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NRA EMPLOYEE HANDBOOK

This Employee Handbook is meant to serve as a guideline and is not intended to be a contract, expressed or implied, between the NRA and the employee, and does not create any entitlement to any policy, procedure, or benefit. NRA reserves the right to modify, delete or add to any of the policies set forth herein without notice and reserves the right to terminate an employee at any time with or without cause.

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SECTION A

ACKNOWLEDGEMENTS

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INDEX NO. 451625/2020 COUNTY CLERK 03/06/2023 10:02 NEW YORK NYSCEF DOC. NO. 1304 RECEIVED NYSCEF: 03/06/2023 NRA SUBJECT: STATEMENT OF RECEIPT EFFECTIVE: 01/01/04 PAGE NO.: A-1.01 To ensure employees understand that employment at the National Rifle Association of America is by mutual consent and that the NRA Employee Handbook describes guidelines which the NRA generally follows, employees are required to read and sign a Statement of Receipt when they receive the Employee Handbook. The signed Statement of Receipt will be kept on file in the Human Resources Division. The text of the Statement of Receipt follows. , understand that this Handbook describes certain benefits, policies, and procedures pertaining to NRA operations. They are not intended to confer contractual rights of any kind upon any employee, or to create contractual obligations of any kind for the NRA. The NRA may supplement, revise, create, or discontinue, at any time at the NRA's sole discretion, with or without notice, any policies, procedures, practices or benefits as the NRA deems necessary or appropriate. The NRA reserves the right to require, modify and/or increase contributions towards benefits plans. Further, I understand that this Handbook is not a contract of employment between myself and the NRA. The offer or acceptance of employment is not to be construed as a contract of employment or as a promise by either me or the NRA of continued employment. Employment at the NRA is by mutual consent. The NRA or I may terminate the relationship at any time. Employment does not create any entitlement to any policy, procedure, or benefit, nor does the Handbook create a duty on the part of the NRA to comply with any policy, practice, procedure, or benefit. In the event of termination of my employment, I agree to repay any monies owed to the NRA and to return all NRA equipment, credit cards, keys, identification cards, cash advances and any other NRA property. I hereby authorize the NRA to deduct any and all monies owed the NRA for whatever reason from my final paycheck, including accrued leave payout. Only the Executive Vice President has the authority to enter into any agreement guaranteeing employment for any specified period of time. Any such agreement, if made, shall not be enforceable unless it is in writing and signed by the Executive Vice President. With the exception of job offers extended by the Executive Vice President, the Human Resources Division is the only NRA Division authorized to extend job offers. Acceptance: **Print Name** Signature Date

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SURFAT: CONFIDENTIALITY AGREEMENT EFFECTIVE: 01/01/04 PAGE NO.: A-1.02

All full-time, part-time, and temporary employees are required to read and sign an NRA Confidentiality Agreement. If an individual elects not to sign the Agreement, employment with the NRA will be terminated. The text of the NRA Confidentiality Agreement follows.

This AGREEMENT is entered into on the day and date listed above the signatures of the parties hereto set forth.

In consideration of employment of the EMPLOYEE, whose name and signature appears herein below, by the NATIONAL RIFLE ASSOCIATION OF AMERICA, a NEW YORK not-for-profit corporation, (hereinafter "NRA"), it is agreed and acknowledged by the EMPLOYEE AS FOLLOWS:

That all matters of information whatsoever, including, but not limited to, membership lists, information and background and other vital statistics concerning members, information with respect to NRA salary and wages, policy, strategy and/or other methodology and procedures, including fund raising, and NRA access data and access codes that are received, processed, stored, transmitted and/or otherwise generated by or acquired by the NRA and handled through any system and information source of every kind utilized or made available to the NRA in any and all of its Offices, Divisions, Branches, NRA Foundation, Whittington Center, State Associations and affiliates, and each and every office thereunder, including, but not limited to, Executive Offices, Office of the Secretary, Office of the General Counsel, Administrative Services, Competitions, Development, Field Operations, Financial Services, General Operations, Human Resources, Law Enforcement Activities, Membership, NRA Institute For Legislative Action, NRA Publications, Purchasing, Education and Training, and Community Service Programs.

Which data, intelligence and information includes, but is not limited to: NRA Current Membership Data, consisting, among other things, of names, addresses, and other member profiles and relevant information; NRA Prospect Data, consisting of names, addresses, and other prospective member profiles and relevant information; NRA Expired Membership Data, consisting of names, addresses, and other profiles and relevant information; NRA Proprietary Software, including but not limited to Programs and Documentation, NRA Data and Program Security, including but not limited to, Passwords, Log On Identifications, Access Methods, Documentation, NRA System Documentation, and any and all data and information that exists at the NRA on magnetic tapes, disks, hard drives, data banks, printed reports, and electronic data transmissions systems;

All of which foregoing information, intelligence and data are referred to as "NRA Information," and consist of secret, valuable, special, and unique assets of the NRA's business.

Accordingly, the Employee hereby further agrees in consideration of employment by and with the NRA, that he/she shall not, during and forever after the term of his or her employment with the NRA, disclose all or any part of the "NRA Information" to any person or persons, firm, corporation, partnership, joint venture, and/or association, or other entity, legal or illegal, for any reason or purpose whatsoever without the express authorization and consent of the NRA.

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NRA CONFIDENTIALITY AGREEMENT

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It is further agreed by the EMPLOYEE in consideration of employment by and with the NRA, that in the event of the EMPLOYEE's breach of the CONFIDENTIALITY AGREEMENT, the NRA shall be entitled to a preliminary restraining order and an injunction restraining and enjoining the EMPLOYEE from disclosing all or any part of "NRA Information" of any and every sort obtained by the EMPLOYEE through his or her association with the NRA and from rendering any services to any person, firm, corporation, partnership, joint venture and/or association, or other entity, legal or illegal, to whom all or part of such "NRA Information" has been or is threatened to be disclosed.

In the event of the aforesaid breach by the EMPLOYEE, in addition to injunctive relief, which is not an exclusive remedy, and the election of which does not preclude other remedies, the NRA may pursue any and all other remedies available to the NRA in law and equity for such breach or threatened breach, including the discharge of the EMPLOYEE from employment with the NRA and the recovery of damages from the EMPLOYEE.

By executing this Confidentiality Agreement, EMPLOYEE affirms that he/she has read and understands this entire document, fully accepts the conditions set forth herein, and further understands that this Agreement is legally binding.

IN WITNESS WHEREOF the EMPLOYEE enters into the foregoing CONFIDENTIALITY AGREEMENT and sets his or her hand, and the NRA accepts, thisday of, 20
Agreed to:
EMPLOYEE
Accepted:
By: FOR THE NATIONAL RIFLE ASSOCIATION OF AMERICA

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NRA

SUBJECT: STATEMENT OF CORPORATE EFFECTIVE: 01/01/04 ETHICS PAGE NO.: A-1.03: 1 of 4

I STATEMENT OF POLICY

It is the policy of the National Rifle Association of America to conduct the Association's business in an honest and forthright manner. To this end, NRA employees strive for excellence in their work and for a consistent standard of integrity in their business dealings.

Consistent with this objective is the Association's requirement that all employees comply with applicable bylaws and policies of the association, and all relevant laws and regulations in conducting the association's business. No violation of the spirit or intent of these bylaws, policies, laws and regulations will be tolerated.

To maintain consistent standards of integrity:

- Association employees shall not become involved in any activity which might influence, be reasonably expected to influence, or give the appearance of influencing their objective business judgment in dealing with others. Employees shall not become involved in conflict of interest situations.
- 2. No Association employees shall engage in illegal or unethical actions or obtain special favors or consideration from any person or organization.
- Association employees shall maintain complete and accurate books, records and documentation in accordance with the accounting rules and controls established by the Association.
- 4. Each officer, director, division director or activity supervisor, shall have responsibility: (a) to insure that these policies are communicated to the employees reporting to them; (b) to clarify and explain said policies when necessary; (c) to monitor compliance therewith, and (d) to report all known (or suspected) violations of said policies to the Executive Vice President of the Association, the Treasurer of the Association, and to other persons whom they designate.

Where a question arises whether a particular anticipated course of business conduct is ethical or legal, the individual contemplating the action or directed to perform the action shall seek advice from the Office of the General Counsel of the Association.

Failure to comply with this policy and any specific implementing policies may result in dismissal form employment or other disciplinary action. Violations of law will be reported to appropriate law enforcement officials.

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II Ethical Business Relationships

To ensure that the National Rifle Association of America maintains a reputation for ethical conduct in its business relationships, it is the individual responsibility of each officer or employee to avoid any activity or interest which might tend to discredit him or herself, or the Association. Specific prohibitions are as follows:

Each officer or employee will be free of any investment, association or connection which interferes, or may appear to interfere, with the independent exercise of his or her judgment on behalf of the Association. The fulfillment of this obligation shall include, but not be limited to, the following:

- 1. No officer or employee may own directly or indirectly, or act as agent or trustee for, any financial interest in any supplier of goods or services to the association, unless such financial interest is in stocks, bonds or other publicly traded securities or a corporation, and the interest comprises less than five percent (5%) of the assets of the corporation.
- 2. No officer or employee may hold a position of director, officer, employee or agent with any such supplier.
- 3. No officer or employee may accept personal favors or gratuities from any such supplier with the agreement or understanding, either express or implied, that such officer or employee shall use his or her position, influence or discretion in a manner designed to benefit or reward such supplier in any dealings with the Association.
- 4. No employee may accept personal favors or gratuities form any supplier with either a retail price or fair-market value in excess of \$100.00 unless, prior to accepting or receiving such personal favor or gratuity, the employee submits a written statement of justification which is approved by the Executive or Director of the employee's division. A copy of the approved justification will be filed with the Human Resources Division.
- 5. No officer or employee should use, for personal gain, any information which he or she acquires in course of his or her employment.
- 6. Any employee involved in any situation which may represent a possible conflict of interest is to immediately report same to the Executive Vice President.

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III Use of and Accounting for Association Funds and Assets

- The use of association funds or assets for any unlawful or improper purpose is strictly 1. prohibited.
- 2. No undisclosed or unrecorded fund or asset of the Association shall be established for any purpose.
- 3. The appropriate employees of the Association will make and keep books, records, and accounts, in reasonable detail, sufficient to reflect accurately and fairly all financial transactions and the disposition of funds and assets.
- 4. The appropriate employees of the Association will devise and maintain a system of internal controls sufficient to provide reasonable assurance that:
 - Transactions are executed in accordance with management's general or specific a. authorization;
 - b. Transactions are recorded: 1) to permit preparation of financial statements in conformity with generally accepted accounting principles or any other criteria applicable to such statements, and 2) to maintain accountability for funds and assets;
 - c. Access to assets is permitted only in accordance with management's general or specific authorization; and
 - d. The recorded accountability for funds and assets is compared with the existing funds and assets at reasonable intervals and appropriate action is taken with respect to any differences.
- 5. Periodic compliance reviews shall be the responsibility of the Treasurer of the Association, at the direction of the Audit Committee established by the Board of Directors and the Executive Vice President of the Association. Employees specifically designated by the Treasurer of the Association as having responsibilities involving purchase authorization, control or disbursements of funds, and/or other control of Association assets, will be required to sign an Annual Statement of Corporate Ethics that will be maintained in the individual personnel records in the Human Resources Division.

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IV Written Statement of Business with the Association

The Bylaws were amended in Phoenix to require any director, officer, or employee of the Association to disclose any business with the Association in excess of \$2,000 per year. This Bylaw (Article IV, Section 2) reads as follows:

"Any Director, officer, or employee of the Association who is also a member of the governing body of any business, corporate, or other entity (whether as trustee, director, sole-owner, partner, or the like) which does any business with the Association in excess of \$2,000 either within the year or pursuant to any contract or contracts originating within a year shall immediately file a written statement of all such business as to the nature and amount thereof, to the best of his or her knowledge, with the Secretary who shall transmit such statement to the Board of Directors at its next meeting and who shall include all such statements in the Secretary's report at the next Annual Meeting for Members."

General Counsel NRA – Office of General Counsel

NRA - Human Resources

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SECTION B

INTRODUCTION

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NRA

SUBJECT: PER	CRFORMANCE STANDARDS	EFFECTIVE:	02/01/11
		PAGE NO.:	B-1.02

This Employee Handbook is designed to acquaint you with the National Rifle Association of America and provide you with vital information about the policies and procedures affecting your employment. However, the handbook is not a contract nor does the handbook change NRA's employment at will policy. As an employee, you have strict responsibilities to NRA, its management, your fellow employees, and the NRA members you serve. You are expected to observe professional standards of conduct; perform assigned tasks efficiently and effectively; be punctual according to the established schedule for your office; observe all safety rules and regulations; demonstrate a considerate and constructive attitude toward your fellow employees; respect the rights and property of others; use Association time, funds, and property for NRA business and activities only; and perform assigned duties and responsibilities to the best of your ability and to the expectations of the Association as enunciated herein.

You have an obligation to read, understand, and comply with all provisions of the Handbook that are produced in accord with federal and state laws and intended to be fair, equitable, and conducive to both your professional and personal growth.

The NRA expects every employee to abide by its policies, objectives, priorities, and directives in conjunction with the performance of job responsibilities as communicated through this Handbook and verbally through your supervisor. Your supervisor is expected to communicate performance standards on an ongoing basis and to conduct an annual, written performance evaluation.

Employees are required to read and sign a Statement of Receipt for this Handbook and required to read and sign a Confidentiality Agreement and Code of Ethics Agreement.

The NRA reserves the right to revise, supplement, or rescind any policies or portion of the Handbook from time to time as it deems appropriate, in its sole and absolute discretion. As the Handbook is reviewed and updated periodically, you will be provided with new/revised pages; however it may not be possible to keep the Handbook completely current. You should ask your Manager or the Human Resources Division for current information as the need arises.

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SNEECT: | OVERVIEW AND OBJECTIVES **EFFECTIVE:** 02/01/11 PAGE NO.: B-1.03: 1 of 2

The New York National Guard Officers who founded the National Rifle Association of America in November 1871 hoped the new organization would improve the quality of marksmanship in the armed forces. Over a century later, the NRA has grown into an organization of nearly four million members, committed to uphold the right of law-abiding citizens to keep and bear arms and to reaffirm that right through safety, responsibility and

Governed by a Board of Directors elected by the voting membership, the NRA is dedicated to the following purposes and objectives:

To protect and defend the Constitution of the United States, especially with reference to the inalienable right of the individual American citizen guaranteed by such Constitution to acquire, possess, collect, exhibit, transport, carry, transfer ownership of, and enjoy the right to use arms, in order that the people may always be in a position to exercise their legitimate individual rights of self-preservation and defense of family, person, and property, as well as to serve effectively in the appropriate militia for the common defense of the Republic and the individual liberty of its citizens;

To promote public safety, law and order, and the national defense;

To train members of law enforcement agencies, the armed forces, the militia, and people of good repute in marksmanship and in the safe handling and efficient use of small arms;

To foster and promote the shooting sports, including the advancement of amateur competitions in marksmanship at the local, state, regional, national, and international levels;

To promote hunter safety, and to promote and defend hunting as a shooting sport and as a viable and necessary method of fostering the propagation, growth, conservation, and wise use of our renewable wildlife resources.

The NRA meets these objectives through a structure of divisions addressing firearm safety, firearms training, law enforcement programs, junior activities, women's issues, hunter services, recreational shooting, competitions, gun collecting, legislative and political action in defense of the Second Amendment. Each division grew from a specific need of our membership. It is the membership who supports the programs and services of these divisions through dues and donations.

The NRA Foundation is a non-profit corporation established by the Board of Directors and has been successful in supporting a broad range of NRA programs and activities.

From its headquarters in Fairfax, Virginia, the NRA publishes and distributes a wide variety of magazines, books, videos, and brochures covering, among other things, Second Amendment issues, hunting and hunting techniques, firearms and their use, training and gun safety. In fact, the NRA is the nation's leader in firearms training, working to improve safety and marksmanship, and encourage interest in the shooting sports.

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INDEX NO. 451625/2020 FILED: NEW YORK COUNTY CLERK 03/06/2023 10:02 PM NYSCEF DOC. NO. 1304 RECEIVED NYSCEF: 03/06/2023 B-1.03: 2 of 2 The NRA has grown into a vast and complex grassroots Association with activities on the national, state, and local levels. From its support of the National Firearms Museum, with its outstanding collection of firearms, related artifacts and reference materials, to its nationally recognized political and legislative efforts, the NRA's goals and objectives have never wavered from the ideals of its founders. And with your commitment to service, they never will.

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SECTION C

NRA POLICIES AND PROCEDURES

C1 – New Hire

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NRA

SUBJECT: EMPLOYEE SELECTION EFFECTIVE: 02/01/11 PAGE NO.: C-1.01

It is the policy of the NRA to be an equal opportunity employer and to hire individuals solely on the basis of their qualifications and ability to perform.

Internal Applicants

NRA employees will be considered for transfer or promotion on the basis of their qualifications, ability to perform the specified job and the impact of the action on their existing and new departments. All internal applicants will be screened initially by the Human Resources Division. An applicant's current position description, performance and evaluation will be reviewed to determine the appropriateness of the requested action. Applicants must notify their current supervisor when they are formally scheduled to be interviewed by a hiring manager for a new position.

External Applicants

External applicants may submit resumes in response to a specific job posting, or as an expression of general interest in obtaining employment with the NRA. External applicants may also be presented for consideration through the NRA Employee Referral program, or by completing an employment application. Information provided on the application form and/or resume is used by the NRA to select applicants to be interviewed via telephone by Human Resources. On the basis of their interview and the relevancy of their experience, applicants will be selected for interviews with the hiring manager. The Human Resources Division will conduct reference checks on any applicants-under serious consideration for employment for a particular position. Depending upon the responsibility of the position for which the applicant is applying, credit and full background checks may also be required. Applicants must complete an Authorization and Release Form prior to the Human Resources Division commencing the reference check process.

Job Offers

The Human Resources Division, in conjunction with the hiring manager, periodically audits salaries to ensure equity and fairness. With the exception of job offers extended by the Executive Vice President, only the Human Resources Division is authorized to extend job offers based upon final approval by the Executive Vice President. Employees are reminded that employment at the NRA is by mutual consent and may be terminated by either the employee or the NRA. NRA is an at-will employer.

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NRA

SUBJECT: REFERENCE AND BACKGROUND CHECKS EFFECTIVE: 02/01/11 PAGE NO.: C-1.02

It is the policy of the NRA to conduct reference checks on applicants who are under serious consideration for employment. Depending upon the duties and responsibilities of the job for which the applicant is applying, credit and full background checks including criminal and other public records checks may also be conducted. Applicants are required to complete an Authorization and Release form. An applicant will not be considered for employment if he/she does not give the NRA authorization to conduct reference checks. Providing inaccurate or incomplete information on an application, resume, or during the interview process will eliminate an applicant from consideration for employment or will be grounds for termination if already employed by the NRA.

All information obtained from any of the reference sources listed by job applicants is kept strictly confidential by the NRA. Access to such information is restricted to designated members of the Human Resources Division and supervisory or management officials of the NRA who have a clear work-related reason for obtaining such access.

No person will be considered for employment if information gathered during a public records or criminal background check have direct negative impact on the position for which the applicant has applied.

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SUBJECT: INTERVIEW AND RELOCATION EXPENSES EFFECTIVE: 02/01/11 PAGE NO.: C-1.03

The NRA generally recruits from the Washington, D.C. Metropolitan area for positions located in the area. From time to time, candidates may be recruited from outside the area. Reimbursement for travel and specified relocation expenses may occur with the prior approval of the Division Director, and will be charged to the respective division and/or department.

NRA authorized expenses may include transportation and out-of-pocket expenses for an interview, residence hunting, a temporary living allowance not to exceed 30 days, moving expenses not to exceed \$7,500, and other incidental expenses. Costs such as closing costs and broker's fees are not reimbursable expenses. Moving expense reimbursements are subject to IRS regulations and some relocation expenses qualify as taxable income. All taxable moving expense reimbursements will be added to the employee's gross wages and W-2 during the same year it was paid. Accordingly, relocation expense reports must be approved by Human Resources prior to processing.

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NRA

SUBJECT: IMMIGRATION REGULATIONS EFFECTIVE: 02/01/11 PAGE NO.: C-1.04

It is the policy of the NRA to comply with the Immigration Reform and Control Act of 1986 (IRCA). IRCA requires all employers in the United States to ensure all newly hired employees are entitled to work in the United States. It is unlawful for the NRA to hire or to continue to employ a person whom the government has not authorized to work. The NRA is a participant in the E-Verify program through the Department of Homeland Security (DHS) and Social Security Administration (SSA). The NRA will provide these agencies with information from each new employee's Form I-9 to confirm work authorization.

The NRA must keep a Form I-9 on file for each employee hired or re-hired after November 6, 1986. This form requires the employee to attest that he/she is authorized to work in the United States. The employee must also submit documentation to verify his/her identity and authorization to work in the United States within three business days of his/her start date. An employee who fails to turn in proper documentation within three business days of his/her start date will not be permitted to work until such documentation is received in Human Resources.

Forms of acceptable documentation are listed on the I-9 form.

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NRA

SUBJECT: ORIENTATION **EFFECTIVE: 02/01/11** PAGE NO.: C-1.05: 1 of 2

To promote excellence from the start, NRA employees must participate in an orientation program that begins on their first day of work.

General Objectives of Orientation Program. The NRA's orientation program is designed to help new employees feel welcome and inform them of what the organization offers and what performance and conduct is expected. By participating in the orientation process, new employees will receive all the basic information needed to perform effectively and efficiently in their new positions.

General Orientation Procedures. The NRA's general orientation program is divided into three parts:

- (1) Welcoming new employees. On the first day of work, new employees are welcomed by their supervisor and introduced to co-workers, human resource staff, and other appropriate supervisory and management representatives
- (2) Introduction to the organization. During the first few days on the job, new employees are provided with information on the organization's goals, expectations, history, values, products, services, customers, competitors, policies, procedures, benefits, and other programs. The Human Resources Division, working with the employee's supervisor, has primary responsibility for communicating this information to the new worker. Before the end of the orientation program, employees will read and sign the Confidentiality Agreement, Code of Ethics Agreement, receive and sign for the Employee Handbook, obtain their identification badge, complete tax withholding forms, etc.

For a smooth and productive transition to employment with the NRA, you are encouraged to communicate with your co-workers, your Manager, Director, and the Human Resources Division.

(3) Introduction to the position. Primary responsibility in this area belongs to the new employee's supervisor. Topics that supervisors cover when introducing new employees to their duties and responsibilities include general expectations for performance and conduct, specific job requirements, and performance review procedures.

Orientation Program Responsibilities. Orientation responsibilities generally belong to the Human Resource Division. The Human Resource Division's primary responsibility is to plan, coordinate, oversee, and evaluate orientation program activities designed to introduce the employee to the organization. In addition, the division serves as part of the official welcoming team, ensures that new hires complete all required forms, communicates benefits information, and acquaints employees with company-wide policies and procedures. Supervisors of new hires generally are responsible for initially greeting new workers; showing them around the organization; introducing co-workers; and explaining specific job or department duties, procedures, and responsibilities.

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NRA

SUBJECT:	INTRODUCTORY PERIOD	EFFECTIVE:	02/01/11
		PAGE NO.:	C-1.06

It is the policy of the NRA that all new employees are to be placed on an initial probationary period for 90 days. During this period, the employee's performance will be monitored and evaluated. Generally, an employee will receive performance feedback during the introductory period. This probationary period may be extended for up to an additional 90 days should an employee's performance be evaluated as not fully satisfactory. The NRA or the employee may decide to terminate employment without notice during this period, consistent with the NRA's employment-at-will policy.

An employee on probationary status accrues but cannot take sick leave or vacation (annual leave) with pay until after they have satisfactorily completed the 90-day probationary period. An exempt employee may earn compensatory time with the prior approval of the Division Director while on introductory status. The Division Director must also approve an exempt employee on introductory status to take compensatory time earned.

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C2 - Employment

NYSCEF DOC. NO. 1304 RECEIVED NYSCEF: 03/06/2023

NRA

SUBJECT:	EQUAL EMPLOYMENT OPPORTUNITY	EFFECTIVE:	02/01/11
		PAGE NO.:	C-1.07

It is the NRA's policy and practice to provide equal opportunity to its employees and applicants. The NRA recruits, hires, transfers, and promotes for all positions without regard to race, religion, color, sex, age, marital status, ancestry, national origin, disability, genetic information, or any other classification as prohibited by law. Equal opportunity applies to all employment practices, including recruitment, screening and hiring, compensation, benefits, expense reimbursement, training and advancement opportunities, layoffs, termination, and all other conditions and privileges of employment.

Any employee with questions or concerns about any type of discrimination in the workplace is encouraged to bring these issues to the attention of their immediate supervisor or Human Resources. Employees can raise concerns and make reports without fear of reprisal. Anyone found to be engaging in any type of unlawful discrimination will be subject to disciplinary action, up to and including termination of employment.

The NRA's policy of non-discrimination and equal employment opportunity seeks to provide full equality of employment opportunity and to adhere to applicable laws and regulations.

NYSCEF DOC. NO. 1304 RECEIVED NYSCEF: 03/06/2023

NRA

SUBJECT: AT-WILLEMPLOYMENT EFFECTIVE: 02/01/11 PAGE NO.: C-1.08

The NRA follows the employment "at-will" rule which is the law in Virginia and other states. Either the employee or the NRA may terminate the employment relationship at any time and for any reason. Completion of the initial 90-day introductory period does not change an employee's status as an employee-at-will or in any way restrict the NRA's right to terminate such employment or change the terms or conditions of employment.

No NRA representative is authorized to modify this policy for any employee or to enter into any agreement, oral or written, contrary to this policy. Supervisory and management personnel are not to make any representations to employees or applicants concerning the terms or conditions of employment with the NRA which are not consistent with NRA's employment-at-will policy.

No NRA policy shall be construed to alter an employees "at-will" employment status.

NYSCEF DOC. NO. 1304 RECEIVED NYSCEF: 03/06/2023

NRA

SUBJECT: AMERICANS WITH DISABILITIES EFFECTIVE: 02/01/11 PAGE NO.: C-1.09

As stated in the NRA Equal Employment Opportunity policy, the NRA provides equal employment and advancement opportunities to all individuals who are qualified to perform the essential responsibilities of a job, including those employees or prospective employees who are handicapped, physically or mentally disabled or impaired. These individuals are protected from discrimination in job application procedures, hiring, promotions, discharge, compensation, job training, and other terms or conditions of employment. The NRA will follow all applicable federal and state guidelines regarding reasonable accommodation to qualified handicapped, disabled or impaired individuals.

NYSCEF DOC. NO. 1304 RECEIVED NYSCEF: 03/06/2023

NRA

SUBJECT: EMPLOYMENT OPPORTUNITY POSTING EFFECTIVE: 02/01/11 PAGE NO.: C-1.10

The NRA strives to promote and transfer qualified employees into positions that enhance career development and their knowledge of the NRA. In addition, the NRA encourages its employees to assist in employee recruitment. The NRA maintains an employment opportunity posting system to notify employees of available positions. Employment opportunity postings are placed on specially designated Human Resources bulletin boards and are available in hardcopy form in the Human Resources office.

To be considered for a transfer or promotion, an employee must meet the requirements of the new position, have held his/her current position for at least six months, have a satisfactory performance and attendance record, and have no adverse disciplinary actions in the preceding six months.

An employee can request specific information about a job opening or employment opportunity postings in general from the Human Resources Division. The Human Resources Division screens all job applicants, whether internal or external. Employees should not contact the hiring manager concerning a vacancy.

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NRA

SUBJECT:	PROMOTION/TRANSFER	EFFECTIVE:	02/01/11
		PAGE NO.:	C-1.11

The NRA is committed to the professional advancement of all its employees. On a regular basis, employees should discuss their career objectives and seek career guidance from their Manager, Director, and the Human Resources Division. Employees seeking to broaden, redirect, or advance their careers should contact the Human Resources Division with respect to employment opportunity postings in which they have a particular interest.

Employees may request and be considered for a promotion or transfer if they meet the requirements of the new position, have held their current position for at least six months, have a satisfactory performance and attendance record, and have no adverse disciplinary actions in the preceding six months. As with all NRA employment practices, the candidate who best meets the position requirements will be selected.

The NRA management may initiate job promotions or transfers in order to accommodate the Association's business needs. Transfers may be on a short- or long-term basis.

Employees who take a new position due to promotion or transfer will be placed on a three-month trial period. During this trial period, their ability to meet the essential requirements and responsibilities of the new position will be assessed. If management decides an employee is not suitable for the position, the employee will be terminated if another suitable position is unavailable. Employees in trial period status continue to accrue and earn vacation, sick leave, and compensatory time.

The NRA's employment-at-will policy remains in effect through the offer and acceptance of a promotion or transfer.

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NRA

SUBJECT:	EMPLOYMENT OF RELATIVES	EFFECTIVE: 02/01/11
		PAGE NO.: C-1.12

The NRA seeks highly motivated, proficient employees who believe in the mission and the standards of the NRA. The NRA wants to have the broadest base of applicants and employees; therefore, if qualified, relatives of NRA employees may be employed with the organization. Relatives include the following: spouse, parent, child, sibling, in-law, grandparent, grandchild, aunt, uncle, cousin, niece, nephew, or step-relative. The term also includes individuals with whom an employee has a close personal relationship, such as domestic partners, cohabitant and significant others.

Relatives of NRA staff members may be employed within the organization provided: (1) they do not have the same supervisor, (2) they are not in a supervisor/subordinate relationship, (3) neither holds a job that has influence over the other's employment, salary, or status, (4) their relationship does not adversely affect the safety, security or morale of the NRA or its employees, and (5) a real or perceived conflict of interest does not exist or where one employee exercises or appears to have influence over the other's compensation, performance evaluation, or job security. If an employee subsequently marries or cohabits with another employee, both may retain their positions provided these are consistent with the provisions established herein. To avoid the appearance of favoritism or discrimination, the employment status of relatives in these situations must be approved in writing by the respective officer.

The utilization of consultants and temporary agency employees must be consistent with this policy.

The policy is enforced by the Human Resources Division in compliance with all applicable laws.

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NRA

SUBJECT:	PART-TIME & TEMPORARY EMPLOYEES	EFFECTIVE:	02/01/11
		PAGE NO.:	C-1.13

It is the policy of the NRA to use part-time and temporary personnel whenever specific Association needs or goals can best be served by employing part-time or temporary employees, such as periods of peak workload, employee absences, a one-time project requirement, or an ongoing function that does not require full-time staffing. Employment on a part-time or temporary status is by mutual consent and is governed by the NRA at-will employment policy.

Part-Time Employees

A part-time employee is an individual who is hired for an indefinite period, but who regularly works less than a full work week (37-1/2 hours). Part-time employees may be entitled to a variety of NRA benefits depending on the number of hours they regularly work or the number of hours worked in a year. Part-time employees may qualify for family or medical leave (please refer to the Family and Medical Leave Policy).

Regular Part-Time Employees

A regular part-time employee is regularly scheduled to work at least 30 hours per week. Regular part-time employees are eligible for medical, dental, life, AD&D, and short/long-term disability insurance on the same terms and conditions as full-time employees. They accrue and earn prorated vacation (annual leave) and sick leave upon completing the introductory period. They will receive pay for their regularly scheduled hours for the holidays or administrative leave with pay for facility closings that occur on their regularly scheduled work day.

Part-Time Employees

Part-time employees are regularly scheduled to work <u>less than 30 hours per week.</u> They will receive holiday pay or administrative leave with pay for facility closings if the holiday or facility closing occurs on a regularly scheduled work day. Part-time employees who work at least 20 hours per week are eligible to accrue and earn prorated vacation (annual) and sick leave upon completing the introductory period.

Temporary Employees

A temporary employee is an individual who is hired for a specified and limited period, either on a full-time or part-time basis, including on an on-call basis. Temporary employees are paid only for the hours they work. They are ineligible for vacation, sick leave, holiday or administrative leave with pay. Generally, assignments for temporary employees will not exceed 90 days, unless they work on an on-call basis.

All employees are eligible for participation in the 401(k) Plan after 90 days of employment.

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NRA

SUBJECT: INDEPENDENT CONTRACTORS

EFFECTIVE: 02/01/11
PAGE NO.: C-1.14

It is the policy of the NRA to use independent contractors (consultants) whenever specific Association needs or goals can best be served by employing an independent contractor. Assignments should be well defined in content, duration, and outcome. To qualify as an independent contractor, the individual must meet all guidelines set forth by the IRS. Generally, an independent contractor is retained when the existing staff does not have the requisite skills to achieve the task. Independent contractors are selected on the basis of their qualification for the job, without regard to race, religion, color, sex, age, marital status, ancestry, national origin, handicap, disability, veteran status, or any other classification as prohibited by law.

The decision to use an independent contractor can be made by a Division Director with approval of an NRA Officer. Depending upon the nature of the assignment, independent contractors may be paid by the project, day, or hour. Human Resources and the Office of the General Counsel should be consulted to establish that an individual qualifies as an independent contractor and the office of General Counsel must be provided with the draft contract agreement for its review and sign-off prior to contract execution.

Independent contractors must sign a Contractor Confidentiality Agreement with the NRA prior to starting on a project. The signed agreement should be retained in the appropriate project file. The Human Resources Division maintains a supply of standard Contractor Confidentiality Agreements.

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NRA

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SUBJECT: MINORS **EFFECTIVE: 02/01/11** PAGE NO.: C-1.15

The NRA complies with federal, state, and local minimum age limits for employment. No person under 18 years of age may be employed in any operation or occupation which is determined to be hazardous in nature or injurious to health. The Human Resources Division determines if a position is unsuitable for a person under 18 years of age. All applicants who have not yet reached their 19th year must submit a proper age certificate to the Human Resources Division at the time of application.

The above guidelines also apply for volunteers.

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NRA

SUBJECT: OUTSIDE EMPLOYMENT

EFFECTIVE: 02/01/11
PAGE NO.: C-1.16

It is the policy of the NRA to permit its employees to engage in outside work or hold other paid positions, subject to certain restrictions outlined below.

Full-time employees may be permitted, but are not encouraged, to engage in outside employment or other work activity. Division Directors and above and certain designated employees are expected to devote all of their working energies to the performance of their NRA duties and, therefore, not accept paid outside positions.

The NRA requires that employees' activities and conduct away from the job must not compete or conflict with or compromise its interests, or adversely affect job performance and the ability to fulfill all essential responsibilities to the NRA.

Employees must obtain prior approval from their Division Director and Human Resources before any outside employment or other work activity is undertaken. Failure to do so may result in disciplinary action, up to and including termination.

Employees are not allowed to solicit or conduct any outside business during paid working hours.

Employees may not perform any services for pay for NRA members on non-working time that are normally performed by NRA personnel. Employees may not use any NRA tools or equipment or use any NRA proprietary information to perform outside work.

Employees may use approved vacation (annual) leave to perform outside work assignments. Employees may not use sick leave or compensatory time to perform outside work.

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NRA

SUBJECT: PERFORMANCE APPRAISALS

EFFECTIVE: 02/01/11
PAGE NO.: C-1.17

It is the policy of the NRA that the job performance of each employee be evaluated informally periodically by the employee's supervisor. The NRA has a formal performance appraisal system, conducted on the employee's anniversary date of hire, because it believes such a system encourages high levels of performance, assures communication and a clear understanding between supervisors and subordinates, provides feedback, identifies goals, and leads to a level of effort that will best serve the members of the NRA. The NRA's performance appraisal system is designed to achieve the following objectives:

To ensure employees are aware of assigned duties and responsibilities;

To establish standards for acceptable job performance;

To provide feedback on acceptable job performance;

To tie individual performance goals into Division goals.

The performance appraisal form is a vehicle for formalizing the counseling the employee has received throughout the year and a chance to set future goals. Supervisors will be regularly communicating their expectations, monitoring and adjusting goals, monitoring results, providing feedback and coaching.

Employees are encouraged to initiate discussions about their performance with their supervisors on a regular basis.

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NRA

SUBJECT: CONFLICT RESOLUTION AND DISCIPLINARY ACTION EFFECTIVE: 02/01/11 PAGE NO.: C-1.18

The NRA requires employees to adhere to established policies, procedures, regulations, practices, and high standards of job performance. The NRA gives employees the opportunity, when reasonable and appropriate; to improve unsatisfactory performance or conduct that could lead to termination. Generally, such opportunities will be provided progressively; but in some instances, other disciplinary action or immediate termination of employment may be warranted.

Employees who are experiencing performance difficulties or conflicts on the job are encouraged to discuss these difficulties with their supervisor/manager. If the problems or conflicts persist, employees are encouraged to seek the advice of their Division Director and the Human Resources Division.

In an effort to maximize the contributions of each employee, supervisors coach and counsel employees informally. If sufficient improvement does not occur, the supervisor, in conjunction with the Human Resources Division, may implement formal disciplinary action.

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C3 - Personnel Records

NYSCEF DOC. NO. 1304 RECEIVED NYSCEF: 03/06/2023

NRA

SUBJECT: PRIVACY OF EMPLOYEE INFORMATION EMPLOYEE RESPONSIBILITY to UPDATE INFORMATION PAGE NO.: C-1.19

It is the policy of the NRA to include information in personnel files that is necessary to conduct business, provide benefits to its employees, or as required by federal, state, or local laws.

Privacy of Employee Information

The NRA is committed to protecting and respecting information about its present and former employees. Personnel files include documentation of employment-related decisions, personal data required for benefits administration, and documents and records that comply with government record keeping and reporting requirements. Access to personnel files is restricted to a need-to-know basis. This includes the employee, a direct or prospective supervisor or manager, hired auditors and other authorized employees of the Association. Representatives of government or law enforcement agencies, in the course of their business, may be allowed access to file information. This decision will be made at the discretion of the Human Resources Division in response to the request, a legal subpoena, or court order.

Persons receiving a request for information about a present or former employee are expected to refer such a request to the Human Resources Division for response.

The Human Resources Division maintains the official NRA personnel files.

Employee Responsibility to Update Personal Information

Each employee provides Human Resources with personal data required for benefits administration when they are hired. It is the employee's responsibility to notify Human Resources in a timely manner of changes to the following information:

Name;

Address;

Telephone Number;

Marital Status (for benefits and tax withholding purposes only);

Number of Dependents;

Addresses, telephone numbers, and social security numbers of dependents and spouses or formerspouses (for insurance purposes only);

Beneficiary designation for any of the NRA's insurance, disability, and pension plans;

Person(s) to be notified in case of emergency.

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NRA

SUBJECT: INSPECTION AND CORRECTING OF PERSONNEL FILES, EMPLOYMENT VERIFICATIONS EFFECTIVE: 02/01/11 PAGE NO.: C-1.20

Inspection of Personnel Files

Employees may inspect their own personnel records and may have copies of documents but may not remove documents in the file. Such inspections must be requested in writing to the Human Resources Services Division and will be scheduled at a mutually convenient time. All inspections will be conducted in the presence of a representative of the Human Resources Services Division. If an employee requests copies of documents in his/her file, they will be made by a member of the Human Resources Services Division within five business days from the request.

Only supervisors and management who have an employment-related "need-to-know" requirement for information about another employee may inspect the files of that employee. Such inspections must be approved and supervised by the Human Resources Services Division.

Correcting Personnel Files

An employee who feels that his/her personnel file is incomplete and/or inaccurate may submit a written request to the Human Resources Service Division that his/her file be revised. If such a request is not granted, the employee will be allowed to add a statement of disagreement to his/her file, signed and dated, and witnessed by a member of the Human Resources Services Division.

Employment Verifications

Requests from outside NRA for personnel information concerning applicants, employees, and former employees are to be referred to the Human Resources Services Division.

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C4- Compensation

NYSCEF DOC. NO. 1304 RECEIVED NYSCEF: 03/06/2023

NRA

SUBJECT: COMPENSATIONPROGRAM

EFFECTIVE: 02/01/11
PAGE NO.: C-1.21

It is the policy of the NRA to pay compensation which is competitive and non-discriminatory with similar jobs by other employers in the community. However, all compensation policy decisions take into consideration the NRA's overall economic condition and competitive position. The NRA sets salary administration guidelines to ensure that salaries are established and administered equitably and competitively. The NRA believes fair, competitive salaries attract and retain well-qualified employees.

The NRA also sets guidelines to provide equal employment and salary opportunity to each employee and employment candidate without regard to race, religion, age, color, sex, national origin, disability, veteran status, or as otherwise required by applicable federal, state, or local laws.

The specific objectives of these guidelines are to:

Attract and retain highly qualified employees;

Provide flexibility in setting salaries to meet changing economic and competitive conditions;

Reward individual performance;

Promote managerial accountability for administering pay;

Promote internal salary equity and external market competitiveness.

The Human Resources Division coordinates the periodic internal review of compensation policies to ensure that each job is evaluated and assigned an appropriate salary range. This review process identifies whether compensation accurately and fairly reflects each individual's responsibilities and performance.

The Human Resources Division also periodically participates in and conducts compensation surveys. This and other available information are used to set pay policy and to determine the relative competitive position of the Association's pay structure.

Employees should discuss any perceived salary inequity with their Division Director and the Human Resources Division.

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NRA

SUBJECT: OFFICE HOURS, PAY DAY, AND BUILDING ACCESS EFFECTIVE: 02/01/11 PAGE NO.: C-1.22

The NRA has established a basic work week of 37.5 hours, Monday - Friday. Normal business hours are from 8:30 AM - 5:00 PM. Regular full-time employees work 37.5 hours per week with a one-hour lunch break. Regular full-time employees may take two 15-minute breaks each day, one in the morning and the other in the afternoon. Breaks and lunch hour must be scheduled in order to ensure effective operations within each department/division.

The NRA may change the regular work week for any or all employees as it deems necessary for efficient operation. Employees may request Flextime (see Flextime Policy) in order to regularly start or end the work day earlier or later, but must still work 37.5 hours per week. Any deviation from normal business hours must have prior approval from the Manager and Division Director.

The NRA work week runs from 12:01 AM Sunday - 12:00 midnight Saturday. The NRA pay period covers two work weeks. Fully completed and authorized time sheets must be submitted to the Human Resources Division by 10:00 AM on the Friday before each payday. It is each employee's responsibility to promptly and correctly submit his/her time sheet. Payroll deposit or pay checks are issued every other Thursday.

Pay Advances

The NRA does not provide pay advances on unearned wages to employees or advances outside the normal pay cycle. If a regular payday falls during an employee's vacation, the employee may receive his or her wages before departing for vacation. A request to the Human Resources Division, approved by the Division Director, must be submitted at least fifteen (15) days prior to your last day of duty before you commence your vacation. Advance checks will not include any overtime computations. Overtime due will be remitted in the subsequent check. NRA policy requires that all vacation leave must have prior approval from your supervisor.

Building Access

The building is accessible to all employees from 7:00 A.M. to 6:00 P.M., Monday though Friday (except Holidays). After-hours and weekend building access before or after these times should be for NRA business purposes only. Employees seeking access to the building before or after normal building open hours and on weekends must obtain approval from their Division Director in advance. The Division Director's office will notify Security of the approval which may, in writing, include long-term, standing authorization. Employees entering or leaving the building after-hours, or on weekends, must sign in upon entering, and must sign out upon departure at the Security Desk on the first floor/North Tower.

Guests of NRA employees must be accompanied at all times and are restricted to business hours only. Guests are not allowed in the building after-hours and on weekends unless employees obtain prior Division Director approval. All approved after-hours or weekend guests' access requests must be filed at the Security Desk in advance. The range is available to employees and the general public during its posted open hours.

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NRA

SUBJECT: OVERTIME FOR NON-EXEMPT EMPLOYEES

EFFECTIVE: 02/01/11
PAGE NO.: C-1.23

It is the policy of the NRA that all non-exempt employees (eligible for overtime in compliance with the Fair Labor Standards Act) will receive overtime compensation as follows:

Overtime work must be approved in advance by the Division Director prior to being worked.

Regular rate of pay is paid between 37.5 hours and 40 hours.

One and one-half times the regular hourly rate is paid for all hours worked in excess of 40 hours in any one work week in accordance with the provisions of the Fair Labor Standards Act, and any applicable state or local statute or regulation. When there is a difference between applicable federal and state law, the law which governs is that most favorable to the employee. Hours worked are considered only hours actually worked by an employee and hours recorded as jury or witness duty. When calculating overtime, hours paid as a result of an NRA approved holiday, annual leave, sick leave, administrative leave with or without pay or other hours off with pay **ARE NOT** included as hours worked.

Overtime will be paid in the regularly scheduled pay check for the pay period in which it is recorded.

Holiday pay for non-exempt employees required to work due to shift work, a flextime schedule or as required by management, will be paid at the regular hourly rate for a full, 7.5 hour work day (regardless of the number of hours worked), and an additional one and one-half times the regular rate for each hour worked.

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NRA

SUBJECT: MEAL AND TRAVEL EXPENSES INCURRED DURING EXTENDED WORK HOURS

EFFECTIVE: 02/01/11 PAGE NO.: C-1.24

Employees may receive reimbursement for certain meal or travel expenses if they are required to work extended hours in the performance of their regular job at their regular location. To be eligible for reimbursement:

The extended hours and meal and/or travel expenses are authorized in advance;

Receipts are required in order to be reimbursed for meals or taxis;

To receive reimbursement for dinner, work exceeds 11.5 hours inclusive of 8:00 PM;

To receive reimbursement for lunch, work on Saturday or Sunday exceeds 5 hours inclusive of 1:00 PM, unless Saturday or Sunday is a regularly scheduled work day;

To receive reimbursement for lunch and dinner on a weekend, work exceeds 11.5 hours inclusive of 1:00 PM and 8:00 PM, unless it is a regularly scheduled work day;

To receive travel expenses, i.e. taxi fare, work exceeds 11.5 hours inclusive of 8:00 PM and the employee would otherwise take public transportation or a car/van pool;

Reimbursement will be made from a properly completed, authorized expense report.

When Committee Meetings are held at Headquarters and the NRA Cafe is open, attendees are expected to take their meals in the Cafe.

Additional information is contained in the NRA Travel and Business Expense Reimbursement Guidelines in the Office of the Treasurer.

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NRA

SUBJECT:	TIME REPORTING	EFFECTIVE:	02/01/11
		PAGE NO.:	C-1.25

All employees must complete, sign and have approved an electronic time sheet each pay period, recording all time worked and all leave hours taken. All hours in an employee's normal work schedule must be accounted for each pay period. The Fair Labor Standards Act requires employers to maintain time sheets for all non-exempt employees (full- time, part-time, and temporary non-exempt employees). All exempt employees must record and have approved all full-day leave time taken each pay period. Exempt employees on approved FMLA leave must account for all leave hours taken (partial or full day increments.)

Unless non-exempt employees have worked additional hours beyond a normal schedule, the combination of actual hours worked and any leave hours used should not exceed 37.5 hours in a work week. As per NRA policy, any use of leave requires prior supervisory approval.

Employees are reminded that their time sheets are legal documents and are the basis on which they are paid, receive vacation, sick, etc. Time sheets should be completed accurately and submitted according to the payroll schedule. Any errors on a submitted time sheet must be corrected by contacting the Human Resources Division immediately. Any misrepresentation or inaccurate reporting of time worked is a violation of the law and NRA policy, and may result in disciplinary action, up to and including termination.

Your Manager, Division Director, or the Human Resources Division can answer your time sheet related questions.

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NRA

SUBJECT: WAGEGARNISHMENTS EFFECTIVE: 02/01/11 PAGE NO.: C-1.26

The NRA complies with all requirements for writs of garnishment or attachment, a notice of levy by any taxing authority, or any other similar order requiring payment of a portion of an employee's compensation to someone other than the employee.

The General Counsel of the NRA or his/her designee is the only person authorized to receive a writ or notice. The Human Resources Division coordinates and processes the withholding order. The Human Resources Division will notify the employee that deductions will commence, the amount, and the duration. The amount deducted shall not exceed the amount permitted by law.

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C5 – Time Off

NYSCEF DOC. NO. 1304 RECEIVED NYSCEF: 03/06/2023

NRA

SUBJECT: FACILITY CLOSINGS, LIBERAL LEAVE, DELAYED
ARRIVALS, ADMINISTRATIVE LEAVE
WITH/WITHOUT PAY

| EFFECTIVE: 02/01/11 |
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The NRA is committed to providing its members with quality and timely services and programs. Therefore, employees are expected to make every reasonable effort to arrive at work on time, prepared to perform their jobs. From time to time, however, emergencies such as inclement weather, physical damage to an NRA facility, a major failure to the public transportation or road system will necessitate employees to be late, leave work early, or not come to work. The NRA may also decide to close facilities for part or all of a day for various emergencies (such as unsafe working conditions, severe inclement weather, etc.). The following guidelines provide information on the alternatives available to employees on taking leave during such emergencies. Your Manager, Division Director, Human Resources, or Director of Administrative Services can answer your facility closing, liberal leave, delayed arrival, delayed opening, and related questions.

Closings established by the NRA/Administrative Leave With Pay

The Executive Vice President or his/her designee is responsible for deciding when to close an NRA facility:

- For an entire day or part of a day;
- For all employees, specially designated employees, or all but essential personnel.

When making such decisions, the NRA will balance concerns for the safety of its employees with the need to provide ongoing operations, services and support to our members.

When the NRA closes a facility for a day or implements a delayed opening, administrative leave with pay for the number of hours for which the facility is closed is granted to all full-time and regular part-time employees who would otherwise have worked those hours. Part-time staff will be credited for administrative leave with pay for their regularly scheduled hours. Temporary employees are not eligible for Administrative leave with pay.

If the NRA facility officially closes early, employees who are at work will charge administrative leave with pay for the remainder of the day. Employees on annual or sick leave or using compensatory time will continue to charge these leave categories and will not receive administrative leave with pay for these hours.

By calling the NRA Weather Advisory Line at (703)267-1010, staff of NRA can be informed of initiated delayed openings or facility closings. If early dismissal is being implemented, Division Directors will inform their staff. When inclement weather occurs overnight, employees should listen to The NRA Weather Advisory Line to be informed on how the NRA is handling the emergency for its employees.

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Liberal Leave

NYSCEF DOC. NO. 1304

A notice of Liberal Leave means the NRA facility is open. Employees can exercise their judgment to arrive late, leave early, or not come to work at all. An employee is allowed to use accrued annual (vacation) leave and accrued compensatory time, to make up the time within the guidelines detailed below, or charge leave without pay if the employee does not have any accrued annual or compensatory time without prior approval when liberal leave is implemented. The NRA Weather Advisory Line system will be used to inform employees of NRA initiated liberal leave. Your Manager, Division Director, Human Resources, or Director, Administrative Services can answer your questions on liberal leave.

Inform your Supervisor

When an employee elects to use liberal leave, he/she must inform his/her supervisor within a reasonable time frame that he/she is using liberal leave, as well as the anticipated number of hours of liberal leave being used. Employees must call before work hours and leave a message on the supervisor's or Division Director's voice mail extension.

Make-Up Time

Non-exempt employees may make up liberal leave within the same work week in which it was taken. Exempt employees may make up liberal leave within the same pay period in which the liberal leave was taken. Make-up time must be coordinated with your supervisor.

Essential Personnel

During emergencies, the NRA may elect to close for all but essential personnel. Each Division Director has the responsibility of identifying essential personnel who are expected to be at the facility during emergency closings.

Employees on Sick or Vacation Leave, using Compensatory Time, or Time Off Without Pay when an **Emergency Closing is invoked**

When the NRA officially opens late or closes for an entire day, employees on sick or vacation leave or using compensatory time, should charge their time for the day or the period of time the office opened late to administrative leave with pay. Employees who are on sick or annual leave or using compensatory time when liberal leave or an NRA initiated early dismissal is invoked should continue to charge their time to sick or annual leave, or compensatory time.

Facilities outside the Washington, D.C. Metropolitan Area

Outside the Washington, D.C. Metropolitan area, the Director in charge of the facility or his/her designee in conjunction with the EVP or his/her designee is responsible for deciding to close an NRA facility. These same guidelines apply to remote facilities.

Use good judgment

Please exercise good judgment concerning the safety and wisdom of your traveling to or from work during a weather-related emergency. It is not in your or the NRA's best interest to jeopardize your safety.

NYSCEF DOC. NO. 1304 RECEIVED NYSCEF: 03/06/2023

NRA

SUBJECT: ADMINISTRATIVE LEAVE WITH PAY

EFFECTIVE: 02/01/11
PAGE NO.: C-1.28

The NRA grants administrative leave with pay under the following circumstances:

When the NRA elects to close a facility due to special or emergency conditions; When an NRA employee is relocating at the request of the NRA; During the NRA sanctioned functions.

Administrative leave with pay for the number of hours for which the facility is closed is granted to all employees who would otherwise have worked those hours. Regular part-time and part-time staff will be credited for administrative leave with pay for their regularly scheduled hours. Temporary staff is ineligible for administrative leave with pay. Approved administrative leave with pay should be recorded on employee time sheets as "regular" hours worked.

The Facility Closing, Liberal Leave, Delayed Arrivals Policy provides guidance on charging time when facilities are closed.

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NRA

SUBJECT:	ANNUAL LEAVE	EFFECTIVE: 02/01/11
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The NRA believes that both employees and the NRA benefit when employees take annual vacation leave. Annual leave provides an employee with the opportunity to recharge and refocus. Each employee is encouraged to utilize his/her annual leave each year. Accordingly, the NRA annual leave policy is structured to support taking annual leave as it is earned.

Effective January 1, 1994 annual leave is earned according to the following schedule:

Exempt and Non-exempt Employees

Year 1 through 2	10 days annually (2.88 hours per pay period)
Year 3 through 4	12 days annually (3.46 hours per pay period)
Year 5 through 9	15 days annually (4.33 hours per pay period)
Year 10 through 19	20 days annually (5.77 hours per pay period)
Year 20 and above	25 days annually (7.21 hours per pay period)

Assistant Directors and Deputy Directors

Year 1 through 5	15 days annually (4.33 hours per pay period)
Year 6 through 19	20 days annually (5.77 hours per pay period)
Year 20 and above	25 days annually (7.21 hours per pay period)

Managing Directors, Directors and Deputy Executive Directors

Year 1 through 19	20 days annually (5.77 hours per pay period)
Year 20 and above	25 days annually (7.21 hours per pay period)

Officers and Executive Directors

Year 1 and above 25 days annually (7.21 hours per pay period)

* Regular Part-Time and Part-Time employees earn annual leave on a prorated basis. (See Part-Time and Temporary Policy)

New employees will be credited for and earn annual leave from date of hire. However, new employees are not entitled to use the leave until after they have satisfactorily completed the introductory period. Employees who do not satisfactorily complete the introductory period are not entitled to annual leave. A maximum of 225 hours of annual leave may be carried into a new year. Any annual leave hours in excess of 225 hours as of December 31 of a calendar year will be converted into sick leave hours, subject to accumulated sick leave maximum (see Sick Leave Policy). Upon termination from the NRA, up to 225 hours of accrued annual leave will be paid at the salary rate at the time of termination.

INDEX NO. 451625/2020 FILED: NEW YORK COUNTY CLERK 03/06/2023 10:02 PM NYSCEF DOC. NO. 1304 RECEIVED NYSCEF: 03/06/2023 C-1.29: 2 of 2 Employees are required to use all accrued annual leave before going on leave without pay status. Use of annual leave must be approved in advance by an employee's supervisor. No more than two weeks leave may be taken at any one time without supervisory approval, which must be secured well in advance. Supervisors will make every effort to accommodate employee's leave requests including two and three week vacation plans, but first consideration will be given to the needs of the NRA.

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NRA

SUBJECT: BEREAVEMENT LEAVE EFFECTIVE: 02/01/11 PAGE NO.: C-1.30

The NRA grants employees up to three days off with pay if there is a death in the employee's immediate family (defined as spouse, child, mother, father, sister, brother, grandmother, grandfather, grandchild), immediate in-laws (defined as mother- or father in-law, grandmother- or grandfather-in-law, grandchild-in-law, sister or brother-in-law), or for step-mother or father, step-brother or sister, or step-child. Employees may receive one or two days' bereavement leave for a relative not in the above list, if special circumstances exist.

The Division Director will consider the special circumstances, location of the funeral and other related factors when determining if and how much bereavement leave will be granted; however, no more than three days will be given. Division Directors are responsible for notifying Human Resources in writing of any bereavement leave approvals they have issued.

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NRA

SUBJECT: COMPENSATORY LEAVE EFFECTIVE: 02/01/11 PAGE NO.: C-1.31

The NRA recognizes that the nature of its work may place unusual demands for weekend work on its exempt employees. Accordingly, any exempt employee who is required to work in excess of five hours on a Saturday or Sunday will receive 7.5 hours of compensatory leave. An exempt employee required to work five or more hours on an NRA holiday will receive 11 hours of compensatory leave. Travel time will be included in this calculation if it involves out-of-town travel for the convenience of the NRA. It does not include travel time from/to home and an NRA office or time spent for breakfast, lunch, or dinner while at an NRA office. Workload permitting, compensatory leave may be taken as annual leave, or it may be used to provide salary continuation in the event of illness, accident, medical, or family leave, however the policy for Sick Leave, Short Term Disability, and Long Term Disability will govern for any disabled employee. Employees may be required to use compensatory leave to provide salary continuation while they are on medical and family leave prior to going on leave without pay status. Compensatory leave will be accrued in a compensatory leave account. Accrued compensatory leave will not be paid to an employee upon resignation or termination of employment.

A Division Director may grant limited compensatory leave (actual time off from work not hours to be added to the compensatory leave account) to an exempt employee in recognition of a special work effort requiring extra long work hours. During the 90-day introductory period, an exempt employee is eligible to earn compensatory leave. At the discretion of the Division Director, compensatory leave taken may be granted during the introductory period.

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NRA

SUBJECT: **COURT LEAVE EFFECTIVE:** 02/01/11 **PAGE NO.:** C-1.32

The NRA provides Court Leave to all employees (excluding Temporary employees) who must serve on jury duty or testify as a subpoenaed witness in a judicial proceeding. Employees on Court Leave will receive their regular pay for any day or part of a day that they are required for jury duty or as a subpoenaed witness and may keep whatever court fees they may receive.

To be eligible for Court Leave, employees must notify their supervisor as soon as they receive the notice or subpoena. Providing prompt notice permits a supervisor to schedule work around the Court Leave. Failure to provide timely notification to your supervisor may result in Court Leave without pay. Employees must provide their supervisor with a copy of the subpoena or notice to serve on jury duty. The notice or subpoena copy will be forwarded to the Human Resources Division.

Employees on witness duty are expected to make a good faith effort to limit the amount of work time missed by attempting to have testimony scheduled during non-working time, or early or late in the day.

Employees on Court Leave are required to report to work on any days when court is not in session, their presence is not required, or court is dismissed early.

Employees appearing as a plaintiff, defendant, or for non-subpoenaed court appearance will not receive paid time off. Vacation or unpaid time should be used for these instances.

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NRA

SUBJECT: FAMILY AND MEDICAL LEAVE EFFECTIVE: 02/01/11
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U.S. Department of Labor - Wage and Hour Division

(Revised February 2010 - Fact Sheet #28 and #28A)

The Family and Medical Leave Act of 1993

Notice: On October 28, 2009, the President signed the National Defense Authorization Act for Fiscal Year 2010 (2010 NDAA), Public Law 111-84. Section 565 of the 2010 NDAA amends the military family leave entitlements of the Family and Medical Leave Act (FMLA). These amendments expand coverage for "qualifying exigency" leave to eligible employees with covered family members in the Regular Armed Force and coverage for "military caregiver leave" to eligible employees who are the spouse, son, daughter, parent, or next of kin of certain veterans with a "serious injury or illness". On December 21, 2009, the President signed the Airline Flight Crew Technical Corrections Act, Public Law 111-119, which modifies the FMLA eligibility requirements for flight crew members. This Fact Sheet does not incorporate these amendments to the FMLA.

The U.S. Department of Labor's Employment Standards Administration, Wage and Hour Division, administers and enforces the Family and Medical Leave Act (FMLA) for all private, state and local government employees, and some federal employees. Most federal and certain congressional employees are also covered by the law and are subject to the jurisdiction of the U.S. Office of Personnel Management or the Congress.

The FMLA entitles eligible employees to take up to 12 workweeks of unpaid, job-protected leave in a 12-month period for specified family and medical reasons, or for any "qualifying exigency" arising out of the fact that a covered military member is on active duty, or has been notified of an impending call or order to active duty, in support of a contingency operation. The FMLA also allows eligible employees to take up to 26 workweeks of job-protected leave in a "single 12-month period" to care for a covered servicemember with a serious injury or illness. See Fact Sheet #28A: The Family and Medical Leave Act Military Family Leave Entitlements on the pages to follow.

EMPLOYER COVERAGE

The FMLA applies to all public agencies, including state, local and federal employers, local education agencies (schools), **and** private-sector employers who employed 50 or more employees in 20 or more workweeks in the current or preceding calendar year, including joint employers and successors of covered employers.

EMPLOYEE ELIGIBILITY

To be eligible for FMLA benefits, an employee **must**:

- work for a covered employer;
- have worked for the employer for a total of 12 months;
- have worked at least 1,250 hours over the previous 12 months; and
- work at a location in the United States or in any territory or possession of the United States where at least 50
 employees are employed by the employer within 75 miles.

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While the 12 months of employment need not be consecutive, employment periods prior to a break in service of seven years or more need not be counted unless the break is occasioned by the employee's fulfillment of his or her National Guard or Reserve military obligation (as protected under the Uniformed Services Employment and Reemployment Rights Act (USERRA)), or a written agreement, including a collective bargaining agreement, exists concerning the employer's intention to rehire the employee after the break in service. See "FMLA Special Rules for Returning Reservists" on the pages to follow.

LEAVE ENTITLEMENT

NYSCEF DOC. NO. 1304

A covered employer must grant an eligible employee up to a total of 12 workweeks of unpaid leave during any 12-month period for one or more of the following reasons:

- for the birth and care of a newborn child of the employee;
- for placement with the employee of a son or daughter for adoption or foster care;
- to care for a spouse, son, daughter, or parent with a serious health condition;
- to take medical leave when the employee is unable to work because of a serious health condition; or
- for qualifying exigencies arising out of the fact that the employee's spouse, son, daughter, or parent is on active duty or call to active duty status as a member of the National Guard or Reserves in support of a contingency operation.

A covered employer also must grant an eligible employee who is a spouse, son, daughter, parent, or next of kin of a current member of the Armed Forces, including a member of the National Guard or Reserves, with a serious injury or illness up to a total of 26 workweeks of unpaid leave during a "single 12-month period" to care for the servicemember. For specific information regarding military family leave, see "Fact Sheet #28A: The Family and Medical Leave Act Military Family Leave Entitlements" on the pages to follow.

Spouses employed by the same employer are limited in the amount of family leave they may take for the birth and care of a newborn child, placement of a child for adoption or foster care, or to care for a parent who has a serious health condition to a combined total of 12 workweeks (or 26 workweeks if leave to care for a covered servicemember with a serious injury or illness is also used). Leave for birth and care, or placement for adoption or foster care, must conclude within 12 months of the birth or placement.

Under some circumstances, employees may take FMLA leave intermittently – taking leave in separate blocks of time for a single qualifying reason - or on a reduced leave schedule - reducing the employee's usual weekly or daily work schedule. When leave is needed for planned medical treatment, the employee must make a reasonable effort to schedule treatment so as not to unduly disrupt the employer's operation. If FMLA leave is for birth and care, or placement for adoption or foster care, use of intermittent leave is subject to the employer's approval.

Under certain conditions, employees or employers may choose to "substitute" (run concurrently) accrued paid leave (such as sick or vacation leave) to cover some or all of the FMLA leave. An employee's ability to substitute accrued paid leave is determined by the terms and conditions of the employer's normal leave policy.

"Serious health condition" means an illness, injury, impairment, or physical or mental condition that involves either:

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- Inpatient care (i.e., an overnight stay) in a hospital, hospice, or residential medical-care facility, including any period of incapacity (i.e., inability to work, attend school, or perform other regular daily activities) or subsequent treatment in connection with such inpatient care; or
- Continuing treatment by a health care provider, which includes:
 - (1) A period of incapacity lasting more than three consecutive, full calendar days, and any subsequent treatment or period of incapacity relating to the same condition that **also** includes:
 - treatment two or more times by or under the supervision of a health care provider (i.e., in-person visits, the first within 7 days and both within 30 days of the first day of incapacity); or
 - one treatment by a health care provider (i.e., an in-person visit within 7 days of the first day of incapacity) with a continuing regimen of treatment (e.g., prescription medication, physical therapy); or
 - (2) Any period of incapacity related to pregnancy or for prenatal care. A visit to the health care provider is not necessary for each absence; or
 - (3) Any period of incapacity or treatment for a chronic serious health condition which continues over an extended period of time, requires periodic visits (at least twice a year) to a health care provider, and may involve occasional episodes of incapacity. A visit to a health care provider is not necessary for each absence: or
 - (4) A period of incapacity that is permanent or long-term due to a condition for which treatment may not be effective. Only supervision by a health care provider is required, rather than active treatment; or
 - (5) Any absences to receive multiple treatments for restorative surgery or for a condition that would likely result in a period of incapacity of more than three days if not treated.

MAINTENANCE OF HEALTH BENEFITS

A covered employer is required to maintain group health insurance coverage for an employee on FMLA leave whenever such insurance was provided before the leave was taken and on the same terms as if the employee had continued to work. If applicable, arrangements will need to be made for employees to pay their share of health insurance premiums while on leave. In some instances, the employer may recover premiums it paid to maintain health coverage for an employee who fails to return to work from FMLA leave.

JOB RESTORATION

NYSCEF DOC. NO. 1304

Upon return from FMLA leave, an employee must be restored to the employee's original job, or to an equivalent job with equivalent pay, benefits, and other terms and conditions of employment. An employee's use of FMLA leave cannot result in the loss of any employment benefit that the employee earned or was entitled to before using FMLA leave, nor be counted against the employee under a "no fault" attendance policy. If a bonus or other payment, however, is based on the achievement of a specified goal such as hours worked, products sold, or perfect attendance, and the employee has not met the goal due to FMLA leave, payment may be denied unless it is paid to an employee on equivalent leave status for a reason that does not qualify as FMLA leave.

An employee has no greater right to restoration or to other benefits and conditions of employment than if the employee had been continuously employed.

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NOTICE AND CERTIFICATION

Employee Notice

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Employees seeking to use FMLA leave are required to provide 30-day advance notice of the need to take FMLA leave when the need is foreseeable and such notice is practicable. If leave is foreseeable less than 30 days in advance, the employee must provide notice as soon as practicable – generally, either the same or next business day. When the need for leave is not foreseeable, the employee must provide notice to the employer as soon as practicable under the facts and circumstances of the particular case. Absent unusual circumstances, employees must comply with the employer's usual and customary notice and procedural requirements for requesting leave. Employees must provide sufficient information for an employer reasonably to determine whether the FMLA may apply to the leave request. Depending on the situation, such information may include that the employee is incapacitated due to pregnancy, has been hospitalized overnight, is unable to perform the functions of the job, and/or that the employee's qualifying family member is under the continuing care of a health care provider.

When an employee seeks leave for a FMLA-qualifying reason for the first time, the employee need not expressly assert FMLA rights or even mention the FMLA. When an employee seeks leave, however, due to a FMLAqualifying reason for which the employer has previously provided the employee FMLA-protected leave, the employee must specifically reference either the qualifying reason for leave or the need for FMLA leave.

Employer Notice

Covered employers must post a notice approved by the Secretary of Labor explaining rights and responsibilities under the FMLA. An employer that willfully violates this posting requirement may be subject to a civil money penalty of up to \$110 for each separate offense. Additionally, employers must either include this general notice in employee handbooks or other written guidance to employees concerning benefits, or must distribute a copy of the notice to each new employee upon hiring. Employers may use the notice prepared by U.S. Department of Labor to meet this requirement.

When an employee requests FMLA leave or the employer acquires knowledge that leave may be for a FMLA purpose, the employer must notify the employee of his or her eligibility to take leave, and inform the employee of his/her rights and responsibilities under the FMLA. When the employer has enough information to determine that leave is being taken for a FMLA-qualifying reason, the employer must notify the employee that the leave is designated and will be counted as FMLA leave. Employers may use the optional forms WH-381 and WH-382 prepared by the U.S. Department of Labor to meet these notification requirements.

Certification

Employers may require that an employee's request for leave due to a serious health condition affecting the employee or a covered family member be supported by a certification from a health care provider. An employer may require second or third medical opinions (at the employer's expense) and periodic recertification of a serious health condition. An employer may use a health care provider, a human resource professional, a leave administrator, or a management official – but not the employee's direct supervisor – to authenticate or clarify a medical certification of a serious health condition. An employer may have a uniformly-applied policy requiring employees returning from leave for their own serious health condition to submit a certification that they are

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able to resume work. If reasonable safety concerns exist, an employer may, under certain circumstances, require such a certification for employees returning from intermittent FMLA leave. Employers may use the optional forms WH-380-E and WH-380-F prepared by the U.S. Department of Labor for obtaining medical certifications of serious health conditions.

UNLAWFUL ACTS

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It is unlawful for any employer to interfere with, restrain, or deny the exercise of any right provided by the FMLA. It is also unlawful for an employer to discharge or discriminate against any individual for opposing any practice, or because of involvement in any proceeding, related to the FMLA.

ENFORCEMENT

The Wage and Hour Division investigates complaints. If violations cannot be satisfactorily resolved, the U.S. Department of Labor may bring action in court to compel compliance. Individuals may also be able to bring a private civil action against an employer for violations.

OTHER PROVISIONS

Special rules apply to employees of local education agencies. Generally, these rules apply to intermittent leave or when leave is required near the end of a school term.

Salaried executive, administrative, and professional employees of covered employers who meet the Fair Labor Standards Act (FLSA) criteria for exemption from minimum wage and overtime under Regulations, 29 CFR Part 541, do not lose their FLSA-exempt status by using any unpaid FMLA leave. This special exception to the "salary basis" requirements for FLSA's exemption extends only to an "eligible" employee's use of leave required by the FMLA.

For additional information, visit our Wage and Hour Division Website: http://www.wagehour.dol.gov and/or call our toll-free information and helpline, available 8 a.m. to 5 p.m. in your time zone, 1-866-4-USWAGE (1-866-487-9243).

This publication is for general information and is not to be considered in the same light as official statements of position contained in the regulations.

U.S. Department of Labor Frances Perkins Building 200 Constitution Avenue, NW Washington, DC 20210 1-**866-4-USWAGE** TTY: 1-866-487-9243

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The Family and Medical Leave Act Military Family Leave Entitlements

Notice: On October 28, 2009, the President signed the National Defense Authorization Act for Fiscal Year 2010 (2010 NDAA), Public Law 111-84. Section 565 of the 2010 NDAA amends the military family leave entitlements of the Family and Medical Leave Act (FMLA). These amendments expand coverage for "qualifying exigency" leave to eligible employees with covered family members in the Regular Armed Forces and coverage for "military caregiver leave" to eligible employees who are the spouse, son, daughter, parent, or next of kin of certain veterans with a "serious injury or illness". On December 21, 2009, the President signed the Airline Flight Crew Technical Corrections Act, Public Law 111-119, which modifies the FMLA eligibility requirements for flight crew members. This Fact Sheet does not incorporate these amendments to the FMLA.

The National Defense Authorization Act for Fiscal Year 2008 (2008 NDAA), Public Law 110-181, amended the FMLA to allow eligible employees to take up to 12 workweeks of job-protected leave in the applicable 12-month period for any "qualifying exigency" arising out of the active duty or call to active duty status of a spouse, son, daughter, or parent. The 2008 NDAA also amended the FMLA to allow eligible employees to take up to 26 workweeks of job-protected leave in a "single 12-month period" to care for a covered servicemember with a serious injury or illness. These two types of FMLA leave are known as the military family leave entitlements.

EMPLOYER COVERAGE

The FMLA applies to all public agencies, including state, local and federal employers, local education agencies (schools), **and** private-sector employers who employed 50 or more employees in 20 or more workweeks in the current or preceding calendar year, including joint employers and successors of covered employers.

EMPLOYEE ELIGIBILITY

To be eligible for FMLA benefits, an employee must:

- work for a covered employer;
- have worked for the employer for a total of 12 months;
- have worked at least 1,250 hours over the previous 12 months; and
- work at a location where at least 50 employees are employed by the employer within 75 miles.

MILITARY FAMILY LEAVE ENTITLEMENTS

Military Caregiver Leave: A covered employer must grant an eligible employee who is a spouse, son, daughter, parent, or next of kin of a covered servicemember with a serious injury or illness up to a total of 26 workweeks of unpaid leave during a "single 12-month period" to care for the servicemember. A covered servicemember is a current member of the Armed Forces, including a member of the National Guard or Reserves, who is undergoing medical treatment, recuperation, or therapy, is otherwise in outpatient status, or is otherwise on the temporary disability retired list, for a serious injury or illness. A serious injury or illness is one that was incurred by a servicemember in the line of duty on active duty that may render the servicemember medically unfit to perform the duties of his or her office, grade, rank, or rating. The "single 12-month period" for leave to care for a covered servicemember with a serious injury or illness begins on the first day the

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employee takes leave for this reason and ends 12 months later, regardless of the 12 month period established by the employer for other types of FMLA leave. An eligible employee is limited to a combined total of 26 workweeks of leave for any FMLA-qualifying reason during the "single 12-month period." (Only 12 of the 26 weeks total may be for a FMLA-qualifying reason other than to care for a covered servicemember.)

Qualifying Exigency Leave: A covered employer must grant an eligible employee up to a total of 12 workweeks of unpaid leave during the normal 12-month period established by the employer for FMLA leave for qualifying exigencies arising out of the fact that the employee's spouse, son, daughter, or parent is on active duty, or has been notified of an impending call or order to active duty, in support of a contingency operation. Under the terms of the statute, qualifying exigency leave is available to a family member of a military member in the National Guard or Reserves; it does not extend to family members of military members in the Regular Armed Forces.

Qualifying exigencies include:

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- Issue arising from a covered military member's short notice deployment (i.e., deployment on seven or less days of notice) for a period of seven days from the date of notification;
- Military events and related activities, such as official ceremonies, programs, or events sponsored by the military or family support or assistance programs and informational briefings sponsored or promoted by the military, military service organizations, or the American Red Cross that are related to the active duty or call to active duty status of a covered military member;
- Certain childcare and related activities arising from the active duty or call to active duty status of a covered military member, such as arranging for alternative childcare, providing childcare on a non-routine, urgent, immediate need basis, enrolling or transferring a child in a new school or day care facility, and attending certain meetings at a school or a day care facility if they are necessary due to circumstances arising from the active duty or call to active duty of the covered military member;
- Making or updating financial and legal arrangements to address a covered military member's absence;
- Attending counseling provided by someone other than a health care provider for oneself, the covered military member, or the child of the covered military member, the need for which arises from the active duty or call to active duty status of the covered military member;
- Taking up to five days of leave to spend time with a covered military member who is on short-term temporary, rest and recuperation leave during deployment;
- Attending to certain post-deployment activities, including attending arrival ceremonies, reintegration briefings and events, and other official ceremonies or programs sponsored by the military for a period of 90 days following the termination of the covered military member's active duty status, and addressing issues arising from the death of a covered military member;
- Any other event that the employee and employer agree is a qualifying exigency.

Spouses employed by the same employer are limited to a **combined** total of 26 workweeks in a "single 12-month period" if the leave is to care for a covered servicemember with a serious injury or illness, and for the birth and care of a newborn child, for placement of a child for adoption or foster care, or to care for a parent who has a serious health condition.

FMLA leave may be taken intermittently whenever medically necessary to care for a covered servicemember with a serious injury or illness. FMLA leave also may be taken intermittently for a qualifying exigency arising

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out of the active duty status or call to active duty of a covered military member. When leave is needed for planned medical treatment, the employee must make a reasonable effort to schedule treatment so as not to unduly disrupt the employer's operation. Under certain conditions, employees or employers may choose to "substitute" (run concurrently) accrued paid leave (such as sick or vacation leave) to cover some or all of the FMLA leave. An employee's ability to substitute accrued paid leave is determined by the terms and conditions of the employer's normal leave policy.

NOTICE REQUIREMENTS

Employee Notice

NYSCEF DOC. NO. 1304

Employees seeking to use military caregiver leave must provide 30 days advance notice of the need to take FMLA leave for planned medical treatment for a serious injury or illness of a covered servicemember. If leave is foreseeable but 30 days advance notice is not practicable, the employee must provide notice as soon as practicable - generally, either the same or next business day. An employee must provide notice of the need for foreseeable leave due to a qualifying exigency as soon as practicable. When the need for military family leave is not foreseeable, the employee must provide notice to the employer as soon as practicable under the facts and circumstances of the particular case. Generally, it should be practicable to provide notice for unforeseeable leave within the time prescribed by the employer's usual and customary notice requirements.

An employee does not need to specifically assert his or her rights under the FMLA, or even mention the FMLA, when providing notice. The employee must provide "sufficient information" to make the employer aware of the need for FMLA leave and the anticipated timing and duration of the leave. Depending on the situation, such information may include, as applicable:

- that the requested leave is for a particular qualifying exigency related to the active duty or call to active duty status of a covered military member and the anticipated duration of the leave;
- that the leave is for a qualifying family member who is a covered servicemember with a serious injury or illness and the anticipated duration of the leave.

When an employee seeks leave due to a FMLA-qualifying reason for which the employer has previously provided the employee FMLA-protected leave, the employee **must** specifically reference either the qualifying reason for leave or the need for FMLA leave.

Employer Notice

Covered employers must post a notice approved by the Secretary of Labor explaining rights and responsibilities under the FMLA. Additionally, employers must either include this general notice in employee handbooks or other written guidance to employees concerning benefits, or must distribute a copy of the notice to each new employee upon hiring. Employers may use the notice prepared by U.S. Department of Labor to meet this requirement.

When an employee requests FMLA leave or the employer acquires knowledge that leave may be for a FMLA purpose, the employer must notify the employee of his or her eligibility to take leave, including a reason for noneligibility if the employee is determined not to be eligible. Such eligibility notice may be oral or written

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and should, generally, be given within five business days of the request for FMLA leave. Subsequent eligibility notice in the same 12-month leave period may be required when an employee's eligibility status changes. Employers also must inform employees of their rights and responsibilities under the FMLA, including giving specific written information on what is required of the employee.

When the employer has enough information to determine that leave is being taken for an FMLA-qualifying reason, the employer must notify the employee that the leave is designated and will be counted as FMLA leave. The employer must designate leave that qualifies as both leave to care for a covered servicemember with a serious injury or illness and leave to care for a qualifying family member with a serious health condition as leave to care for a covered servicemember in the first instance. The designation notice must be in writing and, generally, must be given within five business days of the determination. An employer also must notify the employee of the number of hours, days, or weeks that will be counted against the employee's FMLA entitlement. Employers may use the optional forms WH-381 and WH-382 prepared by the U.S. Department of Labor to meet these notification requirements.

CERTIFICATION REQUIREMENTS

NYSCEF DOC. NO. 1304

Employers may require that an employee's request for military family leave be supported by an appropriate certification. An employer may require that:

- leave for a qualifying exigency be supported by a copy of the covered military member's active duty orders and certification providing the appropriate facts related to the particular qualifying exigency for which leave is sought, including contact information if the leave involves meeting with a third party;
- leave to care for a covered servicemember with a serious injury or illness be supported by a certification completed by an authorized health care provider or by a copy of an Invitational Travel Order (ITO) or Invitational Travel Authorization (ITA) issued to any member of the covered servicemember's family.

Second and third opinions and recertification are not permitted for certification of a covered servicemember's serious injury or illness or of a qualifying exigency. An employer may use a health care provider, a human resource professional, a leave administrator, or a management official – but not the employee's direct supervisor – to authenticate or clarify a medical certification of a serious injury or illness, or an ITO or ITA. Additionally, an employer may contact the individual or entity named in a certification of leave for a qualifying exigency for purposes of verifying the existence and nature of the meeting. Employers may use the optional forms WH-384 and WH-385 prepared by the U.S. Department of Labor for obtaining certifications for qualifying exigencies and military caregiver leave, respectively.

UNLAWFUL ACTS

It is unlawful for any employer to interfere with, restrain, or deny the exercise of any right provided by the FMLA. It is also unlawful for an employer to discharge or discriminate against any individual for opposing any practice, or because of involvement in any proceeding, related to the FMLA.

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ENFORCEMENT

The Wage and Hour Division investigates complaints. If violations cannot be satisfactorily resolved, the U.S. Department of Labor may bring action in court to compel compliance. Individuals may also be able to bring a private civil action against an employer for violations.

For additional information, visit our Wage and Hour Division Website: http://www.wagehour.dol.gov and/or call our toll-free information and helpline, available 8 a.m. to 5 p.m. in your time zone, 1-866-4-USWAGE (1-866-487-9243).

This publication is for general information and is not to be considered in the same light as official statements of position contained in the regulations.

U.S. Department of Labor Frances Perkins Building 200 Constitution Avenue, NW Washington, DC 20210 1-866-4-USWAGETTY: 1-866-487-9243

USERRA-FMLA QUESTIONS AND ANSWERS 7/25/02 THE EFFECT OF THE UNIFORMED SERVICES EMPLOYMENT AND REEMPLOYMENT RIGHTS ACT ON LEAVE ELIGIBILITY UNDER THE FAMILY AND MEDICAL LEAVE ACT

1. What is the Uniformed Services Employment and Reemployment Rights Act (USERRA)?

USERRA is a Federal law that provides reemployment rights for veterans and members of the National Guard and Reserve following qualifying military service. It also prohibits employer discrimination against any person on the basis of that person's past military service, current military obligations or intent to join one of the uniformed services. Enacted in 1994. USERRA tracesits roots to 1940. It is codified at 38U.S.C. §4301 to § 4333.

2. What is the Family and Medical Leave Act (FMLA)?

FMLA is a Federal law that provides "eligible" employees of a covered employer the right to take up to 12 workweeks of unpaid, job-protected leave, during any 12 months, for the birth and care of a newborn, adoption or foster care, or a serious health condition of the employee or certain family members. An "eligible" employee is one who meets certain requirements specified in the statute. FMLA was enacted in 1993 and is codified at 29 U.S.C. § 2601 to § 2654 and at 5 U.S.C. § 6381 to § 6387, relating to Federal civil service employees.

3. What are the leave eligibility provisions of the FMLA?

In order to be eligible for leave under the FMLA, employeesmust meet several eligibility criteria. Two of these criteria affected by USERRA are: (1) the person must have been employed by the employer for at least 12 months; and (2) the person must have worked at least 1250 hours for that employer during the 12 month period preceding the start of the leave. The requirement of 1250 hours worked applies to persons employed by private employers, state and local governments, and the Postal Service.

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4. What effect does USERRA have on these requirements?

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USERRA requiresthat service members who conclude their tours of duty and who are reemployed by their civilian employers receive all benefits of employment that they would have obtained if they had been continuously employed, except those benefits that are considered a form of short-term compensation, such as accrued paid vacation. If a service member had been continuously employed, one such benefit to which he or she might have been entitled is leave under the FMLA. The service member's eligibility will depend upon whether the service member would have met the eligibility requirements outlined above had he or shenot performed military ser vice.

5. How should the 12-month FMLA requirement be calculated for returning service members?

USERRA requires that a person reemployed under its provisions be given credit for any months he or she would have been employed but for the military service in determining eligibility for FMLA leave. A person reemployed following military service should be given credit for the period of military service towards the months-ofemployment eligibility requirement. Each month served performing military service counts as a month actively employed by the employer. For example, someone who has been employed by an employer for 9 months is ordered to active military service for 9 months after which he or she is reemployed. Upon reemployment, the person must be considered to have been employed by the employer for more than the required 12 months (9 months actually employed plus 9 months while serving in the military service) for purposes of FMLA eligibility. It should be noted that the 12 months of employment do not have to be consecutive to meet this FMLA requirement.

6. How should the 1250 hours-of-service requirement be calculated for returning service members?

An employee returning after military service should be credited with the hours of service that would have been performed but for the period of military service in determining FMLA eligibility. Accordingly, a person reemployed following military service has the hours that would have been worked for the employer added to any hours actually worked during the previous 12-month period to meet the 1250 hour requirement. In order to determine the hours that would have been worked during the period of military service, the employee's preservice work schedule can generally be used for calculations. For example, an employee who works 40 hours per week for the employer returns to employment following 20 weeks of military service and requests leave under the FMLA. To determine the person's eligibility, the hours he or she would have worked during the period of military service (20 x 40 = 800 hours) must be added to the hours actually worked during the 12-month period prior to the start of the leave to determine if the 1250-hour requirement is met.

7. Where can I get more information about USERRA?

The Department of Labor's Veterans' Employment and Training Service (VETS) administers USERRA, pr ovides technical assistance/educational outr each, and investigates complaints. Infor mation about USERRA is available on the VETS Web site. The address is http://www.dol.gov/vets/. There you will find USERRA information as well as a directory of local VETS offices. This is one of a series of fact sheets highlighting U.S. Department of Labor programs. It is intended as a general description only and does not carry the force of legal opinion.

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NRA REQUEST FOR FAMILY OR MEDICAL LEAVE

Social Security Number:
Department:Division:
REASON FOR LEAVE
Family Leave
Birth Adoption Foster Care
Medical Leave
Self
Child Name
Spouse Name
Parent Name
Military Family Leave
Child Name
Spouse Name
Parent Name
Next of Kin Service Member Name
Please provide reason for medical leave and specify health care provider.

INDEX NO. 451625/2020 NEW YORK COUNTY CLERK 03/06/2023 10:02 PM NYSCEF DOC. NO. 1304 RECEIVED NYSCEF: 03/06/2023 C-1.33: 13 of 13 **Leave Period Requested** Continuous ___ Intermittent ___ Reduced Work Week To: _____ From: Describe requested intermittent or reduced work week schedule. I understand that my insurance benefits will continue under the same terms and conditions as provided for employees not on FMLA leave. I further understand that my share of the premiums will continue to be deducted from available paychecks while on FMLA leave. If I am on unpaid FMLA leave, I understand I'm responsible for submitting timely payment of my premiums to the NRA as outlined in the FMLA policy. Payment in full is due by the last day of the month being covered. If payments are 30 days late, my benefit coverage will cease while on FMLA leave as outlined in the FMLA policy. I certify the information I have provided is correct and understand that by providing false, incomplete, or misleading information, the NRA will terminate my employment. I understand that failure to return to work at the end of the approved leave period will be construed as my having resigned from the NRA. I also understand that if I do not return to work, my resignation will be effective the date I notify the NRA I will not be returning to work, or the day after the end of the approved leave if I do not notify the NRA. Continuation of benefits under COBRA will be calculated on the basis of applicable termination dates. **EMPLOYEE SIGNATURE** DATE

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NRA

SUBJECT: HOLIDAYS EFFECTIVE: 02/01/11 PAGE NO.: C-1.34

The NRA provides paid time off on certain national holidays for regular full-time and part-time employees whose normal workday falls on a scheduled holiday. Full-time employees will be paid holiday pay for seven and one-half hours. Regular Part-Time and Part-Time (see Part-Time & Temporary Employees Policy for definitions of part-time status) employees will be paid for their regularly scheduled hours for holidays that occur on their regularly scheduled work day. Holiday pay for non-exempt employees required to work due to shift work, a flextime schedule or as required by management, will be paid at the regular hourly rate for a full, 7.5 hour work day (regardless of the number of hours worked), and an additional one and one-half times the regular rate for each hour worked. Exempt employees required to work in excess of five hours on an NRA holiday will receive 11 hours of compensatory leave.

The national holidays generally observed by the NRA are:

New Year's Day January 1

Martin Luther King's Birthday 3rd Monday in January
Presidents Day 3rd Monday in February
Memorial Day Last Monday in May

Independence Day July 4

Labor Day 1st Monday in September

Veterans Day November 11

Thanksgiving 4th Thursday in November
Day After Thanksgiving 4th Friday in November

Christmas Day December 25

Holidays falling on Saturday will usually be observed on Friday; those falling on Sunday will usually be observed on Monday.

To be eligible for paid holiday leave, an employee must be on full pay status (i.e. work, annual leave, sick leave with pay, or other leave with pay status) on the workday preceding the scheduled holiday.

Holidays that fall during a period of paid leave (annual leave, sick leave, or other paid leave) will be charged to holiday and not against the employee's leave.

The NRA reserves the right to substitute or delete any Holiday from its Holiday schedule, or to change the day when it will be observed.

Refer to the Flextime policy for additional information on holiday pay.

NRA

SUBJECT:	MILITARY LEAVE	EFFECTIVE:	02/01/11
		PAGE NO.:	C-1.35: 1 of 3

It is the policy of the NRA to comply with all laws and regulations regarding military leave for training, contingency operations, and active duty, whether voluntary or involuntary. Military leave is considered leave without pay except under certain circumstances. Employee may be paid accrued, unused vacation and/or compensatory leave while performing military duty, however it is not required.

For Reservist Training

The NRA provides all regular Full- time and Regular Part-time employees who serve as a member of the Military Reserves or National Guard up to 10 days of differential paid leave per calendar year for reserve military training commitments. While on military leave the employee receives

Differential pay provided by the NRA -- the difference between their NRA regular rate of pay and their military pay (which includes base pay, flight pay, hazardous duty pay, etc.) Differential pay is paid only for the first 10 days of military leave.

Employees may receive annual leave while on reserve military training. Employees who request paid annual leave will receive it in addition to their differential pay.

To receive paid differential leave and/or annual leave pay, employees must submit to their supervisor and the Human Resources Division with at least 30 days advance notice, if possible, the following:

The notice for military training;

Arequest for differential pay; and/or

Arequest for annual leave.

Employees requesting differential pay must provide the Human Resources Division with a copy of their military pay within 30 days of returning to work. This amount will then be deducted from the next paycheck(s). Failure to submit the copy of military pay will result in the entire amount of NRA pay received while on military leave being deducted from the next paycheck(s).

Reservist Emergency Service, Contingency Operations, or Extended Training

Reservists will be on leave with pay status for the first five days of emergency service, contingency operations, or extended training (beyond the 10 days detailed above) in a calendar year. After the first five days of emergency service, employees may apply for and use their accrued annual or compensatory leave during this period.

Continuation of Benefits

The NRA will continue benefits through the NRA Employee Cafeteria Plan for employees on military leave for two years under the terms, conditions, and limitations for each benefit plan, **provided all premiums are paid by the employee each month.** For the first 12 months, the NRA will continue to make contributions towards the insurance premium on the same basis provided to active employees. For the second 12 months (months 13 - 24), the employee will be responsible for paying the entire insurance premium.

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Premium payments must be received by the NRA on a timely basis. If an employee elected to make premium contributions on a pre-tax basis, he/she may continue to do so provided he/she is receiving sufficient paid leave from the NRA. If not, the premium contributions will be made on an after-tax basis by the employee submitting payment directly to the NRA each month. Payment must be received in the Human Resources Division by the last day of each month being covered. Failure to provide timely payments (more than 30 days late) will result in the health care coverage being terminated. The NRA will provide written notice at least 15 days in advance that coverage will cease as of the last premium payment date if payment is not received. COBRA will become available to the employee when coverage is terminated.

Employee benefits will be reinstated when they return from military leave generally without any waiting periods or exclusions (e.g., pre-existing condition exclusions) except for service-connected illnesses or injuries.

Employees will continue to earn sick and annual leave for up to 12 weeks of military leave or for as long as they are on paid leave status, whichever is longer. Employees continue to accrue seniority as if he/she had been on the job during the period of military service.

Employees returning from military leave will be treated as if they had been continuously employed for pension purposes. This applies to vesting and benefit computation. Employees can make up missed 401(k) elective deferral contributions when they return to work, as required by law. If employees make up such 401(k) elective deferral contributions, the NRA will make any matching contributions that apply.

Return from Duty

NYSCEF DOC. NO. 1304

Employees returning from military service are entitled to be restored to his or her former position or to one of similar seniority, pay, and status, if he or she is qualified to perform the duties of the former position. Positions for which a serviceperson will have rights are based on the length of the person's intervening uniformed service.

Employees on military service less than 91 days will be entitled to the job he/she left or the job he/she would have attained if he/she had not left, whichever is better. For longer periods of military service, the employee is entitled to the job he/she left, the job he/she would have attained, or a job of like seniority, status and pay to the job left or the job that would have been attained, whichever is best.

The NRA will make reasonable efforts to update the skills of an employee who is not initially qualified for the position to which he or she is entitled, unless such efforts would create an undue hardship. We will provide refresher training and any training the employee would have received if he or she had remained on the job, before deciding on an employee's qualifications.

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Employee Responsibilities

NYSCEF DOC. NO. 1304

An employee is eligible for reemployment rights, if the employee meets five criteria:

The employee must hold a position that has a reasonable expectation of continuation indefinitely or for a significant period.

The employee must give notice to the NRA that he/she will be leaving for military service.

The employee must not exceed the five-year statutory limit on cumulative periods of military service.

Annual training and monthly drills are not counted against the cumulative total. The limit may be exceeded for service performed during war and it does not apply to some pilots.

The employee must be released from service under "honorable conditions."

The employee must report back to the NRA in a timely manner or submit a timely application for reemployment. The following general rules apply:

For periods of military service up to 30 consecutive days, the employee must report back to work for the first full regularly scheduled work period on the day following the completion of the period of service and safe transportation home, plus an 8-hour period of rest.

After a period of military service of 31-180 days, the employee is to submit to the NRA an oral or written application of reemployment not later than 14 days after completion of the period of service.

After a military service period of 181 days or more, the employee must submit an application for reemployment not later than 90 days after completion of the period of service.

Notification Requirement

Employees must provide their supervisor with prompt notice of their impending military leave requirement. If the employee is given alternative training dates, he/she should confer with his/her supervisor to determine the most convenient dates for the work load and work flow. Employees are expected to return to work within the time provided by law after completing training or emergency duty (as provided by law and NRA policy).

Coordination of Military Leave

Employees required to perform military service must contact their supervisor and the Human Resources Division as soon as possible. The Human Resources Division will coordinate with the employee all benefits, pay, re-employment rights and other pertinent information. The Human Resources Division will also complete the employee's time sheet each pay period while on military service.

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NRA

SUBJECT: RELIGIOUS HOLIDAYS **EFFECTIVE: 02/01/11** PAGE NO.: C-1.36

The NRA recognizes that from time to time some employees may wish to observe religious holidays that are not company holidays. The NRA will try to accommodate requests to take time off to observe religious holidays but may not be able to do so in every instance. Employees who are granted time off for religious observance may charge accrued annual or compensatory leave, or may take time off without pay. To allow their supervisor sufficient scheduling time, employees are required to request time off for religious observance at least 30 days in advance.

NRA

SUBJECT: SICK LEAVE EFFECTIVE: 02/01/11 PAGE NO.: C-1.37: 1 of 2

The NRA's sick leave policy is structured to provide salary continuation to employees if they are absent from work due to their own illness, accident, pregnancy, or to attend to a family member's (as defined under the Family and Medical Leave Act) illness or accident. Doctor and dental appointments, eye examinations, and the fitting of eyeglasses fall under sick leave.

Sick Leave hours are paid directly through payroll by NRA. Payments are taxable and reported as income on the annual W-2 statement.

Full-Time, Regular Part-Time or Part-Time employees who have satisfactorily completed their initial introductory period are eligible for sick leave. Upon completion of the initial introductory period, the employee will be credited for and earn sick leave computed back to his/her start date. Employees who do not satisfactorily complete the initial introductory period are not entitled to sick leave. No sick leave will be earned by an employee in a leave without pay status unless covered under the Family and Medical Leave policy. Association policy does not permit advancing sick leave. Sick Leave balances will not be paid to an employee upon resignation or termination of employment.

Sick Leave Eligibility

All full-time employees will earn 75 hours (10 days) of annual sick leave on January 1st of each year. Regular Part-time (30+ hours worked per week) and Part-time (20+ hours worked per week) will earn prorated hours based on their average total hours worked per week. New employees (hired after January 1st) will earn sick leave at a rate of 2.88 hours (prorated for Part-time employees) per pay period until the next following January 1st.

Sick Leave hours will be paid only for approved absences, including: illness, accidental injury, medical, dental or vision practitioner appointments, or to attend to a family member's (as defined under the Family and Medical Leave Act) illness or accident. Employees are required to use all accrued available leave before going on leave without pay status.

Approval for Sick Leave will be determined jointly by your Division Director and the Human Resources Division. Whenever possible, 48 hours prior permission must be secured from the supervisor for medical appointments. Employees must notify his/her supervisor no later than 30 minutes from the scheduled start time of any time being taken due to illness. An employee will be required to provide a doctor's certificate for repeated absences or lateness attributed to illness, injury, or family leave, or for absences of three or more consecutive days. The NRA reserves the right to require an employee to take sick leave if the employee's attendance and quality of work are adversely affected by illness, pregnancy, or injury. An employee who abuses the sick leave policy may be denied the use of sick leave with pay or be terminated.

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Accumulated Sick Leave

NYSCEF DOC. NO. 1304

Unused annual sick leave may be carried forward each year. Employees hired after January 1, 1998 may accumulate a maximum of 200 hours of sick leave. Employees hired prior to January 1, 1998 (grand fathered group) may carry forward all accumulated sick leave without a maximum limitation.

Extended Sick Leave

Benefits for an illness or injury (as defined under Sick Leave Eligibility) beyond 14 continuous calendar days, up to a maximum 11 weeks, will be covered under the NRA Employee Cafeteria Plan Short Term Disability (STD) income insurance policy. Benefits for an illness or injury (as defined under Sick Leave Eligibility) beyond 90 continuous calendar days will be covered under the NRA Employee Cafeteria Plan Long Term Disability (LTD) income insurance policy.

While under the STD or LTD policy, employees may use their accumulated sick leave to make up the difference between the insured benefit and full pay. Any Sick Leave payments provided by NRA will be reduced by any insured benefits paid. (See Short Term Disability Policy and / or Long Term Disability Policy for details on insured benefits.)

Sick Leave payments, while covered under the STD or LTD policy, will be deducted from an employee's accumulated sick leave balance on the pro-rata portion of total pay made by the NRA.

For example, an employee is absent from work because of an approved disability and receives STD insured benefits equal to 70% of salary. The NRA will pay Sick Leave equal to 30% of salary and reduce the accumulated sick leave balance by the number of hours that equate to the 30% portion. Alternatively, an employee is absent from work because of an approved disability and receives LTD insured benefits equal to 60% of salary. The NRA will pay Sick Leave equal to 40% of salary and reduce the accumulated sick leave balance by the number of hours that equate to the 40% portion up to a maximum of two years on LTD. If all available accumulated sick leave is exhausted, an employee will only receive the insured benefit, if approved.

If qualified, Sick Leave and disability will be designated as FMLA leave and will run concurrently with disability or Sick leave.

An employee who abuses the sick leave policy may be denied benefits and may be subject to other actions including, but not limited to, termination of employment. The NRA reserves the right to amend or terminate this sick leave policy at any time by providing notice to current employees. Any unused sick leave will not be paid to the employee upon termination.

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C6 – Work Environment

NRA

SUBJECT: HARASSMENT EFFECTIVE: 02/01/11
PAGE NO.: C-1.38: 1 of 2

The NRA promotes a productive work environment free from verbal or physical conduct which harasses or interferes with another employee's work performance or which creates a hostile environment. The NRA does not tolerate harassment of or by any of its employees.

Sexual harassment is considered to exist whenever there are unwelcome sexual advances, requests for sexual favors, or any other verbal or physical conduct of a sexual nature when:

Submission to the conduct is made either implicitly or explicitly a condition of the individual's employment; or

Submission to or rejection of the conduct is used as the basis for any employment decision affecting the harassed employee; or

The harassment has the purpose or effect of unreasonably interfering with the employee's work performance or creating an environment which is hostile to the employee.

Employees should be aware that inappropriate or repeated foul language or sexually oriented jokes, remarks, gestures, or displaying sexually explicit posters or cartoons may often be offensive to another employee and, therefore, constitute unacceptable behavior. Harassment based on race, age, country of national origin, religion, or any other classification prohibited by law is also unacceptable. This type of behavior includes saying racial slurs or derogatory statements about any of the protected classes, or telling racial, religious, sexual preference, foreign nationality, or age related jokes.

The NRA recognizes that employees' attendance at meetings, receptions, competitions, and other functions involving non-employees is frequently required. Although the NRA has no control over the behavior of individuals who are not NRA employees, the NRA will nonetheless attempt to protect employees from harassment by outsiders in these circumstances, including arranging seating and other staff assignments so as to avoid repetition of any reported problems. Accepting harassing behavior from members or others is not a condition of employment with the NRA.

An employee who feels he/she has been harassed should contact his or her immediate supervisor. If the complaint involves a supervisor, you should promptly notify a Division Director or an Officer. Any employee, supervisor or manager who becomes aware of any possible harassment of or by any employee should immediately advise the Division Director. The Division Director should promptly notify Human Resources. The Director will conduct an impartial investigation. Employees are required to cooperate in an investigation. A timely resolution of each complaint is to be reached and communicated to the parties involved. Retaliation against any employee for filing a complaint or participating in an investigation is strictly prohibited.

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Formal Resolution Procedures

All incidents of sexual harassment or inappropriate sexually oriented conduct should be reported. To initiate a formal investigation into an alleged violation of this policy, employees also must file a sexual harassment complaint with the supervisor and Human Resources. Complaints should be filed as soon as possible after an incident of alleged sexual harassment. To ensure the prompt and thorough investigation of a sexual harassment complaint, the complainant should provide as much of the following information as is possible:

The name, department, and position of the person or persons allegedly causing the harassment;

A description of the incident(s), including the date(s), location(s), and the presence of any witnesses;

The effect of the incident(s) on the complainant's position, salary, benefits, promotional opportunities, or other terms or conditions of employment;

The steps the complainant has taken to try to stop the harassment; and

Any other information the complainant believes to be relevant to the harassment complaint.

Information is revealed strictly on a need to know basis. The identity of the complainant is usually revealed to the respondent and witnesses. Human Resources takes steps to protect the complainant from retaliation. A copy of the investigation report and the final decision is included in the personnel file of the respondent only if the investigation concludes that the individual engaged in prohibited conduct. No record of a complaint is kept in the complainant's personnel file.

All information pertaining to a sexual harassment complaint or investigation is maintained by Human Resources. The Manager of Human Resources explains the procedures for handling information related to sexual harassment complaints and investigations to complainants and respondents.

Any employee, supervisor, or manager who is found to have engaged in harassment of another employee will be subject to disciplinary action, up to and including termination.

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NRA

SUBJECT: LIFE THREATENING ILLNESSES

EFFECTIVE: 02/01/11
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The NRA considers long-term, life-threatening, infectious, or other serious diseases as disabilities according to our policy on Equal Employment Opportunity (EEO) and the requirements of the Americans with Disabilities Act of 1990 and the Rehabilitation Act of 1973. Besides the provisions of the NRA's EEO policy on nondiscrimination and reasonable accommodation for disability, the following guidelines are intended to help managers in maintaining a work environment that is responsive to the workplace issues created by life threatening illnesses and the concerns of employees who may request management assistance.

The NRA does not discriminate against qualified individuals with life-threatening illnesses or disabilities. An employee's health condition is private and confidential. An employee with a life threatening illness is under no obligation to reveal his or her condition to a manager or any other employee of the NRA. Managers are expected to take careful precautions to protect the confidentiality of information regarding any employee's health condition.

An employee with a life threatening illness is expected to meet the same performance requirements applicable to other employees, with reasonable accommodation if necessary. If an employee experiences performance difficulties because of disability, managers will make reasonable accommodation to enable the employee to meet established performance criteria.

The NRA also recognizes its obligation to provide a safe work environment for all employees. Therefore, the NRA may obtain appropriate medical direction, when necessary, to ensure that an employee's condition does not pose a significant risk of substantial harm to himself/herself or to other employees.

The NRA offers the following resources to help employees and managers with respect to life-threatening or serious illnesses:

Management and employee education concerning life-threatening and serious illnesses; Confidential referral to supportive services for employees and dependents affected by life-threatening and serious illnesses; and

Benefits consultation to help employees in effectively managing health, leave, and other benefits.

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NRA

NYSCEF DOC. NO. 1304

SUBJECT: DRESS CODE EFFECTIVE 02/01/11 PAGE NO.: C-1.40

Consistent with NRA's corporate image and high standards, professional pride in personal appearance is as important as professional pride in one's work. The NRA expects its employees to be well-groomed, neat and clean in appearance, and in full compliance with the following Dress Code.

For men, appropriate business attire means suits or slacks (dress, khakis, or chinos) and sports jackets, shirts, and ties. Appropriate footwear includes wing-tips, loafers, dress boots, or rubber-soled shoes with socks. Athletic shoes are never appropriate. Ties are required at all times, unless a tie presents a safety hazard based on the business demands of a particular day.

For women, appropriate business attire means dresses, two-piece coordinates, suits with either skirts or slacks, and dress skirts or slacks with jackets or blouses, knit tops, or sweaters. Sleeveless tops are permitted, but should be worn with a jacket or sweater outside of the immediate office area. Appropriate footwear includes heels, flats, loafers, or rubber-soled shoes with hosiery or socks. Athletic shoes are never appropriate.

NRA makes reasonable accommodation for dress or grooming directly related to an employee's religion, ethnicity, disability, medical condition or dress requirements directly related to the individual business needs of a department (Mail Room, NRA Cafe, NRA Range, Engineers and Maintenance Crew) or requirements necessary for employee safety.

Friday of every week is considered to be Casual Day for all NRA employees, unless business requires more formal attire for meetings or in-person contact with members of the public. Whenever Board of Directors' or Committee meetings are scheduled at Headquarters on a Friday, all employees will be required to dress in business attire. Employees will be notified of the requirement to come to work in formal business attire whenever management identifies such a need.

Under Friday's casual dress code, men may wear dress slacks, khakis or chinos and open neck shirts in summer and shirts and/or sweaters in winter. Women may wear slacks or skirts and blouses and/or sweaters all year round. For men, inappropriate attire includes hats, sweatpants, sweatshirts, workout attire, jeans, shorts, t-shirts, tank tops, or sheer clothing. For women, inappropriate attire includes hats, sweatpants, sweatshirts, workout attire, jeans, shorts, t-shirts, tanks tops, bare-midriffs and spaghetti straps, sheer clothing, and skirts that are excessively short.

Managers and supervisors are responsible for interpreting and enforcing the dress code and will counsel employees whose appearance is inappropriate for the office. The manager or supervisor may request the employee to go home, change into suitable office attire, and return to the office to complete the normal work day. Managers and supervisors may require that the time away from the office be charged to annual leave or leave without pay. Disciplinary action is appropriate for dress that is offensive, excessively distracting, or in direct conflict with this express policy.

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NYSCEF DOC. NO. 1304 RECEIVED NYSCEF: 03/06/2023

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SUBJECT: SMOKING EFFECTIVE: 02/01/11 PAGE NO.: C-1.41

Under Fairfax County regulations, employees who smoke may do so in specially designated and ventilated rooms and locations. **Both smoking and non-smoking employees** are expected to cooperate with this policy. Failure to do so may result in disciplinary action, up to and including termination.

NRA

SUBJECT: FIREARMS IN THE WORKPLACE EFFECTIVE: 02/12/16 PAGE NO.: C-1.42

The National Rifle Association of America protects and defends the Constitution of the United States, especially the inalienable right of the individual American citizen to keep and bear arms as guaranteed by the Second Amendment to the Bill of Rights.

Employees are solely responsible for personal firearms brought into NRA Headquarters. When not in the employee's personal possession, firearms must be safely secured. It is NRA policy that employees at all times handle firearms safely and responsibly, and abide by all Federal, State and local laws regarding firearms and their use.

Employees may be held personally liable for the misuse of their firearms. Under no circumstances shall the NRA be held liable for an employee's misuse of a firearm.

Employees may bring in personal firearms for use on the NRA Range or for specific NRA purposes. Employees must never leave unsecured firearms in the building overnight.

Personal firearms may be left in NRA Headquarters overnight if:

- The personal firearms are properly secured in a safe; or,
- The personal firearms are used in conjunction with official NRA business and stored overnight in a safe, NRA vault, or other secure storage area approved by the Secretary, and are each tagged "Personal Firearm," along with the employee's name and extension. If stored overnight in a gun safe, vault or secure storage area approved by the Secretary and such tagging is impractical because of the official NRA business being conducted (e.g., photography of a firearm or use in a museum exhibit), the firearms shall be identified as personal firearms of the specified employee(s) through a method approved by the Secretary; or,
- The personal firearms are left with the Senior Curator and stored overnight in the Museum's Conservation Laboratory and are each tagged "Personal Firearm," along with the employee's name and extension.

Failure to strictly comply with these regulations will result in disciplinary action, including termination.

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	SUBJECT:	FLEXTIME/TELECOMMUTING (TELEWORK)	EFFECTIVE: PAGE NO.:	08/01/2016/ C-1.43
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Flextime

The NRA recognizes that Flextime (the ability to start and end work either earlier or later than the NRA standard work day of 8:30 - 5:00) may be advantageous to both employees and the NRA. The NRA recognizes that our prime responsibility is to provide services and support to our members within our standard operating hours. Providing such services also requires appropriate coordination among and between NRA departments and divisions. We believe that each Supervisor, in conjunction with the Division Director, can best determine how Flextime can effectively serve their Department and Division. To the extent Flextime serves the members, Department, Division, and the NRA, it may commence not earlier than 6:30 AM and cannot end later than 6:30 PM. Time allotted to lunch periods/breaks may not be utilized to shorten a workday. Flextime may be assigned on a regular, on-going basis, or as a temporary schedule adjustment.

Holidays which fall on a scheduled work day for employees who work on a regular, on-going flextime schedule, will be paid their regular scheduled number of hours worked as holiday pay. For example, if an employee normally works four days of ten hours, and a holiday falls on one of those days, the employee will be paid ten hours of holiday pay, not seven and one-half. If the employee must work on the holiday, as if it were a normally scheduled workday, then he/she will be paid holiday pay according to the employee's normal work schedule.

Employees who would like to work Flex hours should discuss this possibility with their Supervisor and Division Director. The approval of the Division Director is required before any employee begins working flextime hours. To be eligible for consideration of a flex schedule, employees must be in good standing, and have a substantial record of above-average job performance. Approval for flextime arrangements must be in writing and kept on file in Human Resources. The NRA has the right to cancel or suspend an employee's flextime privileges at any time, at the NRA's discretion.

Telecommuting/Telework

The NRA recognizes that our primary responsibility is to provide services and support to our members. Providing such services requires appropriate coordination among and between NRA departments and divisions. In view of this, the NRA believes business needs are best met through onsite attendance to facilitate the necessary coordination of effort. Therefore, the NRA does not permit full-time (5 days per work week) telecommuting or working from home (or other remote site) unless required for a specific position assigned to an off-site location (e.g., Field Representatives, Advancement Officers for remote regions, etc.), or to accommodate NRA's needs. Subject to the approval of the Division Director, top-level Executive, and Human Resources, and in keeping with business necessity, exceptions may be made to accommodate completion of a specific work assignment or project. This determination will be made on a case-by-case basis. To be eligible for consideration to telework, employees must be in good standing, and have a substantial record of above-average job performance. Approval for telecommuting/ telework arrangements must be in writing and kept on file in Human Resources. Telework is not a substitution for child care, annual or sick leave usage, and must serve a bona fide business purpose. Individuals with managerial and/or supervisory responsibilities are generally ineligible for telecommuting/telework. Non-exempt staff must record all time worked; overtime must be approved in advance, in keeping with NRA policy.

The NRA is under no obligation to approve telecommuting/telework requests, and may suspend or cancel any such arrangement at any time.

NYSCEF DOC. NO. 1304 RECEIVED NYSCEF: 03/06/2023

NRA

SUBJECT: PRIVATE BUSINESS SOLICITATIONS EFFECTIVE: 02/01/11 PAGE NO.: C-1.44

NRA employees are prohibited from on site solicitation of other employees, or individuals and entities outside of the NRA, for commercial purposes and from distributing literature on site in connection with commercial pursuits, groups, or interests. Such private business or other solicitation disrupts and interferes with ongoing NRA operations and must not be conducted on NRA time, or by means of NRA facilities including, but not limited to: telephones, computers, email, Internet access, fax machines, interoffice mail, voice mail and photocopiers.

Exceptions

Exceptions to this policy are: 1) personal items for purchase or sale may be listed on the NRA Bulletin Board; 2) solicitations approved by the Executive Vice President or his/her representative; and 3) NRA sanctioned activities.

Discipline

Employees who violate this policy are subject to discipline, up to and including termination.

NRA

SUBJECT:	COMPUTER HARDWARE	EFFECTIVE:	02/01/11
		PAGE NO.:	C-1.45

Hardware Policy

- The Information Services Division is responsible for the acquisition of all computer hardware.
- The Information Services Division maintains the inventory of the NRA's PCs, printers, and peripherals.
- Employees may not bring equipment from home and install it on a PC.

Equipment Maintenance

The Information Services Division provides for maintenance support of all NRA computers, printers, and associated peripherals. NRA staff having PC problems or equipment that needs service are directed to call the IS Service Center at ext 1555.

Equipment Installation/Relocation

The Information Services Division coordinates the installation or relocation of equipment. The location of every computer, printer, or associated peripheral is maintained as part of an inventory. Therefore, computer hardware should not be moved by the employee for any reason. For installation or relocation of computers, printers, or associated equipment, NRA staff are directed to call the IS Service Center at ext 1555.

Hardware Audits

The Information Services Division conducts periodic hardware audits of all NRA computers, printers, or associated peripherals.

Home Use

Computers, printers, and associated hardware cannot be removed for personal use without division director approval and a signed property receipt.

Violations

Any employee who violates this policy or uses NRA hardware for improper purposes will be subject to discipline up to and including the possibility of termination and/or legal action if warranted.

NRA

SUBJECT: COMPUTER SOFTWARE EFFECTIVE: 02/01/11
PAGE NO.: C-1.46: 1 of 2

Software Defined

Software is defined as a set of instructions that cause a computer to perform on or more tasks.

Software Policy

NRA respects all computer software copyrights and to adhere to the terms and conditions of all software licensing agreements to which the NRA is a party. The Information Services Division is charged with the responsibility of enforcing these guidelines. The division maintains a system to provide an accounting of software licenses purchased by the NRA.

NRA employees may not duplicate any licensed software of related documentation for use either on the NRA's premises or elsewhere unless the NRA is expressly authorized to do so by the agreement with the licenser. Unauthorized duplication of software may result in disciplinary action being taken against the employee. Employees may not give software to any outsiders including members, contractors, and others.

Software Acquisition/Installation

- All PC software acquired by the NRA must be processed through the Information Services Division.
 Software acquisition channels are restricted to ensure that the NRA has an accurate record of software purchased for NRA computers and can register, support and upgrade such software accordingly.
- 2. Information Services personnel must install all software. Once the software is installed, the original installation media will be stored in the Information Services Division.
- 3. Downloading software from the Internet violates both the rules of acquisition and installation stated in #1 and #2 above.

Software Audits

The Information Services Division conducts periodic software audits of all NRA software

Software Use

NRA computers are organization assets and must be kept software legal and virus free. Only software purchased through the above procedures may be used on the NRA's PCs. Employees are not permitted to bring software from home and load it onto NRA computers. Generally, software purchased by the NRA for use on NRA computers may not be taken home and used on home computers. Some software companies permit the use of software in the office and at home. Employees must check with the Information Services Division.

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Software Use Management

Software use will be managed to:

- Provide all employees with relevant, adequate, and legal copies of software necessary to perform their duties
- Protect the integrity of the NRA's computer environment from copyright infringement by adhering to U.S. Copyright Law
- Procure, install, record, and follow procedures and controls for each piece of software
- Protect the integrity of the NRA's computer environment from viruses.

Violations

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Any employee who violates this policy will be subject to discipline up to and including the possibility of termination and/or legal action if warranted.

NRA

SUBJECT: EMAIL AND INTERNET ACCESS EFFECTIVE: 02/01/11 PAGE NO.: C-1.47: 1 of 2

Email Policy

The NRA provides internal, electronic messaging (email) for legitimate company related activities for all NRA staff members. The system is intended to give employees a tool that promotes rapid communications in the conduct of business within the NRA.

Internet or on-line mail access may be provided for employees with a legitimate business need who have authorization from the director responsible for the division

Employees using the NRA email system will identify themselves honestly, accurately, and completely (including company affiliation and function as requested).

All messages and attachments either sent or received through the NRA's Network are the property of the NRA and the NRA reserves the right to review and disclose all messages.

Internet Access Policy

All NRA employees have access to official NRA Websites. For access beyond official NRA Websites, a business need and proper authorization through the NRA Officer responsible for the area in which the employee works is required.

The NRA may monitor and record any and all Internet usage it deems necessary.

Inappropriate Use

Employees may not use the NRA email facilities or Internet access to:

- Disable or overload any computer system or network, or to circumvent any system intended to protect the privacy or security of another user.
- Propagate any virus, worm, Trojan horse, or trap door program code.
- Solicit or performs work for outside commercial ventures, religious or political causes, or other non-NRA business related solicitations including lotteries and raffles.
- Send offensive, harassing or disruptive messages or browse offensive or disruptive Websites that contain sexual implications, obscene or offensive language or images, racial slurs, gender specific comments (including sexually explicit images or documents), or any other comments that would offend someone on the basis of religious beliefs, gender, race, age, national origin or disability. Such offensive or disruptive material may not be displayed, archived, stored, distributed, edited or recorded using the NRA network or computing resources.
- Send or receive intellectual property, trademarks or copyrighted material of any kind, trade secrets, proprietary financial information, membership lists, or similar material.
- Send or receive attachments greater than 4 megabytes.
- Receive, download or install non NRA business related information or programs outside the designation
 of your job description. (Refer to Transmitting Confidential Information)

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Mailbox Maintenance

Users are responsible for the content and maintenance of their electronic mailboxes and should:

Check mail daily

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- Delete wanted messages regularly to maintain only a minimum number of messages at any one time
- Keep messages in your electronic mailbox for no longer than 60 days, and
- Never send or keep anything you should not want to see on the front page of a newspaper

Transmitting Confidential Information

Confidential information should not be transmitted via email unless the information has been encrypted and been approved by two NRA officers. Salary information, personal information, financial data, and membership lists are examples of confidential information.

Bulletin Boards

Internal bulletin boards are available for setup by division or program group. Human Resources division will monitor the NRA Bulletin Board, a service for employees who wish to advertise their own items for sale or purchase. Advertising items for individuals, businesses or other entities outside of the NRA Staff is strictly prohibited

Violations

Any employee who violates this policy or uses the NRA network for improper purposes will be subject to discipline up to an including termination and/or legal action if warranted

Transmitting Confidential Information

Confidential information should not be transmitted via email unless the information has been encrypted and has the approval of two (2) NRA officers. Salary information, personnel information, financial data, and membership lists, are examples of confidential information

NYSCEF DOC. NO. 1304 RECEIVED NYSCEF: 03/06/2023

NRA

SUBJECT: IS SERVICE CENTER EFFECTIVE: 02/01/11 PAGE NO.: C-1.48

Service Center Policy

The IS Service Center acts as a central point of contact for all technical support including

- Hardware and software questions
- Consulting
- Installations
- Networking
- Network connection requests, and
- Troubleshooting

Staff may submit requests online, by sending email to <u>Helpdesk@nrahq.org</u> or by submitting a work order. The IS Service Center can be reached at ext. 1555.

Software Support

The IS Service Center provides basic software maintenance level support for NRA Office automation, and Internet Access software packages.

Maintenance level software support includes:

- Basic problems solving and
- Simple procedural walk through.

The IS Service Center maintains a frequently asked questions section on the NRA Connection. Software training is a division responsibility; therefore training and 'how to' support is not provided.

NRA

SUBJECT: MOBILE DEVICES EFFECTIVE: 02/01/11 PAGE NO.: C-1.49: 1 of 2

Mobile Device Policy

All users of mobile devices must take measures to guard against the exposure of critical information due to:

- Lost or stolen devices
- Viruses
- Unencrypted transmission

All laptops using external network connectivity must have up to date anti-virus software on the system.

- Laptops must be brought to the IS Service Center to have the anti-virus software updated manually.
- Laptops using Internet connections outside of the NRA network must be virus scanned in the Service Center prior to being re-connected to the NRA Network.
- Most public wireless fidelity (Wi-Fi) hotspots do not offer any encryption and must not be used for sensitive information transmission.

Portable data storage devices such as USB Thumb drives and the like must be acquired through the Information Services Division. The data stored on portable data storage devices must be encrypted. Some camera media and some non-Blackberry smart phone may not be encryptable. It is therefore the employee's responsibility to take measures to protect NRA data.

Under no circumstances are mobile and/or handheld devices to be used while operating a vehicle.

Non-exempt staff is prohibited from using mobile devices to perform NRA business during non-working hours.

Requirements

Protecting the Data

It is the employee's responsibility to protect the data on mobile devices. Following these suggestions will help protect NRA data against unauthorized access.

- Protect the data by setting up the device with a user id and password as per the device requirements.
- Ensure the physical security of the device by protecting the machine and the information it contains.
 - 1. To the best of your ability, always keep your mobile devices in your possession.
 - 2. Contact the IS Service Center immediately—703-267-1555—if a mobile device is lost or stolen.

Securing Data Transmission

Encryption of NRA information is important whether you are using a wireless Internet connection or accessing the NRA Network remotely via the Internet.

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If it is necessary to use a Wireless Access Point (WAP), contact the IS Service Center for information

regarding wireless configurations.

Computers must be configured with a Virtual Private Network (VPN) client to access the NRA Network remotely via the Internet. Only division directors may authorize remote access to the NRA network.

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Any	employ	ee who	o violates	this	policy	will be	e subject	to	discipline	up to	and	including	the	possibili	ty o	f
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NRA

	SUBJECT:	TELECOMMUNICATIONS	EFFECTIVE:	02/01/11
l			PAGE NO.:	C-1.50

Telecommunications provides coordination of all telephone related activities, performing most required work utilizing Telecom staff. Assistance with telephone and voicemail training, trouble reporting, and requests for changes and installations can be coordinated through the Telecommunication's Help Desk. Telecommunications also coordinates and publishes the *NRA In-House Telephone Directory* and is responsible for the maintenance, printing and distribution of the monthly telephone call record reports. Staff is required to forward all changes in employee names, titles, and departments to Telecommunications for updates to the directory and to the call record database. Telecommunications is responsible for answering the NRA's main business lines at (703) 267-1000 including some in-bound toll free numbers.

The following specific items should be directed to the Telecommunciation's Help Desk:

- D All extension and office changes for employees (Human Resources will notify Telecomm of any name or title changes).
- D Requests for moves of telephones to different outlets. It is important that your telephone not be unplugged or moved by employees. Unplugging telephones can result in service problems.
- D Requests for changes in extension number assignments and telephone equipment.
- D Requests for fax phone lines and modem lines (Telecommunications provides "dial tone" and phone numbers; equipment and software must be provided by the requesting department).
- D All questions about local and long distance service, 800 service, phone features, voicemail and all trouble reporting.
- D Requests for copies of the *NRA In-House Telephone Directory*, voicemail and telephone training guides. The *NRA In-House Telephone Directory* is also available on-line in the NRA Connection under the phone directory area.

Telecommunications also coordinates the following services:

- D Information about and requests for all tele-conference services.
- D Issuing of corporate NRA telephone charge cards. Requests should be forwarded to the Manager of Telecommunications via a memo signed by the Division Director.
- D Information on all cellular phone services for employees.
- D Requests for 800 service, installation and billing.

Telecommunications typically responds to individual reports of telephone troubles within one to two hours, and request for moves, changes or installation in one to three business days. Training on phone features and voicemail for new employees can be provided on an individual basis by calling the Telecommunications Help Desk.

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NRA

SUBJECT:	VOICEMAIL	EFFECTIVE: 0	2/01/11
		PAGE NO.: C	C-1.51

Voicemail is a critical portion of the NRA's telephone system. Therefore, it is mandatory that employees refer to the Meridian Mail Voice Messaging User Guide prior to using the system. The guide can be found on-line in the **NRA Connection** under the phone directory area. Employees are required to record an external greeting. This greeting must be professional in manner and updated as needed (out of office, meetings, etc.) A personal verification must also be recorded. The verification identifies internal callers who have left a message.

The NRA's telephone system, including Voicemail, is the property of the NRA and the NRA may access and review any messages, data and records therein without notice to the employee.

Please contact the Telecommunications Help Desk with any questions.

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NRA

SUBJECT:	MULTIMEDIA/AUDIO VISUAL SERVICES	EFFECTIVE:	02/01/11
		PAGE NO.:	C-1.52

Multimedia/Audio Visual Services (MAVS) provides technical and supplementary multimedia and AV support and service to NRA staff for official NRA business. These services include:

- D Maintenance and logistical support for the Multi-Purpose and Executive Conference rooms multimedia systems.
- D Planning and execution of special events (on or off site) using sound, video, lighting, and projection systems.
- D Media duplication.
- D Consultation for purchasing of audio visual equipment and services.
- D Audio and video production, recording and editing.
- D Help with other audio visual equipment such as overheads, TV/VCR units, slide projectors, etc.

All requests are completed on a first come, first serve basis. Small projects are usually finished by the end of the next business day, while long-term productions can take months. All audio visual equipment must be reserved through MAVS. Please provide as much advanced notice as possible to insure adequate services and resources. Employees should not attempt to operate any equipment without proper training.

NYSCEF DOC. NO. 1304 RECEIVED NYSCEF: 03/06/2023

NRA

SUBJECT:	RECYCLINGPROGRAM	EFFECTIVE: 02/01/11
		PAGE NO.: C-1.53

The NRA participates in a desktop recycling program in which we are able to recycle a wide variety of paper materials without a great deal of sorting. In addition, paper clips, rubber bands, staples, tape, adhesive labels, plastic tabs, and plastic or wire spirals do not have to be removed. Each office, cubicle or work area is equipped with a small grey recycle can. These recycle cans are to be used for recyclable paper products only. Once the small recycle can is full, each employee is responsible for emptying it into the large grey recycle cans located in the workrooms or copier rooms in each division. The large bins are emptied by the night cleaning crew.

It is important to the program's success that staff place only acceptable items into the recycling bins and keep the bins free of unacceptable items.

RECYCLE THESE ACCEPTABLE ITEMS

PAPER: white, colored, computer, newspaper, coated, embossed, facsimile, blueprints, carbonless (NCR), copy, self adhesive and brown kraft bags.

ENVELOPES: regular, with windows, colored or coated.

MISCELLANEOUS: brochures, greeting cards, magazines, pamphlets, corrugated cardboard (any color), paperboard and posters.

TRASH THESE UNACCEPTABLE ITEMS

PAPER FOOD RECEPTACLES: paper plates, cups, napkins, cake boxes, pizza boxes, candy wrappers, lunch bags, and waxed paper.

MISCELLANEOUS: brown mailing envelopes and file folders (they can not be bleached, so therefore they can not be recycled), and carbon paper.

THE RECYCLING PROGRAM IS NOT OPTIONAL — IT IS REQUIRED BY FAIRFAX COUNTY.

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C7 – Safety and Security

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NRA

SUBJECT:	IDENTIFICATION AND ACCESS BADGES	EFFECTIVE:	02/01/11
		PAGE NO.:	C-1.54

All NRA employees, temporary employees, consultants and visitors are issued badges to be worn and used within NRA facilities. These badges serve two purposes: (1) to identify personnel and (2) to control building traffic by tailoring access needs to individuals.

Employee badges are issued by the Security Office on the employee's first day of work. New employees' divisions are required to send memoranda to the Security Office notifying it of a new employee's expected date of arrival and requesting specific access hours. If the Security Office is not in receipt of such memos, new employees will not be authorized access until this requirement is met.

Employees are expected to wear their badges in plain sight at all times while at work.

Badges are authorized according to the needs of individual employees. Therefore, it is important that employees use their own badges only. Badges are not to be borrowed or loaned to others. Employees who forget their badges may temporarily sign out a passcard from the Security Desk in the Lobby/North. Temporary passcards are to be turned in at the end of the work day.

If an employee's badge has been lost or stolen, the employee must take a memorandum from his or her division director to the Security Office containing the following information: what happened to the badge, the badge number, employee number and access hours approved. A new badge will be issued for a fee of \$15.00 (subject to change).

Individuals concluding their employment with the NRA are required to return their badges to a member of the Human Resources Division as part of their exit interview.

NYSCEF DOC. NO. 1304 RECEIVED NYSCEF: 03/06/2023

NRA

SUBJECT:	SECURITY	EFFECTIVE: 02/01/11
		PAGE NO.: C-1.55

The mission of the NRA Security Office is to provide a safe workplace for all personnel and visitors; to protect property and assets, both tangible and intangible; to discourage criminal activity and to encourage all employees to incorporate security into their lives by promoting security awareness.

The Security Office is responsible for controlling the facility access by issuing identification/access badges to all employees and tenants, authorizing issued badges for building access, issuing temporary badges to visitors and consultants, and handling all courier deliveries and pick-ups. Security personnel monitor the alarm system, manage emergency and evacuation situations, maintain a lost and found service, investigate allegations of impropriety and implement programs to enhance employees' security awareness.

In order to enhance employees' personal safety, Security personnel offer the following services: panic buttons located on fluorescent-marked columns in the parking garage which will summon assistance when activated, courtesy escorts from NRA buildings to vehicles parked on NRA lots, security conscious travel information, and tips on property identification. The NRA is not hereby agreeing to undertake any duty to assure safety to employees.

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NRA

SUBJECT:	EMERGENCY PROCEDURES	EFFECTIVE:	02/01/11
		PAGE NO.:	C-1.56

In the event of an emergency situation, alarms will ring throughout the building. Employees should immediately evacuate the NRA facility unless otherwise directed. Proper evacuation procedures are as follows:

- 1. When the emergency notification system is activated, all elevators will automatically return to the first floor. Employees are to evacuate the building by using the stairs <u>only</u>. Do not delay evacuation and endanger yourselves by waiting for an elevator.
- 2. Proceed down the stairwells quickly and orderly, taking care not to jostle others. Once in the lobby, continue to walk outside the building and wait at a distance of 500 feet.
- 3. Divisions should pick a meeting place once outside so all employees can be accounted for. Information on personnel left inside the building is helpful to Security and emergency personnel.
- 4. Security personnel will notify employees when the building has been cleared for re-entry. Do not attempt to enter the building until notified.
- 5. When re-entering the building, do so in an orderly fashion. Elevators will be working, but they may be operating slowly due to the number of people trying to use them. If possible, use the stairwells.

Throughout the year, the Administrative Services division will schedule emergency evacuation drills. When alarms are activated, employees are to follow the above procedures as if the emergency were real. The NRA Evacuation Plan for Headquarters employees and separate plans applicable to NRA-ILA employees located in Washington, D.C., and Sacramento, California are included in the Appendix section of the Handbook.

NYSCEF DOC. NO. 1304 RECEIVED NYSCEF: 03/06/2023

NRA

SUBJECT:	CHEMICAL/BIOLOGICAL/RADIATION HAZARD	EFFECTIVE:	02/01/11
		PAGE NO.:	C-1.57

When notified of a major catastrophe such as chemical, biological or radiation hazard which affects our immediate area, NRA Security Staff will secure all entrances to the building. Administrative Services personnel will also attempt to minimize air flow into the building by shutting down all air handling equipment and all elevators. It will then be ascertained from appropriate sources whether it is advisable to stay inside the building for a period of time or if it is safe to leave the building.

If it is recommended to stay inside the building for a period of time, each division will be notified. Each Division will also be advised as to the most appropriate place to assemble for the time NRA staff members are encouraged to stay indoors. It may be best for each division and tenant to have their employees go to an interior room such as a copy room or storage room. The Auditorium has been identified as a place to gather if it's advised to go to a low area of the building. Each floor warden will be notified of the recommended gathering places. In the event that staff is advised to gather in the basement areas, there will be instruction to do so via the stairwells as the elevators will not be in use.

All employees are expected to give full cooperation to NRA Staff and Building Management facilitating any emergency procedures. If an employee leaves the building against the recommendation of Security Staff, they assume all responsibility for such actions.

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NRA

SUBJECT:	REPORTING THREATS AND OTHER INCIDENTS	EFFECTIVE:	02/01/11
		PAGE NO.:	C-1.58

In order for the NRA Security Office to operate as effectively and efficiently as possible, employees are requested to report all observed incidents, threats or suspicious behavior to Security personnel as soon as possible.

Before filing a report with Security personnel, employees are encouraged to write down as much information about the incident as possible. For example, if a suspicious person was observed in the parking garage, employees should record the time they saw the person, where the person was located in the garage, and where the employee was when the suspicious person was viewed. Describe all contact with the individual, recalling as much dialogue if applicable. Make note of the person's appearance, including physical characteristics, clothing and anything he or she was carrying. All of this information will be useful in locating the person and ensuring his or her removal from the premises.

Security should be notified when any of the following situations occur: crimes are observed (i.e., something is stolen from an office or a car is vandalized in the parking lot), threats are received via e-mail, mail or phone, an undesirable visitor has informed an employee of an impending visit to NRA facilities (this does include situations in which employees are being stalked), or an employee is threatened by another employee or former employee, or if any person is threatened upon the NRA's premises.

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NRA

SUBJECT:	VISITORS	EFFECTIVE:	02/01/11
		PAGE NO.:	C-1.59

When employees are expecting a visitor to NRA headquarters, they are obligated to follow the procedures below to enable Security personnel to control access to the headquarters building and safeguard the personnel therein.

- 1. Please call the Security Receptionist (Lobby/North) or send a memorandum to same with the name of the visitor(s), date of visit, expected time of arrival and the NRA point of contact's extension number.
- When the visitor(s) arrives, the Security Receptionist will issue a temporary visitor badge to be worn at all times while in the headquarters building. The point of contact will then be contacted and informed of the visitor's arrival.
- 3. Employees are to retrieve their visitors from the lobby, escort them to their meeting and, at the conclusion of the meeting, escort them back to the lobby at which point they will return their temporary badge to the Security Receptionist. A visitor must be accompanied by an employee at all times while in the building.
- Visitors and guests of employees are permitted only during business hours unless authorized by the Division Director.

Employees may not bring children to their work areas and supervisors may not authorize visitations by children to the workplace for other than brief visits and/or officially sanctioned activities with the specific prior approval of the Officer in charge. The presence of children in the workplace creates significant safety and liability considerations for the NRA, as well as adversely affecting the work efficiency of the NRA Staff. Employees should refer to the discretionary policies on Flextime and Annual Leave for further information regarding scheduling to meet child care responsibilities and other needs.

Pets are prohibited on NRA premises except in such cases where the Officer in charge has given specific prior approval or animals are needed to facilitate daily functioning of the employee as defined under the ADA.

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SUBJECT:	LOST AND FOUND	EFFECTIVE:	02/01/11
		PAGE NO.:	C-1.60

The Security Office maintains a Lost and Found service. Employees who lose or find items shall fill out a lost and found report at the NRA Security office (2nd Floor/North) or to the Front Desk (1st Floor/North).

Recovered items are stored in the NRA Security office for a period of 90 days. After 90 days, articles that remain unclaimed will be discarded.

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C8 – Statutory Benefits

NYSCEF DOC. NO. 1304 RECEIVED NYSCEF: 03/06/2023

NRA

SUBJECT: OCCUPATIONAL SAFETY AND HEALTH

EFFECTIVE: 02/01/11
PAGE NO.: C-1.61

The NRA makes every attempt to ensure that work areas are free of occupational hazards and conform to established standards of worker health and safety.

The Human Resources Division maintains all records required by the Occupational Safety and Health Administration (OSHA). All workplace accidents, illnesses, or concerns about workplace safety and health must be reported immediately to the Human Resources Division.

Employees who incur accidental injuries or illnesses as a result of their NRA employment will be eligible to apply for benefits under Workers' Compensation.

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NRA

SUBJECT: WORKERS'COMPENSATION EFFECTIVE: 02/01/11
PAGE NO.: C-1.62: 1 of 2

The NRA provides for the required Workers' Compensation insurance for all employees in accordance with the regulations of the state and territory in which they work. The cost of this coverage is paid by the NRA. Eligibility for and the amount of benefits paid vary according to the state in which the employee works.

Workers' Compensation benefits, if approved, are payable for accidental injuries or illnesses incurred as a result of employment with the NRA. These benefits may include:

Disability income for the period of time you are unable to work (after the applicable waiting period);

Payment of medical expenses if you require medical treatment;

Death benefit.

Reporting Work-related Injuries and Accidents

All work-related injuries must be reported to your supervisor, NRA Security and the Human Resources Division within 24 hours of the accident. Work-related illnesses must be reported to your supervisor, NRA Security and the Human Resources Division as soon as you become aware of the condition. Employees on Workers' Compensation must provide the Human Resources Division information on their medical status on a weekly basis.

Employment Status While on Leave

Employees on Workers' Compensation may utilize earned annual, sick, and compensatory leave to make up the difference between their Workers' Compensation benefits and their NRA salaries. Employees without accrued sick, annual and compensatory leave are not eligible for salary differential.

Employees on approved worker's compensation leave can continue health coverages (with the exception of AD&D coverage) through the NRA Employee Cafeteria Plan for six months under the terms, conditions, and limitations of the applicable plan and except if prohibited by law, **provided all premiums are paid by the employee each month and the worker's compensation insurance carrier deems the person disabled.** The NRA will continue to make contributions towards the insurance premium on the same basis provided to active employees. Injured employees must continue to pay their share of health coverage premiums each month. If an injured employee elected to make premium contributions on a pre-tax basis, he/she may continue to do so provided he/she is receiving sufficient salary differential from the NRA. If not, the premium contributions will be made on an after-tax basis by the injured employee submitting payment directly to the NRA each month. Payment must be received in the Human Resources Division by the last day of each month being covered. Failure to provide timely payments (more than 30 days late) will result in health care coverage being terminated for the remainder of their leave. The NRA will provide written notice at least 15 days in advance that coverage will cease as of the last satisfied premium payment date. Health coverage will be reinstated the first day the employee returns to regular full duty.

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COBRA will become available to the injured employee when coverage is terminated. If the injured employee is still on approved Worker's Compensation leave, the NRA will supplement the COBRA premium for the first six months, unless coverage termination reason was for failure to pay premiums. The amount will be on the same basis provided to active employees. The COBRA participant will be responsible for the remainder of the monthly insurance premium. After the first six months of COBRA coverage, the participant will be responsible for the full monthly insurance premium.

The NRA reserves the right to fill the position of the injured worker and terminate employment if they cannot return to work after 12 weeks of leave (this is considered the eligible amount under FMLA). Ability to return to work will require at least 30 days advance (but not less than two weeks) notice to the NRA, whenever feasible. If the position they held has been filled, the placement in a position in the NRA will be made on the basis of availability and suitability.

If the injured employee has a covered disability under the Americans with Disability Act, additional leave as a reasonable accommodation beyond 12 weeks may be granted. A determination for additional leave is made on a case by case basis.

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NRA

SUBJECT:	COBRA CONTINUATION	EFFECTIVE: 02/01/11
		PAGE NO.: C-1.63: 1 of 3

General Notice of COBRA Continuation Coverage Rights

Introduction

This notice contains important information about your rights to COBRA continuation coverage, which is a temporary extension of coverage under the Plan. This notice generally explains COBRA continuation coverage, when it may become available to you and your family, and what you need to do to protect the right to receive it.

The right to COBRA continuation coverage was created by a federal law, the Consolidated Omnibus Budget Reconciliation Act of 1985 (COBRA). COBRA continuation coverage can become available to you when you would otherwise lose your group health coverage. It can also become available to other members of your family who are covered under the Plan when they would otherwise lose their group health coverage. For additional information about your rights and obligations under the Plan and under federal law, you should review the Plan's Summary Plan Description or contact the Plan Administrator.

What is COBRA Continuation Coverage?

COBRA continuation coverage is a continuation of Plan coverage when coverage would otherwise end because of a life event known as a "qualifying event." Specific qualifying events are listed later in this notice. After a qualifying event, COBRA continuation coverage must be offered to each person who is a "qualified beneficiary." You, your spouse, and your dependent children could become qualified beneficiaries if coverage under the Plan is lost because of the qualifying event. Under the Plan, qualified beneficiaries who elect COBRA continuation coverage must pay for COBRA continuation coverage.

If you are an employee, you will become a qualified beneficiary if you lose your coverage under the Plan because either one of the following qualifying events happens:

- · Your hours of employment are reduced, or
- Your employment ends for any reason other than your gross misconduct.

If you are the spouse of an employee, you will become a qualified beneficiary if you lose your coverage under the Plan because any of the following qualifying events happens:

- Your spouse dies;
- · Your spouse's hours of employment are reduced;
- Your spouse's employment ends for any reason other than his or her gross misconduct;
- Your spouse becomes entitled to Medicare benefits (under Part A, Part B, or both); or
- You become divorced or legally separated from your spouse.

Your dependent children will become qualified beneficiaries if they lose coverage under the Plan because any of the following qualifying events happens:

- The parent-employee dies;
- The parent-employee's hours of employment are reduced;
- The parent-employee's employment ends for any reason other than his or her gross misconduct;
- The parent-employee becomes entitled to Medicare benefits (Part A, Part B, or both);
- · The parents become divorced or legally separated; or
- The child stops being eligible for coverage under the plan as a "dependent child".

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When is COBRA Coverage Available?

The Plan will offer COBRA continuation coverage to qualified beneficiaries only after the Plan Administrator has been notified that a qualifying event has occurred. When the qualifying event is the end of employment or reduction of hours of employment, death of the employee, or the employee's becoming entitled to Medicare benefits (under Part A, Part B, or both), the employer must notify the Plan Administrator of the qualifying event.

You Must Give Notice of Some Qualifying Events

For the other qualifying events (divorce or legal separation of the employee or spouse or a dependent child's losing eligibility for coverage as a dependent child), you must notify the Plan Administrator within 60 days after the qualifying event occurs. You must provide this notice to: National Rifle Association, Attn: Benefit Manager/ Human Resources, 11250 Waples Mill Road Fairfax, VA 22030. The notice must include the type of qualifying event and the effective date of such event.

How is COBRA Coverage Provided?

Once the Plan Administrator receives notice that a qualifying event has occurred, COBRA continuation coverage will be offered to each of the qualified beneficiaries. Each qualified beneficiary will have an independent right to elect COBRA continuation coverage. Covered employees may elect COBRA continuation coverage on behalf of their spouses, and parents may elect COBRA continuation coverage on behalf of their children. COBRA continuation coverage is a temporary continuation of coverage. When the qualifying event is the death of the employee, the employee's becoming entitled to Medicare benefits (under Part A, Part B, or both), your divorce or legal separation, or a dependent child's losing eligibility as a dependent child, COBRA continuation coverage lasts for up to a total of 36 months. When the qualifying event is the end of employment or reduction of the employee's hours of employment, and the employee became entitled to Medicare benefits less than 18 months before the qualifying event, COBRA continuation coverage for qualified beneficiaries other than the employee lasts until 36 months after the date of Medicare entitlement. For example, if a covered employee becomes entitled to Medicare 8 months before the date on which his employment terminates, COBRA continuation coverage for his spouse and children can last up to 36 months after the date of Medicare entitlement, which is equal to 28 months after the date of the qualifying event (36 months minus 8 months). Otherwise, when the qualifying event is the end of employment or reduction of the employee's hours of employment, COBRA continuation coverage generally lasts for only up to a total of 18 months. There are two ways in which this 18 month period of COBRA continuation coverage can be extended.

Disability extension of 18 month period of continuation coverage:

If you or anyone in your family covered under the Plan is determined by the Social Security Administration to be disabled and you notify the Plan Administrator in a timely fashion, you and your entire family may be entitled to receive up to an additional 11 months of COBRA continuation coverage, for a total maximum of 29 months. The disability would have to have started at some time before the 60th day of COBRA continuation coverage and must last at least until the end of the 18 month period of continuation coverage. You must provide notice of disability to: National Rifle Association, Attn: Benefit Manager/ Human Resources, 11250 Waples Mill Road Fairfax, VA 22030.

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Second qualifying event extension of 18 month period of continuation coverage:

If your family experiences another qualifying event while receiving 18 months of COBRA continuation coverage, the spouse and dependent children in your family can get up to 18 additional months of COBRA continuation coverage, for a maximum of 36 months, if notice of the second qualifying event is properly given to the Plan. This extension may be available to the spouse and any dependent children receiving continuation coverage if the employee or former employee dies, becomes entitled to Medicare benefits (under Part A, Part B, or both), or gets divorced or legally separated, or if the dependent child stops being eligible under the Plan as a dependent child, but only if the event would have caused the spouse or dependent child to lose coverage under the Plan had the first qualifying event not occurred.

If You Have Questions

Questions concerning your Plan or your COBRA continuation coverage rights should be addressed to the contact or contacts identified below. For more information about your rights under ERISA, including COBRA, the Health Insurance Portability and Accountability Act (HIPAA), and other laws affecting group health plans, contact the nearest Regional or District Office of the U.S. Department of Labor's Employee Benefits Security Administration (EBSA) in your area or visit the EBSA website at www.dol.gov/ebsa. (Addresses and phone numbers of Regional and District EBSA Offices are available through EBSA's website.)

Keep Your Plan Informed of Address Changes

In order to protect your family's rights, you should keep the Plan Administrator informed of any changes in the addresses of family members. You should also keep a copy, for your records, of any notices you send to the Plan Administrator.

Plan Contact Information

Benefits Manager/Human Resources Division National Rifle Association 11250 Waples Mill Road Fairfax, Virginia 22030 703-267-1263

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C9 – Leaving the NRA

NYSCEF DOC. NO. 1304 RECEIVED NYSCEF: 03/06/2023

NRA

SUBJECT:	TERMINATION OF EMPLOYMENT	EFFECTIVE:	02/01/11
		PAGE NO.:	C-1.64

Employment at the NRA is by mutual consent. Therefore, termination of employment can be originated by either the employee or the NRA.

Employees who elect to resign their employment are asked to provide the NRA with at least two weeks written notice and to assist in effecting a smooth transition of their workload. Employees who elect to retire are asked to provide the NRA with at least three months notice.

An exit interview will be scheduled by the Human Resources Division on or before the last day of employment. Matters such as final pay, vacation pay, COBRA (health insurance continuation), and retirement benefits will be discussed. The employee must turn in all Association keys, identification cards (including their employee picture badge), credit cards, equipment, software, and private or proprietary documents, including the Employee Handbook.

For the purpose of calculating pay and benefits, the last day of employment is considered the last full day when work was performed by the exiting employee. Leave such as sick, annual or compensatory do not count toward final day calculations.

Employees are encouraged to discuss why they are leaving the NRA, to make constructive suggestions for changes to policies, procedures, practices, and benefits, and to provide other feedback that could assist management in strengthening NRA operations.

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NRA			
SUBJECT:	RETIREMENT	EFFECTIVE: PAGE NO.:	02/01/11 C-1.65
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The NRA encourages employees to work for as long as they would like, provided their work is satisfactory.

Employees are requested to give their Division Director three months' notice of their intent to retire. This notice is designed to provide the NRA the opportunity to implement a smooth transition and succession. In order to initiate pension calculations and ensure prompt pension payments when they retire, employees should contact the Benefits Manager in the Human Resources Services Division at least **three months prior** to their intended retirement date.

All employee benefits terminate at retirement. Continuation of health, dental and health care spending account coverage is available through COBRA for all qualified beneficiaries.

Employees going directly from active employee status to retirement, who are eligible to immediately begin receiving their retirement payments may choose to use their Retiree Bank Hours account to continue their health insurance, provided they are not already eligible for Medicare. The Retiree Bank Hours program began in 1986 and is a calculated account for each employee. The account consists of:

- Yearly calculations of excess unused, accrued annual, sick and/or compensatory leave hours (over 225 hours of the combined total)
- Excess leave hours are converted into a dollar value
- The dollar value = Excess hours X rate of pay.

Annually, the account balance may fluctuate (rise or fall) based on the individual's leave bank total at the end of the year being reviewed. A total dollar value is determined at retirement which includes values calculated from 1986 through the employee's last day of employment. This dollar amount may then be used to purchase health insurance for the retiree and their spouse, if eligible. There is no cash-out option for this benefit, nor is it available to employees for any reason other than retirement. This funded health coverage will cease when the employee is eligible for Medicare or the dollar amount is exhausted, whichever occurs first. COBRA will become available to all qualified beneficiaries at that time.

Employees going directly from active employee status to retirement and are eligible to immediately begin receiving their retirement payments are also provided with reduced life insurance at the expense of the NRA.

The Human Resources Division can answer your retirement questions.

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SUBJECT: RE-EMPLOYMENT **EFFECTIVE: 02/01/11** PAGE NO.: C-1.66

Former employees may be considered for re-employment provided they meet the requirements of the position for which they apply and had a previous satisfactory employment record.

A former employee who is re-employed will be considered a new employee from the date of re-employment unless the break in service is less than thirty days, in which case the employee will retain accumulated seniority. Length and/or continuity of service for the purposes of the NRA benefit plans, such as health, pension, and life insurance, are governed by the terms of each benefit plan.

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NRA

SUBJECT: VETERANS'RE-EMPLOYMENT EFFECTIVE: 02/01/11 PAGE NO.: C-1.67

Following applicable case law, federal and state statutes, the NRA gives certain returning veterans rights to reemployment.

Employees who leave the NRA to engage in active military service will be entitled to re-employment rights if they meet certain requirements. These include, but not limited to, receiving an honorable discharge and applying for re-employment within 90 days after separation from active duty. However, re-employment will not be required if the circumstances of the NRA have changed making it impossible or unreasonable to re-employ the veterans. Questions regarding veterans' re-employment should be directed to the Human Resources Division.

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SECTION D

NRA SERVICES

D1 – Insurance Benefits

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NRA

SUBJECT:	INSURANCE OVERVIEW	EFFECTIVE:	02/01/11
		PAGE NO.:	D-1.01

The NRA provides full- and regular part-time (regularly work at least 30 hours per week) employees with a broad spectrum of insurance coverage options. This insurance program is called the **NRA Employee**Cafeteria Plan. It includes a medical plan, a dental plan, three dependent coverage options, life insurance, accidental death and dismemberment (AD&D) insurance, short-term disability, long-term disability income insurance, the ability to pay medical and dental premiums on a pre-tax basis, health care expense and dependent care flexible reimbursement accounts funded on a pre-tax basis, and optional supplemental life insurance for the employee.

An overview of each type of insurance coverage follows. Complete descriptions of the insurance provisions are included in the Certificate Booklets and Summary Plan Descriptions, which are distributed at the time of enrollment and/or at the time a new benefit is implemented or revised. The actual insurance policies are available for review in the Human Resources Division. Any discrepancies that arise between the overview and the Summary Plan Descriptions or actual insurance policies will be decided in favor of the written plan documents and insurance policies.

Benefits are not a guarantee of employment, nor are all benefits guaranteed to be continued for the duration of employment.

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NRA

SUBJECT: MEDICALINSURANCE EFFECTIVE: 02/01/11
PAGE NO.: D-1.02: 1 of 2

The NRA offers Full-time, and Regular Part-Time (regularly work at least 30 hours per week) employees medical insurance through the NRA Employee Cafeteria Plan. Employees must enroll annually to receive medical coverage for themselves and dependents. Dependent coverage is available in three different levels. Premium contributions may be made on a pre-tax basis.

ELIGIBILITY

All Full-time and Regular Part-time employees who have completed 30 calendar days of service are eligible to participate in the NRA Employee Cafeteria Plan, including medical insurance. Employees' dependents are eligible to participate in the medical plan if they are:

a spouse, your child(ren)

Children are defined as natural children, stepchildren, a natural child of your covered child, adopted children, foster children and a child who is recognized under a medical child support order as having a right to enrollment under the Plan. Dependent children are covered to age 26 as defined under current law. Disabled or handicapped children who live with and are dependent on the employee for support are eligible without any limiting age, if approved by the insurance carrier.

EFFECTIVE DATE OF COVERAGE

Coverage begins on the first day following completion of 30 calendar days of service with the NRA.

PLAN DESCRIPTIONS

Details of insurance plans are given in the NRA Employee Cafeteria Plan Enrollment Guide, the Certificate Booklet, and the actual insurance policies maintained in the Human Resources Division.

Employees electing coverage will be required to contribute toward premium costs. The employee premium cost is structured under a salary-based contribution schedule. Employees can select dependent coverage based on their family needs:

employee plus child(ren); employee plus spouse; or employee and family.

ENROLLMENT

To enroll, employees must complete and submit an election form to the Human Resources Division within 30 days of their eligibility date.

It is each employee's responsibility to complete and submit his/her election form. Employees failing to submit an election form will not receive medical coverage for that Plan Year. The Benefits Manager in the Human Resources Division will answer insurance-related questions.

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Your elections are irrevocable for the Plan Year unless you have a "Family Status Change". Family status changes include, but not limited to, the following events:

- 1. Events that change your legal marital status, including marriage, death of your spouse, divorce, legal separation, and annulment;
- 2. Events that change your number of dependents, including birth, death, adoption of a child, placement for adoption of a child, and/or events that cause your dependent to satisfy or cease to satisfy eligibility requirements for coverage on account of attainment of age, student status, or any similar circumstance;
- 3. Any event that changes your employment status or the employment status of your spouse, or dependent, such as a termination or commencement of employment, a strike or lockout, a commencement of or return from an unpaid leave of absence, and a change in work location;
- 4. A change of your residence, or your spouse's or other dependent's change in residence; or
- 5. Any other event that the NRA determines will permit a change or revocation of an election during a Plan Year under regulations and rulings of the Internal Revenue Service.

The Human Resources Division must be notified within 30 days of the "Family Status Change". Changes to current coverage will not be granted past 30 days of the actual "Family Status Change". Prior to each Plan Year during "Open Enrollment", you will have the opportunity to select coverage from the options available for the upcoming Plan Year.

COBRA CONTINUATION

NYSCEF DOC. NO. 1304

Group medical benefits may be continued under certain circumstances in compliance with the Consolidated Omnibus Budget Reconciliation Act of 1986 (COBRA). For more information, refer to the COBRA Continuation policy in the handbook.

The summary plan description and insurance policies for each medical plan is provided to employees when coverage is elected. This policy is not intended to be a full and complete description of all of the provisions of the Plan. Insurance benefits are subjected to the conditions contained in the then current insurance policy in effect when a claim arises. There are special conditions, exclusions and limitations to such policies. Furthermore, NRA and the insurance companies specifically reserve the right to alter or change any terms in the insurance policies; including, but not limited to, reductions in the amount of coverage, the addition of further conditions, exclusions and/or limitations, and the cancellation or nonrenewal of such insurance policies.

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NRA

SUBJECT: DENTAL INSURANCE EFFECTIVE: 02/01/11
PAGE NO.: D-1.03: 1 of 2

The NRA offers Full-time and Regular Part-Time (regularly work at least 30 hours per week) employees dental insurance through the NRA Employee Cafeteria Plan. Employees must enroll annually to receive dental coverage for themselves and dependents. Dependent coverage is available in three different levels. Premium contributions may be made on a pre-tax basis.

ELIGIBILITY

All Full-time and Regular Part-time employees who have completed 30 calendar days of service are eligible to participate in the NRA Employee Cafeteria Plan, including dental insurance. Employees' dependents are eligible to participate in the dental plan if they are:

a spouse, your child(ren)

Children are defined as natural children, stepchildren, a natural child of your covered child, adopted children, foster children and a child who is recognized under a medical child support order as having a right to enrollment under the Plan. Dependent children are covered to age 26 as defined under current law. Disabled or handicapped children who live with and are dependent on the employee for support are eligible without any limiting age, if approved by the insurance carrier.

EFFECTIVE DATE OF COVERAGE

Coverage begins on the first day following completion of 30 calendar days of service with the NRA.

PLAN DESCRIPTION

The NRA offers dental insurance to its employees and their dependents. Details of insurance plans are given in the NRA Employee Cafeteria Plan Enrollment Guide, the Certificate Booklet, and the actual insurance policies maintained in the Human Resources Division.

Employees electing coverage will be required to contribute toward premium costs. The employee premium cost is structured under a salary-based contribution schedule. Employees can select dependent coverage based on their family needs:

employee plus child(ren); employee plus spouse; or employee and family.

ENROLLMENT

To enroll, employees must complete and submit an election form to the Human Resources Division within 30 days of their eligibility date.

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It is each employee's responsibility to complete and submit his/her election form. Employees failing to submit an election form will not receive dental coverage for that Plan Year. The Benefits Manager in the Human Resources Division will answer insurance-related questions.

Your elections are irrevocable for the Plan Year unless you have a "Family Status Change". Family status changes include, but not limited to, the following events:

- 1. Events that change your legal marital status, including marriage, death of your spouse, divorce, legal separation, and annulment;
- 2. Events that change your number of dependents, including birth, death, adoption of a child, placement for adoption of a child, and/or events that cause your dependent to satisfy or cease to satisfy eligibility requirements for coverage on account of attainment of age, student status, or any similar circumstance;
- 3. Any event that changes your employment status or the employment status of your spouse, or dependent, such as a termination or commencement of employment, a strike or lockout, a commencement of or return from an unpaid leave of absence, and a change in work location;
- 4. A change of your residence, or your spouse's or other dependent's change in residence; or
- 5. Any other event that the NRA determines will permit a change or revocation of an election during a Plan Year under regulations and rulings of the Internal Revenue Service.

The Human Resources Division must be notified within 30 days of the "Family Status Change". Changes to current coverage will not be granted past 30 days of the actual "Family Status Change". Prior to each Plan Year during "Open Enrollment", you will have the opportunity to select coverage from the options available for the upcoming Plan Year.

COBRA CONTINUATION

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Group dental benefits may be continued under certain circumstances in compliance with the Consolidated Omnibus Budget Reconciliation Act of 1986 (COBRA). For more information, refer to the COBRA Continuation policy in the handbook.

The summary plan description and insurance policy is provided to employees when coverage is elected. This policy is not intended to be a full and complete description of all of the provisions of the Plan. **Insurance** benefits are subjected to the conditions contained in the then current insurance policy in effect when a claim arises. There are special conditions, exclusions and limitations to such policies, Furthermore, NRA and the insurance companies specifically reserve the right to alter or change any terms in the insurance policies; including, but not limited to, reductions in the amount of coverage, the addition of further conditions, exclusions and/or limitations, and the cancellation or non-renewal of such insurance policies.

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NRA

SUBJECT:	FLEXIBLE SPENDING ACCOUNTS	EFFECTIVE: 02/01/11
		PAGE NO.: D-1.04: 1 of 3

The NRA offers Full-Time and Regular Part-Time (regularly work at least 30 hours per week) employees the opportunity to participate in a flexible spending account through the NRA Employee Cafeteria Plan.

ELIGIBILITY

All Full-time and Regular Part-time employees who have completed 30 calendar days of service are eligible to participate.

EFFECTIVE DATE OF COVERAGE

Coverage begins on the first day following completion of 30 calendar days of service with the NRA.

TYPES OF FLEXIBLE SPENDING ACCOUNTS

These accounts are funded by your own pre-tax salary reduction contributions. When you initially enroll for coverage and prior to the beginning of each Plan Year (January 1 - December 31), you will have an opportunity to designate an annual amount of your salary, up to the allowable limits for each account. The contributions you make to your flexible spending account(s) will directly reduce your annual gross taxable income, thus reducing some or all of your payroll taxes.

HEALTH CARE FLEXIBLE SPENDING ACCOUNT

You may contribute up to the allowable limit per calendar plan year.

Eligible expenses include any health care expenses (medical and dental) allowed under Section 213 of the Internal Revenue Service (IRS) Code to the extent that they are not eligible and not paid under any other medical or dental benefit plans.

Allowable Expenses

Eligible expenses include co-insurance, deductibles, and amounts that exceed Plan limits for covered expenses.

Alisting of allowable expenses is provided by the Human Resources Division.

Expenses must be incurred while a participant is in the Health Care Flexible Spending Account during the Plan Year either as an employee or COBRA participant. Participation in the Health Care Flexible Spending Account can be extended upon termination of employment via COBRA. Under these circumstances, participation is on an after tax basis.

DEPENDENT CARE FLEXIBLE SPENDING ACCOUNT

You may contribute up to \$5,000 per calendar plan year (\$2,500 for married persons filing separate returns).

Eligible expenses include any expenses incurred for Dependent Care allowed under Section 129 of the IRS Code.

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Eligible Dependents:

A dependent child under age 13 for whom the participant is entitled to a tax deduction;

A dependent child of any age who is physically or mentally incapable of caring for him/herself;

A spouse, if the spouse is physically or mentally incapable of caring for him/herself; or

Any dependent who is physically or mentally incapable of caring for him/herself for whom the participant is entitled to a tax deduction.

Allowable Expenses

A list of the allowable expenses is provided by the Human Resources Division.

Expenses must be incurred while employed and participating in the Dependent Care Flexible Spending Account during the Plan Year. Participation in the Dependent Care Flexible Spending Account cannot be extended via COBRA.

ENROLLMENT

To enroll, employees must complete and submit an election form to the Human Resources Division within 30 days of their eligibility date. It is each employee's responsibility to complete and submit his/her election form. Employees failing to submit an election form will not be enrolled in any flexible spending account for that Plan Year. The Benefits Manager in the Human Resources Division will answer insurancerelated questions.

Your elections are irrevocable for the Plan Year unless you have a "Family Status Change". Family status changes include the following events:

- 1. Events that change your legal marital status, including marriage, death of your spouse, divorce, legal separation, and annulment;
- 2. Events that change your number of dependents, including birth, death, adoption of a child, placement for adoption of a child, and/or events that cause your dependent to satisfy or cease to satisfy eligibility requirements for coverage on account of attainment of age, student status, or any similar circumstance;
- 3. Any event that changes your employment status or the employment status of your spouse, or dependent, such as a termination or commencement of employment, a strike or lockout, a commencement of or return from an unpaid leave of absence, and a change in work location;
- 4. A change of your residence, or your spouse's or other dependent's change in residence; or
- 5. Any other event that the NRA determines will permit a change or revocation of an election during a Plan Year under regulations and rulings of the Internal Revenue Service.

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The Human Resources Division must be notified within 30 days of the "Family Status Change". Changes to current coverage will not be granted past 30 days of the actual "Family Status Change".

Prior to each Plan Year during "Open Enrollment", you will have the opportunity to designate an annual amount for each flexible spending account for the upcoming Plan Year. Employees must re-enroll each vear.

CLAIM SUBSTANTIATION

Reimbursement and claim substantiation procedures are detailed in the NRA Employee Cafeteria Plan Summary Plan Descriptions. Expenses processed for reimbursement must be incurred while participating in a reimbursement account, either as an employee or under COBRA.

FORFEITURE

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Internal Revenue Code Section 125 requires that all unused health care and/or dependent care flexible spending account salary reduction contributions at the end of the plan year must be forfeited. Plan carefully and set aside only as much as you plan to use for the plan year. The flexible spending account funds may be used only for expenses incurred within the Plan Year. You have a three month grace period following the end of the Plan Year to submit expenses incurred within the Plan Year. If you terminate employment prior to year end, you will have a three month grace period following your termination date to submit expenses incurred prior to your termination date.

FLEXIBLE SPENDING ACCOUNT WORK SHEETS

The NRA Employee Cafeteria Plan Enrollment Guide provides guidelines and work sheets to assist you in calculating how much money to contribute in the health care and/or dependent care flexible spending accounts. Additional information about the flexible spending accounts can be found in the NRA Employee Cafeteria Plan Summary Plan Description.

The summary plan description and insurance policies for each plan is provided to employees when coverage is elected. This policy is not intended to be a full and complete description of all of the provisions of the Plan. Insurance benefits are subjected to the conditions contained in the then current insurance policy in effect when a claim arises. There are special conditions, exclusions and limitations to such policies. Furthermore, NRA and the insurance companies specifically reserve the right to alter or change any terms in the insurance policies; including, but not limited to, reductions in the amount of coverage, the addition of further conditions, exclusions and/or limitations, and the cancellation or non-renewal of such insurance policies.

NRA

SUBJECT: LIFE INSURANCE AND ACCIDENTAL DEATH AND DISMEMBERMENT (AD&D)

EFFECTIVE: 02/01/11 PAGE NO.: D-1.05: 1 of 2

The NRA provides Full-Time and Regular Part-Time (regularly work at least 30 hours per week) employees life insurance and accidental death and dismemberment (AD&D) insurance at no cost to the employee. Supplemental employee and/or dependent life insurance is available at a nominal cost to the employee.

ELIGIBILITY

All Full-Time and Regular Part-Time employees who have completed 30 days of service are eligible to participate in the NRA Employee Cafeteria Plan, including group term life and accidental death and dismemberment insurance.

For the purpose of dependent life insurance, qualified dependents are:

a spouse,

unmarried child(ren).

Children include stepchildren, adopted children, children for whom the employee is legal guardian, and foster children for whom the employee provides support. Children are covered to age 19.

Retirees (those who go from active status directly to retirement status) continue to receive life insurance on a reduced schedule. AD&D and supplemental life insurance coverage terminates upon retirement.

EFFECTIVE DATE OF COVERAGE

Coverage begins on the first day following completion of 30 calendar days of service with the NRA.

SCHEDULE OF BENEFITS

Basic Life Insurance

Employees are provided with two times their annual salary (as of November 1 of the previous Plan Year) rounded up to the next higher \$1,000.

Life insurance coverage is reduced to 50% at age 70.

Coverage for retirees is reduced 50% upon retirement and an additional 10% each year in years two through five, to a minimum of \$4,000. A flat reduction to \$4,000 occurs in the sixth year if the reductions have not already reached the \$4,000 minimum.

Group term life insurance is a tax-free benefit in amounts up to \$50,000. The Internal Revenue Service requires you to pay taxes on the cost of coverage over \$50,000. This amount is determined based on your age and an IRS table of "Imputed Income" and is included on your annual W-2 Form at the end of each year. The taxable amount is included on a pro-rata basis to each paycheck during the Plan Year. Supplemental life insurance is paid with pre-tax dollars, therefore the cost of the coverage will be included in calculating your "Imputed Income."

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Accidental Death and Dismemberment Insurance (AD&D)

AD&D insurance provides employees with additional insurance in the event of accidental death or dismemberment. The schedule of payments is detailed in the Certificate Booklet and the actual insurance policy maintained in the Human Resources Division.

AD&D insurance terminates upon retirement.

AD&D insurance is not available under the Supplemental Life Insurance Plan.

AD&D insurance is not available for dependents.

Supplemental Term Life Insurance

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Additional employee life insurance is available on a voluntary participation basis. Contribution rates are based on the employee's age.

Benefits are one or two times the annual salary (as of November 1 of the previous plan year) rounded to the next higher \$1,000, to a maximum of \$500,000.

Life insurance coverage is reduced to 50% at age 70.

Coverage terminates at retirement.

Premium contributions are made on a pre-tax basis.

Dependent Term Life Insurance

Term life insurance is available for your eligible dependents on a voluntary participation basis.

Three coverage options of dependent life insurance are available.

Premium contributions can only be made on an after-tax basis.

Details of these plans are given in the NRA Employee Cafeteria Plan Document, the Summary Plan Description, the Certificate Booklet and the actual insurance policies maintained in the Human Resources Division.

ENROLLMENT

Enrollment in the Basic Life Insurance and AD&D is automatic following completion of 30 calendar days of service with the NRA. You must however indicate a beneficiary on the election form. To enroll, employees must complete and submit an election form to the Human Resources Division within 30 days of their eligibility date. Employees failing to submit an election form will not receive optional supplemental or dependent life coverage for that Plan Year. The Benefits Manager in the Human Resources Division will answer insurance-related questions.

The summary plan description and insurance policies for each plan is provided to employees when coverage is elected. This policy is not intended to be a full and complete description of all of the provisions of the Plan. Insurance benefits are subjected to the conditions contained in the then current insurance policy in effect when a claim arises. There are special conditions, exclusions and limitations to such policies. Furthermore, NRA and the insurance companies specifically reserve the right to alter or change any terms in the insurance policies; including, but not limited to, reductions in the amount of coverage, the addition of further conditions, exclusions and/or limitations, and the cancellation or non-renewal of such insurance policies.

NRA

SUBJECT: SHORT TERM DISABILITY INCOME INSURANCE EFFECTIVE: 02/01/11 PAGE NO.: D-1.06: 1 of 2

The NRA provides Full-Time and Regular Part-Time (regularly works at least 30 hours per week) employees short term disability income insurance (STD) at no cost to the employee. The NRA Employee Cafeteria Plan Summary Plan Description fully describes the short term disability income insurance coverage.

ELIGIBILITY

All Full-Time and Regular Part-Time employees who have completed 30 calendar days of service are eligible to participate in the NRA Employee Cafeteria Plan, including short term disability income insurance.

EFFECTIVE DATE OF COVERAGE

Coverage begins on the first day following completion of 30 calendar days of service with the NRA.

SCHEDULE OF BENEFITS

Pending approval from the disability insurance company, benefits begin following a fourteen (14) calendar day elimination period, which begins at the onset of disability.

After the fourteen (14) calendar day elimination period, benefits are payable at seventy percent (70%) of earnings, up to a maximum of \$1,500 per week, for a total of eleven (11) weeks of disability.

Earnings are defined as your current (as of the on-set of disability) base pay, excluding overtime or other type(s) of extra pay.

Benefits are offset by other benefits, including, but not limited to, both primary and dependent Social Security benefits, worker's compensation, and other state provided disability payments.

ENROLLMENT

To enroll, employees must complete and submit an election form to the Human Resources Division within 30 days of their eligibility date. It is each employee's responsibility to complete and submit his/her election form. The Benefits Manager in the Human Resources Division will answer insurance related questions.

CLAIM SUBMISSION

It is each employee's responsibility to complete and submit an Insurance Claim for Benefits to the Benefits Manager, Human Resources Division. Employees on extended sick leave (beyond the 14 day elimination period) are required to notify the Benefits Manager immediately to ensure timely claim submission for STD benefits.

VACATION, COMPENSATORY, AND SICK LEAVE POLICY APPLICABLE

After the 14-day elimination period and the short term disability claim is approved, the NRA will only pay the employee 30% percent of accumulated sick, vacation, and/or compensatory leave, provided there is an available balance, which is the difference between the insured benefit (70%) and full pay (100%). Employees without accumulated leave will only be paid the insured benefit (70%). The Benefits Manager will process

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the employee's timecard to ensure timely issuance of pay checks.

FMLA POLICY APPLICABLE

As outlined in the Sick Leave and FMLA Policy, Extended Sick and Short Term Disability will be designated as FMLA leave as permitted by law.

CONTINUATION OF BENEFITS

The NRA will continue to provide health (medical and dental), life, AD&D, disability insurance while covered under STD under the same terms and conditions as provided for active employees, subject to the terms, conditions, and limitations of the applicable plans and except if prohibited by law. Employees must continue to pay their share of health coverage premiums each month. If an employee elected to make premium contributions on a pre-tax basis, he/she may continue to do so provided he/she is receiving sufficient leave hours from the NRA. If not, the premium contributions would be made on an after-tax basis by the employee submitting payment directly to the NRA each month. Payment must be received in the Human Resources Division by the last day of each month being covered. Failure to provide timely payments (more than 30 days late) will result in the health care coverage being terminated for the duration of the leave. The NRA will provide written notice, to the employee's last known address of record, at least 15 days in advance that coverage will cease if payment is not received. Coverage will end as of the last premium payment date. Health coverage will be reinstated upon returning to full active duty. Employees may continue to participate in the Health Care Flexible Spending Account and/or the Dependent Care Flexible Spending Account provided he/she is receiving sufficient leave hours from the NRA. Employees not receiving leave pay through the NRA may participate in the Health Care Flexible Spending Account via COBRA. Employees may not continue to participate in the Dependent Care Flexible Spending Account. Employees on short term disability will earn sick or annual leave only if they are being paid with accumulated leave from the NRA or if they are on approved FMLA leave. Employees will receive credit for the purpose of participation and vesting in the pension plan for the entire 14 day elimination period and STD benefits period, provided they are on approved FMLA leave or they are utilizing their own accumulated leave. For the portion of leave that is unpaid, if any, no break in service occurs but no benefits accrue.

RETURN TO WORK

Employees are requested to provide the NRA with at least two weeks advance notice, whenever feasible, of their ability to return to work from short term disability. Employees unable to return to work due to continued illness or injury beyond the 11 weeks maximum benefit under STD will be covered under the Long Term Disability Income Insurance if they are eligible as determined by the insurance company (see insurance policy for full details.) Prior to returning to work, employees will be required to provide certification of their fitness to return to work from a health care provider.

The summary plan description and insurance policy for the STD plan is provided to employees when coverage is elected. This policy is not intended to be a full and complete description of all of the provisions of the Plan. Insurance benefits are subjected to the conditions contained in the then current insurance policy in effect when a claim arises. There are special conditions, exclusions and limitations to such policies. Furthermore, NRA and the insurance companies specifically reserve the right to alter or change any terms in the insurance policies; including, but not limited to, reductions in the amount of coverage, the addition of further conditions, exclusions and/or limitations, and the cancellation or non-renewal of such insurance policies.

NRA

SUBJECT: LONG TERM DISABILITYINCOME INSURANCE EFFECTIVE: 02/01/11 PAGE NO.: D-1.07: 1 of 3

The NRA provides Full-Time and Regular Part-Time (regularly works at least 30 hours per week) employees long term disability income insurance (LTD) at no cost to the employee. The Certificate Booklet fully describes the long term disability income insurance coverage.

ELIGIBILITY

All Full-Time and Regular Part-Time employees who have completed 30 calendar days of service are eligible to participate in the NRA Employee Cafeteria Plan, including long term disability income insurance.

EFFECTIVE DATE OF COVERAGE

Coverage begins on the first day following completion of 30 calendar days of service with the NRA.

SCHEDULE OF BENEFITS

Pending approval from the disability insurance company, benefits are sixty percent (60%) of Basic Monthly Earnings per month to a maximum of \$10,000.

Benefits are offset by other benefits, including both primary and dependent Social Security benefits, and subject to a minimum monthly benefit, subject to terms and conditions under the insurance contract.

Benefits begin after a 90-day elimination period during which time the employee is unable to work and are payable to age 65, subject to the Age Discrimination and Employment Act schedule which may extend benefits to age 70.

Basic Monthly Earnings are your current (as of the on-set of disability) full-time salary excluding bonus or overtime pay.

ENROLLMENT

To enroll, employees must complete and submit an election form to the Human Resources Division within 30 days of their eligibility date. It is each employee's responsibility to complete and submit his/her election form. The Benefits Manager in the Human Resources Division will answer insurance related questions.

CLAIM SUBMISSION

Employees on Short Term Disability who cannot return to full time work status before the 90 day elimination period will automatically be considered for benefits under the Long Term Disability policy.

RETURN TO WORK

As outlined in the Sick Leave, FMLA, and Short Term Disability Policy, extended Sick leave and disability will be designated as FMLA leave as permitted by law and subject to leave eligibility and limits. Employees on Long Term Disability who cannot return to work after consumption of any applicable FMLA leave will be classified as a disabled former employee. NRA reserves the right to fill the position held by the disabled former employee and/or to terminate employment with the NRA. The long term disability company contracted to provide long term benefits will define the employee's disability status for the purposes of LTD

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and related benefits.

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Ability to return to work from long term disability will require at least 30 days advance notice to the NRA, whenever feasible. If the position previously held has been filled, the placement in a position in the NRA will be made on the basis of availability and suitability, and will be at the NRA's sole discretion.

CONTINUATION OF BENEFITS

The disabled former employee status will allow eligibility to continue health coverages (with the exception of AD&D coverage) through the NRA Employee Cafeteria Plan for six months (inclusive of the 90-day elimination period) under the terms, conditions, and limitations of the applicable plan and except if prohibited by law, provided all premiums are paid by the disabled former employee each month and the long term disability insurance carrier deems the person disabled. The NRA will continue to make contributions towards the insurance premium on the same basis provided to active employees. Disabled former employees must continue to pay their share of health coverage premiums each month. Coverage will automatically cease after six months or the day the disabled former employee is declared to no longer be disabled by the long term disability carrier, whichever date occurs first. COBRA will become available to the disabled former employee when coverage is terminated. The NRA will supplement the COBRA premium for the first six months provided the disability insurance carrier still deems the person disabled. The amount will be on the same basis provided to active employees. The COBRA participant will be responsible for the remainder of the monthly insurance premium. After the first six months of COBRA coverage, the participant will be responsible for the full monthly insurance premium. All premium supplements are consided taxable wages and the COBRA premium paid by NRA will be added to the employee's W-2 statement.

Payment of Premium

If a disabled former employee elected to make premium contributions on a pre-tax basis, he/she may continue to do so provided he/she is receiving sufficient salary differential from the NRA. If not, the premium contributions would be made on an after-tax basis by the disabled former employee submitting payment directly to the NRA each month. Payment must be received in the Human Resources Division by the last day of each month being covered. Failure to provide timely payments (more than 30 days late) will result in health care coverage being terminated. The NRA will provide written notice at least 15 days in advance that coverage will cease as of the last satisfied premium payment date unless all payments due are immediately received. COBRA will become available to the disabled former employee when coverage is terminated and the employee will be responsible for the entire monthly insurance premium.

Any available accumulated vacation, sick, and compensatory leave will continue to be paid on a prorated basis (40% of salary) provided the disabled former employee is still deemed disabled and unable to work by the disability insurance company, up to a maximum of one year (inclusive of the 90-day elimination period.) Unused accrued sick and/or compensatory leave will not be paid to the disabled former employee at the end of the one year time frame.

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The summary plan description and insurance policy for the LTD plan is provided to employees when coverage is elected. This policy is not intended to be a full and complete description of all of the provisions of the Plan. Insurance benefits are subjected to the conditions contained in the then current insurance policy in effect when a claim arises. There are special conditions, exclusions and limitations to such policies. Furthermore, NRA and the insurance companies specifically reserve the right to alter or change any terms in the insurance policies: including, but not limited to, reductions in the amount of coverage, the addition of further conditions, exclusions and/or limitations, and the cancellation or non-renewal of such insurance policies.

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NRA

SUBJECT:	EMPLOYEE ASSISTANCE PROGRAM	EFFECTIVE: 02/01/11
		PAGE NO.: D-1.08

The NRA provides confidential and voluntary assistance to all employees and their family members who may be faced with dynamic challenges of financial concerns, legal issues, alcohol or drug problems, marital problems, illness of a family member, emotional worries, child care problems, etc., through an Employee Assistance Program (EAP).

Employees and family members can refer themselves to the EAP. The program may be reached 24 hours a day on weekdays and weekends.

EAP counselors are available to meet with employees and family members to assess a problem and develop a plan for resolution. The counselors may suggest a referral to an outside resource, such as a therapist, agency, physician, treatment facility, or other professional that would be appropriate to assist in resolving the problem or situation. Where an employee may be in need of information, a referral or suggestion may be made over the telephone. There is no charge for employees or their families to use the services of the EAP up to a certain point (as specified in the contract with the EAP). The fee charges for the EAP services are prepaid by the NRA. Referral services, services provided by parties outside of the EAP or services by service providers other than the EAP are not prepaid by the NRA, and, unless covered by insurance, the employee and/or family member will be responsible for all such charges.

Employees who need to visit the EAP during regular work hours must use sick, vacation, or compensatory leave. If illness is involved, the NRA Sick Leave, Short Term Disability, Long Term Disability and Family Medical Leave policy will apply on the same basis that it is granted for other health problems.

The EAP counselors will make every effort to coordinate referral for ongoing treatment with the employee's health insurance coverage as well as his/her ability to pay.

Participation in the NRA's EAP program does not jeopardize job security or promotional opportunities, however it does not excuse the employee from following the NRA's policies and procedures or meeting required standards for satisfactory job performance.

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D2 – Pension Benefits

NRA

SUBJECT:	401(k) PLAN	EFFECTIVE:	02/01/11
		PAGE NO.:	D-1.09: 1 of 2

The NRA 401(k) Plan is a defined contribution retirement plan that allows employees to make pre-tax contributions to accumulate on a tax deferred basis. It provides a great deal of flexibility and choice to meet very different employee retirement objectives. Each eligible employee can decide whether or not to make contributions, how much to contribute (subject to maximum limitations), where to invest among the investment options provided, and when to change the deferral amount or investments.

ELIGIBILITY

All employees who have attained the age of 21 and who complete 90 days of service become eligible on the next quarterly enrollment period (January 1, April 1, July 1, or October 1.)

ENROLLMENT

Enrollment forms must be submitted to the Human Resources Division prior to the next available quarterly enrollment (January 1, April 1, July 1, or October 1). Information regarding the 401(k) Plan and/or enrollment forms are available in the Human Resources Division.

SALARY DEFERRALS

An employee may contribute up to 100% of their income on a deferred basis as long as this dollar amount does not exceed IRS maximum salary reduction limits.

ROTH CONTRIBUTIONS

An employee may contribute up to 100% of their income on an after-tax basis as long as this dollar amount does not exceed IRS maximum limits.

EMPLOYER MATCH

The NRA will match dollar for dollar (100%) on the first 6% of an employee's deferred salary and/or Roth Contribution. The NRA reserves the right to discontinue the employer match at any time.

ROLLOVERS

The Plan permits rollovers from other qualified plans. Proof of qualification will be necessary for the acceptance of a rollover, and rollovers are not eligible for an NRA employer match.

VESTING

Employees are always 100% vested in the contributions they choose to defer and in the employer matching contributions.

NRA

SUBJECT:	RETIREMENT PLAN	EFFECTIVE: 02/01/11
		PAGE NO.: D-1.10: 1 of 2

The NRA Employee Retirement Plan is designed to assist employees in providing financial security for their retirement years. The benefits under this plan are in addition to any benefits to which they may be entitled, such as a 401(k) Plan, Social Security and/or any other retirement plan. The plan is a non-contributory defined benefit plan and is fully funded by the NRA.

ELIGIBILITY

No new or rehired employees are allowed in this plan as of 1/1/2008. All employees hired prior to 1/1/2008 and have attained the age of 21 and who complete one year of service in which they work at least 1,000 hours become eligible on their first employment anniversary date.

ENROLLMENT

Enrollment in the Retirement Plan is automatic on the first day after the eligibility requirement has been met.

VESTING

Vesting in the Retirement Plan is in accordance with the schedule below:

Years of Participation	Vested Benefit
Less than 5	0%
5 or more	100%

RETIREMENT BENEFITS

Retirement benefits will commence on the first day of the month following actual retirement. Sufficient notice must be given to calculate the retirement benefit, and initiate and process the necessary retirement forms. In order for the retirement benefit to begin on a timely basis, the Benefits Manager in the Human Resources Division should be notified in writing at least three months prior to the intended retirement date.

The amount of benefit you will receive will be determined by:

The average of your monthly pay for the highest 60 months out of the 120 latest months which give the highest average, multiplied by;

1.4 percent, multiplied by;

The number of years (and fraction of a year) you are in the Plan.

Normal Retirement

The NRA does not have a mandatory retirement age. However, under the terms of the Plan, the normal retirement date is the first day of the month following your attainment of age 65.

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Early Retirement

You are eligible to receive an Early Retirement Benefit at age 55 provided your years of service plus your age equals 80 or more; or a reduced benefit at age 60, provided you have completed at least 15 years of service. Benefits are paid the first of the month following your date of retirement.

Vested Deferred Benefit

Terminated vested members may begin receiving benefits on the first of the month following their qualification for early or normal retirement. Terminated vested members should provide the NRA with their current home address at all times. They are required to provide at least three months notice in writing to initiate receiving retirement benefits. If the present value of vested members' accrued benefit is less than \$5,000 at the termination date, a lump sum payment will be made instead of a deferred benefit.

RETIREMENT PLAN DETAILS

A full description of the Retirement Plan including payment of benefits, death and survivor benefits, break in service regulations, top-heavy provisions, and ERISA regulations will be found in the Summary Plan Description or official Plan Document. The Human Resources Division can provide copies of both documents.

The summary plan description is provided to all members upon entering the plan. This policy is not intended to be a full and complete description of all of the provisions of the Plan. Any discrepancies that arise between this policy and the written plan documents will be decided in favor of the written plan documents.

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D3 - Other Benefits

NRA

SUBJECT:	TUITION REIMBURSEMENT	EFFECTIVE:	02/01/11
		PAGE NO.:	D-1.11: 1 of 2

The NRA encourages its staff members to improve their professional capabilities through continuing programs of education. The Association will therefore contribute to employee educational costs (educational cost is defined as total amount owed to the educational institution, less any amounts from other resources, such as financial assistance, scholarships, grants or other assistance of tuition and/or book payments that will not be re-paid by the employee) for courses which are essential to an employees improved productivity and effectiveness in their current positions.

STAFF ELIGIBILITY

All regular, full-time employees who have completed one year of employment are eligible to apply for financial assistance to cover tuition and books. Staff members who wish to apply must obtain the Supervisor approval as well as the approval from the Division Director. The final approval is made through the Human Resources Division. Approval must be obtained prior to commencement of each course per semester.

COURSE ELIGIBILITY

Courses eligible for educational assistance include:

- 1. Courses directly job-related that are demonstrated to be necessary to obtain an undergraduate or graduate degree;
- 2. Courses must be offered by an accredited school, college, university, or correspondence school.

SUPERVISOR'S RESPONSIBILITY

Supervisors should discuss each applicant's education and career goals and the details of this education assistance plan with the employee. Supervisors must have the approval from both the Division Director and the Human Resources Division before indicating that any course is deemed officially approved for reimbursement.

EMPLOYEE'S RESPONSIBILITY

Prior to course registration, all employees should discuss with their supervisors the relationship of the course to the job. All employees must complete the Application for Tuition Reimbursement and have their Supervisor and Division Director sign it. This form should be forwarded to the Human Resources Division for final approval.

APPROVAL

If an application is approved by the Supervisor, Division Director, and the Human Resources Division, the employee is then eligible for educational reimbursement. Initial approval for a course of study does not obligate the NRA to future/continued approval of courses in that course of study. Approvals are only valid for the course and semester given. The annual amount of tuition reimbursement may be limited due to budgetary constraints. **The program funds are available on a first-come-first-serve basis.**

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EDUCATIONAL ASSISTANCE REIMBURSEMENT

Reimbursement is made at the completion of the class. Receipts for tuition and books must be submitted, as well as the course grade before reimbursement will be given. Reimbursement is granted to only those applications approved prior to course commencement.

SCHEDULE OF REIMBURSEMENT

100% for grades of A+, A, A-, or for a 'Pass' in a pass/fail grading situation;

80% for grades of B+, B, B-;

50% for grades of C+, C, or C-;

0% for a grade of D+ or lower.

A maximum of \$200 for required textbooks per approved course will be reimbursed with receipts and a grade of C or higher.

FEDERAL WITHHOLDING

According to the Internal Revenue Code (IRC), tuition and book benefits may be considered wages and subject to withholdings for income tax, and FICA. If taxes are applicable, the NRA will include the amount provided for educational assistance as total income on the employee's W-2 form.

TERMINATIONS OR SEPARATIONS

Employees who voluntarily leave employment with the NRA or terminated for cause prior to completing one year of service after tuition reimbursement funds are paid will be responsible for reimbursing the NRA for all tuition / book fees paid.

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NRA

SUBJECT:	EMPLOYEE REFERRAL PROGRAM	EFFECTIVE: 02/01/11
		PAGE NO.: D-1.12

The NRA encourages its employees to take an active role in its employment recruiting efforts. Because employees understand the mission and standards of the NRA, they can effectively promote the Association to potential employees. The employee referral should serve as the point of first introduction for the potential employee. Persons who are or who have worked as an agency-placed temporary employee for the NRA are ineligible.

An Employee Referral Fee will be paid to any eligible employee who is responsible for recommending an individual who becomes a staff member (both exempt and non-exempt) when the following criteria are met:

The newly-hired employee has successfully completed the introductory period (90 days from date of hire);

The eligible employee is on the payroll and on "active status" at that time; and

Areferral card is filled out and given to Human Resources at the time of resume/application submission.

Who is eligible:

All current Full or part-time employees below the status of Assistant Director.

(Human Resources employees directly involved in the hiring decisions are not eligible.)

Procedure:

Employees wishing to submit a candidate for consideration for a currently open and advertised position should bring the persons resume or application to Human Resources. An employee referral form must be filled out at this time (by the employee) in order to assure proper credit.

The NRA encourages promotion from within the organization. Internal candidates, when qualified, will receive first consideration when vacancies occur. Employee referrals will have the same consideration as all other external candidates.

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NRA

SUBJECT: **EMPLOYEE SUGGESTION PROGRAM EFFECTIVE: 02/01/11** PAGE NO.: D-1.13

It is the policy of the NRA to encourage employees to make constructive suggestions for the improvement of operations and services to members. Suggestions that solve problems, improve operations or procedures, or make for a more productive and positive environment are actively sought by management. To help encourage suggestions that improve operations and services to members, the NRA has implemented an NRA Employee Suggestion Program. All employees suggestions will be evaluated by Human Resources. Implemented suggestions may be eligible for cash awards and non-cash awards (i.e. gift certificates, movie passes, dinner for two, etc.)based upon the benefit and/or cost savings to the Association. Employees are encouraged to propose:

More efficient ways to perform duties and/or reduce costs;

Improvements in quality or member services;

Better methods to produce services or goods;

Ways to reduce waste or spoilage;

More efficient ways to use office space;

New sources for obtaining supplies;

Ideas for improving attendance and punctuality;

Methods for making work areas safer, cleaner, and/or more comfortable;

Better ways to safeguard the NRA and employee property; or

Revisions or improvements to NRA policies and/or procedures.

Suggestions should be submitted in writing with a description of the idea along with advantages and disadvantages, best guess costs of implementation, and any alternatives that might be considered. A suggestion box with forms is located in the NRA Cafe. Suggestions should be placed in the suggestion box or mailed directly to the Human Resources Division.

Your Supervisor, Division Director, and senior management welcome your ideas. Employees will receive feedback on their signed suggestions, regardless of whether or not they are implemented.

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SUBJECT:	DIRECT DEPOSIT	EFFECTIVE:	02/01/11
		PAGE NO.:	D-1.14

The NRA offers employees the opportunity to have their paychecks automatically deposited directly into their savings, checking, and/or credit union accounts. You can designate up to four direct deposits from each paycheck. It initially takes two pay cycles to establish direct deposit after submitting a Request for Automatic Deposit Service form to the Human Resources Division. These forms are available in the Human Resources Division. Employees can start or stop participating in direct deposit at any time.

NRA

SUBJECT:	COMPLIMENTARY ANNUAL NRA MEMBERSHIPS FOR EMPLOYEES	EFFECTIVE: 02/01/11 PAGE NO.: D-1.15
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Complimentary Annual Employee Membership

The NRA will provide a complimentary annual NRA membership, including your choice of magazine, to all staff. Additionally, employees may obtain regular memberships for their immediate family members at the employee discount rates listed below.

	Employee rate	Regular rate
One year membership/renewal	\$25	\$35
Three-year membership/renewal	\$68	\$85
Five-year membership/renewal	\$100	\$125

^{*}These rates are subject to change.

Life Membership

As a lifetime member of the NRA, you acquire voting status and lifetime member benefits.

Perhaps the most important part of Life Membership is the satisfaction a member gets from the commitment to the NRA, the Second Amendment, and the increased level of support the member gives to the NRA. Four levels of Life Membership are available:

- C Regular
- C Endowment
- C Patron
- C Benefactor

Employees can obtain a one-time discount toward the purchase of any one lifetime membership category.

Additionally, employees may obtain regular memberships for members of their immediate family at discount rates. The Membership Division can give you details.

Payment can be made by check, credit card, or through payroll deduction. Current life members can upgrade to an enhanced membership category also through a payroll deduction. Forms are available in the Human Resources office and the Membership Division.

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SUBJECT:	NRA MERCHANDISE DISCOUNTS	EFFECTIVE: PAGE NO.:	02/01/11 D-1.16

The NRA encourages employees to purchase NRA merchandise for themselves and as gifts. Such purchases provide financial support for a variety of NRA programs. Employees may purchase non-clearance items at a discount. It is the discretion of the NRA to limit those items available for the employee discount. All discounts are subject to limitations. Identification badges must be shown to obtain employee discounts.

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D4 - Facilities

NRA

SUBJECT:	FITNESS FACILITIES	EFFECTIVE:	02/01/11
		PAGE NO.:	D-1.17

The NRA has two state-of-the-art fitness rooms located on the C Level/South for employee use. The rooms are equipped with nautilus, life cycles, tread mills, stair masters, a roman chair, a chin-up/dip bar and free weights. The locker rooms have lockers, showers, a scale and a small sauna.

A waiver of liability form must be completed before access to the fitness rooms will be granted. These Fitness Facilities are intended for use only by NRA employees and the employees of current tenants. No guests are permitted.

An employee must obtain a form NRA Release, Waiver, Indemnification, Hold Harmless, and Assumption of the Risk (Release) Agreement from the NRA Security office. The Release must be completed, signed and returned to the NRA Security office before the employee may enter and use the Fitness Facilities. It is the responsibility of the employee wishing to use the Fitness Facilities to obtain the Release and sign and return it to the NRA Security office. An employee who has not executed the Release may not enter or use the Fitness Facilities.

Additionally, it is the responsibility of the user of the Fitness Facilities, and his or her physician, to determine if he or she is in a physically fit condition to use the facilities. By using the Fitness Facilities, the user is warranting and representing to the NRA that he or she is in a physically fit condition to use the facilities.

When using the gym, employees must adhere to posted instructions. Misuse or abuse will not be tolerated and may result in termination of your privilege.

NRA employees are responsible for security of their personal belongings while using the fitness facilities. Lockers are for daily use and must be emptied immediately after use of the fitness facilities. Any items left in lockers overnight will be brought to the Security Office and will be disposed of if unclaimed after 5 days. The NRA is not liable for any loss of personal valuables while using the facilities.

For your safety, large red assistance buttons are located in both fitness rooms. These buttons signal the Security Desk and should be used for emergencies only.

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NRA

SUBJECT:	PARKING	EFFECTIVE: 02/01/11
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Employees, tenants and visitors are permitted to park their vehicles in any marked parking space on any level of the parking garage/deck and surrounding lot, except in reserved spaces. The parking garage is equipped with panic buttons which may summon security assistance, if available, when activated. For extra security, employees may request an escort to their vehicles by contacting the Security Office or by visiting the Security Reception Desk in the Lobby/North. An employee is responsible for his or her own security and the NRA does not assume the responsibility of providing such security.

All vehicles which are parked on NRA property must be registered with the Security Office. Required information includes owner's name, vehicle make, model, color, year, tag number, and owner's extension number. This information may be used by Security personnel to notify owners of any problems with their vehicles, such as lights being left on or a need to move vehicles. The NRA is not hereby agreeing to undertake any duty to notify owners of any problems with their vehicles.

Registration cards may be obtained from the Security Reception Desk (Lobby/North) or the Security Office (2nd Floor/North). An employee must obtain a registration card from the NRA Security office, complete and sign the registration card, and return the executed registration card to NRA Security, before that employee may enter and use the NRA parking facilities. It is the responsibility of the employee wishing to use the NRA parking facilities to obtain the registration card and sign and return it to NRA Security. An employee who has not executed the registration card may not enter or use the NRA parking facilities.

Employees are reminded to take time to ensure vehicle security before entering the NRA headquarters building. It is the responsibility of each employee to ensure the safety of their vehicles while on NRA property. The NRA is not liable for any loss or damage to vehicles or to personal property in the parking facilities.

Due to travel obligations, employees may leave their vehicles overnight on NRA property provided they have notified Security personnel of their desire to do so. Employees must provide the Security Office with a memorandum stating the following: employee's name, work extension number, emergency notification number, vehicle make, model, color, year and information regarding how long the vehicle will remain on NRA property. Vehicles must be parked on the rear upper level parking deck so they are visible from the Security Desk.

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NRA

SUBJECT: FACILITIES EFFECTIVE: 02/01/11 PAGE NO.: D-1.19

The Facilities department handles various employee and building needs. Following is a sample list of the types of services that this department provides. Please see the document titled 'Misc. Facilities Requests' on the Facilities bulletin board on Outlook for specifics on how to request the various services listed here. The Facilities bulletin board also has other information regarding Facilities and the NRA Mail Room that are updated regularly.

Meeting room set-up and tear-down

Box moves

Furniture assembly, repair & moving

Copier paper delivery

Light bulb replacement

Clogged toilets and other building equipment issues

Temperature regulation

Cleaning

Desk keys

Office keys

Nameplates

Picture hanging

Miscellaneous facilities repairs or issues

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NRA

SUBJECT:	MEETINGFACILITIES	EFFECTIVE:	02/01/11
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The NRA Headquarters has several main meeting facilities throughout the building, as well as smaller division conference rooms. The auditorium and multi-purpose rooms offer the greatest space and are equipped with state-of-the-art audio/visual equipment. All rooms must be scheduled for use in advance. The current *NRA Meeting Facilities Guide* which contains contact information for room scheduling, set-up, catering, audio/visual assistance as well as general room use guidelines can be found on the Facilities bulletin board on Outlook.

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NRA

SUBJECT: COURIER PICK-UPS AND DELIVERIES EFFECTIVE: 02/01/11 PAGE NO.: D-1.21

NRA has made arrangements with a vendor to supply courier service. This service is used for packages that require same-day delivery to a company or personal residence in the DC metropolitan area. The service will also pick up packages and bring them back to the NRA headquarters building. All arrangements for courier deliveries are to be made through Administrative Services. Please see the document titled 'Misc. Facilities Requests' on the Facilities bulletin board for specific guidelines on arranging for courier services.

Incoming courier mail, whether arranged by someone at headquarters or sent from another party, is X-rayed upon arrival and logged into the Security computer log. Recipients of packages will be notified that packages have been delivered and can be picked up at the Security reception desk. If incoming courier mail is not picked up within 24 hours of arrival, it will be taken to the Mail Room for distribution.

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NRA

SUBJECT: CAFE EFFECTIVE: 02/01/11 PAGE NO.: D-1.22

The NRA Cafe is located on the 1st Floor/North and provides a variety of reasonably priced breakfast, lunch, and snack food selections.

Hours of Operation:

Monday through Friday 7:30 am - 4:00 pm Breakfast 7:30 am - 9:00 am Lunch 11:30 am - 2:00 pm

Menus:

Daily specials are posted on the menu board in the entrance corridor and on the NRA Connection.

Catering:

The NRA Cafe offers catering services for NRA business related meetings, receptions, parties, etc. Please contact the General Manager for details. Catering services are provided at the discretion of the NRA Cafe.

NRA employees wearing or displaying their employee badge will receive a discount on food and beverage purchases (this excludes catering purchases).

Trays, silverware, china, salt and pepper shakers, etc. are not to be taken from the Cafe. Disposable cutlery, cups, take-out containers, and packaged condiments are available for your convenience.

A refrigerator and two microwave ovens are available for use in the Dining Room. The refrigerator is emptied and cleaned every Friday after 4:00 pm (or the last day of the week in the event of a holiday). All food will be discarded at that time. Containers will be washed and left on the counter by the refrigerator for pick-up. The Cafe is not responsible for food or containers left in the refrigerator or anywhere else.

A private dining room is located inside the main dining area of the Cafe. This room can be scheduled for NRA business related use by contacting the appropriate person found on the *NRA Meeting Facilities Guide*. This room is not to be used without first obtaining from the NRA Cafe a prior reservation. Permission to grant such use is at the discretion of the NRA Cafe.

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APPENDIX

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NATIONAL RIFLE ASSOCIATION OF AMERICA

TRAVEL AND BUSINESS EXPENSE REIMBURSEMENT POLICY



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NATIONAL RIFLE ASSOCIATION OF AMERICA TRAVEL EXPENSE REIMBURSEMENT POLICY

I. OVERVIEW AND PURPOSE

The purpose of this policy is to outline travel expense reimbursement and entertainment expense procedures for reporting consistency and control. The policy applies to employees traveling on behalf of the National Rifle Association (NRA), as well as non-employees (volunteers, paid consultants) traveling on behalf of the NRA for a specific business purpose approved by the NRA. The basic rationale underlying all NRA travel regulations is that we should incur the lowest practical and reasonable expense while completing the travel process in an efficient and timely manner. Persons traveling on NRA business have the duty to exercise care and avoid impropriety, or even the appearance of impropriety in any travel expense.

It is the intent of the NRA to reimburse employees traveling on its behalf for actual and reasonable expenses incurred while traveling on official business. To qualify for reimbursement, an expense item must be incurred for NRA-related business. NRA-related business is defined as those activities, which are necessary to meet organizational objectives. Travelers are expected to use the same care in incurring expenses that a prudent person would use while traveling for personal reasons, considering the purpose and amount of the expenditure. Any questions on this policy should be directed to the Financial Services Division. Each employee is responsible for adhering to the policies defined below when incurring expenses, which the employee wishes NRA to reimburse.

The person(s) who approve the expense report is responsible for understanding the need for the expenses, reviewing the substantiation of the expenses, and determining that the expenses are appropriate and have been reported correctly.

Employees incurring expenses and those approving them are responsible for making sure that expenses are in accordance with NRA policy and ethical standards, sound business practices, applicable laws, and are clearly in NRA's interest.

The policy set forth below address business travel and entertainment expenses normally encountered in business situations. This policy cannot address every conceivable situation. In situations not covered by this policy, sound business judgment and common sense should be used.

In cases of uncertainty or which need policy clarification; employees should consult with their approving director <u>prior</u> to incurring the expense. The employee bears the responsibility for ensuring that all expenses are authorized. Unauthorized expenses will not be reimbursed.

Interpretations of variations on this policy may be approved by an Officer, within the limits of compliance with IRS regulations.

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NATIONAL RIFLE ASSOCIATION OF AMERICA TRAVEL EXPENSE REIMBURSEMENT POLICY

II. PROCEDURES FOR TRAVEL AUTHORIZATION

A. General

A Travel Authorization must be completed for travel that involves an overnight stay or the purchase of airfare by employees. Travel Authorizations must state the purpose of the trip. See Attachment 1 for an example of the Travel Authorization form. Supplies of the form are maintained by headquarters and may be requisitioned from the mailroom.

B. Approval

The division director must approve domestic trips. With limited exceptions based upon the written approval of the Executive Vice President, the officer responsible for that division must approve all international trips. Division directors must also have their travel approved by the executive office responsible for that division. Officers and their designees have blanket authorization for travel and determine their own schedules. Divisions may have supplementary approval requirements for travel authorizations in addition to those stated in this policy.

C. Submission Requirements

Approved Travel Authorizations must be submitted to the Travel Coordinator/Office of the Treasurer at least ten (10) working days prior to the commencement of travel. If a Travel Advance is requested, Part 1 (the white copy only) of the Travel Authorization form will be forwarded to the Financial Services Division for processing. Part 5 (green copy) of the Travel Authorization form should be retained by the issuing department and the remaining parts sent to the Travel Coordinator/Office of the Treasurer.

D. Accounting Codes

All travel authorizations must contain a designated travel expense code from the NRA's official Chart of Accounts published by the Financial Services Division.

E. Travel Authorization Number

A travel authorization number is pre-printed on the form and uniquely identifies a trip. The NRA's travel agent uses the pre-printed number and accounting codes, as referenced in section "D" above, to identify an authorized trip when making transportation reservations. For the Annual Meeting and other meetings (i.e., Camp Perry, Police Championship, etc.) staff and volunteer lists are prepared and approved by the appropriate authorizers. These lists are forwarded to the Travel Coordinator/Office of the Treasurer, assigned a unique authorization number and then sent to the Travel Agency.

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NATIONAL RIFLE ASSOCIATION OF AMERICA TRAVEL EXPENSE REIMBURSEMENT POLICY

The NRA has instructed the travel agent not to accept reservations without a travel authorization number or an approved/official meeting list.

F. Allowable Costs

In preparing travel authorizations, travelers need to provide an estimate of the cost of the trip. Allowable costs include: round-trip mileage to and from the airport in excess of the regular work location, weekend mileage, parking, tolls, taxicabs to and from the airport or to the work location, common carrier transportation, hotel expenses, daily expenses, telephone calls and conference or meeting fees if appropriate.

G. Amending a Travel Authorization

Should a travel authorization need to be amended (i.e. increase/decrease in cash advance, change in travel dates), notification must be given to the original authorizing person. The original authorizing person should contact the Travel Coordinator/Office of the Treasurer and advise them of the necessary changes. A new travel authorization does not need to be issued; the present one can be modified.

H. Personal Injury Accidents

An employee has the responsibility to seek medical attention whenever injured while traveling on official business, and to notify his/her immediate supervisor as soon as possible. The employee should follow the NRA's internal procedures as outlined in the NRA Employee Handbook.

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NATIONAL RIFLE ASSOCIATION OF AMERICA TRAVEL EXPENSE REIMBURSEMENT POLICY

III. PROCEDURES FOR TRAVEL ADVANCES AND EXPENSE REIMBURSEMENT

A. General

As a general rule, employees should pay travel and business-related expenses by credit card and then obtain reimbursement by submitting an expense report. Reimbursement will be provided by check or direct deposit (see Attachment 3 for the Employee Expense Reimbursement ACH form). An employee may obtain a travel advance when circumstances make it unreasonable for the employee to incur the expense and then obtain reimbursement (e.g., for extended trips, or for employees who do not have or want to use a credit card). These advances must be requested on the Travel Authorization form. The minimum travel advance will be \$100. The employee's supervisor must approve advances. A request for a travel advance must specify the name of the traveler, approximate dates, location, and cost of travel.

B. Repayment of Advances

Travel advances may be cleared by submitting an expense report within thirty (30) business days from the completion of travel for an amount greater than or equal to the amount of the advance; or by attaching a check or money order to the total expense claimed, if the total expense claimed is less than the advance. Cash repayments must be hand carried to Financial Services and a receipt will be issued. (NOTE: IRS regulations require the filing of expense reports within 60 days to avoid a travel advance being considered taxable income). Checks should be made payable to the order of the National Rifle Association. A new travel advance will not be issued if a previous advance has not been settled. Advances which are not settled prior to an employee's separation from the NRA will be deducted from the last paycheck.

IV. TRANSPORTATION

Travelers are required to use the transportation mode that gets them to and from the intended destination in the manner that is most cost effective to the NRA. When practical, courtesy vehicles or other commercial shuttle services should be used instead of single-fare taxis. Reimbursement may be claimed for parking charges, taxi fares, and tolls. Travelers must clearly indicate on the Expense Report form all calculations to support the amounts they are claiming.

A. Commercial Airfare and Rail Transportation

Only coach class tickets, or their equivalent, are generally reimbursable for domestic travel. Exceptions must be explained and approved in writing as appropriate, and submitted with the travel expense report. In order to obtain a lower fare, or to ensure seating on a heavily traveled flight, the traveler is encouraged to purchase airline tickets in advance and consider alternate airports, or flights with connections. If a flight reservation is changed or canceled and results in an additional fee, a reason must be provided. Reimbursement will not be made for flight cancellation insurance or additional life insurance purchased. First class train passage is an acceptable alternative to coach airfares of equal or greater value.

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NATIONAL RIFLE ASSOCIATION OF AMERICA TRAVEL EXPENSE REIMBURSEMENT POLICY

No more than two (2) officers should fly on the same plane. Under no circumstances should the Executive Vice President and the Executive Director of General Operations travel together. In addition, no more than three (3) key employees from the same department or three (3) directors should fly on the same plane. Exceptions to this policy should be made only when alternative travel arrangements would impose a hardship. NRA's travel agency will assist in adhering to these restrictions.

B. Rental Cars

Employees should use public transportation (taxicabs, airport limousines, and local transits) in preference to renting a car when such means of transportation is cost-effective, and there are no other business reasons for renting a car. Car rentals should be authorized only when local transportation is not practical or would be more expensive. To the extent possible, the NRA encourages employees to coordinate transportation service when two or more NRA employees travel for the same purpose at the same time. The smallest size car consistent with the needs of the traveler should be requested. If an employee is a frequent traveler, the Office of the Treasurer can issue a Hertz Charge Card to him/her. The issuance of this card will require a letter from the same level of signature authority, as does the Travel Authorization. The IRS standard mileage rate of reimbursement is not applicable to rental cars. Only actual expenses are reimbursed (i.e. gasoline, tolls, and parking).

The NRA has insurance coverage for employees renting automobiles while on official travel. The NRA will not reimburse the employee for the Loss Damage Waiver (LDW), Personal Accident Insurance (PAI), Personal Effects Coverage (PEC), and the Liability Insurance Supplement (LIS) provisions of a rental car agreement. The employee may purchase any of these provisions to cover personal travel, but the charges should not be submitted on the employee's expense report.

V. LODGING, MEALS, AND ENTERTAINMENT EXPENSES

Travelers must attach the original receipts for any expenses over \$50.00 to the expense report. However, it is encouraged that all receipts be submitted for all expenses. If an original receipt is not available, a statement explaining the circumstances must be attached to the claim. If receipts or statements are not attached and depending on the circumstances, the amount of the claim over \$50.00 may be disallowed and deducted from the total. Receipts, in order to be adequate, must show the amount, date, place and business reason for the expense if not obvious. Hotel receipts should show separate amounts for lodging, meals and telephone calls. Restaurant receipts should also show the location in addition to the name of the restaurant and the number of people served. For conference fees, a copy of the conference registration form must be attached to the expense report. If registration occurs via the Internet, print a copy of the registration form that indicates the paid amount and attach it to the expense report.

A. Hotel Expenses and Travel-Related Meals

Daily expenses are reasonable charges for lodging, meals, tips and other incidental expenses necessary to sustain an employee while he/she is away from home. Daily expenses should be claimed for the employee only. However, in certain circumstances (meals for instance), it is not practical or desirable to obtain individual receipts. A designated employee may pay for the entire group, or other equitable arrangements can be made as long as the other employee names are included on the receipt.

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NATIONAL RIFLE ASSOCIATION OF AMERICA TRAVEL EXPENSE REIMBURSEMENT POLICY

Travelers shall be reimbursed for the actual cost of lodging, including sales taxes. The traveler's lodging receipt must show each night registered. A lump sum billing, covering several days, is not acceptable.

The reasonable costs of meals purchased by an employee while traveling on business is reimbursable. The reported cost of meals should include taxes, tips or service charges as applicable. Even though receipts are only required for individual expenses of \$50 or more, employees are encouraged to obtain receipts for all meals. If cash payment for a meal cannot be avoided, an itemized bill should be submitted as support. The chits from the bottom of restaurant bills are not considered adequate receipts.

Daily expenses may also include laundry and dry cleaning expenses if the business portion of the trip consists of five (5) or more consecutive days.

B. Entertainment/Business Expense

The actual cost of entertainment will be reimbursed when it is shown that the entertainment was for specific business purposes. Expenditures for meals and entertainment related to business meetings with outside representatives are considered to be ordinary and necessary business expenses. Expenses should be justified in relation to the importance of the business association in line with prudent business practices. To meet the IRS requirements, the employees must provide the following information for each occasion of business entertainment, regardless of the amount.

- The date of entertainment.
- Nature of expenditure, e.g. lunch, dinner, theater, sporting event.
- A brief description of the business purpose.
- The names and business relationship of the parties entertained.
- The dollar amount spent.

The business entertainment must be directly and principally related to NRA's business, expected to produce a specific business benefit, and attended by both the employee and business associate.

VI. OTHER REIMBURSABLE EXPENSES

A. Telephone Calls

Employees are expected to use their best judgment in making personal phone calls. Personal calls (i.e., calls to home), made with discretion as to number and duration, are reimbursable. The cost of the call should be claimed on the expense report form on the "Other" line. Telephone calls to the office, other business calls, or calls to make travel arrangements are reimbursable. Personal calling cards or mobile phones are encouraged to avoid expensive hotel surcharges.

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NATIONAL RIFLE ASSOCIATION OF AMERICA TRAVEL EXPENSE REIMBURSEMENT POLICY

B. Tips & Gratuities

As a general guide, gratuities for meals should be fifteen (15) percent of the pretax cost of the meal. Tips to taxi drivers, baggage handlers, porters and hotel maids should be reasonable in relation to the number and size of bags transported or length of stay, as appropriate.

C. Personal Auto Expense

Employees will be reimbursed for the business use of a personal automobile at the mileage rate prescribed by the IRS. This mileage allowance is provided to cover gasoline, oil, repairs, maintenance, depreciation, and all other operating costs. Tolls and parking fees are also reimbursable. Any update in the IRS rate will be communicated via memorandum from the Treasurer's Office.

Commuting costs are not reimbursable. However, commuting cost to a temporary local work site or meeting may be reimbursed to the extent they exceed the mileage to the regular work location. Mileage to and from an airport for business travel is reimbursable to the extent the mileage exceeds mileage to the regular work location. Weekend mileage is fully reimbursable.

VII. PERSONAL EXPENSES

Expenses of a personal nature are not considered reimbursable (e.g. books, toiletries, medications, haircuts, babysitting fees, and non-business entertainment such as hotel in-room movies). Personal expenses charged to a hotel bill must be identified and deducted from the overall reimbursable expense.

Occasionally, an employee may desire to combine personal travel and/or vacation with a business trip. This is permissible provided that:

- The reason for the trip is clearly NRA business;
- No extra expense to NRA is involved; and
- Personal travel does not interfere with the business objectives of the trip.

Extra costs incurred on a trip for a member of the employee's family are not reimbursable. The employee will be reimbursed for only those business costs, which would have been incurred, had the employee traveled alone. This does not apply if the employee's spouse/family member is on a trip at the NRA's request. The request must be approved by an Officer.

Other non-reimbursable expenses include:

- Fines and penalties for traffic violations
- Gasoline for automobile travel when the employee is paid by the mile
- Expenditures for items governed by other policies (capital assets, etc.)

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NATIONAL RIFLE ASSOCIATION OF AMERICA TRAVEL EXPENSE REIMBURSEMENT POLICY

VIII. TRAVEL AGENTS

See Attachment 2 page 184 for detailed information about the NRA's current travel agent.

A. NRA Travel Agent

Employees are required to use the NRA's travel agent to make travel reservations, unless otherwise approved by the Executive Vice President. The exception to the requirement would be when an "e-fare" is found that involves significant savings which can only be booked on the Internet. (NOTE: Most "e-fare" can be booked by NRA's travel agent or through NRA's online booking software). The NRA has established a billing relationship with the agency that provides certain benefits, including travel AD&D insurance accrued to the traveler. Employees need not charge airfares to their personal credit cards unless they are taking advantage of an "Internet/e-fare". (NOTE: Certain employees prefer to look up e-fares, times, etc. prior to calling NRA's Travel Agency. This is not required to book your flight through the agency.)

The NRA's travel agent will also make reservations for hotel and car rentals if requested.

B. Travel Authorization Number

The NRA's travel agent will ask for a travel authorization number. This is the pre-printed number on the Travel Authorization form as shown in page 183. When making reservations with the NRA's travel agent, travelers should be as flexible as possible on departure and return date, as well as departure/arrival airport to take advantage of discount airfares.

C. Problems with Ticketing or the Travel Agent

The NRA's travel agent can easily handle most ticketing and reservation problems. If a problem cannot be resolved with the travel agent, the details should be reported to the Treasurer's Office.

D. Electronic Ticketing

Employees are strongly encouraged to use electronic ticketing for all airline travel unless there are special circumstances that would require a paper ticket. Additional fees are now being charged for paper tickets.

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Attachment 1-Travel Authorization Form

PART 1 - ACCOUNTING-CHECK REQUEST COPY

		L RIFLE ASSO				31972	
NAME			DYEE I.D.			DATE PREPARED	
TRAVEL DATES		TRAVEL ORIGIN		TRAVE	TRAVEL DESTINATION		
From:	Τ φ :	1					
REASON FOR TRAVEL				e comment a manufacture	MODE OF TH	AVEL OTHER	
AMOUNT OF ADVANCE REQUESTED DOLLARS				AUT	AUTHORIZED DAILY RATE		
SPECIAL INSTRUCTIONS F				NRA CONTACT			
ORIGINATOR: APPROVED BY:					PHONE #		
					•	s advanced for	
ACCOUNT DISTRIBUTION			official NRA travel are to be accounted for by an				
CENTER ACCOUNT			approved travel expense report within one week of completion of travel.				

PART 4 - TRAVEL AGENCY PART 5 - ORIGINATING DEPT. COPY PART 6 - EXPENSE REPORT COPY

PART 2 - FOLLOW-UP COPY

PART 3 - TRAVEL DESK-NRA

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Attachment 2

MacNair Travel Management is the official travel agency of the NRA.

MacNair's hours of operations are **8:30 a.m. to 6:00 p.m. Monday thru Friday.** An After Hours Emergency Service will also be provided should you need assistance outside normal business hours.

Please contact NRA's designated Corporate Agent(s) or the After Hours Emergency Service at the numbers listed at the bottom of this page for your travel needs.



SERVICE TEAM

For

National Rifle Association

NRA Ms. Sandy Saunders (703) 650-5316 Dedicated Line

Corporate Consultants saunders@macnairtravel.com (866) 451-6429 Dedicated Line

(Weekdays 8:30AM – 7:00PM) (703) 836-2078 Fax

Ms. Khim Lawrence (703) 650-5316 Dedicated Line klawrence@macnairtravel.com (866) 451-6429 Dedicated Line

(703) 836-2078 Fax

Ms. Viktoria Rohrbaugh (703) 650-5316 Dedicated Line vrohrbaugh@macnairtravel.com (866) 823-6429 Dedicated

Line

(703) 836-2078 Fax

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After Hours Emergency Service ID#1JZ73 (877) 638-0697

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NRA Facilities Guide

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NRA HEADQUARTERS LOCATOR

<u>Cellar</u>

North Tower:

Information Services

South Tower:

- ♦ Auditorium
- Building Engineers
- ♦ Fitness Rooms

1st Floor

North Tower:

- NRA Café
- Mail Room
- ♦ Reception/Security Desk

South Tower:

- ♦ National Firearms Museum
- Museum Store
- ♦ Welcome Center

2nd Floor

North Tower:

- ♦ Financial Services
- ♦ Human Resources
- NRA Foundation (Grants)
- Purchasing
- Security Office

South Tower:

Museum Offices

3rd Floor

North Tower:

- ♦ Membership
- ♦ Telecommunications/A-V

South Tower:

◆ Tenant Space

4th Floor

North Tower:

- ♦ Advancement
- Field Operations
- Publications

South Tower:

- Hunter Services
- Media Relations
- Sales & Program Materials

5th Floor

North Tower:

- ILA Administration
- ILA Conservation, Wildlife & Natural Resources
- ♦ ILA Executive Office
- ♦ ILA Fiscal Operations
- ILA Public Affairs
- ♦ ILA Research & Information
- ♦ ILA State & Local

Atrium:

- ♦ ILA Grassroots
- ◆ Law Enforcement Activities

6th Floor

North Tower:

- ♦ Office of the EVP
- ♦ Office of the President
- ◆ Office of the 1st VP and 2nd VP
- Office of the Secretary
- Office of the Treasurer
- Administrative Services
- General Counsel
- General Operations Administration

South Tower:

- Competitive Shooting
- Education & Training

Atrium:

Information Services

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NRA MEETING FACILITIES GUIDE

Provided by Administrative Services

	Location	Capacity	Contact Person	Contact Ext.
Atrium Conference Room	6th Floor/North Room 6002	12	General Counsel	1252
Executive Conference Room	6th Floor/North Room 6101	15 at table 10 on sides	Administrative Services	1440
Atrium Conference Rooms (2)	6th Floor/South Rooms 6S-1, 6S-2	24 (12 each)	Competitive Shooting	1480
Atrium Conference Room	5th Floor/North Room 5002	10	ILA Communications	1193
Atrium Conference Room	4th Floor/North Room 4002	10	Field Operations	1340
Atrium Conference Room	3rd Floor/North Room 3002	10	Membership	3749
Multi-Purpose Room (A)	2nd Floor/North	20	Administrative Services	1440
Multi-Purpose Room (B)	2nd Floor/North	20	Administrative Services	1440
Private Dining Room	1st Floor/North Room 1025 (Cafe)	12	Administrative Services	1440
Auditorium	C Level/South Room 0115	122	Administrative Services	1440
Conference Room A	C Level/South Room 0113 (CS-1)	10	Administrative Services	1440
Conference Room B	C Level/South Room 0114 (CS-2)	10	Administrative Services	1440

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FACILITIES REQUESTS

ALUMINUM CAN RECYCLING:

► There are aluminum can recycling bins at each soda machine location.

CLEANING ISSUES:

► Call Facilities @ x1440 with any cleaning issues. This includes trash not picked up as well as spills and other emergencies.

COFFEE KITCHENS:

- ► Coffee is \$0.25 per cup or \$5.00/month for Coffee Club members. Per cup payments can be left in the coin boxes in the coffee kitchens. Call Administrative Services @ x1440 to join the Coffee Club.
- ▶ When there is a coffee supply shortage, please report it to Administrative Services @ x1440. You may borrow supplies from another coffee kitchen if necessary, but be courteous enough not to completely deplete the other kitchen's stock.

COPY PAPER:

- Fill out Colored Paper Requisition.
- ► Call Facilities @ x1440 to report what kind of paper is needed, where the requisition can be picked up, and where to deliver the paper. See Purchasing to order paper not listed on the Colored Paper Requisition.

COURIERS:

- Prepare package as if you were mailing it plus include a phone number.
- ► Take package to Security Desk and tell them it's a courier package.
- ► Call Administrative Services @ x1440 and give account to charge, name/address/phone of the recipient, and desired type of service and delivery time. If no answer, call x1499, x1498 or x1084. Do not leave a message for Priority Service.
- For the metro area, Regular delivery is usually within 3 hours. Anything else is Priority and has a \$10 surcharge for the MD, DC, VA metro area. Packages can usually be delivered within 1.5 hours with Priority Service.
- ► Following is the contact information of the courier in case you can't reach anyone at the above numbers and need to place a Priority Service courier request. In addition, please leave the above info on x1440 so that we will be able to reconcile the invoice with our courier log.

Courier Service - AAA Courier Phone Number - 703-256-7300 NRA Account # - 1440

DESK KEYS:

► Call Administrative Services @ x1440 with lock number.

FITNESS ROOM PROBLEMS:

Call Facilities @ x1499 to report any equipment problem.

FURNITURE REQUESTS:

► There is a limited amount of furniture available for NRA use. Check with Facilities @ x1499 or X1440 when

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a need arises. If the particular item is not available, see Purchasing to order.

LIGHTS OUT:

► Call Facilities at x1440 or X1499 and give location and type of light.

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NAMEPLATES:

Nameplates usually take two weeks for delivery. To order, send an e-mail to Cindy Whitley in Administrative Services with the name of the person and the account to charge.

PAPER RECYCLING:

- There is a small gray recycling bin at each desk for recycling paper materials. It is the responsibility of each employee to empty his/her own recycling bin into the large recycling bins located in the work rooms or copier rooms in each department. The large bins will be emptied by the night cleaning crew.
- Acceptable Items
 - Paper: White, Colored, Computer, Newspaper, Coated, Embossed, Facsimile, Blueprints, Carbonless (NCR), Copy, Self-Adhesive, and Brown Kraft Bags
 - Envelopes: Regular, With Windows, Colored or Coated
 - Miscellaneous: Brochures, Greeting Cards, Magazines, Pamphlets, Corrugated Cardboard (any color), Paperboard, and Posters.
- Unacceptable Items
 - Paper Food Receptacles: Paper Plates, Cups, Napkins, Cake Boxes, Pizza Boxes, Candy Wrappers, Lunch Bags, and Waxed Paper
 - Miscellaneous: Brown Mailing Envelopes and File Folders (They can't be bleached, and therefore cannot be recycled.), and Carbon Paper

ROOM KEYS:

Send an e-mail to Beth Donaldson with the following information: Who the key is for, room number, number of copies, who the key should be delivered to.

ROOM RESERVATIONS:

- ► See Meeting Facilities Guide on the Facilities Bulletin Board on Outlook for contact person.
- ▶ Adhere to the following guidelines:
 - 1. Reserve the room as far in advance as possible.
 - 2. Allow for your own set-up and tear-down time in your reservation.
 - 3. Call and cancel the reservation if not needed.
 - 4. Vacate the room at the scheduled time.
 - 5. Leave the room in good condition for the next person's use. Papers, equipment, food, etc. shall not be left in a conference room.
 - Contact the following staff members for specific help.
 Audio Visual Equipment Audio Visual Production Manager
 Food Service -Office Assistant/Catering Coordinator
 Room Set-Up Facilities

TEMPERATURE CHANGES:

- ► Call Facilities @ x1499 with your room number and the particular problem. While we will attempt to maintain an optimum temperature range of 72-76 degrees, we will not be able to accommodate requests for temperatures that are significantly out of this range.
- Requests for heating or air conditioning after business hours or on the weekend will only be accepted from directors/assistants and above.

WORK ORDERS:

Any requests for minor construction, furniture assembly, painting, repairs, picture hanging, etc. should be routed through Facilities @ x1499 Manager, Facilities via e-mail. You will be charged for the materials required for the project so be sure to provide an account number. You will be given an estimate of the cost of

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the project as well as a projected start date.

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NATIONAL RIFLE ASSOCIATION SHIPPING GUIDELINES

These Standard Operating Procedures are established as guidelines for employees in order for the NRA Mail Room to efficiently process numerous outgoing letters and packages daily.

NRA Mail Room: This department assumes responsibility for the processing of all outgoing **"official business"** mail to include but not to be limited to, First Class, Priority, Certified, Express, Registered, Air Mail, Air Parcel Post, Media, UPS, Federal Express and Freight. Listed below are schedules of time frames and special requirements for the different types of services offered.

UNITED STATES POSTAL SERVICE

FIRST CLASS MAIL: First Class mail must have a label affixed to it that includes a destination and return address. Any flat-size mail piece must be stamped with first class, media, etc. The machine that the Mail Room uses to process the mail has the capability of sealing the regular #10 first class envelopes only. Flaps must be folded over rather than nested (sticking up). Please make sure to seal all other flat mail. For a mail piece with a bound or folded edge use tabs, wafer seals, cellophane tape or permanent glue (continuous or spot) to seal. The seal must not interfere with the delivery or return address, rate markings, barcode or postage information. See Exhibit A for placement of tabs and wafer seals. Staples and saddle stitching may be used only on booklet type mail pieces to join the bound edge (spine).

INTERNATIONAL MAIL: All foreign mail must be marked **AIR MAIL.** Make sure to put the name of the destination country on the package. This is very important for fast service. Employees must complete Customs' forms for mail pieces weighing more than 13 ounces. To complete International or APO forms go to http://webapps.usps.com/customsforms/.

EXPRESS, CERTIFIED AND REGISTERED MAIL: Express, Certified and Registered Mail must be delivered to the Mail Room with the requisite forms by 4:00 p.m. if it is to go out that day. We make a daily trip at 4:05 p.m. to the Post Office for this purpose. When sending Express Mail, do not remove any copies of the label. The Post Office will not accept Express Mail that is missing copies of the label.

SCHEDULE: The Mail Room provides two inter-departmental pickups per day, morning and afternoon. Each department has a copy of its schedule. When dropping mail in the Mail Room, please write or stamp an account number on one envelope (when there is more than one) on the upper left corner, underneath the return address. The United States Postal Service has two scheduled pickups per day: 11:30 a.m. and 4:15 p.m. Mail brought after 4:15 p.m. will not go to the Post Office until the next morning. The pick-up for the blue drop box located outside the rear north lobby doors is 11:45 a.m.

NOTE: A tray or basket is assigned and placed accordingly for each department with the proper account number. It is not necessary for employees to write the account number on each envelope unless it is different from the one on the basket.

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UNITED PARCEL SERVICE (UPS)

Each package to be shipped via UPS **must** be accompanied by a copy of the original label with the following information: recipient's name, complete address (street, city, state and zip code), postage account number, your extension (if we have any questions) and the type of service wanted (see choices below). Print clearly or type the labels to avoid confusion or errors as we have to input the information into the UPS computer system. See Exhibit B for an example of a completed UPS label. UPS will deliver packages addressed to P.O. Boxes; however there will be a service charge (\$15) for looking up the street address.

UPS SERVICES: There are a variety of convenient services available from UPS. Select one of the following services on your label.

- ► Same Day UPS SonicAir: This service offers guaranteed delivery to metro areas coast to coast in a matter of hours. For more information on this service call x1433.
- ► Overnight Early A.M.: Guaranteed delivery to major U.S. cities by 8:00 a.m., most others by 8:30 a.m. weekdays, 9:00 a.m. Saturdays.
- Overnight Next Day Air: Guaranteed delivery to every address coast to coast and Puerto Rico by 10:30 a.m., Noon, or End of Day. Saturday delivery also available.
- ► Overnight Next Day Air Saver: Business to business guaranteed overnight delivery by 3:00 p.m. to the 48 contiguous states. (Residential deliveries are guaranteed by end of day.)
- ▶ 2nd Business Day by Noon: Business-to-business guaranteed delivery by noon on the second business day throughout the 48 contiguous states.
- ▶ 2nd Business Day by End of Day: Time definite and economical, guaranteed delivery by end of the second business day throughout the U.S. and Puerto Rico.
- ▶ 3 Day Select: Economical, guaranteed delivery by the third business day to anywhere in the 48 contiguous states. No time frame guarantees are offered with this service.
- ► Ground: Combines reliable UPS ground service with state-of-the-art package tracking for shipments to and from any address in the 50 contiguous states. No time frame guarantees are offered with this service.
- ▶ UPS service to Hawaii and Alaska overnight or second day takes one extra day for delivery.

INSURANCE: Unless a greater value is declared in writing on the label, the released value for each package or article covered by UPS is \$100.00. For each package with a declared value more than \$100.00, an additional \$0.75 is charged for each additional \$100.00 or fraction thereof, with a minimum charge of \$2.25. Make sure to indicate the correct amount of insurance you want for your package.

RATES: UPS rates vary according to distance (zone), weight and service. For information on specific rates call x1433 or x1436. An additional charge \$15.00 applies for each letter or package delivered on a Saturday. Commercial or business rates are lower than residential. Let the Mail Room staff know if your package is commercial or residential.

SCHEDULE: Packages to be shipped via UPS must be in the Mail Room by 3:00 p.m. for processing.

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FEDERAL EXPRESS (FedEx)

To ship FedEx, complete the labels print clearly or type the labels making sure all the information you are entering is legible on the copy as well. Enter your department's postage account number in the "Reference Information" block on the PowerShip label or in the section marked "Your Internal Reference Billing Information" on the carbon-type label. Please remember FedEx **does not** deliver to P.O. Boxes.

POWERSHIP LABELS: The FedEx PowerShip system enables the NRA Mail Room to track envelopes and packages or shipments through the FedEx computer system. FedEx no longer requires us to use the PowerShip label as their new system will generate a label. However, we do require you to bring a label with each package so that we can enter the information into the computer. You may use the generic shipping label that is used for UPS, or you can continue to use the PowerShip labels until we run out of them. Do not affix your label to the package as the system will generate a new one. Please be aware that with the new system, the computer will generate a tracking number for each package which will not match the one on your PowerShip label. Please remember that we always need the postage account number to charge, extension, and the person's name who is sending the package. If using the PowerShip label, the account number goes in the "Reference Info" box, and your name goes underneath the pre-printed NRA address. Do not use the PowerShip label or the generic shipping label for packages which are being left in a drop-box. You must use the Air-Bill or a Passkey label for those shipments.

AIR BILL LABELS: These labels are to be used only after hours or in the event that you need to ship something and use a drop-box. When using a drop-box, make sure to use the FedEx Letter, FedEx Pak or small boxes. The package must fit into the drop box. It is very important that you enter your postage account number and name on the Air Bill and give the Sender's Copy to the Mail Room Manager. Do not use any other type of label on packages being left in a drop-box.

FEDEX SERVICES: Make sure to select one of the following services when you complete the proper label.

- FedEx Same day: FedEx can rush your urgent shipments (up to 70 lbs. per package) the same day to virtually any U.S. destination, depending on availability. To request this service call x1433.
- ► FedEx First Overnight: This service offers guaranteed delivery by 8:00 a.m. to 90 major U.S. cities (not available in Hawaii).
- ► FedEx Priority Overnight: Time-definite delivery by 10:30 a.m. the next business day to thousands of U.S. markets and by noon to most other areas.
- FedEx Standard Overnight: Delivery by 3:00 p.m. the next business day to thousands of U.S. cities and by 4:30 p.m. to most other areas.
- FedEx 2 Day: Delivery by 4:30 p.m. the second business day within the continental U.S. Delivery can occur up to 7:00 p.m. for residential deliveries to homes or private residences, including home offices.
- ► FedEx Express Saver offers a delivery commitment of three business days, regardless of the origin and destination of your shipment.
- ► For Saturday Delivery call Mail Room staff with the zip code to verify service to that destination.
- ▶ Note: The NRA does **not** have a discount for First Overnight Service.

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INSURANCE: FedEx liability with regard to any package is limited to the sum of \$100.00 unless a higher value is declared on the AIR BILL for the package at time of tender. A \$2.25 minimum charge will be assessed for all shipments exceeding \$100.00 in declared value. For shipments exceeding \$500.00 in declared value, an additional \$0.75 will be charged for each \$100.00 (or fraction thereof) of declared value. Declared value must be entered in whole dollar amounts. The maximum declared value is \$25,000.00 per package and \$500.00 per letter.

RATES: FedEx rates are calculated according to distance (zone), weight and service. For information on FedEx rates, call x1433 with the destination zip code and let us know if it is commercial or residential.

SCHEDULE: Packages to be shipped via FedEx must be in the Mail Room by 4:15 p.m.

FREIGHT SHIPMENTS

A two-day advance notice must be given to the Mail Room Manager in order to use this service.

PERSONAL PACKAGES

The Mail Room provides shipping of personal packages as a service to NRA employees. Packages can be shipped via USPS, FedEx or UPS. Please follow the same procedures as mentioned above. Payments must be made to NRA by cash or check at the time packages are dropped off at the Mail Room. If additional charges are incurred due to wrong address, oversized boxes or any other reason, the employee will be responsible for paying for the extra charge. This payment is due within 48 hours of notification. If payment is not received within this time frame, future services will be denied.

To receive personal packages at work, you must first notify the Mail Room Staff that you are expecting a personal package. When it arrives, they will notify you that the package has arrived. You must remove the package from the Mail Room within 24 hours of receipt.

NOTES

- 1. You cannot send items addressed to P.O. Boxes through FedEx. UPS will deliver packages addressed to P.O. Boxes, but will charge a fee (\$15.00) for looking up the street address. The USPS is the only service that will deliver directly to P.O. Boxes.
- 2. Please don't seal boxes if the contents are fragile, (glass, mirror, frames, etc.,) hollow or rattling, especially if you don't have enough packing material around the item. If you seal your box, make sure not to put tape on the upper right corner.
- 3. When using FedEx or UPS drop boxes, make sure to fill in your "department postage account number" and send a copy of the Air Bill to the Mail Room Manager. This is very important for billing purposes and problem resolution.

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4. The Mail Room does not have a license or the capability to ship Hazardous Materials.

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National Rifle Association of America Procurement Policy (Effective 1/7/06)

Purpose - Mission and Goals

This Purchasing Policy provides general policy guidance for efficient and cost effective procurement of goods and services necessary to support the goals, objectives and work of the Association while ensuring Association resources are protected and maximized. The goal of the Policy is to provide a system that delivers reasonably priced, high-quality goods and services to end users, while preserving organizational, financial and ethical responsibility.

This Policy and the detailed Purchasing Procedures Manual are and shall be based on the appropriate and applicable policies, procedures and standards developed and recommended by the Institute for Supply Management and Accounting Best Practices.

The underlying guidelines for this Policy are:

- 1. To provide for the furtherance of NRA's mission in the most timely, efficient, controlled and ethical manner possible,
- 2. To procure quality goods and services at the best price and terms possible,
- 3. To provide for free and open competition wherever possible, while providing guidelines for sole source procurement when necessary,
- 4. To provide for standardization of common materials and supplies among divisions to maximize purchasing efficiencies and economies, and
- 5. To provide guidance governing contracts related to the use of Association trademarks, licensing of the Association's name, and affinity relationships.

Contracts and policies related to employment matters, grants or loans to affiliated organizations, and acceptance of endowment or other conditional gifts to the Association are not covered under this Policy and are covered under other policies of the Association.

A detailed Purchasing Procedures Manual, based on this NRA Purchasing Policy, will be maintained by the Treasurer and Director of Purchasing. The Procedures Manual will include, but not be limited to, reporting and authorization levels, budget responsibility, detailed competitive bidding procedures, and general operational procedures. Special procedures for procuring printed matter, paper, professional and consulting services, computer hardware and software, capital items, leases and any other items determined to require unique or special procedures will be set forth in the Procedures Manual.

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Standards of Conduct and Ethical Guidelines

It is the intent and goal of the Association to uphold the highest standards of ethical behavior. As a membership non-profit organization we have a responsibility to our members and to the public service objectives of our organization to obtain the maximum value for each dollar of expenditure and to do so in a professional and ethical manner.

In doing so, the employees, officers and Board of Directors (Directors) of the Association will adhere to the following principles and standards:

- 1. Give first consideration to the objectives and policies of the Association.
- 2. Ethical business standards shall govern all procurement transactions. Independence of judgment from vendors, contractors, suppliers and others must be maintained.
- 3. Significant gifts, including but not limited to, any item, service, favor, monies, credits or discounts not available to others may not be part of any purchasing decision or appear to influence any such decision.
- 4. Grant competitive suppliers/vendors equal consideration.
- 5. Conduct business with potential and current vendors in an atmosphere of good faith, devoid of intentional or negligent misrepresentation.
- 6. Make every effort to negotiate equitable and mutually agreeable contracts with suppliers.
- 7. Foster fair, ethical and legal trade practices.
- 8. Work on behalf of the interests of the Association solely and avoid situations that may result in personal benefit or gain.

In addition, the NRA Statement of Corporate Ethics, attached hereto as Exhibit A, should be adhered to in all purchasing decisions.

Relationships with customers, manufacturers, suppliers, competitors, and employees are to be based on fair dealing, on fair competition in quality, price and service, and on compliance with applicable laws and regulations, and this Policy.

Conflict of Interest

NRA's reputation for impartiality and objectivity, as well as sound business practice, requires that employees, officers and Directors not make decisions for the Association if their personal economic interests are directly affected by the outcome.

Conflicts of interest occur when the purchaser is in a position to make or influence a procurement decision from which they might directly or indirectly receive financial or personal benefit.

Employees, officers and Directors shall not use their position with the Association in a manner that may create a conflict, or the appearance of a conflict, between the individual's personal interest and those of the Association.

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All activities conducted as employees, officers or Directors of the Association shall always place the lawful and legitimate interests of the Association first.

Association employees, officers or Directors shall faithfully discharge their duties and shall refrain from knowingly engaging in any outside matters of financial interest incompatible with the impartial, objective, and effective performance of their duties. They shall not realize personal gain in any form that would influence improperly the conduct of their Association duties. They shall not knowingly use Association property, funds, position or power for personal or political gain.

Buyers and users in a position to influence an Association acquisition decision for which they might receive material benefit are required to disclose the nature of conflict to those involved in the purchasing activity. Whenever possible, those with potential conflicts should remove themselves from the process. Disclosure of conflicts of interests shall be made in accordance with the National Rifle Association Statement of Corporate Ethics as specified in the Purchasing Procedures Manual.

Related Party Transactions

Related party transactions are transactions conducted with an individual or vendor that is related to an employee, officer or Director of the Association. A related party is defined as any person bearing a relation to the employee, officer or Director of the Association, including any members of the employee's immediate family, including but not limited to, spouse, parents, children, siblings, mothers and fathers-in-law, sons and daughters-in-law, brothers and sisters-in-law, and non-employee members of the same household.

Absent written authorization by the Association, no employee, officer or Director shall be affiliated with any vendor or provider of goods or services to the Association. Such affiliation generally is inconsistent with the individual's capacity to deal equitably with all buyers and to discharge his or her responsibilities to the Association.

Disclosure is required for direct and indirect related party transactions. Detailed disclosure guidelines are outlined in the Purchasing Procedures Manual.

Policy Violations

Anyone who suspects violations of this code has an obligation to report their concerns to their immediate supervisor, the Office of the Treasurer, the Audit Committee Chairman or NRA's General Counsel.

Matters of concern include pressure exerted by manufacturers, customers, Association staff, or others to utilize funds in an unauthorized manner or to take or enable other actions inconsistent with authorized Association procedures and policies.

All allegations of improper or illegal behavior will be investigated promptly and thoroughly. The investigation shall remain as confidential as practicable and those conducting the investigation shall respect the privacy of all persons involved.

No adverse action shall be taken or permitted against anyone for communicating legitimate concerns to the appropriate persons. However, malicious and unfounded accusations will not be tolerated and will be dealt with accordingly.

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Purchasing Management

Purchasing authority is delegated by the Board of Directors through the Executive Vice President and the Officers of the Association to the Treasurer and the Purchasing Division.

The Purchasing Division shall be responsible for the overall procurement operations of NRA. The function of the Purchasing Division is the management and administration of centralized purchasing services for all departments of the Association. In providing these services and in accordance with sound business practices, the Purchasing Division seeks to realize the maximum value for every dollar expended.

The Purchasing Division's goals and objectives include:

- 1. Develop and execute appropriate competitive bidding procedures.
- 2. Secure competitive bids to obtain maximum value from Association expenditures.
- 3. Identify, develop and formally qualify vendors for sources of supplies and equipment on a sole source basis as necessary or appropriate.
- 4. Maintain liaison with the vendors that provide goods and services to the Association.
- 5. Negotiate and oversee Association-wide purchasing agreements, including just-in-time suppliers for appropriate categories of products.
- 6. Monitor buying patterns and negotiate volume purchasing agreements that utilize the buying power of the entire organization.
- 7. Coordinate legal review through the General Counsel's Office, as appropriate.

Coordinating purchasing activity through the Purchasing Division is required at all times. However, individual departments may be granted authority to purchase goods and services with the prior written approval of the Purchasing Division. The Division/Department will have input and participate in the identification of vendors for the goods or services desired.

The Purchasing Division will strive to provide flexibility to departments to take care of their basic and continuing support requirements in an efficient and timely manner, but at the same time take full advantage of the benefits of centralized purchasing and volume discounting.

The Purchasing Division will randomly review each department's purchasing transactions. Any inappropriate purchases will be identified, evaluated and resolved.

Agent Purchases

NRA has relationships with vendors that act as our agent to coordinate or manage activities such as membership promotions and public relations.

No vendor shall be permitted to purchase items on the NRA's behalf without prior written approval. The Purchasing Division and the appropriate Division manager or director shall review and approve all aspects of the product selection, trademark usage and volume or amount purchased prior to the agent committing to the purchase.

Violations of this Policy shall constitute cause for terminating the contract with said vendor.

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Information Services Responsibilities

The Information Services Division is the point of contact for *all* contracts and purchases related to computer hardware and software or other information technology. The IS Division must be consulted on all technology projects even in the case of outsourcing <u>prior</u> to formalizing a commitment in order to ensure proper interface with existing systems and/or programs.

Contract signatory authority is delegated by the Treasurer to the Director of Information Services. The Information Services Division reviews, obtains General Counsel's review, and signs all contracts for computer hardware and software, including those contracts for testing and maintenance agreements. Contracts are also subject to the Contracts and Approval Authority guidelines outlined in this Policy.

The Information Services Division will coordinate all purchasing activity with the Purchasing Division including providing purchasing activity reports to the Purchasing Division as necessary to capture and evaluate Association spending trends.

Competitive Bidding

NRA will make every effort to maximize competitive procurement opportunities by soliciting competitive bids and proposals for goods and services.

Competitive Threshold

Buyers and users are required to solicit competitive bids/pricing for goods or services valued at or above \$5,000. The bidding process shall include pricing, product quality and the ability of the vendor to complete the procurement process according to the terms of the purchase order. All non-competitive acquisitions at or above the competitive thresholds must be adequately and appropriately justified and documented.

Request for Proposals (RFPs)

Request for Proposals are issued when competitive bidding is not appropriate, the specifications or scope of work is complex and/or when subjective factors, other than price, are to be used in the evaluation for selection.

A Request for Proposal must be conducted on all purchases equal to or above \$100,000.

Preferred Supplier Directory

The Purchasing Division will maintain a listing of qualified suppliers/vendors that have already undergone the competitive bidding and supporting documentation process. Competitive bidding will be conducted on a regular schedule not to exceed every 5 years.

Sole Source Purchases

Certain purchases qualify for sole source based on the unique requirements of the order or the nature of the goods or services being provided. These purchases may be treated as exceptions to normal bidding procedures. Documentation stipulating the reason for the sole source purchase must be approved by the Director of Purchasing *prior to making a purchasing commitment*.

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Exceptions

Purchases or services directly related to legal counsel, political strategy, public relations, membership, fundraising and marketing may be selected using means other than a competitive bid solicitation at the discretion of the Executive Vice President. Testing of goods and services in lieu of a competitive bid or RFP shall be utilized when appropriate. Any contracts or Association business awarded in this capacity shall be reported to Finance Committee on an annual basis.

Vendor Affiliations

The Association will avoid using vendors that are involved in anti-gun affiliations or alliances through contributions or public advocacy for anti-gun measures. Employees and officers will inquire into a vendor's participation in such affiliations and relationships in connection with the competitive bid process.

Compliance

The Purchasing Division and the Office of the Treasurer are responsible for ensuring compliance with the competitive bid policy, for awarding contracts and purchase orders, and for maintaining all related procurement records.

Contracts and Approval Authority

Contracts shall be used in conjunction with or in lieu of purchase orders, in accordance with the following guidelines:

- 1. All contracts requiring payments equal to or greater than \$100,000 in any twelve month period, must have written approval of:
 - a. the appropriate Division Director and
 - b. the Executive Vice President and
 - c. the Treasurer.

The signature of the President and one of the Vice Presidents is also required as written acknowledgement of the contract/commitment.

- 2. Contracts equal to or greater than \$50,000 and up to \$100,000 require the approval of:
 - a. the appropriate Division Director and
 - b. one Officer (EVP, Executive Director-ILA, Executive Director GO, Treasurer or Secretary)
- 3. Contracts under \$50,000 require the approval of the Division Director or his/her staff designated with such authority.
- 4. Expenses routinely incurred in the ordinary course of business on a periodic, recurring basis (such as paper, postage, mail production expenses, and other contractual services) are exempt from the requirements above, provided that the President, Vice Presidents and Finance Committee are furnished annually, with the budget submission, a listing and description of, including estimated amounts and names of vendors, agreements and contracts which the Treasurer deems to be subject to this exemption.

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Legal and Regulatory

Agreements for annual or recurring purchases and all contracts shall be reviewed and approved by the Office of the General Counsel in accordance with the Purchasing Procedures Manual guidelines.

If a relationship with the vendor involves use of NRA's trademarks or logos, licensing of the Association's name, or other proprietary matter of the NRA, the Office of the Secretary and the Intellectual Property Rights Committee must give *prior* approval for the activities involving such.

In conducting purchasing activities, the NRA will seek to fulfill its role as a good corporate citizen by adhering to all related laws and regulations.

Confidentiality

Association employees, officers or Directors are responsible for maintaining the confidentiality of proprietary information of the Association and information entrusted to the Association by customers/vendors/suppliers that is otherwise not readily available to the public.

Signed confidentiality agreements are required prior to any purchasing activity involving proprietary information.

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The National Rifle Association

Emergency Evacuation Plans for Headquarters Employees

This plan is intended to provide direction for employees and visitors at the NRA Building in the event of emergency situations, including:

- Fire or Other Evacuation
- Power Outage

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- Severe Storm
- Protest/Pickets

The NRA evacuation Plan utilizes a "Floor Warden" system to assure:

- Complete evacuation,
- Headcounts at designated gathering point, and
- Appropriate communications to employees and visitors

We will assign a Floor Wardens (and backups) for each floor of each tower and for each atrium levels between the towers. Floor Wardens and their backups will be trained annually in these procedures and will then train all employees in their area of responsibility. This training will also be accomplished during new hire orientations. Tenant organizations should designate their own wardens and backups.

Fire Emergency or other Evacuation

In the event of a fire, the alarm will be activated, Emergency Lighting will automatically turn on and all employees will immediately evacuate the building, moving to the Southeast corner of the front parking lot. Always consider an alarm to be the "real thing". Don't make phone calls to Security, simply evacuate.

We will hold at least one planned, pre-announced drill each year. Fire and rescue units will be invited to observe and make recommendations.

The alarm bell system at the NRA Headquarters, when activated, can be heard throughout the building. The alarm can be activated:

- Manually by Security,
- By pull stations located on the second floor
- By various sensors in the system located throughout the building

NYSCEF DOC. NO. 1304 RECEIVED NYSCEF: 03/06/2023

Evacuation Process when an Alarm sounds:

- Whenever the alarm is activated all persons will immediately evacuate the building, using the stairwells from upper floors, and will exit the building from the front doors or the nearest exit, moving to the Southeast corner of the front parking lot. (See attached diagram). Always assist those who cannot or who have difficulty walking.
- Employees and visitors who are on the Range when the alarm is activated will immediately clear their weapons and evacuate to the front parking lot using the side driveway to come around the building rather than going up through the front parking lot levels. Range Officers will serve as Wardens and will direct the evacuation from the Range. (Firearms can be secured at the Security Command Post in the Southwest corner of the front parking lot.)
- Once you are in front of the building, find your appointed Floor Warden who will be holding up a sign indicating the tower and floor where you work. (For example, 2nd Floor – South Tower). Employees from each area will gather together with their managers near the Floor Warden for head count.
- Mangers are responsible for taking a head count of their employees and visitors and for advising their respective Floor Warden if someone cannot be accounted for. Floor Wardens will pass this information to Security. Security will pass this information to Rescue Personnel for Proper response. Please remain in you group after your Floor Warden has accounted for everyone.
- For safety reasons, please remain at the Southeast corner of the front parking lot, in your work group, until the all clear is given by security, or until you are given other instructions.
- Personnel trained in First Aid and a First Aid Responder Bag will be located in the Southeast corner of the front parking lot.

TIPS Do not panic. Do not run. Do not phone Security to see if it is "the real thing." Do help others. Do listen to Floor Wardens instructions. Do evacuate immediately.

- Do not try to use elevators to evacuate the building from the upper floors, please use the stairs instead. When the alarm sounds, the elevators will immediately travel to the first floor and the doors will open. The elevators will then be nonfunctional until the system is reset or the generator powers up, the one elevator will function, primarily for use by Emergency Personnel. However, in emergency situations it is not a good idea to use the elevators unless absolutely necessary.
- If speaking on the phone when the alarm is activated, courteously inform the other party that an alarm has sounded and that you will return the call as soon as possible. Don't continue your conversation. Your job, at that point, is to immediately evacuate the building.
- If the weather outside is bad, if possible grab a coat or umbrella on your way out. Please remember, in a real situation, every second counts.
- If working on a computer when the alarm is activated, quickly save your work and begin evacuating the building.

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• Please escort visitors out of the building to the gathering point.

- During a fire situation, the smoke generated can be a major hazard. If there is smoke present, cover your mouth and nose with fabric and stay low to avoid inhaling smoke as much as possible while evacuating the building. Always check doors for heat prior to opening them in a fire situation. Do not use a stairwell which is filled with smoke; find an alternate means of escape, if possible.
- Emergency lighting will automatically turn on when the alarm is activated. The building has sufficient emergency lighting for us to see our way out.
- Since Fire and Rescue Units will be moving into the driveway in an emergency situation, it is important that all employees <u>remain</u> in the Southeast corner of the front parking lot, with their group for safety reasons. Do not go to your vehicle and do not leave the designated gathering area unless instructed to do so.
- Security will be primary contact with responding Emergency Units. All others should stay with their group and Floor Warden
- Representatives of the media are usually attracted by this kind of activity and will try to get information from anyone who will talk with them. Do not speak with members of the media about the situation, but, instead, direct them to the media check point. An authorized spokesperson will see them once the evaluation of the situation has been made.
- The NRA Media Committee will be composed of the NRA Executives who are on-site at the time of an emergency. They will be briefed by Security as soon as a situation appraisal has been completed. Only members of the Media Committee are authorized to release information to the media.

Power Outages

The generator will be activated in the event of a power outage. Emergency lighting also automatically turns on and is intended only to provide sufficient lighting for people to evacuate the building. Security will activate the alarm if evacuation is necessary. If the alarm sounds, all employees will immediately evacuate the building and move to the Southwest corner of the front parking lot.

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Severe Storm

In the even of a Severe Storm with extremely high winds, or tornado, the National Weather Service advises that you should not go outdoors or take shelter in a car. Seeking shelter in internal rooms, hallways or a basement where you are not exposed to exterior glass is recommended.

- The warning will be passed by word of mouth and by phone message through Floor Wardens to all employees if time permits.
- Employees and visitors will take shelter in the internal spaces that are not exposed to exterior glass, and remain there until the all-clear is given.
- Should you be caught outside during a tornado, the National Weather Service advises you should lie down in a ditch, a gutter or other depression in the ground and remain there until the storm has passed. It is not advisable to seek shelter in cars since they are many times tossed around in such a storm.

Protest/Pickets

Like many organizations, the NRA is a potential target for protesters and pickets. Should this activity occur during working hours, we will not evacuate the building, but will keep employees informed of the situation.

- If you learn of a protest or picket situation before departing for work, or on the way to work, call the NRA Emergency Hot Line at (703) 267-1010 for instructions.
- Do not interact with protesters/picketers while trying to access the front parking lot. Do not try to run through the protest/picket lines with a car. If you are not allowed through the lines, find a phone and call in for instructions on the NRA Emergency Hot Line (703) 267-1010.
- Access to the facility will only be available with security passes in these situations.

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The National Rifle Association

Emergency Evacuation Plans for NRA-ILA, Sacramento, CA

This plan is intended to provide direction for employees and visitors at the NRA-ILA Building in the event of emergency situations, including:

- Fire or Other Evacuation
- Severe Storm

NYSCEF DOC. NO. 1304

Protest/Pickets

The NRA-ILA evacuation Plan utilizes a Floor Warden system to assure:

- Complete evacuation,
- Headcounts at designated gathering point, and
- Appropriate communications to employees and visitors

Floor Wardens (and backups) have been assigned for the suite floor. Floor Wardens and their backups will be trained annually in these procedures and will then train all employees in their area of responsibility. This training will also be accomplished during new hire orientations.

Fire Emergency or other Evacuation

In the event of a fire, the alarm will be activated, Emergency Lighting will automatically turn on and all employees will immediately evacuate the building, moving to the back parking lot. Always consider an alarm to be the "real thing". Don't make phone calls to Security, simply evacuate.

We will hold at least one planned, pre-announced drill each year. Fire and rescue units will be invited to observe and make recommendations.

The alarm bell system at the NRA-ILA Building, when activated, can be heard throughout the building. The alarm can be activated:

- Manually by Security,
- By pull stations located on the second floor
- By various sensors in the system located throughout the suite

NYSCEF DOC. NO. 1304 RECEIVED NYSCEF: 03/06/2023

Evacuation Process when an Alarm sounds:

- Whenever the alarm is activated all persons will immediately evacuate the building, using the stairwells from upper floors, and will exit the building from the front doors or the nearest exit, moving to the back parking lot. (See attached diagram). Always assist those who cannot or who have difficulty walking.
- Once you are in front of the building, find your appointed Floor Warden who will be holding up a sign indicating the building and floor where you work. (For example, ILA - 6th Floor). Employees will gather together with their managers near the Floor Warden for head count.
- Mangers are responsible for taking a head count of their employees and visitors and for advising their respective Floor Warden if someone cannot be accounted for. Floor Wardens will pass this information to Security. Security will pass this information to Rescue Personnel for Proper response. Please remain in you group after your Floor Warden has accounted for everyone.
- For safety reasons, please remain at the back parking lot, in your work group, until the all clear is given by security, or until you are given other instructions.
- Personnel trained in First Aid and a First Aid Responder Bag will be located in the back parking lot.

TIPS Do not panic. Do not run. Do not phone Security to see if it is "the real thing". Do help others. Do listen to Floor Wardens instructions. Do evacuate immediately.

- Do not try to use elevators to evacuate the building from the 6th floor, please use the stairs instead. When the alarm sounds, the elevators will immediately travel to the first floor and the doors will open. The elevators will then be nonfunctional until the system is reset or the generator powers up, the one elevator will function, primarily for use by Emergency Personnel. However, in emergency situations it is not a good idea to use the elevators unless absolutely necessary.
- If speaking on the phone when the alarm is activated, courteously inform the other party that an alarm has sounded and that you will return the call as soon as possible. Don't continue your conversation. Your job, at that point, is to immediately evacuate the building.
- If the weather outside is bad, if possible grab a coat or umbrella on your way out. Please remember, in a real situation, every second counts.
- If working on a computer when the alarm is activated, quickly save your work and begin evacuating the building.
- Please escort visitors out of the building to the gathering point.
- During a fire situation, the smoke generated can be a major hazard. If there is smoke present, cover your mouth and nose with fabric and stay low to avoid inhaling smoke as much as possible while evacuating the building. Always check doors for heat prior to opening them in a fire situation. Do not use a stairwell which is filled with smoke; find an alternate means of escape, if possible.

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• Emergency lighting will automatically turn on when the alarm is activated. The building has sufficient emergency lighting for us to see our way out.

- Since Fire and Rescue Units will be moving into the alley in an emergency situation, it is important that all employees <u>remain</u> in the back parking lot, with their group for safety reasons. Do not go to your vehicle and do not leave the designated gathering area unless instructed to do so.
- Security will be primary contact with responding Emergency Units. All others should stay with their group and Floor Warden
- Representatives of the media are usually attracted by this kind of activity and will try to get information from anyone who will talk with them. Do not speak with members of the media about the situation, but, instead, direct them to the media check point. An authorized spokesperson will see them once the evaluation of the situation has been made.
- The NRA-ILA Media Committee will be composed of the ILA Executives who are on-site at the time of an emergency. They will be briefed by Security as soon as a situation appraisal has been completed. Only members of the Media Committee are authorized to release information to the media.

Severe Storm

In the even of a Severe Storm with extremely high winds, or tornado, the National Weather Service advises that you should not go outdoors or take shelter in a car. Seeking shelter in internal rooms, hallways or a basement where you are not exposed to exterior glass is recommended.

- The warning will be passed by word of mouth and by phone message through Floor Wardens to all employees if time permits.
- Employees and visitors will take shelter in the internal spaces that are not exposed to exterior glass, and remain there until the all-clear is given.
- Should you be caught outside during a tornado, the National Weather Service advises you should lie
 down in a ditch, a gutter or other depression in the ground and remain there until the storm has
 passed. It is not advisable to seek shelter in cars since they are many times tossed around in such a
 storm.

Protest/Pickets

NYSCEF DOC. NO. 1304

Like many organizations, the NRA-ILA is a potential target for protesters and pickets. Should this activity occur during working hours, we will not evacuate the building, but will keep employees informed of the situation.

- If you learn of a protest or picket situation before departing for work, or on the way to work, call the NRA Emergency Hot Line at (703) 267-1010 for instructions.
- Do not interact with protesters/picketers while trying to access the parking lot. Do not try to run through the protest/picket lines with a car. If you are not allowed through the lines, find a phone and call in for instructions on the NRA Emergency Hot Line (703) 267-1010.
- Access to the facility will only be available with security passes in these situations.

NRA-NYAG-00011094 NYAG-00030072

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The National Rifle Association

Emergency Evacuation Plans for NRA-ILA, DC Employees

This plan is intended to provide direction for employees and visitors at the NRA-ILA Building in the event of emergency situations, including:

- Fire or Other Evacuation
- Severe Storm

NYSCEF DOC.

Protest/Pickets

The NRA-ILA evacuation Plan utilizes a "Floor Warden" system to assure:

- Complete evacuation,
- Headcounts at designated gathering point, and
- Appropriate communications to employees and visitors

Floor Wardens (and backups) have been assigned for the suite floor. Floor Wardens and their backups will be trained annually in these procedures and will then train all employees in their area of responsibility. This training will also be accomplished during new hire orientations.

Fire Emergency or other Evacuation

In the event of a fire, the alarm will be activated, Emergency Lighting will automatically turn on and all employees will immediately evacuate the building, moving to the Southeast corner of 1st and E St. SE. Always consider an alarm to be the "real thing". Don't make phone calls to Security, simply evacuate.

We will hold at least one planned, pre-announced drill each year. Fire and rescue units will be invited to observe and make recommendations.

The alarm bell system at the NRA-ILA Building, when activated, can be heard throughout the building. The alarm can be activated:

- Manually by Security,
- By pull stations located on the second floor
- By various sensors in the system located throughout the suite

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Evacuation Process when an Alarm sounds:

NYSCEF DOC.

- Whenever the alarm is activated all persons will immediately evacuate the building, using the stairwells from upper floors, and will exit the building from the front doors or the nearest exit, moving to the Southeast corner of 1st and E St. SE. (See attached diagram). Always assist those who cannot or who have difficulty walking.
- Once you are in front of the building, find your appointed Floor Warden who will be holding up a sign indicating the building and floor where you work. (For example, ILA - 2nd Floor). Employees will gather together with their managers near the Floor Warden for head count.
- Mangers are responsible for taking a head count of their employees and visitors and for advising their respective Floor Warden if someone cannot be accounted for. Floor Wardens will pass this information to Security. Security will pass this information to Rescue Personnel for Proper response. Please remain in you group after your Floor Warden has accounted for everyone.
- For safety reasons, please remain at the Southeast corner of 1st and E St. SE, in your work group, until the all clear is given by security, or until you are given other instructions.
- Personnel trained in First Aid and a First Aid Responder Bag will be located in the Southeast corner of 1st and E St. SE.

TIPS Do not panic. Do not run. Do not phone Security to see if it is "the real thing." Do help others. Do listen to Floor Wardens instructions. Do evacuate immediately.

- Do not try to use elevators to evacuate the building from the 2nd floor, please use the stairs instead. When the alarm sounds, the elevators will immediately travel to the first floor and the doors will open. The elevators will then be nonfunctional until the system is reset or the generator powers up, the one elevator will function, primarily for use by Emergency Personnel. However, in emergency situations it is not a good idea to use the elevators unless absolutely necessary.
- If speaking on the phone when the alarm is activated, courteously inform the other party that an alarm has sounded and that you will return the call as soon as possible. Don't continue your conversation. Your job, at that point, is to immediately evacuate the building.
- If the weather outside is bad, if possible grab a coat or umbrella on your way out. Please remember, in a real situation, every second counts.
- If working on a computer when the alarm is activated, quickly save your work and begin evacuating the building.
- Please escort visitors out of the building to the gathering point.
- During a fire situation, the smoke generated can be a major hazard. If there is smoke present, cover your mouth and nose with fabric and stay low to avoid inhaling smoke as much as possible while evacuating the building. Always check doors for heat prior to opening them in a fire situation. Do not use a stairwell which is filled with smoke; find an alternate means of escape, if possible.

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• Emergency lighting will automatically turn on when the alarm is activated. The building has sufficient emergency lighting for us to see our way out.

- Since Fire and Rescue Units will be moving into the alley in an emergency situation, it is important that all employees <u>remain</u> in the Southeast corner of 1st and E St. SE, with their group for safety reasons. Do not go to your vehicle and do not leave the designated gathering area unless instructed to do so.
- Security will be primary contact with responding Emergency Units. All others should stay with their group and Floor Warden
- Representatives of the media are usually attracted by this kind of activity and will try to get information from anyone who will talk with them. Do not speak with members of the media about the situation, but, instead, direct them to the media check point. An authorized spokesperson will see them once the evaluation of the situation has been made.
- The NRA-ILA Media Committee will be composed of the ILA Executives who are on-site at the time of an emergency. They will be briefed by Security as soon as a situation appraisal has been completed. Only members of the Media Committee are authorized to release information to the media.

Severe Storm

In the even of a Severe Storm with extremely high winds, or tornado, the National Weather Service advises that you should not go outdoors or take shelter in a car. Seeking shelter in internal rooms, hallways or a basement where you are not exposed to exterior glass is recommended.

- The warning will be passed by word of mouth and by phone message through Floor Wardens to all employees if time permits.
- Employees and visitors will take shelter in the internal spaces that are not exposed to exterior glass, and remain there until the all-clear is given.
- Should you be caught outside during a tornado, the National Weather Service advises you should lie
 down in a ditch, a gutter or other depression in the ground and remain there until the storm has
 passed. It is not advisable to seek shelter in cars since they are many times tossed around in such a
 storm.

RECEIVED NYSCEF: 03/06/2023

Protest/Pickets

NYSCEF DOC. NO. 1304

Like many organizations, the NRA-ILA is a potential target for protesters and pickets. Should this activity occur during working hours, we will not evacuate the building, but will keep employees informed of the situation.

- If you learn of a protest or picket situation before departing for work, or on the way to work, call the NRA Emergency Hot Line at (703) 267-1010 for instructions.
- Do not interact with protesters/picketers while trying to access the parking lot. Do not try to run through the protest/picket lines with a car. If you are not allowed through the lines, find a phone and call in for instructions on the NRA Emergency Hot Line (703) 267-1010.
- Access to the facility will only be available with security passes in these situations.

NRA-NYAG-00011098