

BTS Group health and safety policy 2022

This policy document complements "BTS Code of Business Conduct" and serves as a guide to our Head of Offices.

The policy needs adaption to regional, national or state laws and requirements, see "Disclaimer" below for further clarification.

Disclaimer

This policy document serves as a general guideline to be adapted to local laws and regulations.

BTS Group may change, delete, suspend or discontinue any part or parts of this policy at any time without prior notice. Any such action shall apply to existing as well as future employees. Continuation of employment after such action constitutes consent of such action.

Additionally, BTS reserves the right to respond to specific situations in whatever manner it believes best suits the needs of BTS. Consequently, BTS' actions may vary from the attached policies and procedures, or any subsequent policies and procedures implemented if determined by management to be in the best interests of BTS.

Furthermore, BTS' actions may be guided by other policies and procedures, which are not contained in this document. This document is merely a guide and is not the final policy or procedure on all matters that impact a BTS employment. The policy does not create a contract of employment for any specific duration or otherwise alter your at-will employment relationship with BTS.

Except as otherwise described in this document, the provisions contained in this document supersede all previous oral or written communications, discussions, and policies with respect to the terms and conditions of employment at BTS. BTS has employees working in a variety of different regions and countries. BTS complies with all applicable national, state, and local laws. Should any policy or procedure set forth in this document violate applicable national, state or local law shall be controlling.

People Experience Team in this document refers to a team formed by the regional HR managers.

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Employee standards

Employee standards

BTS is a fundamentally people-driven enterprise and is defined by its' employees. Employee conduct with customers, employees, and stakeholders must therefore be characterized by a high standard of business ethics, compliance with laws and regulations and adherence to good business practices in a setting of honesty, integrity and respect for human rights. This document and guide will highlight what is not ok and to make the boundaries for our standards more clear.

BTS Code of Business Conduct document includes expectations on BTS employees' conduct at the office and in client engagements. The code includes equal opportunities and diversity, personal conduct including any sort of harassment, and business ethics.

We expect our employees to conduct themselves in a responsible, professional, and honest manner at all times. The following is a partial list of prohibited conduct (an illustrative sample): Insubordination, unauthorized removal of BTS property or equipment, vulgar or abusive language or behavior, failure to comply with office procedures relating to office security, safeguarding of BTS or client information (such as removing proprietary information from the office or leaving such information out in the general office area) and general office procedures, violation of Code of Business Conduct.

Alcohol, drugs, and smoking

BTS strictly prohibits the possession of alcohol or drugs on BTS premises, and intoxication from drugs or alcohol while performing BTS business either in-person or virtually. BTS prohibits employees from reporting to work under the influence of alcohol or drugs. On occasion there will be BTS sponsored events where BTS will provide alcohol. On those occasions' employees are expected to drink responsibly so as not to risk personal injury to oneself or others nor to injure the reputation and good standing of BTS, associates or oneself.

Arms

Employees are not permitted to carry (either openly or in a concealed manner) any firearms while on BTS's premises or property or while acting as a BTS representative at any work-related activities, meetings, or functions.

Absences

Failing to provide advanced notice of an absence and omitting to electronically record it in an appropriate BTS system is unacceptable and may lead to immediate reprimand or corrective action, including termination.

Absence from work for any period of time without a legitimate reason is similarly unacceptable and may lead to disciplinary action. Legally protected absences under the national laws, or applicable paid sick leave laws will not result in a disciplinary action for violations of this policy.

In the event of absences due to illness, physical or mental incapacity, where an employee is absent for three or more days, the *People Experience Team* may request a doctor's statement prior to the employee's return to work. Prompt and timely notice of family or medical leave, discussed below, is required.

Diversity, equity and inclusion

We realize that our strength and competitive advantage lies with our people, and we are proud of the efforts made to foster an environment of inclusion, acceptance, respect and cooperation. We recognize that diversity among colleagues fosters innovative thinking and creative problem-solving, which in turn has a positive impact on our organization's overall success. Our expectations are clearly expressed in the Code of Business Conduct, however due to the level of importance we repeat it here in our health and safety policy.

BTS does not tolerate discrimination or harassment on the grounds of race, disability, gender, age, religion or philosophical belief, nationality, political belief, sexual orientation, family status, pregnancy, trade union activity, level in the organization, role in the organization, or any other factor!

All employees have a personal responsibility for seeing to that we treat one another with respect accordingly.

Reporting violations

Any employee who feels that he or she has suffered any form of discrimination, harassment, or retaliation by anyone must immediately report the alleged conduct to his or her manager and the *People Experience Team* so that an investigation of the complaint can be undertaken. If your complaint concerns your manager, you should immediately report any concerns to the *People Experience Team*. Any employee who observes conduct by another employee which he or she believes to be harassing, retaliatory, or discriminatory must report such conduct as outlined above.

Issue resolution policy

BTS is committed to maintaining a workplace where employees are free to raise good faith concerns regarding BTS' business practices, specifically:

- Reporting suspected violations of law on the part of BTS, its employees, agents or representatives, including but not limited to national and state laws and regulations.
- Providing truthful information in connection with an inquiry or investigation by a court, agency, law enforcement, or other governmental body.
- Identifying potential violations of BTS established policy, including Code of Business Conduct and the policies contained in BTS' Employee Document.

If an employee has knowledge of or a concern of illegal, inappropriate, dishonest or fraudulent activity, or other unfair treatment, the employee is to immediately report it to the *People Experience Team*.

Reports of suspected violations of law or policy and reports of retaliation will be investigated promptly, and in a manner intended to protect confidentiality, consistent with a full and fair investigation.

Employees are expected to use this procedure in a responsible manner. Any employee who makes a complaint that he or she knows to be false may be subject to disciplinary action up to and including termination.

Reports of suspected violations of law or policy and reports of retaliation will be investigated promptly, and in a manner intended to protect confidentiality, consistent with a full and fair investigation.

Corrective action and termination

Although BTS hopes that our relationships with our employees are long-term and mutually rewarding, on occasions where performance or conduct does not meet BTS expectations, corrective action, including termination, may be necessary. Corrective Action will generally be determined based on the nature of the offense or deficiency, the work history of the employee and the business needs of BTS.

However, Corrective Action is not to be considered a step disciplinary process. As an “at-will” employee, BTS reserves the right to terminate the employment relationship at any time, with or without corrective action, cause or notice, for any lawful reason.

Management may skip certain disciplinary steps or repeat certain disciplinary steps depending on particular facts of each situation. This policy in no way implies any kind of contract or obligation to follow any particular disciplinary procedure or otherwise alters the at will employment relationship.

Health, safety and insurance

When reviewing our healthcare coverage every year, we consider the following priorities:

Employee wellness

Our goal is to improve the health and wellbeing of BTSers through health education and activities that support healthy lifestyles.

Health insurance

BTS health plan policies and practices comply with national and privacy laws and employees will receive a notice when enrolled in local medical and/or dental insurance plans.

If you leave BTS employment you may be eligible to continue your elected coverage for a time specified in national legislation. Following your departure from BTS, you may, depending on national or state regulations, receive enrollment materials.

Work-related injury reporting and compensation

BTS is covered under national or state labor compensation laws. Should you sustain a work-related injury, you must immediately notify your manager and the *People Experience Team*. Compensation leave runs concurrently with national or state regulations, and local statutory leave. The failure to timely report an on-the-job injury may impact your rights to workers' compensation benefits.

Safety requires every employee to be careful and to use common sense. All employees should be continuously aware of their actions and the environment around them to avoid dangerous situations.

In the event you suffer any work-related injury, no matter how slight, or you witness another employee suffer such an injury, you must immediately report the injury to the *People Experience Team*. A workplace-related injury may fall under a BTS local insurance coverage and in order to assure swift and complete benefits the sooner such an injury is reported, the better for you and BTS. Should the injury require the attention of a doctor; in the case of an emergency, the employee should go to the nearest hospital emergency room for treatment.

In the office or when staying at hotel and conference centers please take a moment to make sure that you know the exact location of each exit route in your office building, this includes stairwells and emergency exit doorways. Elevators will shut down and remain out of use during certain building emergencies.

Inclement weather/ Emergency closing

Whenever possible, it is our plan to maintain regular business hours. If there is a development of such extreme intensity that appears to jeopardize everyone's safety, a decision may be made by office leadership to close an office.

In the end, however, driving in bad weather is a personal decision rather than a business decision. Therefore, if BTS' decision to keep the office open during inclement weather puts an employee in an uncomfortable position, they are free to work from home if possible.

Media presence

Employee files

BTS maintains an employee file on each employee of BTS. This file contains a history of employment and you may review your own file if you wish. Please advise the *People Experience Team* if you would like to see your records. Be sure to advise the *People Experience Team* of any changes in address, marital status, etc.

Employees are required to keep the following items up to date in their file: name, address, cell phone number, person to notify in an emergency, number of dependents.

If an employee disagrees with information contained in the files, he or she may request a correction. If BTS and the employee cannot agree regarding the correction, the employee may submit a written statement of his or her position to the employer and the employer must keep the statement in the file.

Employee privacy

BTS believes that each employee is entitled to individual privacy. Therefore, BTS will provide only confirmation of employment, dates of employment and position to anyone making an inquiry about an employee's previous or current employment. For more detailed information to be given, including salary information, the employee must sign a release form expressly authorizing the information to be disclosed. BTS however reserves the right to disclose employee information as may be required by law or regulation.

BTS believes that hiring qualified individuals to fill positions contributes to our overall strategic success. It is therefore our policy to conduct background investigations of employment candidates as part of the employment process. This type of information is collected as a means of promoting a safe work environment for our current and future employees. All background checks will be conducted in accordance with national or state laws.

Use of employee photos and videos

As we continuously update our marketing materials and our careers site, it is important that we make these as relatable and personable as possible. BTS shows our work in action and does occasional consultant profiles in support of our recruiting activities. As part of this, we like to feature photos and videos of our most valued assets – our employees. As part of this process, we ask employees to sign a non-mandatory release form.

Social media, computer, internet and online services

Please refer to our IT security policies, acceptable use and privacy policy.

Workplace flexibility and time off

Workplace flexibility

At BTS, we support workplace schedule flexibility to ensure our employees have work/life balance. Workplace flexibility is reflected in our Time Off programs and Working from Home policy. BTS offers various alternative work arrangements such as part-time status options, summer hours, flexible start and finish times, and leave options. Work schedules should be discussed with your manager and the *People Experience Team*.

Working from home

Working from home is an alternative work arrangement agreed upon between the employee and manager, with the needs of the business taking priority.

Working from home may be formal (remote employee with home-based office) or informal (occasionally working from home). Employees are expected to be available and accessible during times they are working at home. Arrangements should be discussed with your manager and can change at any time. All employees will be required to maintain the confidential nature of all confidential information and trade secrets while working remotely and will be required to designate the workspace at their home. Non-exempt employees will be required to accurately record all time worked from home and are prohibited from working off-the-clock.

Time away from work

We believe BTSers should be empowered to manage the amount of time they take away from work. BTS expects employees to be responsible with this freedom, and to effectively manage workload and time away. Four principles should guide employees: Enjoy life, Plan ahead, Communicate, and Be accountable.

BTS follows national and state laws that regulates opportunities for different types of leave: paid time off, family time away from work (parental leave, family leave), medical leave, sabbatical, bereavement leave, jury duty, military leave, lactation, and other legally protected absences. For any questions and support contact the *People Experience Team*.