

EMPLOYEE HANDBOOK

IMG ACADEMY, LLC
IMG PERFORMANCE, LLC



**IMG EMPLOYEE HANDBOOK
IMG PERFORMANCE GROUP COMPANIES:
IMG ACADEMY, LLC
IMG PERFORMANCE LLC**

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Section I: Introduction

Welcome to IMG Academy, IMG Performance and the IMG Performance Group Companies

We hope your work experience at IMG Academy, LLC, IMG Performance, LLC and the other IMG Performance Group companies (collectively referred to in this handbook as “IMG”) is a positive and enjoyable one that benefits both you and IMG.

The obligations and restrictions in this handbook apply to all IMG’s staff, including full-time, part-time, and seasonal staff, as well as interns. This handbook is intended as a helpful point of reference for practical questions you may have about your employment with IMG. You will understand that from time to time our corporate policies may be subject to change and we will endeavour to update you as and when this should happen. If you have any questions that are not answered within this handbook, please refer to the Human Resources team.

We look forward to your personal commitment and support of IMG’s goals.

IMG’s Expectations of Employees

The IMG team is committed to providing a superior academic, sports training, and living environment for our clients and customers. Moreover, IMG is also committed to developing our young clients and customers into responsible young adults by exhibiting role model behavior at all times. IMG’s behavior is critical in an environment where the clients and customers we serve interact with IMG’s team on a 24/7 basis. IMG’s expectations are based on IMG’s core values of respect, excellence, ethics, honesty and safety.

Respect

Expectation of an environment that promotes interactions which are positive, motivating and supportive.

Commitment to Excellence

Expectation of an environment where pride in one’s work is the standard, clients’ and customers’ interests come first and dedication to superior service is rewarded.

Ethics

Expectation of an environment where actions are motivated by the well being of IMG instead of personal gain.

Honesty

Expectation of an environment where integrity is the benchmark for decision making and one’s words and actions can be relied upon as truthful.

Safety

Expectation of an environment where concerns for safety and security guide day-to-day operational decisions.



Your Obligation to Speak Up

All employees have a duty to report any knowledge of any possible violation of the law, this Handbook or any IMG policy to HR, Legal or anonymously to the Business Ethics Hotline. If you see or suspect a violation, use the Complaint Resolution Procedure below. Any employee who shares concerns will be treated with dignity and respect.

IMG prohibits any form of retaliation against employees who, in good faith, report information in connection with this Handbook. All communications received from any employee will be kept as confidential as possible, but information may need to be shared depending on the circumstances.

There are times within any organization when there are conflicts and misunderstandings. It is IMG's policy to offer resolution to problems and complaints as they occur. If you have anything to report regarding workplace business wrongdoing, workplace harassment, workplace violence, any of IMG's workplace policies as contained in the Handbook or other company policies, please follow this procedure:

1. Any employee with a complaint should report the alleged act immediately to his or her supervisor, Business Unit leader, HR or the Legal Department. If the matter is not resolved at this level, or you feel dissatisfied with the action taken, contact IMG's General Counsel. Alternatively, you may use the Business Ethics Hotline.
2. All complaints will be handled in as timely and confidential a manner as possible under the circumstances.
3. Investigation of a complaint will normally include discussions with the parties involved and any witnesses. Those responsible for the investigation will maintain the confidentiality of the allegations of the complaint and the identity of the persons involved to the extent practicable, subject to the need to conduct a full and impartial investigation, remedy any violations of IMG's policies, or monitor compliance with or administer the company's policies. Employees will not be subjected to coercion, intimidation, retaliation or discrimination for filing a complaint or assisting in an investigation. All employees are expected to cooperate fully with any investigation. Please note that it is a violation of IMG policy to not cooperate fully with any investigation.
4. If the investigation reveals that the complaint is valid, prompt remedial action will be taken.
5. If the investigation reveals that any complaint or information provided by an employee was deliberately deceitful or dishonest, the individual who provided such false information may be subject to disciplinary action.
6. If any party involved in an investigation is dissatisfied with the outcome or resolution, that individual has the right to appeal the decision. The dissatisfied party should promptly submit written comments to HR. A written response will be provided following a review of the comments.



To help facilitate the disclosure of violations of our Code and company policy, we offer a confidential hotline reporting procedure. We have retained the services of The Network, an independent reporting service in the United States that allows you to confidentially communicate your concerns safely and securely via Web report or toll-free telephone number, 24 hours a day, 7 days a week, anywhere in the world.

To report via phone: 877.537.8685

To report via Web: <http://www.tnwinc.com/imgworld>

Violations of This Handbook

Failure to comply with the policies and procedures set forth in this Handbook, or other IMG policies, may lead to disciplinary action, up to and including termination.

Handbook Disclaimer

This handbook is only a general guide to some of the current United States employment policies of IMG and to some of benefits and responsibilities as an employee. This handbook is informational only and should not be construed as a contract or guarantee of employment.

From time to time, IMG reviews its policies, procedures and benefits and makes revisions. Thus, any policy, procedure, or benefit outlined in this handbook may be modified or eliminated at any time with or without advance notice and nothing herein is intended to change the status of any employee's at-will employment. Employees employment with IMG is "at will", meaning that either the employee or IMG can terminate your employment at any time and for any reason, with or without cause and with or without notice. None of the policies contained in this handbook are intended to create, nor should they be construed to create, any expectation or guarantee of continued employment for any length of time.

No written or oral representation by IMG personnel is intended to create a contract of employment. No employment practice of IMG is intended to create a contract of employment. Any change in the at-will employment policy must be executed in writing and signed by the Managing Director.



Section II: Employee Conduct and Business Ethics

Equal Employment Opportunity

It is IMG policy to provide equal employment opportunities for all employees and applicants for employment. This means that IMG will not discriminate against an applicant for employment or any employee because of race, color, religion, sex, age, disability, national origin, marital status, pregnancy, military status, or any other category protected by applicable state or federal law in hiring, promoting, demoting, compensation, benefits, training, working conditions, transfer, layoff or termination.

Employee Conduct & Business Ethics

IMG's policy requires all employees to observe high standards of business and personal ethics in the conduct of their work, duties and responsibilities. Employees are expected to practice honesty and integrity in every aspect of their employment with IMG, with other IMG employees and with the public, clients, suppliers and government authorities.

IMG's policy prohibits unlawful discrimination against employees, clients, customers, or suppliers due to race, color, religion, sex, sexual orientation, national origin, citizenship status, age, marital status, or disability. IMG expects all persons to be treated with dignity and respect, recognizing that IMG is made up of individuals who strive to work toward the common goal of carrying out their work, duties and responsibilities in the light of what is right for the good of IMG.

All IMG employees are to abstain from illegal or criminal conduct. IMG, its officers, managers, employees, contractors and vendors are expected to comply with all applicable laws and regulations, IMG policies and community guidelines and to conduct business in accordance with all applicable laws and refrain from any illegal, dishonest, or unethical conduct. It is also important that not only during the business day, but also in any situation where employees are in attendance at an IMG function or where employees represent or may be perceived as representing IMG, employees maintain a high standard of ethical conduct.

IMG expects its employees to conduct business according to the highest ethical standards of conduct. Employees are expected to devote their best efforts to the interests of IMG and the conduct of its affairs.

Employees are prohibited from engaging in outside business or financial activities that conflict with the interests of IMG. Do not put yourself in a position where you are competing with IMG or advancing your personal interests over IMG's through ownership of a material interest in a competitor, supplier, contractor or other organization with whom we do business. This includes holding, directly or indirectly, a position or a material financial interest in any outside business from which IMG secures good or services, or with which IMG engages in any related transactions. Employees are not permitted to solicit, accept, or retain any gift or personal benefit from any supplier, vendor or any individual or organization doing or seeking to do business with IMG.



IMG recognizes employees may wish to engage in activities outside of their employment with IMG which are of a private nature and unrelated to IMG's business. However, a policy of full disclosure must be followed to assess and prevent potential conflicts of interest from arising. It is important that outside employment interests do not adversely affect your ability to fulfill your job duties at IMG. You must have the approval of your HR Department before you accept a second job or agree to act as an advisor, consultant, officer or director. Moreover, while we encourage you to participate in and support charitable organizations and your communities by taking an active role in volunteer activities, you should not allow your volunteer activities to interfere with the conduct of IMG business. If you are in doubt as to the propriety of a particular situation, consult with the Director of the employee's department or Human Resources.

Engaging in any of the following activities may result in immediate discipline, up to and including termination: theft; embezzlement; disclosure of trade secrets or confidential information; willful violation of safety or security violations; engaging in a conflict of interest; conviction of a felony; intoxication in the workplace; the sale, use, or possession of illegal substances; falsification of records (including but not limited to time and attendance records and expense reports); dishonesty; poor performance; destruction or unauthorized use of equipment, facilities, or materials of IMG; bringing a firearm or other weapon into an IMG facility; or frequent tardiness or absenteeism. The above list is not intended to include all offenses for which an employee may be disciplined or discharged, but rather to set forth several guidelines of inappropriate behavior. The list does not alter the at-will nature of the employment relationship. Discipline will be determined at IMG's discretion on a case-by-case basis, depending on the specific circumstances and any mitigating circumstances.

All employees have a duty to report any knowledge of any possible violation of the law or IMG's Employee Conduct & Business Ethics Policy to the supervisor/head of their department, or the Vice President or Director of Human Resources. All communication received from any employee in connection with this policy will be kept as confidential as possible, but information may need to be shared depending on the specific circumstances. IMG prohibits any form of retaliation against employees who, in good faith, report information in connection with this policy. To help facilitate the disclosure of violations of this policy, IMG has developed a confidential hotline reporting procedure.

Potential violations of this Employee Conduct & Business Ethics Policy may also be reported on a confidential basis via the IMG Ethics Hotline for IMG Worldwide: 877-537-8685. The Senior Vice President of Human Resources or Legal Department will periodically check this phone's mailbox and respond as appropriate to all messages. Direct communication (that is, versus leaving a message), however, is always an option and is encouraged.

Confidential Information and Non-Solicitation

In the course of employment by IMG, employees have access to IMG's most sensitive and most valuable proprietary information, "Trade Secrets" and "Confidential Information" (both defined below) concerning IMG, its present and future business plans, pricing information, development projects, health, demographic and financial information regarding its affiliates, clients, customers, and business affairs which constitute valuable business assets of IMG, the use, application or disclosure of any of which will cause substantial and possible irreparable damage to the business and asset value of IMG.



- A. At any time upon the request of IMG, and in any event upon the termination of employment, employees shall deliver to IMG all memoranda, notes, records, drawings, manuals, files or other documents, and all copies of each, concerning or constituting “Confidential Information” or Trade Secrets and any other property or files belonging to IMG that are in the possession of the employee, whether made or compiled by the employee or furnished to or acquired by the employee from IMG.
- B. Employees shall hold in confidence the Trade Secrets of IMG. Except in the performance of services for IMG, employees shall not at any time use, disclose, reproduce, distribute, transmit, reverse engineer, decompile, disassemble, or transfer the Trade Secrets of IMG or any portion thereof.
- C. Employees shall hold in confidence the Confidential Information of IMG. Except in the performance of services for IMG, employees shall not at any time during the employees’ employment with IMG and for a period of three years thereafter use, disclose, reproduce, distribute, transmit, reverse engineer, decompile, disassemble, or transfer the Confidential Information of IMG or any portion thereof.
- D. Employees who are assigned passwords, codes, or keys, or who are given special access or responsibilities in connection with Confidential Information, or any records, materials or items of monetary or business value shall use sound judgment and discretion in carrying out their duties and maintaining the confidentiality of their passwords, codes, keys, or access to or responsibilities in connection with Confidential Information. Employees will be held accountable for any wrongdoing or acts of indiscretion that may result from the use of their assigned passwords, codes, keys or access to Confidential Information, whether the use is by the employee or a third-party, and whether the disclosure of any assigned passwords, codes, keys or access to Confidential Information was intentional or unintentional.
- E. In some instances, our staff may have confidential information regarding students or staff. It may be medical related or just personal information that needs to remain confidential. We as employees are required by law to keep all personal information confidential and follow the Health Information Privacy Protection Act (HIPPA) to keep this information secure and confidential. In the event that personal information must be disposed, a shredder is located in Human Resources to properly dispose of the confidential information.
- F. Employees should take confidential information off desks, computers, recycling bins and wastebaskets. Help keep this information secure by doing the following:
 - a. Secure information in areas that are not accessible by people who don’t have a need to know the information.
 - b. Do not leave confidential information on the counter, desk or other open area.
 - c. Shred confidential information.
 - d. Secure your computer screen. Use a screen saver lock to prevent unauthorized persons from accessing your computer. Log off when the computer is not in use.



For the purposes of this section, the following definitions apply:

“Trade Secret” means information, including a formula, a pattern, a compilation, a program, a device, a business method, a technique, or a process that: (A) derives economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and (B) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy. Trade secrets also includes any information or data described above which IMG obtains from another party and which IMG treats as proprietary or designates as trade secrets, whether or not owned or developed by IMG.

“Confidential Information” means any data or information, other than Trade Secrets, that is valuable to IMG and is not generally known by the public. To the extent consistent with the foregoing, Confidential Information includes, but is not limited to lists (whether or not in writing) of and other information about IMG current or prospective customers, lists of and other information about IMG’s executives and employees, financial information (whether or not in writing) that has not been released to the public, marketing techniques, price lists, pricing policies, and IMG’s business methods, contracts and contractual relations with suppliers and future business plans. Confidential Information also includes any information or data described above which IMG obtains from another party and which IMG treats as proprietary or designates as confidential information whether or not owned or developed by IMG.

Noncompete, Nonsolicit and Nonrecruit

A. Noncompete and Nonsolicitation

Employees shall not, during their employment with IMG, except on behalf of IMG or with the prior written consent of IMG, either directly or indirectly, on the employee’s own behalf or in the service of or on behalf of others, solicit, contact, or call upon any IMG client, customer, prospective IMG client or customer, or their families seeking to provide “Competitive Services” (defined below), or to transfer or otherwise divert business from IMG.

B. Nonrecruit

Employees shall not, during their employment with IMG, either directly or indirectly, on the employee’s own behalf or in the service of or on behalf of others, hire, attempt to hire, solicit or attempt to solicit any person employed by IMG, whether or not such person is a full-time employee, part-time employee or a temporary employee and whether or not such employment is pursuant to a written agreement or independent contractor agreement and whether or not such employment is for a determined period or is at-will.

For the purposes of this handbook, the following definition applies:

“Competitive Services” means selling or providing any services in the nature of or competitive with those services typically provided by IMG.



Worker for Hire and Property Rights

IMG employees perform their services on a work-for-hire basis as defined under United States intellectual property laws.

All intellectual property rights to patents, trademarks and copyrights obtained by IMG employees during IMG employment or as a result of work done for IMG and any royalties or other payments resulting from them, are owned exclusively by IMG. Included are all ideas, discoveries, inventions, contributions and improvements, whether patentable or not, which in any way relate to IMG or its businesses or tasks assigned to the employee, that are made or conceived by the employee, whether alone or with others, during or after usual work hours, either while on or off the job. IMG is entitled to dispose of those rights in its sole discretion and is entitled to all proceeds there from. If any of an employee's services are deemed not to be a work-for-hire, the employee will cooperate with IMG, sign such papers and take such acts as to assign to IMG all rights (described below), title and interest to any patents, inventions, copyrights and materials created within the scope of IMG employment or while employed by IMG.

These rights include, without limitation: all rights in any manuscripts, research materials, artwork, instructional materials, software, teaching aides, photographs, audio tapes, video tapes and television programming.

Complaint Resolution Procedure

IMG strives to provide a working environment in which every employee is treated in a fair and just manner. IMG recognizes that issues, concerns and disputes occasionally arise in the workplace. IMG wants all employees to feel comfortable discussing concerns with supervisors without fear of reprisal. To achieve this goal and to foster open communications among all employees, IMG has adopted an open door policy.

Employees are encouraged to discuss any issues, concerns or problems with the appropriate supervisor, manager or a member of Human Resources. All practicable efforts will be made by supervisors, managers and Human Resources to be available to discuss any issues employees would like to discuss regarding their work environment at IMG and they will review the employee's situation, make a determination and provide the employee with an answer.

Employee Behavior

All employees of IMG should perform their job duties in an honest, efficient and courteous manner in order to make the work environment an effective, productive, safe and pleasant place. The following rules are designed to ensure a smooth-running organization in the best interest of all employees, IMG and its clients and customers. These rules are not inclusive of all rules of conduct for which an employee may be disciplined and they do not in any way alter the at-will employment relationship. They are merely examples of some types of inappropriate conduct.

The use of profanity, abusive or threatening language, or intimidating coercive behavior is prohibited. The sale, possession, or use of intoxicating substances including alcohol, marijuana, hallucinatory drugs or heroin and other controlled substances is prohibited, as is



coming to work under the influence of the same. Employees may not destroy IMG property (regardless of the form), misuse IMG property, or take IMG property for their personal use or advantage.

Conduct towards supervisors and management should be one of cooperation and cordiality when work is assigned and direction given. There should also be a mutual cooperation among subordinates and peers to ensure a team-like atmosphere.

Solicitations

In an effort to maintain an orderly and productive work environment, IMG does not permit third parties to distribute literature or printed materials of any kind, to sell merchandise, to solicit financial contributions, or to solicit for any cause during the working hours of IMG employees without its consent. The non-solicitation policy protects employees from being approached in the workplace during working hours for money, from being solicited to join an organization, or to sign a petition. In addition, employees are not allowed to be solicited to buy a product or merchandise or to make a charitable contribution during their working day.

If approved by Human Resources in advance, an employee may ask that an exception be made for activities relating to community projects or charitable, non-profit organizations provided that these activities are done on non-work time and in non-work areas of both the soliciting employee and those who are being solicited. If employees have personal items available for sale, approval will be dealt with on a case-by-case basis. If an ad for the items for sale is approved by Human Resources, all items on display will be dated and removed after an appropriate amount of time.

Gifts, Gratuities and Entertainment

The occasional exchange of gifts, gratuities and entertainment is often viewed as an ordinary part of doing business, but the practice is unacceptable when it creates a sense of obligation, compromises your professional judgment or gives the appearance that it might. Be sure you understand what's acceptable and what's not.

You are permitted to accept nominal gifts that do not exceed a "minimal value" (defined as US\$250 in value) from a single source each year. Multiple gifts from a single source are permitted as long as together they do not exceed the US\$250 limit. All other gifts, including gifts exceeding the minimal value, promises of escrow accounts and promises of future gifts, violate IMG policy and should be declined and returned to the sender unless they are approved by the IMG Legal Department in writing, in advance. Accepting access to events in connection with job performance is an exception to this rule.

Please note that gifts from clients, vendors, customers, contractors, or others that are given to an IMG employee's family or close friends are considered gifts made to the IMG employee under this policy. In addition, escrow accounts and promises of future gifts violate this policy and must be reported. IMG reserves the right to require employees to decline gifts or if the gift cannot be declined, to give the gift to IMG.

You may provide business entertainment and meals that are reasonable in the context of the business and advance IMG's interests, for example, attendance at a local cultural event, a



sporting event or a business meal with a business associate (such as a customer or a supplier). However, accepting or providing tickets to an event where the business associate will not be present is not considered business entertainment but a gift and subject to the US\$250 limit described above. When providing entertainment and meals, please remember that all such hospitality should be transparent, proportionate, reasonable and bona fide.

Harassment

IMG prohibits, and will not tolerate, harassment of employees on the basis of race, color, religion, sex, age, disability, national origin, marital status, pregnancy, military status or any other status or characteristic protected by applicable law, by anyone, including any supervisor, co-worker, vendor, contractor, intern, visitor or client.

Harassment is unwelcomed verbal, physical or visual conduct, based upon a person's protected characteristic or status, that disparages or shows hostility or aversion toward the person because of such characteristic or status, and which affects the person's employment opportunities or benefits, has the purpose or effect of unreasonably interfering with the person's work performance, or has the purpose or effect of creating an intimidating, hostile or offensive working environment.

Sexual harassment is a form of harassment that has been defined to include unwelcome sexual advances, requests for sexual favors, and other verbal, physical or visual conduct of a sexual nature. Such conduct constitutes sexual harassment when (1) submission to such conduct is made either explicitly or implicitly a term or condition of the individual's employment; (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; and (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or abusive working environment. Sexual harassment can include, but is not limited to, sexual propositions, sexually suggestive terms or gestures used to describe a person's body, clothing or sexual activities, sexually oriented jokes, crude or vulgar language or gestures, display or distribution of obscene materials, and unwanted physical contact such as patting, pinching, brushing against someone's body, or other unnecessary touching.

Bullying – the misuse of power to intimidate an individual in a way which leaves them feeling hurt, vulnerable, angry or powerless – is also regarded as a form of harassment.

Examples of Harassment

- Unwanted/upsetting physical contact ranging from touching to serious physical assault.
- Unwanted/upsetting verbal and written contact such as jokes, offensive language, suggestive remarks, innuendoes or lewd comments.
- Unwanted/upsetting visual display of posters, suggestive pictures or objects, including inappropriate use of modern technology such as offensive e-mail messages, screen savers, faxes and social networking websites (such as Facebook.com, Twitter.com, Instagram and MySpace.com).
- Public humiliation, sarcasm, put-downs or ridiculing.
- Mimicking the effect of a disability.
- Ignoring, ostracizing or freezing-out.



- Derogatory comments relating to someone's age, ageist jokes and bullying behavior connected to age.

Violation of this policy will subject an employee to disciplinary action, up to and including termination.

It is the responsibility of each employee to enforce and comply with this policy. If an employee believes he or she has been harassed or have witnessed harassment in violation of this policy, the employee must notify a supervisor or Human Resources immediately. The matter will be discreetly and thoroughly investigated, and IMG will take immediate steps to stop any behavior which violates this policy and see that it does not repeat itself. If a non-employee is found to have violated this policy, IMG will also take effective remedial action to the fullest extent possible.

Employees who have experienced conduct they believe is contrary to this policy have an obligation to take advantage of this complaint procedure. An employee's failure to fulfill this obligation could affect his or her rights in pursuing any claim.

IMG strictly prohibits retaliation in any form against anyone who has reported or witnessed harassment, or who has participated in any manner in an investigation under this policy.

Harassment/Discrimination Complaint Procedures

1. Any employee who believes he/she has been the subject of any form of harassment or discrimination should report the alleged act immediately to a supervisor, or Human Resources.
2. All complaints will be handled in as timely and confidential a manner as possible.
3. Investigation of a complaint will normally include discussions with the parties involved and any witnesses. Employees will not be subjected to coercion, intimidation, retaliation, or discrimination for filing a complaint or assisting in an investigation. All employees will be expected to cooperate fully with any investigation. Please note that it is a violation of IMG's policy to not cooperate fully with any investigation.
4. If the investigation reveals that the complaint is valid, prompt remedial action will be taken.
5. If the investigation reveals that any complaint or information provided by an employee was false, the individual who provided the false information may be subject to disciplinary action.
6. If any party involved in a harassment or discrimination investigation is dissatisfied with the outcome or resolution, that individual has the right to appeal the decision. The dissatisfied party should promptly submit written comments to Human Resources. A written response will be provided following a review of the comments.

We expect that all employees will continue to act responsibly to establish and maintain a pleasant working environment free from harassment, discrimination and intimidation. The availability of this complaint procedure does not preclude individuals who believe they are being subjected to harassing conduct from promptly advising the offender that his or her behavior is unwelcome and requesting that it be discontinued.



Student Interaction Guidelines

These Student Interaction Guidelines (“Guidelines”) govern the way in which we interact with minor-age students and customers. These Guidelines are by no means an exhaustive list of every potential interaction with students. All employees must exercise sound judgment when faced with situations not specifically covered by these Guidelines.

Defining boundaries and expectations

- Teachers, coaches, and other employees should understand their roles in relation to students. They are staff members of an institution devoted to academics and athletics, not friends.
- Staff members should establish clear boundaries for the staff/student relationship.
- All behavior must meet the test of professionalism.
- Staff members must ensure that other staff members interact professionally with students.
- Staff members should avoid even the appearance of impropriety when interacting with students.
- Staff members must understand that they represent IMG 24/7.
- A staff member’s failure to establish a professional relationship and set appropriate boundaries could cost him or her the respect of students, parents, and colleagues – and possibly their job.

Dorm rooms/shower areas

- When entering a dorm room, staff members should leave the front door open until they exit the unit.
- When entering a dorm bedroom, staff members should always knock on the door first and wait for a response before entering.
- When in a dorm bedroom, the door should always be left open.
- Male staff members should not enter a female student’s room unless accompanied by a female staff member. In the event of an emergency and a female staff member is not readily available, a second male staff member should accompany the first male staff member if at all possible.
- Whenever feasible, female staff members should not enter a male student’s room unless accompanied by a male staff member. In the event of an emergency and a male staff member is not readily available, a second female staff member should accompany the first female staff member if at all possible.
- Vendors visiting IMG are not allowed to enter a dorm room unless accompanied by a staff member.
- All shower facilities on campus are for student use only, with three (3) exceptions where showers are designated for adult use only:
 - The Conference Center
 - The Center for Athletic Development
 - The Aveda Spa and Salon
- Restroom facilities within designated shower areas may be used by either students or adults.



Physical contact

- Never touch a student in a manner that might be deemed sexual or aggressive in nature. Staff members must consider each of the items listed below before having any physical contact with a student:
 - Age of student
 - Location (e.g., in public vs. in private, are others around?)
 - Context (e.g., a 6 year old with a bumped knee vs. a 15 year old with a boyfriend problem)
 - Type of touching (e.g., hugging, gentle pat on shoulder or arm?)
 - Cultural issues (e.g., what is viewed as inappropriate in the student's culture?)
- Shoulder massages, leaning over and touching, lingering touches, kisses, requesting affection (e.g., "give me a hug") are inappropriate and prohibited.
- Avoid touching students unless minimally necessary to illustrate an educational point, such as demonstrating a skill or technique, or to administer physical therapy or medical treatment.
- Staff members should never touch a student with aggression, in anger, or in frustration.

Offsite activities

- All off-campus travel with students (e.g., sporting events, medical care) must be pre-approved in accordance with applicable IMG's protocols.
- Staff members are not permitted to transport any students in a personal vehicle.
- Staff members are not permitted to house students, or have students visit their homes.
- Staff members are not permitted to have offsite personal meetings with students.
- Staff members are not permitted to employ students in any capacity.
- Staff members are not permitted to engage in any personal financial transaction with either students or parents, with only two (2) specific exceptions:
 - Reasonable tips for services rendered, which tips are reported to Human Resources per IMG policy
 - Payment for private lessons that are pre-scheduled and paid for in accordance with IMG policy
- In the absence of a parent, staff members are prohibited from participating with students in any off-campus activity other than activities that are pre-approved by Campus Life.

Student communications

- Staff members should not communicate with individual students by phone, text, or email unless the communication relates directly to academic or sport performance, or other appropriate school-related subjects.
- Staff members are strictly prohibited from entering into any online communication with an individual student.
- Staff members should not "friend" or "follow" current students on Facebook, Twitter or other social media sites.
- Staff members should not post to any website any information regarding a student that might be confidential, derogatory, or otherwise improper.
- Staff members should not share information with students or parents about other students or staff members.
- Staff members should not curse, or use language that is threatening, intimidating, harassing, or discriminatory, in communicating with students.



Examples of appropriate behavior

- Appropriate personal space.
- Reasonable eye contact.
- Reasonable reactions to exciting events.
- Appropriate comments relating to academic and social environment.
- Conferences with students focused on IMG issues.
- Fair and equal treatment of students.
- Conversations that would be appropriate for the school newspaper.

Examples of inappropriate or boundary crossing behavior

- Invading personal space; standing or sitting too close.
- Maintaining intense or lingering eye contact.
- Compliments that are personal or physical in nature (e.g., “that skirt fits you nicely” or “you should wear that top more often”).
- Initiating or condoning conversations containing sexual topics or overtones.
- Assigning student duties that meet staff’s personal needs.
- Giving or receiving a personal gift to or from a student.
- Conversations that are too personal in nature (e.g., mentor becomes confidant).
- Pattern of favoritism (e.g., writing passes too often for special students; not counting tardiness or issuing demerits; special campus privileges).
- Communicating in a way to send implied messages or evidencing secrets with the student.
- Encouraging or not discouraging loose or inappropriate talk or suggestiveness during extracurricular activities.
- Contact with students outside of normal school/school event forum (e.g., going to movies/lunch; meeting on weekends).
- Visiting a student’s home when parents are not present.
- Having a consensual relationship with a student.

Reporting obligations

- Any potential violation of this policy should be immediately reported to either the:
 - VP – Student Affairs
 - VP – Human Resources
 - Director, Campus Life
 - Managing Director of IMG
- Potential violations of this policy may also be reported via the IMG Ethics Hotline for IMG Worldwide:
 - **877-537-8685**

Any urgent situation must be immediately reported to the Manager on Duty via IMG’s emergency phone number: **941-650-1000**

Guest Interaction Guidelines

These Guest Interaction Guidelines are to be followed when interacting with IMG customers, customers’ family members or other IMG guests (collectively, “Guests”). Please note that additional guidelines are in effect with respect to students and minors. Please note that these Guidelines are in addition to the Student Interaction Guidelines in effect with respect to students and minors.



All IMG staff interactions with Guests should be restricted to IMG business. IMG prohibits social, personal, business or other relationships that are beyond professional and arm's length in nature. These guidelines are in place to avoid circumstances that have the potential to develop into problems.

Specifically, unless disclosed in advance and agreed to in writing by IMG, IMG employees and contractors are prohibited from (i) being involved in any dating, romantic or intimate interactions or relationships with our Guests, or (ii) having any personal (i.e., non-IMG-related) business or other relationship with IMG Guests.

In the event an IMG employee or contractor has an inappropriate interaction or relationship with a Guest, the employee or contractor is required to disclose such matter immediately to Human Resources.

Any violation of this policy will subject the employee or contractor to disciplinary action, up to and including termination.

Please keep in mind that other IMG policies remain applicable to interactions with IMG Guests, including the Employee Conduct and Business Ethics policy, our anti-harassment and discrimination policies, the conflicts of interest policy, and prohibitions against inappropriate gifts and gratuities. IMG staff is expected to comply with all such policies.

Gambling

Given IMG's significant role in U.S. college sports, it is our policy that IMG employees may not, directly or indirectly, engage in any form of gambling or wagering on the outcome or any other aspect of any collegiate sporting event, or solicit, induce or facilitate any other person's gambling or wagering on the outcome or any other aspect of any collegiate sporting event. This policy applies to all IMG employees at all times, whether or not you are involved in any way in IMG's college sports business and whether or not such activities would otherwise be legal. Our policy prohibits participation in any NCAA Tournament "pools" or similar activities, whether they are conducted on IMG premises or not. With respect to any other sport or event in which IMG is involved (including, but not limited to, tennis, golf, American football and soccer/football), you are responsible for being aware of and complying fully with all applicable laws and regulations as they relate to gambling and wagering, as well as the specific rules and regulations of any applicable governing body or event. If you ever have a question about these laws, rules or regulations, contact the Legal Department.

Insider Trading

Given the nature of IMG's business, IMG often has access to highly confidential "inside information." In order to prevent those with inside information from taking unfair advantage of uninformed outsiders, and in order to comply with Securities and Exchange Commission ("SEC") regulations, IMG employees are not permitted to trade securities based on inside information. IMG employees are also not permitted to divulge any inside information they discover to others, including family members or other employees.



What is a Security?

Most securities can be classified as either stocks or bonds. However, under the SEC's definition, securities include "any note, stock, . . . bond, debenture, evidence of indebtedness, certificate of interest or participation in any profit-sharing agreement, investment contract, . . . or, in general, any interest or instrument commonly known as a 'security.'" Obviously, this definition is very broad. Any employee who is unsure whether or not an item is a security should seek guidance from the IMG Legal Department.

What is Inside Information?

Information is generally considered "inside" (meaning is it material, nonpublic information) when it comes from within a corporation, is intended for corporate use, and has not yet been disclosed to the general public. The concept of an "insider" is broad – in addition to including officers and employees of a company, it can also include "temporary insiders" if they enter into a special confidential relationship with the company and as a result are given access to information solely for the company's purposes.

To be inside information, the information must be "material." This is information for which there is a substantial likelihood that reasonable investors would consider it important in making their investment decisions, or information that is reasonable certain to have a substantial effect on the price of the company's securities.

Finally, to be inside information, the information must be non-public. This means that it has not been effectively communicated to the market place. Once the information has become public, insiders and tippers (one who has received information from an insider) must wait to trade until the market has absorbed the information.

Insider Trading Prevention Procedures

Identify the information as material and non-public. Before trading for yourself or others, including investment companies or private accounts managed by third parties in the securities of a company, about which you may have potential inside information, ask yourself the following questions:

- A. Is the information material? Is this information that an investor would consider important in making his or her investment decisions? Is this information that would substantially affect the market price of the securities involved if generally disclosed?
- B. Is the information non-public? To whom, how and for what purpose has this information been provided? Has the information effectively been communicated to the marketplace by being published in Reuters, *The Wall Street Journal* or other publications of general circulation, and has it had time to be digested?

What to do if you believe the information is material and non-public. If, after consideration of the above, you believe that the information is material and non-public, or if you have questions as to whether the information is material and non-public, you should take the following steps:

- A. Immediately report the matter to the IMG Legal Department.
- B. Do not purchase or sell the securities at issue on behalf of yourself or others, including investment companies or private accounts managed by you, and do not recommend any transaction in such securities.



- C. Do not communicate the information to anyone inside or outside IMG, other than to the IMG Legal Department. In addition, care should be taken so that such information is secure.
- D. After the IMG Legal Department has reviewed the issue, you will be instructed either to continue the prohibitions against trading and communication, or you will be allowed to trade and communicate the information.

Resolving Issues Concerning Insider Trading. If you have any doubts whether information is material or non-public, or if you have any unresolved questions regarding the applicability or interpretation of the foregoing procedures or regarding the propriety of any action, you must discuss these questions with IMG's Legal Department before trading or communicating the information to anyone.

Penalties

Any employee found to have engaged in insider trading will be subject to appropriate disciplinary action, including possible termination. Employees should also be aware that the SEC has the authority to impose severe civil and criminal penalties on insider traders, and a person can be subject to penalty even if they do not personally benefit from the insider trading violation. Penalties can include disgorgement of profits, jail time, and fines of up to \$1,000,000.

If an employee has knowledge of another IMG employee participating in insider trading, it should be reported immediately to the IMG Legal Department or Human Resources. All communications received from any employee in connection with this policy will be kept confidential. Furthermore, IMG will not tolerate any form of retaliation against employees who report information in connection with this policy.

Additional Information

The information presented here is designed to give only a general overview of IMG's policy against insider trading. More comprehensive information and answers to any questions can be obtained from the IMG Legal Department.

Transportation

Only authorized IMG employees are permitted to operate IMG owned or rented cars, vans, mini-vans or IMG promotional vehicles. IMG maintains a listing of IMG staff authorized to drive IMG vehicles ("Authorized Drivers") at Guest Relations, where IMG vehicles are checked out. If a staff member is not authorized and listed as an Authorized Driver, he or she will not be able to check out an IMG vehicle. IMG will conduct regular MVR checks on all Authorized Drivers and Authorized Drivers will sign any documentation necessary to conduct such MVR checks (failure to sign any necessary documentation will result in disciplinary action up to and including termination). IMG may terminate the authorization of any Authorized Driver who has an unsatisfactory driving record. All Authorized Drivers must have a current, valid driver's license valid in the State of Florida.

Authorized Drivers are required, at IMG's expense, to take driver safety programs and to complete the National Safety Council "Defensive Driving" course.

IMG vehicles will be inspected on a regular basis to ensure that the vehicles are running properly and in safe working condition. Authorized Drivers and passengers will obey all traffic



laws and will use their seat belts at all times while traveling in IMG vehicles and IMG hired vehicles.

No Authorized Driver may use an IMG vehicle or other vehicle when in the course of employment if that driver is impaired in any fashion. IMG reserves the right to terminate the driving authorization and employment of any employee: (a) who uses drugs during work or non-work hours; (b) who uses alcohol or any other substance, including prescription medicine, that causes drowsiness or impairs his or her ability while operating a motor vehicle during work or non-work hours; (c) who operates a vehicle recklessly during work or non-work hours; or (d) who violates this policy.

Personal Appearance

Employees contribute to the good image and reputation of IMG in the way they present themselves and are expected to wear appropriate attire, including, if applicable, any assigned uniforms. When uniforms include specific shoes, watches or eye wear, some leniency will be allowed based upon personal needs (e.g., special fits, prescriptions, etc.). Requests for leniency should be discussed with the employee's department director/head. All attire, including uniforms, should always be neat and clean.

A reasonable standard of appropriate business dress does not permit employees wearing:

- Tight or overly short skirts or shorts
- Crop tops or any midriff-baring shirt
- Sheer or revealing clothing
- Shirts with slogans (other than those from IMG, or authorized IMG sponsors and authorized by the IMG Marketing Department)
- Ripped or torn clothing in need of repair
- Any extreme dress, footwear, accessory, fragrance, make up or hair
- Any visible tattoos should be appropriately covered

Employees who do not meet a professional standard may be sent home/asked to leave the premises to change and will not be paid for that time away from the employee's work location.

If there are questions about what constitutes proper attire, employees should consult their department supervisor or Human Resources.

IMG also considers daily personal hygiene and grooming as a critical part of an employee's appearance. If necessary, Human Resources or a supervisor will counsel an employee regarding dress, hygiene and/or grooming should the need arise.

Personal Information

Upon or shortly after being hired by IMG, the employee will supply Human Resources with the employee's home address, home and cell phone numbers, emergency contact information, bank details for direct deposit and other required information for employee benefits administration. Please remember to update Human Resources whenever any of this information or personal detail changes (e.g., divorce, residence change, a new beneficiary designation, etc.). Your personal details will remain confidential within Human Resources, Legal Department and/or payroll files. For business purposes, the employee's home addresses



and telephone numbers are available on a restricted basis including, but not limited to, in connection with business continuity and disaster recovery planning and activations. These records are treated as confidential and sensitive information. The employee's home telephone number will never be given out to anyone other than a person or entity authorized to receive it for business or legal purposes. Instead, someone from Human Resources will offer to call you at home with a message.

Media Policy

IMG and its employees' and clients' activities can be the subject of media scrutiny for various reasons, including the fact that many IMG employees and clients are public figures. IMG and its employees must all act to safeguard the confidentiality and good reputation of IMG, IMG employees and IMG clients.

ALL media inquiries should be directly referred to the Director, Public Relations. Employees should not allow themselves to be seen or quoted as a spokesperson for IMG without prior authorization from the Director, Public Relations. Never answer questions or discuss IMG or its clients' affairs with a third party unless you are sure of the person's identity, their purpose for making inquiries and that the information sought is information that you are authorized to give and does not breach a confidentiality obligation or this media policy. If in doubt, refer any requests for information to the Director, Public Relations.

Use good judgment when identifying yourself as an employee of IMG to any member of the media, even in circumstances where the inquiry does not directly involve IMG. Take particular caution if you are connected to a negative news event (e.g., witness to a neighborhood crime), as identifying yourself as an IMG employee could have negative business implications for IMG.

Any proposed publications, letters, articles, statements (oral or in writing), lectures or interviews should also be agreed to by IMG's Director, Public Relations in advance. The copyright of any such published information belongs to the organization and no fees will be paid to the author.

Violence in the Workplace

IMG has a zero tolerance policy for violence. If an employee engages in any violence in the workplace, or threatens violence in the workplace, his or her employment may be terminated immediately. "Violence" includes physically harming another, shoving, pushing, harassing, intimidating, coercing, brandishing weapons, or threatening to, or speaking of engaging in, those activities.

IMG specifically prohibits the possession of weapons by any employee while on IMG property. This ban includes keeping or transporting a weapon in a vehicle in a parking area, whether public or private. Employees are also prohibited from carrying a weapon while performing work and services on behalf of IMG off of the IMG campus.

As used in this policy, "weapons" include guns, knives, explosives, and any other items with the potential to inflict harm, including items that are not real, but are made to look and behave as though they are real (e.g., a plastic molded handgun or knife, or a fake explosive device). Appropriate disciplinary action, up to and including termination, will be taken against any employee who violates this violence in the workplace policy.



All employees are obligated to assist in preventing violence in the workplace and have a duty to inform and warn their supervisors, Human Resources or the Property Manager on Duty of any workplace activity, situation or incident that they observe or that they are aware of that appears to be in violation of this violence in the workplace policy. Employees can help by reporting what they see in the workplace that could indicate that a co-worker is in trouble. Employees are in a better position than their supervisor to know what is happening with those with whom an employee works. Employees are encouraged to report any incident that may involve a violation of any of the IMG policies that are designed to provide a safe and violence free workplace environment.

All reports will be investigated and information will be kept confidential. IMG employees may also use the IMG Ethics Hotline (877-537-8685) to report such conduct anonymously as set forth in the Employee Conduct and Business Ethics policy.

Tobacco-Free Workplace

IMG maintains a tobacco-free workplace. There is no smoking or use of chewing tobacco or other tobacco products on IMG's east and west campus, including grounds and parking lots; provided, however that employees at the IMG Academy Country Club may smoke in the designated smoking area outside of the main Clubhouse building.

When smoking outside of the main Clubhouse building, employees must be especially attentive to the sensitivities of fellow employees, customers and others who may object to smoking, as well as to the environment – cigarette or other ashes and butts are not to be strewn about the grounds, but rather must be placed in appropriate receptacles. Smoking breaks may take place only as approved by an employee's supervisor. Furthermore, employees from the same department should not take "smoke breaks" at the same time, so as to avoid coverage issues.

Any employee who becomes aware of anyone violating this tobacco-free workplace policy should contact his or her supervisor, or Human Resources.

Employee and Guest Property

Any items whose owner cannot be identified which are around in any part of the IMG property are to be turned into Campus Safety. Employees who take any such items off the property will be subject to disciplinary action.

Employees should not bring large amounts of money or other valuables to IMG. IMG will not be responsible for losses or thefts of, or damage to, employee property.

Drugs, Alcohol and Fitness for Duty

It is the policy of IMG to maintain a workplace that is free from the effects of drug and alcohol abuse.

Purposes

The purposes of this policy are as follows:

1. To establish and maintain a safe, healthy working environment for all employees;



2. To reduce the incidence of accidental injury to person or property; and
3. To comply with the Florida Workers' Compensation Law which encourages and regulates the implementation of a drug-free workplace program as detailed in Section 440.102, *Florida Statutes*.

Rehabilitation

1. Employees who are experiencing work-related problems resulting from drug, narcotic, or alcohol abuse or dependency may request, or be required to seek, counseling help.
2. The names, addresses, and telephone numbers of available employee assistance programs and local alcohol and drug rehabilitation programs are available from Human Resources or the Health Services Department. IMG's employee assistance program (IMPACT) services are available to employees on a confidential basis.
3. Failure to cooperate with an agreed-upon treatment plan may result in discipline, up to and including termination. Participation in a treatment program does not insulate an employee from the imposition of discipline for violations of this or other IMG policies.
4. Any reduction or elimination of discipline while an employee is receiving treatment in a substance abuse program will not be available for those who violate this policy after release from such a program.

Alcohol or Alcoholic Beverages

1. No alcoholic beverage will be brought into or consumed on the IMG campus by an employee.
2. Drinking or being under the influence of alcoholic beverages while on duty, or while on IMG's campus or work sites or while operating any IMG equipment or vehicle is prohibited.

Prescription Drugs

1. No prescription drug shall be brought onto IMG's campus or work sites by any person other than the person for whom the drug is prescribed by a licensed medical practitioner, and shall be used only in the manner, combination and quantity prescribed.
2. Any employee undergoing medically prescribed treatment with a controlled substance which may limit the employee's ability to perform on the job must report that treatment to Human Resources or Health Services just prior to beginning work. This information will be treated as confidential. It is the employee's responsibility to determine from his physician whether a prescribed drug may impair job performance.

Illegal Drugs

1. The term "drug" means alcohol, including distilled spirits, wine, malt beverages and intoxicating liquors; amphetamines; cannabinoids; cocaine; phencyclidine (PCP); hallucinogens; methaqualone; opiates; barbiturates; benzodiazepines; synthetic narcotics; designer drugs; or a metabolite of any of the substances herein.
2. The use of an illegal drug or controlled substance on IMG's campus or work sites or while operating a vehicle, machinery, appliance or other equipment is prohibited.



3. The illegal use of drugs off the job and away from IMG's campus is not acceptable because it can affect on-the-job performance, as well as the confidence of the public in the ability of IMG to meet its responsibilities. Such conduct may be grounds for discipline, up to and including termination.
4. The illegal possession, sale, trade or delivery of drugs by an employee to another person is prohibited.

Job Applicants

1. A person presently using illegal drugs or having a history of alcohol or drug dependency will not be hired unless there is evidence of rehabilitation satisfactory to IMG.
2. As a condition of hiring, all individuals who have applied for, and who have been offered employment with IMG will be required to take a pre-employment drug test. Individuals who test positive for illegal drugs will not be hired. Such individuals may not reapply for employment with IMG for 6 months.

Other Testing

1. IMG will require an employee to submit to a breath, blood or urine test where reasonable suspicion exists that the employee is using or has used alcohol or drugs in violation of this policy. "Reasonable suspicion" means something more than mere suspicion. It means a belief that an employee is using or has used drugs in violation of IMG's policy, drawn from specific, objective and articulable facts and reasonable inferences drawn from those facts in light of practical experience. Among other things, reasonable suspicion may be based upon:
 - a. Observable phenomena while at work, such as direct observation of drug use or of the physical symptoms or manifestations of being under the influence of a drug;
 - b. Abnormal conduct or erratic behavior while at work or a significant deterioration in work performance;
 - c. A report of drug use, provided by a reliable and credible source, which has been independently corroborated;
 - d. Evidence that an individual has tampered with a drug test;
 - e. Information that an employee has caused, contributed to, or been involved in an accident while at work; or
 - f. Evidence that an employee has used, possessed, sold, solicited, or transferred drugs while working or while on the campus or work site of IMG or while operating an IMG vehicle.
2. An employee who tests positive in any drug test given under this section will be subject to counseling or disciplinary action, up to and including termination of employment. Refusal to submit to a test given under this section, when requested to do so by Human Resources, shall be grounds for termination of employment.

Testing Procedure

The IMG testing facility currently is Quest Diagnostics. Test results will be reported to and evaluated by the IMG Medical Review Officer ("MRO"). The IMG MRO currently is:



Medical Toxicology Consultants
9210 Florida Palm Dr.
Tampa, Florida 33619
(813) 246-4277

IMG reserves the right to substitute additional testing facilities and Medical Review officers.

Loss of Workers' Compensation Benefits

It is a condition of employment that each employee refrains from taking drugs on or off the job. Employees who test positive for drugs or refuse to submit to a test for drugs may forfeit all rights to Workers' compensation benefits.

Drugs for Which IMG Will Test

A list of all drugs for which IMG will test, described by brand names or common names (where applicable), as well as by chemical names, is as follows: alcohol, including distilled spirits, wine, malt beverages, and intoxicating liquors, amphetamines; cannabinoids, cocaine, phencyclidine, hallucinogens, methaqualone, opiates, barbiturates, benzodiazepines, synthetic narcotics, designer drugs, or a metabolite of any of the substances listed herein.

Use or Prescription or Nonprescription Medication Before and After Tests

A list of medications which may alter or affect a drug test will be made available to all employees and job applicants. In addition, all employees and job applicants shall have the right to consult the testing facility of IMG for technical information regarding prescription and nonprescription medication.

Confirmatory Tests; Employee Explanation

Any employee or job applicant who receives a positive confirmed test result may contest or explain the result to the MRO within five (5) working days after written notification of the positive test results.

Safety of Workforce

In order to ensure the safety of IMG's campus, workplace and employees and to maintain a work environment free of illegal drugs and alcohol, IMG reserves the right to require an employee to submit to a search where there is a reasonable suspicion of violation of this policy, as defined above. Upon reasonable suspicion, of a violation of this policy, and at the discretion of IMG, employee lockers, vehicles, packages and pocketbooks or other related personal items may be searched without prior notice to ensure a workplace free of drugs or alcohol. Any employee found to have alcohol; illegal drugs or drug paraphernalia in his/her locker, vehicle or personal effects will be subject to immediate disciplinary action up to and including termination. Any employee who refuses to cooperate with a request to submit to a search made by an authorized company official (e.g., Property Manager on Duty or Human Resources etc.) will be subject to disciplinary action, up to and including termination.

Confidentiality

Requests for rehabilitation, either by IMG or an employee, test results and information relating to the diagnosis or rehabilitation of employees will be treated as confidential by IMG. Disclosure of that information will be limited to those IMG officials who need to have such information in order to be able to perform their duties and responsibilities. Any employee who discloses



confidential information in violation of this policy will be subject to discipline up to and including termination.

Employee's Duty to Report

1. It shall be the responsibility of each employee who observes or has knowledge of another employee in a condition which impairs their ability to perform their job duties, or who poses a hazard to the safety and welfare of others, or is otherwise in violation of this policy, to promptly report that fact to their immediate supervisor, the Manager on Duty or Human Resources.
2. Employees subject to the Drug-Free Workplace Act who are convicted of any criminal drug violation occurring in the workplace must report the conviction to Human Resources within five (5) days of the conviction.
3. Any employee or job applicant, who brings any action under Section 440.102 *Florida Statutes*, must promptly report that fact to the testing facility of IMG Academy.

General Fitness for Duty

In an effort to ensure that employees are generally fit for performance of job responsibilities, periodic medical examinations may be required. In that event, a drug test will be administered as part of such medical examinations.

Workplace Searches

IMG reserves the right to question employees and all other persons entering and leaving IMG's campus and other IMG property, and to inspect any vehicles, packages, parcels, purses, handbags, briefcases, lunchboxes, or any other possessions or articles carried to and from IMG's property in order to: (a) safeguard the persons or property of IMG, its employees, its clients, or its guests, (b) help prevent the possession, sale, and use of alcohol and illegal drugs on IMG's campus, in keeping within the spirit and intent of IMG's drug-free workplace policy, or (c) avoid the use of weapons or hazardous substances.

In addition, IMG reserves the right to search any employee's office, desk, files, locker, vehicle or any other area or article on IMG's campus. In this connection, it should be noted that all offices, desks, files, lockers, and other IMG property are issued for the use of employees only during their employment with IMG. Inspections may be conducted at any time at the discretion of IMG with or without notice to employees.

Persons entering the campus who refuse to cooperate in an inspection conducted pursuant to this policy will not be permitted to enter the campus. Employees working on or entering or leaving the campus who refuse to cooperate in an inspection, as well as employees who, after the inspection, are believed to be in possession of stolen property, weapons, alcohol or illegal drugs, or other prohibited materials may be subject to disciplinary action.



Section III: Electronic Media

Computer Use

IMG is part of an international organization with offices all over the world. IMG and IMG employees must be protected from potential losses due to careless, malicious or unethical use of data and equipment. IMG-issued computers, hardware, software, email, mobile and land lines should be used for conducting business on behalf of IMG.

IMG may and does monitor all electronic and data messages and reserves the right to intercept and review those messages at any time without notice. All communications and information transmitted by, received from, or stored in these systems is the property of IMG and there is no expectation of personal privacy with respect to such information.

Internet

User Responsibilities

Employees are provided access to the Internet for the purpose of furthering IMG's business. The Human Resource department is authorized to monitor Internet use by IMG employees and investigate potential abuse.

Employees may not use the Internet in a manner that might be harmful in any way to the business interests of IMG, its students, business partners and/or clients. In addition, employees must not duplicate or download any software or materials without the prior approval of the IMG IT Department (and not HCL or any successor provider). Examples of non-approved Internet use include, but are not limited to, online games; gambling; pornographic, sexually explicit, or suggestive material; illegal activity (e.g., drug-related); locating or downloading any material of an offensive nature in regard to race, gender, religious or sexual orientation, national origin, age, or disability.

Security and Access

Employees who use the Internet must follow all existing IMG policies relating to confidentiality, e-mail and software usage. Monitoring technology and procedures are in place, and IMG reserves the right to intercept or monitor the Internet access of individual employees, as well as gain access to any and all communications where IMG management deems it appropriate or necessary. The IMG IT Department reserves the right to withdraw Internet service without notice for any reason or no reason, including in the event of a suspected security violation or where it is believed IMG networks and/or computer systems are at risk.

Mobile, Data/Text and Telephone Usage

IMG mobile, data, and land telephone lines are for conducting business of IMG. These phones, including voicemail and phone logs, are the property of IMG and maybe monitored at any time by IMG. Personal calls, both incoming and outgoing, should be limited in duration and optimally be made during a break or non-working hours.



Certain employees, as approved by senior leadership, may be permitted to participate in IMG's mobile phone program. Separate documentation will be given to these approved individuals and the list of approved individuals will be reviewed annually. However, any IMG employee using a mobile phone in the furtherance of IMG business is expected to follow certain procedures regarding safe and legal mobile phone use. Further, each such employee must sign an acceptable use policy that contains the terms of use of IMG mobile phones/devices and return it to the IMG IT Department in New York.

Employees are at all times solely responsible and liable for the safe and legal use of their mobile phones. Employees must not receive or place text messages, surf the internet, receive or respond to email, check phone messages or any other purpose related to their employment while operating a personal or company vehicle including, but not limited to, a bus, van, golf cart or tram. All employees must follow the local, state or federal laws for mobile phone usage. IMG will not be liable for any damages for which an IMG employee may be liable due to the violation of this policy. Violations of this policy will subject employees to disciplinary action.

Social Media Guidelines

Use of social media presents certain risks, and carries with it certain responsibilities. To assist IMG staff in making responsible decisions about their use of social media, IMG has established these social media guidelines. These guidelines apply to all IMG's staff, including full time, part time, and seasonal staff, as well as interns.

Guidelines

Social media includes all means of communicating or posting information or content of any sort on the Internet, including to an employee's own or someone else's web log or blog, journal or diary, personal website, Twitter or Facebook account, social networking or affinity web site, web bulletin board or chat room, as well as any other form of electronic communication, whether or not associated or affiliated with IMG.

Know and follow the rules

Handbook policies, including, without limitation, IMG's conduct expectations, the student interaction guidelines, violence free workplace policy, employment discrimination and harassment policies are applicable to all employee communications whether or not in the course of employment, and ensure employee postings are consistent with these policies. Inappropriate postings that include discriminatory remarks, harassment or threats of violence or similar inappropriate or unlawful conduct or, posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion or any other status protected by law or company policy, will not be tolerated and may subject an employee to disciplinary action up to and including termination.

Honesty

Employees should be honest when posting information or news and if an employee makes a mistake, correct it quickly. An employee should remember that the Internet archives almost everything; therefore, even deleted postings can be searched. Never post information or rumors that an employee knows to be false about IMG, fellow employees, interns, contractors, clients, customers, suppliers, guests and people working on behalf of IMG or competitors.



Post only appropriate, ethical and respectful content:

- Always consider the power of comments and contemplate the impact of a post on a person's reputation and that of IMG before publishing it.
- Maintain the confidentiality of IMG Trade Secrets and private or Confidential Information. Trade Secrets may include information regarding the development of systems, processes, products, know-how, pricing and technology. Do not post internal reports, policies, procedures or other internal business related confidential communications including non-public information related to IMG ownership.
- Respect financial disclosure laws. It is illegal to communicate or give a "tip" on inside information to others so that they may buy or sell stocks or securities.
- Do not create a link from a blog, website or other social networking site to an IMG website without being identified as an IMG employee.
- An employee should never be represented as a spokesperson for IMG. If IMG is a subject of the content being created, be clear and open about the fact that the person posting is an employee, and make it clear that the views expressed do not represent those of IMG, fellow employees, clients, contractors, interns, customers, suppliers, guests or people working on behalf of IMG. It is best to include a disclaimer such as "The postings on this site are my own and do not necessarily reflect the views of IMG."
- Do not use IMG logos or trademarks, and do not refer to clients, partners or suppliers without their approval.

Using social media at work

Refrain from using social media while on work time or on equipment IMG provides, unless it is work-related as authorized by the employee's manager or consistent with the IMG equipment policy. Do not use IMG email addresses to register on social networks, blogs or other online tools utilize for personal use.



Section IV: Attendance and Related Procedures

Attendance

Employees are expected to report to work on time each workday in accordance with their established work schedules. If an employee is unable to work because of illness or reasons other than an authorized medical or other leave, the employee should personally notify his or her supervisor on each day of absence at least two (2) hours before the time when the employee is to report to work. IMG reserves the right to ask the employee for medical documentation of the absence upon the employee's return to work after any absence due to illness or injury.

Frequent or extended absence, even through legitimate, impairs the operation of the employee's department. If an excessive pattern exists of unexcused absence, an employee may be disciplined or discharged. If you are absent for three scheduled days in a row without calling your supervisor, you will be considered to have voluntarily terminated your employment with IMG.

It is also expected that an employee obtain permission from their supervisor when circumstances arise requiring an extended meal break or early departure from work. Frequent late arrivals, early departures from work or repeated long meal breaks will be addressed by the employee's immediate supervisor and/or Human Resources and may subject the employee to disciplinary actions up to and including termination.

In the event where an employee has an unscheduled late arrival to work, the employee is expected to speak with their supervisor within thirty (30) minutes of their regularly scheduled start time and explain the circumstances of the delay. Frequent late arrivals to work will be addressed by the employee's immediate supervisor and/or Human Resources.

Attendance and punctuality levels reflect on an employee's overall responsibility and dependability. They are reviewed and considered during periods of compensation review.

See the "Family and Medical Leave Act" policies for information on absences due to illnesses requiring an absence from work for more than three (3) consecutive workdays.

Classifications of Employees

Unless otherwise provided by a written contract signed by the Managing Director, all employees are employed on an "at will" basis. Accordingly, continued employment with IMG is based on the mutual consent of both the employee and IMG. Either the employee or IMG may terminate the employment relationship at any time and for any or no reason unless specifically prohibited by applicable law.

None of the policies contained in this handbook are intended to create, nor should they be construed to create, any expectation or guarantee of continued employment for any length of time. No written or oral representation by IMG employees is intended to create a contract of employment. No employment practice of IMG is intended to create a contract of employment.



Any change in the at will employment policy must be executed in writing and signed by the Managing Director.

There are different classifications of employees at IMG. Those employee classifications are as follows:

1. **Full-time:** A full-time employee is one who works a workweek of at least thirty-five (35) hours on a regular basis. This includes exempt (salaried) and non-exempt (hourly) employees. Non-exempt employees are eligible for overtime compensation and must turn in a weekly timesheet. Exempt employees do not receive overtime pay.
2. **Part-time:** A part-time employee is a non-exempt employee who works less than a thirty (30) hour workweek on a regular basis. Part-time employees are eligible for overtime compensation and must turn in a weekly timesheet. Benefits eligibility will be subject to IMG benefits policies.
3. **Temporary:** A temporary employee is a non-exempt employee who is hired for a specific period of time or a particular project. A temporary employee may be offered and may accept a new temporary assignment with IMG and thus still retain temporary status. Temporary employees are eligible for overtime compensation and must turn in a weekly timesheet. Benefits eligibility will be subject to IMG benefits policies.

Independent Contractors

From time-to-time, IMG engages the services of independent contractors. Prior approval by the Vice President, Human Resources, is necessary to determine whether the individual will be engaged as a temporary employee or independent contractor.

Recording Work Hours

IMG uses a computerized timecard system called "Timesaver" for non-exempt employees to record their work hours. All non-exempt employees must complete a weekly timesheet in Timesaver, prepared in accordance with the following guidelines:

IMG prohibits working off the clock. It is very important that your timesheets reflect the exact time when an employee begins and ends the working day and takes meal breaks or other authorized breaks during which the employee leaves the IMG property. The times listed on a timesheet should not include time when an employee delays work until after their official start time to handle personal business. An employee who falsifies their timesheet will be disciplined, up to and including termination.

In addition, it is a serious violation of policy for any supervisor or leader to give you any direction or encouragement, either explicitly or implicitly, to work off the clock. If this ever occurs you must immediately report this to Human Resources. If you are uncomfortable reporting the situation you can also report it by calling the IMG Ethics Hotline for IMG Worldwide: 877-537-8685.

Approval must be obtained prior to working any overtime. Non-exempt employees are paid based on an hourly rate and will only receive overtime for hours worked over forty (40) during the week. Employees should not work through meal breaks unless it is necessary AND approved prior to the occurrence. The supervisor for whom the work was performed must include a note of explanation on the Timesaver timesheet.



With the approval of the employee's supervisor, a full-time non-exempt employee may take time off to attend a personal appointment or medical appointment during the working day. Further, with the approval of employee's supervisor, the employee may make up the missed time. However, time that is considered make-up time must be performed in the week of the absence. If the time is not made up in the week of the absence, the employee will have either four (4) or eight (8) hours of time deducted from his or her PTO days (four (4) hours will be deducted for missed time of four (4) hours or less per day and eight (8) hours will be deducted for missed time of greater than four (4) hours per day).

We recognize the needs of new mothers and provide a reasonable unpaid break time for employees needed to express breast milk for their nursing child for up to one year from the child's date of birth. We provide private office space that will shield the employee from view and will be wholly free from coworker or public intrusion. If such need arises, simply contact human resources and necessary breaks and corresponding office space will be provided.

Overtime

The overtime policy applies to all non-exempt employees.

The IMG work week begins at 12:01 a.m., Sunday morning, and concludes at 11:59 p.m., Saturday night, local time. Non-exempt employees must work over forty (40) hours in one (1) work week in order to qualify for overtime. Once forty (40) hours of work have been performed in that work week, all other hours worked during that same work week will be calculated a time and one-half of the non-exempt employee's base rate of pay.

Company holidays, PTO days, floating holidays, and bereavement days will not be included in the calculation of the forty (40) hours of actual work that must be accrued prior to overtime being paid. Instead, the hours allocated to the holiday, PTO day, floating holiday, or bereavement day will be paid as straight time.

As described in the Recording Work Hours section, timesheets must be filled out on a weekly basis. Overtime hours are to be recorded by the employee on their weekly timesheet. All overtime must be approved in advance by the employee's supervisor in order to be approved by Human Resources and recognized by Payroll.

Pay Guidelines

IMG employees are paid on a semi-monthly basis, on the 15th and the last day of each month. If these days fall on a Saturday, Sunday, or holiday, the payday will be the preceding workday.

All required deductions, such as federal, state and local taxes and all authorized voluntary deductions, such as health insurance contributions, will be automatically withheld from paychecks.

IMG encourages employees to elect to have direct deposit of their paychecks into a bank or savings association. The program may not support deposits to all investment firms. Please note, however, that the first paycheck is always a "live check" and is not direct deposited.



Paychecks for employees who do not elect to have direct deposit and earning statements/pay stubs for employees who elect to have direct deposited checks are mailed to the employee's address on record with Human Resources.

An employee should report a lost or stolen paycheck or direct deposit to Human Resources immediately. IMG will issue a new paycheck to the employee after payment is stopped on the original check. However, if a check is lost through no fault of IMG and IMG is unable to stop payment on the check, IMG is not obligated to indemnify the employee for the loss.

Employees should review their pay stub for errors. If there is an error on the pay stub, the employee should notify Human Resources immediately.

It is IMG policy to comply with the salary basis requirements of all existing wage laws. Therefore, we prohibit anyone from making any improper deductions from employees who are not eligible for overtime. If you believe that an improper deduction has been made to your salary, you should immediately report this information to your direct supervisor, or to Human Resources. Reports of improper deductions will be promptly investigated. If it is determined that an improper deduction has occurred, you will be promptly reimbursed for any improper deduction made.

Family and Medical Leave

Eligibility

Those employees who have been employed by IMG for at least twelve (12) months and who have worked at least 1,250 hours in the previous twelve (12)-month period will be eligible for an FMLA leave under the terms of this policy, except as otherwise set forth in the Exceptions section of the policy. FMLA entitles eligible employees to take up to twelve (12), sometimes twenty-six (26), weeks of unpaid, job-protected leave in a twelve (12)-month period for specific family and medical reasons. The twelve (12)-month period will be measured backward from the date any employee's first FMLA leave begins. An employee who does not meet the service and hours worked requirements may request a leave of absence; the merits of such a request will be reviewed on a case-by-case basis.

Leave Entitlement

Employees will be entitled to receive a total of twelve (12) workweeks of leave during the twelve (12)-month period for one (1) or more of the following:

1. Because of a serious health condition that has rendered the employee unable to perform the functions of the employee's job (see Certification of Serious Health Condition); or
2. Birth of a child, adoption of a child, or to become a foster parent to a child in order to care for such child. A leave to care for a newborn, adopted, or foster child may only be taken within twelve (12) months of the child's birth or placement into the employee's home; or
3. Paternity leave to care for an employee's newborn, adopted or foster child. A leave to care for a newborn, adopted, or foster child may only be taken within twelve (12) months of the child's birth or placement in the employee's home; or
4. To care for a spouse, parent, or child with a serious health condition. (Note that FMLA defines "spouse" as a husband or wife). Regulations also include as "spouses" common law partners in states that recognize those types of legal relationships. IMG will review, on a case-by-case basis, coverage to care for other relatives or non-family members who have shared a household with an IMG employee for over one (1) year. A "child" is defined



as a son or daughter who is a biological, adopted, foster child, stepchild, legal ward, or a child of a person standing *in loco parentis*. A child must be either under the age of 18 or, if older; incapable of self-care due to a disability that limits one (1) or more “major life activities.” A “parent” is any person who is the biological parent of an employee or who stands or stood *in loco parentis* to the employee when the employee was a child. Parents-in-law are not included within the meaning of parents.

5. For employees with a spouse, child, parent, or next of kin in the National Guard or military Reserves, to use for any qualifying exigency arising from that family member’s call to or being on active duty status of foreign service in support of a contingency operation. A “qualifying exigency” may include a short-notice deployment, military events and related activities, urgent childcare and school activities, financial and legal arrangements, counseling, rest and recuperation, or post-deployment activities.

If both husband and wife are employed by IMG, they will be eligible for a combined total of twelve (12) weeks’ leave in cases that do not apply to their own personal medical conditions.

Employees will be entitled to receive a total of twenty-six (26) work weeks of leave during the twelve (12)-month period for the following:

1. To care for a family member, including a spouse, child, parent, or next of kin, who is a current member of the Armed Forces, National Guard, or Reserves and who has a serious illness or injury incurred in the line of duty on active duty and which renders the family member medically unfit to perform his or her military duties; or for which the family member is undergoing medical treatment, recuperation or therapy; or is in outpatient status; or is on the temporary disability retired list. For purposes of this policy, “next of kin” means the nearest blood relative other than an employee’s spouse, parent, or child.

Notification

If the necessity of leave is foreseeable at least thirty (30) days in advance, such as an expected birth or adoption, the employee shall provide the IMG Cleveland Benefits office or the IMG Human Resources office with at least thirty (30) days’ written notice before the date when the employee intends to take leave. If the necessity of leave has not been foreseen thirty (30) days in advance, the employee shall comply with IMG’s regular call-off procedures and give notice as part of the call-off.

Certification of the Reason for the Leave

Each employee applying for a leave in connection with a serious health condition must substantiate this leave request by providing, at least thirty (30) days in advance or as soon as reasonably practicable (usually in one (1) or two (2) business days), a written certification from the employee’s health care provider. Forms for this purpose can be obtained from the IMG Cleveland Employee Benefits office or the IMG Human Resources office. The certification should include:

- The commencement date and the expected length of the serious health condition.
- The pertinent medical facts substantiating the condition.
- The reason why the employee must be the caregiver when a spouse, child, or parent is incapacitated.
- Whether the employee is unable to perform his or her job duties.



Each employee applying for leave in connection with a qualifying exigency must substantiate this leave request by providing, at least thirty (30) days in advance or as soon as reasonably practicable, a written certification of the reason for the leave. Forms for this purpose can be obtained from the IMG Cleveland Employee Benefits office or the IMG Human Resources office. The certification should include:

- The qualifying reason for the leave.
- The expected amount of leave needed.
- Certification from any third-parties involved in the reason for the leave.

Each employee applying for leave in connection with caring for a injured service member must substantiate this leave request by providing, at least thirty (30) days in advance or as soon as reasonably practicable, a written verification of the need for the leave. Forms for this purpose can be obtained from the IMG Cleveland Employee Benefits office or the IMG Human Resources office. The certification should include:

- The qualifying reason for the leave.
- Pertinent information about the medical status of the service member.
- Description of the need for a family member to care for the service member.

If an employee fails to explain the reason, the leave may be denied. Failure to provide timely notice may result in a delay in or denial of leave and/or cause the absence to be considered as unexcused, which may subject the employee to disciplinary action up to and including termination. Once a leave request has been granted, periodic recertification may at times be necessary to document the continuing need for a leave.

Any expense associated with the original certification will be the sole responsibility of the employee. If the IMG Cleveland Employee Benefits office representative requests a second opinion, the expense of such opinion will be borne by IMG. The second opinion will be provided by a qualified health care professional chosen by the IMG Cleveland Employee Benefits Office representative. Conflicts between the first and second opinions will be resolved by a third opinion paid for by IMG. The health care provider who supplies the third opinion will be jointly selected by both the employee and by the IMG Cleveland Employee Benefits Office representative. The opinion rendered by the third health care provider will be binding on both parties.

A certification to return to work for an employee who has been out on their own medical leave must be provided from the employee's health care provider. The statement must be delivered to the IMG Cleveland Employee Benefits office or the IMG Human Resources office in order for an employee to return to work. An employee who has been on leave for a family member, other than themselves, does not need a return-to-work notification.

For purposes of this policy, a serious health condition means an illness, injury, impairment, or physical or mental condition that involves:

- Any period of incapacity or treatment in connection with or consequent to inpatient care; or
- Any period of incapacity requiring absence from work, school, or other regular daily activities of more than three (3) calendar days, when a visit to the doctor occurs within seven (7) days of the first day of incapacity and is followed by a second or additional



visits to the doctor within the next thirty (30) days or involves continuing treatment by, or under the supervision of, a health care provider; or

- Continuing treatment by, or under the supervision of, a health care provider for a chronic or long-term health condition that is incurable or so serious that, if not treated, would likely result in a period of incapacity of more than three (3) calendar days and involves at least two (2) visits to a healthcare provider per year; or
- Prenatal care.

Intermittent Leave

Employees requiring leave due to a serious health condition may opt to take the time either intermittently or pursuant to a reduced work schedule if it is certified by the health care provider as medically necessary to do so.

Employees may also take intermittent leave whenever medically necessary to care for a spouse, parent or child provided that all documentation and requests are in order.

Employees must confer with their supervisor(s) and make reasonable effort to schedule the leave so as not to unduly disrupt IMG's business operations.

Return to Work

Upon returning from leave, most employees will be restored to the position they held prior to the leave or to a position with equivalent pay, benefits and other terms and conditions of employment provided the actual leave lasts for twelve (12) weeks or less, or twenty-six (26) weeks or less if taken to care for a service member. Individuals seeking to return to work must notify the IMG Cleveland Employee Benefits office or the IMG Human Resources office as far in advance as possible to arrange a return-to-work date.

Certain key employees may not have the option of returning to their positions. If leaving the position of a highly compensated employee open would cause an undue economic hardship for IMG, IMG may replace the employee and terminate the employee. An individual so affected will be notified before taking a leave, provided the employee has given notice of the leave in advance.

In cases where it is necessary for an employee to remain off work for more than twelve (12) weeks due to their serious health condition, IMG may replace the employee.

Benefits

IMG shall maintain coverage under any health care plan for the duration of the leave under the terms that would have applied had continuous employment been maintained. Employees will be expected to timely pay any applicable premiums during the course of the leave. Employees not returning to work will be expected to make proper restitution for premiums not paid by them. Exceptions may be made if the failure to return to work is due to a continuation, recurrence, or onset of a serious health condition, where a key employee has been notified that reinstatement will be denied, or due to some other circumstances beyond the employee's control.

Benefits accrued prior to the commencement of leave shall be retained by the employee.



Exceptions

- Employees working in offices with fewer than fifty (50) employees within a seventy-five (75)-mile radius will not be eligible for leave under this policy. IMG reserves the right to grant individual requests for leave to employees working in offices with fewer than fifty (50) employees at its discretion.
- Certain key employees may not be eligible to return to work as outlined in Return To Work.

The policy does not supersede existing applicable state laws that provide greater family and medical leave benefits than those contained in this policy.

Administration

Administration of this policy will be the responsibility of the Vice President of Employee Benefits. The IMG Cleveland Employee Benefits office representative will notify employees requesting leave whether they are eligible for FMLA, their rights and responsibilities if eligible, or the reason for ineligibility. The IMG Cleveland Employee Benefits office representative will also notify employees when and how much requested leave is designated as FMLA, or the reason requested leave is not designated as FMLA. IMG will not interfere with, restrain, or deny the exercise of any right provided under the FMLA, not discharge or discriminate against any person for involvement in a proceeding related to FMLA. Contact the IMG Cleveland Employee Benefits office for further information.

Any employee may file a complaint with the U.S. Department of Labor or bring a private lawsuit to enforce rights under the FMLA. This policy does not affect any Federal, state, or local law regarding employment discrimination, not supersede any state or local law which provides greater family or medical leave rights.

Short-Term Disability

Full-time employees who have worked for IMG for at least 30 days are automatically eligible for Short-Term Disability (“STD”). If you are disabled due to sickness or as the result of a non-work-related injury, and receiving care for your sickness or disability, you can receive up to 26 weeks of pay, after which long-term disability payments would potentially begin.

After one year of service, full-time employees earn 2 weeks of STD payments at 100% of base salary. Thereafter, employees earn 1 week of STD (at 100% of base salary) for each year of service, up to a maximum of 6 weeks. After utilizing whatever weeks you have available at 100% pay, STD benefits are then available at 66-2/3 base pay until the 26-week STD maximum is exhausted.

STD benefits will be paid by IMG solely based on medical determinations provided by MetLife. Benefits at the active employee rate continue through the STD period. STD benefits are also eligible for 401(k) contributions, and constitute wages for purposes of the IMG 3% non-elective contribution.

Benefits end at the earliest of

- the maximum benefit period
- the date the employee is no longer disabled
- the date of the employee’s last day of employment



- the date employee dies
- the date the employee fails to have medical exam requested by MetLife
- the date the employee fails to provide proof of disability.

Paid Time Off

Eligibility

All full-time employees are eligible for Paid Time Off (“PTO”).

PTO days are accrued on a calendar year basis beginning each January 1 and ending each December 31. PTO days do not carry over from year to year and must be taken in the calendar year in which they are earned. PTO days are accrued as of the last day of each month.

Employees may use their PTO days at any time throughout the calendar year (except as described below) even if they have not yet accrued them. However, if an employee leaves IMG employ having used more PTO days than he or she has accrued at the time of departure, the amount of payment for any unearned but used PTO days will be deducted from the employee’s final paycheck or refunded to IMG if the employee has left.

The PTO accrual rate for the first calendar year of service is based upon the employee’s date of hire. The PTO accrual rate for subsequent calendar years is based on the employee’s years of service.

For the first calendar year of employment, PTO days are accrued at a rate of one (1) day per month. (PTO days accrue as of the last day of the month.) Listed below are the numbers of PTO days that may be accrued by an employee during the first calendar year of employment. Keep in mind that if an employee leaves IMG having used PTO days that have not accrued, the payment for the PTO days used but not accrued will be deducted from the employee’s final paycheck.

Month of Hire	PTO Days That Will Be Accrued by December 31
January	12
February	11
March	10
April	9
May	8
June	7
July	6
August	5
September	4
October	3
November	2
December	1

For the second through fifth calendar years of employment, PTO days are accrued at a rate of one and one-half (1.5) days per month, for a total of eighteen (18) PTO days per calendar year.



(PTO days accrue as of the last day of the month.) Listed below are the numbers of PTO days that are accrued each month by an employee during the second through fifth calendar years of employment. Keep in mind that if an employee leaves IMG having used PTO days that have not accrued, the payment for the PTO days used but not accrued will be deducted from the employee's final paycheck.

Month	PTO Days Accrued
January	1.5
February	3.0
March	4.5
April	6.0
May	7.5
June	9.0
July	10.5
August	12.0
September	13.5
October	15.0
November	16.5
December	18.0

On the date an employee begins his sixth year of employment, PTO days will accrue at the rate of two days per month for the remainder of that calendar year and for subsequent calendar years. Listed below are the numbers of PTO days that are accrued each month by an employee for the calendar years following his/her sixth year of employment. Keep in mind that if an employee leaves IMG having used PTO days that have not accrued, the payment for the PTO days used but not accrued will be deducted from the employee's final paycheck.

Month	PTO Days Accrued
January	2
February	4
March	6
April	8
May	10
June	12
July	14
August	16
September	18
October	20
November	22
December	24

For part-time employees whose classification changes from part-time status to full-time status, the date of the classification change to full-time status will be the date used for calculating years of service for PTO eligibility; provided, however, that, if the part-time employee has been employed by IMG for at least one (1) year prior to the change to full-time status, the employee will be eligible for one and one-half (1.5) PTO days per month during the first calendar year of full-time employment instead of one (1) PTO day per month.



Using Vacation

PTO days may be taken in full day (eight (8) hour) or half day (four (4) hour) increments. Payment for PTO days will consist of the employee's regular pay and will be paid on the usual payday. Employees will not be permitted to receive pay for PTO days before the days are used.

Employees must schedule PTO days in advance with their supervisor, unless the PTO day is used for an unforeseen medical condition of the employee or the employee's immediate dependent. Approval of PTO requests is subject to the needs of the business and supervisors are responsible for ensuring adequate staffing levels. PTO requests are approved once signed by the employee's supervisor.

Employees will not receive PTO pay in lieu of time off. In addition, employees will not be paid for any unused PTO remaining at the end of the year. When employment is terminated, employees will not receive pay for any unused PTO.

IMG reserves the right to require employees to submit documentation of illness, injury, or treatment at any time. Employees not furnishing documentation when requested will not be entitled to use PTO for the absence and may be subject to disciplinary action. PTO days may be used by employees who are on Family Medical Leave in order to continue pay during a period of leave. Please refer to the FMLA policy for further information.

Holidays

IMG reviews paid holidays on an annual basis, but normally observes the following paid holidays:

New Year's Day	Labor Day
Memorial Day	Thanksgiving Day
Independence Day	Christmas Day

Holidays are paid as follows:

Non-exempt (Hourly) Employees

Full-time, non-exempt employees are eligible for holiday pay, provided they work their regularly scheduled shifts the workday before and the workday after the paid holiday. Any approved PTO day is considered a workday for purposes of holiday pay eligibility.

Holiday Pay if Non-exempt Employee Works on the Holiday:

The employee will receive payment for actual hours worked plus eight (8) hours of holiday pay equal to their straight time hourly rate.

Holiday Pay if Non-exempt Employee Does Not Work on the Holiday:

The employee will receive eight (8) hours holiday pay equal to their straight time hourly rate.

Part-time and Temporary non-exempt employees are eligible for holiday pay only if they work on the holiday. In addition, the employee must work their regularly scheduled shifts the workday before and the workday after the holiday. The employee will receive payment for actual hours



worked plus holiday pay equal to their straight time hourly rate for the hours of their regular shift up to a maximum of eight (8) holiday hours.

Exempt (Salary) Employees

Full-time, exempt employees are eligible for holiday pay provided the employee works his or her regularly scheduled shift the workday before and after the paid holiday. Any approved PTO day is considered one (1) day worked for purposes of holiday pay eligibility.

Holiday Pay if Exempt Employee Works on the Holiday:

The employee will receive an equal number of compensatory hours off. Any compensatory hours off must be taken by the end of the calendar year in which the holiday occurs or it is forfeited. A written request to use these compensatory hours must be submitted to the employee's supervisor in advance and is subject to the employee's supervisor's approval.

Holiday Pay if the Exempt Employee Does Not Work on the Holiday:

The employee will receive holiday pay equal to one (1) full day's pay.

Holiday Pay if a Holiday Falls on a Saturday or a Sunday:

If a holiday falls on a Saturday, full-time employees can work with their supervisors to request either Friday or Saturday off as their holiday. If a holiday falls on a Sunday, full-time employees can work with their supervisors to request either Sunday or Monday off as their holiday.

Non-Exempt (Hourly) Employees

Full-time hourly employees will receive eight (8) hours of holiday pay in their paycheck for the pay week that includes the holiday whether they take Friday/Saturday or Sunday/Monday as their holiday day or are unable to take either day off.

Part-time employees will only receive holiday pay if they work on the actual Saturday or Sunday holiday. Part-time employees will receive pay for the hours worked on the holiday day as well as holiday pay for the hours worked on the holiday day (up to a maximum of eight (8) hours).

Exempt (Salary) Employees

If due to the needs of IMG clients and customers, all the salaried employees in the same department cannot take either Friday/Saturday or Sunday/Monday off as their holiday, salaried employees whose supervisors cannot schedule either of the Friday/Saturday or Sunday/Monday days off for them as their holiday will be able to schedule another day in the same month as the holiday that works with the employee's department's schedule and client and customer needs as their holiday day off. (However, the Independence Day holiday can be scheduled in either July or August and the New Year's Day holiday should be scheduled in the preceding December).

Floating Holidays

Full-time employees are eligible for four (4) "floating holidays" each year to honor special days or to accommodate personal use.



One floating holiday is earned at the end of each quarter (March 31, June 30, September 30 and December 31). Floating holidays do not carry over from year to year and must be taken in the calendar year in which they are earned. Full-time employees in their first calendar year of employment are eligible for floating holidays for the year depending upon their date of hire as described below:

Hired in January, February or March	Four (4) floating holidays
Hired in April, May or June	Three (3) floating holidays
Hired in July, August or September	Two (2) floating holidays
Hired in October, November or December	One (1) floating holiday

Employees may use the current year's floating holidays before they are earned; provided, however, that if the employee leaves IMG's employ having used more floating holidays than he or she has earned at the time of departure, the amount of payment for any unearned but used floating holidays will be deducted from the employee's final paycheck or refunded to IMG if the employee has left.

Employees will not receive pay for floating holidays in lieu of time off. In addition, employees will not be paid for any earned but unused floating holidays remaining at the end of the year or when employment with IMG ends.

Floating holidays can only be taken in full-day (eight (8) hours) increments and must be scheduled in advance with an immediate supervisor. Approval of floating holiday requests is subject to the needs of the business and supervisors are responsible for ensuring adequate staffing levels. Floating holidays must be used completely by December 31.

(Applicable Only to Academic-Year Employees of the IMG Academy School)

Holidays

- Spring Break
- Memorial Day
- Labor Day
- Thanksgiving Break
- Holiday Break

Paid Time Off

- Six (6) days per year.

Bereavement

IMG's Bereavement Policy applies only to full-time employees.

Immediate Family

IMG provides three paid bereavement days to an employee requiring leave for the death of an immediate family member. "Immediate family" is defined as the employee's spouse, children, stepchildren, parents, in-laws, brother, sister, grandparent or grandchild.



If extensive travel is required, additional days may be requested and approved through Human Resources in conjunction with the employee's immediate supervisor. PTO days will be applied in this circumstance.

Non-Immediate Family/Friends

For bereavement absences in non-immediate family/friend situations, employees can use PTO days to cover the work time missed. Such requests must be approved by the employee's supervisor and made on a reasonable basis.

Where necessary or appropriate, IMG may request documentation of circumstances when administering this policy.

Jury Duty

IMG's Jury Duty policy only applies to full-time employees.

When called for jury duty, the employee's supervisor and Human Resources must immediately be provided with a copy of the court's notice to serve. Unlimited time is allowed for actual jury service and the employee will receive regular straight-time pay minus the pay received from the court.

If an employee serves less than a full day, the employee is expected to return to work.

Military Leave

Any employee who is called to active military duty in a branch of the U.S. Armed Forces will be granted an unpaid military leave according to federal guidelines. Any employee who is a member of the State National Guard or any reserve component of the Armed Forces of the U.S. is allowed a two (2)-week leave of absence per year for training or active duty. A copy of the official order from the appropriate military authority must be filed with Human Resources and notice be given to a supervisor or manager in advance. An employee is eligible for reinstatement after military duty or training, upon completion of duty or training according to applicable federal and state laws.

Upon return to work, the employee will be paid the difference between regular base wages and the military pay received. An official copy of payment must be submitted to payroll. If an employee signs up for additional training, it must be on a pre-approval condition and done without make-up pay. During a national crisis, each case will be reviewed on an as needed-basis.



Section V: Hiring, Appraisals and Exiting Procedures

Pre-Employment Background Investigation

A pre-employment background investigation and drug test is conducted on all employees hired by IMG. Typically, a start date would not be confirmed with a prospective employee until the successful completion of their pre-employment background investigation and drug test. In special cases, a new employee may be allowed to start working prior to the completion of the investigation and drug test. IMG reserves the right to rescind the offer of employment or immediately terminate the employee if it cannot verify all information provided, discovers unsatisfactory information about the employee or receives an unsatisfactory result on the drug test.

Orientation

IMG provides a new hire orientation program usually within the first few days of employment to assist new employees in adjusting to their new organization. This program affords new employees the opportunity to ask any questions regarding IMG, their position and their new responsibilities. It is expected that all employees will attend the new hire orientation program when scheduled.

During the new hire orientation, an employee is exposed to many facets of IMG, its clients, affiliates, divisions, services and philosophy. In this process some key policies, procedures and programs will be explained. The employee will complete necessary forms to add the employee to payroll and present to IMG information about their identity and eligibility to work in the United States according to federal law.

Job Postings

At IMG, we want to hire, promote and retain the best employees. Job openings are posted on our website. If you are interested in a particular position, please do as follows:

- The employee must meet the listed job qualifications and receive their supervisor's permission to apply for the position. This should be discussed with the supervisor prior to submitting the application.
- If the employee meets the job qualifications HR will reach out to the supervisor to ensure that the supervisor was notified and supports the employee.
- If the employee is selected to interview for the position they will be contacted by the hiring manager or HR.

Performance Appraisals

All managers and supervisors should regularly review the performance of each employee they supervise. This review process should be seen as essential to aligning the activity of employees with the department's and IMG's key business objectives. As communication is key, managers should engage in a two-way discussion with each employee on their past performance and future goals.



Resignation

Employees who desire to terminate their employment relationship with IMG are requested to submit notice of resignation in writing to their supervisor and Human Resources at least ten (10) working days in advance of the last day to be worked, but a thirty (30)-day notice period is preferred.

Exit Interview

Normally, an exit interview will be scheduled by Human Resources after the supervisor receives the written notice of resignation. The purpose of this interview is to discuss job-related experiences and review benefits eligibility.

Last Paycheck

Computers and all equipment, keys, credit cards and IMG company property must be returned to the employee's supervisor or Human Resources on or before the employee's last day of work. A final paycheck, if owed to the employee, will be distributed on the next regular payday following termination of employment.

Reference Requests

IMG does not provide references even when an employee puts the requests in writing, provides a release, etc. We only verify employee's names, hire and termination date (if applicable). Refer all calls requesting information on current or former employees to the HR Office.

Benefits

Upon termination of their employment, employees who participated in IMG's health benefits plan will receive a letter through the IMG Employee Benefits office concerning their medical coverage continuation rights under COBRA. Employees who were eligible and participated in IMG's 401(k) program, will receive a separate letter from Vanguard regarding the disposition of their 401(k) fund in accordance with the terms of those plans.



Section VI: Health, Safety and Security

IMG is committed to providing a safe and healthy workplace for all of its employees. IMG complies with all applicable requirements issued by the federal Occupational Safety and Health Administration and the State of Florida. The responsibility for the success of this safety policy is shared by IMG and its employees.

Our goal is to reduce or eliminate disabling injuries and illnesses. It is IMG's policy to exercise all precautions reasonably necessary to protect employees from all accidents.

An employee who witnesses an accident or an unsafe working situation should report it promptly to his or her supervisor or the Property Manager on Duty. Employees should also take note of the locations of fire extinguishers, first-aid kits, and emergency exits for their area of service.

Employees' responsibilities for maintaining and promoting a safe environment are as follows:

- Exercising care and good judgment at all times to prevent accidents and injuries to persons and property;
- Reporting to the employee's supervisor and seeking first aid for all injuries (bodily or otherwise), no matter how minor, to the employee, another employee, a client or any visitor or person on-site;
- Reporting accidents and incidents, no matter how minor;
- Reporting unsafe conditions, equipment or practices to the employee's supervisor (which includes any damage, impediment or tampering of equipment or property); and
- Observing safety rules and regulations at all times.

IMG's commitment to Health and Safety is to establish policies and procedures to ensure that we meet or exceed Health and Safety standards in all of our activities.

Campus Emergency Phone Number

IMG has instituted a campus emergency phone number: **(941) 650-1000**

You will see signage reflecting this number around campus. This was established so that our students and guests would know how to reach help in the event of an emergency, since many of our students may not be familiar with 9-1-1. What happens when this number is called? It rings to a cell phone that is carried by one of the property managers. When they receive the call they will find out the location of the individual, activate EMS/law enforcement as necessary and notify Health Services of a medical emergency. In the event that the Manager on Duty (MOD) does not answer the emergency phone, the phone will automatically forward to the front Campus Safety Security Gate, which is manned 24 hours a day 7, days a week. At that time the officer at the gate will assist in making proper notifications and attempt to contact the MOD.

It is important to understand that if you have an emergency that requires the assistance and response by Police, Fire and/or Emergency Medical Service (EMS), call 911 first to get the proper emergency service agency responding to the Campus. Then you or someone else can call the MOD.



When you call 911, be ready to give the following information to the dispatcher:

- The nature of the emergency
- Your name
- Your phone number
- The address and name of where the emergency is located
- If you are assisting in any way with medical, evacuation, etc.

Stay on the line with the dispatcher until help arrives or the dispatcher says it is OK to hang up.

IMG Addresses

East Campus
5500 34th St. West
Bradenton, FL 34210

West Campus
5691 Bollettieri Blvd.
Bradenton, FL 34210

Wellness Spa
5434 34th St. West
Bradenton, FL 34210

IMG School and ULC
5600 34th St. West
Bradenton, FL 34210

IMG Elementary School
4400 El Conquistador Dr.
Bradenton, FL 34210

Clubhouse
3502 54th Drive West
Bradenton, FL 34210

Ascender Hall
5691 Bollettieri Blvd.
Bradenton, FL 34210

IMG Country Club
4400 El Conquistador Dr
Bradenton, FL 34210

Severe Weather

IMG has implemented the Thor Guard Lightning Detection System. This system is maintained by the HCL Information Technology Department and Maintenance Department of IMG. The lightning detectors are located in the following areas:

- Main Campus Executive Building
- Baseball Offices
- Soccer Offices
- The Golf Club at El Conquistador
- The Half Way point on the Golf Club 18 hole Course

The system will be shut down nightly at 10 pm until 6 am each morning. This detection system will serve as an audible warning to staff, students and guests that lightning is within about twelve miles of the campus or that conditions are favorable for lightning to develop. The warning will consist of a continuous 30 second tone and a yellow strobe light will blink at each detector to indicate that the system has been activated. During the weather safety alert, an announcement made by the MOD will be broadcasted on all radio channels that the campus is on weather safety alert and all persons should seek shelter in a safe building. The same announcement will be broadcast by the MOD through the Emergency Call boxes located throughout the campus. In addition, all company cell phones will receive an automated email stating that the campus is on weather safety alert.



These emergency announcements will also be made in the event of a Tornado Warning where quick action may be required by staff, students, and guests.

When the warning tone sounds, students and guests that are already in a safe, normally occupied structure will be required to remain in that structure. Examples of these areas are: Junior Dining, dormitories, the Wooden Center, Adult Clubhouse, and Health Services. Students and guests should be reminded not to use landline phones or take showers during the storm. Cell phones are a safer alternative to be used in an emergency. Any staff taking calls or questions from parents should remind them that no student will be released for pick-up during the lightning lockdown. When the lightning lockdown occurs, it is the responsibility of all IMG employees to help ensure the safety of the students and guests. Supervision of students during the duration of the lockdown should be top priority.

When the horn is activated, the MOD and Transportation Supervisor will be responsible for making the decision to send any available buses or vans to outdoor locations such as the baseball and soccer fields to pick up the students. Trams should bring the students to the closest safe building and the Tram Operator should direct the students inside the building. Based on the individual storm, the buses may stay at the remote location or be sent back to campus. If sent back to campus, students may be held on the bus for the remainder of the "lockdown".

In the absence of a sturdy building, a vehicle with a hard metal roof (not a convertible or golf cart) may also be used as shelter. Since metal helps dissipate the lightning strike, staff and students should be instructed never to touch the sides of the vehicle.

In the event of a weather safety alert lockdown, the following areas are designated as a safe area shelter for students, guests and staff:

- **Ascender Hall**
 - Central Meeting area: Students should gather in the lounge areas
- **Soccer Trailers**
- **AP Range Golf Building**
- **El Con Pro Shop**
- **AP Baseball Trailers**
- **Basketball Gyms North and South**
- **Lacrosse Trailer**
- **Indoor tennis dome**
 - Students should remain in the dome. Any off-campus students and parents in close proximity should also be encouraged to seek shelter in the dome.
- **Weight Room**

When it is safe to go outdoors and/or resume activities, the lightning detection system will make a series of three 5 second audible tones indicating to staff member's that it is safe to release students and guests. An announcement by the MOD on all radio channels will be made stating that the weather safety alert lockdown has been lifted and everyone can go back to their normal activities. This same all clear announcement will be made by the MOD broadcast over the Emergency Call Boxes and also be sent to all company cell phones as an email.



Hurricane

If a hurricane is predicted to impact the campus the emergency staff committee will meet and designate what actions will be taken and by what departments. The Director of Operations will disseminate information on a regular basis regarding the actions being taken to protect students and staff as well as developments in weather condition.

Depending on the severity of the storm the Campus has building equipped to withstand up to and including a level 3 hurricane. This means that we have the ability to shelter in place at these locations.

Please refer to the IMG *Weather Emergency Planning Guide* for additional information.

Fire Safety Policy and Procedures

Prohibited Items

In an effort to keep our students, staff and guests safe, the following items are prohibited in our dormitories and around campus:

- Cigarettes, cigars, and smoking pipes of any sort
- Candles, lighters, and incense
- Halogen lamps
- Space Heaters
- Toasters and Toaster Ovens
- Hot Plates
- Electric Blankets
- Lava lamps

Campus Life staff may confiscate these items if found in dorms or other student life areas. Supervisors may ask staff members to remove these items if found in office or common areas.

Alarms and Notification

There are many fire alarm pull stations located throughout the campus near marked exits as well as near some unmarked exits. When the fire alarm is activated, our fire safety monitoring company is notified and will call the fire and rescue departments. Employees should call or send someone to call our campus emergency number (941) 650-1000 when an alarm is activated. This will alert the MOD to send help and to have any necessary gates, etc. opened. If a smoke alarm sounds (as not all of them are directly linked to the fire department), an alarm should still be activated.

The MOD should respond to the alarm activation area with the proper keys to access all areas of the building.

Some of our buildings are equipped with a Knox Box. This box is on the outside of the building and can only be opened by a fire department official. We do not have keys for the Knox Box. This Knox Box has the master keys for that particular building and all doors inside so the fire department can access all parts of the building day or night.



When the fire alarm is activated the building should be evacuated as quickly and safely as possible. All students and staff should be accounted for and if someone is missing the first arriving fire official should be notified immediately.

Students and staff should gather away from the roadway and away from the fire hydrants to allow for easy access to the building and the surrounding area.

NEVER IGNORE A FIRE ALARM!

Fire Drills will be conducted for IMG Academy Prep School students as often as practical, but at a minimum of one time per month. They may be conducted at various locations on campus and at different times of day or evening. During the summer, campers should be made aware of fire safety guidelines during orientation, as it would not be feasible to conduct a weekly fire drill...

Fire Safety Education

Fire Safety Education may be offered to both students and employees during the year. This may be done in-house or in conjunction with the Cedar Hammock Fire Rescue.

Employees will be expected to do an annual review of the Fire Safety Policies and Procedures. Employees will be instructed in the use of a fire extinguisher and evacuation procedures.

Campus Life staff will be responsible for reinforcing evacuation procedures and enforcing the prohibited item guidelines with students.

Fire drills will be conducted on a regular basis to ensure that everyone is familiar with their roles and responsibilities if an emergency evacuation becomes necessary.

OSHA Guidelines and Training

IMG prides itself in remaining current with all Occupational Safety Health Administration (OSHA) laws, guidelines and training.

OSHA is the state and federal governing body that oversees the working conditions at any employment facility. OSHA can come onto an employer's site without notice and conduct health and safety inspections. OSHA will also conduct inspections and investigations when a significant accident occurs involving a death or serious injury or when a company has a large amount of Workers Compensation Claims.

In the event that an OSHA inspector should arrive on the IMG Campus for an inspection, the MOD shall be notified and he or she will contact the proper management to escort the inspector around the campus.

IMG provides OSHA safety training several times a year in the following fields (check with your supervisor to see if you are required to participate in any of these training programs):

- Bio-Hazard waste disposal
- Blood borne Pathogens and Communicable diseases
- Confined Space Entry and Heat Stress
- Fall Protection
- Fork lift operator
- HIPPA Health Information Privacy Protection Act



- Lockout Tag-out
- MSDS-Hazardous Communications
- Spill containment

Safety Training that is not required by OSHA but is provided to employees who may have a specific job function include but may not be limited to:

- CPR, AED, and First Aid
- Drivers Training
- Fire Extinguisher Training
- Lifting and moving back safety
- Slips, Trips, and Falls
- Safe Handling of Food
- Blood Bourne Pathogens

If you are going to be driving an IMG vehicle, you are required to participate in a driving course that is conducted on a regular basis off campus. Please contact the HR department to schedule this training.

Hazard Communications/MSDS

Material Safety Data Sheets (MSDS) provide specific information regarding all chemicals and products that may cause some type of hazard to life, limb or property. This data retention is required by OSHA and is kept in key locations throughout the property. This information will be used by fire and rescue professionals so that they know how to handle an emergency involving these chemicals. These emergencies include fire, ingestion and exposure to the chemicals.

MSDS binders are located in the following areas: Accommodations, the Maintenance Building on Main Campus, Grounds Building at the Country Club and at the main school upstairs lab area. As an employee, you have the right to view these MSDS sheets. Contact your supervisor to setup a time when they can be reviewed.

Bloodborne Pathogens

IMG Academy adheres to the practice of "Universal Precautions" as outlined by O.S.H.A. (Occupational Safety and Health Administration). This is necessary to ensure that all necessary procedures are taken to minimize health risks to students, staff, and guests.

UNIVERSAL PRECAUTION PROCEDURES:

Gloves provide the most common form of a protective barrier from contamination.

- Gloves should be worn whenever the possibility of exposure to blood or other fluids exists.
- Gloves must be used when touching blood, body fluids, mucous membranes, or non-contact skin of all patients. This also includes handling items or surfaces soiled with blood or other body fluids.
- Gloves **MUST** be changed after contact with each procedure and disposed of in the appropriate Biohazard container. This also applies in the event of a defective, ripped, or torn glove.



- Any cut, laceration, abrasion, or cracked/damaged skin on the athletic trainer should be covered with the appropriate bandage prior to treating patients.

CPR, AED and First Aid Training

IMG provides CPR, AED, and First Aid Training several times a year. Employees that will have direct contact with students are required to participate and pass a recognized CPR class every two years. IMG uses the American Heart Association and Red Cross Guidelines for training and compliance with the Florida High School Association.

IMG staff that may be traveling with students may be required to participate and pass a basic First Aid class that can aid a student in the event of a medical emergency until trained medical professionals arrive.

IMG currently has sixteen Automatic External Defibrillators (AED's) placed in strategic locations for the rapid deployment in the event of a person in cardiac arrest. These AED's can be used without formal training while following the voice prompts to apply and activate the device. The AED's are located in the following locations:

Executive Board Room	Workout Room	Adult Clubhouse
Academy Park Golf Building		Academy Park Campus Life Office
Baseball Fields 1 and 2		Baseball fields 4 and 5
Basketball Gym South		Basketball Gym North
Champions Walk Campus Life Office	Country	Club Bar
Country Club Pro Shop		Football Fields
Health Services		Weight Room
Lacrosse Fields		Athletic Trainers

Golf Cart and Tram Safety

IMG has approximately 45 electric and gas power golf carts and eight trams that all must travel on shared walkways and roadways. Drivers of the golf carts must pay close attention at all times to their surroundings and obey all traffic signs and signals. Golf cart drivers should avoid distractions as much as possible limiting cell phone and radio distractions. No IMG employees should be allowed to ride in the back of Golf Cart, Golf Cart Beds or on trailers.

Golf cart drivers should never operate the golf cart in a reckless or unsafe manner. At no time, should anyone pass a tram unless cleared and waived on by the tram driver. As the driver of a golf cart or tram, the driver is responsible for the safe operation of the vehicle. If you are uncomfortable driving a golf cart, speak with your supervisor so that he or she can have you trained to become familiar with the vehicle.

If you have an accident with your golf cart or tram, report the accident as soon as possible to your supervisor. If you or someone else is injured contact your supervisor or the MOD right away so that the injured person can be checked and treated if needed. As the driver, if you are involved in an accident you will be sent to one of our participating medical facilities to have a breathalyzer and drug test.



Parking

If you drive to work:

- Park in the area of the lot designated employee parking, these areas include:
 - East Campus designated employee parking spots
 - West Campus APV parking lot
 - West Campus Stadium parking lot
 - Champions Walk (CW) parking will be available without a key card during the following times;
 - Mon-Fri 7AM to 7PM
 - Saturday 10AM to 5PM
- Always lock your car
- Use the “buddy system” or walk in pairs if you park off campus and leave at night. It will make leaving safer.
- Post your employee decal or hang tag in the designated location
- We are not responsible if your car is damaged while in the parking lot

Workers' Compensation

To provide for payment of medical expenses and for partial salary continuation in the event of a work-related injury or illness, an employee is covered by Workers' compensation insurance. The amount of benefits payable and the duration of payment depend on the nature of the injury or illness.

If an employee has an accident or becomes ill on the job, they must personally and immediately report the accident or illness to a supervisor or Human Resources. This will help ensure that IMG can assist the employee in obtaining the proper medical treatment. If this process is not followed, the employee may jeopardize a claim for any benefits.

If You Are Injured At Work:

1. If it is an emergency, have someone activate Emergency Medical Services 911.
2. Call or have someone call your supervisor and let them know.
3. If it is a non-emergency, you may go to Health Services or the Athletic Trainers for an evaluation. They may provide basic first aid and make recommendations for further care. They will also complete an Employee Accident Report.
4. Take the Employee Accident Report to Human Resources. If it is after hours please make sure they receive it by the next morning and proceed to Step 5.
5. If the Health Services or Athletic Training Staff has recommended that you see a physician, or you feel that you need further treatment, you will be sent to one of the participating Workers' Compensation Providers (listed below).
6. If you are working away from IMG (e.g., as a coach traveling with a team), please seek medical care at the nearest Emergency Center. Notify Human Resources and your supervisor as quickly as possible.
7. Return any necessary paperwork back to Human Resources.



IMG Workers' Compensation Providers

US Health Works
1105 53rd Ave. E
Bradenton, FL 34203
(941) 755-2562

**If it is an emergency or after business hours, you may go to a local Hospital Emergency Room. The 2 located closest to IMG are:

Blake Medical Center
2020 59th St. West
Bradenton, FL 34209
Trauma Center

Manatee Memorial Hospital
206 2nd St. East
Bradenton, FL 34208

****You should report your incident to your employer as soon as possible. Any claim reported after thirty (30) days may be denied****

Security

The Campus Safety department monitors the main entry/exit points to the campus as well as having Officers patrolling the campus. However, the true security force for IMG Academy are the employees. Our employees are in every part of the campus and are essentially the eyes and ears for Campus Safety. We ask that all employees participate and report any unknown, suspicious or unusual persons or incidents to Campus Safety.

Keep in mind that persons with bad intentions do not always have to come from outside the campus. Employees, students, parents and visitors of all ages and gender could also have bad intentions. It is likely that a person with bad intentions does not look like a "bad" person so instead of observing their physical appearance, pay attention to their behavior.

Examples of suspicious behavior include:

- Nervous
- Aware of their surroundings (looking around)
- Avoids eye contact or verbal communications
- Walks or stands around the campus aimlessly
- Visually interested in a group of athletes instead of just a few
- Enters and remains in restrooms for long periods of time
- Pretending to read a book or use a cell phone
- Attempts to talk to athletes for no reason
- Attempts to enter dorm rooms or offices
- Sitting in a vehicle in the parking lot or offering to give athletes rides
- Being in athlete areas without any apparent reason
- Persons asking about athlete's routines or celebrities on campus

Keys/Keycards

If issued hard keys or an access card:

- Do not loan your keys/card to anyone



- Do not open doors for anyone else
- If you lose the keys/card, report it to Campus Safety immediately

Emergency Call Boxes

Emergency call boxes have been installed in various parts of the campus and serve as an emergency communication tool. Any person who feels distressed, fearful or who witnesses an emergency can activate the call box by pressing the red button on its front panel (the person will be put in direct communication with Campus Safety). Inappropriate use of this safety device is not acceptable.

Weapons

Weapons are not allowed on IMG Campus (including inside personal vehicles).

Weapons include but not limited to;

- Firearms
- Stun Guns/Tasers
- Any device that shoots a projectile or is designed to penetrate
- Clubs or miniature bats
- Explosives (including fireworks)
- Knives with blades longer than 3 inches
- Toy guns (unless they are completely orange or yellow in color)

Devices that are allowed include;

- Mace/ pepper spray (must be kept inside vehicles or carrying bags)
- Culinary knives (must be work orientated)
- Fishing knives (must be kept in vehicles or fishing tackle boxes)

Active Shooter

If you hear gunshots or are advised of an active shooter

- **Run** away from the sounds of the gunshots or direction of the suspect (direct others to follow you)
- Seek shelter at least 200 yards away behind concrete or steel
- Call 911 and advise them what you saw or heard
- Stay in place until advised by Campus Safety or Law Enforcement or if the active shooter approaches

If the gunshots or active shooter are too close for you to run

- **Hide** behind a locked door or behind a large object (get out of sight)
- Call 911 if possible and advise them of your location (do not call if the active shooter is close enough to hear your conversation)
- Stay in place until advised by Campus Safety or Law Enforcement or if the active shooter approaches



If the active shooter enters a room you are in or you come face to face with the shooter and cannot run or hide

- **Fight** the shooter as soon as they come into view
- If possible, use a heavy- metal object to strike the person in the head
- Use violence as you are attempting to either disarm or severely wound the shooter
- Do not attempt to talk or reason with the shooter as this rarely stops the shooter

Campus Lockdown

When an emergency situation occurs on or near the IMG campus, it may be determined by Campus Safety or the MOD to lock down all or part of the campus. The purpose of a lockdown is to keep harmful activity away from campus occupants.

Lockdowns will be communicated via hand held radios, campus PA systems and email alerts. When alerted to a lockdown, please follow all instructions.

Complete Lockdown –

- A complete lockdown should be ordered when there is a known or potential threat on or near campus but the location of the threat is unknown.
- All persons should stay inside buildings, no outside movement

Perimeter Lockdown-

- A perimeter lockdown should be ordered when there is a known or potential threat outside the campus
- Campus Safety will increase the level of security at the gates and all persons (not just the driver) will need to be approved before entry is allowed

Exit Lockdown-

- An exit lockdown should be ordered if a student is reported missing or abducted
- All vehicles are stopped at the exit gates and searched

Half Campus Lockdown-

- Half campus lockdowns should be ordered when a known or potential threat exists on either the East or West Campus and it is decided to lockdown only one side. The wooden AP Bridge will be the transition between the two campuses.
- Campus Safety will prevent all access into one side of the campus

Partial Lockdowns-

- Partial lockdowns should be ordered when a known or potential threat exists in or around an isolated area such as a building or area
- Campus Safety will prevent access to a specific part of the campus

After Hours Vehicle Search

All vehicles departing the campus during the evening and overnight hours are subject to search from Campus Safety. The purpose of the search is to verify that students are not departing the property without authorization or consent.



Bomb Threats

Any threat by phone, letter, internet or in person of any explosive device or mass injuries. If an employee or student receives a bomb threat;

- Attempt to keep the person talking by asking questions or telling them you don't understand
- Write down or remember all details (especially background noises)
- Contact Campus Safety immediately

Visitors

Employees expecting visitors to the campus should notify Campus Safety at least 24 hours in advance to assist in an efficient check-in process at the main entrances

Pets

Pets are not allowed on campus unless prior approval is given from Human Resources.





EMPLOYEE HANDBOOK ACKNOWLEDGMENT,
RECEIPT AND CONSENT

Please read carefully, initial each paragraph and sign on the next page.

I acknowledge that I have received a copy of IMG Academy's Employee Handbook. I understand that the Handbook summarizes IMG Academy's personnel policies and practices. I also acknowledge that I have had an opportunity to and have read the Handbook, have been able to ask any questions I have about the Handbook and its contents, and understand the Handbook. I agree to comply with the policies and procedures contained in the Handbook.

_____{{Int_es_:signer1:initials}}_____ (Initials)

I specifically affirm that I understand and will comply with IMG Academy's Anti-Harassment and Discrimination policy.

_____{{Int_es_:signer1:initials}}_____ (Initials)

I understand that my employment with IMG Academy is at will, and that my employment can be terminated by me or by IMG Academy, at any time, with or without cause, and with or without notice. I further understand that no manager, employee, supervisor, agent, partner or representative of IMG Academy has any authority to enter into any agreement for employment for any specified period of time, or to make any agreement which alters IMG Academy's at-will policy. The at-will nature of my employment can only be altered by a written agreement signed by me and an authorized signatory on behalf of IMG Academy.

_____{{Int_es_:signer1:initials}}_____ (Initials)

I further understand that the statements contained in the Handbook are not intended to and do not create any contractual or other legal obligations, and do not alter the at-will status of my employment with IMG Academy. Except as to the at-will nature of my employment, I also understand that IMG Academy may modify or rescind any policies, benefits, or practices described in the Handbook at any time and without prior notice to me. I accept responsibility for keeping informed of policy changes and maintaining my Handbook current for my use and reference.

_____{{Int_es_:signer1:initials}}_____ (Initials)

PLEASE READ CAREFULLY, INITIAL EACH PARAGRAPH AND SIGN ON THE NEXT PAGE.



**EMPLOYEE HANDBOOK ACKNOWLEDGMENT,
RECEIPT AND CONSENT**

After having read this Handbook, I expressly consent to the inspection, searches and monitoring provisions of the Handbook's "Inspections and Searches on Company Property Policy", "Use of Technology Policy", and agree to be bound by the "Conflict of Interest, Confidentiality and Code of Ethics Policy" of this Handbook. I hereby waive any rights of privacy I might otherwise have.

_____{{Int_es_:signer1:initials}}_____ (Initials)

Lastly, I understand that this Handbook supersedes and replaces all previous personnel policies, practices, guidelines, and prior statements or promises by IMG Academy or its managers and supervisors that may conflict with the provisions of this Handbook.

_____{{Int_es_:signer1:initials}}_____ (Initials)

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

Dated: _____{{Dte_es_:signer:date}}

Employee Signature: _____{{Sig_es_:signer1:signature}}

Employee Printed Name: _____{{Name1_es_:fullname}}
