

Handbook

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WELCOME AND PURPOSE OF THE HANDBOOK

Welcome! As an employee or advisor of Brooktone Financial it is important for you to be aware of our Code of Conduct and the additional Company policies and practices contained within this handbook. This handbook will also help you become familiar with the Company's benefits and overall conditions of employment.

As you know, a Company handbook cannot deal with every situation that may arise. However, it does address those policies, practices, and issues employees are most likely to encounter on a day-to-day basis. If at any time you have a question regarding this handbook, please consult with your supervisor.

Ours is an atmosphere of open communication that encourages everyone to work together to reach common goals. At Brookstone Financial we encourage and appreciate your constructive opinions and comments. As an employee of our company you are expected to use your skills, experience and dependable performance to help the company continue to be successful.

The Purpose of this handbook is to assist you in becoming familiar with our policies and procedures.

This handbook is **not** a binding contract of employment; it is a set of guidelines, policies, practices, and benefits that will be reviewed and revised periodically. They are subject to modification and termination by the company at any time with or without notice. The Company also has the exclusive authority, in its discretion, to interpret the policies, procedures, and benefits listed and determine the application of such policies, procedures, and benefits in any given situation.

This handbook should not be distributed to any persons other than employees of Brooktone Financial.

EQUAL OPPORTUNITY EMPLOYER

Brookstone Financial is dedicated to the goal of providing equal employment opportunity for all persons without regard to age, race, creed, color, religion, disability, marital status, sex, national origin, ancestry, sexual orientation, or membership in the national guard, state defense force or any other reserve component of the military forces of the United States or this State or any other legally protected states, or for any other legally protected reason, as required by law.

The Company believes that equal employment opportunity makes good business sense, so it insists that all employees of the Company refrain from any act which is designed to cause unlawful employment discrimination against a fellow employee or applicant for employment, including but not limited to discrimination in hiring, placement, transfer, demotion, promotion, recruiting, advertising, compensation, training, termination, Company-sponsored events, or use of employee benefits or facilities.

CODE OF CONDUCT

The Code of Conduct contains principles on how the Company intends to do business and how it expects its employees and service providers to do business with the Company.

In general, Company employees are required to obey all laws and regulations of the United States and its various states and other governmental authorities as well as any foreign country in which we do business. You are responsible for ensuring that your conduct complies with all applicable legal and regulatory requirements as well as with Company policies. You are also responsible for the behavior and actions of any employees you may supervise. You must ensure those employees are familiar with Company policies and that they are complying with them.

BUSINESS CONDUCT

- 1. All business will be conducted in a lawful and ethical manner.
- 2. All client and fellow employee information shall be held confidential.
- 3. No employees shall offer or promise payment or reward of any kind, directly or indirectly, to any person, organization, or governmental representative in order to secure preferential treatment for the Company and its employees.
- 4. No employee shall engage in, allow, or conceal any financial or administrative irregularity.
- 5. All Company payments are to be entered in the Company ledger; no payment shall be disguised by false, artificial, or misleading entries. No payment shall be made with the intent or understanding that any portion of it is to be used other than as described in supporting documents.
- No employee may personally benefit from his or her employment with the Company
 except through compensation received directly from the Company. This prohibition does
 not apply to discounts offered by merchants, which are available to all employees of the
 Company.
- 7. No employees may engage in any act that involves theft, fraud, embezzlement, misappropriation or wrongful conversion of any property including that of the Company, regardless of whether or not such act could result in criminal proceeding. This includes all transactions involving the Company's clients. This prohibition includes unauthorized use of the Company's communications equipment, computers, or other Company assets.
- 8. No advisor/agent may solicit or conduct business in a state in which he or she is not properly licensed to do so.

CONFLICT OF INTEREST

 Employees may not engage in any activity – including outside employment – which places his or her interest, or the interest of other persons or groups, ahead of the best interests of Brookstone Financial. 2. Employees are obligated to review their personal and employment situations and discuss any possible conflicts or interest that arises by virtue of their own activities or the activities of their immediate family members with their Supervisor.

CONFIDENTIAL INFORMATION

In the normal course of business, there will be instances in which employees may be entrusted with confidential or privileged information. That information most often will involve Registered Representative or Investment Advisor, and Client personal information. Its Registered Representatives, Investment Advisors, and Clients have entrusted this information to the Company.

The disclosure of such information would be detrimental to the interests of the Company and, therefore, it is the duty of all employees possessing information of a confidential nature to:

- 1. Respect and protect such information
- 2. Avoid without exception, the use of such information for personal gain.
- 3. Refrain from disclosing such information to those outside the Company as well as to other employees who do not have a need to know.

Questions regarding what is or what is not confidential or privileged information should be directed to your supervisor.

DRUG, CONTROLLED SUBSTANCES, AND ALCOHOL ABUSE POLICY GUIDELINES AND PROCEDURES

BACKGROUND AND PURPOSE

Brookstone Financial has a vital interest in maintaining safe, healthful and efficient working conditions for its employees, and the employees have the right to expect that such a working environment be maintained. Being under the influence of a drug or alcohol on the job may pose serious risks to the best interests of fellow employees, the Company, and the Company's clients.

The Company recognizes that its own health and future are dependent upon the physical and psychological health of its employees. Accordingly, it is the right, obligation and intent of the Company to maintain a safe, healthful and efficient working environment for all of its employees and to protect Company property, equipment, operations, and customers.

With these basic objectives in mind, the Company has established the following Policy Guidelines with regard to the use, possession, distribution, or sale of alcohol or drugs. Compliance with these Policy Guidelines is required as a condition of continued employment with the Company.

GENERAL

The final decision on any question regarding implementation of the Policy Guidelines rests with the Company. If you have any questions, please contact your supervisor. The Company reserves the right to modify, eliminate, or change these Policy Guidelines therein at any time, with or without notice. Nothing in this Policy Guideline is meant to alter the fact that employment with the Company is at-will, which means that either the employee or the Company may terminate the employment relationship at anytime without notice, for any reason or for no reason at all, with or without cause.

POLICY

Employees are expected to report for work and remain at work in a condition that enables them to perform their duties free from the effects of alcohol and drugs. The possession, use, sale, purchase, dispensing, distribution or manufacture of any illegal drug(s), controlled substance(s), or alcohol, or being under the influence of same, by any employee while in the workplace, on Company premises, or in the conduct of Company-related work off-site is prohibited as set forth more specifically below.

Alcohol

Being under the influence of alcohol by any employee while in the workplace or on Company premises will subject the employee to disciplinary action, up to and including termination. Except as permitted by Company management, the possession, use, sale, purchase, dispensing, or distribution of alcohol in the workplace, on Company premises, or in the conduct of Company-related work off-site is prohibited and will subject the employee to disciplinary action, up to and including termination.

Legal Drugs

Except as provided below, the use or being under the influence of any legally obtained drug by any employee while in the workplace, on Company premises, or in the conduct of Company-related work off-site is prohibited to the extent that such use or influence may, in the Company's opinion, affect the safety of co-workers, clients, the employee's job performance, or the efficient operations of the Company, and will subject the employee to disciplinary action, up to and including termination. Employees who have been informed or who are aware or should be aware that the use of a legal drug may present a safety risk or work performance issue are to report such drug use to their Manager prior to starting work. An employee may stay at work if the Manager has determined that the employee's safety, the safety of co-workers, or that the legal drug does not significantly affect the employee's job performance. If the Manager does not so determine, the employee may be required to take a medical leave of absence or comply with other appropriate action determined by Management.

Illegal Drugs

The possession, use, purchase, dispensing, distribution, or manufacture of any illegal drug(s) or illegal controlled substance(s) or being under the influence of same, by any employee while in the workplace, on Company premises, or in the conduct of Company-related work off-site is prohibited and will subject the employee to termination.

Searches

The Company reserves the right to conduct searches for illegal drugs, illegal controlled substances, or alcohol on the Company premises where there is reasonable suspicion to believe that a violation of the Company's Drug, Controlled Substances and Alcohol Abuse Policy has occurred, or where circumstances, accidents, security reasons, incidents, or workplace conditions justify.

Searches of employees and their personal property, including vehicles may be conducted at any time in order to maintain a safe, secure, healthful and efficient working environment.

Employees who refuse to cooperate during these searches will be subject to disciplinary action, up to and including termination.

Disciplinary Action

Violation of this Policy can result in disciplinary action, including termination, even for first offense.

The Company also may take disciplinary action, including termination for an employee's off duty involvement with drugs, controlled substances or alcohol. Off duty involvement includes, but is not limited to, incidents where such involvement is, in the Company's view, damaging to the Company's reputation or business, and/or inconsistent with the employee's job duties or image, or in certain situations, when the off duty conduct constitutes criminal behavior.

Notification of Criminal Drug Statute Conviction

Any employee, who is convicted for a violation of any criminal drug Statute, evidenced by a finding of guilt (including a plea of "no contest"), imposition of a sentence, or both, must notify their Manager of such conviction no later than five (5) days after it occurs. Failure to comply with this requirement will result in termination.

SEXUAL HARRASMENT AND OTHER HARRASSMENT POLICY

Brookstone Financial, LLC. is committed to insuring that all employees work in an atmosphere free from all forms of discrimination. Therefore, all forms of harassment are prohibited.

Company policy, in accordance with federal and state discrimination laws, prohibits the use, in the workplace, of racial or sexual epithets and stereotypes, slang words or names, graphic materials, or any other language or actions which by their nature or effect harass, degrade or insult a person, or any group of persons, on any basis, including but not limited to, race, color, sex, national origin, religion, age, or physical or mental impairment. Company policy and applicable laws prohibit sexual harassment, which is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when the following conditions apply:

- 1. Submission to such conduct is either explicitly or implicitly a term or condition of an individual's employment;
- 2. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting the individual;
- 3. Such conduct creates an intimidating, hostile, or offensive work environment which seriously affects the psychological well-being of the employee; or
- 4. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance.

Any person or group of persons, including but not limited to employees, customers, salesman, or other third parties, who believes they have been the subject of sexual harassment or any other form of harassment, should report the alleged act immediately to the Manager or Owner.

Company policy prohibits any employee from retaliating in any way against any person or group of persons who has raised a concern about harassment. An investigation will be undertaken immediately. Any manager or employee found, after the appropriate investigation, to have harassed another person or group of persons, including but not limited to employees, customers, salesman and other third parties, shall be subject to the appropriate disciplinary action, which may include demotion or discharge. The appropriate personnel will be notified of the alleged act and of the results of the investigation.

WORKPLACE VIOLENCE POLICY

Threats, harassment, aggressive or violent behavior, or other types of inappropriate behavior by or to employees, customers, visitors, or others, will not be tolerated. Any individual, who believes that they have been subjected to or has experienced threats, harassment, aggressive/violent behavior, or other inappropriate behavior, must report the behavior immediately to their Supervisor. Upon receipt of such a report, the Supervisor will initiate investigation and take any necessary corrective measures.

Any employee who has been subjected to threats or aggressive/violent behavior while away from work should immediately report such incidents to their Supervisor if the employee reasonably believes that

the behavior may interfere with the workplace. When necessary, the Supervisor should be notified prior to a Supervisor intervening in any situation that may constitute a violation of this policy

Employees failing to adhere to this policy, or engaging in activities prohibited by the policy, will be subject to disciplinary action, up to and including termination.

COMPUTER POLICY

The purpose of Brookstone Financial's computers and computer network is to conduct Company business. All computer equipment, software, e-mail messages, and files are company property. Guest network is available for client usage on premises. Under no circumstances should the login credentials or password to the secure network be provided to anyone other than Brookstone staff, advisors.

SOFTWARE:

- The Owner or your Supervisor must approve all software. No outside software/data is to be run on the desktop computer or server without authorization.
- All software must be licensed it is a violation of federal law to install unlicensed software on a computer.
- Altering or modifying software configurations on other employees' workstations is prohibited.
- Computer games are not allowed on Company computers.

E-MAIL:

- All messages and files created, sent or received using Brookstone Financial computers are
 property of the Company. Messages that are created, sent, or received while using the
 Company's computers are the property of the Company.
- Proper e-mail "etiquette" should be followed at all times. Personal email should not take place "on the clock" on company time.
- Attachments containing copyrighted, proprietary, or business confidential information cannot be secured or sent through the Brookstone Financial email system.
- No chain letters are allowed. Please contact your Supervisor if you receive any form of chain letter, virus alert or other mass email messages.
- E-mail messages may not contain content considered offensive or disruptive. Offensive content includes, but is not limited to, obscene or harassing language or images, racial, ethnic, sexual, or gender-specific comments or images that would offend someone on the basis of their religious or political beliefs, national origin, gender, or age.
- Employees may not without authorization receive or read e-mail that was not sent to them.

VIOLATIONS:

- Violations of this policy will result in disciplinary action up to and including termination and/or legal action, if warranted.
- Employees should report any misuse of the Company software, e-mail, or Internet policy to their Supervisor.

INTERNET POLICY

"Inappropriate use" of the Brookstone Financial Internet system by Company employees includes:

Connection to non-work related sights during normal working hours;

Connection to pornographic sites or sites with sexual connotations at any time (pictures, jokes, etc.);

Connection to sites that would violate the Company's harassment policy;

Excessive sending/receiving non-work related e-mail; or

Storing large amounts of non-work related material on the Company's server.

Employees should not engage in any of the above. Employees are expected to report for work and remain at work to perform assigned duties. Internet activities should be used to conduct Company business. Visiting web sites, indicted above, is not appropriate.

Any employee in violation of the Internet policy will be disciplined first with a verbal warning; if the misuse continues, the Supervisor will investigate and take appropriate action.

FALSE INFORMATION

Applicants for employment with Brookstone Financial are expected to provide complete and accurate information regarding their background, employment history, credentials, and qualifications for employment. If, following employment, the Company learns that an employee concealed, made a false statement or intentionally failed to answer any questions fully and accurately the employee will be subject to termination of employment, regardless of the time lapsed before the discovery.

ENFORCEMENT AND REPORTING OF CODE OF CONDUCT VIOLATIONS

Employees should report any suspected violation of the aforementioned policies to one or more of the following: their supervisor or the Owner.

No employee may be subject to any retribution for the good faith reporting of a violation. In fact, disciplinary action will be taken against anyone who retaliates against an individual for reporting a violation. Submission of knowingly false reports, however, constitutes a violation of this Code and will result in disciplinary action.

Failure to comply with the Code of Conduct, and all policies contained therein, can have severe consequences for both the individuals and the Company. The Company will impose appropriate discipline for violations of the Code, which may include demotions, suspensions, or termination of employment with the Company and the forfeiture of any benefits or rights that are forfeitable upon such termination.

The Office Manager and/or Owner will promptly investigate all violations. The Company will handle any corrective action and will take further steps, if needed, to avoid a recurring violation. All employees should cooperate fully with an investigation and respond truthfully and fully to inquiries made by the Company. Withholding information could result in disciplinary action.

OFFICE OPENING & CLOSING PROCEDURES

OPENING PROCEDURES

- 1. Turn on all the lights in the common office area
- 2. Turn on the TVs something non-finance related (travel channel, cooking show)
- 3. Check messages in all mailboxes
- 4. Confirm all trash cans are empty
- 5. Put away all dishes
- 6. Make sure that coffee station is fully stocked
- 7. Organize reception tables and re-stock necessary business cards, client rewards, books (Innovations In Retirement Planning), magazines, etc.

CLOSING PROCEDURES

- 1. Confirm the next day's appointments
- 2. Prepare any next-day "to-do" lists
- 3. Empty the trash
- 4. Put away/wash any lingering dishes
- 5. Log off computer
- 6. Turn off office lights
- 7. Make sure the back door is locked

SERVICE STANDARDS & PROCEDURE

THREE STEPS OF SERVICE

- 1. A warm and sincere greeting. Use the client name often, if and when possible.
- 2. Anticipation and compliance with client needs.
- 3. Fond farewell. Give them a warm good-bye and use their names often, if and when possible

THE 10-BASICS

- 1. The three steps of service must be used in every interaction to ensure client satisfaction, retention and loyalty.
- 2. Each employee will continuously identify defects throughout Brookstone and report to management immediately.
- 3. It is the responsibility of each employee to create a work environment of teamwork and lateral service so that the needs of our clients and each other are met.
- 4. Client needs are our first priority. When a client has a problem, situation or special need, you should address and resolve the issue immediately. If you cannot address the problem on your own, you must report it to management without delay.
- 5. Uncompromising levels of cleanliness are the responsibility of every employee.

- 6. To provide the finest personal service for our clients, each employee is responsible for identifying and recording individual client preferences.
- 7. Smile. Always maintain positive eye contact. Use the proper vocabulary with our clients. (Use words like "Good Morning," "Certainly," "I'll be happy to," and "My pleasure.")
- 8. Smile every time you answer or are speaking on the telephone. Use client name when possible. When transfer is necessary personally contact the party transferring to, notify them of client name and purpose of transfer. If call is being transferred to you answer using client name and state your name and that you will be happy to assist. If ever necessary to place a client on hold ask "May I place you on hold?" first. Adhere to voice mail standards and never transfer a client to voicemail without their permission. Always use "my pleasure" in place of "you're welcome".
- 9. Take pride in and care of your personal image by adhering to Brookstone Financial clothing and grooming standards.

Protecting the assets of Brookstone is the responsibility of every employee. Properly maintain our property, conserve energy and protect the environment.

TELEPHONE ETIQUETTE PROCEDURE

Incoming Call Greeting:

Good (morning/afternoon)! Thank you for calling Brookstone Financial, This is **YOUR NAME**. How may I assist you?

General Etiquette:

- Smile! A smile can be heard on the phone. What they hear may be the only impression they
 have of our firm.
- Use client name when possible.
- Keep your enthusiasm up through the call. Enthusiasm is contagious.
- Be focused on your conversation. Nothing else.
- Be respectful of the client's time. Apologize for any waits they have to experience.
- Eliminate call transfers whenever possible. When a transfer is necessary, personally contact
 the party your transferring to and notify them of the client name and purpose of transfer –
 BEFORE THE TRANSFER
- If a call is being transferred to you, answer using client name, state your name, and let them know you will be happy to assist.
- If it is ever necessary to place a client on hold ask, "May I place you on hold?" first.
- Adhere to voicemail standards and never transfer a client to voicemail without their permission.
- Always use "my pleasure" in place of "you're welcome".

Properly Screening Calls:

- If they ask for the Rep and he/she is available, send them through.
- If they ask for the Rep and he/she is not available for any reason:

First attempt say: He/she is not available (or "he/she is tied-up") at the moment. Is there someone else that can assist you?

If the caller insists they still only want to speak to the Rep, then say:

2nd attempt: Okay, I'll be happy to let them know you called. Would you prefer to leave a message with me or leave a voicemail so that he/she can return your call?

Don't forget to ask, "Is this time sensitive?"

When listening to the caller's response, screen for client service issues and forward to the proper individual rather than directly to the rep or sales assistant.

APPOINTMENT CONFIRMATIONS

- 1. Appointments are to be confirmed the day prior to the appointment. Confirm Monday's appointments on Friday.
- 2. In CRM, select Calendar, select the Month you are in, select the "number" of the date you will be confirming.
- 3. Select the person whose appointments you will be confirming under the "ME" link at the top of the screen. You will see that person's appointments for the one day only.
- 4. When clicking on the calendar event, the client/prospects phone number can be found on the "Linked Contacts" on the right hand of the screen after clicking the calendar event.
- 5. Call the client using one of the following scripts:

<u>PROSPECT</u>

- a. Hello <u><CLIENT'S NAME></u>. This is <u><YOUR NAME></u> calling from Brookstone Financial, how are you doing today? Great (etc.)
 I'm calling to confirm your appointment for tomorrow (or Monday), <u><DATE OF APPOINTMENT></u>, at <u><TIME></u>, with <u><ADVISOR></u>.
 You know where we are located right? (If not, give directions.) Wonderful, we look forward to seeing you then. Goodbye.
 If this is their first appointment, remind them to bring the following paperwork with them:
 - i. Investment Profile Questionnaire if we sent them an "Introduction Kit".
 - ii. Most recent tax return.
 - iii. All insurance policies and statements.
 - iv. Copy of Trust (if applicable)

EXISTING CLIENT

- b. Hello, this is calling from Brookstone Financial.
 I'm calling to confirm your appointment for tomorrow (or Monday), APPOINTMENT, at calling from Brookstone Financial.
 I'm calling to confirm your appointment for tomorrow (or Monday), CADVISOR
 I hank you and we look forward to seeing you then. Goodbye.
- 6. If you reach the client and they confirm:
 - a. Type CONFIRMED at the end of the "Subject" line.
 - b. Make any notes pertinent to the conversation in the "Description" box.
 - c. Select "Save Activity" and move on to the next appointment.
- 7. If the client needs to reschedule:
 - a. Check availability on the Advisor's calendar and with the client.
 - b. Once a new date and time have been agreed upon, change the date on the top to be the date of the new appointment.
 - c. Change the time of the appointment to the new time.
 - d. Make a note in the "Description" box as to the original date of the appointment, reason for the change, and the date of the new appointment.
 - e. Note in the "Description" box "RESCHEDULED FROM <date>"
 - f. Make sure that the proper "Category" is selected.
 - g. Select "Save activity"

- 8. If the client wishes to cancel and may or may not reschedule:
 - a. Type CANCELLED after their names in the "Subject" line
 - b. Change the Category to "Cancelled"
 - c. Make notes as to the reason the appointment was cancelled in the "Description" box.
 - d. If the appointment was for a Prospect coming in for the first time, ask the front desk administrator for the feedback sheet
 - e. Select "Save Activity." <u>Notify the Advisor right away if an appointment is</u> cancelled.
- 9. Schedule an Activity to call the Opportunity back in one week to reschedule.

 Continue to call weekly until the appointment has been rescheduled.
- 10. If you leave a message, type L/M Mach (Left Message On Machine) in the Activity line. Select "Save activity."

If they call back to confirm, simply change the L/M Mach to CONFIRMED.

DELIBERATE ACTS OF APPRECIATION

QUARTERLTY BUDGET = \$250 PER STAFF MEMBER

ALL ACTS OF APPRECIATION MUST BE DOCUMENTEND AS OUTLINED BELOW, AND MUST NOT EXCEED \$100 PER CLIENT, PER YEAR

Deliberate Acts of Appreciation occasions to be on the lookout for: (THINK UNIQUE AND UNEXPECTED)

New home
Further education
Death of pet
Remodeling complete
New dream car
Community award
Etc.

Information should be collected from Clients during **appointments**, **phone calls** and **client events** and recorded in RedTail as noted in the "Documenting client preferences, Interests and points of contact" procedure.

Gift Ideas Include:

- Flowers
- Gift basket with specialty coffees & cookies
- Divot repair tool
- Wine & cheese gift basket
- Gift certificate to favorite restaurant
- Magazine subscription
- Book from favorite author
- Fresh ground coffee
- Hand-written notes /cards
- Picture and frame from event client attended
- Recipe cards
- Music CD

If you decide to perform a deliberate act of appreciation, please be sure to complete the following

steps:

- 1. Check RedTail notes to ensure there has not been another deliberate act of appreciation performed in the past three months for that client. If there has been and you still feel you should proceed, first check with the Advisor.
- 2. Log details of the act in RedTail under the clients account by adding a note. Begin the note with, "DELIBERATE ACT OF APPRECIATION:" and then type the details of the act. Include the item purchased, where it was purchased, cost, and what the note said.
 - a. Your name, the date and time will be automatically stamped in the record.
- 3. Add User Defined Field "Deliberate Act of Appreciation" and date in format Year, Month, Day "XXXX/XX/XX"
- 4. Email the Advisor to inform him that you performed a deliberate act of appreciation on his/her behalf.

Log the act on your personal Quarterly Bonus Report, which is to be turned in to your supervisor at the end of the quarter.

ADDITIONAL COMPANY POLICIES

BUSINESS HOURS/ CORE WORK HOURS

Business hours are 9:00 AM – 5:00 PM Eastern Standard Time, Monday through Friday. Core required work hours for all salaried employees are from 9:00 AM – 5:00 PM Monday through Friday unless otherwise approved. Exceptions must be approved and documented by supervisor or owner.

ATTENDANCE POLICY

This attendance policy is being implemented in an effort to clarify the Company's attendance expectations and to administer them fairly and consistently for every employee. As a Wealth Management, Client-centric Firm, attendance is crucial to the success of our business and, therefore, employees are expected to at be work during normal business hours.

<u>WALK OFF THE JOB:</u> A "walk-off" the job is any time an employee leaves the premises during normal business hours without advising their Supervisor. A walk off the job will be considered a voluntary resignation of employment.

NO CALL, NO SHOW: A no call no show is considered any scheduled work day when the employee does **not** call in to their Supervisor on their cell phone by 8:30 AM of any given work day. Occurrences of No Call No Shows will be handled with written warnings up to Termination of Employment

If an employee does call in, but not within the specified time the reason will be reviewed and MAY result in some disciplinary action.

<u>CALL-IN:</u> A call-in is defined as any time an employee calls-in within the designated call-in time (by 8:30 AM of any given work day). An occurrence will be each workday that the employee calls-in or if the employee is gone two or more consecutive days with physician documentation. Call-ins due to inclement weather will be reviewed by the employee's Supervisor to determine if it is an occurrence. For absences of six or more consecutive days please see the Leave of Absence Policy. Absences covered under the Leave of Absence Policy will not be counted as an occurrence.

Occurrences/Calendar Year

Five Seven **Disciplinary Actions**

Verbal Warning – Documented Written warning/Possible Drop in Pay

Eight Written warning/Drop in Pay
Ten Termination

Submitted medical documentation must be on physician/clinic letterhead or printed prescription pad, to include the clinic or physician name. All medical documentation must indicate the dates the employee was physically unable to work. If an employee must be absent from work to care for a seriously ill spouse or family member, the medical documentation must clearly indicate the necessary dates.

<u>TARDINESS</u>: Tardiness is any time an employee reports for work after their starting time. Tardiness due to inclement weather will be reviewed by their Supervisor to determine if it will be an occurrence. To provide for extenuating circumstances, such as an accident, the Supervisor will review individual situations throughout this process.

Occurrences/Calendar Year Disciplinary Actions

Three Verbal warning – Documented Five Verbal warning – Documented Written warning/ Possible Drop in Pay

Seven Written warning/ Drop in Pay

Ten Termination

<u>APPOINTMENTS, LEAVING SICK:</u> An appointment is considered to be any time the employee leaves work for an appointment during normal business hours. Advance notice of 48 hours is required and the Supervisor must give approval. This 48 hour notice is not required for leaving sick; however, approval by the Supervisor is still required.

Occurrences/Calendar Year Disciplinary Actions

Five Verbal warning – Documented
Ten Written warning/ Possible Drop in Pay
Fifteen Written warning/ Drop in Pay

Twenty Termination

<u>COMBINATIONS OF ABOVE:</u> If an employee has a verbal warning from one of the above sections, and reaches the verbal warning occurrence level in another section, they will be issued a written warning and possibly a drop in pay.

INCLEMENT WEATHER

Weather in the area can be unpredictable and will, at times, cause road conditions to be less than ideal. During those times, employees need to exercise **good judgment** when deciding whether or not to travel. Brookstone Financial values the safety of its employees and discourages taking unnecessary risks during inclement weather. In the event of severe weather, such as a tornado, employees will be notified that the business is closed until it is safe to re-open. Your Supervisor or the Owner will notify each employee by phone.

If the office is CLOSED, this means that you are not to report to work and do not need to call-in.

Brookstone Financial may also have optional workdays due to inclement weather. This means if you feel you can make it safely to work, you may report to work. If you feel it is too hazardous to drive to work you may stay home, however, it is your responsibility to notify your Supervisor.

When work has been cancelled prior to the start of a workday because of severe weather, employees will not earn pay for that day. Employees can opt to use vacation or personal days for the inclement weather days. If work is cancelled during a normal business day, all employees will be credited with a full day of pay. If as employee, you decide to leave before the end of the business day, you will not be paid for the remainder of that day. If an employee loses pay due to inclement weather, they will be able to make up time lost at an overtime rate (time and a half).

PROGRESSIVE DISCIPLINE POLICY

All employees after the 90-day trial period are given the opportunity to correct problematic behavior through progressive disciplinary steps. The normal steps are verbal warning for the first infractions, followed by verbal written and/or written warnings for all subsequent infractions:

- 1) A first written warning given to an employee may correspond with a pay decrease. The employee will be given suggestions on how to change behavior.
- 2) A second written warning given to an employee in a 12-month period will correspond with a pay decrease. The employee will be advised the next written warning in the process is cause for automatic termination of employment.

Three written warnings within a 12-month period is cause for automatic termination of employment. However, under certain circumstances where the severity of the infraction(s) warrants, the Company reserves the right to deviate from the steps, as it deems appropriate.

The following are cause for IMMEDIATE DISMISSAL:

- 1) Disclosing proprietary information about the Company, its Broker/Dealer, or its clients.
- 2) Stealing from the Company or fellow employees.
- 3) Willful destruction of Company property.
- 4) Using alcohol or controlled substances on Company property.
- 5) Flagrant absenteeism.
- 6) Flagrant insubordination or maliciousness.
- Other reasons that may occur which directly affect the Company, its Broker/Dealer, or other employees in an adverse manner.

DRESS CODE

The following dress code was established to promote and provide a professional image to all clients, vendors, and visitors. Dress code is business casual. Formal business attire (i.e. suits, ties, etc.) is still an option for all office employees and is encouraged if employees feel more comfortable wearing it. If an employee is meeting with clients, vendors, visitors, etc., Formal Business attire is suggested. This dress code is in effect for all employees.

MEN'S DRESS CODE

Formal Business Attire: Suits, dress shirts, ties, dress slacks, socks, and sport coats.

Business Casual Attire: Casual shirts with collars, short and long sleeved shirts with or without ties, sweaters, turtlenecks, Dockers/slacks/trousers, vests, socks, loafers and any attire mentioned under Formal Business Attire.

Unacceptable Attire: Jeans, shorts, colored denim, bib overalls, outlandish styles or clothing which is too revealing or tight fitting, t-shirts, sweatshirts, shirts with distasteful designs or printing, tennis shoes, beach sandals, hiking boots, torn or worn clothing, or sweat/wind suits.

WOMEN'S DRESS CODE

Formal Business Attire: Suits, dresses, skirts, dress slacks, blouses, nylons/socks, and blazers. **Business Casual Attire:** Casual dresses, shirts/blouses, Dockers/slacks/trousers, flats, dress sandals, heels, and any attire mentioned under Formal Business Attire.

Unacceptable Attire: Spaghetti strap dresses, low cut/bare back dresses or shirts, mini-skirts, t-shirts, tank/tube/halter top shirts, t-shirts of any kind worn with matching cotton pants, sweatshirts, skirts shorter than 1 inch above the knee, shirts with distasteful designs or printing, casual/jean shorts, outlandish styles or clothing which is too revealing or tight fitting, tennis shoes, beach sandals, hiking boots, flip flops, torn or worn clothing, spandex leggings, sweat/wind suits, jeans, or bib overalls.

Everyone is expected to be well groomed and dressed as stated and adhere to the above during normal working hours.

All clothing worn is subject to the discretion of the management. If you have any questions, contact your Supervisor.

ADDITIONAL EMPLOYMENT INFORMATION

PAYCHECK DIRECT DEPOSIT

Paychecks are based on a two-week work period for all employees and advisors. Brookstone Financial has a direct deposit plan through E-Payroll, and direct deposit is expected for all employees. Contact the Office Manager for changes to your direct deposit.

NOTIFICATION OF ABSENCE

All Brookstone Financial employees are expected to be at work at 8:45 AM and should be at work no later than 9:00 AM; normal business hours from 9:00 AM to 5:00 PM Monday through Friday. If you are unable to be here by 9:00 AM, or are unable to be at work for any given workday, you must contact your Supervisor by 8:30 AM on their cell phone.

It is very important that you notify Brookstone Financial when you are going to be absent or late so that proper coverage of your responsibilities can occur. Failure to notify Brookstone Financial as specified above will be considered a no call, no show absence and may result in disciplinary action. Furthermore, all approved vacations and leaves should be placed on the Advisors Assistant Calandar once approved. For employees who are not in their training period, three consecutive no call-no show absence will be considered your voluntary resignation. Any no call, no show absence for an employee in their training period will result in disciplinary action up to and including termination. If an employee does call in, but not within the specified time, the reason will be reviewed and may result in disciplinary action.

PARKING

Brookstone Financial is a Client-centric business. Therefore, employee cars should be parked away from the main entrance so that clients have first available parking. Owners of vehicles improperly parked or parked in the wrong area will be asked to move the vehicle immediately. It is recommended that employees keep their cars locked while in the parking lot. The Company assumes no responsibility for any damage to, or theft of, any automobile or personal property left in any automobile in the Company parking lot.

BREAK AND LUNCH PERIOD

All full-time hourly employees are given two paid 15-minute breaks and a 60-minute unpaid lunch period.

All salaried employees are expected to take their lunch between 11:00 AM and 1:00 PM unless previous arrangements are made with their Supervisor. This means that lunch breaks should commence no later than 12:30 PM without prior approval from your Supervisor. During lunch breaks, you must notify a co-worker, or your supervisor to cover any necessary tasks or phone calls while you are away from lunch. All staff must refrain from taking lunch during the same period of time as to avoid a shortfall in service.

TRAINING AND TRIAL PERIOD

All new Brookstone Financial employees are hired for a 90-day trial period and must complete a training period of 30 days. All training periods end on the Sunday following the designated time period. During this period, employees will learn how to do their jobs and the responsibilities and expectations associated with it.

New employees must meet performance criteria, including but not limited to the following, in order to successfully complete the training period: (a) arrive to work on time, (b) work required hours, (c) demonstrate accuracy and improvement in needed job skills, (d) perform the job with good work attitude (i.e. exhibit team work, show a willingness to learn new things, not talk or wander excessively,) (e) demonstrate excellent customer service, and (f) if applicable, display the expertise for which they were hired. If the Company is in doubt about a new employee's performance ability, his/her training period could be extended. If the Company is in doubt about a new employee's performance ability after his/her training has been extended, it may be determined that the employee is not a good fit for the Company.

TELEPHONE USAGE

The telephone plays a vital role in conducting business. Where some personal phone calls are acceptable, all employees must limit personal usage of the phone. Personal usage of the phone will be regulated by Supervision. All calls will be monitored for adherence to phone etiquette.

CELL PHONE USAGE

Cell phones play a vital role in conducting business for Brookstone Financial Registered Representatives, Investment Advisors, and Agents as cell phones are a means of their client contacts. For Office Staff, cell phones are discouraged. If Office Staff do have cell phones in the office, they should be on "vibrate" or "silent" settings. Cell phones are not to be used in general office areas, in the Company or Public restrooms, or in front of Brookstone Financial clients, vendors, or guests. Cell phone usage should be kept to a minimum; for special circumstances, please see your immediate Supervisor. Excessive cell phone use may result in disciplinary action.

OFFICE SUPPLIES, SYSTEMS & SUPPORT

All new employees are furnished with necessary desk supplies. Most basic desk supplies, such as note pads, pens, paper clips, folders, binders, etc., can be found in the Brookstone Financial supply shelves in the mini kitchen of the Northshore home office. All other items can be requested from the Operations Department at the home office. Only systems approved for use at Brookstone Financial will be allowed to be installed on Brookstone PCs & Laptops. Furthermore, only the systems used and approved by Brookstone Financial will be supported.

EMPLOYEE RECORDS

It is important for each Brookstone Financial employee to maintain accurate records and notes within the employees AA file. Keeping these records and notes up to date enables the Company to reach an employee in an emergency and properly maintain payroll and benefits documentation. It is the employee's responsibility to update in AA, any changes in name, mailing address, phone number, marital status, number of dependents, beneficiary designation (if applicable) and who to notify in case of an emergency.

SEPARATION OF EMPLOYMENT

Brookstone Financial hopes that your employment will be long term and mutually beneficial and rewarding to both the Company and yourself. Brookstone Financial does recognize, however, that the employer and employees for a variety of reasons terminate employment relationships. Although the Company would prefer a minimum of two week notice for a voluntary separation of employment to

allow for the Company to arrange for a replacement, we recognize that your employment with the Company is an at-will employment relationship can be terminated with or without cause, and with or without prior notice, at any time, for any reason or for no reason at the option of Brookstone Financial or yourself. This at-will employment relationship may not be changed by any conduct or written document unless the President of the Company specifically acknowledges such change in writing.

If you decide to resign your employment, we do request you complete a letter of resignation and submit it to your Supervisor. The Supervisor will contact employees upon the receipt of the letter of resignation to schedule an exit interview if possible.

The terminating employee's copy of the Company handbook must be returned to the Office Manager by the last date of employment.

ADVISER – AGENT – REGISTERED REP. INFORMATION

WORKSHOP/SEMINAR POLICIES PROCEDURES & BEST PRACTICES

The Basics

Staying in front of qualified prospects is at the core of building your client base. Workshops and public seminars have proven to be an effective method of doing so. While serving a nice meal can often boost the number of attendees, it's not always necessary. The typical cost of a workshop including venue, mailer, and food will typically be in the \$3500-6000 range depending on the number of pieces mailed. Typically we expect to see response rates in the .70-1.0% range. If you mailed 6000 pieces, you should expect approx. 42-60 RSVPs. A successful appointment closing ratio is often seen as closing 60% of the room on scheduling a first appointment.

The Presentation

It's important to keep in mind that "less is often more". We encourage all advisors conducting workshops to keep the presentation in the 40-55 minute range. While we do encourage audience participation, the level of participation can drastically affect the length of the workshop. The most important part of your presentation is the open and the close. Use story based selling to captivate the room in the first three to five minutes and wrap-up with a compelling close and clear call to action. We HIGHLY RECOMMEND that each advisor be accompanied by two "appointment setter" assistants during each workshop. The assistants will assist in checking in the guests and going around the room (BEFORE DINNER) to book the appointments on your calendar. It's important to set all appointments the night of the workshop. Every hour that passes after the event, your chances of booking the appointment diminish.

Tips

- ✓ Get the participants engaged! The sooner you can get them talking and interacting, the better your chances of getting, and keeping their attention.
- ✓ Have multiple calls to action throughout the workshop. We suggest that workshops be broken down into 4-6 segments or topics. At the end of each segment, the participants should be asked to check "YES, I want more information" on the handout related to this particular segment. When the appointment setters collect the sheets at the end, the "YES" answers provide leverage for them to set the appointment.
- ✓ First impression is everything. When your attendees arrive, EVERYTHING should be set and ready to go. You should not be setting up the screen, arranging tables, etc. as attendees are arriving. We often have attendees arrive 30 minutes in advance, so be prepared well in advance.
- ✓ Use emotion, personal experience, and storytelling to drive your point
- ✓ When using PowerPoint you're a "Presenter". When using a whiteboard or flipchart, you're a "Teacher".
- ✓ Blend "High Tech" and "High Touch" by utilizing both Powerpoint and Whiteboard/Flipchart
- ✓ Use the Blackout Feature during your presentation. Blackout the screen when you want the audience to focus on you. This can be easily accomplished by mastering the "Blackout" feature of PowerPoint

- ✓ Use plenty of props. Props are great to break up the workshop. If using the "Puzzle" planning analogy, have a jigsaw puzzle as a prop to drive the point. Another example may be the Tax Code Book to hold up in order to drive home the complexity of the tax system. Props are always a plus!
- ✓ Break up the workshop flow with a small giveaway or two for those that engage and answer a question posed to the audience.

Payment Plans & Product Sponsors

As previously mentioned, the all-in cost of a typical dinner seminar will be in the \$3500-6000 range. It's important for every adviser/agent to have "skin in the game" to ensure the highest possible closing ratios. As an adviser of Brookstone Financial we will support your efforts by offering a zero interest loan to finance your workshops. This loan will be seen as an advance against future production. Repayment plans can be structured to accommodate each individual adviser's level of production. The first balance must be paid in full prior to scheduling the next workshop.

We encourage the participation of product sponsors and their financial support. It is the responsibility of each adviser to negotiate the level of financial support and then pass that information along to accounts receivable for follow-up. Keep in mind that a product sponsor's level of support is based upon your current or expected future production with that company. A sponsors involvement or financial support must never skew your fiduciary duty to recommend what is in the best interest of your client.

GROUP E&O PARTICIPATION REQUIREMENTS & RELATED COSTS

Participation in the group E&O insurance is a requirement for all agents, advisers, and registered reps. doing business with Brookstone Financial. Upon every renewal of our group policy, we will make every effort to shop and negotiate the best possible coverage for the lowest possible price. The price of coverage will always be tied to the size of the group. The annual costs will be split equally amongst each Brookstone Adviser based upon licensing. Annual costs for E&O per adviser are expected to be in the \$350-500 range per year. Each advisors portion of these costs will be deducted from commissions or fees due within the first quarter of each year. A copy of the policy and pricing is available upon request.

COMPANY BENEFITS

The following benefit information is intended to be a guideline on Brookstone Financial benefits. The Company benefits are reviewed and revised at the discretion of Brookstone Financial on an ongoing basis.

The Company benefits listed in this handbook pertain to all regular full time Brookstone Financial employees as stated in each section. Part-time, temporary, and/or contract employees are not eligible for Company benefits unless specifically stated in each section of this handbook.

The summary plan descriptions in this handbook are not intended to provide explanations of the provisions of your benefit plans. Please refer to the summary plan descriptions for additional information on the specifics of the plans. When significant changes to the plans are made, informational updates will be published. If anything in this handbook conflicts with the provisions of the plans, the terms of the plan will stay in force.

ADDITIONAL BENEFITS

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Paid Time Off	Year 1	5 days*
(PTO)	Year 2 - 4	10 days
	Year 5	11 days
	Year 6	12 days
	Year 7	13 days
	Year 8	14 days
	Year 9+	15 days
	*After completion of 1st 90 days	
Sick/Personal Days	4 Per calendar year	
40.4(1)		
401(k)	Each employee who is eligible for our	
	401(k) plan receives a fully vested	
	employer contribution equal to 3% of	
	wages. You should defer to the plan's	
	Summary Plan Description for additional	
	information about the plan.	
PAID Holidays	New Year's Day	
	Memorial Day	
	4th of July	
	Labor Day	
	Thanksgiving Day	
	Christmas Eve	
	Christmas Day	

LEAVE OF ABSENCE POLICY

It is the policy of Brookstone Financial to grant full time and part time salaried or hourly employees leaves of absence under certain circumstances in accordance with state and federal laws.

Family Medical Leave, Personal Leave, and Extended Leave may be granted to employees who have completed 52-weeks of employment with Brookstone Financial. **Military Leave** may be granted to any employee currently enlisted in the United States Military Service.

How to Apply

Employees requesting a leave of absence for a period of one week or longer must complete a leave of absence request form with their Supervisor, providing as much advance notice as possible. Supporting documentation is necessary when appropriate. All leave requests mush contain the length of leave and approximate return to work date. An employee failing to return to work at the end of an approved leave or by the maximum leave allowed based on an employee's tenure shall be considered a voluntary resignation. Employees may not request a leave for purposes of trying out a new job and anyone found working another job while on an approved leave of absence might be terminated.

All leaves are unpaid unless specifically stated. Employees may use sick pay or vacation pay during unpaid leaves.

FAMILY MEDICAL LEAVE (FMLA)

Brookstone Financial family medical leave policy runs concurrently in compliance with federal and state law.

- 1. Eligible employees are **entitled** to 12 work weeks of leave during any calendar year for any of the following reasons:
 - a. The birth of the employee's child, in order to care for the child.
 - b. The placement of a child with the employee for adoption or foster care.
 - c. To care for the employee's spouse, child, or parent who has a serious health condition; or
 - d. Due to a serious health condition that renders the employee incapable of performing the functions of his/her job.
- 2. Certification Requirements:
 - a. Birth of a Child Physician certification including date of child's birth.
 - b. Placement of a Child Court certified documentation stating intent of adoption or foster placement.
 - c. Serious Health Conditions—Family Physician certification of need for employee to care for a spouse, child, and parent, along with an estimate of the amount of time needed.
 - d. Serious Health Condition—Employee Physician certification including date serious health condition commenced, probable duration of the condition, appropriate medical facts, and that the employee is unable to perform the functions of the employee's job.
 - e. Recertification may be requested on reasonable basis.
- 3. Leave for the birth or placement of a child must be taken within 12 months following the birth or placement of the child, i.e., the leave must occur during the 12 months, not just commence before the last day of the 12th month.
- 4. Where the husband and wife both work for Brookstone Financial, a limit to a combined total of 12 weeks leave during any calendar year may be granted to both employees for the birth or placement of a child.
- 5. Employees on a medical leave of absence for their own serious health condition must avoid any activity that might aggravate the health condition and delay their return to work.
- 6. Definitions:
 - a. "Spouse" means legal spouse.
 - b. "Parent" means a biological parent or an individual who stood in loco parentis to an employee when the employee was a child.

- c. "Son" or "daughter" means a biological, adopted or foster child, a stepchild, a legal ward, or a child of a person standing in loco parentis, who is either under age 18 or over age 18 and incapable of self-care.
- d. The 12-month period is defined as a calendar year from January 1 to December 31.
- e. "Serious Health Condition" means an illness, injury, or impairment, or physical or mental condition that involves:
 - i. Inpatient care in a hospital, hospice, or residential medical care facility; or
 - ii. Any period of incapacity requiring absence from work, school, or other regular activities of more than 3 calendar days, that also involves continuing treatment by a health care provider; or
 - iii. Continuing treatment by a health care provider for a chronic or long-term health condition that is incurable or so serious that, if not treated, would likely results in a period of incapacity of more than 3 calendar days, or for prenatal care
- f. "Continuing treatment" is one or more of the following:
 - i. Treatment two or more times for the illness or injury by a health care provider or on the orders of a health care provider.
 - ii. Under continuing supervisions but not necessarily actively treated, as a result of a serious long-term or chronic conditions which cannot be cured.

Employees who need to be off more than 5 consecutive workdays must be on an approved vacation or leave of absence. All employees must notify the Office Manager regarding any leave of absence. If the employee does not return to work within the designated time allowed, a position may be held and the Company reserves the right to rehire that employee.

PERSONAL LEAVE

All eligible full time and part time employees **may be** granted an unpaid personal leave under certain circumstances up to a maximum of two weeks in a rolling 12-month period. Personal leave **may be** granted in addition to the 12 weeks provided under family medical leave. Personal leave will only be granted in weekly increments. An employee must complete a leave of absence request form to request a personal leave.

EXTENDED LEAVE

In additional to the family medical and the personal leaves, the Company offers all full time and part time employees extended leave which may be taken for the employee's serious health condition with required physician certification. This extended leave runs on a rolling 12-month period rather than calendar year period. The maximum amount allowed is 26 weeks (**inclusive** of 2-weeks personal leave and/or family/medical leave) in a rolling 12-month period.

If the employee is still unable to return to work when the maximum amount of time has been used, the Company will be unable to hold their position. An employee must contact their Supervisor to request extended leave.

BEREAVEMENT

All regular full time and part time employees who have successfully completed their 90-day trial period are allowed a total of three (3) paid days due to the death of an immediate relative as listed below:

Spouse Children Grandchildren Parents Parents-in-Law Grandparents Brother/Sister Additional unpaid time off is available under certain circumstances and must be approved by your Supervisor.

JURY DUTY

Both hourly and salary part time and full time employees who have successfully completed the 90-day trial period, can be paid up to eight (8) hours per day by Brookstone Financial when they are absent from work due to jury duty. The amount of time paid would be based on the number of hours the employee is normally scheduled to work and the number of hours they were asked to serve on jury duty.

In most situations any money received by the employee for jury duty should be signed over to Brookstone Financial. If the employee's schedule allows them to report for work before or after jury duty, they will be expected to report to work whenever it is reasonably possible (i.e. Employee reports to jury duty at 8:00 AM and is dismissed at 10:00 AM, in this case the employee should report to work for the remainder of the day.). If an employee is absent from work for less than a full day, and the per diem received is greater than their hourly rate times the number of hours absent, they may keep the per diem money and will **not** be paid by Brookstone Financial (whichever is the greater benefit to the employee). Employees must submit a copy of the original summons to jury duty issued by the court. Employees may be asked to request a postponement from the court if they are called during a particularly busy business period. Pay will be limited to two weeks maximum within a 12-month period. An employee held over on a long case may be put on an unpaid leave status.

UNPAID DAYS - HOURLY EMPLOYEES

All paid vacation and floating holiday time must be used prior to requesting an unpaid day off from work. Unpaid days may be denied for business reasons. One unpaid day off can be approved by the employees immediate Supervisor.

These rules will not apply in the event that business is slow and the Company requests employees to take unpaid time.

PERSONAL/ SICK DAYS

All eligible salaried and hourly employees can receive up to 4 personal/ sick days in each calendar year. Employees are eligible after their 90-day Probation period is complete.

RESULTS BASED PAY

Brookstone Financial may provide additional compensation for achieving Team and Personal goals. Each full-time employee is eligible for bonus after 90-days of consecutive service.