



Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC Employee Handbook



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ABOUT THIS HANDBOOK/DISCLAIMER

Welcome to **Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC** (collectively, the “Companies”). We are pleased to have you as part of our team and look forward to working together to provide exceptional care to our patients.

This Employee Handbook is designed to familiarize you with the Companies’ policies, procedures, and expectations, and to serve as a general reference regarding your employment. Employees are encouraged to read this handbook carefully and to ask questions if clarification is needed. For additional information or guidance, please contact **Dr. Koterwas** or the **Practice Manager**.

Employment Relationship (At-Will)

This Employee Handbook is **not a contract**, express or implied, and does not create any contractual rights or guarantees of employment, compensation, or benefits. Employment with the Companies is **at will**, meaning that either the employee or the Companies may terminate the employment relationship at any time, with or without cause, and with or without notice, subject to applicable law.

No statement in this handbook, nor any verbal or written communication by management, should be interpreted as altering the at-will employment relationship. Only the **Practice Manager** has the authority to enter into any agreement that modifies the at-will relationship or any term of employment, and any such modification must be **in writing and signed by both the employee and the Practice Manager**.

About This Handbook

This handbook provides general guidelines and information regarding employment with the Companies. It does not address every situation or circumstance that may arise. The Companies reserve the right to interpret, apply, modify, or discontinue any policy or practice described in this handbook at any time, with or without notice, except as required by law.

Nothing in this handbook is intended to interfere with or limit employee rights under applicable federal, state, or local law.

For information regarding employee benefits, employees should refer to the official plan documents, which govern in all cases and supersede any descriptions contained in this handbook.

Supersession

This Employee Handbook **replaces and supersedes all prior employee handbooks, policies, and manuals**, whether written or oral.

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Section 1 - Welcome & Employment Relationship

1.1 Employment At-Will Statement

Employment with **Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC** (the “Companies”) is **at will**. This means that either the employee or the Companies may terminate the employment relationship at any time, with or without cause, and with or without notice, subject to applicable law.

Nothing in this handbook, in any Company policy, or in any verbal or written statement by management creates or is intended to create a contract, promise, or guarantee of continued employment, wages, benefits, or terms and conditions of employment. No Company policy or practice alters the at-will employment relationship unless expressly stated in a **written agreement signed by both the employee and the Owner**.

The Companies reserve the right to modify, interpret, or discontinue policies, procedures, or benefits at any time, consistent with applicable law. This at-will employment relationship remains in effect throughout employment and may be changed only through a written agreement signed by authorized Company representatives.

1.2 Employment Status, Compensation & Benefits

Employment Status & Work Schedules

Full-Time Employment

For purposes of compensation and benefits eligibility, **full-time employees** are those who are regularly scheduled to work **30 or more hours per week**.

Full-time status is used to determine eligibility for certain benefits, including:

- Paid Time Off (PTO)
- Health insurance contributions
- Retirement plan contributions
- Bonuses
- Fringe benefits
- Participation in company-sponsored events and programs

Work schedules may vary based on operational needs and do not guarantee a fixed number of hours each week.

Part-Time Employment

Part-time employees are those who are regularly scheduled to work **fewer than 30 hours per week**.

Part-time employees may be eligible for certain benefits or fringe benefits as determined by company policy. Eligibility may vary depending on the specific benefit.

Work Hours and Scheduling

Work schedules are determined by the needs of the practice and may change based on patient volume, staffing levels, and operational requirements. Hours worked may fluctuate from week to week.

Compensation Philosophy

We are committed to providing **fair, competitive, and transparent compensation**. Compensation decisions are based on a combination of:

- Role responsibilities
- Experience and skills
- Performance and contribution
- Operational sustainability of the practice

Compensation is reviewed periodically and may be adjusted based on business needs, performance, and market considerations.

Total Compensation

Compensation is more than hourly wages alone. **Total compensation** reflects the full value of employment and may include:

- Hourly wages or salary
- Bonuses
- Employer retirement contributions
- Paid Time Off (PTO)
- Fringe benefits
- Health insurance contributions (when applicable)

Employees are encouraged to consider the full compensation package when evaluating their position.

Paid Time Off (PTO)

PTO Accrual

- Employees receive **24 hours of PTO front-loaded each January. For part-time employees, front-loaded PTO will be prorated based on average hours worked.**
- Employees earn **0.027 hours of PTO for every hour worked** throughout the year

PTO accrual applies to all eligible employees as defined by company policy. Accrued PTO represents paid time off and has monetary value equivalent to regular wages.

PTO Accrual for employees starting after January 1st of each year will be a straight accrual, not front-loaded. **Employees starting after January 1st will earn 0.0385 hours of PTO for every hour worked throughout the year.**

Note: PTO Accrual begins following 90 day probationary period.

Benefits Eligibility

Health Insurance

Eligible full-time employees may receive an **employer contribution toward health insurance**, subject to plan availability and enrollment requirements.

Retirement Contributions

Full-time eligible employees may receive employer retirement contributions in accordance with plan terms and company policy. **Note: Retirement Contributions begin following 90 day probationary period.**

Fringe Benefits

Fringe benefits may include, but are not limited to:

- Team lunches and meals
- Birthday celebrations
- Starbucks and employee appreciation treats
- Company-sponsored events such as holiday parties, employee retreats, and team events
- Health insurance contributions (when applicable)

Fringe benefits are not guaranteed and may change based on business needs.

Annual Review & Growth Opportunities

Compensation and performance are typically reviewed on an annual basis. As roles evolve and responsibilities increase, compensation opportunities may expand through wage adjustments, bonuses, or enhanced benefits.

Employees are encouraged to discuss professional goals, development opportunities, and growth during review conversations.

Compliance With Wage and Hour Laws

All employees, regardless of employment status, are compensated in accordance with applicable federal and Maryland wage and hour laws, including minimum wage and overtime requirements.

Changes in Employment Status

An employee's classification as full-time or part-time may change based on sustained changes in scheduled hours or business needs. Any changes that impact benefits eligibility will be communicated to the employee.

No Guarantee of Hours or Benefits

Employment status does not guarantee a specific number of hours, continued scheduling, or continued eligibility for any particular benefit. The practice reserves the right to modify schedules, benefits, and eligibility criteria in accordance with applicable laws.

Confidentiality

Information related to compensation and benefits is confidential and should not be shared or discussed outside appropriate management or HR channels.

Section 2 - Governing Principles of Employment

2.1 Introduction

Welcome to **Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC** (the “Companies”).

Whether you are joining our team for the first time or have been with us for some time, we appreciate your commitment to our practice and the care we provide to our patients. Our success depends on the dedication, professionalism, and compassion of our employees, and we value the important role each individual plays in serving our patients and supporting our operations.

We strive to maintain a workplace built on respect, integrity, teamwork, and excellence in patient care. As we continue to grow and evolve, our employees remain central to our ability to meet the needs of our patients and our community.

On behalf of the Companies, I extend my sincere thanks for your contributions and my best wishes for your continued success.

Christopher M. Koterwas, DDS

Owner

2.2 Equal Employment Opportunity

Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC (“the Company”) is committed to providing equal employment opportunities to all employees and applicants in accordance with applicable federal, state, and local laws.

The Company prohibits discrimination and harassment in all aspects of employment, including recruitment, hiring, training, promotion, compensation, benefits, scheduling, discipline, and termination.

Employment decisions are made without regard to any legally protected characteristic, including but not limited to:

- Race
- Color
- Religion (including religious beliefs and practices)
- Sex
- Pregnancy, childbirth, or related medical conditions

- Sexual orientation
- Gender identity or expression
- National origin
- Age
- Disability
- Genetic information
- Veteran or military status
- Marital status
- Status as a victim of domestic violence, sexual offense, or stalking
- Any other characteristic protected by applicable law

Reasonable Accommodations

The Company provides reasonable accommodations to qualified applicants and employees with disabilities, pregnancy-related limitations, religious practices, and other legally protected needs, unless doing so would impose an undue hardship on business operations. Accommodations are administered in accordance with the **Americans with Disabilities Act (ADA)**, the **Pregnant Workers Fairness Act (PWFA)**, and applicable Maryland law.

The Company will engage in a timely, good-faith interactive process when an accommodation is requested or when the Company becomes aware that an accommodation may be needed. Retaliation for requesting or using a reasonable accommodation is strictly prohibited.

Pregnant Workers Fairness Act (PWFA)

In accordance with the Pregnant Workers Fairness Act (PWFA), the Company provides reasonable accommodations to qualified applicants and employees for known limitations related to pregnancy, childbirth, or related medical conditions, unless doing so would impose an undue hardship. The Company prohibits discrimination or retaliation against any individual for requesting or using a pregnancy-related accommodation.

Harassment-Free Workplace

The Company is committed to maintaining a work environment free from unlawful harassment. Harassment based on any protected characteristic is prohibited and will not be tolerated. This includes verbal, physical, visual, or electronic conduct that interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment.

Non-Retaliation

The Company strictly prohibits retaliation against any employee or applicant for exercising rights protected by law, including but not limited to reporting discrimination or harassment, requesting or taking legally protected leave, requesting a reasonable accommodation, or participating in an investigation or proceeding.

Reporting Concerns

Employees who believe they have been subjected to discrimination, harassment, or retaliation should promptly report the concern to the **Practice Manager**. Reports may be made verbally or in writing. The Company will review and address concerns promptly and appropriately, consistent with applicable law.

Confidentiality and Investigations

All reports will be handled as confidentially as possible and shared only on a need-to-know basis. The Company will conduct a fair and impartial investigation and take appropriate corrective action when warranted.

Policy Enforcement

Violations of this policy may result in disciplinary action, up to and including termination. The Company reserves the right to interpret, modify, or apply this policy consistent with business needs and applicable law.

Nothing in this policy creates a contract of employment or alters the at-will employment relationship.

2.3 Reasonable Accommodations & Interactive Dialogue

Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC (“the Company”) is committed to complying with all applicable federal, state, and local laws regarding reasonable accommodations, including the Americans with Disabilities Act (ADA) and applicable Maryland law.

The Company will engage in a good-faith interactive process and provide reasonable accommodations to qualified applicants and employees, as required by law, for needs related to:

- A disability or medical condition
- Pregnancy, childbirth, or related medical conditions
- Sincerely held religious beliefs or practices
- Status as a victim of domestic violence, sexual offense, or stalking
- Any other circumstance protected by applicable law

An accommodation will not be provided if it would impose an undue hardship on business operations, as defined by law.

Requesting an Accommodation

Applicants or employees who require a reasonable accommodation should notify the **Practice Manager** as soon as practicable. Requests may be made verbally or in writing. Written requests may be submitted using a form available from the Practice Manager, but use of a specific form is not required to initiate the process.

Interactive Process

Upon receiving a request for accommodation, or when the Company becomes aware that an employee may require an accommodation, the Company will engage in a timely, good-faith interactive process to determine whether a reasonable accommodation can be provided.

The Company may initiate an interactive dialogue when it has a reasonable basis to believe an employee's work performance or conduct may be affected by a condition that could require accommodation. Initiating this dialogue does not constitute an assumption that an accommodation is needed, but rather an opportunity for the employee to request an accommodation or share information they choose to disclose.

The interactive process may occur in person, by telephone, or electronically. Where appropriate, the Company may explore alternative accommodations or reassignment options. The Company is not required to provide the specific accommodation requested if an effective, reasonable alternative is available.

Documentation and Confidentiality

The Company may request supporting documentation to the extent permitted by applicable law. All information related to accommodation requests and the interactive process will be treated as confidential and shared only on a need-to-know basis.

Non-Retaliation

The Company strictly prohibits retaliation against any individual for requesting an accommodation, participating in the interactive process, or exercising rights protected by law.

Employees with questions regarding this policy should contact the Practice Manager.

2.4 Non-Harassment

Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC (collectively, the "Companies") are committed to maintaining a professional work environment free from unlawful harassment. Harassment of applicants, employees, interns, volunteers, contractors, or any other individuals engaged with the Companies is strictly prohibited.

This policy applies to harassment by or against employees, supervisors, managers, vendors, patients, visitors, or any other third parties and is enforced regardless of intent. Harassment based on an individual's **actual or perceived protected characteristic** will not be tolerated.

Protected characteristics include, but are not limited to: race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth, and related medical conditions), gender identity or expression

(including transgender status), sexual orientation, marital status, military or veteran status, physical or mental disability, genetic information, or any other status protected by applicable federal, state, or local law.

This policy applies to conduct occurring:

- On Company premises
- While performing Company business (whether on or off Company premises)
- At Company-sponsored events
- In any situation where an individual is representing the Companies

Harassment and retaliation based on a protected characteristic may also violate federal, state, or local law.

Harassment Defined

Harassment is defined as **unwelcome verbal, visual, or physical conduct** based on a protected characteristic that:

- Unreasonably interferes with an individual's work performance, or
- Creates an intimidating, hostile, or offensive work environment

Harassment may include, but is not limited to:

- **Verbal conduct:** slurs, jokes, insults, epithets, teasing, or derogatory comments
- **Visual conduct:** offensive images, symbols, cartoons, posters, drawings, emails, text messages, social media posts, or displays
- **Physical conduct:** threats, intimidation, blocking movement, or other unwelcome physical behavior

Conduct may violate this policy even if it does not rise to the level of unlawful harassment under applicable law. Employees are expected to conduct themselves in a manner consistent with the intent and purpose of this policy at all times.

Sexual Harassment Defined

Sexual harassment is a form of prohibited harassment and includes unwelcome conduct of a sexual nature, including but not limited to sexual advances, requests for sexual favors, or other verbal, visual, or physical conduct of a sexual nature, when:

- Submission to such conduct is made explicitly or implicitly a term or condition of employment;
- Submission to or rejection of such conduct is used as the basis for employment decisions; or
- The conduct has the purpose or effect of unreasonably interfering with work performance or creating an intimidating, hostile, or offensive work environment.

Examples of conduct that may violate this policy include, but are not limited to:

- Unwelcome flirtation, leering, whistling, touching, pinching, blocking movement, or assault
 - Requests or demands for sexual favors in exchange for favorable treatment
 - Sexual jokes, comments, gestures, or remarks about a person's body or appearance
 - Sexually explicit or suggestive emails, text messages, images, or voicemails
 - Unwelcome discussions about one's own or another person's sex life
 - Conduct or comments directed at an individual because of gender, even if not sexual in nature
-

Reporting Procedure

Employees who believe they have been subjected to, or have witnessed, conduct that violates this policy should promptly report the matter to the **Practice Manager**.

If the employee is unable to contact the Practice Manager, or if the employee believes the report has not been appropriately addressed, the employee should contact the **Owner/Dentist**. If the complaint involves one of the individuals identified above, the employee may report the concern to any higher-level manager in the reporting structure.

Reports may be made verbally or in writing. Employees are encouraged to report concerns as soon as practicable so they can be addressed promptly.

Investigation Procedure

All reports of harassment or retaliation will be investigated promptly, thoroughly, and as impartially as possible. The Companies will maintain confidentiality to the extent practicable, consistent with the need to conduct a fair investigation and comply with legal obligations.

All employees are expected to cooperate fully in investigations conducted under this policy. Corrective action will be taken when appropriate.

Retaliation Prohibited

The Companies strictly prohibit retaliation against any individual who reports harassment, participates in an investigation, or exercises rights protected by law. Retaliation is a serious violation of this policy and will not be tolerated.

Any employee who believes they have been subjected to retaliation should report the matter using the same reporting procedure described above.

Policy Enforcement

Violations of this policy, including retaliatory conduct, may result in disciplinary action up to and including termination of employment. The Companies reserve the right to determine appropriate corrective action based on the circumstances and applicable law.

2.5 Drug-Free and Alcohol-Free Workplace

To promote a safe, healthy, and productive work environment; to protect employees, patients, visitors, and Company property; and to ensure efficient operations, **Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC** (collectively, the “Companies”) maintain a **drug- and alcohol-free workplace**.

This policy applies to all employees and to any individual performing work on behalf of the Companies.

Prohibited Conduct

The unlawful or unauthorized **use, abuse, possession, solicitation, theft, transfer, purchase, sale, or distribution** of alcohol, controlled substances, illegal drugs, drug paraphernalia, or any substance that may impair an individual’s ability to safely and effectively perform job duties is strictly prohibited.

This prohibition applies:

- On Company premises
- While performing Company business (whether on or off Company premises)
- While operating Company equipment
- While representing the Companies in any capacity

Employees and other covered individuals are also prohibited from reporting to work or performing work **while under the influence of alcohol, illegal drugs, or controlled substances** in a manner that impairs job performance, judgment, patient safety, or workplace safety.

Prescription Medications and Medical Marijuana

The lawful use of prescription medication pursuant to a licensed healthcare provider’s instructions is permitted **only** if the medication does not impair the individual’s ability to safely perform essential job functions or pose a safety risk to the individual, coworkers, patients, or others.

Employees must notify management if a legally prescribed medication may affect their ability to perform job duties safely. Disclosure of a specific diagnosis is not required unless permitted or required by law.

The Companies do **not** permit employees to report to work under the influence of **medical marijuana**, nor does authorization for medical marijuana use provide a defense to a positive drug test or to violations of this policy, except as required by applicable law.

Policy Violations and Discipline

Violations of this policy may result in disciplinary action, **up to and including termination of employment**, consistent with applicable law. The Companies reserve the right to determine appropriate corrective action based on the nature of the violation, safety considerations, and business needs.

Reasonable Accommodation and Non-Discrimination

The Companies comply with applicable federal and Maryland law regarding non-discrimination and reasonable accommodation. Individuals with a history of substance use disorder, or who are participating in or have completed a rehabilitation program, may be entitled to reasonable accommodation as required by law.

However, employees may **not** request an accommodation to avoid discipline for violating this policy. Employees are encouraged to seek assistance **before** substance or alcohol use affects job performance or workplace safety.

Medication Storage

Employees who bring legally prescribed medications onto Company premises are responsible for storing them securely, such as in a locked vehicle or personal container. The Companies are not responsible for lost, stolen, or misplaced personal medications.

Fitness-for-Duty Assessments

When there is a reasonable, objective basis to believe that an employee may be unable to safely perform the essential functions of their position due to impairment, the Companies may require a **fitness-for-duty evaluation**, consistent with applicable law.

Fitness-for-duty evaluations will be limited to determining whether the employee can safely perform job duties and will not seek information beyond what is permitted by law. Refusal to cooperate with a lawful fitness-for-duty request may result in disciplinary action.

Nothing in this section limits employee rights under the Americans with Disabilities Act (ADA) or applicable Maryland law.

Drug Testing

The Companies reserve the right to implement a drug-testing program at any time, in their discretion, and in accordance with applicable federal and Maryland law. Any such program may include, but is not limited to, testing based on reasonable suspicion, post-incident circumstances, or other lawful bases.

If implemented, participation in required drug testing will be a condition of employment. A positive test result, refusal to submit to testing, or tampering with a test may result in disciplinary action, up to and including termination of employment, consistent with Company policy and applicable law.

Nothing in this policy is intended to interfere with employee rights related to lawful prescription medication use, reasonable accommodation, or other protections provided by federal, state, or local law.

Policy Interpretation

Nothing in this policy is intended to interfere with employee rights under applicable federal, state, or local law, including the Americans with Disabilities Act (ADA) or Maryland employment law.

2.6 Drug, Alcohol, and Post-Arrest Policy

Purpose

To protect patient safety, maintain a professional workplace, and define employer and employee responsibilities following suspected impairment or arrest for alcohol- or drug-related offenses.

Scope

Covers all work hours, office property, company vehicles, off-site patient visits, and any work-related activity.

Definitions

- Drug: illegal controlled substances and misuse of prescription medications when use impairs job performance.
- Alcohol: any beverage or product containing ethanol.
- Impairment: observable diminished mental or physical ability to perform job duties safely or professionally.

- Reasonable suspicion: objective, contemporaneous observations supporting a belief an employee may be impaired.

Prohibited Conduct

- Possessing, using, distributing, or being under the influence of illegal drugs or alcohol while on duty, on company premises, or while providing patient care.
- Reporting to work or performing duties while impaired.
- Refusal to submit to testing required by this policy.
- Failure to notify the employer of arrest/charge as required below.

Employee Notification Requirement

- Employees must notify their supervisor or HR as soon as practicable and no later than 24 hours after being arrested for or charged with any alcohol- or drug-related offense that may affect job duties, patient safety, or the practice's reputation. Failure to notify is grounds for disciplinary action, up to termination.

Immediate Removal

- Employees arrested for or reasonably suspected of being impaired will be immediately removed from patient-facing duties and placed on unpaid administrative leave pending investigation and any required testing.

Administrative Leave (Unpaid)

- Administrative leave under this policy is unpaid. Employees may elect to use accrued paid leave (vacation/sick/paid time off) during the unpaid administrative leave; otherwise the leave remains unpaid.
- The practice will conduct an initial investigation and make a return-to-work determination within 5 business days whenever practicable. If additional time is required, the employee must provide documentation (court paperwork, treatment plan, or medical note) and request extended leave.

Testing

- Testing (breath, saliva, urine, or blood) may be required when there is reasonable suspicion, following a safety incident, or as part of return-to-work conditions. Tests will be conducted by a qualified third-party provider.
- Refusal to submit to required testing, tampering with a test, or obstructing testing is a policy violation and may result in discipline, up to termination.

Return-to-Work Conditions

- Before returning to patient-facing duties the employee must provide:
 - Documentation resolving or addressing the incident/charges when applicable; and
 - A fitness-for-duty certificate from a licensed provider; and
 - A negative drug/alcohol test if requested by the practice.
- The practice may require follow-up testing and/or a treatment plan as a condition of continued employment.

Maximum Absence and Employment Status

- If an employee is unavailable for work due to incarceration, inpatient treatment, or ongoing court requirements for more than 14 consecutive calendar days, the practice may terminate employment or treat the absence as a voluntary resignation unless otherwise required by law or mutually agreed in writing.

Refusal/Non-Compliance

- Refusal to provide required documentation, to comply with testing, or to cooperate with the investigation is grounds for disciplinary action up to and including termination.

Patient Safety Priority

- The practice will promptly remove anyone whose impairment or arrest could compromise patient safety from clinical or patient-facing duties.

Confidentiality

- Details of arrests, investigations, and test results will be kept confidential and disclosed only as required for a legitimate business need, legal requirement, or with the employee's consent.

Accommodation and Assistance

- The practice encourages employees seeking help for substance use to request assistance. Voluntary requests for help will be considered, and referrals to treatment or EAP resources may be provided. Voluntary disclosure does not guarantee protection from discipline when misconduct affecting patient safety has occurred.

Supervisor Responsibilities

- Supervisors must document and report observed signs of impairment to HR immediately, avoid medical diagnoses, and follow the investigation and removal procedures.

Documentation and Records

- All actions, leave elections, decisions, and communications will be documented and retained in the employee's confidential HR file.

Implementation and Training

- The practice will provide supervisors with basic training on recognizing impairment and documenting reasonable-suspicion observations. Employees will receive notice of the policy.

Legal Compliance

- This policy will be applied in accordance with federal, state (Maryland), and local law.

2.7 Workplace Violence

Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC (collectively, the “Companies”) are committed to maintaining a safe, secure, and respectful workplace. Violence, threats, intimidation, or aggressive behavior of any kind are inconsistent with our commitment to employee and patient safety and will not be tolerated.

The purpose of this policy is to reduce the risk of personal injury, property damage, and disruption to operations by establishing clear expectations for conduct, reporting, and response.

Employee Responsibilities

Employees are **not** expected to assess psychological conditions, confront threatening individuals, or place themselves in harm's way. Employees are **strongly discouraged** from engaging in physical confrontations or attempting to restrain or subdue any individual who appears violent or threatening.

Employees are expected to exercise reasonable judgment and promptly report behavior or situations that may pose a safety risk.

Prohibited Conduct

The Companies strictly prohibit workplace violence, including but not limited to:

- Threats or threatening language (verbal, written, electronic, or symbolic)
- Intimidation, harassment, stalking, or menacing behavior
- Physical aggression, assault, or attempted assault
- Brandishing, displaying, or using weapons

- Any conduct intended to instill fear, dominate, or intimidate others

To the extent permitted by law, **employees, patients, visitors, and vendors are prohibited from carrying weapons on Company premises or while conducting Company business**, except as required by law.

This policy applies to conduct occurring:

- On Company premises
 - While performing Company business (on or off premises)
 - At Company-sponsored events
 - During interactions with patients, vendors, or the public
-

Warning Signs and Concerning Behavior

While violence cannot always be predicted, employees should report **observable behaviors** that may indicate an increased risk, including but not limited to:

- Verbal threats or references to harming people or property
- Aggressive, intimidating, or hostile behavior
- Significant changes in behavior accompanied by agitation or loss of control
- Obsession with weapons or violent acts
- Attempts to sabotage work, equipment, or safety procedures

This list is not exhaustive. Employees should report any behavior that causes them to feel unsafe.

Reporting Procedures

All threats, acts of violence, or potentially dangerous situations must be reported **immediately** to any member of management with whom the employee feels comfortable, including the **Practice Manager or Owner/Dentist**.

If an employee believes there is an **immediate danger**, emergency services should be contacted first.

Reports will be handled as confidentially as possible, consistent with the need to investigate and respond appropriately. Employees must cooperate fully with any investigation conducted under this policy.

Investigation and Response

The Companies will promptly and thoroughly investigate all reported concerns in good faith. Appropriate corrective action will be taken when a violation of this policy is substantiated. Corrective action may include disciplinary measures, up to and including termination, and involvement of law enforcement when warranted.

Non-Retaliation

The Companies strictly prohibit retaliation against any employee who reports a concern or participates in an investigation **in good faith**. Retaliation, intimidation, or interference with reporting or investigation is a serious violation of this policy and will result in disciplinary action.

Third-Party Threats

Threats or violent behavior by patients, visitors, vendors, or other third parties must be reported immediately using the same procedures outlined above. The Companies will take appropriate steps to protect employees and others, which may include restricting access to Company premises or involving law enforcement.

Policy Enforcement

Violations of this policy may result in disciplinary action, up to and including termination of employment, consistent with applicable law. The Companies reserve the right to take any action necessary to maintain workplace safety.

2.8 Employee Concerns and Complaint Resolution Policy

The Companies encourage employees to raise questions, share concerns, and provide input to help identify and resolve workplace issues in a timely, respectful, and constructive manner. Open communication supports a positive work environment and helps ensure compliance with Company policy and applicable law.

Reporting Concerns

Employees should generally direct concerns to the appropriate individual, as outlined below:

- **Compensation or salary-related concerns** should be directed to **Dr. Koterwas**.
- **Paid Time Off (PTO) or Leave Without Pay (LWOP)** questions or requests should be directed to the employee's **supervisor**.
- Concerns involving **harassment, discrimination, retaliation, or other conduct related to protected characteristics** must be reported in accordance with the **Non-Harassment Policy** and **Equal Employment Opportunity (EEO) Policy** contained in this handbook.

Employees are not required to follow a supervisory chain if doing so would be uncomfortable or inappropriate under the circumstances.

Open-Door Policy

Employees who are uncomfortable discussing a concern with their supervisor may bring the matter directly to **Dr. Koterwas**. If a concern involves the employee's supervisor, the employee should report the issue directly to **Dr. Koterwas**.

This open-door option applies to all concerns, including those related to workplace conduct, policy interpretation, or operational issues.

Non-Retaliation

Consistent with the Companies' **EEO and Non-Retaliation policies**, no employee will be subject to retaliation for raising a concern, asking a question, making a complaint, or participating in an investigation **in good faith**.

Any employee who believes they have experienced retaliation should report the concern immediately to **Dr. Koterwas**. Retaliation in any form is prohibited and may result in disciplinary action, up to and including termination.

Confidentiality

All concerns and complaints will be handled as confidentially as possible, consistent with the need to conduct a fair and thorough review and to comply with applicable law. Confidentiality cannot be guaranteed in all circumstances.

Investigation and Response

Concerns and complaints may be raised verbally or in writing, including by email, to ensure appropriate documentation and follow-up. The Companies will acknowledge complaints within **five (5) business days** and will address concerns as promptly as practicable.

Supervisors and managers are expected to listen to employee concerns, encourage open dialogue, and attempt resolution when appropriate. Concerns involving harassment, discrimination, or retaliation will be handled in accordance with the applicable policies and investigation procedures.

Any concern that cannot be resolved at the supervisory level must be promptly escalated to **Dr. Koterwas**.

Once an issue has been reviewed through the appropriate channels and the Companies have made a final determination regarding resolution, that decision will be final. Employees may request further review if new information arises.

Employee Suggestions

The Companies value employee feedback and recognize employees as an important source of constructive ideas. Employees are encouraged to submit suggestions for improving operations, systems, or procedures to their supervisor or **Dr. Koterwas**. All suggestions will be reviewed as appropriate; however, submission of a suggestion does not guarantee implementation.

Related Policies

This policy operates in conjunction with, and should be read together with, the following sections of this handbook:

- **Equal Employment Opportunity (EEO) Policy**
- **Non-Harassment Policy**
- **Non-Retaliation Policy**
- **Reasonable Accommodation & Interactive Process Policy**
- **Time and Attendance Policy**
- **Leave and Paid Time Off Policies**

Where a concern or complaint involves issues addressed by one or more of the policies listed above, the procedures and protections outlined in those policies will apply. In the event of any inconsistency, the policy providing greater protection under applicable law will govern.

2.9 Confidentiality Policy

Dr. Koterwas Orthodontics of Calvert & Christopher M. Koterwas, DDS, LLC (collectively, the “Companies”) are committed to maintaining the highest standards of ethical conduct and confidentiality. Protecting patient information and sensitive business information is a fundamental responsibility of all individuals working on behalf of the Companies.

This policy applies to all employees, volunteers, students, interns, contractors, and any other individuals who perform work for or on behalf of the Companies (collectively referred to as “staff”).

Confidential Information

Confidential information includes, but is not limited to:

- **Patient information**, including names, contact information, medical histories, diagnoses, treatment plans, images, records, and billing information
- **Protected Health Information (PHI)** as defined by applicable law, including HIPAA
- **Business and operational information**, including financial data, employee information, vendor relationships, pricing, policies, and internal procedures

All confidential information must be protected from unauthorized access, use, or disclosure at all times.

Staff Obligations

Staff are required to safeguard all confidential information obtained through their role with the Companies and may access or use such information **only as necessary to perform their job duties**.

Patient information may be shared only:

- With the patient or the patient's authorized representative or legal guardian, as permitted by law
- With staff or external providers directly involved in the patient's care, and only to the extent necessary to support treatment, payment, or healthcare operations

Protecting patient privacy must guide all decisions regarding the use or disclosure of information.

Confidentiality Training

All employees are required to complete **confidentiality and privacy training upon hire and annually thereafter**. Failure to complete required training may result in disciplinary action.

Prohibited Disclosures and Discussions

Staff must not discuss or disclose patient or business information:

- In public or common areas (including reception areas, hallways, and waiting rooms)
- In the operatory or treatment areas unless directly related to patient care
- Outside the workplace, including with family, friends, or members of the community
- Through unauthorized electronic, social media, or digital communications

Staff must take reasonable precautions to prevent inadvertent disclosure, including safeguarding written materials, electronic devices, passwords, and computer screens.

Court Orders and Legal Requests

If a staff member receives a subpoena, court order, or other legal request for confidential patient or business information, they must **immediately notify their supervisor or the Practice Manager**. Staff must not respond to such requests unless directed to do so by the Companies after appropriate legal review.

Business Confidentiality

Information related to the Companies' business operations, employees, vendors, finances, or internal practices is confidential and may not be disclosed without proper authorization. Staff who are unsure whether information is confidential must consult their supervisor or the Practice Manager before sharing or discussing such information.

Policy Violations

Violations of this Confidentiality Policy, including unauthorized access, use, or disclosure of patient or business information, may result in disciplinary action **up to and including termination of employment**, and may also result in civil or criminal penalties as permitted by law.

Policy Acknowledgment and Enforcement

Confidentiality is a condition of employment and continued engagement with the Companies. This policy remains in effect during and after employment to the extent required by law.

Section 3 - Operational Policies

3.1 Employee Classifications

For purposes of this manual, all Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC employees fall within one of the classifications below.

Full-Time Employees - Employees who regularly work at least 36 hours per week who were not hired on a short-term basis. These employees are eligible for Companies benefits after probationary period as defined in this manual.

Part-Time Employees - Employees who regularly work fewer than 36 hours per week who were not hired on a short-term basis. Part-time employees generally are not eligible for Companies benefits, but are eligible to receive statutory benefits.

Short-Term Employees - Employees who were hired for a specific short-term project, Bootcamp Training or on a short-term freelance, per diem or temporary basis. Short-Term employees generally are not eligible for Companies benefits, but are eligible to receive statutory benefits.

In addition to the above classifications, employees are categorized as either "**exempt**" or "**non-exempt**" for purposes of federal and state wage and hour laws. Employees classified as exempt do not receive overtime pay; they generally receive the same weekly salary regardless of hours worked. Such salary may be paid less frequently than weekly. The employee will be informed of these classifications upon hire and informed of any subsequent changes to the classifications.

3.2 Trial Period

The first three months of employees' employment is an introductory period. This is an opportunity for Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC to evaluate the employee's performance. It is also an opportunity for employees to decide whether they are happy being employed by the Companies. The Companies may extend the introductory period if it desires. Completion of the introductory period does not alter the employee's at-will status. Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC will conduct a formal performance review at the end of the introductory period.

3.3 Your Employment Records

In order to obtain their position, employees have provided personal information, such as address and telephone number. This information is contained in their personnel file.

Employees should keep their personnel file up to date by informing Practice Manager of any changes. Employees also should inform Practice Manager of any specialized training or skills they acquire, as well as any changes to any required visas. Unreported changes of address, marital status, etc. can affect withholding tax and benefit coverage. Further, an "out of date" emergency contact or an inability to reach employees in a crisis could cause a severe health or safety risk or other significant problem.

It should be noted that the companies are compliant with state and federal new hire requirements and register all newly hired employees for compliance with wage garnishment and unemployment verification. Falsification of documentation will result in immediate termination.

3.4 Artificial Intelligence

The Companies recognizes that the use of artificial intelligence (AI) tools can potentially assist employees with the performance of job duties. However, there are many risks. To ensure the protection of confidential information and the integrity of our operations, as set forth below, all employees who wish to use AI tools must receive management approval and, if granted, comply with the below best practices.

Evaluation of AI tools. Employees must evaluate the utility and security of any AI tool before using it. This includes reviewing the tool's security features, terms of service, and privacy policy. Employees also should review the reputation of the tool developer and any third-party services used by the tool. But most importantly, employees must receive management approval prior to using any AI tool after explaining the manner in which it will be used and the benefits to the business.

Protection of confidential data. In using any AI tool, employees must not upload or share any confidential, proprietary, or protected data without prior written approval from the immediate manager. This includes data related to customers, employees, or partners. Similarly, employees must ensure any AI tool does not utilize confidential or copyrighted information of a third party.

Access control. Employees must not give access to any AI tools approved for business use to anyone outside the Companies without prior approval from the immediate manager and implementation of processes as required to meet security compliance requirements. This includes sharing login credentials or other sensitive information with third parties.

Compliance with security policies. Employees must apply the same security best practices we use for all Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC and customer data. This includes using strong passwords, keeping software up-to-date, and following the Companies's data retention and disposal policies.

3.5 Remote Work/Telecommuting

Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC may allow employees to work remotely if their job duties and work performance are determined to be eligible for remote work. Eligibility will be decided on a case-by-case basis by the Companies. Employees also may be required to work remotely during periods of public health emergencies if government orders and mandates recommend such work.

This policy provides general information regarding remote work/telecommuting. Employees who are approved to work remotely should consult their individual agreement for specific details of their remote work/telecommuting arrangement, such as expected work hours, equipment provided, and other important information.

Any remote work/telecommuting arrangement may be discontinued by the Companies at any time and at the discretion of the Companies. Employees also may discontinue the arrangement but may not be guaranteed office space at the Companies's location.

At-Will Employment

This policy and any individual agreement addressing this work arrangement do not create a contract of employment and are not intended to be considered or construed as a promise of continued employment. Employment is at will and may be discontinued at any time by the Companies or employee without notice, cause, or liability.

Hours of Work

Employees will work total scheduled hours from home. Scheduled hours of work will be set by the employees' manager or supervisor. Employees should maintain regular contact with their supervisors and managers.

Nonexempt employees must accurately record all hours worked pursuant to the Companies's timekeeping system and take rest and meal breaks as if in the Companies's workplace and as required by law. Nonexempt employees may not work beyond scheduled working hours (including working more than 40 hours in a workweek) without prior, **written authorization** from their manager or supervisor.

Remote Work Locations

Employees will provide, at their expense, a secure, dedicated work area. Employees are responsible for maintaining the work area in a safe, secure, and nonhazardous condition at all times. Employees will maintain security devices and procedures necessary to prevent use by unauthorized persons, including by preventing the connection of any Companies-furnished computer system, network, or database to any computer, network, or database other than a computer, network, or database to which connections are provided or authorized by the Companies.

Duties

Employees are expected to follow all existing Companies policies and procedures. The duties, obligations, responsibilities, and conditions of employment with the Companies remain unchanged. Employees must stay engaged with work throughout the workday and be fully available during normal business hours. If employees do not successfully perform their job duties remotely, this arrangement will be revoked. Employees are expected to follow existing Companies policies with respect to

scheduled and unscheduled time off, including the obligation to speak with their manager or supervisor before the scheduled start time in the event of an unscheduled absence, tardy, or early departure.

Accidents and Injuries

Employees agree to maintain safe conditions in the remote workspace and to practice the same safety habits and rules applied on Companies premises. If employees incur an injury arising out of the course and scope of the assigned job duties while working in the remote workspace, the workers' compensation provisions in place for the state in which the employees are working will apply. Employees must notify their supervisors or manager immediately and complete all necessary and/or requested documents regarding the reported injury. The Companies assumes no responsibility for injuries occurring in the remote workspace outside normal working hours or for injuries that occur as a result of a reasonably recognizable unsafe remote workspace.

Equipment

Employees agree to use electronic equipment that has been encrypted and meets all of the Companies's security requirements. If the Companies provides equipment for home use, employees agree to provide a secure location for Companies-owned equipment and will not use, or allow others to use, such equipment for purposes other than Companies business. Employees have no expectation of ownership in such equipment, linkages, property, or other items installed or provided by the Companies. The Companies will bear the expense of removal of any such equipment, linkages, and installations provided by the Companies upon the termination of the remote work/telecommuting arrangement but not modification of or repairs to the work location. Employees hereby release the Companies from any damage or liability incurred in the installation or removal of the equipment provided by the Companies.

Return of Companies Property

All equipment, records, and materials provided by the Companies will remain Companies property. Employees agree to return Companies equipment, records, and materials upon request. All Companies equipment will be returned by employees for inspection, repair, or replacement as needed or requested or immediately upon termination of the remote work/telecommuting arrangement. All equipment must be returned within five (5) business days of written notice to the employees.

Expenses

Upon presentment of receipts and in accordance with the Business Expense Reimbursement policy, the Companies will reimburse employees for certain preapproved expenses.

Regular household utility charges, such as electricity, water, phone, Internet service, auto, homeowners' insurance, etc., are not reimbursable unless state law requires reimbursement.

Confidentiality

Employees agree that they are subject to the Companies's policies prohibiting the nonbusiness use or dissemination of the Companies's confidential business information. Employees will take all appropriate steps to safeguard the Companies's confidential business information, including segregating it from personal papers and documents, not allowing nonemployees to access such information, and keeping such information in locked drawers or file cabinets when not in use. Employees will

maintain confidential information, including, but not limited to, information regarding the Companies's products or services, processing, marketing and sales, client lists, client e-mail addresses and mailing addresses, client data, orders, memoranda, notes, records, technical data, sketches, designs, plans, drawings, trade secrets, research and development data, experimental work, proposals, new product and/or service developments, project reports, sources of supply and material, operating and cost data, and corporate financial information.

Contact

If employees have any questions concerning this policy or would like to apply to work remotely, they should contact Practice Manager.

3.6 Timekeeping Procedures

This policy is intended to comply with all applicable federal, state, and local laws, including but not limited to the **Family and Medical Leave Act (FMLA)**, the **Americans with Disabilities Act (ADA)**, the **Maryland Healthy Working Families Act (HWFA)**, and Maryland wage and hour laws. Nothing in this policy is intended to interfere with, restrain, or deny any employee's rights under applicable law.

Employees are required to accurately record **all actual time worked** for payroll and benefits administration. All employees must record the time work **begins and ends**, as well as the beginning and ending time of any **non-work-related interruption** (including meal periods and personal appointments). Time records must be completed **daily** using the Company's **ADP timekeeping system**.

Scheduling and Work Hours

Work schedules are maintained through the ADP scheduling application and are subject to change based on operational needs. Schedules will generally not be finalized more than **three (3) weeks in advance**. Employees may not clock in more than **ten (10) minutes prior** to their scheduled shift unless expressly authorized or assigned to open the office.

Non-exempt employees may not perform work outside of scheduled hours without prior authorization. Unauthorized work time, early clock-ins, or remaining clocked in after a scheduled shift may result in corrective action.

Employees are expected to arrive **twenty (20) minutes prior to the start of patient appointments** to prepare for the workday. Remaining clocked in when no work is being performed is prohibited and may be considered time theft.

Time Off, Leave Requests, and Medical Appointments

All requests for time off must be submitted **in advance** through Company-designated systems and are subject to management approval.

Vacation Leave

A minimum of **eight (8) weeks' notice** is required. Vacation leave will not be approved during the **month of August** or

between **Thanksgiving and Christmas**, as communicated during onboarding and acknowledged in the Manual Acknowledgment. Requests are considered on a **first-come, first-served basis**, subject to staffing and patient care needs.

Sick and Medical Leave

Sick and medical leave will be administered in accordance with applicable federal and Maryland law, including the Maryland Healthy Working Families Act.

Medical Appointments

All scheduled doctor or medical appointments requiring time away from work must be **requested and recorded in advance through ADP**. Employees are expected to schedule such appointments **outside of peak business hours whenever practicable**. Medical appointments **may not be scheduled between 2:00 p.m. and 5:00 p.m., Monday through Friday**, unless prior approval is granted by management or as otherwise required by law.

These restrictions do **not** apply to legally protected leave, reasonable accommodations, or absences required by law. Employees requiring accommodations or protected leave should notify management so the Company may engage in the interactive process or apply applicable legal protections.

Attendance and Punctuality

Regular attendance and punctuality are essential job functions.

Excessive Tardiness or Absences

Employees who are tardy or absent **more than once per calendar quarter** may be subject to corrective action, including placement on a Performance Improvement Plan. Employees who take more than **five (5) days of Leave Without Pay** in a calendar year may be ineligible for year-end bonuses and may be subject to corrective action.

Absences or tardiness protected under federal, state, or local law will **not** be counted toward disciplinary thresholds.

Probationary Period

During the probationary period, more than **two (2)** instances of tardiness or absence may result in immediate termination, consistent with applicable law.

Call-Out Procedure

Employees who will be late or unable to report for a scheduled shift must notify **Joanne Koterwas, Practice Manager**, directly at **443-624-2650** **AND Mikee Ammay, Clinical Director, 619-480-8198** no later than **two (2) hours prior** to the scheduled start time. Calling the front desk does not satisfy this requirement and may result in corrective action.

Timekeeping Integrity

Falsifying, altering, or tampering with time records is prohibited and may result in disciplinary action up to and including termination.

Exempt employees must record daily attendance and full-day absences through ADP. Non-exempt employees may not work outside scheduled hours without authorization.

Timecard Review and Corrections

Employees are responsible for reviewing time records for accuracy.

- Timecards are finalized on the **Tuesday following the end of the pay period**.
- Errors must be reported within **twelve (12) hours** of the missed clock-in or clock-out.
- Repeated timekeeping errors may result in corrective action.

Policy Enforcement

Violations of this policy may result in disciplinary action, up to and including termination. The Company reserves the right to interpret, modify, or apply this policy based on operational needs and applicable law.

Nothing in this policy creates a contract of employment or alters the at-will employment relationship.

Note: See Also FMLA / ADA / Maryland Law Cross-Reference Policy

3.7 Overtime

When Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC experiences periods of extremely high activity, additional work may be required. Supervisors are responsible for monitoring business activity and requesting overtime work if it is necessary. Effort will be made to provide employees with adequate advance notice in such situations. Employees may work overtime only with prior management authorization. Any non-exempt employee who works overtime without authorization may be subject to disciplinary action, up to and including termination.

Any non-exempt employee who works overtime will be compensated at the rate of one and one-half times (1.5) their regular hourly wage for all time worked in excess of 40 hours each workweek, unless otherwise required by applicable law. Overtime pay is calculated based on actual hours worked. Paid time off, holidays, or any leave of absence will not be considered hours worked for purposes of performing overtime calculations. For purposes of calculating overtime for non-exempt employees, the workweek begins at 12 a.m. on Monday and ends 168 hours later at 12 a.m. on the following Monday.

3.8 Travel Time for Non-Exempt Employees

Overnight, Out-of-Town Trips

Non-exempt employees will be compensated for time spent traveling (except for meal periods) during their normal working hours, on days they are scheduled to work and on unscheduled work days (such as weekends). Non-exempt employees also

will be paid for any time spent performing job duties during otherwise non-compensable travel time; however, such work should be limited absent advance management authorization.

Out-of-Town Trips for One Day

Non-exempt employees who travel out of town for a one-day assignment will be paid for all travel time, except for, among other things: time spent traveling between the employee's home and the local railroad, bus or plane terminal; and meal periods.

Local Travel

Non-exempt employees will be compensated for time spent traveling from one job site to another job site during a workday. The trip home, however, is non-compensable when the employee goes directly home from the final job site, unless it is much longer than the regular commute home from the regular worksite. In such case, the portion of the trip home in excess of the regular commute is compensable.

Commuting Time

Under the Portal to Portal Act, travel from home to work and from work to home is generally non-compensable. If a non-exempt employee is required to travel to a worksite that is farther away than the regular worksite, whether the extra commute time is compensable will be addressed on a case-by-case basis.

If compensable travel time results in more than 40 hours worked by a non-exempt employee, the employee will be compensated at an overtime rate of one and one-half (1.5) times the regular rate.

To the extent that applicable state law provides greater benefits, state law applies.

3.9 Safe Harbor Policy for Exempt Employees

It is Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC's policy and practice to accurately compensate employees and to do so in compliance with all applicable state and federal laws. To ensure proper payment and that no improper deductions are made, employees must review pay stubs promptly to identify and report all errors.

Those classified as exempt salaried employees will receive a salary which is intended to compensate them for all hours they may work for Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC. This salary will be established at the time of hire or classification as an exempt employee. While it may be subject to review and modification from time to time, such as during salary review times, the salary will be a predetermined amount that will not be subject to deductions for variations in the quantity or quality of the work performed.

Under federal and state law, salary is subject to certain deductions. For example, unless state law requires otherwise, salary can be reduced for the following reasons:

- full-day absences for personal reasons;
- full-day absences for sickness or disability if the deduction is made in accordance with a bona fide plan, policy or practice of providing wage replacement benefits for such absences (deductions also may be made for the exempt

employee's full-day absences due to sickness or disability before the employee has qualified for the plan, policy or practice or after the employee has exhausted the leave allowance under the plan);

- full-day disciplinary suspensions for infractions of our written policies and procedures;
- Family and Medical Leave Act absences (either full- or partial-day absences);
- to offset amounts received as payment from the court for jury and witness fees or from the military as military pay;
- the first or last week of employment in the event the employee works less than a full week; and
- any full work week in which the employee does not perform any work.

Salary may also be reduced for certain types of deductions such as a portion of health, dental or life insurance premiums; state, federal or local taxes; social security; or voluntary contributions to a 401(k) or pension plan.

In any work week in which the employee performed any work, salary will not be reduced for any of the following reasons:

- partial day absences for personal reasons, sickness or disability;
- an absence because the Companies has decided to close a facility on a scheduled work day;
- absences for jury duty, attendance as a witness, or military leave in any week in which the employee performed any work (subject to any offsets as set forth above); and
- any other deductions prohibited by state or federal law.

However, unless state law provides otherwise, deductions may be made to accrued leave for full- or partial-day absences for personal reasons, sickness or disability.

If employees believe they have been subject to any improper deductions, they should immediately report the matter to a supervisor. If the supervisor is unavailable or if the employee believes it would be inappropriate to contact that person (or if the employee has not received a prompt and fully acceptable reply), they should immediately contact Dr. Koterwas or any other supervisor in Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC with whom the employee feels comfortable.

3.10 Your Paycheck

Employees will be paid bi-weekly for all the time worked during the past pay period.

Payroll stubs itemize deductions made from gross earnings. By law, Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC is required to make deductions for Social Security, federal income tax and any other appropriate taxes. These required deductions also may include any court-ordered garnishments. Payroll stubs also will differentiate between regular pay received and overtime pay received.

If there is an error in any employee's pay, the employee should bring the matter to the attention of Dr. Koterwas immediately so the Companies can resolve the matter quickly and amicably.

Paychecks will be given only to the employee, unless the employee requests that they be mailed or authorizes in writing that another person may accept the check.

3.11 Direct Deposit

Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC uses direct deposit for payroll. Authorization forms are available from Dr. Koterwas.

3.12 Salary Advances

Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC does not permit advances on paychecks or against accrued paid time off. Advance pay for vacation must be requested in writing at least six weeks prior to the vacation period.

3.13 Performance Review

Depending on the employee's position and classification, Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC endeavors to review performance annually. Employee annual reviews are conducted each spring and fall. An employee's initial annual review will correspond with their hire date but not with the actual hire date. For example, if you are a September hire, your review will be in the fall during annual reviews. Before the employee review, the employee will receive a review sheet that contains questions to be answered. The questionnaire will be returned to the Practice Manager, and a formal review will be scheduled.

Annual performance evaluations do not guarantee an increase in salary, a promotion, or continued employment. Compensation increases and the terms and conditions of employment, including job assignments, transfers, promotions, and demotions, are determined by and at the discretion of management—they are not guaranteed. It should be noted that raises and end-of-year bonuses correlate with compliance with Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC policies and procedures and job performance.

In addition to these formal performance evaluations, the Companies encourages employees and supervisors to discuss job performance on a frequent and ongoing basis.

3.14 Record Retention

Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC acknowledges its responsibility to preserve information relating to litigation, audits and investigations. Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against the Companies and its employees and possible disciplinary action against responsible individuals (up to and including discharge of the employee). Each employee has an obligation to contact the Practice Manager to inform them of potential or actual litigation, external audit, investigation or similar proceeding involving the Companies that may have an impact on record retention protocols.

3.15 Vaccination Policy: Voluntary

Vaccination Policy: Voluntary

Purpose

In accordance with Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC's duty to provide and maintain a workplace that is free of known hazards, we are adopting this policy to safeguard the health of our employees and their families; our customers and visitors; and the community at large from infectious diseases, such as COVID-19 or influenza, that may be reduced by vaccinations. This policy will comply with all applicable laws and is based on guidance from the Centers for Disease Control and Prevention and local health authorities, as applicable.

Scope

All employees are encouraged to receive vaccinations as determined by Dr. Koterwas.

Procedures

Employees will be notified by the human resources department as to the type of vaccination(s) covered by this policy and the timeframe(s) for having it/them administered. Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC will provide either onsite access to the vaccines or a list of locations to assist employees in receiving vaccines on their own.

Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC will pay for all vaccinations covered by this policy. When not received in-house, vaccinations should be run through employees' health insurance where applicable and otherwise be submitted for reimbursement.

All employees will be paid for time taken to receive vaccinations. For offsite vaccinations, employees are to work with their managers to schedule appropriate time to comply with this policy.

Employees should provide proof of vaccination before the stated deadlines to be vaccinated have expired. Employees who do not provide timely proof of vaccination will be required to wear an approved face covering at all times while in the workplace and when engaging with customers, unless an approved exemption from wearing a face covering has been provided.

Please direct any questions regarding this policy to the Practice Manager.

3.16 Cybersecurity & Technology Use

Dr. Koterwas Orthodontics of Calvert & Christopher M. Koterwas, DDS, LLC (collectively, the “Companies”) are committed to protecting patient information, business data, and technology systems from unauthorized access, misuse, loss, or disclosure. Maintaining cybersecurity is a shared responsibility and is essential to patient privacy, operational integrity, and compliance with applicable law, including HIPAA.

This policy operates in conjunction with the Confidentiality Policy, EEO Policy, and Non-Harassment Policy. All obligations under those policies apply equally to electronic, digital, and online communications.

Scope and Applicability

This policy applies to all employees, contractors, interns, volunteers, students, and any other individuals who access Company systems, devices, networks, or data (“users”).

Acceptable Technology Use

Company-owned systems, devices, software, email, internet access, and electronic records are provided for business purposes. Limited personal use may be permitted if it does not interfere with job performance, patient care, system security, or Company operations.

Users must:

- Access only systems and information necessary to perform their job duties
- Follow HIPAA privacy requirements, including the **Minimum Necessary** standard
- Protect login credentials and passwords
- Use **unique user accounts** (no shared logins)
- Lock computers and devices when unattended
- Ensure screens containing PHI are not visible to unauthorized individuals
- Use Company systems in a professional and lawful manner

The Companies reserve the right to monitor, access, and review use of Company systems to the extent permitted by law. Users should have no expectation of privacy when using Company technology.

Data Security and Protection

Users must take reasonable steps to protect electronic information, including:

- Safeguarding passwords and not sharing credentials
- Using **multi-factor authentication (MFA)** where available
- Avoiding the use of unauthorized software, apps, or devices
- Using secure networks and approved systems for Company business
- Not disabling antivirus, endpoint protection, or automatic security updates
- Reporting suspicious emails, phishing attempts, or system anomalies immediately

Confidential and protected information, including Protected Health Information (PHI), must only be accessed, transmitted, or stored using Company-approved systems and methods, consistent with the Confidentiality Policy.

PHI may not be transmitted using personal email accounts, unencrypted email, or standard SMS/text messaging. Only Company-approved secure or encrypted communication methods may be used.

Prohibited Conduct

The following activities are strictly prohibited:

- Accessing patient or business information without authorization or job-related need
 - Disabling, bypassing, or tampering with security controls
 - Downloading or installing unauthorized software or applications
 - Transmitting confidential information through unsecured or personal accounts
 - Using Company systems to engage in harassment, discrimination, or retaliation
 - Posting or sharing confidential, proprietary, or patient information online
 - Saving PHI to personal devices, personal cloud storage, or removable media without authorization
-

Social Media and Online Conduct

Employees must use caution when engaging in social media or online activities, whether during or outside of work, if such activity could affect the Companies, patients, or coworkers.

Employees may not:

- Post or share patient information, images, or identifiers

- Discuss patient care, treatment, or internal Company matters
- Represent themselves as speaking on behalf of the Companies without authorization
- Post content that violates the Companies' Confidentiality, EEO, Non-Harassment, or Workplace Violence policies

Nothing in this policy is intended to restrict lawful employee communications protected by the National Labor Relations Act (NLRA) or other applicable law.

Remote Access and Personal Devices

Use of personal devices (including phones, tablets, or laptops) to access Company systems or information must comply with Company security requirements. Users must not store PHI on personal devices or photograph PHI or patient information using personal devices.

Lost or stolen devices that may contain Company information must be reported immediately.

Reporting Cybersecurity Incidents

Any suspected or actual data breach, cybersecurity incident, lost device, phishing attempt, malware infection, or unauthorized access must be reported immediately to the Practice Manager. Prompt reporting is essential to protect patient information and limit potential harm.

Users must cooperate fully with investigations and remediation efforts.

Policy Violations (Sanctions)

Violations of this policy, the Confidentiality Policy, or related technology standards may result in corrective action up to and including termination of employment, and may also result in civil or criminal liability where applicable. The Companies maintain and enforce sanctions for workforce members who fail to comply with privacy and security requirements.

Policy Enforcement and Updates

The Companies reserve the right to update or modify technology, cybersecurity, and social media standards as necessary to address emerging risks or legal requirements. Employees will be notified of material changes as appropriate.

3.17 Corrective Action Policy

Purpose

The purpose of this policy is to promote a safe, productive, and respectful workplace by addressing performance concerns and policy violations in a fair, consistent, and timely manner. Corrective action is intended to correct behavior and improve performance; however, the Company may take corrective action, including termination, when warranted.

At-Will Employment

Employment with the Company is **at-will**. This means either the employee or the Company may end the employment relationship at any time, **with or without cause**, and **with or without notice**, subject to applicable federal, state, and local laws.

Nothing in this policy, this handbook, or any other Company document or communication creates a contract of employment or guarantees continued employment. No supervisor, manager, or representative of the Company has the authority to change the at-will employment relationship unless it is in writing and signed by an authorized Company representative.

Policy Statement

Employees are expected to meet performance standards and follow all Company policies, procedures, and workplace rules. When an employee's performance or conduct does not meet expectations, the Company may take corrective action.

Corrective action is not required to follow a set sequence and may vary depending on the situation. The Company reserves the right to determine the appropriate level of corrective action, including skipping steps when warranted.

Corrective Action Options

Depending on the nature, frequency, and severity of the issue, corrective action may include, but is not limited to:

- Coaching and counseling (informal)
- Verbal counseling (may be documented)
- Written warning
- Performance Improvement Plan (PIP)
- Retraining and/or additional supervision
- Schedule modification or reassignment of duties

- Final written warning
 - Suspension (paid or unpaid, where permitted by law and Company practice)
 - Termination of employment
-

Immediate Corrective Action

Certain conduct may result in immediate corrective action, up to and including termination, depending on the circumstances. Examples include, but are not limited to:

- Unsafe conduct or disregard of safety procedures
 - Threats, violence, harassment, bullying, or intimidation
 - Theft, dishonesty, or falsification of records
 - Insubordination or refusal to perform assigned duties
 - Working under the influence of alcohol or illegal drugs
 - Possession of weapons on Company property (unless otherwise permitted by law)
 - Serious misconduct that jeopardizes patients, staff, visitors, or Company operations
-

HIPAA / Confidentiality Violations

The Company is committed to protecting patient privacy and complying with all applicable confidentiality requirements, including the Health Insurance Portability and Accountability Act (**HIPAA**).

Any employee who accesses, uses, discloses, discusses, transmits, photographs, or shares patient information without a legitimate business need and proper authorization may be subject to corrective action, **up to and including immediate termination of employment**.

Examples of HIPAA/confidentiality violations include, but are not limited to:

- Accessing a patient record without a job-related reason (“snooping”)
- Discussing patient information in public areas or with unauthorized individuals
- Sharing patient information with family, friends, or other patients
- Posting patient-related information or images on social media (even without names, if identifiable)
- Taking photos/videos in patient care areas without authorization
- Leaving patient information unsecured or visible to unauthorized individuals

- Improper disposal of patient information (failure to use secure disposal/shredding)
- Sending patient information to the wrong recipient or through unsecured methods

Employees must immediately report any suspected or actual privacy breach or unauthorized disclosure to management. Failure to report a known or suspected privacy violation may also result in corrective action.

Corrective Action Process

When corrective action is issued, the Company may:

1. Inform the employee of the concern and the expected standard
2. Provide the employee an opportunity to respond
3. Identify expectations for improvement and a timeframe (if applicable)
4. Document the action taken and expectations going forward

Corrective action documentation may include the date(s), description of the issue, relevant policy, corrective action taken, and expectations for improvement.

Employee Acknowledgment

Employees may be asked to sign corrective action documentation. A signature confirms receipt of the document, not necessarily agreement.

If an employee refuses to sign, the Company may note the refusal and proceed.

Non-Discrimination and Non-Retaliation

Corrective action will be administered consistent with applicable federal and Maryland laws. The Company will not take corrective action based on protected characteristics and will not retaliate against employees for engaging in legally protected activity, including reporting concerns in good faith.

Management Discretion

The Company reserves the right to interpret and apply this policy and to determine the appropriate corrective action based on the circumstances, including the severity of the issue, the employee's work history, and the needs of the business. Corrective action does not alter the at-will employment relationship.

3.18 Leave Request Policy

A paid time off (PTO) policy **combines vacation, sick time, and personal time into a single bank of days for employees to use when they take paid time off.** A PTO policy creates a pool of days that an employee may use at their discretion. **A request for earned PTO leave may be denied if the employee fails to provide the required notice and the employee's absence will cause disruption to the employer.**

All leave must be documented by using the ADP app. Before requesting PTO, employees must confirm that the PTO requested is available by checking their leave balances on their current pay voucher or through the employee self-service system.

To assist with scheduling and operational requirements, all foreseeable leave must be requested at least **six weeks** before the requested leave date. Vacation leave will not be granted during August. Booking a vacation before your leave is officially approved can lead to unnecessary stress and financial loss. Work schedules can change, approvals might take time, and non-refundable bookings could leave you out of pocket. Secure your time off first—then plan your trip with peace of mind!

The employee must complete the Leave Request on ADP indicating the dates of the leave and the total hours to be taken. Leave is granted on a priority based on length of service at the Companies. While we do not like to deny leave requests, staffing must be adequate for patient care. Leave for elective appointments should be taken during non-patient days.

Unpaid Leave for Family-Friendly Purposes (LWOP)

Unpaid leave for family-friendly purposes is LWOP, which may be granted to an employee to help balance the demands of family and work. An employee may schedule and be granted up to 35 hours of LWOP in a year to:

- Attending school and early childhood educational activities directly relate to a child's educational advancement. This includes but is not limited to parent-teacher conferences, meetings with child-care providers, interviews for a new school or child-care facility, participation in volunteer activities that support a child's educational advancement, or school-sponsored activities. Employees who do not have children may request LWOP under this heading for participation in school activities deemed important to the educational advancement of a child, such as tutoring or attendance at school board meetings. School in these instances refers to elementary and secondary schools, Head Start programs, or child-care facilities;
- Accompany children to routine medical or dental appointments, such as annual checkups or vaccinations. LWOP for these purposes is in addition to an employee's entitlement to sick leave for general family care; and
- Accompany elderly relatives to routine medical or dental appointments or other professional services directly related to the care of the elderly relative. This includes, but is not limited to, making arrangements for housing, meals, phone services, banking services, and other such activities. Elderly relatives refer to an individual related by blood or marriage to the employee. LWOP, for these purposes, is in addition to an employee's entitlement to sick leave for general family care and LWOP.
- Visiting deployed military spouses who are overseas.

LWOP for general family care purposes differs from LWOP in that it is **not a positive employee entitlement** and may not be demanded by an employee. In addition, no employee has the right to substitute paid leave for unpaid leave.

Absence Without Official Leave (AWOL)

When a supervisor determines that an employee's absence from duty has not been authorized and should not be charged as approved leave or excused absence, the employee's forfeiture of pay for the period of absence is not a disciplinary action because the decision to be absent was made by the employee rather than by the supervisor. However, such periods of absence may be the basis for disciplinary action, including but not limited to compensation reviews and end-of-year bonuses.

NOTE: This policy does not override legally protected sick leave,

3.19 Personal Visits & Telephone Calls

Purpose

To ensure patient safety, protect privacy, and maintain an efficient workflow, employees must limit personal interruptions during working hours. Disruptions during work can lead to errors, delays, and decreased quality of care.

1. Personal Telephone Calls

- Personal telephone calls must be kept to a minimum.
- Employees may make or receive personal calls **only during lunch, scheduled break times, or before/after work hours**.
- Employees may not take personal calls while actively working, providing patient care, or while responsible for patients.

Emergency Exception

In the event of an emergency, employees must notify their supervisor as soon as possible and step away from patient care areas to handle the call.

2. Cell Phones

- **Cell phones are prohibited in patient care areas** due to hygiene concerns and to maintain a professional and distraction-free environment.

- Cell phones must be stored in a designated non-clinical area (example: breakroom, locker, personal storage area) and may only be used during approved break times.
-

3. Personal Guests / Visits

For safety, security, and patient privacy reasons:

- Employees may not have personal guests visit or accompany them within the facility beyond public reception areas.
 - Guests are permitted **only in reception/public areas** unless specifically approved in advance by management.
 - Personal guests are not permitted in clinical areas, staff-only areas, administrative spaces, or other restricted areas at any time.
-

4. Apple Watches / Smart Watches

- Apple Watches and smart watches are permitted in patient care areas **as long as they are not distracting** and are used appropriately.
- The following behaviors are prohibited in patient care areas:
 - Taking phone calls in the operator
 - Texting chairside
 - Any smart watch use that interferes with patient care, professionalism, or safety

Failure to follow these expectations may result in smart watches being prohibited in patient care areas.

5. Corrective Action

Violations of this policy may result in corrective action, **up to and including termination of employment**, depending on the severity and frequency of the behavior. The Company reserves the right to determine the appropriate level of corrective action based on the circumstances, including skipping steps when warranted.

Policy Statements

1. Patient Confidentiality (PHI Protection)

All Protected Health Information (**PHI**) must be kept confidential and accessed only as necessary to perform assigned job duties. Employees must follow the “**Minimum Necessary**” standard at all times.

- PHI may not be shared, discussed, or disclosed to unauthorized individuals.
- Patient information may not be accessed out of curiosity, personal interest, or for any non-work-related purpose.
- Discussions involving PHI must occur in private settings where unauthorized individuals cannot overhear.

Prohibited examples include:

- “Snooping” in patient charts
 - Discussing patient cases in hallways, reception, elevators, or public areas
 - Sharing PHI with family/friends
 - Posting any patient-related content on social media
-

2. Data Collection, Use, and Disclosure

Patient information may only be collected, used, or disclosed for legitimate purposes consistent with HIPAA and practice operations, including:

- **Treatment**
- **Payment**
- **Healthcare Operations**

Any other use or disclosure must be authorized by the patient (or legal guardian) and/or permitted by law.

3. Access Controls & Authentication

Access to Electronic Health Records (**EHR**) and patient data is restricted to authorized personnel based on role and job responsibilities.

- Employees may only access systems and records required for their duties.
- Each user must have a **unique login**; sharing accounts or passwords is strictly prohibited.
- Passwords must be strong and kept confidential.
- Passwords must never be written where they can be seen, stored in unsecured documents, or shared with others.
- Where available, **multi-factor authentication (MFA)** must be used.

Employees must log off or lock their workstation when leaving it unattended.

4. Data Storage and Transmission

All electronic patient data must be stored and transmitted securely.

Storage Requirements

- PHI must only be stored on approved, secured systems (EHR, practice management software, encrypted servers).
- Storing PHI on personal devices, personal email accounts, or unapproved cloud services is prohibited.
- Use of USB drives/external storage is prohibited unless explicitly approved by management and encrypted.

Transmission Requirements

- PHI may only be transmitted through secure, approved methods.
 - Sending PHI through unencrypted email, personal email, standard SMS/text messaging, or social media platforms is prohibited.
 - If PHI must be emailed, it must be sent using an approved secure/encrypted method.
-

5. Physical Security & Paper Records

Printed records and sensitive documents must be secured at all times.

- Paper records containing PHI must be stored in locked cabinets or restricted-access areas.
 - Documents must not be left unattended in patient areas, reception, or public view.
 - Workstations and desks must be kept tidy (“clean desk policy”) to prevent unauthorized viewing.
 - PHI must be disposed of using approved **secure shredding bins** or shredders—never placed in regular trash.
-

6. Device Security

All devices used to access practice systems or patient data must meet security requirements.

- Practice-owned devices must use passwords/PINs, antivirus protection, and security updates.
 - Personal devices may not be used to store or photograph PHI.
 - Taking photos or videos in patient care areas is prohibited unless specifically authorized for treatment purposes and stored only in approved systems.
 - Lost, stolen, or compromised devices must be reported immediately.
-

7. Employee Responsibilities & Training

All workforce members must complete privacy and security training as required.

Employees are responsible for:

- Maintaining confidentiality of patient information
- Following HIPAA and practice privacy/security procedures
- Reporting suspected violations or security incidents immediately
- Cooperating with investigations and corrective actions

Failure to complete required training may result in corrective action.

8. Incident Response & Breach Reporting

Any actual or suspected breach of privacy, unauthorized access, disclosure, or loss of patient information must be reported immediately.

Reports must be made to the designated Privacy Officer:

Privacy Officer: Practice Manager, **Joanne Koterwas**

Examples of incidents that must be reported include:

- PHI sent to the wrong patient/recipient
- Unauthorized chart access
- Lost or stolen device containing PHI
- Malware, phishing attempts, or suspicious logins
- Paper records missing or found unsecured

The practice will investigate incidents promptly and take appropriate corrective action, which may include mitigation, patient notification, reporting to authorities as required, and system/security improvements.

9. Patient Rights

Patients have rights regarding their health information consistent with HIPAA and applicable laws, including:

- The right to access their health information
- The right to request amendments/corrections
- The right to request restrictions (as permitted by law)
- The right to receive an accounting of disclosures (when applicable)
- The right to obtain a copy of the Notice of Privacy Practices

Requests must be handled according to practice procedures and HIPAA timelines.

10. Compliance

Our practices comply with all applicable federal, state, and local regulations governing privacy and data security, including HIPAA. All workforce members must comply with this policy and related privacy/security procedures.

11. Enforcement

Violations of this policy may result in corrective action, **up to and including termination of employment**, depending on severity and circumstances. Certain violations—especially those involving intentional misuse, unauthorized disclosure, or repeated noncompliance—may result in immediate termination.

Violations may also lead to civil or criminal penalties under HIPAA and other laws.

12. Acknowledgment

All employees, contractors, and individuals with access to patient data must sign an acknowledgment confirming they have read, understood, and agree to comply with this policy and all privacy/security procedures.

3.21 FMLA / ADA / Maryland Law Cross-Reference Policy

This policy is intended to operate in conjunction with all applicable federal, state, and local leave and accommodation laws, including but not limited to the Family and Medical Leave Act (FMLA), the Americans with Disabilities Act (ADA), the Maryland Healthy Working Families Act (HWFA), and Maryland wage and hour laws.

Nothing in the Time and Attendance Policy, or any related scheduling or attendance requirement, is intended to interfere with, restrain, or deny employee rights protected by law.

Family and Medical Leave Act (FMLA)

Eligible employees may be entitled to unpaid, job-protected leave for qualifying family or medical reasons under the FMLA. Absences designated as FMLA leave will not be counted toward attendance thresholds, performance plans, or disciplinary action. Employees requesting leave that may qualify for FMLA should notify management as soon as practicable so appropriate notices and documentation may be provided.

Americans with Disabilities Act (ADA)

The Company provides reasonable accommodations to qualified individuals with disabilities as required by the ADA and applicable Maryland law. Attendance policies, scheduling requirements, and medical appointment restrictions may be modified as a reasonable accommodation where required. Employees requesting an accommodation should notify management so the Company may engage in the interactive process.

Maryland Healthy Working Families Act (HWFA)

Employees may be entitled to accrue and use paid or unpaid sick and safe leave in accordance with the Maryland Healthy Working Families Act. Protected sick and safe leave under HWFA will not be counted as an attendance violation and will not result in discipline.

Maryland Wage and Hour Compliance

All time worked must be accurately recorded and paid in accordance with Maryland wage and hour law. Employees will be compensated for all hours worked, even if work was not authorized, though unauthorized work may result in corrective action.

3.22 Non-Retaliation Statement

The Company strictly prohibits retaliation against any employee for exercising rights protected by federal, state, or local law. This includes, but is not limited to, requesting or taking legally protected leave, requesting a reasonable accommodation, reporting a concern, or participating in an investigation or proceeding. Any employee who believes they have experienced retaliation should report the concern promptly to management. Retaliation in any form may result in disciplinary action, up to and including termination.

3.23 Pregnancy, Childbirth, and Related Conditions Accommodations

In accordance with applicable federal and Maryland law, including the **Pregnant Workers Fairness Act (PWFA)**, the **Americans with Disabilities Act (ADA)**, and Maryland employment law, the Company provides reasonable accommodations to qualified applicants and employees for limitations related to **pregnancy, childbirth, or related medical conditions**, unless doing so would impose an undue hardship on business operations.

Reasonable accommodations may include, but are not limited to:

- Temporary schedule modifications
- Additional or extended breaks
- Temporary reassignment of marginal job duties
- Modified workstations or seating
- Temporary light duty where available
- Leave related to pregnancy or childbirth, consistent with applicable law

Employees are encouraged to notify the **Practice Manager** as soon as practicable if an accommodation is needed. Requests may be made verbally or in writing and do not require the use of specific terminology.

The Company will engage in a timely, good-faith interactive process to determine whether a reasonable accommodation can be provided. Employees are **not required to disclose a specific diagnosis** unless permitted or required by law.

Pregnancy-related accommodations, absences, or schedule modifications that are protected by law will **not** be treated as attendance violations or grounds for discipline.

The Company strictly prohibits retaliation against any employee for requesting or using a pregnancy-related accommodation or leave.

This addendum operates in conjunction with the Company's **Reasonable Accommodation & Interactive Process Policy**, **Time and Attendance Policy**, and **Leave Policies**. Where a conflict exists, legally required protections will apply.

3.24 Office Closure, Inclement Weather & Emergency Pay Policy

1) Purpose

The purpose of this policy is to protect employee safety during hazardous conditions and to ensure consistent business decisions and payroll practices during **inclement weather, natural disasters, utility outages, or other emergencies**. This policy explains how office closure decisions are made, how employees will be notified, and when employees will be paid.

This policy applies to all employees working in Maryland.

2) Scope

This policy applies to office disruptions including, but not limited to:

- Snow, ice, severe storms, flooding, hurricanes, tornado warnings
 - Government emergency declarations or travel advisories
 - Unsafe building conditions
 - Loss of power, heat, water, internet, or building access
 - Any event management determines makes operations unsafe or impractical
-

3) Definitions

Non-Exempt Employee (Hourly): Paid based on hours actually worked; eligible for overtime.

Exempt Employee (Salaried): Paid on a salary basis under the Fair Labor Standards Act (FLSA).

Office Closure Event: A delayed opening, early closure, full closure, or shift to remote operations due to emergency conditions.

Ready, Willing, and Able: A standard used under the FLSA for exempt pay rules—meaning the employee is able to work and available to do so.

4) Authority to Close / Delay Office

The decision to **close, delay opening, close early, or shift to remote operations** will be made by **[Owner/Practice Manager/Office Administrator]**.

The company will consider:

- Weather alerts and road conditions
 - State/county advisories and emergency declarations
 - Power/internet/building conditions
 - Staffing feasibility
 - Client/patient safety and service needs
-

5) Typical Decision Timeline

When possible:

- Closure/delay decisions will be communicated by **6:00 AM** for morning operations.
 - If conditions worsen, the office may close early or change operations with little notice.
 - If utilities fail (power/internet/water/heat), the office may close immediately.
-

6) Essential Personnel vs. Non-Essential Personnel

Management may designate certain positions or employees as **Essential Personnel** based on operational needs (examples: management, reception/communications, facilities, IT, clinical/critical operations).

- Essential Personnel may be required to report to work **if conditions allow safe travel**.
- Employees will not be required to travel if they reasonably believe conditions are unsafe.
- Essential Personnel who report will be paid according to their classification (non-exempt/exempt), and overtime rules apply.

(Optional line you may include if desired: “The company may offer additional pay incentives for essential staff during emergency events at management discretion.”)

7) Notification Procedure

Employees will be notified of office status (open/delay/early closure/closed/remote) via:

- Text message

Employees are responsible for ensuring the company has their current phone number and email address.

Acknowledgment Requirement

Employees must acknowledge receipt of closure/delay notices by replying **“Received”** to the message (or otherwise confirming receipt). If no response is received, management may follow up by phone.

8) Pay Rules During Office Closures & Emergencies

A) Non-Exempt Employees (Hourly)

1. **Office closed / no work performed:**

Non-exempt employees will be paid only for hours actually worked. If the office is closed and no work is performed, time is generally unpaid unless PTO is used.

2. **Late opening / early closure:**

Employees will be paid only for hours actually worked.

3. **Remote work during closure:**

Remote work is not automatic. It must be **assigned or approved** by management.

- All time worked must be recorded accurately.
- Overtime requires advance approval.
- Off-the-clock work is strictly prohibited.

4. **Reporting Pay (Show-Up Pay):**

If a non-exempt employee reports to work as scheduled and is sent home due to closure, the employee will be paid for the **greater of**:

- actual time worked, or
- **2 hours** of pay
unless prohibited or modified by applicable law.

B) Exempt Employees (Salaried)

1. **Office closed less than a full workweek:**

Exempt employees will receive their regular salary during office closures of less than a full workweek if they are **ready, willing, and able** to work.

2. **No partial-day salary deductions:**

Salary deductions for partial-day closures or absences are not permitted under FLSA salary-basis rules.

3. **Remote work rule:**

If an exempt employee performs **any work** (including checking email, taking calls, or completing tasks), the employee must be paid their full salary for that day.

4. **Office open but exempt employee cannot report:**

If the office is open and the exempt employee chooses not to report or is unable to report for personal reasons, pay may be deducted **only for full-day absences**, consistent with FLSA rules. Partial-day salary deductions are not permitted.

C) Office Closed for One Full Workweek or Longer

If the office is closed for a **full workweek** and an exempt employee performs **no work at all** during that week, salary may not be owed for that week, consistent with FLSA requirements.

This will be reviewed case-by-case.

9) Office Open but Employee Cannot Report (Weather / Travel Safety)

The company does not require employees to travel in unsafe conditions.

If the office is open but an employee cannot report due to weather or road safety concerns:

- The employee must notify their supervisor as soon as possible.
 - The absence will be handled as follows:
 - **Non-exempt:** unpaid unless PTO is used
 - **Exempt:** PTO may be required for full-day absences; salary deductions may apply only for full-day absences consistent with FLSA
-

10) Childcare / School Closures

If the office is open but an employee cannot report due to childcare issues or school closures:

- This is considered a **voluntary absence** (not an employer-directed closure).
 - Employees may request PTO (or may be required to use PTO consistent with PTO policy).
 - If no PTO is available, time may be unpaid for non-exempt employees.
-

11) PTO Use During Weather/Disaster Closures

The company may permit or require employees to use available PTO during closures or weather-related absences.

- **Non-exempt:** PTO may be applied to missed hours.
- **Exempt:** PTO deductions may only be made in full-day increments when required by law/policy.

If an employee has insufficient PTO:

- **Non-exempt:** remaining time may be unpaid
 - **Exempt:** salary generally may not be reduced for office-closure days less than a full workweek if the employee is ready/willing/able and no full-week shutdown applies
-

12) Make-Up Time, Scheduling Changes, and Overtime

The company may require employees to work additional hours or adjust schedules to restore operations after a closure.

- **Non-exempt:** overtime will be paid for hours over 40 in a workweek.

- Employees may not work unapproved overtime.
-

13) Timekeeping Requirements

All employees must follow timekeeping rules.

- Non-exempt employees must clock in/out for all work time, including remote work.
 - Working off-the-clock is strictly prohibited.
 - Falsifying time records may result in discipline up to and including termination.
-

14) Client/Patient Scheduling and Communications (if applicable)

In the event of closure or delayed opening:

- Clients/patients will be notified via phone/text/email as soon as possible.
 - Employees should not promise rescheduling terms, refunds, or special accommodations unless authorized by management.
-

15) Emergency Contact Information and Emergency Duties

Employees must keep their contact information and emergency contact details current.

During an emergency closure, employees may be asked to assist with limited emergency tasks (examples: securing records, protecting equipment, shutdown procedures) when safe and reasonable.

16) Payroll Timing Disclaimer

If a closure disrupts payroll processing due to banking outages, internet outages, or other infrastructure interruptions, payroll may be delayed. Employees will be paid as soon as practicable.

17) Safety and Non-Retaliation

Employee safety is a priority. Employees will not be retaliated against for:

- raising good-faith safety concerns, or
- declining to travel when they reasonably believe conditions are unsafe

Employees must still follow call-out/notification procedures.

18) Compliance

This policy is intended to comply with the Fair Labor Standards Act (FLSA) and applicable Maryland wage and hour requirements. If there is a conflict between this policy and applicable law, the law will control.

3.25 Social Media & Photography Policy

Purpose

To protect patient privacy, maintain professionalism, and ensure compliance with HIPAA and other applicable privacy laws. This policy establishes clear rules regarding social media use and photography/videography within our orthodontic practices.

Scope

This policy applies to all employees, contractors, interns, temporary staff, and any individuals working on behalf of the practice, whether on-site or off-site, and whether using practice-owned or personal devices.

1. Patient Privacy & HIPAA Compliance

Patient privacy is a core obligation of employment. All Protected Health Information (**PHI**) must remain confidential and may only be accessed, used, or disclosed for legitimate business purposes.

Employees may not post, share, discuss, photograph, or record any patient-related information on social media or other platforms without explicit authorization and proper procedures.

This includes content that does not use a patient's name but could still identify the patient.

2. Photography and Video in the Workplace

Photography and video recording within the practice is strictly controlled.

Prohibited

Employees may not:

- Take photos/videos in any patient care area using personal devices
- Record patients, family members, or staff without authorization
- Photograph computer screens, schedules, charts, x-rays, or any patient documents
- Photograph “before/after” images outside of approved practice procedures
- Use any images taken at work for personal use or personal social media

Permitted (With Authorization Only)

Photos/videos may only be taken when:

- They are necessary for treatment documentation **or**
- They are approved for marketing purposes **and**
- Written patient/guardian authorization has been obtained (when required), and
- The content is captured and stored only in approved practice systems

Only authorized team members may take marketing or promotional content.

3. Social Media Rules

Employees are expected to act professionally and protect the reputation of the practice.

Employees may not post:

- Any patient information (PHI), including indirect identifiers (examples below)
- Any photos/videos taken inside the practice without management approval
- Content that references patient appointments, stories, treatment, or outcomes
- Any content that criticizes patients, coworkers, vendors, or the practice
- Any content that includes confidential business information

Indirect identifiers include:

Even without a name, PHI may include:

- Photos of a patient's face/smile/braces
- Appointment schedules or names on a screen
- A "funny story" about a patient visit
- Any mention of location/date/time that could identify the patient

If there is any chance someone could identify the patient, it is not allowed.

4. Personal Social Media Use During Work

To maintain productivity, professionalism, and privacy:

- Employees may not use social media while on the clock except during lunch or scheduled breaks
 - Social media use is prohibited in patient care areas
 - Employees may not livestream or create “behind the scenes” content inside the practice
-

5. Use of Practice Name, Branding, and Representation

Employees may not represent themselves as speaking on behalf of the practice unless authorized.

- The practice name, logo, and branding may only be used with approval
 - Employees may not create pages, accounts, or advertisements related to the practice without permission
 - Employees may not respond to patient reviews or online comments on behalf of the practice unless assigned/authorized
-

6. Staff Photos and Recordings

Employees must respect coworkers’ privacy.

- Recording coworkers without their knowledge/consent is prohibited
 - Posting coworker images or videos from the workplace without their consent is prohibited
 - Management may approve team photos for internal or marketing use
-

7. Reporting and Removal

Employees must report any suspected privacy breach, inappropriate posting, or unauthorized photography/video immediately.

If management requests removal of any content related to the practice, staff, or patients, the employee must comply immediately.

8. Enforcement

Violations of this policy may result in corrective action, **up to and including immediate termination of employment**, depending on severity.

HIPAA/privacy violations may also result in civil or criminal penalties under federal law.

9. Acknowledgment

All employees and contractors must sign an acknowledgment confirming they have read, understood, and agree to comply with this policy.

Section 4 - Benefits

4.1 Benefits Overview

In addition to good working conditions and competitive pay, it is Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC's policy to provide a combination of supplemental benefits to all eligible employees. In keeping with this goal, each benefit program has been carefully devised. These benefits include time-off benefits, such as vacations and holidays, 401k, maternity and other benefits. We are constantly studying and evaluating our benefits programs and policies to better meet present and future requirements. These policies have been developed over the years and continue to be refined to keep up with changing times and needs.

The next few pages contain a brief outline of the benefits programs Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC provides employees and their families. Of course, the information presented here is intended to serve only as guidelines.

The descriptions of benefits merely highlight certain aspects of the applicable plans for general information only. The details of those plans are spelled out in the official plan documents, which are available for review upon request from Practice Manager. Additionally, the provisions of the plans, including eligibility and benefits provisions, are summarized in the summary plan descriptions ("SPDs") for the plans (which may be revised from time to time). In the determination of benefits and all other matters under each plan, the terms of the official plan documents shall govern over the language of any descriptions of the plans, including the SPDs and this manual.

Further, Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC (including the officers and administrators who are responsible for administering the plans) retains full discretionary authority to interpret the terms of the plans, as well as full discretionary authority with regard to administrative matters arising in connection with the plans and all issues concerning benefit terms, eligibility and entitlement.

While the Companies intends to maintain these employee benefits, it reserves the absolute right to modify, amend or terminate these benefits at any time and for any reason.

If employees have any questions regarding benefits, they should contact Practice Manager.

4.2 Paid Holidays

Full-time employees will be paid for the following holidays:

- New Year's Day

- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day
- Day After Thanksgiving
- Christmas Day

When holidays fall on or are celebrated on a regular workday, eligible employees will receive one (1) day's pay at their regular straight-time rate.

Eligible employees who are required to work on a holiday will receive one (1) day's pay at their regular straight-time rate, plus additional straight-time pay for the actual hours worked on the holiday.

If a holiday falls during jury duty or bereavement leave, the eligible employee will be paid for the holiday at their regular straight-time rate in addition to the leave day, **or** may receive an additional day off at the option of the Company.

Holiday Pay Eligibility

To be eligible for holiday pay, an employee must work their regularly scheduled workday immediately **before and after** the holiday, unless the absence is pre-approved paid time off (such as vacation) or protected leave.

Employees who call in sick on the scheduled workday immediately before or immediately after a paid holiday will forfeit holiday pay for that holiday.

4.3 Lactation Accommodations

Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC will provide a reasonable amount of break time to accommodate employees desiring to express breast milk for their child, in accordance with and to the extent required by applicable law. The break time, if possible and permitted by applicable law, must run concurrently with rest and meal periods already provided. If the break time does not run concurrently with rest and meal periods already provided, the break time will be unpaid, subject to applicable law.

Companies may not be able to provide additional break time if doing so would seriously disrupt Companies's operations, subject to applicable law.

The Companies will make reasonable efforts to provide employees with the use of a room or location in close proximity to the employee's work area, other than a bathroom, to express milk in private. This location may be the employee's private office, if applicable. Please consult Practice Manager with questions regarding this policy.

Employees should advise management if they need break time and an area for this purpose. Employees will not be discriminated against or retaliated against for exercising their rights under this policy.

4.4 Workers' Compensation

On-the-job injuries are covered by Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC's Workers' Compensation Insurance Policy, which is provided at no cost. If employees are injured on the job, no matter how slightly, they should report the incident immediately to their supervisor. Failure to follow Companies procedures may affect the ability of employees to receive Workers Compensation benefits.

This is solely a monetary benefit and not a leave of absence entitlement. Employees who need to miss work due to a workplace injury must also request a formal leave of absence. See the Leave of Absence sections of this manual for more information. Due to the small size of our office, we cannot guarantee job retention in the case of extended absence from work.

4.5 Jury Duty

Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC realizes that it is the obligation of all U.S. citizens to serve on a jury when summoned to do so. All employees will be allowed time off to perform such civic service as required by law. Employees are expected, however, to provide proper notice of a request to perform jury duty and verification of their service.

Employees also are expected to keep management informed of the expected length of jury duty service and to report to work for the major portion of the day if excused by the court. If the required absence presents a serious conflict for management, employees may be asked to try to postpone jury duty.

Employees on jury duty leave will be paid for their jury duty service in accordance with state law; however, exempt employees will be paid their full salary for any week in which time is missed due to jury duty if work is performed for the Companies during such week.

4.6 Bereavement Leave

The death of a family member is a time when employees wish to be with their families. If the employee is full-time and loses a close relative, the employee will be allowed paid time off of up to 3 workdays to assist in attending to obligations and commitments. For the purposes of this policy, a "close relative" (see below) spouse, domestic/civil union partner, parent, sibling, child or any other relation required by applicable law. Paid leave days only may be taken on regularly scheduled, consecutive workdays following the day of death. Employees must inform their supervisor prior to commencing bereavement leave. In administering this policy, Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC may require verification of death.

For the purposes of bereavement leave, "close relative" includes the following relations:

1. Immediate Family:

- Spouse or domestic partner
- Parent or legal guardian
- Child (biological, adopted, foster, or stepchild)
- Sibling (biological, step, or half-sibling)

2. Extended Family:

- Grandparent or grandchild
- Parent-in-law or child-in-law
- Sibling-in-law

3. Other Considerations:

- Other individuals residing in the employee's household or for whom the employee is the primary caregiver may also be considered "close family" with prior approval from management.

4.7 Retirement Plan

Eligible employees are able to participate in Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC's retirement plan. Plan participants may make pre-tax contributions to a retirement account.

Upon becoming eligible to participate in this plan, employees will receive an SPD describing the plan in greater detail. Please refer to the SPD for detailed plan information. Of course, feel free to speak to Practice Manager if there are any further questions.

4.8 Paid Parental Leave

Paid parental benefits can be claimed by employees who have worked at Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC for at least 12 consecutive months, prior to the birth of a child. Generally, six (6) consecutive weeks of paid maternity benefits will be granted to eligible employees. This benefit is calculated (based on the following chart).

If the employee has:

One 12 months to 24 months of continuous full-time service: Payment per week is \$200/week

Over 25 months plus years of continuous full-time service: Payment per week is 50% of employee average weekly salary taken the two weeks prior to leave commencing.

This is solely a monetary benefit and not a leave of absence. Employees who will be out of work must also request a formal leave of absence. See the "Leaves of Absence" section of this manual for more information.

4.9 Profit Sharing

Profit sharing occurs upon hire at the rate of 20% per year. Employees must be vested before accessing profit-sharing dollars—the vesting period for profit-sharing is the first of the year following 5 consecutive years of hire, excluding any leave of absence.

4.10 Employee Braces

Overview

The Companies offer orthodontic treatment benefits to eligible full-time employees and their dependent children, subject to the terms outlined below. This benefit is not guaranteed and may be modified or discontinued at the Companies' discretion.

Eligibility

To qualify, the employee must:

- Be a full-time employee
- Successfully complete the probationary period
- Remain in good standing for the entire first year of employment without being written up
- Have no active performance improvement plans
- Have no attendance or disciplinary concerns

Treatment may begin **no sooner than the 30th day of the eleventh month of full-time employment.**

This benefit applies only to:

- The employee, or
- The employee's child up to age 21

No other relatives are eligible. Discounts for additional family members may be offered at the discretion of the **Practice Manager**. At no time should a staff member approach Dr. Koterwas to request treatment, appliances, or retainers until eligibility has been determined by the Practice Manager.

At no time will more than **two (2) staff members** be in active treatment simultaneously. Dr. Koterwas reserves the right to stagger treatment start dates based on operational and promotional needs.

Insurance

If the employee has private dental insurance, the case will be billed accordingly, with payments assigned to.

Financial Terms

Standard Braces

Employees must sign a treatment agreement at usual and customary rates at the time treatment begins.

As of January 2026 (subject to market adjustment):

- Standard upper and lower traditional metal braces: **\$6,290**
 - Required down payment: **\$500**
 - Remaining balance financed over approximately **18 months** (average treatment length)
-

Bracket Upgrades

Employees are responsible for 100% of any costs associated with upgraded bracket options beyond traditional metal brackets, including but not limited to:

- Clear brackets
- Champagne brackets

Upgrade pricing is subject to current market rates.

Laboratory & External Vendor Fees

Employees are responsible for 100% of all laboratory and third-party fees, including but not limited to:

- Invisalign laboratory fees
- Externally fabricated retainers
- Specialty appliances
- Any outside vendor billing

For Invisalign treatment:

- The full laboratory fee must be paid prior to treatment start
 - Average Invisalign treatment fee: **\$6,290** (subject to market adjustment)
-

Separation from Employment

If employment ends before treatment is completed:

- The employee remains responsible for the full standard treatment fee
- Insurance payments received will be credited
- The employee will receive prorated credit for months worked while in active treatment

Any remaining balance becomes immediately due under the signed treatment agreement.

Acknowledgment

Participation in this benefit requires a signed treatment agreement and acknowledgment of this policy.

The Practice reserves the right to interpret, amend, or discontinue this benefit at any time.

4.11 End-of-Year Bonuses

Christopher M. Koterwas, DDS, LLC and Koterwas Orthodontics of Calvert LLC value the contributions of their employees. Any end-of-year bonus is awarded solely at the discretion of management and does not constitute wages, earned compensation, or a promise of future payment. Bonuses are considered a discretionary gift and may be modified, prorated, or discontinued at any time, with or without notice.

Bonuses are not guaranteed, are not tied to hours worked, productivity, length of service, or any other metric, and are not included in the calculation of regular wages, overtime pay, retirement benefits, or any other employee benefits.

To be eligible for a bonus, an employee must be actively employed on the date the bonus is physically distributed. Employees who resign, are terminated, or otherwise separate from employment for any reason prior to the distribution date will not be eligible to receive a bonus, regardless of any prior communications or expectations.

End-of-year bonuses are based on the following three factors:

1. Reliability

- Consistent attendance and punctuality throughout the year.
- Adherence to company policies and timely completion of assigned tasks.
- Demonstration of accountability and dependability in work performance.

2. Length of Service

- The amount of time an employee has been with the Companies will be considered.

- Employees with longer tenures are recognized for their loyalty and continued contributions to the Companies' success.

3. Effort

- Demonstrated initiative, work ethic, and willingness to go above and beyond in daily responsibilities.
- Contribution to team morale and a positive work environment.
- Participation in company initiatives, problem-solving, and overall performance excellence.

Additional Considerations:

1. Eligibility:

- All employees in good standing are eligible for consideration for an end-of-year bonus.
- Employees who take extended unpaid leave may have bonus eligibility impacted; however, this provision does not apply to legally protected leave (including but not limited to FMLA, ADA accommodations, or state-mandated leave).
- Employees who have been subject to disciplinary action within the year may also be disqualified.

2. Bonus Amounts:

- The bonus amount is determined at the sole discretion of management, based on the company's financial performance and the factors outlined above, and bonuses are not guaranteed.

3. Timing:

- Bonuses, if awarded, will be distributed during the final pay period of the calendar year or as otherwise specified by management.

End-of-year bonuses are a way to acknowledge and reward employees for their contributions. While not guaranteed, they reflect our commitment to recognizing exceptional performance and dedication.

NOTE: Excludes legally protected leave (FMLA, ADA, etc.)

4.12 Maryland Health Exchange Health Insurance Premium Reimbursement Policy

Purpose

At Christopher M. Koterwas DDS, LLC & Koterwas Orthodontics of Calvert (further known as "The Companies"), our commitment to employee well-being includes providing access to health insurance coverage. This policy outlines the options available to employees for obtaining health insurance through the Affordable Care Act (ACA) via the Maryland Health Exchange, as well as the company's contribution toward these plans.

Eligibility:

All full-time employees of our practice are eligible to participate in the health insurance program beginning with the open enrollment period each year, starting in November. The insurance coverage will begin on January 1st of the following year.

Waiting Period:

New hires must successfully complete their probationary period to qualify for reimbursement under this policy.

Employees hired during the open enrollment period are encouraged to consider enrolling if they wish to begin receiving benefits promptly, as coverage will start after completing their probation.

Employees hired outside of the annual open enrollment will need to wait until the next enrollment cycle to sign up for benefits and receive reimbursements.

Coverage Scope

This benefit is for the employee's individual health insurance coverage only. It does not extend to coverage for family members or dependents.

Enrollment Period

- Employees may enroll in an individual health insurance plan through the Maryland Health Exchange (Maryland Health Connection) during the annual open enrollment period, which begins in November.
- Employees who choose to enroll must complete the enrollment process and select their plan within this window.

Coverage and Reimbursement

- The company recognizes the importance of accessible healthcare and will pay ****up to 50% of the monthly premium**** for the employee's individual health insurance coverage through the ACA Maryland Health Exchange.
- The reimbursement ****will not exceed \$500 per month****.
- Employees are responsible for paying the remaining premium amount, if any, directly to their insurance provider.

Reimbursement Process

- To qualify for monthly reimbursement, employees must submit a copy of their paid premium receipt for that month's coverage to Joanne Koterwas, Practice Manager, by the 5th of each month.
- Receipts should clearly indicate the paid amount, the coverage period, and the employee's name.
- Reimbursements will be processed and included in the employee's paycheck for the corresponding month.
- If an employee does not provide their receipt of payment by the 15th of the month, they will not be reimbursed for that month. The Company will not retroactively reimburse for missed receipt submissions.
- This benefit will be discontinued immediately upon the employee leaving the organization.

Additional Information

- Reimbursements are strictly for premiums paid for the employee's individual coverage through the Maryland Health Exchange; coverage for family members or dependents is not included.
- The benefit is subject to change based on the availability of funding and company policy updates.

- Employees are encouraged to review their coverage options carefully during open enrollment to select the plan that best meets their individual health needs.
- This benefit will be discontinued immediately upon the individual's departure from the Companies. No continuation or retroactive application will be granted once employment or affiliation ends.

Responsibility

Employees are responsible for completing their enrollment, paying their premiums on time, and submitting receipts promptly for reimbursement.

The Practice Manager, Joanne Koterwas, is available to assist with questions regarding enrollment or the reimbursement process.

****Note:****

Participation in this program is voluntary, and choosing not to enroll in a health insurance plan through the Maryland Health Exchange will not affect employment status. However, employees are encouraged to evaluate their health coverage options annually to ensure they maintain adequate coverage.

4.13 Maryland: Voting Leave

Employees who are eligible and registered to vote in an election and who do not have two (2) consecutive hours before or after work to vote may request up to two (2) hours with pay to vote.

Upon their return to work employees must provide proof of voting on a form prescribed by the State Board.

4.14 Maryland: Witness Leave

Employees called to serve as a witness in a judicial proceeding must notify their supervisor as soon as possible.

Employees will not be compensated for time away from work to participate in a court case, but may use available vacation and personal time to cover the period of absence.

Employees attending judicial proceedings in response to a subpoena will not be terminated for their absence.

Section 5 - Leaves of Absence

5.1 Personal Leave

If employees are ineligible for any other Companies leave of absence, Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC, under certain circumstances, may grant a personal leave of absence without pay. A written request for a personal leave should be presented to management at least eight (8) weeks before the anticipated start of the leave. If the leave is requested for medical reasons and employees are not eligible for leave under the federal Family and Medical Leave Act (FMLA) or any state leave law, medical certification must also be submitted. The request will be considered based on staffing requirements, the reasons for the requested leave, and performance and attendance records. A leave of absence will typically be granted for up to six (6) weeks. However, personal leave may be extended if, before the end of the leave, employees submit a written request for an extension to management, and the request is granted. During the leave, employees will not earn vacation, personal days, or sick days.

When the employees anticipate returning to work, they should notify management of the expected return date. This notification should be made at least one (2) weeks before the end of the leave.

Upon completion of the personal leave of absence, the Companies will attempt to return employees to their original job or a similar position, subject to prevailing business considerations. Reinstatement, however, is not guaranteed.

Failure to advise management of availability to return to work, failure to return to work when notified or a continued absence from work beyond the time approved by the Companies will be considered a voluntary resignation of employment.

5.2 Military Leave

If employees are called into active military service or enlist in the uniformed services, they will be eligible to receive an unpaid military leave of absence. To be eligible for military leave, employees must provide management with advance notice of service obligations unless they are prevented from providing such notice by military necessity or it is otherwise impossible or unreasonable to provide such notice. Provided the absence does not exceed applicable statutory limitations, employees will retain reemployment rights and accrue seniority and benefits in accordance with applicable federal and state laws. Employees should ask management for further information about eligibility for Military Leave.

If employees are required to attend yearly Reserves or National Guard duty, they can apply for an unpaid temporary military leave of absence not to exceed the number of days allowed by law (including travel). They should give management as much advance notice of their need for military leave as possible so that Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC can maintain proper coverage while employees are away.

Section 6 - General Standards of Conduct

6.1 Workplace Conduct

Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC endeavors to maintain a positive work environment. Each employee plays a role in fostering this environment. Accordingly, we all must abide by certain rules of conduct, based on honesty, common sense and fair play.

Because everyone may not have the same idea about proper workplace conduct, it is helpful to adopt and enforce rules all can follow. Unacceptable conduct may subject the offender to disciplinary action, up to and including discharge, in the Companies's sole discretion. The following are examples of some, but not all, conduct which can be considered unacceptable:

1. Obtaining employment based on false or misleading information.
2. Stealing, removing or defacing Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC property or a co-worker's property, and/or disclosure of confidential information.
3. Completing another employee's time records.
4. Violation of safety rules and policies.
5. Violation of Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC's Drug and Alcohol-Free Workplace Policy.
6. Fighting, threatening, or disrupting the work of others or other violations of Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC's Workplace Violence Policy.
7. Failure to follow lawful instructions of a supervisor.
8. Failure to perform assigned job duties.
9. Violation of the Punctuality and Attendance Policy, including but not limited to irregular attendance, habitual lateness, or unexcused absences.
10. Gambling on Companies property.
11. Willful or careless destruction or damage to Companies assets or to the equipment or possessions of another employee.
12. Wasting work materials.
13. Performing work of a personal nature during work time.
14. Violation of the Solicitation and Distribution Policy.
15. Violating Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC's Harassment or Equal Employment Opportunity Policies.
16. Violation of the Communication and Computer Systems Policy.
17. Unsatisfactory job performance.
18. Any other violation of Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC policy.

19. Unauthorized access of premises during non-business hours.

Not every type of misconduct can be listed. Note that all employees are employed at will, and Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC reserves the right to impose whatever discipline it chooses, or none at all, in a particular instance. The Companies will deal with each situation individually, and nothing in this manual should be construed as a promise of specific treatment in a given situation.

The observance of these rules will help ensure that our workplace remains safe and desirable.

6.2 Punctuality and Attendance

At Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC, employees are hired to fulfill essential functions that contribute to the success of the practice. Effective operation requires cooperation and commitment from everyone, making attendance and punctuality critical.

Unnecessary absences and tardiness disrupt workflow, increase costs, and place an unfair burden on colleagues and supervisors. Therefore, we expect all employees to maintain excellent attendance. **Excessive absenteeism or tardiness will result in disciplinary action, up to and including termination of employment.**

Unavoidable Absences or Tardiness

We understand that absences and tardiness are sometimes unavoidable. In such cases:

- Employees must notify their supervisor **as early as possible, but no later than the start of their scheduled workday.**
- Asking another employee, friend, or relative to provide this notification is prohibited and will result in disciplinary action.
- Employees must personally call their supervisor and state the nature of their absence and the expected duration each day they are out.
- If the absence due to illness extends beyond two (2) consecutive days, employees must present a doctor's note detailing the return-to-work criteria.

Unreported Absences

Failure to report an absence for two (2) consecutive workdays will generally be considered a **voluntary resignation** from employment.

Leaving a Shift Early

Leaving a scheduled shift early without prior notice and approval from a supervisor is strictly prohibited. Such actions disrupt patient care and operations. Habitual or unapproved early departures will result in disciplinary action, up to and including termination of employment.

Shift Expectations

To ensure smooth operations:

- Time is built into each shift for setup and cleanup before and after patient care hours.
- Employees are not permitted to clock in more than **10 minutes before their scheduled shift** unless they have prior approval from their supervisor.
- Employees needing additional time on the clock must submit a formal request to their supervisor in advance.

Opening Procedures

Employees assigned to open the practice must report 40 minutes before the first scheduled patient. Patterns of excessive tardiness or unplanned absences may result in corrective action, including performance improvement plans. Each situation will be evaluated based on frequency, impact on operations, and overall performance.

This policy is designed to ensure accountability, efficiency, and fairness within the workplace. Adherence to these guidelines supports a positive and productive work environment for all team members.

6.3 Use of Communications and Computer Systems

Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC's communication and computer systems are intended primarily for business purposes; however limited personal usage is permitted if it does not hinder performance of job duties or violate any other Companies policy. This includes the voice mail, e-mail and Internet systems. Users have no legitimate expectation of privacy in regard to their use of the Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC systems.

Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC may access the voice mail and e-mail systems and obtain the communications within the systems, including past voice mail and e-mail messages, without notice to users of the system, in the ordinary course of business when the Companies deems it appropriate to do so. The reasons for which the Companies may obtain such access include, but are not limited to: maintaining the system; preventing or investigating allegations of system abuse or misuse; assuring compliance with software copyright laws; complying with legal and regulatory requests for information; and ensuring that Companies operations continue appropriately during the employee's absence.

Further, Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC may review Internet usage to ensure that such use with Companies property, or communications sent via the Internet with Companies property, are appropriate. The reasons for which the Companies may review employees' use of the Internet with Companies property include, but are not limited to: maintaining the system; preventing or investigating allegations of system abuse or misuse; assuring compliance with software copyright laws; complying with legal and regulatory requests for information; and ensuring that Companies operations continue appropriately during the employee's absence.

The Companies may store electronic communications for a period of time after the communication is created. From time to time, copies of communications may be deleted.

The Companies's policies prohibiting harassment, in their entirety, apply to the use of Companies's communication and computer systems. No one may use any communication or computer system in a manner that may be construed by others as harassing or offensive based on race, national origin, sex, sexual orientation, age, disability, religious beliefs or any other characteristic protected by federal, state or local law.

Further, since the Companies's communication and computer systems are intended for business use, all employees, upon request, must inform management of any private access codes or passwords.

Unauthorized duplication of copyrighted computer software violates the law and is strictly prohibited.

No employee may access, or attempt to obtain access to, another employee's computer systems without appropriate authorization.

No employee may access or attempt to obtain access to the patient information system from home or after patient-care hours unless they are taking an emergency call.

Violators of this policy may be subject to disciplinary action, up to and including discharge.

6.4 Inspections

To the maximum extent permitted by applicable law, Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC reserves the right to require employees while on Companies property, or on client property, to agree to the inspection of their persons, personal possessions and property, personal vehicles parked on Companies or client property, and work areas. This includes lockers, vehicles, desks, cabinets, work stations, packages, handbags, briefcases and other personal possessions or places of concealment, as well as personal mail sent to the Companies or to its clients. Employees are expected to cooperate in the conduct of any search or inspection.

6.5 Smoking

Introduction

Dr. Koterwas Orthodontics, DDS, LLC & Koterwas Orthodontics of Calvert, LLC is committed to providing a safe and healthy workplace and to promoting the health and well-being of its employees. As such, the following policy has been adopted and applies to all employees of Dr. Koterwas Orthodontics, DDS, LLC & Koterwas Orthodontics of Calvert, LLC.

Policy

It is the policy of Dr. Koterwas Orthodontics, DDS, LLC & Koterwas Orthodontics of Calvert, LLC to prohibit smoking and vaping on all company premises to provide a safe and healthy work environment for all employees. Smoking is defined

as the "act of lighting, smoking or carrying a lighted or smoldering cigar, cigarette or pipe of any kind." Vaping refers to the use of electronic nicotine delivery systems or electronic smoking devices such as e-cigarettes, e-pipes, e-hookahs and e-cigars.

Scope

This policy applies to:

- All areas of buildings occupied by company employees.
- All company-sponsored offsite conferences and meetings.
- All vehicles owned or leased by the company.
- All company employees.
- All visitors (customers and vendors) to company premises.
- All contractors and consultants and/or their employees working on company premises.
- All temporary employees.
- All student interns.

Procedures

Employees who violate this policy will be subject to disciplinary action up to and including immediate discharge.

A process is in place for resolving complaints about the smoke- and vape-free policy:

- Complaints about the application of this policy should be brought to the attention of the Practice Manager for resolution.
- The complaint should be submitted in writing and should identify specific objections.
- Dr. Koterwas Orthodontics, DDS, LLC & Koterwas Orthodontics of Calvert, LLC will investigate the complaint and resolve it in accordance with the policy.

No employee shall suffer any form of retaliation for raising a complaint or asking a question about this policy.

This policy is intended to comply with the requirements of **2010 Maryland Code Health- General Title 24 § 24-205. Smoking in hospitals, nursing homes, health clinics, and physicians' offices.**

6.6 Confidential Company Information

During the course of their work, employees may have access to confidential information related to Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC, which may include, but is not limited to:

- Financial data
- Pricing information
- Details of products and new product development
- Software and computer programs
- Marketing strategies

- Information about suppliers, patients, and potential patients

Employees may also gain access to similar confidential information belonging to the Companies' patients. It is critical that all such information remains confidential and is not disclosed to competitors or any unauthorized parties.

Key Points:

1. **Confidentiality Obligation:**
 - All employees must maintain the confidentiality of the Companies' information and that of their patients.
2. **Account Access and Password Management:**
 - Employees must provide the Practice Manager with all passwords to accounts used for work purposes.
 - Any changes to passwords must be promptly communicated to the Practice Manager.
3. **Prohibited Actions:**
 - Copying, removing (physically or electronically), using, or disclosing confidential information to anyone outside the Companies is strictly forbidden.
 - Deleting or altering proprietary information without explicit permission from the Practice Manager is prohibited.
4. **Consequences:**
 - Violations of this policy may result in disciplinary action, up to and including termination of employment and could result in legal ramifications.
5. **Agreements:**
 - Employees may be required to sign a confidentiality agreement to reiterate and formalize these obligations.

Maintaining confidentiality and ensuring proper handling of proprietary information is essential to protect the Companies' business interests and uphold trust with patients and partners.

6.7 Conflict of Interest and Business Ethics

It is Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC's policy that all employees avoid any conflict between their personal interests and those of the Companies. The purpose of this policy is to ensure that the Companies's honesty and integrity, and therefore its reputation, are not compromised. The fundamental principle guiding this policy is that no employee should have, or appear to have, personal interests or relationships that actually or potentially conflict with the best interests of the Companies. Conflict of interest violations are grounds for immediate termination.

It is impossible to give an exhaustive list of situations involving violations of this policy. However, the situations that would constitute a conflict in most cases include but are not limited to:

1. holding an interest in or accepting free or discounted goods from any organization that does, or is seeking to do, business with the Companies, by any employee who is in a position to directly or indirectly influence either the Companies's decision to do business, or the terms upon which business would be done with such organization;
2. holding any interest in an organization that competes with the Companies;
3. being employed by (including as a consultant) or serving on the board of any organization which does, or is seeking to do, business with the Companies or which competes with the Companies; and/or
4. profiting personally, e.g., through commissions, loans, expense reimbursements or other payments, from any organization seeking to do business with the Companies.
5. Encouraging current employees to obtain employment outside of #Companies"

A conflict of interest would also exist when a member of the employee's immediate family is involved in situations such as those above.

This policy is not intended to prohibit the acceptance of modest courtesies, openly given and accepted as part of the usual business amenities, for example, occasional business-related meals or promotional items of nominal or minor value.

It is the employee's responsibility to report any actual or potential conflict that may exist between the employee (and the employee's immediate family) and the Companies.

6.8 Use of Facilities, Equipment and Property, Including Intellectual Property

Equipment essential in accomplishing job duties is often expensive and may be difficult to replace. When using property, employees are expected to exercise care, perform required maintenance, and follow all operating instructions, safety standards and guidelines.

Employees should notify their supervisor if any equipment, machines, or tools appear to be damaged, defective or in need of repair. Prompt reporting of loss, damages, defects and the need for repairs could prevent deterioration of equipment and possible injury to employees or others. Supervisors can answer any questions about the employees' responsibility for maintenance and care of equipment used on the job.

Employees also are prohibited from any unauthorized use of the Companies's intellectual property, such as audio and video tapes, print materials and software.

Improper, careless, negligent, destructive, or unsafe use or operation of equipment can result in discipline, up to and including discharge.

Further, the Companies is not responsible for any damage to employees' personal belongings unless the employee's supervisor provided advance approval for the employee to bring the personal property to work.

6.9 Health and Safety

The health and safety of employees and others on Companies property are of critical concern to Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC. The Companies intends to comply with all health and safety laws applicable to our business. To this end, the Companies must rely upon employees to ensure that work areas are kept safe and free of hazardous conditions. Employees are required to be conscientious about workplace safety, including proper operating methods, and recognize dangerous conditions or hazards. Any unsafe conditions or potential hazards should be reported to management immediately, even if the problem appears to be corrected. Any suspicion of a concealed danger present on the Companies's premises, or in a product, facility, piece of equipment, process, or business practice for which the Companies is responsible should be brought to the attention of management immediately.

Periodically, the Companies may issue rules and guidelines governing workplace safety and health. The Companies may also issue rules and guidelines regarding the handling and disposal of hazardous substances and waste. All employees should

familiarize themselves with these rules and guidelines as strict compliance will be expected.

Any workplace injury, accident, or illness must be reported to the employee's supervisor as soon as possible, regardless of the severity of the injury or accident.

6.10 Hiring Relatives/Employee Relationships

A familial relationship among employees can create a potential conflict of interest in the employment setting, especially where one relative supervises another relative. To avoid this problem, Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC may refuse to hire or place a relative in a position where the potential for favoritism or conflict exists.

In other cases, such as personal relationships where a conflict or the potential for conflict arises, even if there is no supervisory relationship involved, the parties may be separated by reassignment or discharged from employment, at the discretion of the Companies. Accordingly, all parties to any type of intimate personal relationship must inform management.

If two employees marry, become related, or enter into an intimate relationship, they may not remain in a reporting relationship or in positions where one individual may affect the compensation or other terms or conditions of employment of the other individual. The Companies generally will attempt to identify other available positions, but if no alternate position is available, the Companies retains the right to decide which employee will remain with the Companies.

For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

6.11 Publicity/Statements to the Media

All media inquiries seeking the Companies's official position as to any issue of the Companies must be referred to Practice Manager. Only Practice Manager is authorized to make or approve public statements on behalf of the Companies. No employees, unless specifically designated by Practice Manager, are authorized to make those statements on behalf of the Companies. Any employee wishing to write and/or publish an article, paper, or other publication on behalf of the Companies must first obtain approval from Practice Manager.

6.12 Business Expense Reimbursement

Employees will be reimbursed for reasonable approved expenses incurred in the course of business. These expenses must be approved by the employee's Supervisor, and may include air travel, hotels, motels, meals, cab fare, rental vehicles, or gas and car mileage for personal vehicles. All expenses incurred should be submitted to Dr. Koterwas along with the receipts in a timely manner.

Employees are expected to exercise restraint and good judgment when incurring expenses. Employees should contact their Supervisor in advance if they have any questions about whether an expense will be reimbursed.

6.13 References

Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC will respond to reference requests through Practice Manager Department. The Companies will provide general information concerning the employee such as date of hire, date of discharge, and positions held. Requests for reference information must be in writing, and responses will be in writing. Please refer all requests for references to Practice Manager Department.

Only Practice Manager may provide references.

6.14 If You Must Leave Us

Should any employees decide to leave the Companies, we ask that they provide a supervisor with at least 2 weeks advance notice of departure. Thoughtfulness will be appreciated. All Companies property including, but not limited to, keys, security cards, parking passes, laptop computers, fax machines, uniforms, etc., must be returned at separation. Employees also must return all the Companies's confidential information upon separation. To the extent permitted by law, employees will be required to repay the Companies (through payroll deduction, if lawful) for any lost or damaged Companies property.

6.15 Exit Interviews

Employees who resign are requested to participate in an exit interview with Practice Manager, if possible.

6.16 A Few Closing Words

This manual is intended to give employees a broad summary of things they should know about Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC. The information in this manual is general in nature and, should questions arise, any member of management should be consulted for complete details. While we intend to continue the policies, rules and benefits described in this manual, Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC, in its sole discretion, may always amend, add to, delete from or modify the provisions of this manual and/or change its interpretation of any provision set forth in this manual. Employees should not hesitate to speak to management if they have any questions about the Companies or its personnel policies and practices.

6.17 Social Media Policy

Purpose

The Companies recognize that social media can be a fun and rewarding way to communicate and share information. However, social media use also creates risks related to patient privacy, confidentiality, professionalism, and the Companies' reputation. This policy provides guidelines for appropriate social media and online conduct.

Scope

This policy applies to all employees, contractors, interns, volunteers, students, temporary staff, and any individual working on behalf of the Companies ("employees"), whether posting during or outside work hours, and whether using Company-owned or personal devices.

Policy Guidelines

1. Professionalism and Responsibility

Employees are personally responsible for what they post online. Online content may be permanent, searchable, and easily shared outside the intended audience.

Employees must ensure that their online conduct does not:

- Interfere with job performance or patient care
 - Harm coworker relationships or workplace culture
 - Damage patient trust or the Companies' reputation
 - Violate Company policies or applicable laws
-

2. Patient Privacy / HIPAA (Strict Prohibition)

Protecting patient privacy is required at all times.

Employees may **never** post, share, text, message, livestream, or otherwise disclose any patient information or content that includes or relates to a patient.

This includes any:

- Names, photos, videos, or voice recordings

- Treatment details, stories, or “funny patient moments”
- Appointment details or identifiable time/location information
- Images of charts, schedules, x-rays, computer screens, paperwork, or consent forms

Important: Even if a patient’s name is not included, content may still be considered PHI if the patient can be identified.

Employees may not take patient photos/videos on personal devices at any time.

3. Photography & Video Recording in the Workplace

To protect privacy, safety, and professionalism:

Employees may not:

- Take photos/videos in patient care areas using personal devices
- Photograph computer screens, schedules, patient charts, or x-rays
- Record patients, families, or staff without explicit authorization
- Post “behind the scenes” content inside the practice without approval
- Livestream on any platform while on Company property

Only authorized personnel may take photos/videos for marketing or educational purposes, and only:

- With management approval, and
 - With appropriate written patient/guardian authorization when required, and
 - Using Company-approved equipment and storage systems
-

4. Confidentiality (Business Information)

Employees must not share confidential or proprietary Company information, including:

- Internal schedules, staffing issues, policies, procedures, or training documents
- Financial information, pricing, or vendor contracts
- Security procedures or system details
- Internal disputes, investigations, or HR matters

If information should not be shared with the public, it should not be posted online.

5. Respectful Workplace Conduct

Employees must be respectful and professional online.

Online conduct may not include:

- Harassment, discrimination, bullying, stalking, threats, or intimidation
- Malicious, obscene, or offensive content directed at coworkers, patients, vendors, or competitors
- Statements that could reasonably create a hostile work environment

Employees are encouraged to address workplace concerns through appropriate internal channels rather than through social media.

6. Representation of the Companies

Employees may not represent themselves as speaking on behalf of the Companies unless authorized.

Employees may not:

- Create social media accounts, pages, or groups using the Companies' name/logo without approval
- Respond to patient reviews or media inquiries unless authorized
- Use Company branding without permission

If employees mention the Companies online, they should make clear they are speaking personally and not for the Companies. A recommended disclaimer is:

"The views expressed are my own and do not necessarily reflect the views of my employer."

7. Social Media Use During Work Time

Employees may not use social media during working time except for business-related purposes authorized by management.

- Social media use is prohibited in patient care areas
 - Employees may not use Company email addresses to create personal social media accounts
-

8. Reporting Concerns

Employees must immediately report:

- Suspected HIPAA/privacy violations
- Unauthorized photos/videos taken in the workplace
- Social media posts that may involve patients or confidential information
- Harassment or threats made online involving the workplace

Reports should be made to the Practice Manager.

9. Media Inquiries

Employees may not speak to the media on behalf of the Companies unless authorized.

All media inquiries must be directed to the **Practice Manager**.

10. Legal Rights (NLRA Notice)

Nothing in this policy is intended to restrict or interfere with employee rights under the **National Labor Relations Act (NLRA)** or other applicable laws, including lawful communications about wages, hours, or working conditions.

11. Enforcement

Violations of this policy may result in corrective action, **up to and including termination of employment**, depending on the severity and circumstances. HIPAA/privacy violations may also result in civil or criminal penalties.

Questions

Employees with questions about this policy or appropriate online conduct should contact the Practice Manager before posting.

6.18 Job Abandonment Policy

Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert, LLC expects employees to report for work on time for every scheduled shift. An employee who is unable to report to work at the designated time is required to notify their supervisor as soon as practicable but no later than the employee's scheduled start time in accordance with the sick leave policy. Employees who fail to report to work for three consecutive business days without notifying the company of the

If the employee is unable to contact the company for any absence, he or she should ask a representative (such as a family member or friend) to do so on the employee's behalf. If the employee or a representative is unable to contact ##Company33 due to extreme circumstances (such as a medical emergency or natural disaster that prohibits the employee or his or her representative from contacting the company within three days), the employee or his or her representative must contact the company as soon as practicable to explain the situation. In extreme circumstances, the employer will consider the explanation and its timing before determining if the voluntary resignation will be upheld.

6.19 Diversity, Equity and Inclusion Policy

Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert, LLC is committed to fostering, cultivating and preserving a culture of diversity, equity and inclusion.

Our human capital is the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation and company's achievement as well.

We embrace and encourage our employees' differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make our employees unique.

[Company Name's] diversity initiatives are applicable—but not limited—to our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; layoffs; terminations; and the ongoing development of a work environment built on the premise of gender and diversity equity that encourages and enforces:

- Respectful communication and cooperation between all employees.
- Teamwork and employee participation, permitting the representation of all groups and employee perspectives.
- Work/life balance through flexible work schedules to accommodate employees' varying needs.
- Employer and employee contributions to the communities we serve to promote a greater understanding and respect for the diversity.

All employees of Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert, LLC have a responsibility to treat others with dignity and respect at all times. All employees are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site, and at all other company-sponsored and participative events. All employees are also required to attend and complete annual diversity awareness training to enhance their knowledge to fulfill this responsibility.

Any employee found to have exhibited any inappropriate conduct or behavior against others may be subject to disciplinary action.

Employees who believe they have been subjected to any kind of discrimination that conflicts with the company's diversity policy and initiatives should seek assistance from a supervisor or an HR representative.

6.20 Emergency Evacuation Procedures

Stop your work

In all emergency or drills, when the alarm sounds, all employees should immediately stop whatever they are doing and quickly, yet safely, exit the building using the nearest safe stairwell. All doors should be closed behind employees, but not locked. **Do not use elevators.**

Leave the building

Exit the building on the ground floor and quickly proceed away from the building. In the Prince Frederick Office, employees will gather by the mailboxes in the parking lot. In the St. Mary's Office, employees will gather in the parking lot by employee parking. The street must be kept clear at all times, so as not to hamper the movement of emergency vehicles into the area.

Check-in with Dr. Koterwas

Dr. Koterwas or the Practice Manager is responsible to see that all employees leave the building promptly and safely, including employees with disabilities who may need assistance during an evacuation.

Wait for further instruction

Dr. Koterwas is responsible for calling 911 and will act as the designated contact for emergency responders on-site.

Any missing persons will be reported to Dr. Koterwas or emergency responders.

Staff members trained in CPR and rescue breathing should survey the individuals outside to determine if anyone needs first aid. Appropriate aid should then be given.

Employees may not re-enter the building until it is declared safe by the fire department and Dr. Koterwas has authorized re-entry.

6.21 Infectious Disease Control Policy

Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert, LLC will take proactive steps to protect the workplace in the event of an infectious disease outbreak. It is the goal of Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert, LLC during any such time period to strive to operate effectively and ensure that all essential services are continuously provided and that employees are safe within the workplace.

Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert, LLC is committed to providing authoritative information about the nature and spread of infectious diseases, including symptoms and signs to watch for, as well as required steps to be taken in the event of an illness or outbreak.

Preventing the Spread of Infection in the Workplace

Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert, LLC will ensure a clean workplace, including the regular cleaning of objects and areas that are frequently used, such as bathrooms, break rooms, conference rooms, door handles and railings. A committee will be designated to monitor and coordinate events around an infectious disease outbreak, as well as to create work rules that could be implemented to promote safety through infection control.

We ask all employees to cooperate in taking steps to reduce the transmission of infectious disease in the workplace. The best strategy remains the most obvious—frequent hand washing with warm, soapy water; covering your mouth whenever you sneeze or cough; and discarding used tissues in wastebaskets. We will also install alcohol-based hand sanitizers throughout the workplace and in common areas.

Unless otherwise notified, our normal attendance and leave policies will remain in place. Individuals who believe they may face particular challenges reporting to work during an infectious disease outbreak should take steps to develop any necessary contingency plans. For example, employees might want to arrange for alternative sources of child care should schools close and/or speak with supervisors about the potential to work from home temporarily or on an alternative work schedule.

Limiting Travel

All nonessential travel should be avoided until further notice. Employees who travel as an essential part of their job should consult with management on appropriate actions. Business-related travel outside the United States will not be authorized until further notice.

Employees should avoid crowded public transportation when possible. Alternative scheduling options, ride-share resources and/or parking assistance will be provided on a case-by-case basis. Contact human resources for more information.

Staying Home When Ill

Many times, with the best of intentions, employees report to work even though they feel ill. We provide paid sick time and other benefits to compensate employees who are unable to work due to illness. [Insert any specific policy guidance here].

During an infectious disease outbreak, it is critical that employees do not report to work while they are ill and/or experiencing the following symptoms: [Enter as warranted. Examples include fever, cough, sore throat, runny or stuffy nose, body aches, headache, chills and fatigue]. Currently, the Centers for Disease Control and Prevention recommends that people with an infectious illness such as the flu remain at home until at least 24 hours after they are free of fever (100 degrees F) or signs of a fever without the use of fever-reducing medications. Employees who report to work ill will be sent home in accordance with these health guidelines.

Requests for Medical Information and/or Documentation

If you are out sick or show symptoms of being ill, it may become necessary to request information from you and/or your health care provider. In general, we would request medical information to confirm your need to be absent, to show whether and how an absence relates to the infection, and to know that it is appropriate for you to return to work. As always, we expect and appreciate your cooperation if and when medical information is sought.

Confidentiality of Medical Information

Our policy is to treat any medical information as a confidential medical record. In furtherance of this policy, any disclosure of medical information is in limited circumstances with supervisors, managers, first aid and safety personnel, and government officials as required by law.

Social Distancing Guidelines for Workplace Infectious Disease Outbreaks

In the event of an infectious disease outbreak, Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert, LLC may implement these social distancing guidelines to minimize the spread of the disease among the staff.

During the workday, employees are requested to:

1. Do not congregate in work rooms, pantries, or other areas where people socialize.
2. Bring lunch and eat at your desk, in your car or at outdoor dining tables provided.
3. Wear a Level 3 mask inside the office at all times (masks provided).

Outside activities

Employees might be encouraged to the extent possible to:

1. Avoid public transportation (walk, cycle, drive a car) or go early or late to avoid rush-hour crowding on public transportation.
2. Avoid recreational or other leisure classes, meetings, activities, etc., where employees might come into contact with contagious people.

Post Vaccination

14 days following the second dose of vaccine employees who are vaccinated will be able to return to eating lunch together and having employee development, training and parties without masks. When outsiders are in the office masks must be worn 100% of the time. Any employee declining the vaccine must remain masked and follow the above guidelines indefinitely.

6.22 Workplace Bullying Policy

The purpose of this policy is to communicate to all employees, including supervisors, managers and executives, that Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert will not *in any instance* tolerate bullying behavior. Employees found in violation of this policy will be disciplined, up to and including termination.

Definition

Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert defines bullying as repeated, health-harming mistreatment of one or more people by one or more perpetrators. It is abusive conduct that includes:

- Threatening, humiliating or intimidating behaviors.
- Work interference/sabotage that prevents work from getting done.

- Verbal abuse.

Such behavior violates Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert 's Code of Ethics, which clearly states that all employees will be treated with dignity and respect.

Examples

Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert considers the following types of behavior examples of bullying:

- **Verbal bullying.** Slandering, ridiculing or maligning a person or his or her family; persistent name-calling that is hurtful, insulting or humiliating; using a person as the butt of jokes; abusive and offensive remarks.
- **Physical bullying.** Pushing, shoving, kicking, poking, tripping, assault or threat of physical assault, damage to a person's work area or property.
- **Gesture bullying.** Nonverbal gestures that can convey threatening messages.
- **Exclusion.** Socially or physically excluding or disregarding a person in work-related activities.

In addition, the following examples may constitute or contribute to evidence of bullying in the workplace:

- Persistent singling out of one person.
- Shouting or raising one's voice at an individual in public or in private.
- Using obscene or intimidating gestures.
- Not allowing the person to speak or express himself or herself (i.e., ignoring or interrupting).
- Personal insults and use of offensive nicknames.
- Public humiliation in any form.
- Constant criticism on matters unrelated or minimally related to the person's job performance or description.
- Public reprimands.
- Repeatedly accusing someone of errors that cannot be documented.
- Deliberately interfering with mail and other communications.
- Spreading rumors and gossip regarding individuals.
- Encouraging others to disregard a supervisor's instructions.
- Manipulating the ability of someone to do his or her work (e.g., overloading, underloading, withholding information, setting deadlines that cannot be met, giving deliberately ambiguous instructions).
- Assigning menial tasks not in keeping with the normal responsibilities of the job.
- Taking credit for another person's ideas.
- Refusing reasonable requests for leave in the absence of work-related reasons not to grant leave.
- Deliberately excluding an individual or isolating him or her from work-related activities, such as meetings.
- Unwanted physical contact, physical abuse or threats of abuse to an individual or an individual's property (defacing or marking up property).

Individuals who feel they have experienced bullying should report this to the Practice Manager before the conduct becomes severe or pervasive. All employees are strongly encouraged to report any bullying conduct they experience or witness as soon as possible to allow Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert to take appropriate action.

6.23 Adverse Weather Conditions Policy

It is the policy of Christoph M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert, LLC to remain open during most periods of inclement weather; however, where extraordinary circumstances warrant, the company reserves the right to close the facility.

Procedures

Christoph M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert, LLC will make a decision by 6:30 a.m. whether the facilities will be open or closed during periods of inclement weather and will send a text message to employees to inform them of the closure/delay.

Regardless of whether the facility is open or closed, it is each employee's decision as to whether it is safe to report to work during such weather. Employees must advise their manager or supervisor as soon as possible if they are unable to report to work due to inclement weather.

Facility Closed

If the facility is announced to be closed on a given day, all exempt level staff will receive their regular pay for the day of closure. For hourly employees on a day of closure, an employee will receive an amount equivalent to four hours of base pay for the day.

Facility Open

If the facility remains open on an adverse weather day, employees who report to work will receive their normal pay for the day, i.e., exempt staff will receive their regular salary and hourly employees will be paid at their base rate plus incentives for all hours worked. If an employee elects not to report to work when facilities are open day, the employee will be required to use his or her available paid time off or take leave without pay.

6.24 Student Loan Assistance Policy

Objective

The objective of this policy is to assist in repaying student loan debt to further the financial well-being of employees.

Policy

The student loan assistance program provides eligible employees up to \$100 per month paid directly to the employee's student loan servicer. Employees are expected to continue to make minimum monthly payments to the loan servicer in addition to the assistance provided under this policy. Student loan assistance is determined on an as need basis and might be considered taxable income on the employee's W-2.

Eligibility

Eligible employees include full-time employees who have received a graduate or undergraduate degree within 3 months of the date the employee first applies for assistance under this policy. New employees are eligible after 12 months of continuous employment with Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert, LLC.

Student loan assistance payments will cease for employees on a scheduled or unscheduled leave of absence.

Loans eligible for repayment assistance include U.S.-based education loans borrowed by the employee for the employee's own education.

Procedures

Eligible employees must complete a student loan assistance application and provide proof of graduation documentation and loan documentation. Loan documentation must include:

- Employee's name.
- Loan servicer's name.
- Loan account number.
- Current balance.
- Required monthly payment amount.
- Monthly payment due date.

The amount of student loan assistance paid to the loan servicer each month will be the employee's minimum monthly payment or \$100, whichever is less.

Student loan assistance payments will begin on the 1st of the month following receipt and approval of a completed application. Employees will receive written notice of approval or denial of the loan assistance application.

Termination

Loan assistance payments will cease immediately upon an employee's voluntary or involuntary termination from employment with Christopher M. Koterwas, DDS, LLC or Koterwas Orthodontics of Calvert, LLC or change in eligibility status, such as a reduction to part-time hours.

6.25 Computer Password Policy

Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC (“Companies”)

Objective

Passwords and authentication controls are critical to protecting Company systems, business data, and patient information (including PHI). Passwords are the first line of defense for user accounts. Weak or compromised passwords may result in unauthorized access, data loss, HIPAA violations, operational disruption, and financial harm.

This policy establishes minimum standards for creating strong passwords, protecting passwords, using multi-factor authentication (MFA), and managing password changes and account access.

Scope

This policy applies to all employees, contractors, vendors, interns, volunteers, and any other individuals who have access to Company systems, devices, networks, software, or data (including remote access).

This includes any account that supports or requires a password, PIN, passphrase, or authentication token.

1. User Authentication

1. Each user must be assigned a **unique user ID** and authentication credentials for access to Company systems.
 - **Shared or group user IDs are prohibited** for user-level access unless explicitly approved in writing by the Practice Manager for limited, documented operational need.
 2. Systems and applications must authenticate using a password/passphrase and/or approved token/MFA method.
 3. The use of non-authenticated accounts or accounts not tied to a single identifiable user is prohibited.
 4. **Account lockout:** Accounts will lock after **six (6)** invalid login attempts within **30 minutes**.
 - Locked accounts will remain locked for at least **30 minutes** or until unlocked by the Practice Manager or authorized administrator.
 5. **Remote access:** Multi-factor authentication (MFA) is required for all remote access to Company systems and networks.
-

2. Password Management

Passwords must be created and managed in accordance with this policy.

Password Requirements

All passwords must meet the following minimum requirements unless a specific system enforces stricter standards:

- Minimum length: **12 characters** (longer is strongly encouraged)
- Must include at least **three (3)** of the following:
 - Uppercase letters (A–Z)

- Lowercase letters (a–z)
- Numbers (0–9)
- Special characters (!@#\$%^&* etc.)
- Passwords must not include:
 - “password,” “welcome,” “123456,” or similar common passwords
 - Company name, practice name, office location, or department names
 - Usernames or email addresses
 - Easily guessed personal information (birthdays, family names, pets)

Password Change / Reset

- Passwords must be changed:
 - When prompted by the system, **or**
 - When a compromise is suspected, **or**
 - When required by Company security standards or audit requirements
- Passwords may not be reused. New passwords must not match the previous **six (6)** passwords.
- The Companies reserve the right to require periodic password changes based on security risk, vendor requirements, or system capability.

Important: Frequent forced password changes can lead to weaker passwords. Employees are expected to maintain strong passwords and immediately report suspected compromise.

3. Password Protection Rules

1. Passwords are confidential and must never be shared with anyone, including coworkers.
2. Passwords may not be shared with vendors or support personnel (including Cloud9 and Clearent support) unless:
 - Approved by the Practice Manager, and
 - Access is required for support, and
 - The password is changed immediately afterward (or temporary credentials are used).
3. Employees must not:

- Write passwords on sticky notes, notebooks, or desk calendars
- Store passwords in unsecured files (Word docs, notes apps, spreadsheets)
- Send passwords via email, standard text message, or chat

4. Employees must use only Company-approved password reset and account recovery procedures.

4. Temporary Passwords

In some cases, the Practice Manager or authorized administrator may issue a temporary password.

- Temporary passwords must be provided verbally or through an approved secure method.
 - The user must log in immediately and change the temporary password.
 - Temporary passwords must never be reused.
-

5. Password Construction Guidelines

A strong password or passphrase:

- Is long and unique (example: **a phrase with mixed characters**)
- Avoids predictable substitutions (ex: “P@ssw0rd!” is not strong)
- Is not a single dictionary word
- Is not based on personal details

Recommended approach: passphrases

Example format:

```
SkiTrips@ItalyAre#MyFav2026!
```

6. Use of Passwords/Passphrases for Remote Access

Access to Company systems via remote access must be secured using:

- Multi-factor authentication (MFA), and
- Strong passwords/passphrases

Where public/private key authentication is used, a strong passphrase is required to protect private keys.

All rules that apply to passwords also apply to passphrases.

7. Password Managers

Employees are encouraged to use a **Company-approved password manager** (if provided/approved) to support strong, unique passwords.

Personal password managers may not be used to store Company passwords unless approved by the Practice Manager.

8. Reporting Compromise or Suspicious Activity

If a password is suspected to be compromised or an account shows suspicious activity, the employee must:

1. Report it immediately to the Practice Manager, and
 2. Change the password(s) as directed, and
 3. Cooperate with any investigation or corrective action.
-

9. Enforcement

Violations of this policy may result in corrective action, **up to and including termination of employment**, and may also result in civil or criminal liability where applicable.

6.26 Employee Parking

Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert, LLC (“Companies”)

Purpose

To ensure convenient access for patients and maintain safe, organized parking at all Company locations, employees must follow the parking rules outlined below.

1. St. Mary’s Office Parking (22900 Three Notch Road)

- Upon employment, all regular full-time and part-time employees will be directed where to park on their first day.

- Beginning **after the first day of employment**, employees are required to park **only in the designated employee parking area/back lot spaces**.
- Employees are **not permitted to park in patient parking at any time**.

Definition – Patient Parking:

Patient parking includes any parking space **adjacent to the office at 22900 Three Notch Road**, including spaces closest to the building and those designated for patient use.

2. Prince Frederick Office Parking

- Employees may park in the garage or in any available parking space without restriction, unless otherwise posted or directed by management.
-

3. Parking Conduct

Employees must:

- Park only in designated areas
 - Follow all posted parking signs and traffic flow directions
 - Avoid blocking entrances, sidewalks, drive lanes, or other vehicles
-

4. Liability

The Companies are not responsible for loss, theft, or damage to any vehicle or its contents while parked on Company property or in any parking garage used for Company business.

5. Enforcement

Failure to follow this policy may result in corrective action.

6.27 Recording Devices/Video Surveillance

Christopher M. Koterwas, DDS, LLC and Koterwas Orthodontics of Calvert, LLC prohibit employee use of audio and video recording in the workplace, including camera-equipped phones, tablets and other devices, when necessary to secure patient/client privacy and/or to protect trade secrets and [include any other specific proprietary business information].

Restrictions on Employee Recording

- Employees are prohibited from bringing audio or video recording devices into areas where patient privacy may be compromised.
- Employees are prohibited from bringing audio or video recording devices into areas and/or meetings where company trade secrets or patient information could be disclosed.
- Employees may record workplace activities that are not prohibited by law or do not compromise confidential information as described above.

Company Monitoring

Christopher M. Koterwas, DDS, LLC and Koterwas Orthodontics of Calvert, LLC reserve the right to install security cameras in work areas for specific business reasons, such as security, theft protection, or protection of proprietary information.

The Companies may find it necessary to monitor work areas with security cameras when there is a specific job- or business-related reason to do so. The company will do so only after first ensuring that such action complies with state and federal laws.

Employees should not have any expectation of privacy in work-related areas.

Employee privacy in nonwork areas will be respected to the extent possible. The Company's reasonable suspicion of onsite drug use, physical abuse, theft or similar circumstances would be possible exceptions. Legal advice will be sought in advance in such rare cases where nonwork-area privacy must be compromised.

Employees should contact their supervisor or the human resource (HR) department if they have questions about this policy.

Nothing in this policy is intended to, nor should be construed to limit or interfere with employee rights as set forth under all applicable provisions of the National Labor Relations Act, including Section 7 and 8(a)(1) rights to organize and engage in protected, concerted activities regarding the terms and conditions of employment.

6.28 Cellphones

Policy Overview:

The Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert's cell phone policy offers general guidelines for using personal cell phones during work hours.

Due to the potential for issues such as invasion of privacy, sexual harassment, and loss of productivity, as well as inappropriate disclosure of confidential information, the use of any type of phone or video recording device, including but not limited to smart devices (phone, watches, glasses), anywhere on Companies property or while performing work for Companies, including to record conversations or activities of other employees or management, is strictly prohibited, unless the device was provided by Companies and is used solely for legitimate authorized business purposes.

The purpose of this policy is to help us all get the most out of the advantages cell phones offer our company while minimizing distractions, accidents, and frustrations improper cell phone use can cause.

This policy applies to all of The Company's employees.

Cell Phone Use Guidelines:

The following are Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert's basic guidelines for proper employee cell phone use during work hours. Cell phones should not be used when they could pose a security or safety risk or when they distract from work tasks.

- Never use a cell phone while in the operatory or in customer service areas.
- Do not use cell phones for surfing the internet, watching shows or movies or gaming during work hours.
- Avoid using work cell phones for personal tasks.
- Avoid using personal cell phones for work tasks.
- Do not use cell phones during meetings.
- Do not use cell phones to record confidential information.

We realize that cell phones can be great tools for our employees. We encourage employees to use cell phones when:

- Make or receive non-work calls in the appropriate place and situation.
- For other work-related communication, such as text messaging or emailing, in appropriate places and situations.
Note: patient information should never be exchanged via personal cell phone.
- To schedule and keep track of personal appointments.
- To keep track of work tasks.
- To keep track of work contacts.

Disciplinary Action:

Improper use of cell phones may result in disciplinary action. Continued use of cell phones at inappropriate times or in ways that distract from work may lead to having cell phone privileges revoked.

Cell phone usage for illegal or dangerous activity, for purposes of harassment, or in ways that violate the company confidentiality policy may result in employee termination.

6.29 Solicitation and Distribution

To avoid distractions, solicitation by the employee of another employee is prohibited while either employee is on work time and in all immediate patient care areas. "Work time" is defined as the time the employees are engaged, or should be engaged, in performing their tasks for Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC. Solicitation of any kind by non-employees on Companies premises is prohibited at all times.

Distribution of advertising material, handbills, printed or written literature of any kind in immediate patient care areas and all other working areas of Companies is prohibited at all times. Distribution of literature by non-employees on Companies premises is prohibited at all times.

6.30 Professional Appearance, Conduct & Clinical Standards

Purpose

All employees—front desk, clinical, and administrative—play a vital role in shaping each patient's experience. As part of our Ritz-Carlton-inspired customer service philosophy, patients form an immediate emotional impression of our practice based on how we communicate, how we appear, and how we conduct ourselves. That first impression begins the moment a patient encounters Dr. Koterwas and the team and must consistently reflect professionalism, cleanliness, warmth, and safety.

These standards are aligned with Front Desk Professional Standards and apply to all staff, with additional clinical and infection-control requirements as outlined below.

1. You Represent the Practice

Every employee represents Koterwas Orthodontics while on duty. Patients should always experience a calm, confident, and professional environment.

Standards include:

- Reporting to work clean, well groomed, and dressed according to role-specific requirements
- Maintaining a polished, professional appearance at all times
- Wearing required uniforms, safety equipment, and name badges as applicable

Employees who report to work dressed or groomed inappropriately may be asked to leave and return only when standards are met.

2. Professional Appearance Guidelines

Uniforms & Clothing

- Clean, wrinkle-free uniforms are required
- Scrubs must be clean and free of stains
- Appropriate undergarments must be worn and must not be visible through scrubs or clothing
- No sweatshirts, hoodies, coats, or outside jackets are permitted in patient areas
- Only Koterwas Orthodontics-issued jackets may be worn as an additional layer in patient areas

Hair, Grooming & Hygiene

- Hair must be neat, well groomed, and professional
- Facial hair must be clean, neat, and trimmed
- Employees must wear socks and deodorant
- Employees must not smell of cigarette smoke

Fragrance / Scent Policy

To support patient comfort and medical sensitivities:

- Avoid strong perfume, cologne, body sprays, or scented lotions
 - Scented products should never be noticeable to patients or coworkers
-

3. Tattoos, Jewelry & Piercings

Tattoos

- Tattoos must be covered while at work whenever possible using appropriate attire (e.g., long sleeves)

Jewelry & Piercings

To maintain a conservative, professional, and clinical-safe appearance:

- Jewelry must be minimal and professional
 - **One small, discreet stud in the nose is permitted**
 - All other facial piercings are not permitted, including lips, tongue, septum, gauges, hoops, or multiple facial piercings
 - Ear piercings should be small and professional and must not interfere with safety or patient care
 - Management may require removal of jewelry for professionalism or safety reasons
-

4. Footwear

- Athletic or clinical shoes that can be properly disinfected are required
 - Shoes must support staff safety and clinical infection control standards
-

5. Fingernail Hygiene & Infection Control Standards

Fingernail regulations are essential to minimizing infection risk and ensuring patient safety. These standards apply particularly to employees involved in direct patient care and are aligned with recognized healthcare best practices.

Nail Length

- Fingernails must be kept short (no longer than 1/4 inch beyond the fingertip)

Artificial Nails

- Artificial nails, acrylics, gel nails, extensions, overlays, or nail enhancements are not permitted for employees with direct patient contact

Nail Polish

- Nail polish, if worn, must be neutral in color
- Nail polish must be well maintained and free of chips, cracks, or peeling

Hand Hygiene Compatibility

- Fingernails must allow for effective handwashing and glove use
- Employees must be able to thoroughly clean beneath their nails

Supervisors may routinely monitor compliance with fingernail hygiene standards.

6. Professional Conduct & Workplace Expectations

Calm and Professional Presence

- Maintain a calm, respectful demeanor at all times
- Avoid appearing rushed, distracted, or irritated in patient areas
- Even during busy or stressful periods, professionalism must be maintained

Respectful Workplace & No Gossip Policy

- No gossip, negative conversations, or inappropriate discussions in patient areas
 - Speak respectfully about coworkers, providers, and patients at all times
 - Support teamwork and a respectful workplace culture
-

7. Work Areas & Clinical Spaces

- Patient and work areas must remain clean, organized, and professional
 - Personal items must be stored out of patient view
 - Paperwork, charts, and materials must be secured when not in use
-

8. Scrub & Jacket Policy

- Company-approved standard scrub color is **black**
- Each employee will be provided with **two (2) sets** of approved scrubs
- Employees may select scrubs from approved Amazon or Walmart vendors with prior approval
- Employees purchasing their own scrubs must submit receipts for reimbursement following approval

- Upon separation from employment, all scrubs must be returned

Pride Fridays (Scrub Color Exception)

- **Fridays are designated as “Pride Fridays.”**
- On Fridays only, staff are permitted to wear **a pre-selected color** in place of black scrubs. Staff must wear their designated (pre-selected) color so we don't have duplicates.
- Pride Friday scrubs must meet all other uniform standards (clean, wrinkle-free, professional fit, appropriate undergarments).
- This exception applies to all staff unless role-specific safety requirements dictate otherwise.

Why Pride Fridays Matter

Pride Fridays reflect our commitment to kindness, inclusion, and respect for all patients, families, and team members. They are a visible reminder that Koterwas Orthodontics strives to be a welcoming, affirming, and safe environment for everyone.

By participating in Pride Fridays, our team celebrates diversity while maintaining the same high standards of professionalism and patient care that define our practice. Inclusion and excellence go hand in hand, and Pride Fridays allow us to express both.

Jackets

- Clinical staff will wear company-issued jackets over scrubs as needed
- Jackets are laundered at the St. Mary's office after each use
- Front office and administrative staff may wear the same jackets if cold
- Koterwas Orthodontics jackets are the only acceptable additional layer in patient areas
- All uniform items must be surrendered upon separation from employment, all scrubs must be returned

Jackets

- Clinical staff will wear company-issued jackets over scrubs as needed
- Jackets are laundered at the St. Mary's office after each use
- Front office and administrative staff may wear the same jackets if cold
- Koterwas Orthodontics jackets are the only acceptable additional layer in patient areas
- All uniform items must be surrendered upon separation from employment

9. Non-Discrimination & Reasonable Accommodation Statement

Koterwas Orthodontics maintains professional appearance, dress, grooming, and conduct standards to support a safe, respectful, and professional environment for patients, families, and staff.

These standards are applied consistently and without discrimination in accordance with applicable federal and Maryland laws. The practice does not discriminate based on race, color, religion, sex (including pregnancy, sexual orientation, and gender identity), national origin, age, disability, marital status, genetic information, or any other status protected by law.

Reasonable accommodations related to dress, grooming, appearance, or conduct will be provided for religious practices or medical conditions/disabilities unless doing so would create an undue hardship, pose a safety risk, or interfere with essential job functions.

Employees requesting accommodations should notify Joanne Koterwas, Practice Manager. Requests will be handled confidentially to the extent possible.

Concerns & No Retaliation

Employees are encouraged to report concerns regarding the application of these standards, discrimination, harassment, or accommodation needs to Joanne Koterwas, Practice Manager.

Retaliation is strictly prohibited. No employee will be retaliated against for raising concerns in good faith, requesting an accommodation, or participating in an investigation.

Section 7 - Health & Safety

7.1 Workplace Violence Prevention Policy

Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC (“Companies”)

Purpose

The Companies are committed to providing a safe workplace for employees, patients, and visitors. Violence, threats, intimidation, and disruptive behavior will not be tolerated. This policy establishes expectations and procedures for preventing, reporting, and responding to workplace violence or potentially dangerous situations.

Scope

This policy applies to all employees, contractors, interns, volunteers, students, temporary staff, and any individuals present on Company property or engaged in Company business, including patients, family members, vendors, and visitors.

Policy Statement (Zero Tolerance)

The Companies maintain a zero-tolerance approach to workplace violence. Any act or threat of violence, intimidation, harassment, or disruptive behavior is prohibited and will result in swift action.

Definitions

For purposes of this policy, workplace violence includes, but is not limited to:

- **Threats:** Verbal, written, electronic, or implied statements of intent to harm
- **Intimidation:** Aggressive behavior intended to frighten, control, or coerce
- **Harassment or stalking:** Repeated unwanted conduct that creates fear or distress
- **Physical violence:** Hitting, pushing, kicking, throwing objects, or any physical assault
- **Weapons:** Firearms, knives, explosives, or any object used or intended to cause harm

Prohibited Conduct

The following conduct is strictly prohibited on Company property or while conducting Company business:

- Threatening, intimidating, coercing, or harming any person
 - Possession, display, or use of weapons on Company property (including parking lots), except as permitted by law and expressly authorized by management
 - Fighting, horseplay, or aggressive physical contact
 - Abusive, hostile, or disruptive behavior toward employees, patients, or visitors
 - Bringing domestic disputes into the workplace
 - Retaliation against anyone who reports threats or participates in an investigation
-

Reporting Threats / Potentially Dangerous Situations

All potentially dangerous situations, including threats made by co-workers, patients, visitors, vendors, or any other individual, must be reported **immediately** to any member of management with whom you feel comfortable.

Reports of threats will be maintained as confidentially as possible. Information will be shared only on a need-to-know basis, provided that maintaining confidentiality does not impede the Companies' ability to investigate, respond appropriately, or protect the safety of employees, patients, and visitors.

All reported threats will be **promptly and thoroughly investigated**. All employees are required to cooperate fully in any investigation.

The Companies strictly prohibit retaliation. No employee will be subjected to retaliation, intimidation, or adverse action for reporting a threat or safety concern in good faith under this policy.

If the Companies determine, after an appropriate good faith investigation, that this policy has been violated, the Companies will take swift and appropriate **corrective action**, up to and including termination of employment, and may involve law enforcement when warranted.

If an employee is the recipient of a threat made by an outside party, the employee must follow the reporting steps outlined below. It is essential that the Companies are made aware of any potential danger in our offices so that effective measures can be taken to protect employees, patients, and visitors from the threat of a violent act by an employee or any other individual.

Procedure for Reporting a Threat

1) If there is immediate danger

If there is an active threat or immediate danger:

- **Call 911 immediately**
- If safe to do so, move yourself and others to a secure location
- Notify the Practice Manager or the most senior staff member on-site as soon as possible

2) Notify management immediately

If the situation is not an immediate emergency, report it immediately to:

- The **Practice Manager**, or
- Any member of management with whom you feel comfortable

3) Document what happened

As soon as possible, provide details including:

- Date/time/location
- Person(s) involved (name/description)
- What was said or done (exact words if possible)
- Names of witnesses
- Any supporting evidence (texts, emails, voicemails, social media messages)

Employees must preserve evidence and provide copies to management.

Investigation and Response

Management will assess the situation and take appropriate steps, which may include:

- Removing individuals from the premises
- Contacting law enforcement
- Restricting access or issuing a no-trespass order
- Adjusting schedules, staffing, or patient flow
- Escorting staff to vehicles

- Implementing safety plans and follow-up monitoring
-

Domestic Violence / Personal Safety Concerns

Employees are encouraged to notify management if they believe domestic violence, harassment, or protective orders may impact workplace safety. The Companies will work with the employee, as appropriate, to develop safety measures to the extent possible.

No Retaliation

The Companies prohibit retaliation against any employee who:

- Reports a threat or safety concern in good faith, or
- Participates in an investigation

Any retaliation may result in corrective action, up to and including termination.

Corrective Action

Violations of this policy may result in corrective action, up to and including termination of employment. The Companies reserve the right to skip steps in corrective action depending on severity. Threats or violence may also result in law enforcement involvement and legal consequences.

Employee Responsibility

All employees are expected to:

- Treat others with respect
- Avoid escalating conflict
- Report threats or unsafe behavior immediately
- Cooperate fully with investigations
- Follow safety instructions from management during an incident

Section 8 - Acknowledgments

8.1 Recording Devices/Video Surveillance Policy Acknowledgment

Acknowledgment

I acknowledge that **Christopher M. Koterwas, DDS, LLC and Koterwas Orthodontics of Calvert, LLC** (collectively, the “Companies”) use monitoring and surveillance measures in the workplace for legitimate business purposes, including but not limited to patient safety, staff safety, security, theft prevention, quality assurance, and protection of Company property and confidential information.

I understand and acknowledge that the Companies may use, where permitted by law:

- Video surveillance cameras in and around Company facilities
- Security systems and access controls
- Monitoring of Company-owned technology systems (including computers, internet access, email, and network activity)

I understand that surveillance and monitoring may occur during working hours and may also occur outside of working hours in areas where cameras or security systems are in operation.

I understand that **there is no expectation of privacy** while on Company property or while using Company systems, **except in areas where privacy is legally required**, such as restrooms and similar private areas.

I further understand that surveillance footage and monitoring records may be reviewed by management and may be used for business, safety, security, investigative, training, and compliance purposes, including as part of investigations or corrective action.

I agree to comply with all Company policies regarding privacy, confidentiality, and workplace conduct, including policies regarding unauthorized recording.

Employee Printed Name: _____

Employee Signature: _____

Position: _____

Date: _____

The signed original of this acknowledgment must be returned to management and will be maintained in the employee's personnel file.

8.2 Master Handbook Receipt and Legal Acknowledgment of Understanding

Handbook Receipt and Understanding

I acknowledge that I have received access to and/or a copy of the Employee Handbook for **Christopher M. Koterwas, DDS, LLC & Koterwas Orthodontics of Calvert LLC** (collectively, the “Companies”). I understand that it is my responsibility to read, understand, and comply with the policies, procedures, rules, and standards contained in the Employee Handbook and in any updates issued by the Companies.

I understand that the Employee Handbook provides general information and guidelines and does not address every situation that may arise during my employment.

I understand that the Companies reserve the right to interpret, modify, rescind, suspend, or change any policy, benefit, or practice described in the Employee Handbook at any time, with or without notice, subject to applicable law. I understand that updated policies replace prior versions and apply immediately upon issuance.

At-Will Employment Acknowledgment

I acknowledge that my employment with the Companies is **at-will**. I understand that either the Companies or I may terminate the employment relationship at any time, with or without cause, and with or without notice, subject to applicable law.

I understand that nothing in the Employee Handbook, any Company policy, procedure, benefit, practice, or any verbal or written statement creates or is intended to create a contract of employment, a guarantee of continued employment, or a guarantee of compensation or benefits.

I further understand that no supervisor, manager, or representative of the Companies has authority to enter into any agreement that alters the at-will employment relationship unless it is in writing and signed by me and an authorized Company representative.

Corrective Action Acknowledgment

I understand that failure to comply with Company policies, procedures, or standards may result in corrective action, up to and including termination of employment.

I understand that the Companies are not required to follow any specific sequence of corrective action and may determine the appropriate level of corrective action, including skipping steps, based on the circumstances.

Confidentiality and HIPAA Acknowledgment

I acknowledge that during my employment or engagement with the Companies, I may have access to confidential, proprietary, or protected information, including **Protected Health Information (PHI)**.

I understand and agree that I must protect the confidentiality and security of all patient, employee, and business information in accordance with the Companies' policies, including the **Confidentiality Policy**, **HIPAA**, and all applicable privacy and security laws.

I understand that these obligations apply during and after my employment and that violations may result in corrective action, up to and including termination of employment, as well as potential civil or criminal penalties.

Technology Use / Monitoring Acknowledgment

I understand that the Companies' technology systems (including computers, email, internet access, software, phones, and electronic records) are provided for business purposes. I understand that the Companies may monitor, access, and review the use of Company systems and communications to the extent permitted by law.

I acknowledge that I have **no expectation of privacy** when using Company systems, devices, networks, or technology resources.

Training Acknowledgment

I understand that I may be required to complete training (including HIPAA, privacy, cybersecurity, safety, and workplace conduct training) as a condition of employment and/or continued employment. I agree to complete all required training within the required timeframe.

Reporting and Cooperation Acknowledgment

I agree to promptly report suspected policy violations, safety concerns, and any actual or suspected privacy/security incidents (including HIPAA concerns) to management.

I understand and agree that I must cooperate fully in Company investigations involving workplace conduct, patient privacy, data security, safety, or policy compliance.

Maryland Healthy Working Families Act (HWFA) Acknowledgment

I acknowledge that I have been informed of my rights under the **Maryland Healthy Working Families Act (HWFA)**, which may provide eligible employees with paid or unpaid sick and safe leave in accordance with applicable law.

I understand that the accrual, use, and administration of sick and safe leave are governed by Company policy and Maryland law, and that protected leave taken in compliance with the law will not result in retaliation or adverse action.

Maryland Wage and Hour / Timekeeping Acknowledgment

I acknowledge that I am entitled to compensation for all hours worked in accordance with Maryland and federal wage and hour laws, including overtime requirements where applicable.

I understand that I am responsible for accurately recording all time worked in accordance with Company policy. I understand that working “off the clock,” failing to report time worked, or falsifying time records is prohibited and may result in corrective action, up to and including termination.

Return of Company Property Acknowledgment

I agree to return all Company property and materials immediately upon request and/or upon separation of employment. This includes, but is not limited to: keys, badges, uniforms, equipment, devices, records, patient information, documents, and any confidential or proprietary information in any form.

Governing Law Acknowledgment

I acknowledge that my employment is governed by applicable federal, state, and local laws, including the laws of the State of Maryland. Nothing in this acknowledgment or the Employee Handbook is intended to limit or waive any rights or obligations provided by applicable law.

Final Acknowledgment

I acknowledge that I have read and understand this acknowledgment. I agree to comply with Company policies and understand that failure to do so may result in corrective action, up to and including termination of employment.

Employee Printed Name: _____

Employee Signature: _____

Position: _____

Date: _____

The signed original of this acknowledgment must be returned to management and will be maintained in the employee's personnel file.