

*Ocean Partners
Hospitality, LLLP*

Associate Handbook

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Welcome to Ocean Partners Hospitality!

We are pleased to have you join our team! It is you, the associate, who makes Ocean Partners Hospitality LLLP ("OPH" or "The Company") a successful organization. We want you to feel proud of where you work and of what you are doing so that your pride will reflect positively in the services we provide to our guests.

Our goal is to provide our guests with the quality of rooms, service and overall satisfaction that consistently exceeds their expectations. We want them to come back to us and to think of us as their home.

OPH is an exciting place to work and it offers great opportunities for all of us. We want our organization to be successful and we want you to be successful! People make the difference and you can make OPH a winning team!

This handbook outlines the policies, programs, and benefits available to eligible associates of Ocean Partners Hospitality LLLP. It was also developed to describe some of the expectations we have of our associates. The associate handbook will answer many questions about employment with OPH so I suggest that you familiarize yourself with the contents of the associate handbook as soon as possible

We hope that your experience here will be challenging, enjoyable, and rewarding. Again, welcome!

Sincerely,

Matthew Kent
General Manager



ABOUT THIS HANDBOOK

This Associate Handbook ("Handbook") is expressly intended for the use of OPH's associates. This Handbook sets forth basic policies and expectations for associate conduct and also contains important summary information regarding associate benefits.

Unless otherwise specified, the benefits described in this Handbook apply only to OPH's regular full-time associates. By contrast, the policies outlined in this Handbook apply to all associates - introductory, regular full-time, regular part-time and seasonal. In all cases of interpretation of this Handbook, management decisions are final. OPH may modify any part of this Handbook at its sole discretion, without prior notice. This Handbook supersedes and replaces all previously existing OPH handbooks and personnel policy manuals.

ALL OPH ASSOCIATES ARE EXPECTED TO FOLLOW THE POLICIES AND PROCEDURES OUTLINED IN THIS HANDBOOK. ANY VIOLATION OF THESE OR ANY OTHER OPH POLICY, PRACTICE OR PROCEDURE WILL SUBJECT AN ASSOCIATE TO DISCIPLINE, UP TO AND INCLUDING SEPARATION.

Employment at OPH is at-will. OPH may discharge an associate at any time, for any reason whatsoever, with or without cause, and with or without notice. Nothing within this handbook or within the Company's policies, practices or procedures is intended to create a contract for employment, express or implied, a guarantee of continued employment for a specific duration or interfere with, restrain, or prevent associate communications regarding wages, hours or other terms and conditions of employment.

Associates should contact the Human Resources Manager or my Supervisor with questions concerning the contents of this Handbook.

GUEST RELATIONS

Customers and guests are among our organization's most valuable assets. Each of you represents OPH to our guests and the public. The way we do our jobs presents an image of our entire organization. Guests judge us by how they are treated each time they have contact with us. Therefore, one of our top business priorities is to assist any guest or potential guest. Nothing is more important than being courteous, friendly, helpful, and prompt in the attention you give to guests.

OPH will provide guest relations and services training, including ADA training, to all associates who have extensive guest contact. Remember that your contact with the public in person, over the telephone, and through all your communications reflect not only on you but on OPH as a whole. Positive guest relations will not only enhance the public's image of OPH, but also pay off in greater customer loyalty and increased sales and profit.



Equal Employment Opportunity

OPH is committed to providing equal employment opportunities for all individuals. This Equal Employment Opportunity ("EEO") Policy is an integral component of all our employment policies, practices, and procedures. OPH will recruit, hire, train, and promote persons in all positions without regard to race, color, religion, national origin, sex, age (except where sex or age is a bona-fide occupational qualification, as defined by law), or physical or mental disability or other protected status.

The Company will make employment decisions so as to further the principle of EEO. The company will ensure that promotion decisions are in accord with principles of EEO by imposing only valid and non discriminatory requirements for promotional opportunities. OPH will also ensure that all personnel decisions and actions, including but not limited to compensation, benefits, transfers, promotions, layoffs, discipline, terminations, training, and education will be administered without regard to race, color, religion, national origin, sex, age or disability. All associates are required to comply with our EEO Policy. Managers and supervisors are expected to cooperate fully in meeting our equal employment opportunity objectives and their compliance with this policy will be monitored closely.

Immigration Law Compliance

OPH is committed to employing only United States citizens and aliens who are legally authorized to work in the United States. We do not unlawfully discriminate on the basis of citizenship or national origin.

In order for us to comply with the Immigration Reform and Control Act of 1986, all new associates, as a condition of employment, must complete the Employment Eligibility Verification Form I-9 and provide documentation that establishes their identity and eligibility for employment. Former associates who are subsequently rehired must also complete an I-9 and provide appropriate documentation if 1) they have not completed an I-9 with OPH within the past three years, or 2) their previous I-9 is no longer valid or was not retained.

If you have questions or want more information on immigration law issues, you are encouraged to contact the Human Resources Manager. At OPH you can raise questions or complaints about immigration law compliance without fear of reprisal.

Disability Accommodation

OPH is committed to complying fully with the Americans with Disabilities Act (ADA) and ensuring equal opportunity in employment for qualified persons with disabilities.

All employment practices and activities are conducted on a non-discriminatory basis. Our hiring procedures have been reviewed and provide persons with disabilities meaningful employment opportunities. **Pre-employment inquiries are made only regarding an applicant's ability to perform the duties of the position.**

We make all employment decisions based on the merits of the situation in accordance with defined criteria of the position, not the disability of the individual.

Qualified individuals with disabilities are entitled to equal pay and other forms of compensation (or changes in compensation) as well as job assignments, classifications, organizational structures, position descriptions, lines of progression, and seniority lists. This policy is neither exhaustive nor exclusive. OPH is committed to taking all other actions necessary to ensure equal employment opportunity for persons with disabilities in accordance with the ADA and all other applicable federal, state, and local laws.

Business Ethics, Conduct and Work Philosophy

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

Our continued success is dependent upon our guests' trust and we are dedicated to preserving that trust. Associates owe a duty to OPH, our guests, and shareholders to act in ways that will merit the continued trust and confidence of the public.

As an organization, OPH will comply with all applicable laws and regulations and we expect our directors, officers, and associates to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.

In general, you should find that using good judgment, based on high ethical principles, will guide you to act appropriately. If you are unsure about the proper course of action, you should discuss the matter openly with your supervisor. If necessary, you may also contact the Human Resources Manager for advice and consultation.

Every OPH associate must comply with OPH's policy of business ethics and conduct.

The Work Philosophy at OPH is to treat our associates and guests with dignity and respect. This allows us to grow and prosper. Because we value our associates, we will:

- Strive to create a dynamic, responsible organization and climate which encourages and acknowledges individual contributions and promotes team effort.
- Provide competitive pay and benefits.
- Promote from within to the greatest extent possible.
- Work to promote continuous, two-way communications between associates and management.
- Respond to associate concerns.
- Provide a safe and pleasant working environment.

Always remember: Excellence = Quality = Superior Service

Our Beliefs

We are an organization committed to integrity, honesty and passion for quality and innovation. We support a work environment that allows our associates to grow personally, professionally and financially. We create positive memorable experiences for every guest. We work hard and have fun in the workplace. We profit by living these ideals.

We Stand For:

- All associates are to promote guest relations
- Continual career development for everyone
- Everyone should practice diplomacy, courtesy, professionalism without superficiality
- Everyone must be approachable
- Everyone must be a team player for the overall success of the company
- Everyone must be self motivated
- Everyone must develop leadership skills
- Everyone must continuously learn new skills
- Everyone must be respectful of one another and be cordial
- Everyone's voice must be appreciated and heard
- Management should do what they said they were going to do
- Management should be made up of people with the highest of integrity
- Reliability is key
- True hospitality champions train hard

Will Not Tolerate:

- Abuse of power or position
- Any disrespect from anyone to anyone else
- Back stabbing
- Being late to meetings
- Divulging confidential information to guests or competitors
- Bullying
- Clients or guests that abuse our staff
- Cross departmental rivalry
- Dealing in blame
- Fighting - at any time
- Gossiping, whining, complaining in front of guests
- Hiding from accountability
- Lack of teamwork
- Management through intimidation
- Managers who are not good coaches
- Non-compliance with standards
- People who try to make their own rules
- Shirking or dumping responsibility

Associate Conduct Policy

Understandably, guidelines and expectations for associate performance and behavior are necessary to have an efficient and successful hotel. All such associate activity must center on our goals of **customer service, teamwork, profitability and safety**. Obviously, any behavior that impedes the accomplishment of our goals will be considered improper. Therefore, the practice of good common sense will help us achieve our goals. A violation of any of OPH's policies and procedures is considered misconduct and appropriate disciplinary procedures will be initiated. Disciplinary action may include, but is not limited to, the following: an oral reprimand with a notation in your personnel file, written warning, suspension from work without pay and separation. There is no guarantee that one form of disciplinary action will necessarily precede another. Below are some examples of poor judgment and inappropriate behavior that will not be tolerated:

- Supplying false or misleading information when applying for employment or at any time during your employment.
- Altering or falsifying any OPH record.
- Possessing weapons on premises or off premises while performing your Hotel duties, unless otherwise permitted by applicable law.
- Soliciting gratuities or "kick backs" in any way from vendors doing business with the Hotel.
- Theft or unlawful possession of stolen, lost or misplaced Hotel property, including records, or the property of a guest or another associate. All articles found on Hotel property must be turned in to Lost and Found.
- Divulging information regarding guests, unless pursuant to lawfully served court or government subpoena.
- Unauthorized presence at guest functions and in guest areas, or in the premises, including guest's rooms, bars or lounge areas.
- Committing immoral or indecent conduct; soliciting persons for immoral purposes; or aiding/and/or abetting any of the above.
- Possessing, selling, using or being under the influence of illegal drugs or substances at any time while on Hotel premises or in uniform, unlawfully using or misusing legal drugs at anytime while on Hotel premises or in uniform or possessing, using or being under the influence of alcohol while on duty or in uniform.
- Refusing or failing to perform assigned work, to follow a supervisor's instructions or any act of insubordination.
- Gambling on Hotel premises.
- Engaging in any act of violence or disorderly conduct, threatening or using abusive language, swearing, bullying or similar acts to guests, supervisors or other associates.
- Being grossly negligent or careless.
- Failing to report to work without notifying your supervisor.
- Failing to follow safety, health and fire regulations.
- Failing to timely report an accident.
- Failing to maintain high degree of personal cleanliness when reporting to work. Failing to wear prescribed clothing in good repair, and an approved name tag.
- Being excessively absent or tardy.
- Failing to notify your Supervisor two (2) hours prior to your shift, if you will be late or absent.
- Failing to punch in and out in accordance with the instructions of your Supervisor.
- Working overtime without prior authorization from Department Manager.
- Dining, snacking or smoking in other than designated areas.
- Unauthorized using of Hotel telephones, since such telephones are for business use only.
- Using cell phones for personal use unless during your break.
- Per safety training, being on premises before or after scheduled shift without notifying the General Manager, Manager on Duty or your Supervisor.

Employment Categories

Understanding the definitions of the employment classifications at OPH is important because your classification is one of the factors that determine your employment status and benefit eligibility. These classifications do not guarantee employment for any specified period of time. Since employment with OPH is based on mutual consent, either you or OPH have the right to terminate the employment relationship at will at any time, with or without cause or advance notice.

Depending on your position, you are designated as either NONEXEMPT (Hourly) or EXEMPT from federal and state wage and hour laws. NONEXEMPT associates are subject to the minimum wage and overtime provisions of the Fair Labor Standards Act (“FLSA”). Non-exempt associates are compensated based upon the number of hours worked each workweek. EXEMPT associates are exempt from the minimum wage and overtime provisions of the FLSA and paid on a salary basis. Your EXEMPT or NONEXEMPT classification may be changed only with written notification by OPH management.

In addition to the EXEMPT and NONEXEMPT categories, you also belong to one of the following employment categories:

INTRODUCTORY: associates who are in their first 90 days of employment.

REGULAR FULL-TIME associates are associates who are not in a temporary or introductory status AND whose regular work schedule at OPH averages 30 hours or more per week. Generally, Regular Full-Time associates are eligible for all OPH benefit programs, subject to the terms, conditions, and limitations of each benefit program.

REGULAR PART-TIME associates are associates who are not in a temporary or introductory status AND whose regular work schedule at OPH averages less than 30 hours, but at least 20 hours per week. Regular Part-Time associates are eligible for some OPH benefit programs, subject to the terms, conditions, and limitations of each benefit program.

SEASONAL associates are associates who are hired on an interim basis, work under 20 hours per week, or assist in the completion of a specific project. A seasonal associate may work either full-time or part-time, but is not considered a “regular” associate. Employment beyond the initially stated period does not in any way imply a change in employment status. Seasonal associates retain that status unless and until they are notified of a change in writing. While Seasonal associates receive all legally mandated benefits (such as Social Security and workers' compensation insurance), they are **ineligible** for most other OPH benefit programs.

Introductory Period

At OPH we want you to be successful at your job. We have found that having an introductory period can be very helpful to new associates. The introductory period provides you with the opportunity to demonstrate that you can perform your job at a satisfactory level of performance and to determine if the new job meets your expectations. We use this period to evaluate your capabilities, work habits, and overall performance. Successful completion of the introductory period does not give rise to or create an employment contract for any period of time or a guarantee of continued employment.

The introductory period for all new and rehired associates is the first 90 calendar days after the date of hire. If you are promoted or transferred within OPH, you will be asked to complete a second introductory period of the same length when you assume the new position. If there is a significant period of absence during the introductory period, the period will automatically be extended by the length of the absence. Either during the introductory period or at the end of the period, we may extend the introductory period if we determine there was not adequate time to evaluate performance.

When the initial introductory period is satisfactorily completed, associates enter the "regular" employment classification. During the initial introductory period, new associates are eligible for legally required benefits, such as workers' compensation insurance and Social Security. After becoming regular associates, they may also be eligible for other OPH benefit programs, subject to the terms and conditions of each benefits program. Be sure to review the information for each benefit program for the exact eligibility requirements. Eligibility and employment status are not changed as the result of a secondary introductory period that results from a promotion or transfer within OPH.

Job Descriptions

OPH makes every effort to create and maintain accurate job descriptions for all positions within the organization. Each description includes sections for job information; a job summary (giving a general overview of the job's purpose); essential duties and responsibilities; supervisory responsibilities; qualifications (including education and/or experience, language skills, mathematical skills, reasoning ability, and any certification required); physical demands; and work environment.

We use the job descriptions to help new associates understand their job duties and to set standards for associate performance evaluations. Job descriptions are also used to identify the requirements of each position, establish hiring criteria, and establish a basis for making reasonable accommodations for individuals with disabilities.

The Human Resources Manager and the Department Manager prepare job descriptions when new positions are created. Existing job descriptions are also reviewed and revised in order to ensure that they are up to date. Job descriptions may also be rewritten periodically to reflect any changes in the position's duties and responsibilities. You can also be helpful by making sure that your job description accurately reflects the work you do.

We would like you to remember that job descriptions do not necessarily cover every task or duty that you might be assigned, and that additional responsibilities may be assigned as necessary. You can contact your Supervisor if you have any questions or concerns about your job description.

Personal Appearance

We want OPH associates to reflect an appropriate business image to customers and visitors. How you dress, your grooming and personal cleanliness standards, all contribute to that image and also to the morale of your co-workers.

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

Your supervisor or department head is responsible for establishing a reasonable dress code appropriate to the job you perform. If your supervisor feels your personal appearance is inappropriate, you may be asked to leave work until you can return properly dressed or groomed. If this happens, you will not be paid for the time away from work. Be sure to consult your supervisor if you have questions as to what constitutes appropriate appearance. We may, when necessary and possible, make reasonable accommodation in the personal appearance policy for a person with a disability or religious need.

Because personal style can be important to people, we do not want to restrict individual tastes unnecessarily. However, to give additional guidance, we expect OPH associates to follow the personal appearance guidelines below:

- * Shoes must provide safe, secure footing, and offer protection against hazards.
Wear footwear that is clean, in good repair and appropriate for a business environment. Flip flops and sandals are not acceptable. Stylized athletic footwear (i.e., bright multi-colored sneakers/running shoes) and sports-oriented sandals are not acceptable. **Dark, monochrome or similar athletic footwear is acceptable.**
- * Mustaches and beards must be clean, well trimmed, and neat.
- * Hairstyles are expected to be in good taste.
- * Long hairstyles should be worn with hair pulled back off the face and neck to avoid interfering with job performance.
- * Excessive makeup is not permitted.
- * Offensive body odor and poor personal hygiene is not professionally acceptable.
- * Jewelry should not be functionally restrictive, dangerous to job performance, or excessive.
- * Earrings, for both male and female, should also be tasteful and appropriate for business.
- * Facial jewelry, such as eyebrow rings, nose rings, lip rings, and tongue studs, is not professionally appropriate and must not be worn during business hours.
- * Visible excessive tattoos and similar body art must be covered as best as possible during business hours.

Salary Administration

The salary administration program at OPH was created to achieve consistent pay practices, comply with federal and state laws, mirror our commitment to Equal Employment Opportunity, and offer competitive salaries within our labor market. Because we believe that recruiting and retaining talented associates is critical to our success, we are committed to paying our associates equitable wages that reflect the requirements and responsibilities of their positions and are comparable to the pay received by similarly situated associates in other organizations in the area. Compensation for every position is determined by several factors including job analysis and evaluation, the essential duties and responsibilities of the job, and salary survey data on pay practices of other employers. We periodically review our salary administration program and restructure it as necessary. We may award merit-based pay adjustments in conjunction with superior associate performance as documented by our performance evaluation process. Incentive bonuses may be awarded depending on OPH's overall profitability and based on each associate's individual contributions to the organization.

If you have a question about the pay practices for your department, you can talk with your Supervisor. Please ask your Supervisor about wage caps for your specific position.

Performance Evaluation

The best communications about job performance happen on an informal, day-to-day basis. You and your supervisor are strongly encouraged to talk about performance regularly. Formal written performance evaluations will be conducted at the end of the initial period of hire, known as the introductory period. In addition, OPH wants to ensure that you and your supervisor have scheduled formal performance evaluations. These discussions give you both the opportunity to discuss job responsibilities and goals, encourage and recognize strengths, identify and correct any weaknesses, develop plans for dealing with any obstacles, and plan for the future. OPH awards merit-based pay adjustments in recognition of truly superior associate performance. These adjustments are based on numerous factors, including the information documented by the formal performance evaluation process. Please ask your supervisor about wage caps for your specific position.

Personal Relationships in the Workplace

The employment of relatives or individuals involved in a dating relationship in the same area of an organization may cause serious conflicts and problems with favoritism and associate morale. In addition to claims of partiality in treatment at work, personal conflicts from outside the work environment can be carried over into day-to-day working relationships.

For purposes of this policy, a relative is defined as:

- Spouse
 - Parent (Step)
 - In-Laws
 - Son/Daughter (Step)
 - Brother / Sister (Step)
 - Co-Habitation
 - Or whose relationship with you is similar to that of a relative.
- | |
|---------------|
| Uncle/Aunt |
| First Cousins |
| Niece/Nephew |
| Grandparent |
| Grandchild |

A dating relationship is defined as a relationship that may be reasonably expected to lead to the formation of a consensual "romantic" or sexual relationship. This policy applies to all associates regardless of their gender or sexual orientation. Relationships between associates, whether by birth, adoption, foster care, marriage, or cohabitation, will prevent them from being hired, promoted or transferred to:

- The same department;
- Positions in which one exerts authority over one another;
- Positions in which one has an audit and/or approval function over another; or
- Positions where a conflict of interest may occur.

OPH also may take prompt action if an actual or potential conflict of interest arises involving relatives or individuals involved in a dating relationship. If two people who are in a reporting situation described above subsequently develop a relative relationship or dating relationship, the person in the relationship who is the supervisor is responsible and obligated to immediately disclose the existence of the relationship to management. If you are in a close personal relationship with another associate, we ask that you refrain from displays of affection or excessive personal conversation at work.

Timekeeping

Nonexempt (hourly) associates are responsible for accurately recording all hours they work by clocking in and out at a designated time clock. This information also helps OPH comply with the laws that require us to keep accurate records of "time worked" in order to correctly calculate associate pay and benefits. "Time worked" is defined as all the time nonexempt staff spend performing work.

If you are a nonexempt associate, you must accurately record the time you begin and end your work, as well as the beginning and ending time of any meal periods, split shifts, or if you leave the workplace for personal reasons. Also, you always need to receive advance approval before working any overtime hours.

We consider attempts to falsify timekeeping records a very serious matter. Associates are not permitted to alter, falsify or tamper with time records, record another associate's time or let another associate record their time.

If you are a nonexempt associate, you should not start working more than **10 minutes** before your scheduled starting time. You should also not continue working more than **10 minutes** after your schedule ending time. The only time you can start earlier or work later is with prior authorization from your supervisor. You must also make every effort to clock in and out whenever necessary to ensure accurate hours worked records. If an associate fails to punch in or out, two or more times during a single pay period, the associate will be given a written warning by their supervisor. Three write-ups for this infraction will be grounds for termination for failure to follow company policy.

Work Schedules

Work schedules for associates vary throughout OPH. Your supervisor will advise you of your specific work schedule. Staffing needs and operational demands may necessitate variations in starting and ending times, as well as variations in the total hours that may be scheduled each day and week.

Overtime

There may be times when OPH cannot meet its operating requirements or other needs during regular working hours. If this happens, we may schedule associates to work overtime hours. When possible, we will try to let you know in advance of a mandatory overtime assignment. We try to distribute overtime assignments fairly among all associates who are qualified to perform the required work.

All nonexempt (hourly) associates will be paid overtime compensation in accordance with federal and state wage and hour laws. Overtime pay is based on actual hours worked. For this reason, time off for sick leave, vacation, and other paid or unpaid leaves of absence is not considered hours worked for the purpose of calculating overtime pay.

It is our policy that no overtime can be worked without the approval and authorization of the supervisor.

Attendance and Punctuality

As an associate of OPH, we expect you to be reliable and punctual by reporting for work on time and as scheduled. When you are absent or late, it places a burden on other associates and can impact productivity and service. In the rare instances when you cannot avoid being late or are unable to work as scheduled, be sure to notify your supervisor 2 hours before your shift starts or as soon as possible so that appropriate arrangements can be made.

Associates are expected to report to work on time. Because unplanned absences can be disruptive to work, excessive absenteeism and tardiness will not be tolerated.

If an associate fails to provide proper notice of absence for three (3) consecutive shifts, he will be deemed to have abandoned his job.

Personnel Data Changes

To help us keep records and benefit program information accurate, please notify OPH of any changes to your personal information. The information we need includes your mailing address, telephone numbers, your marital status, changes to your dependents' information, who to contact in case of an emergency, educational accomplishments, and other possibly relevant information. To make changes or if you have questions about what information is required, contact the Human Resources Manager.

Associates are required to report any situation or incident that may affect their employment with OPH or may have an impact on OPH's image, including but not limited to any criminal charges, whether occurring on or off duty, to the Human Resource Manager as soon as possible, and in any case no more than 3 days from the event.

Violation of Associate Discount Room Rate

Use of the Room Rate Discount is a privilege. Your conduct and professionalism (as well as those persons in your party) as a guest at a sister property is a representation of our company. Any inappropriate conduct or behavior as a guest in a participating hotel will be dealt with as misconduct in connection with the associate's employment. Any conduct or behavior deemed inappropriate by the management of the Hotel where you are a guest could result in the associate losing future room discount privileges.

Those associates who request accommodations at OPH Hotels under the Friends and Family rate plan are ultimately responsible for any damage to the property and the conduct and behavior of the Family or Friend member(s) accommodated via their request.

By requesting room discount benefits, you accept and agree to abide by the conditions outlined above.

Associate Benefits

OPH provides a wide range of benefit programs to eligible associates. Certain legally required programs (such as Social Security, workers' compensation, state disability, and unemployment insurance) cover all associates in the manner required by law.

Your eligibility for each benefit program depends on a variety of factors, including your associate classification. To better understand exactly which benefit programs you are eligible for, talk to your supervisor. You will find details about many of these programs elsewhere in the associate handbook; these details are included for illustration purposes only and are not meant to give the specific details of the benefit plans. In each case, specific provisions are set forth in the official policy or plan description. If there is any conflict between the descriptions contained in this or any other OPH publication and the official policy or plan documents, the language of the official policy or plan documents controls in every case. Associates are directed to read their policy and plan documents for detailed information.

OPH may modify or terminate any of its current benefits, insurance policies and/or contribution requirements at any time.

The following benefit programs are available to eligible associates, subject to the terms and conditions of each program:

- *Major Medical Insurance
- *AFLAC (Supplemental Insurance)
- *Life Insurance
- *Vision Care Insurance
- *Dental Insurance
- *Bereavement Pay
- *Holiday Pay
- *Paid Time Off
- *Jury Duty Leave
- *Discounted Hotel Rooms
- *Service Awards
- *Family / Medical Leave (FMLA)



While some of the benefit programs we offer may require you to contribute to the cost, many programs are fully paid by OPH.

Paid Time Off Benefits

OPH offers time off with pay to eligible associates for rest, relaxation, and personal pursuits. OPH does not differentiate between Sick Time, Vacation Days or Personal Leave. Instead, we use the Paid Time Off (PTO) accrual program. PTO can be used for any reason you wish – vacation, sick time or personal days.

Unlike most vacation time programs that renew/expire on Hire Date Anniversaries, PTO is accumulated for every hour you work or are on PTO, but not during overtime hours. The time you accumulate by working or while on PTO is held in a Bank. PTO does NOT expire and begins accruing the first day of employment.

The Associates that are eligible for the Paid Time Off benefit are:

Regular full-time and **Regular part-time** associates, that average at least 20 hours of work each week.



The terms and conditions of the Paid Time Off benefit are:

- You begin accruing PTO on your first day of employment
- The rate you accrue PTO is based on length of service (see sample schedules)
- You must regularly work at least 20 hours per week in order to accrue PTO
- You may use PTO in full or half day increments
- Once you reach the maximum PTO balance for your length of service (see charts below) you will stop accruing PTO. You must use available PTO in order to start accruing more PTO.
- For New Hires, your PTO will not be vested (payable to you upon termination) until you have been with the company for one year.
- If your employment ends before your one (1) year anniversary, you will not be eligible to receive your PTO Bank Balance.
- As a courtesy, after working for OPH for six (6) months, you may use up to sixteen (16) hours of banked PTO as a full time employee and eight (8) hours as a part time employee within your first year of employment.
- After one year, upon termination you will be paid the remaining balance of your PTO Bank up to a maximum amount which is described below.

In order to schedule time off, you must get written permission from your Supervisor at least thirty (30) days in advance. If circumstances do not allow for such advance notice, please notify your Supervisor in keeping with OPH policy and at least 2 hours prior to the start of your shift, so that coverage arrangements can be made and written authorization can be obtained. A written request for Paid Time Off must be submitted to your Supervisor within a timely manner for review and approval. If you do not receive written authorization, you will not be compensated for your time off. OPH will request a Doctor's note after 3 days of consecutive absences. PTO may be denied under certain circumstances that your Supervisor will discuss with you. Some examples of denial include, but are not limited to: wanting to use PTO for a No Show/No Call, supplementing time after reporting late for scheduled shift or submitting PTO Request for dates that were previously denied.

Accrual Rates for every hour worked or on PTO and based on length of service and employment classification. Figures are in hourly increments.

Length of Service	Full Time Accrual Rates	Part Time Accrual Rates	Salaried Associates
First day 1 through 2 years	.0269	.0192	2.152 hours per pay period
2 through 4 years	.0462	.0385	3.696 hours per pay period
5 or more years	.0654	.0577	5.232 hours per pay period

Schedule #1 - based on Regular Full Time Classification

This chart illustrates the maximum amount of Paid Time Off hours you can bank based on your years of service. It also illustrates the maximum amount of hours the company will pay out upon termination.

Length of Service	Maximum PTO Bank Balance	Maximum Hours Paid Out Upon Termination
Under 1 year	Hours are not vested until one year	0
After 1 year	64 hours	40
2 - 4 years	104 hours	80
5 years +	144 hours	120

Schedule #2 - based on Regular Part Time Classification

This sample schedule illustrates the maximum amount of Paid Time Off hours you can bank based on your years of service. It also illustrates the maximum amount of hours the company will pay out upon termination.

Length of Service	Maximum PTO Bank Balance	Maximum Hours Paid Out Upon Termination
Under 1 year	Hours are not vested until one year	0
After 1 year	24 hours	24
2 - 4 years	48 hours	48
5 years +	72 hours	72

Holidays

OPH recognizes the following holidays and pays the premium rate of one and a half your normal hourly rate for working any of these days:

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



Associates in the following employment classifications are eligible for premium holiday pay:

- * Regular full-time associates
- * Regular part-time associates
- * Introductory associates
- * Seasonal associates

Due to the cyclical nature of the hospitality industry, the Hotel must remain in operation 365 days a year and therefore time off is not guaranteed. Likewise, these holidays will NOT be paid time off.

As a courtesy, Salaried exempt associates who must work one of the above holidays may take another paid day off within 60 days from that date. This is known as a Floating Holiday.





Workers' Compensation Insurance

OPH provides a comprehensive workers' compensation insurance program to our associates. The workers' compensation program covers injuries or illnesses sustained in the course of employment. Subject to the applicable legal requirements, this program provides benefits after a short waiting period or, in the event of hospitalization, immediately.

It is critical that you inform your supervisor immediately about any work-related injury or illness, regardless of how minor it might appear at the time. Immediate reporting ensures that, if eligible, you will qualify for workers' compensation benefits as quickly as possible and also lets us investigate the matter promptly.

Workers' compensation is intended to cover only work-related injuries and illnesses. Because of this, neither OPH nor our insurance carrier will be liable for the payment of workers' compensation benefits for injuries that might occur during associates' voluntary participation in off-duty recreational, social, or athletic activities that we may sponsor.

Physician's return to work statement

In order to protect you and other associates, you must present to your supervisor a doctor's statement releasing you to return to work following an injury or illness for which you received a doctor's care or that resulted in your absence for three or more consecutive scheduled work days. This pertains to any injury or illness, not just a work related circumstance. The doctor's release must state that you are released to return to work either: (a) without limitations; or (b) with limitations, listing them specifically.

The Genetic Information Nondiscrimination Act of 2008 (GINA) prohibits employers and other entities covered by GINA Title II from requesting genetic information of an individual or family member of the individual, except as specifically allowed by this law. To comply with this law, we are asking that you NOT provide any genetic information when responding to this request for medical information.



Bereavement Leave

In the event that you need to take time off in the event of the death of an immediate family member, OPH provides bereavement leave. To request bereavement leave, see your supervisor. We grant up to 2 days of paid bereavement leave to eligible associates (those that have completed the 90 day Introductory Period) in the following employment classifications:

- * Regular full-time associates
- * Regular part-time associates

During paid bereavement leave, your pay will be calculated based on your pay rate at the time of absence, excluding any special forms of compensation, such as incentives, commissions, bonuses, or shift differentials.

We will normally grant bereavement leave unless there are unusual business needs or staffing requirements that prevent accommodating the request. You may also, with supervisory approval, use any available paid leave benefits for additional time off as necessary.

The bereavement leave policy defines "immediate family" as the associate's spouse, parent, child, step child, brother, sister, grandparent, mother or father in law.

Jury Duty

OPH encourages you to fulfill your civic responsibilities by serving jury duty when required.

Associates in an eligible classification may request up to 1 day of paid jury duty leave over any 1 year period.

If you are eligible for paid jury duty leave, you will be compensated at your base rate of pay for the number of hours you would normally have worked that day, excluding any special forms of compensation, such as incentives, commissions, bonuses, or shift differentials. Associates in the following classifications are eligible for paid jury duty leave:

- * Regular full-time associates
- * Regular part-time associates
- * Introductory associates

If you remain on jury duty beyond the period of paid jury duty leave, you may use any available paid time off or request an unpaid jury duty leave of absence. If you receive a jury duty summons, show it to your supervisor as soon as possible so that arrangements can be made to accommodate your possible absence from work. You are expected to report for work whenever the court schedule permits.

Either you or OPH may request you be excused from jury duty if necessary. We may request that you be relieved from serving on jury duty if we believe that your absence would cause serious operational difficulties for OPH.

Subject to the terms, conditions, and limitations of the applicable plans, OPH will continue to provide health insurance benefits until the end of the first full month of unpaid jury duty leave. At that time, you will become responsible for the full cost of those benefits in order for coverage to continue. When you return from unpaid jury duty leave, OPH will resume providing those benefits according to the applicable plans.

EMPLOYEE RIGHTS AND RESPONSIBILITIES UNDER THE FAMILY AND MEDICAL LEAVE ACT

Basic Leave Entitlement

FMLA requires covered employers to provide up to 12 weeks of unpaid, job-protected leave to eligible employees for the following reasons:

- For incapacity due to pregnancy, prenatal medical care or child birth;
- To care for the employee's child after birth, or placement for adoption or foster care;
- To care for the employee's spouse, son or daughter, or parent, who has a serious health condition; or
- For a serious health condition that makes the employee unable to perform the employee's job.

Military Family Leave Entitlements

Eligible employees with a spouse, son, daughter, or parent on active duty or call to active duty status in the National Guard or Reserves in support of a contingency operation may use their 12-week leave entitlement to address certain qualifying exigencies. Qualifying exigencies may include attending certain military events, arranging for alternative childcare, addressing certain financial and legal arrangements, attending certain counseling sessions, and attending post-deployment reintegration briefings.

FMLA also includes a special leave entitlement that permits eligible employees to take up to 26 weeks of leave to care for a covered service member during a single 12-month period. A covered service member is a current member of the Armed Forces, including a member of the National Guard or Reserves, who has a serious injury or illness incurred in the line of duty on active duty that may render the service member medically unfit to perform his or her duties for which the service member is undergoing medical treatment, recuperation, or therapy; or is in outpatient status; or is on the temporary disability retired list.

Benefits and Protections

During FMLA leave, the employer must maintain the employee's health coverage under any "group health plan" on the same terms as if the employee had continued to work. Upon return from FMLA leave, most employees must be restored to their original or equivalent positions with equivalent pay, benefits, and other employment terms.

Use of FMLA leave cannot result in the loss of any employment benefit that accrued prior to the start of an employee's leave.

Eligibility Requirements

Employees are eligible if they have worked for a covered employer for at least one year, for 1,250 hours over the previous 12 months, and if at least 50 employees are employed by the employer within 75 miles.

Definition of Serious Health Condition

A serious health condition is an illness, injury, impairment, or physical or mental condition that involves either an overnight stay in a medical care facility, or continuing treatment by a health care provider for a condition that either prevents the employee from performing the functions of the employee's job, or prevents the qualified family member from participating in school or other daily activities.

Subject to certain conditions, the continuing treatment requirement may be met by a period of incapacity of more than 3 consecutive calendar days combined with at least two visits to a health care provider or one visit and a regimen of continuing treatment, or incapacity due to pregnancy, or incapacity due to a chronic condition. Other conditions may meet the definition of continuing treatment.

Use of Leave

An employee does not need to use this leave entitlement in one block. Leave can be taken intermittently or on a reduced leave schedule when medically necessary. Employees must make reasonable efforts to schedule leave for planned medical treatment so as not to unduly disrupt the employer's operations. Leave due to qualifying exigencies may also be taken on an intermittent basis.

Substitution of Paid Leave for Unpaid Leave

Employees may choose or employers may require use of accrued paid leave while taking FMLA leave. In order to use paid leave for FMLA leave, employees must comply with the employer's normal paid leave policies.

Employee Responsibilities

Employees must provide 30 days advance notice of the need to take FMLA leave when the need is foreseeable. When 30 days notice is not possible, the employee must provide notice as soon as practicable and generally must comply with an employer's normal call-in procedures.

Employees must provide sufficient information for the employer to determine if the leave may qualify for FMLA protection and the anticipated timing and duration of the leave. Sufficient information may include that the employee is unable to perform job functions, the family member is unable to perform daily activities, the need for hospitalization or continuing treatment by a health care provider, or circumstances supporting the need for military family leave. Employees also must inform the employer if the requested leave is for a reason for which FMLA leave was previously taken or certified. Employees also may be required to provide a certification and periodic recertification supporting the need for leave.

Employer Responsibilities

Covered employers must inform employees requesting leave whether they are eligible under FMLA. If they are, the notice must specify any additional information required as well as the employees' rights and responsibilities. If they are not eligible, the employer must provide a reason for the ineligibility.

Covered employers must inform employees if leave will be designated as FMLA-protected and the amount of leave counted against the employee's leave entitlement. If the employer determines that the leave is not FMLA-protected, the employer must notify the employee.

Unlawful Acts by Employers

FMLA makes it unlawful for any employer to:

- Interfere with, restrain, or deny the exercise of any right provided under FMLA;
- Discharge or discriminate against any person for opposing any practice made unlawful by FMLA or for involvement in any proceeding under or relating to FMLA.

Enforcement

An employee may file a complaint with the U.S. Department of Labor or may bring a private lawsuit against an employer.

FMLA does not affect any Federal or State law prohibiting discrimination, or supersede any State or local law or collective bargaining agreement which provides greater family or medical leave rights.

FMLA section 109 (29 U.S.C. § 2619) requires FMLA covered employers to post the text of this notice. Regulations 29 C.F.R. § 825.300(a) may require additional disclosures.

Excerpts from: WHD Publication 1420 Revised January 2009

For revisions and the latest benefit information, please be sure to log onto

www.wagehour.dol.gov

Or call 1-866-4us-wage (1-866-487-9243) for TTY 1-877-889-5627

Health Insurance

The health insurance plan at OPH offers associates and their dependents access to medical, dental, and vision care insurance benefits. Associates in the following employment classifications are eligible to participate in the health insurance plan:

- * Regular full-time associates

Eligible associates may participate in the health insurance plan subject to the terms and conditions of the agreement between OPH and the insurance carrier.

If you change to an employment classification that would cause you to lose your health insurance plan eligibility, you may qualify to continue your health care benefits under the Consolidated Omnibus Budget Reconciliation Act (COBRA). Refer to the Benefits Continuation (COBRA) Policy in this handbook for more information.

All insurance coverage will terminate on the last day of the month of your termination of employment with the Hotel. Therefore, you will be responsible for payment of the remaining weekly premiums until the last day of the month. At which time if there are monies owed that cost will be deducted from your final paycheck. For questions about health insurance, contact the Human Resources Manager for additional information.

Benefits Continuation (COBRA)

The federal Consolidated Omnibus Budget Reconciliation Act (COBRA) gives associates and their qualified beneficiaries the opportunity to continue health insurance coverage under our health plan when a "qualifying event" occurs that would normally result in the loss of eligibility. "Qualifying events" include resignation, termination of employment, or death of an associate; a reduction in an associate's hours; associate's leave of absence; associate's divorce or legal separation; and when a dependent child no longer meets the eligibility requirements as a dependent.

Under COBRA, the associate or beneficiary pays the full cost of coverage at OPH's group rates plus an administration fee. When you become eligible for COBRA, an outsourced company will give you a written notice describing the rights granted under COBRA. Because the COBRA notice contains important information about your rights and your obligations, please read it carefully.

Pay Advances

In the event of a personal emergency, OPH will consider an associate's request for a pay advance for associates who have completed their introductory period. We will consider each request individually, but do not guarantee that it will be granted. To request a pay advance, submit a written request explaining the emergency to your supervisor. Individual associates are limited to two (2) loans per calendar year. The balance will be repaid by a payroll deduction over a period not to exceed eight (8) weeks. If someone leaves our employ, the entire loan balance or prepay owed will be deducted from the final check. At the time a loan is issued, the associate will authorize all payroll deductions and will agree to repayment terms should the associate owe more money than is due in the final paycheck.

Payday, Pay Deductions and Garnishment

OPH's workweek begins on Sunday and ends on Saturday. Every other Thursday is payday. Any changes due to holidays or other events that may interfere with this pay schedule will be announced in advance.

OPH is legally required to make certain deductions from every associate's compensation. Among these deductions are federal, state, and local taxes as appropriate. We are also legally required to deduct Social Security taxes on your earnings up to a maximum amount, which is called the Social Security "wage base." OPH contributes to your Social Security by matching the amount of Social Security taxes deducted from your compensation. OPH offers programs and benefits to eligible associates beyond those required by law. You may voluntarily authorize deductions from your paycheck to cover your portion of the cost of these programs. OPH offers a Christmas Club which can be used to set aside a predetermined portion

from each paycheck beginning in January. The checks will be distributed in November, before Thanksgiving. The money is held in an account and a separate check will be issued to you for the full amount that was withheld.

We may find it necessary to take "pay garnishments" from your paycheck. Pay Garnishments are pay deductions taken out of your paycheck, usually to help pay off a third party debt or obligation, such as Child Support or Student Loans.

Associates must verify that their paychecks are correct every payday; any problems should be directed immediately to the Human Resource Manager for resolution. Periodically, associates should also verify that the personal information on their paychecks is correct. Any changes that need to be made must be immediately communicated to the Human Resource Manager so that the proper information can be forwarded to payroll.

All deductions from an associate's pay shall be in keeping with the requirements of the FLSA. If you have questions concerning why a deduction was made from your paycheck or how your paycheck is calculated, consult with your supervisor.

Return of Company Property

As part of your job, you may be issued or given temporary possession of OPH property, materials or written information. You are expected to be responsible for and maintain control of any OPH property in your possession. If your employment ends, all OPH property must be returned on or before your last day of work. In situations where you do not return OPH property, we may take steps to recover the item or its cost by withholding from your regular or final paycheck when allowed by law, or by taking legal action.

Security Inspections and Procedures

OPH is committed to maintaining a work environment that is free of illegal drugs, alcohol, explosives, or other improper or harmful materials. We prohibit the possession, transfer, sale, or use of such materials on our premises. To ensure this policy is successful, we need every associate's cooperation.

We may provide you with desks, lockers, and other storage devices for your convenience but these are always the sole property of OPH. Because they are OPH's property, we may inspect them along with any items that are inside them. Agents or persons we authorize, either with or without prior notice to you, may make an inspection at any time.

We also want to discourage theft and the unauthorized possession of property that belongs to our associates, OPH, visitors, and guests. An associate's personal property, including but not limited to tool boxes, packages, purses, backpacks and vehicles, may be inspected at any time upon reasonable suspicion of possessing illegal drugs, guest or coworker belongings or OPH property. If you wish to avoid having your belongings inspected, the best thing is to not bring them to work.

If an associate becomes aware of any theft, misuse or unauthorized removal of OPH property, he is directed to notify a **Manager** immediately.

Weapons - Guns and other types of weapons are NOT permitted in the Hotels. OPH complies with Federal, State and Local laws and respects your right to own and carry such weapons. However, it is against our safety policy to bring such items beyond the parking lot area. Please see your supervisor with questions.

Associate Parking - In order to provide convenient access to our Hotels for our guests, associates are assigned to the parking areas away from the hotel entrances. You will be issued a parking decal and will be shown the proper area for your vehicle to be parked. If accommodation needs to be made due to a disability, please see the Human Resource Manager or the Head of Security for details.

Personnel Files - In order to maintain associate privacy, records may be examined in accordance with the following standards:

Examination of Personnel Files -

1. An associate's personnel file may be examined only by the associate or appropriate upper management members.
2. Records may be examined only in the Human Resources office and in the presence of a designated company representative.
3. No record may be removed from the Human Resources office, even temporarily.
4. **All documentation remains the sole property of Ocean Partners Hospitality LLLP.** No copies of personnel documents are permitted. This includes, but is not limited to, Performance Reviews, Commitments To Correct, Change of Status forms, or training materials.

NOTE: The federal Occupational Safety and Health Act (OSHA) does entitle associates who are exposed to toxic substances or harmful physical agents access to certain medical and related records.

Safety

To assist in providing a safe and healthful work environment for associates, customers, and visitors, OPH has established a workplace safety program. This program is a top priority at OPH. The success of the program depends on the alertness and personal commitment of everyone.

We provide information to associates about workplace safety and health issues through regular internal communication channels. These may include supervisor-associate meetings, bulletin board postings, memos, Safety Data Sheets or other written communications. Associates and supervisors receive periodic workplace safety training. The training covers potential safety and health hazards as well as safe work practices and procedures to eliminate or minimize hazards. We also have a **Safety Committee** that assists in these activities and helps facilitate effective communication between associates and management about workplace safety and health issues.

Some of the best safety improvement ideas come from associates. If you have an idea, concern, or suggestion for how to improve safety in the workplace, we encourage you to tell your supervisor, another supervisor, or a member of the Safety Committee. We want you to be assured that you can report any concerns about workplace safety anonymously if you wish and you can make a report without fear of reprisal.

You are expected to obey all safety rules and use caution in your work activities. You must immediately report any unsafe, hazardous or dangerous situations or working conditions to the appropriate supervisor.

In the case of an accident that results in an injury, regardless of how insignificant the injury may appear, you should **immediately notify** the appropriate supervisor. Prompt reporting can ensure legal compliance and quick initiation of insurance and worker's compensation benefits procedures.

Workplace Monitoring

OPH may provide equipment, computers, printers, telephones and other electronic and mobile devices (hereinafter collectively referred to as "devices") to its associates to perform their job functions. These devices and all related materials, including the OPH's Network and software, are OPH property and may be used for OPH business only. Associates should not have an expectation of privacy in anything they create, store, send, or receive on or using OPH's electrical/electronic devices. Only software that is authorized by OPH may be used, copied or installed on Company devices. All data contained on OPH's devices belongs to the Company and may not be altered without specific written authorization from the General Manager. No data stored on OPH's devices may be released to any person or outside organization.

Associates who access OPH's Network or electronic files from remote locations are governed by the terms of this Policy and may not download OPH's electronic files to their own personal devices or other remote locations without proper authorization. Associates who are authorized to work on OPH business either from home or remote locations must virus check any CD's, external drives or other media storage devices before using them on OPH's devices and/or Network.

All computer-related passwords must be disclosed to your supervisor or they are invalid and may not be used. Computer-related passwords and security codes assigned to associates may not be communicated to any other associate or third party unless specifically authorized by the General Manager. Associates may not retrieve or read any electronic messages that are not sent to them. Any exception to this Policy must receive prior approval from the General Manager.

OPH may conduct workplace monitoring to help ensure quality control, associate safety, security, and customer satisfaction. -Associates who regularly communicate with customers may have their devices or telephone conversations monitored or recorded. We use monitoring to identify and correct performance problems with targeted training. We are always striving for improved performance to enhance our customers' image of OPH as well as customer service satisfaction.

OPH devices and systems, Internet access, as well as company provided or reimbursed for cell phones that associates may use, are always the property of OPH. Therefore, we may monitor computer and phone activities-including Text Messages. We also may retrieve and read any files or data that are composed, sent, or received through Company devices, Internet connections, the Company's e-mail domain or Network or stored in our computer systems; the confidentiality of any electronic message should not be assumed. OPH's devices and/or services may not be used to solicit or create any offensive or disruptive messages. OPH devices and/or services shall not be used to send (upload) or receive (download) copyrighted materials, trade secrets, proprietary information, financial data or similar materials. All messages composed, sent or received on the Company's devices are and remain the property of OPH; they are not the private property of any associate.

We may conduct video surveillance of non-private workplace areas. We use video monitoring to identify safety concerns, maintain quality control, detect theft and misconduct, and discourage and prevent acts of harassment and workplace violence.

You may request access to information gathered through workplace monitoring that may impact employment or disciplinary decisions. We will grant access unless there is an ongoing investigation or a legitimate business reason to protect confidentiality.

Because we are sensitive to the legitimate privacy rights of our associates, we will make every effort to guarantee that workplace monitoring is always done in an ethical and respectful manner.

Social Media Policy

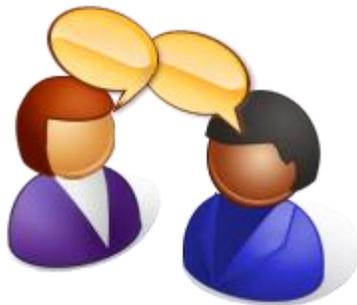
Personal Web sites and Web logs (“blogs”) have become prevalent methods of self-expression in our culture. OPH respects the right of associates to use these mediums during their personal non-work time using their personal, non-work equipment. This policy applies to all associates who make web postings that affect the Company, its associates, or affiliates, including competitors. Associates that make web postings anonymously must also comply with this policy.

For the purposes of this policy, Web postings include, but are not limited to, personal web sites, blogs, multi-media and social networking sites such as Facebook, You Tube, Twitter; as well as Wikis such as Wikipedia and other text posting sites. The following expectations do not seek to unduly interfere with associate’s personal non-working activities, but certain limits and reminders are required to protect both the associate and OPH.

Expectations:

- Associates are personally responsible for their web postings and solely liable for web postings found to be defamatory, harassing, an invasion of privacy, or in violation of any other applicable federal or state law.
- Associates are solely responsible for any and all liability and consequences that result from their personal postings.
- Associates are prohibited from using work time, OPH devices, equipment, software or systems for personal posting activities or accessing social media sites.
- Unless you have written prior authorization from the ownership, associates are not permitted to post items on behalf of, or as an official representative of, OPH.
- Associate postings may not include any Company logos or trademarks, and should respect and comply with all copyright, privacy, fair use, financial disclosure, and other applicable federal, state and local laws.

The above policy should not be interpreted to restrict or interfere with any associate’s federal or state labor law rights, free speech, or any whistleblower protections under federal or state law.



Use of Company Equipment and Vehicles

Equipment (i.e. radios, ear pieces and company cell phones) and vehicles (i.e. golf carts) essential in accomplishing job duties are expensive and may be difficult to replace. When using OPH property, you are expected to exercise care, perform required maintenance, and follow all operating instructions, safety standards, and guidelines.

You should notify your supervisor if any equipment, machines, tools, or vehicles 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 associates or other people. Your supervisor can answer any questions about your responsibility for maintenance and care of equipment or vehicles you use on the job.

The improper, careless, negligent, destructive, or unsafe use or operation of Company equipment or vehicles will not be tolerated and associates may be held responsible for any associated costs and/or damage.



Emergency Closings

There could be times when emergencies, such as severe weather, fires or power failures may disrupt our normal business operations. In extreme cases, these circumstances may require that we close a work facility. Should an emergency situation occur, usually local radio and/or television stations will be asked to announce that we are closed. We also have the Department Manager call their off duty staff members to inform them of the closing. Because we will need all available staff to assist with guests and securing the property, it is of the utmost importance you are familiar with all Emergency Procedures.

Due to the specific nature of the Hospitality industry, many people depend on our safe and knowledgeable responses to difficult situations. Be sure to go over the Emergency Procedures policy with your Supervisor and familiarize yourself with the procedures specific to your department and position.

When a facility is **officially closed** due to emergency conditions up to and including evacuation, the time off from scheduled work will be unpaid. However, you may request to use your available paid time off. All leave approval and use of paid time off is left to the discretion of the General Manager.

If OPH is **not officially closed** during an emergency, you are expected to report to work. If you do not report to work, you will not be paid for the time off. Your absence may be unexcused if you do not follow the normal call in procedures. Again, it is important that you review the Emergency Procedures and call in policy with your Supervisor.

No Solicitation Policy

OPH feels very strongly that work time is for work. Therefore, the conducting, by any associate, of non-company business, such as canvassing, collection of funds, pledges, solicitation of memberships, distribution of non-hotel literature, such as leaflets or other written materials, or other similar types of activities will not be permitted during working time. You may post any flyers, leaflets, etc on the associate bulletin boards or in associate break areas, but not during work time.

Bulletin Boards

Announcements of upcoming events and information of interest are posted on bulletin boards usually located by time clocks. All notices must be pre-approved by the General Manager prior to being posted. Make it a habit to read the bulletin boards regularly and stay informed!

Call In Pay

Sometimes it is necessary to call an associate into work even though they are not scheduled. Should this happen, an associate is expected to follow all Company policies including dress code and clock in and out procedures. It is your responsibility to clock in and out, but if you are not able to, please give your supervisor the correct times you were on property working.

Associates who are called in to work when not scheduled are guaranteed 4 hours of pay (at their normal base rate) as compensation for reporting to work. If the associate does not need to stay for the entire 4 hours, you will be paid for the hours worked and then the balance owed to equal 4 hours. The time paid that is not hours worked, will be paid at the normal hourly rate (not overtime or holiday as it was not Hours Worked). However, if an associate volunteers or requests to leave prior to the end of the scheduled call-in shift, the associate will be paid only for the time actually worked.

Lost and Found

Lost and Found is located in the Housekeeping Department. If you find any items in the Hotel which are not Hotel property, you must turn them into lost and found as quickly as possible. All unclaimed articles will be returned to the finder after a reasonable amount of time has passed and no one claims the article. The Hotel is not responsible for personal property if it is lost or stolen. Associates are urged to lock all items either in their assigned lockers or in the vehicles.

Use of Guest Facilities

No associate is allowed on a guest floor, in a guest room, on guest elevators, in public areas, restrooms, or ANY guest facility unless on a specific work assignment. If you desire to visit one of the areas, permission must be obtained from the General Manager (GM) in advance. The proper conduct and dress code must be adhered to while using the guest facility. Associates are not authorized to visit Hotel property during Off-Duty hours for any reason without the express consent of the GM or Manager on Duty.

Smoking

In keeping with Florida Clean Air Act and OPH's intent to provide a safe and healthful work environment, smoking in the workplace is discouraged and no person may smoke in any indoor areas of the Hotel. Nonsmoking areas are clearly designated where smoking is expressly prohibited, and associates are asked to respect these designations. In situations where the preferences of smokers and nonsmokers conflict, the preferences of the nonsmokers will prevail.

"Smoke Breaks" are NOT separate from normal break and/or meal times, smokers should not expect EXTRA rest periods for "Smoke Breaks" during their shift. Please be aware that any rest periods you take, are subject to the approval of management and are not a guarantee. See **Rest and Meal Breaks** for more details.

Rest and Meal Breaks

Rest and Meal Breaks are not mandated by law. However, all full-time regular associates are normally provided with one meal period of at least 30 minutes in length when scheduled for 6 or more hours per shift. Supervisors will schedule meal periods to accommodate operating requirements. During meal periods, you will be relieved of all work responsibilities and restrictions and will not be compensated for that time. Therefore, it is important to clock out and back in during these 30 minute periods.

All rest breaks are generally 15 minutes or less subject to the approval of management and are not guaranteed. Rest breaks should be timed so that workflow is not interrupted. Associates are compensated for rest breaks lasting twenty (20) minutes or less.

"Smoke Breaks" are NOT separate from normal break and/or meal times, smokers should not expect EXTRA rest periods for "Smoke Breaks" during their shift.

Due to the unpredictable nature of the Hospitality industry, there are certain positions and/or departments that remain On Call throughout their shift. Therefore, these associates do not need to clock out for lunch breaks because they are expected to remain close to their work stations and be available to the guests at all times. The Department Manager will inform you of such unique circumstances or if your position is one this situation may apply to. You may also see your Human Resource Manager with any questions.

Break Time for Nursing Mothers

OPH will provide reasonable break time for an associate to express breast milk for her nursing child for one(1) year after the child's birth each time such associate has need to express the milk. OPH will provide a place, other than a bathroom, that is shielded from view and free from intrusion from coworkers and the public, which may be used by our associate to express breast milk.

An associate that needs to take a break to express breast milk is compensated if the break is less than twenty (20) minutes. However; like meal breaks, any break exceeding twenty (20) minutes is unpaid (and the associate must clock out) and should be at least thirty (30) minutes.

Drug and Alcohol Use

OPH provides a drug-free, healthful, and safe workplace. To meet this goal, we expect you to report to work in a mental and physical condition that enables you to perform your job in a satisfactory manner.

Substance abuse, which includes the possession, use or sale of illegal drugs or the unlawful use or misuse of lawful substances, including alcohol and prescription drugs, will not be tolerated. OPH also prohibits the illicit use, possession, sale, attempted sale, purchase, attempted purchase, conveyance, distribution, cultivation or manufacture of illegal drugs, intoxicants, or controlled substances in any amount or in any manner.

We permit the legal use of prescribed drugs on the job only if they do not impair your ability to perform the essential functions of your job effectively and safely without endangering others.

To help associates understand the important provisions of this policy, we have established a drug-free awareness program. The program provides information on the dangers and effects of substance abuse in the workplace, the resources available, and the consequences of violating this policy. This information is contained in the Drug-Free Workplace Policy Manual you receive during the hiring process. It is a condition of employment at OPH to refrain from using illegal drugs and unlawfully using lawful substances, including alcohol and prescription medicines, and to abide by the guidelines of the Drug-Free Workplace Policy Manual.

If you have questions about substance dependency or abuse, we strongly encourage you to use the resources of the Associate Assistance Program. You may also wish to discuss these matters with the Human Resources Manager to receive assistance or referrals to appropriate community resources.

If you have questions about this policy or issues related to drug or alcohol use at work, you can raise your concerns with the Human Resources Manager without fear of reprisal.

Harassment

OPH is committed to providing a work environment that is free from all forms of discrimination and conduct that can be considered harassing, coercive, or disruptive, including sexual harassment. Actions, words, jokes, slurs, comments, or other verbal, graphic, or physical conduct based on an individual's sex, race, color, national origin, age, religion, disability, or any other legally protected status will not be tolerated. We provide ongoing harassment training to ensure you the opportunity to work in an environment free of sexual and other unlawful harassment.

Harassment based on an individual's sex, race, color, national origin, age, religion, disability or any other legally protected status is defined as conduct which has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment. Examples of behavior which could be construed as harassment include, but are not limited to, the following:

- Degrading any group or class of people;
- Assigning less desirable work or working conditions to members of such protected groups based solely on their group membership; or,
- Treating protected individuals in a demeaning fashion.

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

- Unwanted sexual advances.
- Offering employment benefits in exchange for sexual favors.
- Making or threatening reprisals after a negative response to sexual advances.
- Visual conduct that includes leering, making sexual gestures, or displaying of sexually suggestive objects or pictures, cartoons or posters.
- Verbal conduct that includes making or using derogatory comments, epithets, slurs, or jokes.
- Verbal sexual advances or propositions.
- Verbal abuse of a sexual nature, graphic verbal commentaries about an individual's body, sexually degrading words used to describe an individual, or suggestive or obscene letters, notes, emails, text messages or invitations.
- Physical conduct that includes touching, assaulting, or impeding or blocking movements. Explicit or implicit threats to withhold pay increases, benefits or working conditions in exchange for sexual favors or sexual activity.
- Promises to improve pay, benefits or working conditions in exchange for sexual favors or sexual activity.

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

If you experience or witness sexual or other unlawful harassment in the workplace, report it immediately to the Human Resource Manager. If the Human Resources Manager is unavailable or you believe it would be inappropriate to contact that person, you should immediately contact the General Manager. All allegations of harassment will be quickly and discreetly investigated. Associates are required to participate in all OPH investigations. To the extent possible, your confidentiality and that of any witnesses and the alleged harasser will be protected against unnecessary disclosure. When the investigation is completed, you will be informed of the outcome of the investigation.

Associates have a duty to report any harassment they either experience or observe, regardless of whether the alleged harassment is being perpetrated by an OPH associate or any other third party. Under no circumstances will a person be retaliated against because of a bona fide report of harassing conduct.

Any supervisor or manager who becomes aware of possible sexual or other unlawful harassment must immediately advise the Human Resources Manager so it can be investigated in a timely and confidential manner.

Problem Resolution

OPH is committed to providing the best possible working conditions for our associates. Part of this commitment is encouraging an open and frank atmosphere in which any problem, complaint, suggestion, or question receives a timely response from OPH supervisors and management. OPH strives to ensure fair and honest treatment of all associates. We expect supervisors, managers, and associates to treat each other with mutual respect. We encourage associates to offer positive and constructive criticism to each other.

If you disagree with established rules of conduct, policies, or practices, you are encouraged to express your concern if you so choose. You will not be penalized, formally or informally, for voicing a complaint with OPH.

If a situation occurs when you believe that a condition of employment, working relationship or a decision affecting you is unjust or inequitable, you are encouraged to make use of the following steps. You may discontinue the procedure at any step.

- Your supervisor has a responsibility to both you and OPH to resolve problems as they arise; however, without your help, your supervisor may not be aware that a problem exists. If your supervisor is unavailable or you believe it would be inappropriate to discuss the problem with your supervisor, you may present the problem to the Department Manager, Human Resources Manager or any other member of management.
- They will then investigate the matter and respond to you promptly.
- If you still feel the matter is unresolved, you may obtain a complete review of the matter with the General Manager (GM). The GM will review the matter with you and discuss a resolution.

Only through understanding and discussion of mutual problems can associates and management develop confidence in each other. This confidence is important to the operation of an efficient and harmonious work environment, and helps to ensure everyone's job security.

Recycling

We have special recycling receptacles set up at OPH to promote the separation and collection of the following recyclable materials:

- * computer paper
- * white high grade or bond paper
- * mixed or colored paper
- * newspaper
- * corrugated cardboard
- * aluminum
- * glass
- * plastics



The simple act of placing a piece of paper, can, or bottle in a recycling container is the first step in reducing demand on the earth's limited resources. Success of this program depends on active participation by all of us. We encourage you to make a commitment to recycle and be a part of this solution.

OPH encourages reducing and eliminating the use of disposable products whenever possible. The following are some ways that you can help to decrease the consumption of valuable resources:

- * communication through computer networks via email
- * two-sided photocopying
- * minimum packaging
- * reusing paper clips, folders, and binders
- * reusing packaging material
- * turning off lights when not in use
- * use of non-disposable cups whenever possible



When we recycle, we are helping to reduce the trash disposal and control problems facing all of us. If you have any questions, ideas or suggestions for the recycling program, contact your Department Manager.

Employment Termination

While we hope that you are a successful member of the OPH family for a long time, we do realize that people move on from their positions all the time and termination of employment is an inevitable part of personnel activity within any organization. Many of the reasons for termination are routine. These are some of the most common circumstances for employment terminations:

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

We will generally schedule an exit interview at the time of employment termination. The exit interview is an opportunity to discuss such issues as associate benefits, conversion privileges, repayment of any outstanding debt to OPH, and return of OPH-owned property. It is also a time for you to voice any suggestions, complaints, and questions you may have.

Since employment with OPH is based on mutual consent, either you or OPH have the right to terminate the employment relationship at will, with or without cause or advance notice, at any time.

Your benefits are affected by termination in several ways. All accrued and/or vested benefits that are due and payable at termination will be paid out during the company's next payroll check run cycle. Some benefits may be continued at your expense if you choose. You will be notified in writing of the benefits that may be continued and of the terms, conditions, and limitations for continuing them.

Reference Requests

The company's reference policy is to disclose only the dates of employment and the title of the last position held. Associates should not, under any circumstances, respond to any requests for information regarding another associate. Please direct all inquiries to the Human Resource office.



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Receipt of Associate Handbook Acknowledgement Form

The Associate Handbook describes important information about Ocean Partners Hospitality LLLP (OPH) and I understand that I should consult the Human Resources Manager or my Supervisor regarding any questions not answered in the handbook.

I have entered into my employment relationship with OPH voluntarily and acknowledge that there is no specified length of employment. Accordingly, either OPH or I may terminate the employment relationship at will at any time, with or without cause, so long as there is no violation of applicable federal or state law.

I understand that I am expected to follow the policies and procedures outlined in this Handbook. I also understand that any violation of these or any other OPH policy, practice or procedure will subject me to disciplinary action, up to and including separation.

Since the information, policies, and benefits described in the Handbook are subject to change as needed, I acknowledge that revisions to the Handbook may occur, except to the employment-at-will policy of OPH. All such changes will be communicated through official notices, and I understand that revised information may supersede, modify, or eliminate existing policies. I also understand that only the General Manger of OPH has the ability to adopt revisions to the policies in this handbook.

Furthermore, I acknowledge that this Handbook is neither a contract of employment nor a legal document. I have received the Handbook, and I understand that it is my responsibility to read and comply with the policies contained in this Handbook and any revisions made to it.

If I have any questions regarding the content or interpretation of this Handbook, I will bring them to the immediate attention of the Human Resources Manager.

ASSOCIATE'S NAME (printed): _____

ASSOCIATE'S SIGNATURE: _____

DATE: _____