

2025

Policies & Procedures Manual



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01 | INTRODUCTION

1.1 Overview

Odyssey Real Estate Services, LLC (“ORES” “Odyssey Realty” or the “Firm”) is an independently-owned, full-service, value-driven real estate Brokerage, licensed and operating in the State of Florida. ORES is a member of the Osceola County Association of Realtors (OSCAR), Florida Realtors, and the National Association of Realtors (NAR).

Our registered address is: **1101 Miranda Lane, Kissimmee, FL 34741**

Our main phone number is: **321.529.2700**

The Owner/Broker is: **Leo Pacheco, Licensed Real Estate Broker**

Our License # is **CQ1071299**

1.2 Odyssey Definition

The term “Odyssey” is defined as *“a daring adventure of discovery, growth, and transformation.”* Odyssey represents an unfolding story where each step is an opportunity to redefine possibilities, push boundaries, and explore uncharted territories. In the realm of real estate, “Odyssey” embodies the bold pursuit of personal and professional mastery, where every challenge is a chance to carve out a unique path and every success is a testament to the power of vision and resilience. It’s not just about the destination; it’s about the journey that redefines who you are along the way. At Odyssey, we help you find your way home.

1.3 Mission Statement

At Odyssey Real Estate Services, our mission is to deliver an exceptional real estate experience through professionalism, expert guidance, world-class training, and unmatched value.

1.4 Vision Statement

To be the premier real estate service provider, recognized for redefining excellence through innovation, expertise, and empowerment—transforming lives, inspiring growth, and creating lasting value in every journey we guide.

1.5 Core Values | Our Values are Our C.O.M.P.A.S.S.

Commitment | Dedicated to delivering exceptional service and building lasting relationships.

Opportunity | Creating pathways for growth, transformation, and success.

Mastery | Striving for excellence through continuous learning, training, and expertise.

Professionalism | Upholding integrity, accountability, and respect in every interaction.

Adaptability | Embracing innovation and navigating change with resilience and creativity.

Service | Providing value-driven solutions that inspire and empower others.

Support | Fostering collaboration, encouragement, and guidance to achieve shared goals.

1.6 Purpose

General Purpose. This Policy and Procedure Manual is designed to establish a consistent framework for daily interactions and conduct among employees, independent contractors, and all stakeholders, including colleagues, clients, customers, and the general public. The goal is to ensure clear and respectful communication and behavior across all levels of the Firm and in all professional dealings.

Responsibilities. All employees and independent contractors are required to adhere to the Firm's policies and procedures outlined in this manual. Non-compliance may result in disciplinary action, up to and including termination of employment or termination of contractual agreements.

Amendments to the Manual. The Firm reserves the right to modify this manual at any time, with or without prior notice. When updates occur, the revised manual will be accessible on the Firm's intranet to ensure easy access for all employees and contractors.

Conflict Between Independent Contractor Agreement and Policy Manual. In the event of a conflict between the provisions of this manual and the terms of any Independent Contractor Agreement, the terms outlined in this Policy and Procedure Manual shall take precedence.

02 | EMPLOYMENT POLICIES FOR ALL EMPLOYEES AND CONTRACTORS

2.1 Equal Employment Opportunity (EEO)

The Firm is committed to providing equal employment opportunities to all individuals, regardless of race, color, religion, sex, gender, sexual orientation, national origin, age, disability, veteran status, or any other legally protected characteristic under applicable law. We strive to maintain a work environment free of discrimination and harassment. All decisions regarding hiring, promotion, discipline, and other employment matters will be based on individual qualifications, business needs, and performance.

If any employee or contractor believes they have been subject to discrimination or unequal treatment, they are encouraged to report the incident to Broker/Owner. The firm will promptly investigate all complaints and take appropriate corrective action, ensuring no retaliation occurs.

2.2 Americans with Disabilities Act (ADA)

We are dedicated to providing equal opportunities for individuals with disabilities in compliance with the Americans with Disabilities Act (ADA). This means ensuring reasonable accommodations are made for qualified employees or contractors who may have physical or mental disabilities. Examples of accommodations may include reasonably modifying workspaces, adjusting schedules, or providing specialized equipment to assist with job duties if or when an employee or contractor is working in an office provided by the firm.

Employees and contractors seeking accommodations should submit a written request to the Broker or designated representative. All requests will be confidentially evaluated, and appropriate adjustments will be made unless they would cause undue hardship to the Firm.

2.3 Anti-Harassment and Non-Discrimination

Odyssey Real Estate Services, LLC has a zero-tolerance policy for any form of harassment or discrimination. Harassment is any unwelcome behavior—whether verbal, physical, or visual—that creates an intimidating, hostile, or offensive work environment. Discriminatory behavior includes treating someone unfavorably because of race, gender, age, sexual orientation, religion, disability, or any other protected characteristic.

Examples of harassment include, but are not limited to:

- Derogatory comments, innuendo, or jokes
- Unwanted physical contact or advances
- Display of offensive images or materials

Employees and contractors are expected to report incidents of harassment immediately to their supervisor or Broker. All complaints will be investigated promptly and thoroughly.

Appropriate action will be taken in response to any findings of harassment or discrimination, which may include suspension or termination.

2.4 Employment Classifications

Employees and contractors are classified for the purposes of compensation, benefits, and legal compliance. The classifications include:

- **Full-Time Employees:** Regularly scheduled to work 32 or more hours per week.
- **Part-Time Employees:** Regularly scheduled to work fewer than 32 hours per week.
- **Temporary Employees:** Hired for a defined time period or project.
- **Independent Contractors:** Individuals who are not classified under the Labor Department's definition of "employee," but are employed by the Firm to perform specific services under a contractual agreement. They are not entitled to certain employment benefits and are responsible for their own tax liabilities and business expenses.

The classification determines eligibility for benefits and compensation and is assigned based on business needs and applicable laws.

2.5 Background Checks

To ensure a safe and secure workplace, Odyssey may perform background checks on new employees and contractors. These checks may include, but are not limited to, verification of educational credentials, employment history, criminal background, and other relevant details, as allowed by law. Background checks will be conducted in accordance with federal, state, and local regulations.

A satisfactory background check is a condition of employment or engagement with the firm. Any findings that could affect job performance, compliance with regulatory requirements, or company reputation may result in disqualification for the position or contract.

2.6 Conflicts of Interest

All employees and independent contractors are expected to act in the best interests of Odyssey Real Estate Services, LLC and avoid situations that could result in conflicts of interest. A conflict of interest arises when personal interests might interfere with the employee's ability to perform their duties objectively.

Examples of potential conflicts include:

- Financial interests in competing businesses
- Personal relationships that could influence decision-making
- Outside employment that affects job performance

Any potential conflict of interest must be disclosed to the Broker immediately. Odyssey will assess the situation and, if necessary, take action to mitigate the conflict. Employees and contractors are prohibited from using their position for personal gain or illegal influence.

2.7 Confidentiality

Employees and contractors are entrusted with sensitive and proprietary information, including business plans, financial records, client data, and trade secrets. Confidentiality must be maintained at all times, and such information should not be shared with unauthorized individuals or outside parties, including competing agents, Brokerage, or firms. Employees and contractors must protect confidential data both during and after their employment or contract engagement.

Disclosure of confidential information, whether intentional or accidental, may result in disciplinary action, up to and including termination, as well as legal consequences. All data must be stored securely, and access should be limited to those with explicit permission.

2.8 Code of Conduct

Our code of conduct ensures that all employees and contractors act ethically and professionally at all times. Employees are expected to uphold the highest standards of integrity, respect, and honesty in their dealings with clients, colleagues, and external partners.

Key principles of our code of conduct include:

- Compliance with all applicable laws and regulations
- Maintaining a respectful work environment
- Avoiding behavior that could damage the reputation of the company
- Treating clients and colleagues with fairness and courtesy

Violations of the code of conduct may result in disciplinary action, up to and including termination.

2.9 Anti-Fraud and Anti-Corruption

We take a firm stance against fraud, bribery, and corruption. Employees and contractors must not engage in fraudulent activities, including falsifying records, misappropriating funds, or offering/accepting bribes. Any suspicion of fraud or corruption must be reported immediately to the Broker.

Violations will be investigated thoroughly, and legal action will be taken as appropriate. Disciplinary action for violations may include termination of employment or contract, as well as legal prosecution.

2.10 Professional Appearance Policy

Maintaining a professional image is important to Odyssey's success and reputation. Employees and contractors are expected to present themselves in a neat, clean, and business-appropriate manner.

Standards include:

- **Grooming:** Hair should be clean, neatly styled, and kept in a manner that does not interfere with professional duties. Facial hair should be clean, neatly trimmed, and well-maintained. Personal hygiene is essential.
- **Business Attire:** Employees and contractors should wear clean, pressed, and professional attire suitable for their role. Casual business attire may be acceptable on designated days, but must maintain a polished and clean appearance.
- **Fragrances:** Scented products, including perfumes, colognes, and lotions, should be used in moderation out of respect for colleagues and clients who may have sensitivities.
- **Accessories:** Jewelry, fingernails, makeup, and other accessories should be tasteful and appropriate, and should not hinder one's ability to perform his/her duties.
- **Piercings and Tattoos:** Piercings and Tattoos are permitted. However, they should be in moderation. Tattoos and/or piercings that may be provocative, controversial, discriminatory, or inappropriate for the professional standard must be covered and/or removed (piercings) when representing the Firm.

Exceptions: Exceptions to these standards may be made for religious, cultural, or medical reasons. Employees and contractors seeking exceptions should discuss their needs with the Broker to ensure reasonable accommodation is provided while maintaining the professional image of the Firm.

Adhering to these professional standards helps maintain the Firm's reputation and fosters a respectful and business-appropriate work environment for all.

2.11 Personal Relationships in the Workplace

Odyssey recognizes that personal relationships may develop in the workplace, but all employees and contractors must maintain professionalism and avoid conflicts of interest and/or potential harassment accusations. Romantic relationships between supervisors and subordinates are discouraged to prevent favoritism and conflicts.

Any personal relationship that may affect work performance or create an appearance of favoritism must be disclosed to the Broker. Management will review the situation and take action if necessary, including reassigning positions or duties, or termination in certain cases deemed inappropriate and consequential.

2.12 Workplace Safety

Odyssey is committed to maintaining a safe and healthy work environment. This includes:

- **Drug, Alcohol, and Smoke-Free Workplace:** The use of illegal drugs, alcohol, smoking, or vaping is prohibited in all company facilities and vehicles or during company sponsored, endorsed, or sanctioned events. Employees and contractors must not report to work under the influence of drugs or alcohol; subject to termination.
- **Workplace Violence Prevention:** Any form of violence, threats, or intimidation is strictly prohibited. Concerns about safety should be reported immediately to the Broker.
- **Emergency Closings:** In cases of severe weather, natural disasters, or emergencies, the firm will notify employees of any office closures or schedule changes.
- **Personal Guests and Visitors:** Personal guests and visitors are not permitted in the Firm's work areas without approval from management. All guests and visitors must sign in at the reception desk and be accompanied by an employee or contractor while on the premises and become the responsibility of the Firm's representative they are visiting.
- **Pet and Animal Policy:** With the exception of service animals as dictated by law, pets or animals of any kind are not permitted in the workplace to avoid potential risk of injury, allergic reaction, or distraction.
- **Children:** To maintain a professional, distraction-free workspace, and to protect children from potential risk, children are not permitted in the workplace unless approved by management.

Employees and contractors are responsible for following safety protocols, reporting hazards, and participating in any required safety training.

2.13 Company Property

The Firm's property, including all equipment, tools, and resources, provided for business purposes, must be used responsibly and maintained properly. Employees and independent contractors are expected to handle company property with care and report any damage, loss, or theft immediately to management. Unauthorized use, removal, or personal use of company property is prohibited and may result in disciplinary action including legal recourse.

Technology Tools and Resources: All technology resources and tools provided by the Firm or a contracted vendor, including hardware (computers, printers, cameras, and other electronic devices), software, and communication devices, are intended for business use only. Employees and independent contractors must use these resources in compliance with the Firm's policies and applicable laws. Personal use of technology resources should be minimal and must not interfere with work responsibilities. Any issues or malfunctions should be reported promptly to the IT representative or Broker. Unauthorized installation or use of software or modifications to technology resources is prohibited.

Intellectual Property: All intellectual property created or developed by employees and independent contractors during their engagement with the Firm, including inventions, designs, software, and proprietary information, remains the property of the Firm. Employees and contractors must respect and protect the Firm's intellectual property rights and not disclose, use, or reproduce such property without authorization. Any intellectual property-related issues or questions should be directed to management or the legal department for guidance.

2.14 Artificial Intelligence (AI) Use

The purpose of this policy is to guide the ethical and responsible use of artificial intelligence (AI) technologies at Odyssey Real Estate Services, LLC. We believe AI can enhance efficiency, insights, and customer service; however, it must be used thoughtfully to protect privacy, maintain data security, and ensure transparency and accuracy.

This policy applies to all employees, agents, contractors, and affiliates of Odyssey Real Estate Services, LLC, who use or may come into contact with AI technologies in the course of their work. This includes AI used for data analysis, customer service automation, marketing, and any other business-related activities.

A. Ethical and Responsible Use

- **Transparency:** Employees must disclose when AI-generated information is being used in communications with clients and stakeholders. AI is intended to supplement human decision-making, not replace it.
- **Accountability:** All users of AI must ensure accuracy and fairness in the information generated by AI tools. It is each employee's responsibility to verify AI-generated content before use.
- **Non-Discrimination:** AI should be utilized in a manner that is free of bias and discrimination. Users are expected to routinely evaluate AI outputs for potential biases and ensure equitable treatment for all individuals.

B. Data Privacy and Security

- **Client Privacy:** Personal data and client information must be safeguarded in accordance with Odyssey's data privacy policies. Employees must ensure that AI technologies do not compromise the confidentiality of client or employee data.

- **Data Usage:** Employees must only input data into AI systems that comply with Odyssey's data-sharing policies. Sensitive data, including personal identifiers or financial details, should not be used unless specifically authorized and encrypted.
- **Vendor Compliance:** When using third-party AI tools, Odyssey will work exclusively with vendors that uphold rigorous data security and privacy standards.

C. Data Privacy and Security

- **Fact-Checking:** AI-generated content must be reviewed for accuracy. Employees should verify information before presenting it to clients or using it in business materials.
- **Human Oversight:** AI should act as a support tool, and employees must exercise judgment before relying on AI-generated insights. Real estate decisions, advice, and client interactions should always be human-guided.
- **Continuous Improvement:** Odyssey will periodically assess AI tools to ensure they meet high standards for accuracy and relevance. Employees are encouraged to provide feedback on AI tools to support continuous improvement.

D. Compliance and Legal Considerations

- **Regulatory Compliance:** All uses of AI must comply with applicable real estate laws, including, but not limited to, data protection, anti-discrimination, and industry regulations.
- **Avoidance of Misrepresentation:** AI tools should never be used to misrepresent information. This includes using AI to manipulate images, testimonials, or market data.
- **Intellectual Property:** AI must not be used in ways that violate intellectual property rights, including using AI-generated content that infringes on copyrighted materials.

E. Employee Training and Awareness

- **Training:** Odyssey will provide training on ethical AI use, data privacy, and security best practices. Employees are encouraged to stay informed about the implications of AI in real estate and regularly participate in training sessions.
- **Awareness:** All team members should understand the potential impact of AI on the real estate industry and exercise responsibility in how they apply AI to daily tasks.

F. Prohibited Uses of AI

- **Surveillance and Monitoring:** AI should not be used to monitor employees or clients in any way that violates privacy rights or creates an uncomfortable or intrusive environment.
- **Unauthorized Automation:** Employees may not use AI to automate tasks or communications that require personal interaction or human discretion without prior approval from management.
- **Manipulation or Deception:** AI should never be used to deceive clients, competitors, or other stakeholders. All interactions must uphold Odyssey's standards of honesty and respect.

G. Policy Violations and Consequences

- **Any employee or affiliate found violating this policy may be subject to disciplinary action, which may include termination of employment or contract. Misuse of AI tools or failure to follow the guidelines outlined in this policy will not be tolerated.**
- **Any suspected violations should be reported to the Broker immediately for investigation.**

H. Review and Updates

This policy will be reviewed periodically to ensure it remains relevant in a rapidly evolving technological landscape. Revisions may be made in response to new regulatory requirements, advancements in AI technology, or company standards.

2.15 Social Media Use Policy

Odyssey Real Estate Services recognizes the importance of social media as a communication tool to promote our brand, engage with clients, and expand our reach. This policy outlines expectations and guidelines for the appropriate use of social media by employees and independent contractors. It covers both personal and professional use of social media platforms.

- A. Professional Representation** - Employees must disclose when AI-generated information is being used in communications.
- B. Confidentiality** - Do not share confidential or proprietary information about Odyssey Real Estate Services, clients, or colleagues without prior authorization.
- C. Compliance with Laws and Policies:** Social media use must comply with all federal, state, and local laws, including Fair Housing and privacy regulations, as well as Odyssey Real Estate Services' internal policies.
- D. Personal Opinions:** Clearly state that views expressed on personal accounts are your own and do not reflect the views of Odyssey Real Estate Services.
- E. Brand Consistency:** Use company-approved logos, branding, and marketing materials when representing Odyssey Real Estate Services online.
- F. Content Accuracy:** Ensure all shared information is accurate and factual. Do not post misleading or false claims.
- G. Respect and Courtesy:** Avoid defamatory, harassing, or offensive language, and treat others with respect.
- H. Disclaimers:** Include disclaimers such as "Not intended as legal or financial advice" when discussing real estate topics.
- I. Company-Related Social Media Activity:**
 - **Authorized Accounts:** Only designated employees or contractors may create and manage official company social media accounts.
 - **Approval Process:** Obtain prior approval before posting company-related announcements, promotions, or campaigns.

- **Monitoring and Moderation:** The company reserves the right to monitor its social media presence and remove inappropriate content.

J. Personal Social Media Use:

- **Separation of Personal and Professional:** Maintain clear boundaries between personal and professional accounts.
- **Endorsements and Testimonials:** Clearly disclose your affiliation with Odyssey Real Estate Services when making endorsements.
- **Time Management:** Personal social media use should not interfere with work responsibilities.
- **Reputation Management:** Be mindful that personal posts may impact Odyssey Real Estate Services' reputation.

K. Prohibited Activities:

- Sharing discriminatory or offensive content.
- Engaging in online disputes or arguments.
- Discussing confidential company or client information.
- Impersonating others or misrepresenting relationships.
- Posting unauthorized listings or marketing materials.
- Using company resources to post unauthorized content.

Enforcement

Violations of this policy may result in disciplinary action, including termination of employment or contract agreements. Odyssey Real Estate Services reserves the right to request the removal of any content deemed inappropriate or harmful.

2.16 Record Retention and Destruction

Odyssey is committed to managing records effectively, ensuring they are retained for the appropriate duration and securely disposed of when no longer needed. Records include physical and electronic documents related to the firm's operations, transactions, and communications.

Retention schedules will be established and reviewed regularly to ensure compliance with legal and regulatory requirements. Once records exceed their retention period, they will be destroyed securely to prevent unauthorized access.

2.17 Corporate Events

Corporate events provide valuable opportunities for growth, networking, and professional development. Employees and contractors are encouraged to attend sales meetings, seminars, networking events, and charitable activities that align with the firm's values.

Professionalism is expected at all times during these events, even in social or casual settings. Participation in events that promote the firm's goals is encouraged but generally voluntary unless otherwise specified.

3.1 Real Estate Settlement Procedures Act (RESPA)

At Odyssey Real Estate Services, LLC, we are committed to strict compliance with the Real Estate Settlement Procedures Act (RESPA), which promotes transparency and fairness in real estate transactions. RESPA ensures that consumers receive clear and accurate information regarding the costs involved in real estate transactions, preventing unethical practices such as kickbacks and referral fees between settlement service providers.

Key Requirements:

- **Disclosure:** All agents must ensure that clients receive accurate disclosures, such as a Loan Estimate (LE) and Closing Disclosure (CD) from the lender and settlement statements from escrow or title companies. These documents outline all costs associated with the transaction and agents are responsible for helping clients understand these documents.
- **Prohibition of Kickbacks:** Under RESPA, agents must not receive or provide any unearned fees or kickbacks for referrals to settlement service providers (lenders, title companies, inspectors). All fees must be tied to actual services rendered. Referral fees to other licensed agents are permitted, as long as they are disclosed.
- **Marketing and Advertising:** Any promotional activities, advertising, or referral of clients to settlement service providers must comply with RESPA regulations. Agents should avoid any activity that may be interpreted as an unearned kickback.
- **Record-Keeping:** Real estate agents are required to maintain accurate records of all transactions and disclosures provided to clients. Records should be kept for at least five years to comply with RESPA's documentation requirements. This includes copies of all forms, disclosures, and communications related to the settlement process. These documents may be electronic and/or physical records (printed), and provided to the Broker for safe-keeping.

Training: Agents are expected to participate in ongoing training to stay current with RESPA requirements and ensure compliance. The Firm will provide resources and training sessions to help agents understand and adhere to RESPA regulations.

Reporting Violations: Any suspected violations of RESPA, including improper disclosure practices or illegal referral arrangements, must be reported to the Firm's compliance officer immediately. The Firm will investigate all reported violations and take appropriate action to address and rectify any issues.

Compliance: Failure to comply with RESPA regulations can result in disciplinary action, including retraining, fines, or termination of employment. The Firm is committed to

maintaining the highest standards of compliance and integrity in all real estate transactions.

3.2 Fair Housing Act

Odyssey Real Estate Services, LLC is committed to upholding the principles of the Fair Housing Act (FHA), which prohibits discrimination in real estate practices. The FHA protects individuals from discrimination based on race, color, national origin, religion, sex, familial status, and disability.

Key Responsibilities:

- **Non-Discriminatory Practices:** Agents must provide equal treatment to all clients and prospects, ensuring that services, opportunities, and access to housing are provided without regard to any of the protected characteristics under the FHA.
- **Reasonable Accommodations:** For clients with disabilities, agents should assist in ensuring reasonable accommodations, such as modifications to properties, are made in compliance with the FHA.
- **Training:** All agents are required to participate in ongoing training on Fair Housing practices to ensure full compliance with federal and state laws. Agents must be aware of how their interactions, advertisements, and transactions align with these laws.

Failure to comply with the Fair Housing Act can result in severe penalties, including legal action, loss of licensure, and termination of contracts.

3.3 Antitrust Laws

Odyssey Real Estate Services, LLC is committed to maintaining a competitive and fair marketplace, fully complying with all antitrust laws. Antitrust laws are designed to prevent monopolistic practices and ensure fair competition.

Key Principles:

- **Price Fixing:** Price-fixing, where competitors agree to set prices at a certain level, is illegal. Odyssey agents must make independent decisions about commission (referred to as “Professional Fees” with the Firm) rates and pricing structures without consulting or coordinating with competitors.
- **Boycotting:** Engaging in or encouraging boycotts against specific competitors, clients, or service providers is prohibited. Each agent must avoid any practices that could be seen as anti-competitive or restrictive to open-market practices.
- **Sharing Sensitive Information:** Agents must not share proprietary or competitive business information with others in the industry. This includes details about commissions, client lists, and other confidential information.

Violations of antitrust laws may result in severe consequences, including fines, imprisonment, and damage to the company's reputation. All agents will receive training to ensure they understand and comply with these laws.

3.4 Compliance with Florida Real Estate Commission (FREC)

Odyssey Real Estate Services, LLC and its agents are governed by the Florida Real Estate Commission (FREC), a division of the Department of Business & Professional Regulation (DBPR), which establishes licensing and operational standards for real estate professionals in Florida. Adherence to these regulations is critical for legal and professional conduct in all real estate transactions.

Agent Responsibilities:

- **Licensing Requirements:** Agents must maintain an active Florida real estate license, fulfilling all requirements set by FREC, including continuing education and ethics training. The company provides resources and reminders to help agents stay current with licensing renewals.
- **Ethical Conduct:** Agents must adhere to FREC's strict code of ethics, ensuring honesty, transparency, and professionalism in all client interactions and transactions.
- **Reporting Violations:** Any violation of FREC regulations, including unethical behavior or non-compliance with licensing requirements, must be reported immediately. Disciplinary action may be taken, including suspension or termination.

Odyssey provides ongoing training and resources to help agents meet all FREC compliance requirements, promoting the highest professional standards in the industry.

3.5 Escrow and Trust Account Management

As a policy, the Firm typically does not maintain escrow and trust accounts, and defers all escrow and trust deposits to a real estate attorney or title company that maintains such accounts. All Earnest Money Deposits (EMD) and funds should be submitted directly to the escrow agent as designated by the seller or buyer agreement and not handled by the agent or employee of the Firm.

In the event the Firm opens escrow or maintains an escrow or trust account, a policy will be established to provide clear guidelines for the management thereof, ensures compliance with legal and regulatory requirements, maintains financial integrity, and protects the interest of the clients and the Firm.

3.6 Do Not Call and SPAM Compliance

At Odyssey Real Estate Services, LLC, we comply with the federal Do Not Call (DNC) and CAN-SPAM regulations, ensuring that our marketing efforts respect consumer privacy and preferences. The Firm cannot be held liable for third-party vendors who violate such laws, unknowingly or unwillingly by the Firm, its management, its agents, and/or representatives.

“Do Not Call” (DNC) Compliance:

- **Verification of Numbers:** Before making any telemarketing or outreach calls, agents must verify that the phone numbers are not listed on the National or State Do Not Call registries. Failure to comply with these regulations can result in significant fines to the caller.
- **Internal DNC List:** Odyssey maintains its own internal DNC list. Any individuals who request not to be contacted must be added to this list immediately and noted in their account through the Customer Relation Management (CRM) system.

SPAM Compliance:

- **Email Marketing:** All emails and text messages must comply with the CAN-SPAM Act, which mandates clear subject lines, sender identification, and an easy opt-out mechanism. Agents must not send unsolicited commercial emails without the recipient’s consent.
- **Opt-Out Mechanism:** All email marketing efforts must include a clear and simple way for recipients to opt-out of future communications. Violations of DNC or SPAM laws will result in disciplinary actions, which may include fines and/or termination.

3.7 Agency and Fiduciary Requirements

Odyssey Real Estate Services, LLC takes its agency responsibilities seriously. We adhere to all fiduciary obligations under Florida law, including single agency, transaction Brokerage, and transaction facilitator roles. Our primary concern is ensuring our clients’ best interests are protected.

Types of Agency Representation:

- **Single Agency:** As a single agent, Odyssey agents owe clients a fiduciary duty, including loyalty, full disclosure, confidentiality, and obedience. Agents must work solely in the best interest of the client.
- **Transaction Brokerage:** In Florida, Odyssey may serve as a transaction Broker, facilitating the transaction without fiduciary obligations to either party. Transaction Brokers must assist both parties fairly while maintaining transparency and compliance with state laws.
- **Dual Agency Prohibition:** Dual agency, where an agent represents both the buyer and the seller in a fiduciary capacity in the same transaction, is illegal in Florida. Agents must not engage in dual agency, and any potential conflicts should be reported to the Broker immediately.

Violations of agency requirements, especially involving confidentiality or conflict of interest, will lead to severe disciplinary action.

Affiliated Business Arrangements Disclosure (ABAD): The Firm must disclose any affiliated business arrangements that could potentially create conflicts of interest or affect the impartiality of services provided. This includes any relationships with third-party service providers, such as lenders or title companies, where there is a financial interest. The disclosure must be made to clients in writing and include information about the nature of the affiliation and any potential benefits to the Firm.

Compliance and Enforcement: All employees and independent contractors must understand and comply with these agency and fiduciary requirements. The Firm will provide training and resources to ensure adherence to these standards. Any concerns or potential violations should be reported to the compliance officer or management. Non-compliance with this policy may result in disciplinary action, including termination of employment or contract.

3.8 Training, Education, and Professional Development

Odyssey Real Estate Services, LLC encourages continuous learning and professional growth for all its agents. Staying informed about industry trends, legal changes, and new technologies is essential to providing clients with the best possible service.

Training Opportunities:

- **In-House Training:** Odyssey provides regular training workshops on compliance, customer service, marketing strategies, and market trends. Participation is mandatory to ensure agents are equipped with up-to-date knowledge.
- **Continuing Education (CE):** Agents are responsible for meeting the continuing education requirements mandated by FREC. While the firm offers access to CE courses, it is the agent's responsibility to stay compliant.
- **Certifications and Designations:** We encourage agents to pursue advanced real estate certifications, such as Certified Residential Specialist (CRS) or Graduate Realtor Institute (GRI), which enhance expertise and marketability.

Agents are required to actively participate in all required training, and failure to meet education requirements may result in loss of licensure and termination of the independent contractor agreement.

3.9 Company Services

Odyssey Real Estate Services, LLC provides a suite of support services to help independent contractors succeed in their business. These services include:

Management and Compliance Services: Odyssey ensures that agents comply with all local, state, and federal regulations and offers assistance with managing licenses, ethics, and legal standards.

Administrative Services: Our team provides essential administrative support, including appointment scheduling, client communications, document management, and more, helping agents focus on their core real estate activities.

Field Services: Field services include providing support for property review, showings, and open houses. Our field team provides hands-on assistance to ensure properties are maintained, presented, and marketed effectively. These services include installing and retrieving signage, lockboxes, key duplication (if needed), professional photography and videography of the property, and vendor coordination and access.

Transaction Management Services: We offer end-to-end transaction management services to ensure smooth real estate transactions, from contract initiation to closing.

Marketing Services: From social media marketing to print advertising, Odyssey offers comprehensive marketing services that help agents promote their listings and personal brand

Legal Services: We offer access to expert legal services to handle real estate-related legal matters such as contract disputes, title issues, and compliance concerns. Our legal team provides guidance on local, state, and federal regulations, ensuring that all transactions are legally sound and that agents have the support needed to resolve legal challenges.

Financial Services: The Firm provides training on business development, including building an effective and successful business plan, business creation and registration, as well as access to expert financial service providers that include training and assistance in budgeting, financial and estate planning, retirement, and tax planning for real estate professionals. These services are aimed at helping agents and contractors maintain financial health and compliance.

Ancillary Services: Ancillary services encompass a variety of additional support offerings, including relocation assistance, vendor referrals, home staging, and maintenance services. These services add value to clients by providing a full-service experience, from moving logistics to property enhancements, allowing agents to offer a complete suite of solutions.

3.10 Commission (Professional Fee) Policy and Procedures

The Firm's commission (known as "Professional Fees") policies are designed to ensure clarity, fairness, and transparency in the distribution of professional fees for real estate transactions. These policies outline how commissions are structured, earned, and disbursed for both buyers' and sellers' agents, including provisions for referrals, discounts, and Broker firm fees. All commissions are subject to final approval by the Broker and must comply with local and state regulations.

Professional Fee Policy for Buyers: Commissions for buyer representation are negotiated between the Firm, the buyer, and the seller. The buyer's representative typically receives a percentage of the property's sales price as outlined in the buyer agency agreement.

Professional Fee Policy for Sellers: Seller's agents earn commissions based on a percentage of the property's sales price, as specified in the listing agreement. The Firm offers a Seller's Menu of Services, detailing options for sellers to select from that includes a tiered fee structure to alleviate objections and provide consumers with choices. Ultimately, the seller's agent is responsible for negotiating their commission rate and ensuring that it is clearly stated in the listing agreement.

Discounts/Concessions/Rebates: Any commission discounts, concessions, or rebates must be pre-approved by the Broker. Agents are prohibited from offering or agreeing to any reductions in commission without written approval. This includes any incentives offered to clients or cooperating agents. All discounts must be clearly outlined in the contract and comply with legal guidelines.

Referrals: Referral fees are paid to licensed real estate agents or brokers who refer clients to the Firm. The referral fee percentage must be agreed upon in writing before the transaction, and payment will be made upon successful completion of the transaction. Referrals from unlicensed individuals may not be compensated under state and federal law.

Commission Disbursement Authorization (CDA): The Commission Disbursement Authorization (CDA) form must be submitted and approved by the Broker prior to the closing of any transaction. The CDA details the agreed-upon commission splits, referral fees, and any other deductions or payments that need to be made from the commission. No commissions will be disbursed without an approved CDA. The CDA will be submitted to the closing agent (title company or law firm) for disbursement of funds.

Payout: Commissions will be paid out to agents according to the terms outlined in the CDA and/or the Firm's internal payment schedule. Agents must ensure that all required documentation is submitted promptly for timely disbursement. Delays in document submission may result in delayed payouts.

Taxes and Expenses: Agents are responsible for their own tax liabilities and should account for income taxes, self-employment taxes, and any other relevant obligations. The Firm does not withhold taxes from commissions unless legally required. Additionally, agents are responsible for covering any personal business expenses incurred during transactions unless otherwise agreed upon with the Firm.

Broker Firm Fees: The Firm charges fees for each transaction, which may be deducted from the agent's commission or passed through to the client. These fees help cover operational costs, compliance oversight, and other administrative expenses. The amount of Broker firm fees will be outlined in the CDA and may vary depending on the transaction type and other factors.

3.11 Client Acquisition Policy and Procedures

Lead Generation: The Firm employs various strategies to generate leads and attract potential clients. Agents are encouraged to diversify their lead generation methods and adhere to ethical standards in acquiring new clients. The following methods may or may not be used in lead generation:

- A. **Lead Generation Companies:** The Firm may employ third-party lead-generation companies and vendors to generate leads for contracting agents and may charge a referral fee for all Firm-acquired leads. Agents may work with their own pre-approved third-party lead generation companies to receive client leads, as well. The Firm may provide recommendations, but agents must ensure compliance with privacy laws and data protection when using such services.
- B. **Farming:** Farming refers to consistently marketing to a specific geographic area or demographic. Agents are responsible for nurturing these areas by building relationships through consistent communication, events, and marketing efforts. The Firm's marketing coordinator will help agents with collateral and consistent marketing efforts to generate leads through this method.
- C. **Direct and Digital Mail:** Agents may use direct mail campaigns, such as postcards or newsletters, and digital mail strategies, including email marketing, to target potential clients. All campaigns must comply with spam laws and include opt-out mechanisms for recipients. To ensure compliance, all marketing must be preapproved by the marketing coordinator or ordered through the marketing coordinator to ensure branding consistency and regulatory compliance.
- D. **Cold Calling:** Cold calling prospective clients is allowed but must be done in accordance with Do Not Call list regulations. Agents must ensure they have not contacted individuals who have opted out of such communications.
- E. **Door Knocking:** Door knocking is highly discouraged by the Firm for safety and security reasons, as well as respect for homeowners' privacy and adherence to local laws and HOA regulations regarding neighborhood solicitation. Consider less antiquated methods for marketing and face-to-face networking, such as event attendance and participation.
- F. **Paid Ads:** The Firm and its agents may run paid advertisements on social media platforms and other online channels. Paid ads must be preapproved by the marketing coordinator and align with the Firm's brand and comply with all advertising regulations, including proper disclosures.
- G. **Social Media:** Social media is a vital tool for client acquisition. Agents are encouraged to use platforms such as Instagram, Facebook, and LinkedIn to promote listings and engage with potential clients while adhering to the Firm's social media policy. Preapproved custom-built templates are made available by the marketing department.

- H. **Open Houses:** Open houses are a proven strategy to attract potential buyers and sellers. Agents are responsible for organizing and hosting open houses while complying with local regulations and Firm policies regarding client safety and data collection. As a policy, open houses should be conducted with two people – the primary listing or showing agent – and an assistant to help clients, setup, and reduce safety risks.
- I. **Events:** Events, such as local community gatherings or real estate seminars, are an excellent way to network and generate organic leads. The Firm and its agents may host or participate in several social, charitable, community, or networking events. Agents are encouraged to represent the Firm professionally at all events and leverage these opportunities to meet prospective clients, potential partners, and the real estate community.

Customer/Client Service: Providing exceptional customer service is a core principle of the Firm. Agents must communicate effectively, respond to inquiries promptly, and prioritize the needs and interests of clients. Maintaining a high level of professionalism and ethical conduct in every client interaction is mandatory.

Buyer Representation: The Firm offers buyer representation services that ensure buyers are well-informed throughout the purchasing process. Starting with a Buyer Broker Agreements (BBA), agents must act in the best interest of buyers, providing them with market knowledge, negotiating on their behalf, and adhering to fiduciary responsibilities.

Seller Representation: Representing sellers involves marketing the property, negotiating offers, and guiding clients through the closing process. Agents must execute listing agreements that clearly outline their role, commission structure, and the Firm's commitment to transparency and effective marketing.

Investor Representation: Agents representing investors must possess a thorough understanding of investment strategies, market conditions, and property valuations. The Firm expects agents to provide data-driven advice and support investors in making informed decisions on acquisitions, management, and sales.

Rentals and Leasing: The Firm does not currently engage in property management or acquiring rental properties, engage in leasing, or work with tenants, except in helping clients connect with property managers and other agents with leasing opportunities.

Commercial Leasing and Sales: Commercial real estate services require specialized knowledge. Agents working in this area must be familiar with zoning laws, market trends, and commercial property valuations. The Firm encourages continuous education in commercial real estate to better serve clients and preapproval from the Broker to engage in commercial sales.

Land Leasing and Sales: Land transactions require expertise in land use, zoning, environmental issues, and development potential. Agents must be knowledgeable about land acquisition processes and ensure that clients are aware of relevant legal and financial considerations.

New Construction Sales: New construction sales involve working closely with developers and buyers to guide them through the construction process. While most new construction properties have designated sales agents, keep in mind they represent the builder. As a representative of our clients, agents must work with the builder's sales agent to ensure open lines of communication, timeline updates, construction progress, and market conditions are communicated effectively.

Specialization: Agents are encouraged to specialize in areas of real estate that align with their strengths, interests, and market demand. Whether in luxury homes, first-time buyers, or commercial properties, agents who specialize are expected to remain informed of trends and developments in their chosen niche. For agents who acquire customers or clients that are seeking an area of specialization beyond the agent's knowledge or expertise, it is highly recommended the client be referred to an internal specialist for a referral fee in order to ensure a positive client experience, compliance, and risk reduction.

3.12 Insurances

E&O Insurance: Errors & Omissions (E&O) insurance provides protection for the company and its agents against claims related to professional negligence, errors, or omissions in the services provided. All licensed agents and staff providing professional services to clients must maintain active E&O insurance, provided for a minimal cost to the agent through our third-party insurance provider.

General Liability Insurance: The Firm will maintain an active General Liability insurance policy to cover incidents involving third-party bodily injury, property damage, or other liabilities occurring on company premises or during the course of business activities. General Liability insurance does not cover claims of professional errors or omissions, which are covered under the E&O insurance policy, or employee injuries, which are covered under Workers' Compensation.

Automobile Insurance: All agents and employees who use personal vehicles for company-related business must maintain active auto insurance coverage that meets or exceeds the state's minimum liability requirements, as mandated by law.

For safety and liability reasons, agents and employees are strictly prohibited from transporting customers, clients, vendors, or their affiliates to showings or other events. Any individual who chooses to transport others does so at their own risk and liability. Such actions are not authorized, endorsed, or supported by the firm, its management, or its ownership. The agent or employee acknowledges and understands that the firm bears no liability or responsibility for any potential legal action arising from such activities.

If company-owned vehicles are used, the Firm will provide appropriate full-coverage insurance under a business auto-insurance policy.

Accident Reporting: Any accident that occurs while driving for company business must be reported immediately, regardless of fault. A police report should be obtained when applicable, and all relevant documentation must be submitted to management.

3.13 Legal Procedures and/or Lawsuits

Lawsuits or Legal Actions: The company will respond promptly and professionally to any lawsuit or legal action filed against it, its employees, or its agents. All legal matters must be reported immediately, and no employee or agent is authorized to engage in legal discussions or settlements without approval from the company's legal counsel.

This policy establishes the procedures for responding to lawsuits, legal claims, or actions taken against the company or its agents. The goal is to protect the company's interests, minimize legal risks, and ensure compliance with all legal requirements.

Policy Requirements:

A. Immediate Notification:

Any employee or agent who receives a lawsuit, legal claim, or notice of pending legal action related to company activities must notify management within 24 hours of receipt.

All documentation, including legal notices, summons, or court documents, must be forwarded to the company's legal team or designated contact person immediately.

B. Legal Counsel Involvement:

Only the company's designated legal counsel or authorized representatives are permitted to respond to legal actions, file paperwork, or engage in settlement discussions.

Employees and agents are prohibited from discussing or negotiating legal matters directly with any opposing parties, attorneys, or media without legal counsel's direction.

C. Internal Investigation:

Upon notification of a lawsuit or legal action, an internal investigation will be conducted by management to gather facts and relevant documentation. Employees and agents involved are required to cooperate fully with the investigation.

D. Confidentiality:

All details of legal actions and lawsuits must remain confidential. Employees and agents are prohibited from discussing the matter with anyone outside of authorized personnel to protect the company's legal interests.

E. Insurance Notification:

If applicable, any lawsuit that may fall under the company's insurance coverage, such as Errors & Omissions (E&O) or General Liability, must be reported to the relevant insurer immediately to ensure proper coverage and defense.

F. Resolution and Settlements:

Settlements, legal agreements, or resolutions must be approved by legal counsel and senior management before being finalized. Employees and agents are not authorized to enter into settlements on behalf of the company.

G. Non-Compliance Consequences:

Failure to follow the legal procedures outlined in this policy may result in disciplinary action, up to and including termination, as well as legal consequences for the individual involved.

4.1 Your Employment with the Firm

Employment At-Will:

All employment with the company is on an at-will basis. This means that either the employee or the company may terminate the employment relationship at any time, with or without notice, and for any lawful reason. This policy does not alter the at-will nature of employment, which remains in place unless otherwise provided by law or agreed upon in writing by the company.

Employee Relations:

We are committed to fostering an environment of open communication and mutual respect between employees and management. All employees are encouraged to express concerns, provide feedback, and engage in problem-solving processes. The company promotes collaboration, transparency, and accountability in all employee interactions.

Outside Employment:

Employees are permitted to engage in outside employment or business ventures, provided such activities do not interfere with their job performance or create a conflict of interest with the company. Employees must disclose any outside employment that may pose a conflict, and management will review it on a case-by-case basis.

Employment Classification:

Employees are classified into one of the following categories:

- **Full-Time:** Employees regularly scheduled to work 32+ hours or more per week.
- **Part-Time:** Employees regularly scheduled to work fewer than 32 hours per week.
- **Temporary:** Employees hired for a specific period or project. Employment classifications determine eligibility for benefits and are subject to change based on the company's operational needs.
- **Independent Contractor:** Independent contractors, such as agent partners, are not considered employees of the company as defined by labor laws, although they are contracted to perform specific duties and tasks on behalf of the company.

Probationary Period:

All newly hired employees will be subject to a 45-day probationary period from the date of their employment. This period serves as a time for both the employee and the company to assess whether the employee is a good fit for the position and the company culture, by evaluating employee's performance, attendance, work habits, and overall fit for the role. It also provides employees with an opportunity to familiarize themselves with the job responsibilities, expectations, and policies. During the probationary period, employees may not be eligible for some or all benefits.

Schedule:

Work schedules vary by department and position. Employees will receive their work schedules from their supervisors, with shifts subject to change based on business needs. Flexible scheduling may be available based on role requirements and management discretion.

Meals and Breaks:

Employees are provided meal and rest breaks in accordance with applicable state and federal laws. Typically, all employees working more than eight (8) hours in a given period are entitled to a 60-minute lunch break. Breaks are unpaid for hourly employees. Breaks must be coordinated with supervisors to ensure proper coverage of phones and client interactions.

Timekeeping:

Accurate timekeeping is essential to ensure correct compensation and compliance with labor regulations. All non-exempt employees are required to track their work hours using the company's designated timekeeping system. Any discrepancies or issues must be reported to HR or a supervisor immediately.

Overtime:

Non-exempt employees are eligible for overtime pay for hours worked in excess of 40 hours per week, or as otherwise mandated by applicable law. Overtime must be pre-approved by the Broker. The company complies with all federal, state, and local laws regarding overtime pay.

Deduction from Pay | Safe-Harbor Exemptions:

The company makes deductions from pay only as permitted by law, including for taxes, benefits, garnishments, and other authorized deductions. Exempt employees must be paid on a salary basis and will not have improper deductions made from their salary. Any improper deductions will be corrected promptly upon notice.

Compensation and Schedule:

The company offers competitive compensation based on industry standards and employee experience. Employees will be informed of their compensation package upon hire, including salary, hourly rate, and any applicable bonuses. Hourly and salaried employees are paid bi-weekly on Wednesdays, resulting in 26 annual paychecks. Employees may elect direct deposit or a physical check. Employees starting within 5 days of a payday will not receive pay until the next payday.

Employment of Relatives and/or Domestic Partners:

The company allows the employment of relatives and domestic partners as long as it does not create a conflict of interest or compromise the company's standards of fairness. Relatives and domestic partners may not be in direct reporting relationships with one another, and decisions regarding employment will be based solely on qualifications and merit.

Attendance:

Regular and punctual attendance is expected of all employees. Employees must notify their supervisor in advance of any absence or tardiness. Excessive absenteeism or

lateness may result in disciplinary action, up to and including termination. Employees who do not call in or fail to show up for work for more than three (3) days, will be considered voluntarily terminated, except when there is a medical (or comparable) emergency that prevents the employee or his/her representative from contacting the Firm.

Performance:

Employee performance is evaluated on an ongoing basis through feedback, coaching, and formal performance reviews. Employees are expected to meet established performance standards and objectives. Performance evaluations will consider an employee's job knowledge, skills, attendance, and adherence to company policies.

Separation from Employment and Final Pay:

Separation from employment may occur through resignation, termination, or mutual agreement. Employees who choose to resign should provide at least two weeks' notice. The company may terminate employment with or without cause, consistent with the Employment At-Will policy. Upon separation, employees must return all company property, and final pay will be issued in accordance with applicable laws, which states final wages will be paid by the next regular payday following termination. Any unused PTO will be forfeited and will not be paid out on the final paycheck.

4.2 Time-Off and Leaves of Absence

Paid Time Off (PTO):

Paid Time Off (PTO) is offered to eligible employees for personal, vacation, or sick time. PTO is accrued based on length of service and employment classification. Employees must request PTO in advance and obtain supervisor approval, except in cases of illness or emergency, and must be used in no less than 30-minute increments. Approval is subject to management discretion and operational needs.

No more than eight (8) hours of PTO may not be carried over beyond the calendar year unless otherwise specified or approved by the owner. PTO may only be used up to the accrued amount. Any amount over the current available amount will be unpaid time off.

Unpaid Time Off (UTO):

Unpaid Time Off (UTO) is available when an employee has exhausted all PTO or in situations where PTO is not applicable. UTO may be requested for personal reasons, emergencies, or other circumstances. Employees must request UTO in writing, providing as much notice as possible. Approval is subject to management discretion and operational needs.

Religious Observances:

Employees may take time off for religious observances. The company will make reasonable accommodations for religious practices, provided that such accommodation does not cause undue hardship on business operations. Employees should notify their supervisor in advance of any planned religious observance requiring time off.

Jury or Civic Duty | Court Appearances:

Employees summoned for jury duty or required to appear in court for civic duty will be granted time off. Employees must provide their supervisor with a copy of the summons or court notice as soon as possible. While the time off is generally unpaid, employees may use PTO for this period. Retaliation for fulfilling civic duties is strictly prohibited.

Military Leave:

The company complies with the Uniformed Services Employment and Reemployment Rights Act (USERRA). Employees called to serve in the military will be granted unpaid leave to fulfill their military obligations. Upon returning, the employee will be reinstated to their position or a comparable one, provided they meet the eligibility criteria under USERRA.

Family and Medical Leave (FMLA):

The company provides Family and Medical Leave in accordance with the Family and Medical Leave Act (FMLA).

Entitlement

Eligible employees may take up to 12 weeks of unpaid, job-protected leave within a 12-month period for:

- The birth or adoption of a child.
- To care for a spouse, child, or parent with a serious health condition.
- A serious health condition that makes the employee unable to perform their job.
- Any qualifying exigency arising out of the military deployment of a spouse, child, or parent.

Benefits and Protections Under FMLA

Employees on FMLA leave are entitled to:

- Continued health insurance coverage under the same terms as if they had continued working.
- Restoration to the same or an equivalent position upon return from leave.

Employee Eligibility

To be eligible for FMLA, an employee must:

- Have worked for the company for at least 12 months.
- Have worked at least 1,250 hours during the 12-month period prior to the leave request.
- Work at a location where at least 50 employees are employed within 75 miles.

Serious Health Conditions

A serious health condition is an illness, injury, or physical or mental condition that requires either inpatient care or continuing treatment by a healthcare provider.

Use of Leave

FMLA leave may be taken intermittently or on a reduced schedule if medically necessary. Employees must make reasonable efforts to schedule leave to minimize disruption to the company.

Substitution of Paid Leave for Unpaid Leave

Employees are required to use any available PTO during FMLA leave, which will count toward the 12-week FMLA entitlement. Once PTO is exhausted, the remaining leave will be unpaid.

Employee Responsibilities

Employees must provide 30 days' advance notice for foreseeable leave. When leave is unforeseeable, employees should notify the company as soon as practicable. Employees must also provide sufficient medical certification to support the leave request.

Company Responsibilities

The company will inform employees of their FMLA rights and responsibilities, and whether they are eligible for FMLA. The company will also notify employees if leave will be designated as FMLA and whether paid leave will be substituted.

Other Provisions

FMLA leave may be taken for military caregiver leave, which provides up to 26 weeks of unpaid leave to care for a covered service member with a serious injury or illness.

Unlawful Acts by Employers

Employers may not interfere with, restrain, or deny the exercise of any right provided under FMLA. Employers may not retaliate against employees for taking FMLA leave.

Enforcement

The U.S. Department of Labor enforces the FMLA. Employees may file complaints with the Department of Labor or bring a private lawsuit against an employer for violations.

Bereavement Leave:

Employees may take up to five (5) days of paid leave following the death of an immediate family member. Immediate family includes a spouse, child, parent, sibling, or grandparent. Additional unpaid leave may be granted at management's discretion and may be deducted from available PTO after five days. Otherwise, anything over five days will be unpaid.

Time Off for Voting:

Voting in local, state, and national elections is highly promoted and encouraged by the Firm as part of our civic right and responsibility. Employees will be granted up to three (3) paid hours for time off to vote in federal, state, or local elections if their work schedule prevents them from voting during non-working hours. The company encourages employees to vote and will comply with any applicable state laws regarding time off for voting. Employees should notify their supervisor in advance if they require time off to vote.

Parental Leave:

The company offers parental leave to eligible employees following the birth, adoption, or placement of a child. This leave is designed to support new parents in bonding with their child and managing family responsibilities.

Eligibility

Employees must have worked for the company for at least 12 months and for a minimum of 1,250 hours in the 12-month period preceding the leave.

Both full-time and part-time employees are eligible.

Duration of Leave

Eligible employees may take up to 12 weeks of parental leave. This leave can be taken consecutively or intermittently within the first year of the child's birth or placement.

Paid vs. Unpaid Leave

Parental leave may be a combination of paid and unpaid leave, as follows:

- Employees may use any accrued Paid Time Off (PTO) during parental leave.
- Once PTO is exhausted, the remaining parental leave will be unpaid.
- The company will continue to provide health insurance during parental leave under the same terms as when the employee was working.

Parental Leave and FMLA

Parental leave runs concurrently with any leave taken under the Family and Medical Leave Act (FMLA), meaning it counts toward the employee's 12-week FMLA entitlement if applicable.

Requesting Parental Leave

Employees must provide at least 30 days' notice before taking parental leave when the need for leave is foreseeable. For unforeseeable circumstances, employees should notify the company as soon as possible. A formal leave request and any necessary supporting documentation (e.g., birth certificate or adoption papers) must be submitted to the supervisor or designated HR representative.

Job Protection

Upon returning from parental leave, employees will be reinstated to the same or a comparable position with the same pay and benefits, in accordance with FMLA and applicable state laws.

4.3 Employee Benefits and Perks

Health Benefits:

The company offers comprehensive health benefits to eligible full-time employees. These benefits include medical, dental, and vision coverage. Employees may choose from a variety of plans tailored to meet different needs, with the company contributing a portion of the premium. Coverage begins after the employee completes 30 days of employment. Employees may add dependents, and any changes to benefits due to life events (e.g., marriage, birth of a child) must be reported within 30 days of the event.

Life Insurance:

The company provides basic life insurance coverage for all eligible employees at no cost. This benefit offers a financial safety net for the employee's designated beneficiaries in the event of death. The coverage amount is typically equal to the employee's annual salary. Employees have the option to purchase additional life insurance or add coverage for dependents at their own expense.

Disability:

The company offers both short-term and long-term disability insurance to full-time employees, protecting them in the event they are unable to work due to illness or injury. Short-term disability coverage begins after a qualifying period of absence (usually 7 days) and provides partial income replacement for up to 12 weeks. Long-term disability begins after short-term benefits are exhausted and provides continued income replacement, typically up to 60% of the employee's salary, for the duration of the disability or until retirement.

401(k):

The company offers a 401(k) retirement savings plan to help employees prepare for the future. Employees are eligible to participate after completing 90 days of employment. The company may offer a matching contribution up to a certain percentage of the employee's salary, which will be communicated upon enrollment. Employees can choose how their contributions are invested from a range of options, and all contributions are made on a pre-tax basis.

Workers' Compensation:

The company provides workers' compensation insurance in accordance with state law. This coverage protects employees in the event of a work-related injury or illness, covering medical expenses and providing partial wage replacement during recovery. Employees must report any work-related injury or illness to their supervisor immediately to ensure proper documentation and timely access to benefits.

Employee Assistance Program (EAP):

The company offers an Employee Assistance Program (EAP) to support employees facing personal challenges, such as stress, mental health concerns, financial difficulties, or family issues. The EAP provides confidential counseling and referral services, available at no cost to employees and their immediate family members. Employees can access these services 24/7 through the EAP hotline or online resources.

These policies reflect our commitment to offering comprehensive benefits and perks to support the well-being of our employees, both personally and professionally.

4.4 Termination of Employment

Termination of employment may occur for various reasons, including voluntary resignation or involuntary termination. The following policies outline the procedures and expectations for both types of termination.

Voluntary Termination:

Voluntary Termination occurs when an employee chooses to end their employment with the company. This includes resignation or retirement.

- **Notice Period**

Employees are encouraged to provide at least two weeks' notice before resigning to ensure a smooth transition. Written notice should be submitted to the employee's supervisor.

- **Exit Process**

Upon receipt of resignation, the employee's supervisor and HR will:

- Conduct an exit interview to gather feedback and ensure all necessary tasks are completed.
- Review any outstanding obligations, including return of company property.
- Finalize any remaining paperwork and arrange for the final paycheck, including payment for unused PTO if applicable.

- **Final Pay**

The final paycheck, including payment for unused PTO if applicable, will be issued according to the company's payroll schedule or as required by law.

Involuntary Termination:

Involuntary Termination occurs when the company decides to end the employee's employment. This includes termination for cause (e.g., performance issues, policy violations) or without cause (e.g., layoffs, organizational restructuring).

- **Termination for Cause**

Termination for cause may be implemented due to serious misconduct, poor performance, or violation of company policies. The process generally includes:

- Documentation of performance issues or policy violations.
- An opportunity for the employee to address the concerns, typically through a performance improvement plan or disciplinary action.
- A meeting to discuss the termination decision, where the employee will be given the reasons for their termination and provided with any final documentation.

- **Termination Without Cause**

Termination without cause may be due to factors such as downsizing or restructuring. The process generally includes:

- Notification of the decision to terminate, which may be given with advance notice or as a result of immediate termination.
- Providing severance pay or other benefits, if applicable and in accordance with company policy or employment agreements.
- Conducting an exit interview and ensuring the return of company property.

- **Final Pay**

For involuntary termination, the final paycheck will be issued according to the company's payroll schedule or as required by law. This paycheck will include all earned wages, and any applicable severance pay or unused PTO as stipulated in the company's policies or employment agreements.

- **Exit Process**

The HR department will coordinate the following:

- Collection of company property, including keys, badges, equipment, and documents.
- Termination of access to company systems and accounts.
- Provision of information regarding benefits continuation and other post-employment resources.

- **Appeals and Grievances**

Employees who believe their termination was unjust or did not follow company policy may submit a written appeal to HR. The appeal will be reviewed according to the company's grievance procedure.

General Provisions

- **Confidentiality:** All termination proceedings and related discussions are confidential.
- **Final Documentation:** Employees are encouraged to review and sign any necessary documentation regarding their termination to confirm their understanding and acceptance of the final terms.

This policy ensures that both voluntary and involuntary terminations are handled consistently and professionally, adhering to legal requirements and company standards.