week during his or her first and last week with the Firm, the employee will be paid only for the days actually worked; and
- When an exempt employee takes unpaid leave under applicable federal and NYS laws, the Firm will not pay for such days/hours of absence.

An exempt employee's salary will not be reduced when the employee works part of a week and misses part of the same week due to service as a juror, witness, or in the military or for lack of work.

It is Firm policy to comply with the salary basis requirements of the Fair Labor Standards Act (FLSA) and applicable state law. The Firm prohibits any deductions from pay that violate the FLSA or applicable state law.

**Reporting Improper Deductions or Other Errors**
Employees should immediately contact their supervisor or the CAO with questions about deductions or to report improper deductions and/or errors. Employees will not be retaliated against for making a complaint.

Reports of improper deductions or other errors will be promptly investigated. If it is determined that an improper deduction or other error has occurred, the employee will be promptly reimbursed. It is our policy and practice to accurately compensate employees and to do so in compliance with all applicable state and federal laws. To ensure accurate pay and proper deductions for all time worked, employees must accurately record all work time. Additionally, employees should promptly review their paychecks to identify and report all errors.

**Discussion of Wages**
No employee is prohibited from inquiring about, discussing or disclosing his or her wages or the wages of another employee, if voluntarily disclosed by that employee. Employees are not required to disclose their wages to anyone. This policy does not apply to disclosure of other employees' wage information by employees who have access to such information solely as part of their essential job functions and who, while acting on behalf of the Firm, make unauthorized disclosure of that information. Firm representatives may disclose employees' wages in response to a complaint or charge, or in furtherance of an investigation, proceeding, hearing or action under state law.

**Pay Transparency Policy Statement**
The Firm will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is: (a) in response to a formal complaint or charge; (b) in furtherance of an investigation, proceeding, hearing or action, including an investigation conducted by the employer; or (c) consistent with the employer's legal duty to furnish information.

## 5.3 Working Hours

Our firm observes a 40-hour work week. Time records are kept for each non-exempt employee showing the hours worked each week.

**Workweek**
Due to the nature of our business, workdays and hours may vary with the job. Our standard workweek consists of 8 hours per day, 5 days per week.

**Meal Break**
Employees who work more than six (6) hours in a workday which extend over the noonday meal period (11am-2pm), are required to take a 60-minute meal break during that period. The Firm's noonday meal period is unpaid. A 60-minute meal break is standard, unless otherwise stated for an employee's position and/or department. Supervisors are responsible for the scheduling of meal breaks.

If for any reason an employee's meal break is interrupted, the employee must notify his or her supervisor and the time should be recorded as worked. The employee will be paid for the time and will receive an uninterrupted meal break as soon as practicable. Employees should contact their supervisor if they have any questions regarding the meal break.

**Additional Breaks**
Employees receive two (2) additional 15-minute breaks each day.

**Nursing Mothers' Protection**
Nursing mothers may receive break time each day to express breast milk for up to three years after the birth of a child. Meal periods may also be used for this purpose. A nearby private area or room, which is not a bathroom, will be provided in which the employee may express breast milk. No employee will be penalized or retaliated against for choosing to express breast milk. Employees needing a private area for expressing breast milk should see their supervisor or the CAO for more details.

**Time Records**
Non-exempt employees are responsible for recording their hours worked on the Firm's timesheet, signing it and then submitting it to the CAO for approval. Both non-exempt and

exempt employees are expected to record their absences on the Firm's Out of Office Calendar. To ensure accurate record keeping of hours worked, non-exempt employees are required to enter their time into the timesheet as close as possible to the beginning or end of their actual working time.

**Absence Reports**
Exempt and non-exempt employees are responsible for recording any time away from work on the Firm's Out of Office Calendar. The CAO will approve any non-exempt time away requests.

**Mandatory Time Off/Day of Rest**
Brighton Securities will provide employees with at least 24 consecutive hours of rest in any calendar week.

# SECTION 6 - Employee Benefits

## 6.1 Benefits Overview

Benefit plans offered by Brighton Securities Corp. are defined in legal documents such as insurance contracts and summary plan descriptions. If employees are offered benefits, and if a question arises about the nature and extent of plan benefits or if there is a conflict in language, the formal language of the plan documents govern, not the informal wording of this Employee Handbook. Plan documents, if applicable, are available for employees' inspection. The Firm and its designated benefit plan administrators reserve the right to determine eligibility, interpretation and administration of issues related to benefits offered by the Firm.

Employment benefits vary according to the position and status of the employee.

Full-time employees are eligible to receive employment benefits offered by Brighton Securities Corp. Part-time and seasonal employees are eligible to receive all employment benefits required by law. To receive certain benefits, eligible employees may be required to meet participation requirements and pay required premiums and other contributions.

Employees should contact Human Resources or the CAO for detailed benefits information.

## 6.2 Medical, Dental, & Vision Insurance

The Firm currently offers medical, dental, and vision insurance to eligible employees and their spouses, dependents, and other qualifying family members in an equitable and cost-effective way and in compliance with applicable federal and state laws.

Once a plan selection is made it will remain fixed for the remainder of the plan year; however, employees will have an opportunity to make changes to their benefit selections during the Firm's annual open enrollment period.

Employees who experience a qualifying life event such as marriage, divorce, or the birth of a child will also be allowed to make a change in their benefit selection when that event occurs, in accordance with the terms of the plan document.

Both the Firm and the employee may contribute to the cost of medical, dental, and vision insurance. Employees should contact Human Resources or the CAO with any questions.

## 6.3 Health Savings Accounts

Eligible employees may participate in Health Savings Accounts (“HSAs”). HSAs allow employees to use pre-tax dollars to pay for eligible health care-related expenses.

HSAs have strict rules relative to contribution amounts, how funds are reimbursed and funds remaining in the account. Employees should contact Human Resources if they have any questions regarding HSAs.

## 6.4 Voluntary Life Insurance

All full-time, eligible employees have the option to purchase life insurance through the Firm's Voluntary Life Insurance plan. Coverage is available for the employee, spouse and/or dependent child(ren) at time of hire or during the Firm's annual open enrollment period. Spousal and/or child(ren) coverage is only available if the employee has elected this coverage.

The premium for this coverage is fully paid by the employee. Employees should contact Human Resources with any questions.

## 6.5 Pre-Tax Premium Plan

Employees of Brighton Securities Corp. may participate in our pre-tax premium plan. The advantage of a pre-tax premium plan is that it allows employees to pay for certain insurance benefits on a pre-tax basis.

**Eligibility**
All employees who enroll in the medical, dental and vision plans are eligible to join our pre-tax premium plan.

**Benefits**
Our pre-tax premium plan allows employees to save taxes on the money they pay toward medical, dental and vision plans. Under this plan employee premiums are deducted from gross pay before taxes are deducted. By reducing gross wages, employees pay fewer taxes on the money that they earn.

**Enrollment**
Eligible employees who enroll in our medical, dental or vision plans will automatically be enrolled in the pre-tax premium plan but may opt out of the pre-tax premium plan by contacting the CAO.

**Changes in Benefit Elections**
Generally, after signing the pre-tax premium plan enrollment form, employees may not change their benefit plans until the beginning of the next plan year. An eligible employee may make a mid-year election change, however, upon the occurrence of certain qualifying events, provided the change is made on account of and consistent with, such event. The qualifying events for a mid-year election change can include:

- Certain significant changes in health plan coverage or costs.
- Certain changes in family status; or
- Certain changes in the employment status of the employee or his or her spouse.

A complete list of the qualifying events for a mid-year election change can be found in the Summary Plan Description.

## 6.6 Retirement Benefits 401(k)

Brighton Securities provides access to retirement benefits to eligible employees through a 401(k) Plan. Additionally, participating employees are eligible to receive a 2% employer match. Employer match funds are deposited into an employee's account every pay period that an employee is actively participating in the Plan.

Employees are always 100 percent vested in the full amount of their contributions. Employer match contributions are subject to a vesting schedule as outlined in the Summary Plan Description.

In the event of any conflict in the description of any plan, the official plan documents, which are available for your review, shall govern. Employees wanting detailed information on the retirement benefits that may apply to them should contact Human Resources or the CAO.

## 6.7 Profit-sharing Plan

Every employee of Brighton Securities has an impact on our profitability. To recognize and reward your efforts, we maintain a Profit-sharing Plan for eligible employees. The firm has contributed to the plan every year since it was established in 1980. The amount of the firm's contribution to the plan is based each year on the firm's profits. Your eligibility to receive the share of the firm's contribution is based on your earnings in proportion to the total earnings of all participants.

You can obtain a copy of the Summary Plan Description which contains the details of the plan including eligibility and benefit provisions from Human Resources. In the event of any conflict in the description of any plan, the official plan documents, which are available for your review, shall govern. If you have any questions regarding this plan, see your supervisor or the Chairman.

## 6.8 Disability Benefits

Short-Term Disability ("DBL") and Long-Term Disability ("LTD") benefits are available to eligible employees.

**Short-Term Disability Benefits**
DBL benefits provide partial income protection for employees who are unable to work due to medical reasons for up to 26 weeks in a calendar year. DBL includes loss of work due to hospitalization, outpatient surgery, illness or injury not related to work.

Employees out on DBL are required to submit documentation from a doctor or licensed health care professional authorizing the employee to return to work.

DBL benefits will be used concurrently with all federal or state required leaves of absence. Subject to applicable federal and state laws, the Firm reserves the right in its sole discretion to require employees on Short-Term Disability Leave to use accrued paid time off ("PTO") during any

waiting period (i.e., days before DBL benefits start) and for any unpaid family and medical leave where the employee does not receive DBL pay.

Full-time, eligible employees have the option to purchase Voluntary Short-Term Disability insurance.

Employees should contact Human Resources with any questions.

**Long-Term Disability**
Full-time employees may also be eligible for basic LTD coverage. An eligible employee who is out on a non-work-related disability for more than 26 weeks may apply for long term disability benefits.

Full-time, eligible employees have the option to purchase Voluntary Long-Term Disability insurance.

Employees should contact Human Resources with any questions.

## 6.9 Workers' Compensation

When work-related accidents, injuries or illnesses occur, employees may be eligible for workers' compensation insurance benefits. The Firm provides a comprehensive workers' compensation insurance program at no cost to employees and in accordance with applicable state law. This program covers most injuries or illnesses, sustained in the course of employment, that require medical, surgical or hospital treatment. Subject to applicable legal requirements, workers' compensation insurance provides benefits or, if the employee is hospitalized, treatment immediately.

**Reporting Work-Related Injury or Illness**
Employees who sustain a work-related injury or illness should inform Human Resources 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.

**Leaves of Absence/Accommodation**
Employees who need to take time off from work due to a workers' compensation illness or injury may also be eligible for a leave of absence under the Firm's leaves of absence or reasonable accommodation policies. Employees should consult with Human Resources for additional information.

**Return to Work**
Employees who are ready to return to work following a workers' compensation-related leave of absence must supply a certification from a health care provider confirming the employee's ability to return to work.

**Fraud**
The Firm will notify the workers' compensation insurance Firm if we have reason to believe an employee has supplied false or misleading information in connection with a claim and/or has filed a fraudulent claim. Workers' compensation fraud is a crime and may also be grounds for disciplinary action, up to and including termination of employment.

## 6.10 New York Paid Family Leave Benefits

New York's Paid Family Leave (PFL) law provides job protected leave and wage replacement to eligible employees for qualifying events.

**Eligibility**

To be eligible, employees must: regularly work 20 or more hours per week and be employed for at least 26 consecutive workweeks preceding the first full day family leave is taken; or regularly work less than 20 hours per week and be employed for at least 175 days preceding the first full day family leave is taken. Paid time off can be counted toward an employee's eligibility determination. Employees are eligible for PFL regardless of citizenship and/or immigration status.

PFL is granted to eligible employees who request time off for the following qualifying events:

- To participate in providing care, including physical or psychological care, for an employee's spouse, child, stepchild, parent, parent-in-law, stepparent, grandchild, grandparent, or domestic partner with a serious health condition.
- To bond with a child during the first 12 months after the child's birth, adoption or foster care placement with the employee, the employee's spouse, or the employee's domestic partner; or
- Due to a qualifying exigency for the employee's spouse, domestic partner, child, or parent who is on active military duty or has been notified of an impending call to active duty.

A serious health condition is an illness, injury, impairment, or physical or mental condition that involves: (a) inpatient care in a hospital, hospice or residential health care facility; or (b) continuing treatment or continuing supervision by a health care provider.

**Length of Leave and Benefits**

For leaves beginning on or after January 1, 2021, eligible employees may receive to up to 12 weeks of job protected, paid time off for a PFL-qualifying reason. In 2021, employees taking PFL will receive 67% of their average weekly wage, or 67% percent of the state average weekly wage, whichever is less.

Employees who take PFL in weekly increments are eligible for the maximum number of weeks of leave, as indicated in the above chart, using a 52-week rolling look back period.

Employees who take PFL in daily increments (intermittent leave) are eligible for paid leave based on the average number of days worked per week during a base period.

**Intermittent Use**

Eligible employees may take leave under the PFL on an intermittent basis, in full-day increments. Employees may not take partial-day leave under PFL.

When an employee takes intermittent PFL, the employee must provide notice to the Human Resources, or the CAO as soon as is practicable before each day of intermittent leave.

**Multiple Employees Requestion Leave**

More than one employee of Brighton Securities Corp. cannot use the same period of PFL to bond with the same child or to care for the same qualifying family member.

**Employee Notice Requirements**

In the case of a foreseeable leave, a covered employee must provide Human Resources or the CAO with advance notice 30 days before the date on which the leave would begin. If the employee is unable to provide 30 days' notice, he or she must provide notice as soon as it is practicable under the circumstances. Usually, this means giving notice the same day the employee receives notice or the next business day. If an employee does not give Human Resources or the CAO timely notice, the employee's PFL leave may be delayed or denied.

In giving notice, an employee must provide sufficient information for the Firm's PFL insurance carrier, Shelter Point, to determine if the leave qualifies for PFL and the anticipated timing and duration of the leave.

**Procedure for Requesting Leave**

Employees must complete and submit a Request for Paid Family Leave Form (PFL-1) with supporting documentation as follows to Shelter Point:

1. Bonding Certification: PFL-2 Form plus documentation.
2. Health Care Provider Certification: PFL-4 Form plus Personal Health Information (PHI) Release (PFL-3 Form); or
3. Military Qualifying Event: PFL-5 Form plus documentation.

The Forms can be obtained from Human Resources or directly from Shelter Point.

To submit a request for PFL, employees must:

- Complete the employee's portion of the PFL-1 Form.
- Submit the PFL-1 Form to Human Resources or the CAO.
- The Firm will complete its portion of the PFL-1 Form and return it to the employee within 3 business days.
- If the Firm fails to respond, employees may submit all materials directly to Shelter Point.

- Depending on the type of PFL leave the employee is seeking, the employee will be required to complete additional PFL forms as described in the letter from Shelter Point. Employees must submit the completed PFL forms to Shelter Point before or within 30 days after the start of their leave. The Firm's PFL insurance carrier must pay or deny leave requests within 18 calendar days of receiving an employee's completed forms.

**Continuation of Benefits During Leave**

Employees are entitled to continue group health benefits under the same terms and conditions as if they were on the job during PFL. Employees are required to pay their portion of the premium by the 15th of each month. The Firm's obligation to maintain health insurance coverage ceases if an employee's premium payment is more than 30 days late. If the health care premium is overdue, the Firm will notify the employee in writing at least 15 days before coverage is to cease, advising that coverage will be dropped on a specified date at least 15 days after the date of the letter unless payment has been received by that date.

If group health plan benefits lapse because an employee has not made the required premium payments, then upon the employee's return from PFL, the employee will be restored to coverage/benefits equivalent to those the employee would have had if paid family leave had not been taken and premium payment(s) had not been missed, including family or dependent coverage.

If an employee chooses not to retain group health plan coverage during PFL, then upon the employee's return from leave, the employee shall be reinstated into the health plan on the same terms the employee had prior to taking leave.

An employee's use of PFL leave will not result in the loss of any employment benefits that accrued prior to the start of an employee's PFL leave (unless such accrued benefits, such as paid time off, were used during PFL leave). The employee, however, will not accrue any additional benefits or seniority during any period of PFL leave that is not paid through use of accrued leave benefits, unless otherwise required by law.

All other employee-paid benefits will be retained as long as the employee continues to make premium payments.

**Concurrence with Other Leaves/Benefits**

Employees may choose to supplement PFL benefits with applicable PTO to receive full salary.

Employees should refer to applicable paid time off policies for information regarding minimum increments applicable to such leave.

**Short Term Disability**

Employees cannot use PFL and short-term disability benefits at the same time, but can use them consecutively, up to a maximum of 26 weeks of disability and PFL benefits combined in a

rolling 52-week period. If an employee is unable to work and qualifies for workers' compensation benefits, the employee may not use PFL benefits at the same time the employee is receiving workers' compensation benefits. An employee receiving reduced earnings may be eligible for PFL.

**Cost**

PFL premiums are paid for by the employee and are deducted from the employee's paycheck on an after-tax basis. The deduction amount is set annually by the Department of Financial Services.

**Waiver Option**

Employees have the option of filing a waiver for PFL benefits if:

- The employee's regular employment schedule is 20 hours or more per week, however the employee will not work 26 consecutive weeks: or

- The employee's regular employment schedule is less than 20 hours per week and the employee will not work 175 days in a 52-consecutive-week period.

Employees who are eligible to waive PFL benefits and wish to do so must complete and submit a waiver form to Human Resources. Employees who submit a waiver form will not make any contributions for PFL benefits and will not be eligible to receive PFL benefits. If the employee voluntarily revokes the waiver or the schedule of an employee changes such that it is anticipated that the employee will become eligible to receive PFL benefits, the waiver will be revoked, and the employee must start making contributions on a going forward basis and must pay retroactive contributions to the employee's date of hire.

**Periodic Status Reports and Return from Leave**

The Firm may require an employee on PFL leave to report periodically on the employee's status and intent to return to work to the extent permitted by law.

Any employee who exercises his or her right to PFL will receive job protection. This means that upon the expiration of that leave, the employee will be entitled to return to the same position the employee held when leave began, or to an equivalent position with equivalent pay and other terms and conditions of employment.

**Questions and Additional Information**

Employees who have questions regarding this PFL policy should contact Human Resources or the CAO. For additional information concerning leave entitlements and obligations that might arise when PFL is either not available or exhausted, employees should consult the Firm's other leave policies or contact Human Resources or the CAO. The Firm is committed to complying with PFL and shall interpret and apply this policy in a manner consistent with the PFL regulations. Employees who disagree with a denial of their claim for PFL may submit their

dispute to arbitration. Employees will be provided with information about how to request arbitration with their PFL denial.

Employees are protected from discrimination and retaliation for requesting or taking PFL. If an employee believes their rights have been violated and/or job restoration has been denied as a result of requesting and/or taking PFL, the employee must send Human Resources or the CAO a formal request for job reinstatement using the Formal Request for Reinstatement Regarding Paid Family Leave (Form PFL-DC-19) which can be found in the forms section of https://www.ny.gov/PaidFamilyLeave.

Employees must file the completed form with the Firm and send a copy to:
Paid Family Leave, P.O. Box 9030, Endicott, NY 13761-9030.

If the Firm does not comply with an employee's request for reinstatement within 30 days, the employee may file a PFL discrimination complaint with the Workers' Compensation Board using the Paid Family Leave Discrimination Complaint (Form PFL-DC-120), which is also available on the New York Paid Family Leave website. Once an employee's complaint is received, the Board will assemble the employee's case and schedule a preliminary hearing in front of a Workers' Compensation Law Judge.

## 6.11 Employee Referral Program

The Firm regularly seeks exceptional professionals to join our team. We believe that our employees are among the best sources of new talent, and we encourage employees to refer qualified applicants for open positions. When these referrals are successful, the Firm will reward the employee who made the recommendation for the new hire.

**Practice**
Vacant positions for which the Firm is conducting a search will be communicated to all employees. Each job posting will include a position description and a list of key qualifications.

Employees are encouraged to review new job postings to determine whether they know of any suitable candidates. Employees who wish to refer a qualified applicant for a posted position are asked to forward the candidate's resume to the CEO or the CAO. Referred resumes should clearly indicate the name of the referring employee.

**Referral Bonus Payment**s
Bonuses paid for the referral of successful job candidates are subject to the following:

- A referring employee who resigns or is terminated from the Firm prior to the bonus payment date is not eligible to receive a referral bonus.
- Employee referral bonuses are paid through payroll and are taxable.

*Staff Bonus*
Employees who refer a qualified staff candidate who is subsequently hired and remains employed for at least six months are eligible for a referral bonus payment of $500.00.

*Advisor -Trainee Bonus*
Employees who refer qualified trainee candidate who is subsequently hired are eligible for a referral bonus payment of $500.00, when the candidate passes the Series 7 exam.

*Advisor – Experienced Bonus*
Employees who refer qualified experienced advisor candidate who is subsequently hired are eligible for a referral bonus of five percent of verifiable trailing 12 months of revenue, to be paid 90 days after date of hire, and five percent of the first 12 months of revenue, to be paid at the end of that year.

# SECTION 7 - Safety and Security

## 7.1 Workplace Safety

The guiding principles of Brighton Securities Corp. and the management of the Firm are to provide a safe and healthful working environment for all employees and to comply with all applicable safety laws and regulations. Maintaining a safe and healthful workplace will help protect the safety and well-being of our employees and the surrounding community and the environment. It is for these purposes that Brighton Securities Corp. has developed this policy.

**Overall Goals of the Safe Workplace Policy and Program**

At Brighton Securities Corp., the safety and health of our employees is this organization's top priority. To accomplish this, the Firm will prohibit employees from performing work or duties deemed unsafe. Compliance with all applicable Occupational Safety and Health Administration regulations is required by all employees.

A goal of the Firm is to maintain occupational safety and health standards that equal or exceed the best practices in the industry.

Brighton Securities Corp. is committed to identifying hazards and unsafe work practices, removing obstacles to accident prevention and helping evaluate Brighton Securities Corp.'s effort to achieve an injury and accident-free workplace.

**Goals for Safety Within the Firm Include**

- Attain a working environment with zero accidents and injuries.
- Provide any necessary physical or mechanical safeguards to prevent or eliminate hazardous conditions.
- Where hazards cannot be eliminated or prevented, adequately equip employees to perform the tasks safely.
- Monitor all compliance regularly, including changes in laws that may affect safety concerns.
- Evaluate new equipment or changes in processes that may impact employees' safety prior to exposure to hazards.
- Conduct routine safety and health audits to discover and eliminate any unsafe working conditions or health hazards.
- Train all employees prior to job assignment and regularly thereafter (as required by the regulations) in appropriate safe work practices and procedures.
- Provide all necessary personal protective equipment to employees free of cost and instruct employees on proper use.
- Maintain a disciplinary system for enforcing safety and health regulations.
- Require employees and managers to follow workplace safety rules as a condition of employment.
- Vigorously investigate all accidents, injuries and incidents in a timely manner. Brighton Securities Corp. strives to immediately investigate and apply corrective measures of all

unsafe conditions within 24 hours of the occurrence. Cause and prevention of similar incidents will be focused on during the investigation.

- Respond to and correct all unsafe conditions reported by employees or managers in a timely manner.
- Follow up all corrective measures with a dedicated evaluation of the methods taken to eliminate the unsafe condition.
- Use at least two different systems for employees to report hazards or unsafe conditions, one of which is completely confidential.
- Maintain all equipment as needed to ensure safe operations.
- Establish good housekeeping throughout the Firm to prevent accidents and injuries.
- Never retaliate against any employee for voicing a concern about unsafe conditions, but rather encourage all employees to report problems or unsafe practices.

**Responsibilities**

The foundation of Brighton Securities Corp.'s Safety Program rests in seven critical elements identified by OSHA:

- Management leadership.
- Hazard anticipation and detection.
- Hazard prevention and control.
- Planning and evaluation.
- Administration and supervision.
- Safety and health training; and
- Employee participation.

Under this foundation, all managers and employees have a shared responsibility for a safe and healthful working environment.

Management is accountable for injury and illness prevention, which includes providing information and educating employees about hazards. Regular reviews of the safety and health program are performed by management. Employee concerns and safety suggestions will be followed up by management.

Management employees are responsible for monitoring employees and offering on-site training for any job duties that require hands on instruction. Managers are required to enforce safety rules and Brighton Securities Corp.'s code of conduct. If employees have safety concerns, the manager will work to investigate and correct these issues.

Employees must participate in safety-program training and activities and follow the instruction of these trainings when working. Additionally, employees should report hazards and unsafe practices to management.

All employees required to wear personal protective equipment must do so as a condition of employment.

Workplace safety is a right and responsibility. Through this policy, all employees are aware of the right to a safe workplace and understand their involvement in keeping the workplace safe.

At Brighton Securities, the most important element of business is the safety of our employees.

## 7.2 Workplace Violence Prevention

The safety and security of employees is of vital importance to Brighton Securities. Therefore, the Firm has adopted a zero-tolerance policy concerning workplace violence. Threats or acts of violence - including intimidation, bullying, physical or mental abuse and/or coercion - that involve or affect Firm employees or that occur on the Firm's premises, will not be tolerated.

The prohibition against threats and acts of violence applies to all persons involved in the operation of the Firm, including, but not limited to, Firm employees and other personnel, contract and temporary workers, consultants, contractors, clients, vendors, visitors and anyone else on the Firm's premises.

Violations of this policy by an employee will result in disciplinary action, up to and including termination from employment.

It is our goal to have a workplace free from acts or threats of violence and to respond effectively if such acts or threats of violence do occur.

Workplace violence is any intentional conduct that is sufficiently severe, abusive, or intimidating to cause an individual to reasonably fear for their personal safety or the safety of their family, friends and/or property such that employment conditions are altered or a hostile, abusive, or intimidating work environment is created for one or several employees.

Examples of workplace violence include, but are not limited to:

- Threats or acts of violence occurring on Firm premises, regardless of the relationship between the parties involved in the incident.
- Threats or acts of violence occurring off Firm premises involving someone who is acting in the capacity of a representative of the Firm, regardless of the relationship between the parties involved in the incident.
- Threats or acts of violence occurring off Firm premises involving an employee if the threats or acts affect the business interests of the Firm.
- All threats or acts of violence occurring off Firm premises, of which an employee is a victim, if we determine that the incident may lead or be connected to an incident of violence, bullying or harassment on Firm premises; and
- Threats or acts of violence resulting in the criminal conviction of an employee or agent of the Firm, or an individual performing services for the Firm on a contract or temporary basis, under any criminal code provision relating to violence or threats of violence when that act or the conviction adversely affect the legitimate business interests of the Firm.

Examples of conduct that may be considered threats or acts of violence under this policy include, but are not limited to:

- Threatening physical contact directed toward another individual. Such threatened conduct may be verbal or by way of gestures or body language or other conduct that a reasonable person would find threatening.
- Threatening an individual or their family, friends, associates, or property with harm.
- The intentional destruction or threat of destruction of Brighton Securities Corp property or another individual's property.
- Menacing or threatening phone calls.
- Stalking.
- Veiled threats of physical harm or similar intimidation; and/or
- Communicating an endorsement of the inappropriate use of firearms or weapons.

Workplace violence does not refer to workplace arguments or debates that are zealous or impassioned, provided there is no resort to any form of coercion. Discussions about sporting activities, popular entertainment, or current events are not considered workplace violence when there is no threat of violence being directed to the workplace or any individual connected with it. Rather, workplace violence refers to behavior that demonstrates an intention to engage in violence or condones violence in our workplace or targets any individual with acts or threats of violence.

Employees should help maintain a violence-free workplace. To that end, employees are encouraged to immediately report any incident that violates this policy to their manager, Human Resources, or the CEO.

Any employee who finds him or herself in a situation in which they are threatened with violence is expected, whenever circumstances allow it, to disengage and retreat to a place of safety, and, if necessary and possible, call the police. Employees should not, except under the most emergent circumstances attempt to subdue another person, whether an employee or a client, when it is possible to retreat and avoid danger to oneself and one’s co-workers. Where employees do not do so, the Firm will evaluate the situation to determine if disengagement and retreat was possible and take appropriate follow-up action.

As noted throughout this Employee Handbook, the Firm provides equal employment opportunities to employees and applicants to individuals in a variety of categories protected by federal and state law, including, but not limited to victims of domestic violence. The Firm will take all reasonable measures within its control to ensure that no employee is harassed, discriminated against, or retaliated against due to their status as a domestic violence victim.

Any employee who feels that by reason of a relationship involving domestic violence that they may not be safe while at work should immediately contact their manager to discuss appropriate measures to ensure their safety and that of their co-workers.

Any employee who believes that a co-worker may be in a relationship that involves domestic violence, and particularly if they become aware of circumstances that may place the co-worker or any other Brighton Securities Corp employees in danger should notify their manager, or a member of the management team immediately.

**No provision of this policy statement or any other provision in this policy alters the at-will nature of employment with Brighton Securities. We will make the sole determination of whether and to what extent, threats or acts of violence will be acted upon by the Firm. In making this determination we may undertake a case-by-case analysis in order to ascertain whether there is a reasonable basis to believe that workplace violence has occurred.**

## 7.3 Weapons in the Workplace

The Firm strictly prohibits employees, or any other person providing services to the Firm or located on the Firm's premises, from possessing weapons of any kind at the workplace, unless approved by Human Resources, the CAO, or the CEO, and for Firm-sponsored events. The workplace includes any property owned or leased by the Firm or occupied by groups of Firm employees or persons providing services to the Firm. Unless this prohibition is contrary to local or state law, the workplace specifically includes Firm parking areas and Firm vehicles. Employees are not permitted to transport or store weapons in vehicles owned or leased by the Firm and used by the employee for work purposes, unless the employee is required to transport or store a weapon as part of the employee's duties, and they have written permission from Human Resources or the CEO**.**

This prohibition specifically includes guns, rifles and firearms of any type, including those for which the holder has a legal permit. Other examples of prohibited weapons include, but are not limited to, knives, ammunition, bombs, bows and arrows, clubs, slingshots, blackjacks, metal knuckles and similar devices that by their design or intended use can inflict serious bodily injury or lethal force.

## 7.4 Workplace Bullying

The purpose of this policy is to communicate to all employees, supervisors/managers, that Brighton Securities will not tolerate bullying behavior in the workplace.

**Definition**
Brighton Securities defines bullying as unwanted behavior of a non-sexual nature that has the purpose or effect of threatening, intimidating, or demeaning another employee. The behavior is repeated over a period and involves a real or perceived power imbalance. Such behavior violates this policy, as well as Brighton Securities' Code of Ethics, which clearly states that all employees will be treated with dignity and respect.

**Examples**
Bullying may be intentional or unintentional. It is the effect of the behavior on the individual that is of the utmost importance. Brighton Securities Corp considers the following types of behavior examples of bullying:

**Verbal Bullying** – slandering, ridiculing or maligning a person or his or her family; persistent name calling that is hurtful, insulting or humiliating; using a person as the butt of jokes; abusive and offensive remarks.

**Physical Bullying** - pushing, shoving, kicking, poking, tripping, assault or threat of physical assault, damage to a person's work area or property.

**Gesture Bullying** - nonverbal threatening gestures; glances that can convey threatening messages.

**Exclusion** - Socially or physically excluding or disregarding a person in work-related activities.

**Electronic Bullying** - threatening, intimidating or offensive text messages, social media posts, etc.

The examples are not intended to be an exclusive list of the types of behavior that would be considered bullying.

**Additional Information**
Employees who feel they have been bullied should contact their supervisor/manager or the CEO, CAO or Human Resources. Reports of bullying will be investigated. Employees found in violation of this policy will be subject to disciplinary action, up to and including termination.

**Anti-Retaliation**
The Firm strictly prohibits retaliation against an employee for making a good faith claim of bullying or for participating in good faith in an investigation of bullying.

## 7.5 Smoke-Free Workplace

The Firm provides a work environment that is smoke-free. Smoking is strictly prohibited inside the building. Employees that observe other individuals smoking in the workplace have a right to object and should report the violation to their manager or to another member of management. Employees will not be disciplined or retaliated against for reporting smoking that violates this policy.

Employees that violate this policy or who tamper with No Smoking signs may be subject to disciplinary action, up to and including termination.

## 7.6 Drug-Free Workplace

The Firm strives to provide a safe environment for employees and others and to minimize the risk of accidents and injuries. Accordingly, each employee has a responsibility to co-workers and the public to deliver services in a safe and conscientious manner. Continuing research and practical experience have proven that even limited quantities of illegal drugs, abused prescription drugs, or alcohol can impair reflexes and judgment. This impairment, even when not readily apparent, can have catastrophic consequences. Moreover, studies have shown that impairment by controlled

substances may last long after the user believes the effects to have worn off. For these reasons, the Firm has adopted a policy that all employees must report to work and remain completely free of illegal drug and abused or non-prescribed prescription drugs. Alcohol may be permitted during Firm-sponsored events.

**Drug Use/Distribution/Possession/Impairment**
The Firm strictly prohibits the use, sale, attempted sale, conveyance, distribution, manufacture, purchase, attempted purchase, possession, cultivation and/or transfer of illegal drugs or other unlawful intoxicants at any time, and in any amount or any manner, regardless of occasion. "Illegal drugs" means all drugs whose use or possession is regulated or prohibited by federal, local, or law. These include prescription medication that is used in a manner inconsistent with the prescription or for which the individual does not have a valid prescription. The Firm treats medical marijuana the same as any other illegal drug. Unless required by state law, the Firm will not accommodate the use of medical marijuana.

Employees are also prohibited from having any such illegal or unauthorized controlled substances in their system while at work.

Included within this prohibition are lawful controlled substances that have been illegally or improperly obtained.

**Alcohol Use/Distribution/Possession/Impairment**
All employees are prohibited from distributing, dispensing, possessing or using any beverage or medicine containing alcohol while at work or on duty and from coming onto Firm premises, reporting to work, or working with alcohol in their systems, except as permitted by Firm-sponsored events. Furthermore, lawful off-duty alcohol use, while generally not prohibited by this policy, must not interfere with an employee's job performance.

**Prescription and Over-the-Counter Drugs**
This policy does not prohibit the possession and proper use of lawfully prescribed or over-the-counter drugs. However, an employee taking medication should consult with a health care professional or review dosing directions for information about the medication's effect on the employee's ability to work safely, and promptly disclose any work restrictions to Human Resources or the CEO. Employees are not required to reveal the name of the medication or the underlying medical condition.

The Firm reserves the right to transfer, reassign, place on leave of absence, or take other appropriate action regarding any employee during the time the employee uses medication that may affect their ability to perform safely. The Firm will comply with all requirements pertaining to providing reasonable accommodations to the extent required by applicable law.

**Counseling and Rehabilitation**
Employees who voluntarily seek help for substance abuse (self-referral) by contacting the Firm will be provided an opportunity to pursue counseling and rehabilitation. The Firm will make available to employees' information about counseling and rehabilitation services. An employee who is receiving counseling and/or treatment for substance abuse may use available paid time off

("PTO"). Health insurance often covers the costs of such services, but costs not covered must be paid by the employee. The employee cannot return to work until released by a treatment provider to do so, and when they receive a negative result on a return-to-work drug and/or alcohol test (as appropriate for that individual). In addition, the employee may be asked to submit to follow-up testing for a period following the return to work.

An employee's decision to seek help voluntarily will not be used as a basis for disciplinary action, although the individual may be transferred, given work restrictions or placed on leave, as appropriate. A request for help is considered voluntary only if it is made before the employee is asked to submit to any drug or alcohol test or is discovered to have otherwise violated this policy.

## 7.7 Infectious Disease

During a period of an infectious disease outbreak or pandemic, Brighton Securities will work to maintain essential functions and services while implementing measures to minimize exposure in the workplace. This policy is designed to meet the requirements of New York State's HERO Act.

**Plan Implementation**

The COO and CAO will oversee the implementation of this policy and coordinate communications from management to employees and other stakeholders.

**SAFETY AND HEALTH MEASURES**

The Firm will implement disease mitigation and protective measures for employees working onsite and offsite and for interactions with clients, vendors and the public during the outbreak or pandemic.

Mitigation and protective measures are outlined in the Airborne Infectious Disease Exposure Prevention Plan. The Plan can be found in the lunchroom, or a copy can be obtained from the CAO, COO or HR. This Plan will be reviewed and revised to ensure the measures of the Plan match the most current information available from local and state health agencies and/or the CDC.

**Health Monitoring**

All employees should self-monitor for symptoms and should notify the CAO or their supervisor when they are ill or experience infectious disease symptoms.

**Stay Home When Sick**

Employees should not report to work when they are feeling ill or are experiencing symptoms of an infectious disease. An employee who appears to exhibit infectious disease symptoms upon arrival at work or who becomes sick during their time at work will be separated from others and sent home.

If an employee is confirmed to have contracted an infectious disease, the Firm will inform other employees of their possible exposure in the workplace, but the confidentiality of the infected

employee will be maintained as required by federal or state law. The employee's co-workers will be instructed to self-monitor for symptoms and be provided with guidelines for doing so.

**Exposure Risk Assessment**
Specific measures to minimize the spread of infection at each work location may be based on the risk level of exposure to employees. The Firm may install protective devices or adopt other interventions to prevent or mitigate exposure to an infectious disease when and where feasible.

**Remote Work**
Employees who can perform work from home or remotely may be encouraged or told to do so during an infectious disease outbreak or pandemic. The arrangement may be temporary or long-term depending on pandemic-related/contagion-related conditions such as public shelter-in-place orders, quarantines, childcare service disruptions or school closings and other related factors.

All remote or telework arrangements or requests will be determined on a case-by-case basis, considering factors including:

- Appropriateness of the job for telecommuting.
- Tenure.
- Employee performance.
- Flexibility.
- The reason(s) for telecommuting; and
- The ability to work independently.

The Firm will determine what equipment, if any, to provide to the employee to facilitate the remote or telework arrangement. The employee may designate a workspace or off-site work area for installing any equipment to be used while telecommuting. The employee will be expected to maintain the workspace in a safe condition, free from hazards to people and equipment.

**Cleaning and Disinfection**
In the event an employee or any other person at the workplace tests positive for an infectious disease, cleaning and disinfection protocols will be implemented in accordance with public health recommendations, including instructions and supplies for employees to disinfect their personal work areas. Employees should make efforts to avoid using other employees' phones, desks, offices or other work tools and equipment, when possible. If necessary, clean and disinfect them before and after use.

The Firm will take steps to clean and disinfect all facility areas that have been used or may have been used by a person with a confirmed positive test result for the disease or who exhibited disease symptoms while at work.

**Business Travel Restrictions**
The Firm will evaluate the risk of employee exposure to the infectious disease from business travel, and may restrict, cancel or ban business travel as necessary to minimize or prevent risk of infection. In making such determinations, consideration will be given to any travel bans or advisories issued by government agencies, including the U.S. Department of State and the CDC.

**Non-Essential Activities**
During an infectious disease outbreak or pandemic, we may postpone or cancel all nonessential activities, including meetings, gatherings and training sessions. Affected employees would be notified as soon as practicable.

**Relocation of Essential Activities**
The Firm will notify all affected employees in the event essential onsite facilities or activities must be relocated and will provide instructions to continue or resume essential functions.

**ATTENDANCE AND LEAVE**

**Attendance**
The Firm's attendance policies will remain in place during an infectious disease outbreak or pandemic, unless otherwise notified. If an employee has a challenge (e.g., childcare issues in the event of a school closure), they should speak to their supervisor to determine an alternative plan. Employees will be notified of any work schedule changes caused by an infectious disease outbreak or pandemic. Requests to adjust individual work schedules will be addressed on a case-by-case basis.

**Leave**
If an employee is out of work because of exposure to an infectious disease, or other illness or condition recognized by federal, state or local law, the employee may be required to submit additional information for the absence.

To the extent permissible by law, the Firm may modify its leave policies to reflect conditions during a declared infectious disease outbreak or pandemic.

**RETURN TO WORK**
Employees who have tested positive for an infectious disease and who have isolated or quarantined with symptoms of infection may return to work when they meet the criteria outlined by applicable public health guidance.

The Firm understands that doctors and other health care professionals may be too busy during and immediately after an outbreak to provide fitness-for-duty documentation. As such, we may rely on other credible sources such as local clinics to provide a form, a stamp or an email to certify that an individual does not have an infectious disease.

**COMPENSATION**
Employees will be paid for all hours worked during an infectious outbreak or pandemic. Employees will be notified of any changes in pay rates for non-exempt employee hourly rate of pay or exempt employee salary as a result of long-term business needs caused by significant business disruption or economic shutdown due to an infectious disease outbreak or pandemic.

**ONSITE WORK PROHIBITED**
The Firm reserves the right to prohibit an employee or another individual with a confirmed positive test for an infectious disease or who is displaying symptoms (even without a confirmed positive) or has been in close contact with someone with a confirmed or presumed positive test for an infectious disease from entering onsite facilities (internal offices or client offices), programs and functions if a determination is made that the entry introduces a recognized hazard to the workplace and the restriction protects the safety and health of employees, clients and others. Where possible, every effort will be made to accommodate such employees prohibited from onsite work with remote work, or other alternative work.

**CONFIDENTIALITY**
Infectious disease-related diagnostic information about employees will be treated as confidential, privileged information. All information about an employee's illness will be treated as a confidential medical record in compliance with federal or state law. The Firm will adhere to all federal, state and local public health reporting requirements.

**NO RETALIATION**
Employees who raise a concern or make a complaint regarding any aspect of this policy in good faith will not be retaliated against or penalized in any manner. Any employee who believes they have been retaliated against in violation of this policy should notify the CAO or Human Resources immediately.

## 7.8 Drug Testing

The Firm is committed to providing a safe work environment. The illicit use, possession, distribution, or sale of drugs in the workplace jeopardizes this commitment to safety and will not be tolerated.

Accordingly, the Firm bars the following conduct:

- Possessing, using, selling, dispensing, or manufacturing controlled substances at work.
- Reporting to work under the influence of illegal drugs; and
- Illegal use or abuse of prescription drugs.

Everyone shares in the responsibility for maintaining a safe work environment, and co-workers should encourage anyone who may have a drug problem to seek help. The goal of this policy is to balance our respect for individuals with the need to maintain a safe, productive and drug-free environment. Violations of this policy are subject to disciplinary action, up to and including termination.

In furtherance of this policy, the Firm may conduct random drug screening, reasonable suspicion testing, and testing as a follow-up to a previous test. The Firm will pay any employee their normal wage while tests are conducted. The Firm also will pay any associated testing fees.

Refusing to take any drug test may result in termination of employment. If an employee tests positive for drugs the employee may be terminated.

Employees are encouraged to report the need for assistance with a drug problem before being requested to take a test.

## 7.9 Firm's Right to Search

The Firm wishes to maintain a work environment that is free of illegal drugs, alcohol, firearms, explosives, or other improper materials. To this end, the Firm prohibits the control, possession, transfer, sale or use of such materials on its premises to the extent permitted by applicable law. We require the cooperation of all employees in administering this policy.

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

In addition, to ensure the safety and security of employees and clients, and to protect our legitimate business interests, we reserve the right to question and inspect or search any employee or other individual entering or leaving Firm premises or job sites. The inspection or search may include any packages or items that the individual may be carrying, including briefcases, handbags, knapsacks, shopping bags, etc.

These items are subject to inspection and search at any time, with or without prior notice. We also may require employees to agree to reasonable inspection of their personal property and/or person while on the job or on the Firm's premises. The individual may be requested to self-inspect their personal property or person by displaying the contents of any packages and/or turning out their pockets, etc., in the presence of a representative of the Firm, typically a management employee of the same gender. The Firm will not tolerate any employee's refusal to submit to a search.

## 7.10 Visitors

Restricting access to Firm premises helps maintain safety standards, protect against theft, ensure security of equipment, protect confidential information, safeguard employee welfare, and avoid potential distractions and disturbances. For this reason, only authorized visitors are allowed in the workplace and all authorized visitors, including friends, family and former associates, must register with the Receptionist. All visitors must be always escorted by a Brighton Securities employee.

Employees being visited are responsible for the actions of their guest(s). Should a guest of an employee act in such a manner that disrupts the normal working conditions of the Firm or threatens the security of the Firm and/or its employees, the employee accompanying the guest may be held responsible for the guest's actions and subject to disciplinary action, up to and including termination of employment.

The Firm reserves the right to verify the contents of packages and briefcases brought onto Firm premises by visitors.

If an employee suspects or becomes aware of any unusual situation, they should immediately notify their manager.

## 7.11 Signing In & Out

Employees are responsible for informing reception upon entering and leaving the building each workday. This can be done verbally, or by changing their status via phone assistant. Reception must always be apprised of any departure from or arrival to the office throughout the workday.

## 7.12 Building Security Access

The Firm's normal hours of operation are Monday through Friday from 8:00 AM to 5:00 PM. All commission-based and management level employees will be authorized to have a key to the building, as well as a security door code, to enter the building during non-working hours. The first Manager/Advisor to arrive on-site each day will unlock the door for the rest of the employees. Employees at the Rochester office are granted door fobs for the four (4) building doors that have a key fob entry system. The fobs are customized per employee based on the need for building access. Exempt employees have access to the building at any time. The hourly employees can only enter from 7a-6p Monday through Friday, excluding holidays. Any exception to this policy must be granted by the CAO or CEO. This policy is subject to change without prior notification.

# SECTION 8 – Firm Technology

## 8.1 Use of Electronic Resources

This policy describes the Firm's general guidelines for using its electronic resources, including e-mail, voicemail, internet access, computer systems, and cell phones (including smartphones and other mobile electronic devices).

Employees should use the Firm's electronic resources with the understanding that these resources are provided for the benefit of the Firm's business. Employees may use Firm electronic resources for personal use, during non-work times, as long as such use complies with Firm rules and applicable law. Employees should never use the Firm's electronic resources for personal use in a manner that interferes with their work duties or any responsibilities to clients.

Sending, saving, accessing, or viewing obscene or similarly offensive material on the Firm's electronic resources is prohibited. Messages stored and/or transmitted by the Firm's electronic resources, including the computer, voicemail, e-mail, or the telephone system, must not contain content that may reasonably be obscene or other patently offensive material. Prohibited material includes, but is not limited to, sexual comments, jokes or images, racial slurs, gender-specific comments, or any comments, jokes or images that would discriminate against or harass someone based on their race, color, sex, age, national origin or ancestry, disability, or any other category protected by federal, state, and local law. Likewise, any use of the internet, social media accounts, e-mail, or any other electronic resource, including the Firm’s social media account, to engage in harassment or discrimination prohibited by Firm policies is unlawful and strictly prohibited. Violators may be subject to discipline, up to and including termination of employment.

Unless otherwise noted, all software on the internet should be considered copyrighted work. Therefore, employees are prohibited from downloading software and/or modifying any such files without permission from the copyright holder.

**No Solicitation**
The Firm's electronic resources must not be used for solicitation purposes during working time. The Firm's no solicitation rule applies to the use of electronic resources.

**Software Code of Ethics**
Employees may not duplicate any licenses, software or related documentation for use either on the Firm's premises or elsewhere unless the Firm is expressly authorized to do so by agreement with the licenser. Unauthorized duplication of software may subject users and/or the Firm to both civil and criminal penalties under the United States Copyright Act. Employees may not give software to any outsiders including contractors, clients or others. Employees may use software on local area networks or on multiple machines only in accordance with applicable license agreements. Employees may not download software from the internet and install it on their computers.
The Firm reserves the right to audit any Firm computer to determine what software is installed on the local drive(s).

**Employee Responsibility**
Each employee is responsible for the content of all text, audio or images that they place or send using the Firm's electronic resources. The same standards should be utilized for the creation of e-mail messages in connection with an employee's work as would be utilized for other Firm correspondence or memoranda.

**Computer and Systems Security**
All computers and the data stored on them are, and always remain, the property of Brighton Securities As such, all messages created, sent or retrieved over the internet or the Firm's electronic mail systems are the property of the Firm, and should be considered Firm information. The Firm reserves the right to retrieve and read any message composed, sent or received using the Firm's electronic resources, including all computer equipment, e-mail, internet, or social media for any business reason, including but not limited to, ensuring compliance with this and all Firm policies.

Employees should be aware that even when a message is deleted or erased, it is still possible to recreate the message; therefore, ultimate privacy of a message cannot be ensured to anyone, and employees have no reasonable expectation of privacy when using a Firm computer, Firm e-mail, any social media accounts owned by the Firm, or the Firm's internet system. Accordingly, internet and e-mail messages are not private, and employees have no reasonable expectation of privacy while on the internet or sending or receiving email messages while using Firm technology. Furthermore, all communications including text and images can be disclosed to law enforcement or other third parties without prior consent of the sender or the receiver.

Employees should also be aware that duplicates of e-mail transmitted through a personal, web-based e-mail account on equipment not provided by the Firm could be stored on that equipment; likewise, information regarding internet sites that an employee has accessed may also be stored.

**E-mail Content Screening**
The Firm maintains the right to screen all inbound and outbound e-mail content. E-mail messages or attachments that contain obscene or similarly offensive material may be quarantined and held from transmission or receipt until the sender or recipient can verify the message or attached document is work related.

The Firm may, in its discretion, review communications to and from a personal account, subject to state laws regarding attorney-client communications.

If an employee wants to communicate with an attorney or send an otherwise confidential piece of communication that they do not want the Firm to monitor, the employee should consider using a personal e-mail address and personal computer equipment. If an employee does use Firm equipment, they consent to any monitoring by the Firm and should understand that they have no right to, or even a reasonable expectation of, privacy with respect to such communications, to the extent permissible under applicable law.

**Virus Protection**
To prevent computer viruses from being transmitted through the system, employees are not authorized to download any software from the internet onto their computer or any drive in that computer.

The Firm maintains virus protection software on all network servers and filters all inbound and outbound e-mail for virus attachments. E-mail containing a virus will be quarantined and both the sender and recipient will be informed. If the virus can be removed, the message will be forwarded to the recipient.

Employees found to be in violation of this policy will be disciplined up to and including termination of employment.

## 8.2 Bring Your Own Device

Brighton Securities' employees are permitted to use personal mobile devices such as cell phones, smart phones, tablets, PC's and laptops for business purposes and access to Brighton Securities e-mail/network/applications provided employees follow the procedures detailed herein. Brighton Securities reserves the right to terminate the use of personal mobile devices for business purposes if the employee violates any provision of this policy. Brighton Securities considers acceptable business use as activities that directly or indirectly relate to, concern or support Brighton Securities' business.

Employees should aim to keep personal conversations and communications on personal mobile devices to a minimum during working hours. Employees should try not to engage in personal conversation on personal mobile devices during meetings, training sessions, presentations, client meetings or at any time when clients are present unless advised otherwise by the employer. Employees have a right to use their personal mobile devices for communications in furtherance of their rights under Section 7 of the National Labor Relations Act ("NLRA") and to engage in protected concerted activity.

Personal mobile devices used for business purposes may not be used to store or transmit pornographic, obscene, harassing or offensive material, and content, to store or transfer confidential and proprietary information belonging to another individual or Firm, or to engage in outside business activities unrelated to the employer. In aiming to limit improper use of personal mobile devices such prohibitions do not apply to communications related to protected concerted activity under Section 7 of the NLRA.

In order to use a personal mobile device for business purposes, it must be explicitly approved by the CAO or the employee's direct supervisor. If an employee has a question regarding whether a device is permissible, the employee should contact the IT Manager or the CAO.
Employees may use personal mobile devices for business use and to access the Brighton Securities networks, services, data and applications. This includes email and remote desktop app to access their work PC. Employees are prohibited from accessing certain websites during working hours and while connected to the employer's network at the discretion of Brighton Securities or the employee's manager.

Employees may not access certain websites or applications while connected to the employer's network that will be distracting or pose a threat to or compromise the integrity of the employer's network.

In order to guard against unauthorized access and use, all personal mobile devices used by Brighton Securities' employees for business purposes must be password- protected.

Brighton Securities' confidential and proprietary information and trade secrets shall not be stored on an employee's personal mobile device and the employee should not gain access to such information remotely. If the employee must store or transmit data from the device, such information should be encrypted so as to protect the confidentiality information. This provision does not apply to information regarding employees or employee terms and conditions of employment related to employee rights under Section 7 of the NLRA.

Brighton Securities will not contribute monies to employees to cover the cost of the mobile device. Brighton Securities will not reimburse the employee for the cost of the plan and all applicable charges.

By using a personal mobile device for business purposes, employees are implicitly agreeing to have information backed up by the employer's server or cloud-based storage and that all such information, including emails and messages and social media posts and web browsing history, whether personal or work-related, will then be accessible to the Firm.

If an employee chooses to use a personal device for business purposes, the employee should understand that by doing so, they implicitly agree to permit Brighton Securities to monitor all firm-based communication occurring on the personal mobile device and that the employee is on notice that their expectation of privacy is limited under these circumstances. Brighton Securities will not monitor employees for any unlawful purpose including monitoring, or giving the impression of monitoring, employee union activity and protected concerted activity under Section 7 of the NLRA.

If a personal mobile device that is used for business purposes is lost, stolen or misplaced or accessed without authorization by a third party, the employee should notify Brighton Securities as soon as possible.

Employees are required to have all devices contain approved virus detection and prevention software as well as personal firewall protection to separate personal information and business information. Employees who have access to email and/or Remote Log in on their mobile device/tablet/personal computer are to have anti-virus software on the said device. In the event of a virus or malware infection on their device, IT reserves the right to change, lock, or disable credentials as well as quarantine devices from any network.

Employees must abide by all policies of the employer including those policies regarding discrimination, harassment, confidentiality and protection of Brighton Securities' trade secrets and proprietary information. The provisions regarding the protection of confidential information

belonging to the employer and clients do not apply to information regarding employees or employee terms and conditions of employment related to employee rights under Section 7 of the NLRA.

Brighton Securities reserves the right to take appropriate disciplinary measures, up to and including termination, if an employee fails to comply with the provisions of this policy.
Employees are expected to follow all laws regarding the use of cellular phones and personal mobile devices for employer related business while conducting employer-related business on a personal mobile device. This includes the use of a personal mobile device to send or receive text messages or emails. Employees are not permitted to use a personal mobile device while driving unless using a hands-free feature and must engage in safe operation of all vehicles.

Other parts of this Employee Handbook address the confidentiality of the Firm's trade secrets and other proprietary information. Employees should note that in raising any questions or concerns they may have about potentially illegal conduct, pursuant to the 2016 Defend Trade Secrets Act ("DTSA"):

- No individual will be held criminally or civilly liable under federal or state trade secret law for disclosure of a trade secret (as defined in the Economic Espionage Act) that is:
    - Made **in confidence to** a federal, state, or local government official, either directly or indirectly, or to an attorney, and made **solely for the purpose of** reporting or investigating a suspected violation of law; or
    - Made in a complaint or other document filed in a lawsuit or other proceeding, **if such filing is made under seal,** so that it is not made public.
- An individual who pursues a lawsuit for retaliation by an employer for reporting a suspected violation of the law may disclose the trade secret to the attorney of the individual and use the trade secret information in the court proceeding, if the individual files any document containing the trade secret under seal, and does not disclose the trade secret, except as permitted by court order.

When applicable protected concerted activity covered by the NLRA, or the particular collective bargaining agreement is not prohibited by this policy. This policy in no way prohibits employee communications that are protected under applicable federal and state laws, including but not limited to any activity that is protected under Section 7 of the NLRA which includes the right of employees to speak with others about their terms and conditions of employment.

## 8.3 E-mail Monitoring

We recognize employees need to be able to communicate efficiently with fellow employees and clients. Our e-mail and instant messaging ("IM") systems are intended for business use only. The use of the Firm's e-mail system to solicit fellow employees or distribute non-job-related information to fellow employees is strictly prohibited. Our Firm's policies against sexual and other types of harassment apply fully to the e-mail and IM systems. Violations of those policies are not permitted and may result in disciplinary action, up to and including termination of employment. Employees are also prohibited from the display or transmission of sexually explicit

images, messages, ethnic slurs, racial epithets or anything that could be construed as harassment or disparaging to others.

Employees shall not use unauthorized codes or passwords to gain access to others' files. All e-mail and other passwords must be always made available to the Firm. Employees must notify the IT department via SysAid each time their password is changed. Violations of this policy may result in disciplinary action, up to and including termination of employment.

For business purposes management reserves the right to enter, search and/or monitor the firm's private e-mail and IM systems and the files/transmission of any employee without advance notice and consistent with applicable state and federal laws and regulations. Employees should expect that communications sent and received by the Firm's computer system will be disclosed to management. Employees should not assume that communications that they send and receive by the system are private or confidential.

## 8.4 Remote Access

Remote access into the Firm's computer system is available for commission-based and management level employees. All remote access requests require prior approval from the CAO or CEO before IT grants such access.

Temporary, hourly/non-exempt employee are not required or expected to check email or perform work on the Firm's behalf, outside of normal or assigned working hours. Hourly/non-exempt employees are not to access the Firm's computer system when not working in the office. If any temporary, hourly/non-exempt employees have a requirement to work outside of their normal work hours using mobile technology or a home computer, they are required to:

- Receive prior approval to do so from their manager; and
- Record this time worked and submit to their manager as part of their timecard.

Any exceptions to this policy must be granted by the CAO or CEO and should be temporary in nature.

# SECTION 9 - Leaving the Firm

## 9.1 Separation from Employment

Employees of Brighton Securities are employed on an at-will basis. This means that employment may be terminated by either party at any time, for any lawful reason, or for no reason, with or without cause or notice. Nothing in this policy is intended to limit or alter the at-will nature of employment.

Employees may leave the Firm for a variety of reasons. Regardless of the reason, we strive to ensure that all separations from employment are handled fairly, efficiently, and in compliance with applicable federal and state laws.

Reasons for termination include, but are not limited to, the following:

**Voluntary Termination**
A voluntary termination means an employee has made the decision to end the working relationship with the Firm. Voluntary resignations include, but are not limited to, written or verbal resignation, retirement, or job abandonment. Subject to applicable federal, state, and local family medical leave and/or disability leave laws, an employee is considered to have abandoned their job if they fail to return to a job within three days and has not notified the Firm of their intention to resign.

Employees who voluntarily leave the Firm are encouraged to provide their manager with a minimum of two weeks' notice, ideally in writing, in order to allow a reasonable amount of time to transfer ongoing work. Upon resignation, an employee must return all keys, credit cards, or other Firm-issued property.

Employees in good standing who retire or resign from their positions may be eligible for re-hire.

**Involuntary Termination**
An involuntary termination occurs when the Firm decides to end the working relationship with an employee. Involuntary terminations may occur *for cause* or for reasons *other than cause*.

Involuntary terminations *for cause* include, but are not limited to, terminations for violating Firm policy, misuse or theft of resources, the falsification of information, excessive absence/tardiness or unsatisfactory work performance.

Involuntary terminations for reasons *other than cause* include, but are not limited to, a reduction in workforce.

Except where required otherwise by applicable state law, employment with Brighton Securities Corp. is at-will, meaning that it is not for a specified period and that the employment relationship may be terminated at any time for any lawful reason, or for no reason, with or without cause or notice, by the or the Firm, as long as any Firm-initiated termination is not based on an unlawful reason.

**Pay and Benefits Upon Termination**
Final wages will be paid in accordance with applicable law. Upon termination of employment, employees will not be paid for any paid time off ("PTO") that has accrued but remain unused through the last day of work.

## 9.2 Return of Firm Property

Employees are required to return all Firm property (e.g., computers, vehicles, passwords, ID badges, credit cards) that is in their possession or control in the event of termination of employment, resignation, retirement or layoff or immediately upon request. No information belonging to the Firm can be copied for the employee's use. We may also take all action deemed appropriate to recover or protect Firm property.

## 9.3 Exit Interviews

Before leaving Brighton Securities Corp, employees may be asked to participate in a voluntary exit interview. This will provide closure to the employee's employment with the Firm and will allow the Firm to ensure that it has resolved various administrative matters, answered any questions about continuation of benefits and listened to any of the employee's comments or ideas about improving the Firm's operations.

# SECTION 10 – Appendix

## 10.1 Privacy of Consumer Financial Information

Brighton Securities has adopted the following supervisory procedures in order to comply with Regulation S-P (adopted by the Securities and Exchange Commission in November 2000) and to protect the privacy of client financial information.

Employees are encouraged to review Regulation S-P and NMT 00-66 to augment their comprehension of privacy requirements.

## 10.2 Safeguarding Client Records and Information

The Firm and its employees are required to attempt to:

- Ensure the security and confidentiality of client records and information.
- Protect against any anticipated threats or hazards to the security or integrity of client records and information; and
- Protect against unauthorized access to or use of client records or information that could result in substantial harm or inconvenience to any client.

The Firm's offices are locked when the business is closed; unauthorized access is prohibited. Client records are maintained in a secure location and/or in an electronic form that is protected by password entry only and only those employees who are authorized and have been registered and fingerprinted have access to such records. Unauthorized access is strictly prohibited. The Firm's computer system is protected by firewall and anti-virus software.

Destruction of hard-copy confidential client information is accomplished via an outsourced secure document removal service. In the event the Firm wishes to purge electronic records or dispose of computer equipment the hard drive will be removed or magnetically erased to ensure that no confidential Firm or client information can be retrieved by unauthorized parties. Remote access to Firm computers will be strictly controlled and protected through passwords and encryption technology.

Registered representatives or other Firm employees using personal computers, laptops, or wireless devices in conjunction with Firm business or to access Firm computers are required to utilize only secure wireless or hard connections. Computer files must be password protected and the computer must have firewall and virus protection software to prevent unauthorized access.

The Firm will also ensure that any information maintained by a third-party, including but not limited to their clearing firm, is protected and that destruction of confidential Firm or client information is done in a manner to protect it from unauthorized access. The treatment of such confidential information by third parties should be contained within the Firm's contract with those parties or in a separate confidentiality agreement signed by the vendor.

If any person associated with the Firm detects or becomes aware of any breaches to the Firm's electronic or paper records that could comprise confidential information, they must immediately notify the Chief Executive Officer (CEO) and/or the Chief Administrative Officer (CAO). The CEO and/or the CAO will investigate any reported breaches. If the breach comprised client confidential information, the Executive Representative and/or or CAO will immediately notify state or federal regulatory agencies, if applicable, take any necessary steps to secure the information from future breaches, and notify clients regarding the compromise and any remedies available to them to detect or prevent possible identity theft or other issues relating the breach.

The treat or potential threats to the security of client information is also addressed in the Firm's Business Continuity Plan, as are the Firm's information back-up systems, please reference that document for details. For a discussion of permitted communications via electronic means and the protection of information see **Section 8, Firm Technology.** The CEO or CAO will be responsible for overseeing the strict adherence to these policies.

**Who is protected?**
The Regulation protects only individuals; therefore trusts, partnerships and corporations are not protected. Beneficiaries of trusts, 401(k) participants, and shareholders of corporations or partners of partnerships are not protected. IRA beneficiaries are protected since they are individuals. Institutional investors are not covered by the regulation and no disclosures are required to be made to institutional clients.

**What is protected?**
With certain exceptions, outlined below, Brighton Securities Corp is required to protect nonpublic personal information ("NPI") defined as personally identifiable financial information ("PIFI") acquired from the client PLUS any list, description or other grouping of client derived from using any PIFI. In general, PIFI would include all information of a personal nature supplied on account applications, questionnaires and other information provided in order to obtain accounts, obtain credit, or enter into advisory or other relationships, etc.

NPI does not include information that Brighton Securities Corp has taken steps to verify and reasonably believes could lawfully be obtained from local, state, or federal government records, widely distributed media (telephone book, television, website, or radio program) or disclosures to the general public required to be made by local, state, or federal law.

In addition, Regulation S-P protects account number information. The Regulation (with certain exceptions) prohibits Brighton Securities Corp under any circumstances from disclosing to any non-related third party ("NTP") other than a consumer reporting agency, a client account number or similar form of access number or access code for a credit card account, deposit account, or transaction account if such disclosure is for use in telemarketing, direct mail marketing or other electronic mail marketing. Regulation S-P also controls re-disclosure and reuse of any NPI.

Regulation S-P specifically requires the Privacy Notice to state that Brighton Securities Corp may disclose NPI about former clients as well as current ones. The regulation does not require that a Privacy Notice be provided to any former client.

**BRIGHTON SECURITIES CORP DOES NOT DISCLOSE ANY CUSTOMER OR CLIENT NON-PUBLIC INFORMATION TO NON-RELATED THIRD PARTIES OTHER THAN IN CONTROLLED CIRCUMSTANCES AS SPECIFICALLY ALLOWED BY REGULATION S-P.**

**How is it protected?**
With certain exceptions (consult Rule) Brighton Securities Corp may not disclose NPI of any client to any NTP without prior notice and consent by the client. An NTP is any person, firm or corporation that is not controlled by, controlling or under common control with Brighton Securities NOTE: if any other government regulator treats Brighton Securities Corp as an "affiliate" of a company regulated by it, then Brighton Securities Corp is also an "affiliate" of that company for the purposes of Regulation S-P and may disclose NPI to that company.

**Notice Requirements**
*Initial Privacy Notice Requirement*
The Regulation requires Brighton Securities Corp to provide an Initial Privacy Notice to:

- Every client at all times; and
- Every client and "consumer" (see note below) where Brighton Securities Corp intends to disclose that clients NPI to any NTP under any non-exempt circumstances.

Each recipient must also be provided with a "reasonable" time to "opt out" or not.

**NOTE:** If the Firm does not share NPI, it does not have to provide initial and annual notices or opt-out choices to each "consumer" – that is an individual who obtains or has obtained a financial product or service from the Firm that is to be used primarily for personal, family or household purposes. Typically, a consumer has no further contact with the Firm other than the one-time delivery of products or services (versus a client, who has an on-going relationship with the Firm). The designated Principal must ensure that this distinction is well understood and accurately applied.

The Initial Privacy Notice must be provided to the client, with certain exceptions, AT OR BEFORE the time Brighton Securities Corp establishes the client relationship or before the Firm makes any disclosures of that client's NPI to an NTP. The Initial Privacy Notice may be provided in written or electronic form (if the client is able to acknowledge receipt electronically).
The expectations are as follows:

- The Initial Privacy Notice may be provided at a "reasonable" later time where:
- The client relationship has been established without the client's knowledge or consent (i.e. an ACATS transfer or SIPC trustee transfer).
- Where to provide the Notice would substantially delay the client's transition and the client has agreed to receive the Notice later; or
- Where the NTP establishes an account or purchases securities on behalf of the client.

Once provided to a particular individual, the Initial Privacy Notice does not have to be provided again every time a new product or service is obtained by that individual, if the Initial Privacy Notice and any subsequent Annual Privacy Notices are current and accurate as to that product and/or service.

**"Opt Out" Provision**
Brighton Securities' Privacy Notice advises each client as to NPI that may be disclosed unless there is an objection. Included in the Privacy Notice is a place where the client can object or "opt out" by notifying the Firm that they do not want all or part of the NPI to be disclosed. The "opt out" is ongoing and can be changed by the client at any time in writing. Where Brighton Securities Corp changes any NPI category, a new Notice and "opt out" option must be provided to the client. The client may not "opt out" of the exceptions to NPI disclosure described in Regulation S-P. These exceptions are noted in the Firm's Privacy Notice.

The Privacy Notice must include the disclosure that NPI may be shared among affiliated entities in compliance with the notice requirements of Section 603 of the Fair Credit Report Act, and that the client may "opt out" of this sharing provision.

**Annual Privacy Notice**
Brighton Securities is required to provide an Annual Privacy Notice to each client every 12 months if they remain a client. Once they cease to be a client no further notice is required. The Firm sends its Annual Privacy Notice each year to all covered persons. The Annual Privacy Notice may be delivered over the Firm's website if the client agrees in advance. The Privacy Notice must give the client an opportunity to "opt out" within a reasonable time of receiving the Notice.

**Books and Records Requirement**
The Firm maintains records to evidence the delivery of Privacy Notices to clients. Copies of Notices are kept in the client's account records. Each "opt out" choice is perpetual unless affirmatively revoked by the recipient.

The Firm is committed to protecting the confidentiality, security and integrity of all its client's NPI. Compliance with the procedures descripted within this policy is intended to ensure such protection.

**Superseding Authorities/State Regulations**
Regulation S-P does not modify, limit or supersede the Fair Credit Reporting Act (15 U.S.C. 1681), particularly Section 603 that allows companies to provide selected credit information to lenders. In addition, Regulation S-P does not supersede, alter, or affect any state law or regulation that establishes and imposes different information protection standards. Accordingly, the Firm should be aware of comparable provisions in states where it is doing business. For example, some jurisdictions, including Massachusetts and Nevada, have enacted legislation that establishes minimum standards to safeguard personal information in electronic records. These laws contain potential penalties against persons and entities for failures to adequately safeguard electronic information containing personal information. The CCO must attempt to conform to these state regulations when applicable.

# Complaint Form for Reporting Sexual Harassment

*Brighton Securities*

New York State Labor Law requires all employers to adopt a sexual harassment prevention policy that includes a complaint form to report alleged incidents of sexual harassment.

If you believe that you have been subjected to sexual harassment, you are encouraged to complete this form and submit it to Human Resources, Danielle Wilkins (CAO), or Melissa Hawryschuk (CEO). You will not be retaliated against for filing a complaint.

If you are more comfortable reporting verbally or in another manner, your employer should complete this form, provide you with a copy and follow its sexual harassment prevention policy by investigating the claims as outlined at the end of this form.

**For additional resources, visit: ny.gov/programs/combating-sexual-harassment-workplace**

## COMPLAINANT INFORMATION

Name:

Work Address: Work Phone:

Job Title: Email:

Select Preferred Communication Method: ☐Email ☐Phone ☐In person

## SUPERVISORY INFORMATION

Immediate Supervisor's Name:

Title:

Work Phone: Work Address:

**COMPLAINT INFORMATION**

1. Your complaint of Sexual Harassment is made about:

   Name: Title:

   Work Address: Work Phone:

   Relationship to you: ☐Supervisor ☐Subordinate ☐Co-Worker ☐Other

2. Please describe what happened and how it is affecting you and your work. Please use additional sheets of paper if necessary and attach any relevant documents or evidence.

3. Date(s) sexual harassment occurred:

   Is the sexual harassment continuing? ☐Yes ☐No

4. Please list the name and contact information of any witnesses or individuals who may have information related to your complaint:

*The last question is optional but may help the investigation.*

5. Have you previously complained or provided information (verbal or written) about related incidents? If yes, when and to whom did you complain or provide information?

If you have retained legal counsel and would like us to work with them, please provide their contact information.

*Signature:* _____ *Date:* _____

# EMPLOYEE HANDBOOK RECEIPT ACKNOWLEDGEMENT

I acknowledge receipt of the Brighton Securities Employee Handbook which describes Firm policies, an overview of current employee benefits, and my obligations.

I understand that the policies contained in this handbook are not intended to create a contract of employment nor is any other communication by a management representative, either express or implied, intended to be a contract, unless explicitly stated otherwise in a written agreement signed by the **CEO** of our Firm.

I understand that this handbook is not a guarantee of employment for any set period and that either the Firm or I may terminate my employment at any time, with or without cause. Furthermore, I understand that the policies and benefits described in this handbook may be added to, revised or deleted at any time.

I agree to read and study the contents of this manual. It is understood that Brighton Securities retains the right to make decisions involving employment as needed in order to conduct its work in a manner that is beneficial to the employees and the company.

_____

Employee's Name (Printed)

_____

Employee's Signature

_____

Date