

# 2024 Associate Handbook

**Hilton**

**Marriott**

**IHG**

HOTELS & RESORTS

**MARGARITAVILLE**  
*Beach Resort*

**TPI**  
HOSPITALITY

*We serve others,  
to create win-win outcomes*



## **TPI HOSPITALITY 2024 ASSOCIATE HANDBOOK**

Each year, TPI will provide associates with a summary of all Associate Handbook updates. To assure clear understanding of expectations, all associates are required to review the Associate Handbook updates and sign an acknowledgement form (*appendix form 1.01*) indicating their understanding of any policy revisions.



### **VISION STATEMENT**

*"Whatever it takes. YOU have the power!"*

### **COMPANY PURPOSE**

*"We serve others to create win-win outcomes."*

### **MISSION STATEMENT**

*"Through delivery, marketing, development and maintenance of competitively superior products and guest services, and by creating motivating work environments, it is the mission of TPI Hospitality to achieve the maximum return on investment attainable. By accomplishing this, not only will TPI Hospitality be a financially stable employer, but it will be postured to capitalize on good opportunities for growth as they become available."*

### **WE ARE A TEAM**

You will find important information on our company intranet website located at <https://weareateam.tpihospitality.com>. The User Name is TEAM. The Password is TPITEAM. These items include our newsletters, details on benefits, the OZ Principle slideshow, schedules, directories, announcements and more.

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## WELCOME!

You are joining the staff of a hospitality business owned and professionally managed by TPI Hospitality (TPI). In the TPI story that follows you are given the highlights of that beginning as well as the growth plans for the future. As part of your property's team, you will make your property more than just another place for our guests to visit. Your management will assist you in perfecting the many skills that are needed in this profession. Friendliness, knowledge of available services and all the conveniences of a home away from home are just touching on the basics. All your skills give our guests something they can count on, the promise of a satisfying visit, whether they stay for a meal or for several days.

This Associate Handbook will acquaint you with many of the policies concerning your property and certain benefit programs available to you. Specific benefits will be outlined in separate books included with the distribution of this book or at the time you become eligible for such benefits. Please keep this handbook available as a guide during your TPI experience. Contact your immediate Supervisor for any additional information. We hope you are excited about your new role. We are proud to have you as a member of our family. Thanks for joining the TPI team!

If you work at a Margaritaville brand, you will receive supplemental policies related specifically to the Margaritaville brand during the orientation process.

## I AM YOUR GUEST

*I am your guest. Satisfy my wants, add personal attention and a friendly touch and I will become a walking advertisement for your products and services. Ignore my wants, show carelessness, inattention and poor manners, and I will simply cease to exist as far as you are concerned.*

*I am sophisticated. Much more so than I was a few years ago. My needs are more complex. I have grown accustomed to better things. I have money to spend. I am an egotist. I am sensitive. I am proud. My ego needs the nourishment of a friendly, personal greeting from you. It is important to me that you appreciate my business. After all, when I buy your products and services, my money is feeding you.*

*I am a perfectionist. I want the best I can get for the money I spend. When I am dissatisfied, then take heed. The source of my discontent lies in something you or the products you sell have failed to do. Find that source and eliminate it or you will lose my business and that of all my friends as well, for when I criticize your products or services, I will talk to anyone who will listen.*

*I am fickle. Other businesses continually beckon to me with offers of 'more' for my money. To keep my business, you must offer something better than they. I am your guest now, but you must prove to me again and again that I have made a wise choice in selecting you, your products and services above all others.*

## MANAGEMENT PHILOSOPHY

A well-organized and motivated team having accountability built into its system will excel if it has the physical tools to work with and possesses the innate skills necessary to conduct their work.

### Traits Necessary for Success

1. *Organization* - Defined, Focused, Encompassing
2. *Motivation* - Energetic, Positive, Aggressive, Fair Compensation and Treatment
3. *Accountability* - Performance Measurements, Standards Upheld Always
4. *Physical Tools* - Viable Market, Operating Supplies, Facility
5. *Innate Skills* - People Person, Organized, Communication, Vision, Observant/Sensitive, Fair, Skill/Knowledge

A system, which is not “briskly” driving towards successfully incorporating the above traits throughout, can still subsist. However, its performance will assuredly be less than its potential and unacceptable by TPI Hospitality Standards.

### Profitability Progressively Achieved

Results are what count. Not how fast we chase our tails. And, you can't save your way to prosperity. Nor can you spend your way to prosperity.

## OZ PRINCIPLE

While working with the TPI Hospitality team you may periodically hear the phrase ‘above the line’ or ‘below the line’. These phrases are part of TPI’s culture and refer to the “Culture of Accountability” as outlined in the book entitled “The Oz Principle”.

The Oz Principle accountability graphic demonstrates our belief that a thin line separates success from failure, and great companies from ordinary ones. ‘Below the line’ behavior includes excuse making, blaming others, confusion and an attitude of helplessness. ‘Above the line’ behavior includes a sense of ownership, commitment, solutions to problems and determined actions. It is our goal to always remain ‘above the line’ and hold ourselves accountable for creating exceptional results. By taking responsibility you make your team stronger and you create greater opportunities for team and personal success.

## CORE VALUES

TPI Hospitality is committed to a set of core values that guide us in developing our cultural and business strategies. We believe that everything we do should reflect the following core values:

Set the Example for Others to follow

Inure is Reinvented

Accountability First

You Before Me

Service & Guest Satisfaction

Honest and Straightforward

Autonomy is Earned

Respect One Another

Pace Setters Win

It is these core values that are the corner stone of the TPI culture. At some point, you received a card identifying these core values. We provide these cards to better assist you in remembering the core values and allow the core values to guide you in your role at TPI. Remember, practicing these core values allows you and the entire TPI team to “Stay Sharp”.

## HISTORY OF TPI HOSPITALITY

Ray E. Torgerson was the first generation of the Torgerson family entrepreneurs. After years of working in the men's clothing business in Alexandria, MN, Ray moved to Kerkhoven, MN and opened his own clothing store in 1930. A few years later Ray moved the store to the nearby city of Willmar, MN. Ray was a hard working, honest man who prided himself on building relationships and helping people in need. He was a very kind and giving person whose attitude and work ethic passed on to future Torgerson generations. The Great War came and went in the 1940's and the store survived and was successful. Due to illness, Ray turned over management of the store to his son, Tom B. Torgerson, in 1957.

Representing the second generation of Torgersons, Thomas B. Torgerson was literally raised in the store experiencing his father's ways of conducting business. Tom served 8 ½ years as an artillery officer reserve during the Cold War and was a graduate of the University of Minnesota. He was working toward his Masters degree when Ray became ill. At that time Tom moved back to Willmar and, through aggressive expansion, he opened several more stores and added women's retail boutiques. Tom expanded the business beyond retail clothing to include banking in 1964 when he and a group of partners received a national charter to start Citizens State Bank in Willmar. They later purchased the 1<sup>st</sup> State Bank of Lake Lillian. A comment at a bank directors' meeting sparked Tom's interest in the hospitality industry when it was mentioned that Willmar could use a first-rate hotel. Tom shortly thereafter obtained the Holiday Inn franchise for Willmar and opened the hotel in 1972. Tom expanded his interest in hospitality to include several hotels and restaurants throughout the State of Minnesota in the cities of Willmar, Fairmont and Austin. In 1990, Tom and his wife, C. Suzanne Torgerson (Sue), separated and Sue retained the hospitality entities.

In 1991, TPI Hospitality, Inc. (TPI) became a registered entity with the third generation of the Torgerson family. Thomas R. Torgerson and David B. Torgerson purchased three of the hospitality assets (Holiday Inns of Willmar and Austin and Days Inn Willmar) from Sue and formed TPI. Additionally, at this time TPI contracted to manage the remaining hospitality interests that Sue retained.

Tom joined the family business in 1979 while home on holiday break from the University of Minnesota. At that time, his parents called a meeting with him and explained their desire to retire and sell the businesses. Tom responded, though his involvement in the family business to that point had been exclusively with the clothing operation, that he felt he would enjoy the hospitality business over retail or banking. He further stated that he thought he would make a great Innkeeper. The following morning at the age of 21 and fresh out of his senior year of college, Tom was announced as the new General Manager of the Holiday Inn in Fairmont, MN. Having never worked in the hotel and restaurant business previously the next twelve months provided for a steep learning curve in this business. Through hard work and associate support the business grew very profitable and Tom became the Operations President of the family business in 1982.

David B. Torgerson joined the family business in 1984 and moved up through the ranks becoming the General Manager of the Holiday Inn in Willmar and then VP and Director of Sales and Marketing prior to the formation of TPI.

Tom purchased David's interest in TPI in 1998 which was one of several steps moving TPI out of the family business realm. For 27 years, TPI was solely controlled by Tom, who owned 100% of the voting interests and 50% of the ownership interests. Tom's former wife, Tammy Bourgon, owned the other 50% non-voting ownership interest.

In 2015, Tom sold TPI Hospitality to its associates, making it the nation's largest 100% employee-owned hospitality company. In 2020, TPI Hospitality and the entire hospitality industry experienced a devastating

financial impact directly related to the COVID-19 crisis. The incredible financial strain made it impossible for this young, employee-owned company to survive. John Dammermann, one of TPI's joint venture partners, made an unsolicited offer to purchase the company and provide much needed financial stability.

Today, TPI Hospitality continues to operate as a pure hospitality company that develops, owns and operates hotels and restaurants. TPI has a very small pool of individual investors that have repeatedly chosen to expand their investment in TPI assets.

TPI Hospitality continues to expand its portfolio on a relatively constant pace by aligning itself with highly respected franchises in the industry, building a healthy culture and maintaining a strong and effective management team.

Businesses in TPI's portfolio include:

Hilton Brands:

- Hampton Inn Bloomington, MN
- Hampton Inn Eden Prairie, MN
- Hampton Inn Fairmont, MN
- Hampton Inn Maple Grove, MN
- Hampton Inn Minnetonka, MN
- Hampton Inn Roseville, MN
- Hampton Inn Spicer, MN
- Hilton Garden Inn Bloomington, MN
- Hilton Garden Inn Eagan, MN
- Hilton Garden Inn Shoreview, MN
- Home2 Suites Roseville, MN
- Homewood Suites New Brighton, MN
- Homewood Suites Rochester, MN
- Homewood Suites St. Louis Park, MN

Marriott Brands:

- AC St. Louis Park, MN
- Courtyard Maple Grove, MN
- Courtyard Roseville, MN
- Courtyard Rochester, MN
- Residence Inn Maple Grove, MN
- Residence Inn Roseville, MN
- Springhill Suites Maple Grove, MN
- SpringHill Suites Rochester, MN

InterContinental Hotel Brands:

- Holiday Inn Hotel & Suites Maple Grove, MN
- Holiday Inn Express Hotel & Suites Golden Valley, MN
- >>> DELETED HOLIDAY INN EXPRESS ROSEVILLE <<<
- Holiday Inn Express Willmar, MN
- Staybridge Suites Bloomington, MN
- Staybridge Suites Maple Grove, MN
- Staybridge Suites Naples, FL

Best Western Brands:

- Best Western Fairmont, MN
- Best Western Plus Willmar, MN



Margaritaville Brands:

- Margaritaville Resort Fort Myers Beach, MN
- Compass Naples, FL

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Carlson Companies Brands:

- Country Inn & Suites Willmar, MN

Restaurant Brands:

- Green Mill Restaurant & Bar Fairmont, MN
- Green Mill Restaurant & Bar Willmar, MN
- Perkins Restaurant & Bakery Austin, MN
- Perkins Restaurant & Bakery Fairmont, MN
- Perkins Restaurant & Bakery Red Wing, MN
- Ruff's Grill & Wings Willmar, MN

## ORGANIZATIONAL CHARTS

- TP Corporate
- Limited-Service Hotel Prototype
- Restaurant Prototype
- Full-Service Hotel Prototype

## **Introduction**

Each associate will receive and review a TPI Hospitality Associate Handbook each year. Each associate will be required to sign a form when a new version is issued each year. This handbook provides general information about workplace practices, as well as the benefits programs, services and opportunities available to you. Please read it carefully and keep it in a convenient place for future reference. Every October Senior Management reviews our policies, procedures and benefits. Prior to that time, you should share your ideas and decisions will be made in regards to changes.

## **Employment at Will**

TPI Hospitality is an At Will employer. Neither this handbook or any TPI Hospitality procedures and communications are intended to be interpreted as a promise or guarantee of future or continued employment or as stating provisions and terms of employment. TPI Hospitality and its associates recognize their mutual right to end their employment relationship at any time, for any non-discriminatory reason, and acknowledge that such relationship is one of employment At Will. Except with respect to employment At Will, TPI Hospitality reserves the right to change or make exceptions to its human resources policies, procedures and benefits, including those for retirees, at any time without notice.

## **Equal Opportunity Employer**

The TPI Hospitality commitment to equal employment opportunities and the value of diversity is an essential part of its business practices and principles. Our compensation and benefits programs, as well as our hiring, training, promotion and transfer policies, reflect our dedication to equal employment opportunities. TPI Hospitality supports the employment of minorities, women, veterans and persons with disabilities.

Individuals with disabilities have opportunities to identify reasonable accommodations that may assist them in successfully and safely performing their jobs. Associates also have the opportunity to identify their veteran status.

TPI Hospitality will not tolerate any form of discrimination or harassment based on race, color, religion, age, national origin, disability, gender, gender identification, sexual orientation, or marital status. In addition, TPI Hospitality will not tolerate sexual harassment, including unwelcome sexual advances, requests for sexual favors or other verbal or physical conduct of a sexual nature in the workplace. Refer to the Harassment, Offensive Behavior and Non-Discrimination Policy section of this handbook for our guidelines on harassment.

## **Associate Handbook Amendment Policy**

TPI Hospitality continues to recognize the needs of our associates and has improved our benefit program many times in the past and will continue to do so in the future. Each year we survey benefits provided by other food and lodging companies. We research these benefits and analyze our benefit program. We wish to remain competitive and when business and economic conditions dictate, we will amend the benefits we provide for our associates. The information set out in this handbook is as complete as we can reasonably make it. However, it is not necessarily all-inclusive because circumstances that we have not anticipated may arise. Some currently unanticipated circumstances may warrant the application of discipline, including discharge. Management reserves the right to make any changes at any time by adding, deleting, or changing any existing policy. Management may vary from the listed policies if, in its opinion, the circumstances require.

## **Human Resources Policy**

Because we have and will continue to recognize our associates as our greatest assets, it is the policy of TPI Hospitality:

1. To create and foster a climate in which associates are given a challenge and are assured of an opportunity to realize their full potential and the satisfactions that accompany achievement.
2. To staff each position at the Property with the most capable individual available, utilizing the services of each associate in a position that offers the maximum opportunity for usefulness and growth.
3. To fill openings through promotions from within the organization whenever practical and to promote on the basis of ability and performance.
4. To select associates according to their individual qualifications without regard to race, color, non-disqualifying handicap, religion, creed, national origin, age, status with regard to public assistance, gender, gender identification, marital status, sexual orientation, genetics, or any other characteristics protected by law.
5. To develop through selection and training, intelligent, ethical, effective, and dynamic managers who will contribute to the Property's continued growth and success and who will inspire and motivate their subordinates in the accomplishments of Property objectives.
6. To compensate each associate equitably and consistently, based on duties and responsibilities assigned, individual merit and prevailing community and industry standards.
7. To deal with each associate as a respected individual who is to be treated with courtesy, dignity, and consideration, to be encouraged and assisted in progress and to be informed regarding Property policies, objectives, and achievements.

If an associate has any questions concerning the intent or application of this policy, please contact:

Pete Bromelkamp, Chief Human Resources Officer  
TPI Hospitality Corporate Administrative Office  
Water's Edge Professional Building  
103 15<sup>th</sup> Avenue NW, Suite 200  
Willmar, MN 56201  
Cell: 612.240.7282  
E-mail: [pete@tpihospitality.com](mailto:pete@tpihospitality.com)

## Associate Relations

TPI Hospitality and your Management team are committed to open communication with its associates. To support this commitment the Company has adopted the following policy: TPI Hospitality and your Management team are pledged to maintain high standards of individual treatment and personal respect for each of our associates. We have accepted our responsibility to provide associates with excellent working conditions, competitive pay, and benefits and to administer company policies in an equitable manner. The Open Door Policy is a strong statement of the associate relations program. We will attempt to reinforce its value and help suggest ways in which to administer it to its fullest. It is, therefore, our belief that with all of us working together as a team, as "Partners in Success" we can accomplish our goals.

## Open Door Policy

We believe it is extremely important that all associates be able to give their suggestions, make comments or get an answer to a problem. You are important to our success! TPI Hospitality is interested in you, and we wish to explain the Open Door Policy. We know in your daily routine you encounter *problems* that need answers, have *ideas* about better ways to accomplish your goals and *thoughts* about how all this works together to give service to our guests. The method to communicate these concerns is through the "Open Door Policy".

First, discuss the *problem*, *idea* or *thought* with your immediate Supervisor to see if a satisfactory

conclusion can be reached. If you feel you cannot discuss this with your immediate Supervisor or after talking with him/her you are still not satisfied, ask to speak with your General Manager; then your Operations Senior Vice President; then the Chief Human Resources Officer of TPI Hospitality. A copy of this Open Door Policy has been posted on your property. Your General Manager's, Operations Senior Vice President's and TPI Hospitality Corporate telephone numbers and address are also posted. You will be asked to sign a copy of this policy.

ADMINISTRATIONS:

<u>Cell</u>	<u>Email</u>	<u>Office</u>
Chris Flagg	chris@tpihospitality.com	
Gene Lubbers	gene@tpihospitality.com	320.235.7207 ext. 101
Kathy Aamot	kathy@tpihospitality.com	320.235.7207 ext. 190
Nick LaPatka	nick@tpihospitality.com	320.235.7207 ext. 103
Sheryl Walton	sheryl@tpihospitality.com	320.235.7207 ext. 120

OPERATIONS:

<u>Cell</u>	<u>Email</u>
Robert Kisabeth	robert@tpihospitality.com
Ben Coady	ben.coady@tpihospitality.com
Chris Poletes	chris.poletes@tpihospitality.com
Dar Johnston	dar.johnston@tpihospitality.com
Dee Anne Osborne	deeanne@tpihospitality.com
Dennis Wallenta	dennis@tpihospitality.com
Jason Hall	jason.hall@tpihospitality.com
Jennifer Koll	jennifer.koll@tpihospitality.com
Joel Danko	joel.danko@tpihospitality.com
Joel Finley	joel.finley@tpihospitality.com
Joel Vogler	joel@tpihospitality.com
David Cesario	david.cesario@tpihospitality.com
Katie Kampe	katelyn.larson@tpihospitality.com
Larry Eisenberg	larry@tpihospitality.com
Matt Weimer	matt@tpihospitality.com
Pete Bromelkamp	pete@tpihospitality.com
Toni Stanton	toni.stanton@tpihospitality.com

LOCATIONS:

<u>Telephone</u>	<u>Email</u>
Perkins Austin	pa.gm@tpihospitality.com
Hampton Inn Bloomington	hb.gm@tpihospitality.com
Hilton Garden Inn Bloomington	hgib.gm@tpihospitality.com
Staybridge Suites Bloomington	ssb.gm@tpihospitality.com
Hilton Garden Inn Eagan	hgie.gm@tpihospitality.com
Hampton Inn Eden Prairie	hep.gm@tpihospitality.com
Best Western Fairmont	bwf.gm@tpihospitality.com
Green Mill Fairmont	gmf.gm@tpihospitality.com
Hampton Inn Fairmont	hif.gm@tpihospitality.com
Perkins Fairmont	pf.gm@tpihospitality.com

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Holiday Inn Express Golden Valley	763.545.8300	hixgv.gm@tpihospitality.com
Courtyard Arbor Lakes	763.425.5355	cyal.gm@tpihospitality.com
Hampton Inn Arbor Lakes	763.494.4498	hal.gm@tpihospitality.com
Holiday Inn Arbor Lakes	763.425.3800	hial.gm@tpihospitality.com
Residence Inn Arbor Lakes	763.275.9630	rial.gm@tpihospitality.com

SpringHill Suites Arbor Lakes	763.275.9631	shsal.gm@tpihospitality.com
Margaritaville Fort Myers Beach		mvfmb.gm@tpihospitality.com
Staybridge Suites Arbor Lakes	763.494.8856	ssal.gm@tpihospitality.com
Hampton Inn Minnetonka	952.955.8855	hm.gm@tpihospitality.com
Compass Naples	239.643.8002	csn.gm@tpihospitality.com
Homewood Suites New Brighton	651.631.8002	hsnb.gm@tpihospitality.com
Perkins Red Wing	651.385.0783	prw.gm@tpihospitality.com
Courtyard by Marriott Rochester	507.536.0040	cyr.gm@tpihospitality.com
Homewood Suites Rochester	507.218.3320	hsr.gm@tpihospitality.com
Springhill Suites Rochester	507.281.5455	shsr.gm@tpihospitality.com
Courtyard Roseville	651.746.8000	cyrv.gm@tpihospitality.com
Hampton Inn Roseville	651.209.3000	hr.gm@tpihospitality.com
>>> DELETED HIXR <<<		
Home2 Suites Roseville	651.925.8600	h2r.gm@tpihospitality.com
Residence Inn Roseville	651.636.0680	rivr.gm@tpihospitality.com
Hilton Garden Inn Shoreview	651.415.1956	hgis.gm@tpihospitality.com
Hampton Inn Spicer	320-796-3000	hs.gm@tpihospitality.com
AC St. Louis Park	763-545-0000	acslp.gm@tpihospitality.com
Homewood Suites St. Louis Park	952.544.0495	hsslp.gm@tpihospitality.com
Best Western Plus Willmar	320.235.6060	bww.gm@tpihospitality.com
Country Inn & Suites Willmar	320.214.0300	cisw.gm@tpihospitality.com
Green Mill Willmar	320.231.2301	gmw.gm@tpihospitality.com
Holiday Inn Express Willmar	320.231.2601	bww.gm@tpihospitality.com
Ruff's Grill & Wings Willmar	320.214.7833	rww.gm@tpihospitality.com

## TPITALK – Your Opinion Matters!

TPI Hospitality values your feedback and has provided multiple avenues of communication allowing you to share your concerns, ideas, and suggestions. These tools will help us better understand what is on your mind and assist us in making TPI Hospitality a rewarding work experience. Your comments can remain anonymous. Contact us online at <https://www.tpihospitality.com/tpi-talk/> or by telephone at 833-TPITALK (833-874-8255) or email to [tpitalk@tpihospitality.com](mailto:tpitalk@tpihospitality.com).

## Orientation

Your TPI orientation experience will include:

- **Day 1:** 1-2 hours of personal interaction with your General Manager (or Department Head at Margaritaville Fort Myers Beach)
- **Within 10 days:** Foundation Training - important information concerning your TPI experience
- **Within 30 days:** Cultural Orientation - important cultural aspects of your TPI experience
- **Within 90 days:** Additional State and TPI-mandated training

## Immigration and Employment Eligibility

The Immigration Reform and Control Act of 1986 requires employers to review and retain certain documents verifying that associates are authorized to work in the United States. All applicants for employment are notified that the company hires only individuals who are United States citizens and/or aliens with authorization to work in the United States.

On or before your first day of employment, you will do the following:

- Present documents establishing your identity and authorization to work in the United States.
- Complete and sign an Employment Eligibility Verification Form (I-9) attesting to the authenticity of the documents presented.

## Social Security Number Verification

In an effort to achieve conformity with the Social Security Administration/Department of Homeland Security, TPI Hospitality has chosen to verify all social security numbers as a condition of employment. Upon hire, your social security number will be verified before your first scheduled shift. Any social security number that is invalid will prohibit employment until a valid number is verified.

## Introductory Period

Your first 90 days of employment with us are considered an orientation period. This is the time when each new associate's performance is reviewed to assure suitability for the position for which the associate was hired. This is a period of time that allows you to decide if you enjoy your job as well as the hospitality industry. You should not hesitate to talk to your Supervisor about any aspect of the job that you do not understand or that may be causing you a problem. During this period, your Supervisor will also speak with you about your progress and will tell you about Property policies and practices. Successful completion of the orientation period does not guarantee continued employment.

## Associate Classifications

TPI Hospitality maintains employment classifications to determine your employment status and eligibility for benefits. Employment classifications are defined as follows:

- Full-time associate — an associate who averages 30 or more hours worked each week. Salaried Managers are classified as regular full-time associates. A regular full-time associate will be eligible for benefits as outlined in this handbook.
- Part-time associate— an associate who is employed on a permanent basis and averages less than 30 hours worked each week. Regular part-time associates are eligible for the benefits as outlined in the handbook specifically pertaining to regular part-time associates.
- Regular associate – an associate who has been hired for an indefinite period of time. Regular does not provide any express or implied guarantees of employment.
- Temporary associate – an associate who has been hired to be employed for less than one year. This person is often employed on a call-in basis. A temporary associate is not eligible to participate in the benefits as outlined in this handbook.
- Seasonal associate – an associate who has been hired to be employed for more than one year. This person's hours will be during special occasions, holidays and school breaks. A seasonal associate is not eligible to participate in the benefits as outlined in this handbook.

When associates are hired, they shall be assigned a status. That status shall remain the same until the Supervisor alters it. Incidental changes in scheduling, etc. are not justification for change in an associate's status. However, as a general rule, changes affecting status which are contemplated for a six-month period or more justify a change in status. The responsibility for proper status assignments is that of the Supervisor. It should be understood that the associate status governs wages, benefits and other terms and conditions of employment. IT IS IMPERATIVE THAT THE ASSOCIATE BE ASSIGNED THE PROPER STATUS.

In addition, all associates are defined as either exempt (salaried) or non-exempt (hourly):

- Exempt — Exempt associates work in executive, administrative, professional or sales positions that are defined as exempt from the minimum wage +overtime requirements of the Fair Labor Standards Act.
- Non-exempt — Non-exempt associates are covered by the minimum wage and overtime requirements of the Fair Labor Standards Act.

## Child Labor Requirements

Minors under age 16 may not be employed before 7:00 a.m. and after 7:00 p.m. during school weeks or 9:00 p.m. from June 1 to Labor Day. They may not be employed for more than 3 hours on a school day or 18 hours in a school week. Also, they may not be employed for more than 8 hours on a non-school day or 40 hours in a non-school week. 16 and 17-year-old minors may not be employed past 11:00 p.m. or before 5:00 a.m. on the evening or morning before a school day. However, with written permission from an associate's parent or guardian, they may work until 11:30 p.m. or start at 4:30 a.m. This law does not apply when school is not in session or on Friday or Saturday nights, or to 16- and 17-year-olds who have dropped out of school. There are also limitations on the types of jobs performed by a minor.

## **Advancement and Promotion**

The longer you work at your property the more skilled you become at creating win-win outcomes. Your property wants to keep associates with ability and loyalty, and you may expect to be rewarded for long and faithful service. Those who work hard and improve their skills may receive promotions and salary increases. There is no secret to promotion. It is based on job knowledge and job performance. It is entirely up to you. Others may like their original job and choose to stay with it. In this case, associates with long, proven performance and service will continue to be one of the key members of the TPI team.

## **Transfers**

A regular full-time associate with 6 months service may ask for a transfer from one TPI Hospitality property to another. You will be granted a transfer if a job is available, and you are qualified for the position without loss of any seniority benefits or insurance coverage. Your General Manager, Operations Senior Vice President, and the Chief Operations Officer of TPI Hospitality must approve transfers.

Letters of recommendation and verbal recommendations must be done in strict compliance of guidelines stated in this handbook under "Future Job References".

## **Personnel Record**

Inform your direct supervisor of any change in address, telephone number, marital status, tax exemption status or the name and number of emergency contact persons. We want you to enjoy every opportunity possible, so tell us when you have completed educational courses or gained new skills that could advance your hospitality industry career.

All associate records are stored electronically. Upon written request you may receive a copy of your personnel file. You have the right to review your file once every six months and at least once per year following termination of employment. If an associate disputes specific information contained in their personnel file, the Supervisor and associate may agree to remove or revise the disputed information. If an agreement is not reached, the associate may submit a written statement not to exceed five pages to be maintained with the disputed information in their personnel file. In accordance with Minnesota statutes, section 181.960, subd. 4(9), some information may be withheld as it would disclose the identity of a co-worker(s).

## **Confidentiality Agreement**

In connection with your employment with TPI Hospitality, TPI may furnish you with certain confidential and proprietary information concerning the business and properties of TPI. This information (and any information obtained by meeting with TPI, or any of its affiliates, or its associates, advisors, agents or representatives) furnished or made available to you in the course of your employment from any of the foregoing includes but is not limited to TPI Operations Manual, TPI Performance and Compensation Manual, TPI Associate Handbook, Franchise Standard Manuals, Recipes, Trade Secrets, Financial Statements, Rates, Budgets, Pricing, Occupancies, Terminations and Hirings, Company Organization, Guest Service Scores, Customer Profiles, Business Methods, Marketing Techniques, Software, Hardware,



Marketing Plans, Insurance Information, Employment and Employment Application Information, Paper or Electronic files or other pertinent Company or Brand Specific information which relates to the services or to any business of TPI. You acknowledge and agree that it is imperative that the Evaluation Material remains confidential.

To maintain the confidentiality of the Evaluation Material, you agree:

- a. Not to use or allow the use for any purpose of any portion of the Evaluation Material or notes, summaries or other material derived from your inspection or evaluation of the Evaluation Material except in the ordinary course of performing your duties on behalf of the Company.
- b. Not to disclose or allow disclosure to third parties and/or our competitors of any portion of the Evaluation Material except for the sole purpose described in the first paragraph.
- c. Not to duplicate, copy, redistribute, disclose to third parties and/or our competitors or utilize the Evaluation Material except as may specifically be authorized.

This agreement shall be inoperative as to particular portions of the Evaluation Material if such information was already known by you at the time of the disclosure by the Company or becomes generally available to the public other than as a result of a disclosure by you.

General Managers and Department Managers will be required to sign a Confidentiality Agreement that will be kept in their personnel file.

## **Reduction in Work Force**

Should a reduction in the work force ever be necessary, Management will consider the skills, ability and qualification of individuals. Where skill and ability are relatively equal, seniority will be considered the determining factor.

## **Future Job References**

TPI Hospitality Management and Supervisors will not provide personalized references, written or verbal, without prior approval from the Chief Operations Officer of TPI Hospitality. When references are requested from the Corporate Administrative Office only the following information will be provided: (1) Employment Verification including verification of social security number, (2) Previous Job Responsibilities and (3) Dates of Employment.

## **Wage Sharing**

Under the Minnesota Wage Disclosure Protection law, you have the right to tell any person the amount of your own wages. Your employer cannot retaliate against you for disclosing your own wages. Your remedies under the wage disclosure protection law are to bring a civil action against your employer and/or file a complaint with the Minnesota Department of Labor and Industry at 651-284-5070 or 800-342-5354.

Florida does not have specific wage disclosure protection. If necessary, we expect all associates to discuss wages in an honest, respectful manner.

## **Benefits Outline**

Do not make any assumptions as to if / how these benefits apply to you without referring to the specific detailed explanations of each.

Dental Insurance:	Available with or without health insurance. Premiums 100% paid by associate on a pre-tax basis.
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Direct Deposit + Email:	Automatically deposit paycheck into your bank account(s). You have
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the option to receive your Direct Deposit Statement via email.

Funeral Pay:	2 days per funeral of immediate family members.
Holiday Pay:	Paid time and one-half on 6 holidays for hours worked by hourly, non-tipped associates.
Jury Duty:	Wage difference continuance while serving up to one month.
Life Insurance:	Included in group medical insurance cost; \$20,000 coverage for associate only, \$40,000 if accidental death.
Lodging:	Minnesota: \$39 rates at TPI Hospitality hotels when Associate Rate is available. \$79 rates for Park-N-Fly when Associate Rate is available. \$79 weekend rates at Holiday Inn Arbor Lakes Waterpark Hotel when Associate Rate is available. Florida: 40% discount when reserved through the Margaritaville associate reservation website. Hotel franchises may also have discounts available.
Meals:	Minnesota: 50% discount on and off duty for an associate-only meal, up to a \$10 maximum discount. This excludes all delivery items and alcoholic beverages. Florida: 50% discount while on duty for an associate-only meal. 25% discount while off duty available to the associate and one guest.
Medical Insurance:	Choice or Standard or High Deductible Health Plan Option. TPI/Associate Premiums: TPI pays a portion of all premiums Pre-tax deductible status for portion of premium paid by associate.
Pay Card:	Automatically deposit funds to a Visa card each payday.
PTO (Personal Time Off) Pay:	Zero to 184 hours (up to 23 days for salaried associates) paid per year based on anniversary date.
Retirement Savings Plan (401k):	Company matches 50 cents of every \$1.00 up to 6% of payroll.
Supplemental Insurance:	Premiums paid 100% by associate. Coverages offered through AFLAC. Short Term Disability, Accident, Sickness, Hospital, Specified Event, Life Insurance, Juvenile Insurance, Dental, Vision, Intensive Care, Cancer
Tuition Discount:	Available with Rasmussen College.
VTO (Volunteer Time Off) Pay:	One day of pay annually to provide volunteer work for the organization of your choice.

## Benefits Summary

**Health/Major Medical Group Insurance** - Associates who are 18 years of age and who average 30 hours

worked per week are eligible for hospital, surgical and major medical group insurance coverage on the 1<sup>st</sup> of the month after 30 days of employment. You can choose between Choice, Standard or High Deductible Health Plan Options. If you elect not to participate at the time of your eligibility, you will be required to sign a waiver. If you do not apply for coverage when you are first eligible you will not be able to join our group insurance coverage until the following open enrollment date (January 1<sup>st</sup>). Applications are processed the 15<sup>th</sup> and 30<sup>th</sup> of each month and take approximately 7 to 10 days from submission to be approved. To enroll in the group health insurance plan, contact your supervisor to complete an application. Your supervisor will be happy to answer any questions also. For more detailed information please check our group insurance documents on We Are A Team website.

Upon receiving acceptance from the Insurance Company your insurance will go into effect and you will receive an insurance identification card directly from the Insurance Company. Depending on your coverage, your property will pay part of the premium cost on group health/major medical insurance coverage for single or dependent coverage. Your portion of the premium is payroll deducted on a pre-tax basis.

We participate in the network plan with our insurance company. To see specific information concerning out-of-pocket expenses and deductibles, click on the Benefits link under the Associate tab on the We Are A Team intranet website. You have the right to continue your group coverage in accordance with the provisions of COBRA.

**Dental Insurance** - Regular full-time associates who are 18 years of age are eligible to participate in the dental insurance benefit on the first of the month after 30 days of employment with TPI. Dental insurance is available with or without health insurance. Contact your supervisor for details or refer to our group insurance handbook. Dental coverage premiums are 100% paid via payroll deduction by the associate on a pre-tax basis.

**Disability Insurance** - Disability Insurance is provided for General Managers and Senior / Operations Vice Presidents only.

**Life Insurance** - TPI Hospitality group health/major medical insurance plan includes life insurance of \$20,000; \$40,000 if accidental death. Contact your supervisor for details or refer to our group insurance handbook.

**Supplemental Insurance with AFLAC** – Regular full-time associates who are 18 years of age are eligible to participate in supplemental Insurance with AFLAC on the first of the month after 30 days of employment with TPI. These premiums are 100% paid by the associate through payroll deduction. TPI Hospitality does not pay any part of these costs. The following coverages are available and administered through AFLAC:  
Accident Expense Plan: Helps offset the expenses associated with an accidental injury on + off the job.  
Cancer Protection Plan: Helps offset the medical expenses related to cancer treatment.  
Critical Illness: Helps with the cost of treating covered critical illnesses.  
Dental: Dental coverage with no networks or deductibles. Orthodontic rider available.  
Short Term Disability: Helps offset the loss of pay resulting from a sickness or off-the-job injury.  
Hospital Confinement: Helps offset the non-covered expenses of a hospital stay.  
Life Insurance: Both term and whole options available as well as family coverage. Includes Juvenile Life.  
Vision: Helps offset the expenses of eye exams, vision corrections, eye surgery, eye diseases.

**401 (k) Retirement Savings Plan** - TPI Hospitality has developed a 401(k) plan for its associates to assist you in achieving financial security for your retirement years. Associates who are 21 years of age and average 1,000 hours worked per year and have completed one year of employment are qualified to participate in this plan. At your request, TPI Hospitality will automatically deduct an amount you choose from your paycheck and forward it to Alerus. From that point on you manage your funds directly with Alerus. Alerus

offers a wide variety of ways for you to invest your funds with ease along with quarterly reporting on your fund's performance. Contributions to your traditional 401(k) earnings are tax-exempt until you elect to make withdrawals. Contributions to your Roth 401(k) funds are after paying tax and the distributions at retirement will be tax free.

You may contribute any percent [%] of your wages. Additionally, TPI Hospitality will contribute on your behalf an additional fifty cents for each dollar you contribute, up to a maximum of 6% of payroll. TPI Hospitality' contribution is subject to the following vesting requirements:

<u>Qualified Employment Term</u>	<u>Percentage Vested</u>
1 year	20%
2 years	40%
3 years	60%
4 years	80%
5 years	100%

Twice each year is the time that you can initially become involved in the plan. This application process will be in the months of February and August. Official sign-up dates are March 1 and September 1 of each year. Positions in job code 5 (typically supervisory positions) or above are eligible to apply at date of hire. Alerus is also available at any time to personally assist you one-on-one in your financial planning. To participate contact your supervisor to complete an Application and Beneficiary Form.

NOTICE: The above information on TPI Hospitality Pension/Retirement Savings Plan is an overview only. The specifics of the plan will be made available upon request and at any seminars. You may also call Sweet Financial (800-658-2507) with any financial planning questions free of charge.

**Tax Advantage Benefits** - TPI Hospitality will make available to you the option to *Save Income Taxes and Increase Your Take-Home Pay* through our Group Health and AFLAC administered accounts. TPI Hospitality makes this opportunity available to you at absolutely no cost. Typically, when you pay your Medical Insurance Premiums and/or some of your AFLAC premiums you are doing so with After-Tax dollars. By participating in TPI Hospitality Tax Advantage Benefit you can pay for these costs with Pre-Tax dollars. Doing that means you do not pay Federal income taxes, State income taxes or social security (FICA) taxes on the dollars you spend. So, in effect, you put dollars that used to go for taxes to work for you and increase your purchasing power.

**Tuition Discount** – This program allows all associates and immediate family members to receive a 15% tuition discount at Rasmussen College. Text DEGREE10 to 99000 or visit <http://rasmussen.co/ar> and click "Request Info" to complete your request.

**Funeral Pay** – Funeral Pay is available to regular full-time associates following one full calendar quarter of employment. If it is necessary for you to be absent from scheduled work to attend a funeral due to a death in your immediate family, you are eligible for up to two scheduled days off with pay. To request Funeral Pay, complete the TPI Hospitality Payroll Form and have it properly authorized. Your immediate family is defined as a Spouse, Children, Parents, Siblings, Legal Guardian, Grandparents, Parents-in-law, and Siblings-in-law.

**Personal Time Off (PTO) Pay** – The TPI Hospitality Personal Time off associate benefit has been designed to allow TPI associates to manage their paid days off based on their life circumstances. The PTO benefit provides time off for associates for any reason including time off in cases of their own illness or injury as well as an illness or injury to the associate's child (minor or adult), spouse, sibling, parent, parent-in-law, grandchild (including biological, adopted, foster or step-grandchild), grandparent or step-parent. In addition, an associate may use PTO for 'safety leave' which is leave to provide or receive assistance in cases of sexual assault, domestic abuse or stalking. PTO Pay increases with the length of your service.

Paid PTO hours are based on your anniversary date. All associates who average 25 hours worked per week in each of your prior years are eligible for PTO Pay as follows:

<b>Year of Anniversary</b>	<b>Hourly Associates</b>	<b>Salaried Associates</b>
on your 6-month anniversary	0 to 40 hours	5 days
on your 1 <sup>st</sup> year anniversary	0 to 80 hours	10 days
on your 2 <sup>nd</sup> year anniversary	0 to 96 hours	12 days
on your 3 <sup>rd</sup> year anniversary	0 to 104 hours	13 days
on your 4 <sup>th</sup> year anniversary	0 to 112 hours	14 days
on your 5 <sup>th</sup> year anniversary	0 to 120 hours	15 days
on your 6 <sup>th</sup> year anniversary	0 to 128 hours	16 days
on your 7 <sup>th</sup> year anniversary	0 to 136 hours	17 days
on your 8 <sup>th</sup> year anniversary	0 to 144 hours	18 days
on your 9 <sup>th</sup> year anniversary	0 to 152 hours	19 days
on your 10 <sup>th</sup> year anniversary	0 to 160 hours	20 days
on your 15 <sup>th</sup> year anniversary	0 to 168 hours	21 days
on your 20 <sup>th</sup> year anniversary	0 to 176 hours	22 days
on your 25 <sup>th</sup> year anniversary and thereafter	0 to 184 hours	23 days

HOURLY ASSOCIATES and NON-EXEMPT HOURLY MANAGERS have the choice of working and being compensated for their hours worked + PTO Pay or taking time off and only being paid for their PTO Pay. Salaried managers must take time off to be paid PTO per the above schedule. PTO pay is computed using associate's length of service factor x actual regular hours worked during their preceding year. Overtime hours and tips are excluded when computing PTO pay. PTO Pay is paid at your regular hourly wage. PTO hours available will be listed on your biweekly paycheck.

All new hourly associates who average 25 hours worked per week or more over their first six months of employment are eligible for up to 40 PTO hours (up to 45 PTO hours for salaried associates), based on the average weekly hours over the first six months, available on their six-month anniversary. Any hours received on their six-month anniversary must be taken prior to their one-year anniversary. As a condition of hire, associates hired in pay classes 6 and 7, which are typically department head positions, are immediately eligible for 45 hours of PTO; thereafter they are subject to the above schedule. As a condition of hire General Managers and Operations Senior Vice Presidents are eligible for 90 hours of PTO in their 1<sup>st</sup> and 2<sup>nd</sup> year; thereafter they are subject to the above schedule. PTO Pay is paid at your regular salaried wage. PTO hours available will be listed on your biweekly paycheck. After your first year of service, should you leave plus give and work two (2) week notice, upon request, you will be paid for any annual PTO time earned as listed on your paycheck but not taken. This request must be within 30 days of your last day worked. You will be paid this on the next scheduled pay date only for any PTO hours earned, not any accrued PTO hours. If you leave without giving two (2) week's notice you will forfeit any PTO pay.

In cases of conflict in scheduling vacation dates and because your Property's Management may experience 'peak' seasonal business, your Supervisor reserves the right to approve vacation dates. To request PTO Pay, please complete the TPI Hospitality Payroll Form and have it properly authorized. A minimum of 4 hours per day can be requested. PTO time cannot be carried over from one anniversary year to another.

Associates in pay classes 8 and 9 (Directors and General Managers) are eligible for 4 weeks of PTO beginning on Day 1, and associates in pay class 7 (Department Heads) are eligible for 3 weeks of PTO beginning on Day 1. PTO for all other pay classes is based on the schedule above.

**Volunteer Time Off (VTO) Pay** – Every TPI associate who is eligible for PTO will also receive one day of paid VTO (Volunteer Time Off) annually to provide volunteer work for the organization of their choice. This VTO cannot be cashed out and must be used to receive pay. To request VTO Pay please complete the TPI Hospitality Payroll Form and have it properly authorized.

**Holiday Pay** – Because your Property never closes, you may be asked to work on the following holidays. In this case, hourly non-tipped associates will receive compensation for the HOURS WORKED on the holiday at a rate of 1 ½ times your regular pay. This excludes salary compensated management.

Holiday pay is only paid if you actually work on one of these holidays:

- New Year's Eve/Day (3pm Eve to 11pm Day)
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day
- Christmas Eve/Day (3pm Eve to 11pm Day)

**Jury Duty** - TPI Hospitality recognizes your service on a jury as one of your civic duties. If you are a regular full-time associate, have been employed for at least one full calendar quarter and you are absent from your scheduled work shift because of Jury Duty, your Property will pay you the difference between what the court pays and your regular wage, excluding tips and overtime pay up to a maximum of one month.

**Voting** - We encourage you to vote. In the unlikely event your work schedule does not allow time for you to vote during the extended hours the polls are open, you will be given a reasonable period of time off from work to vote. Please remember to advise your Supervisor the day before the election, so that arrangements can be made to properly cover your job duties.

## Payroll Procedures

Your biweekly pay period ends on Saturday (or Sunday for Restaurants) and you will receive your funds the following Friday after 2:00 CST. TPI offers two options for biweekly pay. You can choose to be paid via direct deposit or via a VISA pay card. The pay card works similar to a credit card, allowing you to spend your funds wherever a credit card is accepted or to get cash at many ATMs. There is no credit balance on the pay card, only funds deposited by TPI are able to be spent.

When you provide an e-mail address, you will receive your check stub via e-mail as soon as it's available - usually before Friday. If you contact the TPI Administrative Office, you can have your paycheck directly deposited into multiple banks accounts. Your funds are in the bank even when you're out of town, sick, it's a holiday or you can't get to the bank. No more lost checks.

The TPI Administrative Office will issue paychecks for new associates once all completed paperwork is received.

Any wrong rates, missing or incorrect hours on your check will be corrected on the next check. Lost paychecks will be replaced at a cost of a minimum of \$25 per occurrence.

You will be required to punch in and out using a thumb scan of your fingerprint if you work at a hotel. You will enter your code if you work at a restaurant.

Overtime pay for all non-exempt associates is at the rate of one-and-one-half times your regular rate for all hours worked in excess of 40 hours per work week. On occasion, you may be asked to work at another department other than your regularly assigned location. In those instances, you will be paid overtime rate for all hours in excess of 40 hours per work week.

**Bonuses:** Bonuses earned by any associate will be paid on the next payroll after it was earned (first month following date of hire or transfer/promotion) and approved. Bonuses will not be prorated. You must be employed to receive any monthly, quarterly, or annual bonus. Associates on any kind of Leave of Absence are not eligible to receive bonuses. In extenuating circumstances where market conditions or new property opening create significant variance in revenue and house profit, discretionary bonus money may be made available based on factors such as expense control, quality assurance scores, training and development of personnel and other factors to be determined at the sole discretion of TPI Hospitality Management. Conversely, in situations whereby a bonus has been earned based on the plan criteria, a participant may still be disqualified from receiving part or all of such bonus payment at the discretion of TPI Hospitality Management. Examples of this occurrence include but are not limited to overall substandard work performance of the associate (i.e., if your most recent Performance Appraisal is less than 83), failure to follow Company policy and procedures, exposing the Company to legal liability, inappropriate behavior, withholding information and inadequate follow-through on critical incidents. Any bonus eligible associate that is placed on an action plan will forfeit all bonus eligibility until they have satisfied the objectives of their plan. TPI Hospitality reserves the right to cancel, change, modify or interpret any and all provisions of the bonus plan at any time without notice. Participation in or eligibility for this bonus plan does not create any entitlement to employment or continued employment and does not alter the At Will status of associates. This bonus plan will be governed and construed in accordance with the laws of the States of Minnesota and Florida.

The Federal Government requires your property to deduct for Federal, State income taxes and Social Security / Medicare taxes. Your property contributes an equal amount of Social Security taxes to your account with the Government.

Government regulations also require us to ask those associates who are subject to receive tips to report ALL tips received and to complete a tip report each pay period so that we may help them meet their tax contribution through payroll deductions.

Your paycheck stub will show the exact amount of money earned and the deductions that you have authorized. Any reported tips are not reflected on your year-to-date totals on your check stub but are included on your annual W-2. Please check your payroll check regularly to verify that all the information on the stub is accurate.

## **Garnishments and Court Orders**

The indebtedness of an associate and the actions of creditors are confidential matters that are primarily the concern of the associate and not of TPI Hospitality. However, wage garnishments and court orders for deductions create a legal obligation and potential liability. To comply with the federal and state statutes regarding wage garnishments, court orders, or any other wage deduction claim submitted by a federal, state or municipal taxing authority, TPI Hospitality is required to deduct amounts from your paycheck appropriate to each state's statutes and regulations.

## **Work Schedules**

Your work schedule will be furnished to you by your Supervisor with as much advance notice as possible so that you can plan personal activities. Because your Property likely operates 24 hours a day, 7 days a week and 365 days a year, your work hours may change from time to time to fit business needs. Getting to work on time is part of your job. You are expected to arrive at work shortly before your scheduled shift. Once you are prepared to immediately begin work (but not more than five minutes before your scheduled shift), punch in and report immediately to your Supervisor.

YOU are responsible for your work schedule. Therefore, presence at work each scheduled day is very

important to the successful operation of your Property. If, for reason beyond your control, you cannot come to work as scheduled, you must immediately notify your Supervisor or the Manager on Duty. Leaving a message or telling another associate is not acceptable. It is also unacceptable to text your Supervisor to cancel or change your shift. This ADVANCE notice should be given as soon as the EMERGENCY arises. Your property may have additional expectations concerning work schedules which you are required to adhere to. Please note that every time you are absent from your job an additional burden is placed on your co-workers and Supervisors. Your Property usually enjoys good business and generally its full staff is needed. However, there may be occasions during an 'off season' or during very bad weather when the Property will not require its complete staff. Should your scheduled shift be canceled, you will be notified that your services will not be needed for a particular time and you will not be expected to come to work. You will not be paid for that canceled shift.

## **Break and Meal Period**

Federal law does not require meal periods or breaks. However, TPI Hospitality's policy requires that associates receive restroom time and sufficient time to eat a meal. Time to use the nearest restroom will be provided within each four (4) consecutive hours of work. Mealtime applies to associates who work eight (8) or more consecutive hours. If a break is less than 20 minutes in duration it will be counted as hours worked. Associates under the age of 16 may work no more than four (4) hours without an uninterrupted 30-minute break. All associates are required to clock out during ANY break period. Your supervisor will approve all breaks in accordance with business demands. These rules for breaks exclude salary compensated Management.

In Minnesota, associates enjoy a 50% discount on and off duty for an associate-only meal, up to a \$10 maximum discount. This excludes all delivery items and alcoholic beverages.

In Florida, associates enjoy a 50% discount while on duty for an associate-only meal, and a 25% discount while off duty for the associate or the associate and one guest. At the sole discretion of the General Manager, a salaried manager could potentially be authorized to have their 50% meal directly billed to the Hotel.

If an associate is required to work through a meal period, cannot be relieved, or is interrupted after less than 20 minutes of break time, they will be compensated for the entire period. Only associates required to work in a position whereby they are unable to be relieved regularly for a meal period (example: Night Auditor) can eat in the area where they work.

All associate meals must be rung up at the cashier's station before a cook can prepare it. All associates should have their paid receipt in their possession while on break. The designated area for your meal break will be identified for you during orientation. Eating from the hotel breakfast area is not allowed.

**SMOKING OR VAPING MAY ONLY BE DONE IN THE DESIGNATED ASSOCIATE AREAS AT THE DESIGNATED TIMES.**

## **Breastfeeding Policy**

Your property will provide nursing mothers with the reasonable break period and private location with an electrical outlet necessary to express breast milk for her less than one-year old nursing child. This location will be free from co-worker or public intrusion and out of view from others. This location will not be in a restroom and will generally be located in a vacant guest room at the GM's discretion when possible.

## **Family and Medical Leave (FMLA)**

Leaves of absence normally are available only for specific medical or military reasons.

Family and Medical Leave Act (FMLA)–This policy explains your leave rights under the Family and Medical Leave Act (FMLA). Under this policy, TPI Hospitality will grant eligible associates up to a total of 12



workweeks unpaid leave of absence during the applicable twelve-month period for qualifying family and/or medical reasons. The applicable twelve-month period is determined by one's anniversary date.

a. Eligible Associates

You are eligible for FMLA leave if on the date your FMLA leave would start you have been employed by TPI Hospitality for at least 12 months; and worked at least 1,250 hours of service during the twelve-month period immediately preceding the commencement of the leave.

b. Qualifying Family and/or Medical Reasons

If you are eligible for FMLA leave, then you may take up to a total of twelve (12) work weeks unpaid leave of absence in an applicable twelve (12) month period because of the birth of your child or the placement of a child with you for adoption or foster care; or in order to care for your spouse, child, or parent who has a serious health condition; or because of a serious health condition that makes you unable to perform the functions of your position; or because of any urgency arising out of the fact that the spouse, child or parent of an associate is on active duty (or has been notified of an impending call or order to active duty) in the Armed Forces in support of a contingency operation.

c. FMLA Leave Benefits and Restrictions

During the period of your FMLA leave, TPI Hospitality will maintain your coverage under its group health plan on the same terms as if you had continued in employment for the duration of your leave. Please contact your Supervisor to make arrangements for you to pay your premiums during your absence.

During any unpaid portion of your FMLA leave, you will not accrue any benefits such as PTO pay, but you will retain all benefits accrued before your leave started or to an equivalent position. Associates who may qualify for the FMLA leave must provide TPI Hospitality with reasonable notice of any changed circumstances that may affect the leave within thirty (30) business days of the changed circumstances. While you are on FMLA leave, TPI Hospitality may require you to periodically report on your status and intention to return to work. Failure to return to work will be considered voluntary resignation. At the end of your FMLA leave, TPI Hospitality will restore you to the position you held before your leave started or to an equivalent position unless you are a key associate. While you are on FMLA leave, you may not engage in other work or employment. If you do so, you will be considered to have violated the terms of your leave and to have voluntarily terminated your employment. Associates requesting an FMLA leave should contact their supervisor or General Manager for the appropriate forms that need to be completed. Associates are not eligible to receive any bonuses while on any Leave of Absence.

NOTICE: The above information is intended as an overview only. The specifics of FMLA will be made available upon request.

**Parenting Leave Act (Minnesota only)** - This policy provides parenting leave to eligible associates in conjunction with the birth or adoption of a child. Associates can also use their PTO for an illness of or injury to the associate's child, adult child, spouse, sibling, parent, grandparent, or stepparent. Minnesota associates are eligible for Parenting Leave of up to twelve (12) weeks if 1) You have been employed by TPI Hospitality for at least twelve (12) consecutive months immediately preceding your request and 2) During those twelve (12) months you worked an average of twenty (20) hours per week. If you are eligible for Parenting Leave and are also eligible for FMLA Leave, your Parenting Leave and your FMLA leave run concurrently and not consecutively under most circumstances. Under this policy you will be entitled to an unpaid leave of absence for twelve (12) weeks. Your leave will run concurrently with any other paid or unpaid leave.

**School Conference Leave** - An associate may take up to sixteen hours (16) of unpaid leave per calendar year to attend school conferences or classroom activities related to the associate's child. This applies only if such events cannot be scheduled during non-work hours. If attendance at such activities is foreseeable, you should provide your Supervisor with reasonable prior notice of the leave.

**Military Leave** - The Company complies with the Uniformed Services Employment and Reemployment Rights Act of 1994 (USERRA). This law requires employers to grant qualified associates a leave of absence for required voluntary or involuntary military service. Contact your direct supervisor if you need a military leave of absence.

## **Prohibiting Weapons in the Workplace Policy**

TPI Hospitality prohibits all associates from carrying, concealing, using or storing any weapons on Company premises or in vehicles the Company provides to associates. Associates are also prohibited from carrying, concealing, using or storing any weapon at any time the associate is acting within the course and scope of his or her employment, regardless of whether the associate is on Company premises or whether the associate is using a Company-provided vehicle. Company "premises" includes all buildings, storage areas, work areas and outdoor areas the Company uses for business purposes. A "weapon" includes, without limitation, guns, pistols, knives, clubs and any other item the purpose of which is to threaten or inflict bodily harm upon any person. This policy applies, without limitation, to concealed weapons for which a valid permit has been issued and to all persons to whom a valid permit to carry a concealed weapon has been issued. An Associate who has a valid permit to carry a concealed weapon may, when not acting within the course and scope of his or her employment, carry or possess that weapon in the parking area the Company provides for associates, but in no other location on the Company's premises. Weapons other than concealed weapons for which a valid permit has been issued are prohibited in the associate parking area. Associates who violate this policy are subject to disciplinary action up to and including termination of employment. In the event of a suspected violation by any associate, guest or member of the general public, please contact your General Manager, your Operations Senior Vice President or the Manager-on-Duty for handling.

## **No Solicitation Policy**

The No Solicitation Policy minimizes unnecessary disruption of associates' work during the workday and encourages orderly and neat work surroundings. You are not permitted to sell merchandise or distribute literature in your work area or in the work areas of other associates during business hours. Non-associates are prohibited from selling merchandise or distributing literature of any kind on Company property.

## **Performance & Compensation Plan**

### **Pay System Policy**

It shall be the policy of TPI Hospitality to develop and maintain a pay system for all associates which incorporates the following characteristics:

The system shall be equitable throughout TPI Hospitality, recognizing the complexity of jobs by placing them in appropriate wage and salary classes.

Wage and salary classes shall be established at a level which is competitive in the appropriate labor market. Training wages for associates under 20 years of age or Youth wages for associates under 18 years of age may apply. Annually all ranges shall be analyzed to ensure they are competitive and appropriate. Any adjustments which are to be made to the ranges shall be made once each year on January 1st.

The salary system must be fiscally responsible and allow TPI locations to operate competitively. The pay system shall recognize and reward the performance of individual associates.

The pay system shall not discriminate against individuals based on their race, color, religion, gender,

gender identification, national origin, age, status with regard to public assistance, disability, marital status, sexual orientation, or any other characteristics protected by law. The pay system shall be user friendly. It shall be easy to understand and implement.

## Performance Appraisal Policy

It is recognized by the management of TPI Hospitality that associates work at a variety of performance levels. It is the policy of TPI Hospitality that those associates who consistently show significantly superior performance be recognized for that performance.

All new tipped and non-tipped associates shall receive performance appraisals prior to the end of the 90-day introductory period. No pay adjustments will be made at this time.

Thereafter, performance appraisals shall be conducted once each year by the associate's Supervisor within 10 days before or after the associate's anniversary date. Associates in positions with a job code of 8 and above and Delivery Managers shall also receive a non-financial performance appraisal at the 6-month interval opposite the associate's anniversary date. The performance appraisal shall be an evaluation of an associate's performance of his or her job duties. Pay increases may be granted at the anniversary depending on the performance level of the associate. A performance appraisal interview must take place between the associate and his or her Supervisor at the time specified above.

Temporary and Seasonal Associates shall not receive annual performance appraisals or pay adjustments. The pay rate of Servers, Delivery and Bartenders shall always remain the wage minimum.

In the event that an associate performs more than one job, e.g., Room Attendant, Laundry Attendant, etc., only one appraisal shall be conducted but shall be reviewed by the Supervisor of each job and the performance appraisal shall determine pay adjustments in the respective jobs. Any pay changes necessitated by a performance appraisal shall be instituted on the first day of the payroll period following the appraisal.

**SPECIAL NOTE:** The rate of pay for associates may not exceed the maximum of the job's pay range. To allow for an increased wage, an associate is encouraged to seek out a new role within TPI that will provide additional responsibilities as well as an increased wage.

An associate's performance rating falling below 83 will trigger an immediate Performance Improvement Plan which may in some cases include termination of employment from TPI Hospitality. If it is decided to retain this associate's employment, objectives for improvement shall be established and documented and another performance appraisal shall be completed within 30 to 90 days. If the associate's performance rating is 83 or more on the second performance appraisal, he/she shall go back to the performance appraisal schedule described above. If the associate's rating is less than 83 on the second performance appraisal, that associate will be immediately terminated from employment with TPI Hospitality.

Procedure for performance appraisal:

1. The Supervisor and associate shall independently rate the associate's performance for each core value on separate performance appraisal forms.
2. Prior to meeting with the associate, the Supervisor shall review the completed performance appraisal with the Supervisor's Supervisor.
3. The Supervisor and associate shall then meet to compare ratings and set objectives for improved performance.
4. The completed performance appraisal shall then be forwarded to the TPI Administrative Office. If retroactive pay is required due to an unavoidable situation, the retroactive pay must be approved by TPI's Chief Operations Officer.

PERFORMANCE INCREASE SCHEDULE - FISCAL 2023

Appraisal Score	Performance Increase %
Outstanding:	
100	5.00%
99	5.00%
98	5.00%
97	5.00%
96	5.00%
95	5.00%
94	5.00%
93	4.50%
92	4.00%
Commendable:	
91	3.75%
90	3.50%
89	3.25%
88	3.00%
Acceptable:	
87	2.80%
86	2.70%
85	2.60%
84	2.50%
Action Required:	
83	0.00%
82	0.00%
81	0.00%
80	0.00%

**Promotion Pay Policy**

Associates promoted to a position of greater responsibility will receive an increase of 5%, or move to the starting rate of the new range, whichever is greater (if prior experience exceeds the minimum requirements, refer to "Credit for Experience Policy"). When a promotion occurs, an associate's anniversary date shall remain the original hire date.

The date that promotion pay increases go into effect shall be the beginning of the first payroll period following the assumption of the duties of the new job.

Associates who are promoted shall receive an introductory performance appraisal within 90 days of beginning the new position. At that time no pay changes shall take place.

In the event that the promoted associate's anniversary performance appraisal date falls within 90 days following a promotion, that performance review shall be conducted 90 days after the date of promotion and at that time pay changes may take place. Thereafter, performance reviews shall be conducted on the original start date if applicable.

Definition of Promotion: A promotion is defined as the assumption of the duties of a job involving greater responsibility and is in a higher salary range.

## **Transfer Pay Policy**

When an associate of TPI Hospitality transfers from one job to another, the rate of pay and anniversary date shall remain the same.

Associates who are transferred shall receive a performance appraisal within 90 days of beginning the new position. At that time no pay changes shall take place, except in the event that a performance appraisal as proscribed by the Performance Appraisal Policy falls within 90 days following a transfer. Any pay changes associated with that appraisal shall be instituted on the first day of the next payroll period following the 90 days, and be retroactive to the date during the 90-day period proscribed by the Performance Appraisal Policy.

**Definition of Transfer:** A transfer is defined as the assumption of the duties of a job involving comparable responsibility and/or training to that of the previous job, and which is in the same salary range for a period of 180 days or more.

## **Demotion Pay Policy**

When an associate is assigned to a job requiring less skill, knowledge, etc. than the present job (whether this new assignment be by the associate's choice or by the Management), the rate of pay for the new job will be established using the position of the old wage relative to its position in that old range, and applying that relative position to the new range (If deemed necessary the "Credit for Experience Policy" may be utilized with VP approval). When an associate is demoted, the anniversary date shall remain the anniversary of the original hire date.

The date the demotion pay decrease goes into effect shall be the beginning of the first payroll period on or following the assumption of the duties of the new job.

Associates who are demoted shall receive a performance appraisal within 90 days of beginning the new position. At that time, no pay changes shall take place, except in the event that a performance appraisal as proscribed by the Performance Appraisal Policy falls within the 90-day period following the demotion. Any pay changes associated with that appraisal shall be instituted on the first day of the next payroll period following the 90 days, and be retroactive to the date during the 90-day period proscribed by the Performance Appraisal Policy.

**Definition of Demotion:** A demotion is defined as the assumption of the duties of a job involving less responsibility and/or training than that of the previous job, and which is in a lower salary range for a period of 180 days or more.

## **Geographic Pay Schedule Adjustments Policy**

The pay rate of associates who move from one TPI Hospitality location to another, which has a different geographic pay schedule, shall move to the same relative position in the new pay range as in the old.

## **Professional Conduct**

As an associate of TPI Hospitality, your primary responsibility is to perform your job in an efficient and productive manner. You are expected to meet reasonable standards of work performance and personal conduct, including obeying Company rules, adhering to safe working practices, cooperating with management and fellow associates.

## **Associate Conduct Policy**

These associate conduct rules are placed in written form for the benefit of you and your fellow associates so that all associates will receive the same fair treatment. Understandably, guidelines and expectations

for associate performance and behavior are necessary to have an efficient and successful operation. Your Property's rules and regulations are placed in written form known as the Associate Conduct Code. The following is a list of acts or conduct that may be considered grounds for discipline or dismissal. This list is not intended to be all inclusive. It is merely intended to provide you with examples of the types of conduct that will result in disciplinary action up to and including termination of employment.

Please carefully read the Associate Conduct Code. You will be asked to sign a copy of the code acknowledging your understanding of the rules and regulations. The signed copy will be maintained as part of your personnel file. Additionally, copies of the Associate Conduct Code are posted on various department bulletin boards throughout your Property. Other rules required by Federal/State or local laws or rules which apply only to your Property may be posted by your Management. All such associate actions must center around our goals for customer service and teamwork.

TPI Hospitality specifically reserves the right to discipline or dismiss any associate with or without cause whenever in the judgment of the Employer such action is justified. It should be understood that employment with TPI Hospitality is "At Will". This means that associates have the right to terminate their employment at will whenever they choose, for any reason. Likewise, TPI Hospitality has the right to terminate associates whenever it chooses for any reason.

VIOLATION OF ANY ONE OF THE FOLLOWING ACTS MAY BE REASONS FOR DISCIPLINARY ACTION UP TO AND INCLUDING TERMINATION OF EMPLOYMENT.

- 1) Any falsification or alteration of property records, including employment application.
- 2) Possessing dangerous or deadly weapons on property premises or while off property premises in performance of property duties.
- 3) Reporting for work under the influence of intoxicants, drugs, cannabis flower, cannabis products, lower-potency hemp edibles, or hemp-derived consumer products; or drinking alcoholic beverages, using drugs, or the possession of either while on property time or premises.
- 4) Refusing to obey an order of a Supervisor (Insubordination).
- 5) Coercion, intimidation or threats against guests, Supervisors or fellow associates.
- 6) Disrespectful or discourteous conduct to guests, Supervisors or fellow associates.
- 7) Gambling or fighting on Company premises.
- 8) Theft, misappropriation, misuse or willful destruction of associate's, guest's, or Company property, or unauthorized removal of such, including found items.
- 9) Interfering with, hindering or altering work schedules without approval of Supervisor.
- 10) Absent from scheduled work without approval.
- 11) Failure to cooperate with Company officials in any investigation including the investigation of any suspected criminal act affecting the Company, its business or its property.
- 12) Any conduct on or off Company property which in judgment of Management will impair associate's effectiveness in performance of his or her duties or adversely affect guests' attitude to the Property.
- 13) Violation of any local, state or Federal law, rule or regulation which is of such a nature as in the judgment of Management will impair associate's effectiveness in the performance of duties or which will adversely affect guests' attitude toward the Property.
- 14) Smoking or vaping of any kind in other than designated areas and times.
- 15) Unauthorized use of the telephone. Personal calls and visits are discouraged on or off duty.
- 16) Parking motor vehicles in other than area designated by Management.
- 17) Failing to abide by clock rules, sign-in, sign-out procedures; falsification of time card, working overtime without Management authorization; stopping work early without Management authorization.
- 18) Excessive absenteeism or tardiness.
- 19) Dining or snacking at any time other than during designated breaks, meal periods or in areas other than those designated by Management. You must have proof of a paid meal ticket.
- 20) Failing to perform work or job assignments satisfactorily and efficiently.

- 21) Unauthorized absence from assigned work area or being in an unauthorized area.
- 22) Failing to observe established health, fire and safety practice. Failure to report unsafe actions of other associates to Management or any injuries sustained while on duty.
- 23) Failing to exhibit a neat businesslike appearance and high degree of personal cleanliness at all times. Failure to wear prescribed uniform and approved name badge, both if applicable.
- 24) Unauthorized soliciting on Property premises during active working time. Unauthorized distribution of literature of any description in working area. Unauthorized posting or removal of notices, signs, memorandums or writing in any form on the bulletin board, Company property or guest's property.
- 25) Making or publishing false, vicious or malicious statements concerning an associate, Supervisor, the Property or its food, beverages or services.
- 26) Discussing confidential Company information in public areas where guests could overhear conversation.
- 27) Unauthorized presence at guest functions or on premises, including guest rooms, dining rooms, lounge or swimming pool when on or off duty. General Manager's prior approval is required.
- 28) Giving out confidential property information without authority.
- 29) Entering or exiting the building through other than Management designated door when reporting to or leaving work.
- 30) Charging by associate of any items (food, liquor, dry cleaning, etc.).
- 31) Cashing of personal or payroll checks.
- 32) An associate is not allowed to engage in any behavior that could be considered inappropriate and/or unprofessional with fellow associates or guests on or off duty on Company property.
- 33) Using Cell Telephones to include talking, texting, internet surfing, taking pictures, playing games or videotaping while on duty except for authorized users who are the General Manager, the Director of Sales, the Director of Catering, the Assistant General Manager, the Maintenance Engineer, the Executive Housekeeper and the F & B Director.
- 34) Violation of any Company policy.

## **Disciplinary Procedures**

Not obeying your Property or TPI Hospitality rules, not adhering to safe working practices, not cooperating with management and fellow associates are examples of offenses that may result in discipline from verbal reprimand to discharge. The degree of discipline will be determined according to the seriousness of the offense and circumstances surrounding the matter. Adherence to certain disciplinary steps is at Management's discretion.

## **Alcohol Awareness Program**

It is the policy of TPI Hospitality, its Owner and Managers that alcoholic beverages are sold in accordance with all applicable laws as well as in a professionally and socially responsible manner. These concerns exist not only because of a recognition of the liability which can potentially arise from the sale of alcoholic beverages, but also reflect a recognition of the social responsibility to prevent the unfortunate results that too frequently occur from excessive drinking and driving. Accordingly, separate policies have been established governing the sale and use of alcoholic beverages in our hotels, lounges/bars, in banquet functions held at our hotels and at sponsored events for associates.

It is the responsibility of all associates to acquaint themselves with these policies as they pertain to their particular jobs. At an appropriate time during your training, you will review the appropriate policies. These policies include completing the Daily Alcohol Service Acknowledgement Form during each work shift. These policies are to be adhered to at all times and your cooperation is appreciated. Any violation of TPI Alcohol Policies and/or City/State laws will result in serious disciplinary actions that may include immediate termination. If clarification is necessary, consult with your direct supervisor, on-property Human Resources associate, General Manager, or Operations Senior Vice President.

## Sex Trafficking Training

It is the policy of TPI Hospitality that all TPI associates complete the required new hire and annual Sex Trafficking Training. This policy requires that:

- All new associates must complete the training within 90 days of hire.
- All associates must retake the training every year, typically during TPI's annual Safety Month event.
- Each property must display the required posters in a location where all staff will see it.

The Sex Trafficking training consists of watching a video and following along with the associated workbook. Completion of the training should be recorded during the orientation process on the TPI New Hire Checklist, or on the Annual Sex Trafficking Acknowledgement form located in the property's Life Safety binder. Both the videos and the workbooks are available on TPI's safety website located at [www.tpisafety.com](http://www.tpisafety.com).

## Harassment, Offensive Behavior and Non-Discrimination Policy

It is the policy of TPI Hospitality to maintain a work environment that is free of offensive conduct, harassment, discrimination, and actions, words, jokes, or comments based on, but not limited to, an individual's gender, gender identification, race, color, age, religion, creed, national origin, marital status, status with regard to public assistance, disability, sexual orientation, genetics or any other legally protected characteristic. Harassment (both overt and subtle) is a form of associate misconduct that is demeaning to another person, undermines the integrity of the employment relationship and is strictly prohibited. It is also the policy of TPI Hospitality to maintain a work environment that is free of offensive conduct and harassment in general, regardless of whether it is based on a legally protected characteristic. Offensive conduct includes any act in which a person is hurt or intimidated through the use of physical contact or verbal harassment, wherever it occurs. This includes, but is not limited to, harassment, verbal and/or physical abuse, neglect, threatening acts or words, bullying, intimidation, fear, and physical assault. Harassment is the act of someone creating an intimidating, offensive or hostile work environment through unwelcome words, actions or physical contact, whether or not it results in physical harm.

Sex-based offensive conduct or harassment includes unwelcome physical or verbal conduct relating to an individual's gender or directed at an individual because of gender, unwelcome sexual advances, requests for sexual favors, sexually motivated physical conduct or other verbal or physical conduct or communication of a sexual or gender biased nature when:

- Submission to that conduct or communication is made a term or condition, either explicitly or implicitly, of obtaining or retaining employment;
- Submission to or rejection of that conduct or communication by an individual is used as a factor in decisions affecting that individual's employment;
- That conduct or communication has the purpose or effect of substantially or unreasonably interfering with an individual's employment or creating an intimidating, hostile or offensive employment environment;

Examples of sexual harassment may include, but are not limited to:

Unwelcome verbal remarks, jokes or innuendoes of a sexual nature or based upon gender;  
 Unwelcome, sexually motivated or inappropriate patting, pinching or other physical contact;  
 Unwelcome pressure for sexual activity;  
 Unwelcome sexual behavior or words, including demands for sexual favors, accompanied by implied or overt promises or preferential treatment with regard to an individual's employment or access to public services or public accommodations;  
 Any sexually motivated unwelcome touching;  
 Distribution or display of written materials, pictures or other graphics of a sexual or gender biased nature;  
 Other unwelcome behavior or words directed at an individual because of gender.



Any associate who has been the victim of or who has witnessed employment related discrimination, harassment or offensive conduct, or inappropriate actions, words, jokes or comments, by another associate, a vendor, a guest or any other person should promptly report the matter to a Supervisor. If a Supervisor is unavailable or the associate believes it would be inappropriate to contact the immediate Supervisor, the associate should contact your Property's Operations Senior Vice President or the TPI Hospitality Chief Human Resources Officer.

Associates can raise concerns and make reports without fear of reprisal. Any complaint of harassment, discrimination or offensive conduct will be investigated in a thorough, confidential manner, after which timely and appropriate action will be taken. Anyone engaging in harassment (including sexual harassment), discrimination, or offensive conduct will be subject to disciplinary action, up to and including termination of employment.

## **Human Rights Policy**

TPI Hospitality supports and protects human rights in all aspects of our Company's operation. As a Company committed to bettering our associates and the communities in which they live, we believe that strong ethics and good business go hand in hand and we are committed to complying with the laws and regulations of the jurisdictions in which we operate. We believe that our actions should always create win-win situations for all parties involved. This Human Rights Policy demands that we:

- Support the protection of human rights
- Provide a safe and healthy working environment for our associates
- Conduct ourselves in alignment with TPI Hospitality's nine core values
- Do not support forced and compulsory labor or the exploitation of children
- Comply with all wage and compensation requirements as defined under applicable local, state and national laws and regulations, including those relating to minimum wages
- Support the elimination of employment discrimination and promote diversity in the workplace
- Provide opportunities for our associates to enhance their careers
- Will not allow physical punishment or abuse of any associate
- Promote fair competition
- Condemn corruption
- Conduct our business with honesty and integrity
- Develop and implement ongoing company procedures to ensure we comply with this policy

TPI Hospitality maintains an Open-Door Policy to assure that associates are able to report any abuse of the Human Right Policy. We believe that all associates should enjoy a comfortable, supportive and rewarding work experience.

## **Affirmative Action Policy**

It is the policy of TPI Hospitality to provide equal opportunity and affirmative action to all of our associates and applicants based upon federal, state and local laws. TPI does not tolerate and will not engage in any forms of prohibited employment discrimination, including race, color, non-disqualifying handicap, religion, creed, national origin, age, status with regard to public assistance, sex, marital status, sexual orientation, genetics or any other characteristics protected by law. TPI strives to employ a diverse workforce. This policy applies to all employment actions including, but not limited to, recruitment, selection, training, transfer and pay.

All TPI associates are personally responsible for complying with this policy, especially those involved in the screening and hiring of potential new associates. TPI is fully committed to allocating the resources necessary to meet and exceed our Equal Employment Opportunity/Affirmative Action requirements. Associates who do not comply with this policy will face disciplinary action up to and including termination of employment.

If you believe you have received treatment from a TPI associate contrary to this policy, immediately notify any TPI supervisor or the TPI Chief Human Resource Officer.

## **Nepotism – Close Relationships While at Work**

The employment of associates in a close, personal relationship can potentially cause various problems including, but not limited to, charges of favoritism, conflicts of interest, family discord and scheduling conflicts that may work to the disadvantage of both TPI and the associate. We recognize that despite their qualifications, having a close relationship in a supervisory role might raise serious questions regarding objectivity, or the appearance of objectivity, while executing performance appraisals or making objective evaluations of an associate's day-to-day work performance. TPI is committed to hiring and retaining highly qualified associates, and it is in this spirit that the following supervisory influence stipulation has been established:

For the purpose of this policy, the term close relationship shall include all of the following: an associate's spouse, mother, father, son, daughter, sister, brother, mother-in-law, father-in-law, sister-in-law, brother-in-law, son-in-law, daughter-in-law, stepparent, stepchild, aunt, uncle, nephew, niece, grandparent, grandson, granddaughter, cousin, domestic partner (a person with whom the associate's life is interdependent and who shares a common residence) and, a daughter or son of an associate's domestic partner. In addition, two associates who are in a committed dating situation will be considered to be in a close relationship. TPI may allow these types of close relationships to exist as long as each of the following criteria is met:

- An associate may not have direct supervisory influence, either actual or perceived, over a close relative's performance appraisal.
- An associate may not have direct supervisory influence, either actual or perceived, over a close relative's schedule.
- The close relationship does not, as determined by TPI, create a disruption or potential disruption in the work environment, or create an actual or perceived conflict of interest.

If any of the above situations exist, TPI will require that accommodations are made to eliminate the supervisory influence and assure that all three of the expectations listed above are satisfied. These accommodations may include relocation, reassignment of duties, resignation or termination. All accommodations require approval of TPI's Chief Human Resources Officer and must be documented in each associate's personnel file using Ops Manual Form 3.23, *Accommodation for Close Relationships*. Should close relationships addressed within this policy be identified with candidates for employment or current associates, the matter should be immediately reported to the Chief Human resources Officer and procedures will be followed:

A determination will be made whether the relationship is subject to TPI's *Nepotism – Close Relationships While at Work* policy based on the definition of a close relationship as described above.

- If the relationship is determined to fall within one or more of the conditions described in this policy, the Senior Vice President of Human Resources, in consultation with the affected associates and TPI's Chief Human Resources Officer, will attempt to resolve the situation through the transfer of one associate to a new position or identifying some other action (for example, supervisory reassignment) which will correct the conflict or issue identified. If accommodations are not feasible then, with the affected associate's feedback, the Senior Vice President of Human Resources, in consultation with TPI's Chief Human Resources Officer, shall determine which associate must resign in order to resolve the situation.
- TPI reserves the right to exercise appropriate managerial judgment to take such actions as may be necessary to achieve the intent of this policy. TPI reserves the right to vary from the guidelines outlined in this policy to address unusual circumstances on a case-by-case basis.
- It is the responsibility of every associate to identify to TPI's Chief Human Resources Officer any potential or existing close relationship as defined above. Any associate who fails to disclose a close relationship covered by this policy will be subject to disciplinary action up to and including termination.

## Appearance Standards (Uniform/Grooming)

While working at your property, you are representing both your brand and TPI Hospitality. Due to our associates' frequent contact with guests and co-workers, we want to promote a safe work environment and display a professional image at all times. TPI has established an Appearance Standards policy that is monitored on a daily basis. Appearance can have a profound impact on your hotel or restaurant as well as your own personal image. TPI associates should display a neat, professional appearance while at work by following these simple guidelines.

- Hair should remain clean and neatly groomed. Long hair should be restrained or neatly tied up. Associates working in food and beverage areas should pull back and/or cover their hair and wear a hair restraint when necessary.
- Fingernails should be neatly trimmed and kept clean at all times. For the safety of our guests, local health codes require that associates producing or handling food should not wear artificial fingernails and should not wear any nail polish.
- Jewelry should be worn in moderation, with consideration given to guest perception and associate safety. Associates who produce or handle food should not wear any rings except a plain band. TPI Hospitality reserves the right to prohibit an associate from displaying tattoos or body piercings that are not consistent with the organization's branding, image, values, and mission.
- Uniforms may be provided in some departments. Your direct supervisor will communicate the uniform expectations in your department. Associates are responsible to maintain their uniform in a clean and neat manner throughout their shift. Nametags should be clearly visible if required. All associates working in a food & beverage area or in the front desk, housekeeping, or maintenance areas, must wear certified non-slip shoes. Certified non-slip shoes can be purchased locally or through the TPI Hospitality Shoes for Crews program via payroll deductions.
- Personal hygiene practices are expected for all associates to ensure a positive personal appearance and to avoid offending others. Associates are expected to bathe regularly, use deodorant, and maintain healthy personal hygiene practices.
- Perfumes and colognes should be used sparingly and should not be overpowering.

Any exceptions to these policies for medical or religious reasons must be presented to Human Resources in writing for review and determination. Associates who fail to meet the expectations of TPI's Appearance Standards policy will be provided with an opportunity to take corrective action before any disciplinary steps are taken. Ongoing failure to follow the policy may result in disciplinary actions up to and including termination.

Conveying a clean professional look to our guests and co-workers is an important part of the TPI culture. Our core values allow us to STAY SHARP, but our Appearance Standards policy allows us to LOOK SHARP!

## E-Mail Policy

TPI urges associates to use discretion while utilizing company e-mail. These items are strictly prohibited:

- Communications that would compromise the TPI work environment including harassing, obscene, vulgar, or offensive comments or references.
- Disparaging communications which are based on race, color, religion, gender, gender identification, national origin, marital status, age, sexual preference, or any other characteristics protected by law.
- Communications of proprietary or confidential information such as strategic business plans, financial projections, individual pay rates, etc. to other than TPI addresses.
- Solicitation of associates, including solicitation for commercial ventures, religious, social, or political causes, fundraisers, or other outside organizations.

When composing and transmitting E-mail messages, keep in mind that the communication may be stored and could be acquired and used in legal proceedings. E-mail communications are not private

and should not be considered private. Furthermore, passwords and pass codes are used for the benefit of the company and its associates; and they do not ensure privacy. TPI may override individual pass codes or passwords and require associates to disclose individual passwords or pass codes.

E-mail communications, including all messages sent, received, or stored are the sole property of TPI. In order to assure the proper and authorized use of its e-mail system, TPI reserves the right to monitor the e-mail system, including stored communications. Prior to using the TPI e-mail system, each associate knowingly and voluntarily consents to being monitored as described above and acknowledges TPI's right to conduct such monitoring. Any e-mail messages sent externally which refer to TPI in a way that could be interpreted as stating a Company position, policy, or viewpoint, must be approved in advance by the Chief Operations Officer. Any associate who fails to comply with this policy is subject to disciplinary action, up to and including termination.

## Social Media Policy

While employed at TPI Hospitality, guidelines for functioning in an electronic world should reflect the values, ethics and confidentiality policies TPI associates are expected to adhere to on a daily basis. Social media venues can be a very effective means of communicating with the world around us. They can also create a very uncomfortable situation when used inappropriately.

Examples of social media could include, but are not limited to Facebook, Twitter, Instagram, YouTube, LinkedIn, TikTok, blogging or photo sharing. Remember, your responsibility to TPI does not end when you are off the clock. For that reason, this policy applies to both your use of social media in your role at TPI or for your personal use.

What you should do:

- *Protect privacy:* Avoid sharing any personal information about you, your co-workers, your guests or TPI.
- *Clarify your viewpoint:* Exercise sound judgment and discretion to ensure a distinct separation between your personal views and the views of TPI
- *Honor our differences:* Live our values. TPI will not tolerate any form of discrimination (including age, sex, race, color, creed, religion, ethnicity, sexual orientation, gender, gender identification, national origin, citizenship, disability, genetics or marital status or any other legally recognized protected basis under federal, state, or local laws, regulations or ordinances).
- *Be honest:* If you post positive reviews or comments about any TPI hotel or restaurant, you must always identify yourself as a TPI associate.

What you should never disclose:

- *The numbers:* Non-public financial or operational information should never be shared. This includes strategies, forecasts and most anything with a dollar-figure attached to it. If it's not already public information, it's not your responsibility to make it so.
- *Personal information:* Never share personal information about you, your co-workers, your guests or TPI.
- *Confidential Information:* Do not publish, post or release any TPI information that is considered confidential or top secret.

Basically, if while in a social media environment, you find yourself wondering if you can talk or record something you learned or experienced at work — don't. Follow TPI's policies and live the company's values and philosophies. They are there for a reason.

## Fraud Policy

What is fraud? How is it defined? What actions and behaviors would be considered fraudulent? Deception and the betrayal of trust are the fundamental elements of fraud and as such it encompasses

much more than just those acts that would constitute theft by deception. The spectrum of fraud is broad, ranging from misrepresenting one's academic credentials on a resume to receiving a gift given by a vendor to influencing a purchasing decision. It must also be understood that deception is all that is required to demonstrate that fraud has occurred regardless of any benefit that may or may not have been received by the person committing the deception.

*Fraud defined:*

The following definition of fraud follows both the traditional legal definitions and the description provided by the Association of Certified Fraud Examiners. Therefore, fraud includes, but is not limited to, any:

- Crime for gain that uses deception as its principal method of commission. Intentional or deliberate act to deprive another of property or money by guile, deception or other unfair means.
- Intentional act or omission designed to deceive others, resulting in the victim suffering a loss and/or the perpetrator achieving a gain.
- Use of one's occupation for personal enrichment through the deliberate misuse or misapplication of the organization's resources or assets.

THE EVENTS THAT MEET TPI'S DEFINITION OF FRAUD ARE BROADLY CATEGORIZED AS FOLLOWS AND ARE FURTHER DESCRIBED BELOW:

*Corruption - Misuse of Entrusted Power for Private Gain:*

Fraud falling into the category of Corruption would include, but shall not be limited to:

- Creation of a conflict of interest (purchase schemes, sales schemes, etc.), bribery (invoice kickbacks, bid rigging, etc.), illegal gratuities, economic extortion.

*Asset Misappropriation- Theft:*

Fraud involving asset misappropriation would include, but shall not be limited to:

- Theft of cash, theft of services, theft of property, billing schemes, falsified wages, expense reimbursement schemes, workers compensation, false refunds, false voids, commission schemes, fraudulent disbursements, payroll schemes, check tampering, false payee or frequency marketing scams.

*Fraudulent Statements Fraud-Misrepresentation:*

Fraudulent statements and misrepresentation would include, but shall not be limited to:

- Asset/revenue overstatements and understatements, fictitious revenues, concealed liabilities and expenses, improper disclosures and improper asset valuations.

Non-Financial actions that constitute fraud would include, but shall not be limited to:

- Employment credentials (resumes and job applications), internal documents, external documents.

Additional actions that constitute fraud would include, but shall not be limited to:

- Any dishonest act, the unauthorized conversion of company funds, securities, property, or other assets with the intent to deny or deprive the business of those assets, impropriety in the handling or reporting of money or financial transactions, disclosing confidential and proprietary information (to include intellectual property) to outside parties, accepting or seeking anything of material value from contractors, vendors or persons providing services or materials to the Company, deliberate misrepresentation of any information or data relevant to the interests of the business.

You will be asked to sign a copy of this policy acknowledging and affirming that you have read, understand, and are in compliance with, TPI's Fraud Policy Statement. In addition, you understand that TPI maintains a zero-tolerance position with regards to fraud and will prosecute all commissions of fraud to the full extent that the law provides. You also acknowledge the following:

1. That as a TPI associate you are individually responsible, and accountable, for preventing and managing fraud within TPI.
2. That you are required to immediately report any suspected fraud to your immediate supervisor, your General Manager, an on-property Human Resources associate, or a member of TPI's senior management or through other designated channels as defined below.

3. You are currently unaware of anyone who is in violation of TPI's Fraud Policy Statement and that consequences are established for refusal to sign this acknowledgement.
4. That TPI commits to protect any associate from retaliation and maintain the confidentiality of any associate wishing to report the misconduct of another associate. Confidentiality, for the purposes of this policy means not divulging the informant's identity to any person other than those having an absolute need for that information. Essentially, the identity of the confidential informant will not be revealed to the associate(s) who are the subject of the information being confidentially provided. Confidentiality can and will be extended upon request provided that the confidential informant was not a party to or the beneficiary of some criminal incident.
5. You understand that unless you can provide sufficient information that will enable management to independently corroborate your allegation, no action can or will be taken against the subject of the information being confidentially provided.
6. You acknowledge that your hotel or restaurant reserves the right to conduct unannounced inspections of any bag, pocket, knapsack, purse, fanny pack, box, brief case, tool box, case, billfold, wallet or container of any type coming onto or leaving the property for the purpose of securing hotel or restaurant property, protecting hotel or restaurant personnel and guests and preventing the transport of any illegal material to or from the hotel or restaurant. Only a department head or higher management are authorized to conduct such inspections. Any associate refusing to allow an authorized member to inspect any type of container or package being carried onto or away from the property will be subjected to immediate disciplinary or administrative action up to and including termination.

#### TPI FRAUD REPORTING:

To communicate either the witness, or suspicion of fraudulent acts within TPI, call the TPITalk Hotline at 1-833-TPITALK (1-833-874-8255), or share your feedback at [www.tpitalk.com](http://www.tpitalk.com).

### **Software Compliance Policy**

Each computer at each location will only use Software that is needed. Contact Corporate Administrative Office 320.235.7207 #101 to purchase all software and hardware. An Inventory spreadsheet will be kept current at Corporate Administrative Office, which will include the program name, version and serial number of each program for each computer. Proof of purchase (Certificate of Authenticity, License and Date) shall be kept at the CAO in the designated Software File.

NO OTHER SOFTWARE PURCHASES ARE ALLOWED (i.e., from OfficeMax, Staples, the Internet, etc.

We shall not permit any Software to be used on or accessed by any equipment other than authorized equipment. We must only install licensed authorized Software on a single computer. We cannot load or copy the same program on more than one computer. By dedicating a license to a particular computer, we are assigning the license exclusively to that computer for an indefinite period of time. A license to use a particular copy of the Software may not be shared or used concurrently on different computers. This licensed software shall be used solely on the authorized equipment and solely for our internal operations relating to the management of the Property. We cannot make or allow others to make copies or reproductions of any Software except as may be required for backup copies. We shall not permit any Software to be used or accessed by anyone other than our associates. Associates are not allowed to bring in or take out Software for our authorized equipment. There will be zero tolerance for the use or distribution of unauthorized Software. Any associate who fails to comply with this policy is subject to disciplinary action up to and including termination. If you are suspicious or become aware of any potential illegal use or distribution of Software you must contact your Operations Senior Vice President or Corporate Administrative Office.

### **Associate Guest Room and Dining Discounts**

Lodging - All CURRENT TPI Hospitality associates are invited to stay at any TPI Hospitality hotel at the following rates when the associate rate is available. Associates must be 18 years of age or have legal

guardian present.

Minnesota:

- \$39 rates at TPI Hospitality hotels when Associate Rate is available.
- \$79 rates for Park-N-Fly when Associate Rate is available.
- \$79 weekend rates at Holiday Inn Arbor Lakes Waterpark Hotel when Associate Rate is available.

Florida:

- 40% discount when reserved through the Margaritaville associate reservation website.

Meals – All CURRENT TPI Associates may enjoy the following discounts while dining at any TPI Hospitality restaurant.

Minnesota:

- 50% discount on and off duty for an associate-only meal, up to a \$10 maximum discount. This excludes all delivery items and alcoholic beverages.

Florida:

- 50% discount while on duty for an associate-only meal.
- 25% discount while off duty available to the associate and one guest.

Contact your immediate supervisor or an on-property Human Resources associate to approve reservations using the TPI Hospitality Associate Discount Form. Hotel franchises may also have discounts available - see your immediate supervisor or an on-property Human Resources associate for details on this benefit. Associates may not stay at a hotel located in the same city as their work site unless weather related and with prior approval from your immediate supervisor. Relocation and/or displacement stays must be approved by your Operations Vice President.

## Guestroom Visitation Policy

TPI Hospitality associates cannot be in guestrooms without prior written approval from the General Manager of the hotel. To receive permission to visit guests in the hotel, please contact your General Manager to complete the proper authorization form. Any associate who fails to comply with this policy is subject to disciplinary action up to and including termination.

## Guest Injuries

If there is an incident involving a guest please notify your Supervisor or the Manager on Duty. Any incident that adversely affects our guests and that may be a potential liability for TPI must have an Incident Report completed and scanned to Corporate Administrative Office immediately. Such incidents may include but are not limited to: Food borne illness, over intoxication, fights, abusive behavior towards guests and staff, slips, falls or biting into foreign objects.

NEVER ADMIT FAULT OR LIABILITY and be sure to get accurate and complete information including witnesses if available.

## Associate Injuries

TPI Hospitality is committed to meeting their obligations under all state workers' compensation laws to provide medical, rehabilitation and wage-replacement benefits to associates who sustain work-related injuries or illnesses. Associates must report all injuries or illnesses to their Supervisor as soon as possible, regardless of severity. Supervisors must scan an Associate's Accident Report to the Corporate Administrative Office within 24 hours.

Work-related illnesses and injuries are not covered under the group health plans. All medical expenses

must be submitted to the workers' compensation carrier. Associates who suffer a work-related injury are expected to return to work immediately unless the treating physician documents a need for them to be absent from work. TPI Hospitality seeks the prosecution of any associates filing fraudulent claims or engaging in other workers' compensation fraud.

## **Safety Policy Statement**

It is the policy of TPI Hospitality that every associate is entitled to a safe and healthy place in which to work. To this end, every reasonable effort will be made in the interest of accident prevention, fire protection and health preservation.

The management concept of TPI Hospitality is production with safety. When production with safety is achieved, production with efficiency is attained simultaneously. We at TPI Hospitality have a basic responsibility to make the safety of human beings a part of our daily, hourly concern. We will be counting on you to do your part in making our program an effective one.

Your property has emergency procedures to follow in case of fire or disaster. All location exits are marked and fire extinguishers are located throughout the facility. You should notify your Supervisor immediately of any on-the-job injuries, no matter how minor. If you have a question about proper safety procedures, such as lifting objects, etc., ask your Supervisor for instructions.

The successful operation of TPI Hospitality will depend not only on sales and service, but also on how safely each job is performed. There is no job so important - or any service so urgent - that we cannot take time to work safely. I consider the safety of our personnel to be of prime importance and I expect your full cooperation in making our program effective.

- Robert Kisabeth, Chief Operations Officer

**TPI HOSPITALITY SAFETY PROGRAM IS INCLUDED WITH THIS ASSOCIATE HANDBOOK. IT IS MANDATORY FOR ALL ASSOCIATES TO READ THIS SAFETY PROGRAM AND FOLLOW THE PRACTICES THEREIN.**



## **TPI HOSPITALITY ASSOCIATE AWAIR SAFETY PROGRAM**

IT IS VERY IMPORTANT TO USE ALL OF THE FURNISHED PROTECTIVE EQUIPMENT  
WHEN AND WHERE AS NEEDED.

ALWAYS REPORT ALL WORK RELATED INJURIES AND ILLNESSES  
IMMEDIATELY TO YOUR SUPERVISOR.

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IT IS EACH ASSOCIATE'S RESPONSIBILITY TO READ THIS SAFETY PROGRAM. PLEASE SEE YOUR IMMEDIATE  
SUPERVISOR OR ON-PROPERTY HUMAN RESOURCES ASSOCIATE WITH ANY QUESTIONS OR CONCERNS.

## **COMPANY POLICY STATEMENT ON SAFETY**

It is the policy of TPI Hospitality to perform our work in the safest manner possible and to maintain the premises in the safest conditions possible.

All associates are expected to follow safe job procedures, maintain safe work areas and to participate fully in our accident control program.

Managers and supervisors are expected to maintain the facilities in safe condition and to ensure, at all times, the safety of our associates and guests.

## **INTRODUCTION**

Each associate of TPI Hospitality, and their safety and health, are of primary importance. This written safety program will be maintained with the objectives of minimizing associate accidents and illnesses and complying with local, state and federal safety regulations.

The full cooperation of management, supervisors and associates is needed in all health and safety matters if we are to attain our goal of minimizing injuries and illnesses. A Safety Committee will be established, which will include management, supervisors and associates to maintain, review, analyze and enforce the Safety Program.

Associates will be notified of any changes or new policies, procedures and training by their supervisor, the Safety Committee, posting on the associate bulletin board or by payroll stuffer.

## **AUDIT**

Our Safety Program is reviewed quarterly by our Senior Management. A minimum of annually, each January, an audit will be conducted by Senior Management and Property Management to ensure all policies are being adhered to. This audit will include looking at the Safety Manual, Written Right to Know Program, Bloodborne Pathogens Procedures and a Property Walk-Through.

## **NEW ASSOCIATE ORIENTATION**

New associates are particularly susceptible to accidents and injuries due to their unfamiliarity with the property and the work environment. Therefore, it is essential that all new associates receive a thorough orientation of their property, their job duties, potential hazards on the job and their responsibilities related to our safety program. Each new associate will receive and sign acknowledgement of TPI Hospitality Safety Manual.

No new associate will begin work without first being given an orientation by a supervisor. Each new associate must be familiar with, and agree to abide by, all policies including safety regulations. Consideration will be given during the orientation to achieving the development of a good attitude and motivation toward safety and the prevention of accidents.

## **PROCEDURE**

Supervisors are responsible for the safety orientation of associates in their department. This orientation must be completed on the first day of employment and must be documented using the Life/Safety Training page in our Associate Handbook and kept on property. The following points must be emphasized and understood by the associate during the orientation process:

- Management and supervisors are sincerely interested in the safety of every associate and are dedicated to providing a safe working environment.
- Accidents may occur, but safe working habits, training and daily awareness by every associate can prevent most of them.
- Every associate is required to report to their supervisor any unsafe condition or actions observed.

- Associates should be trained for their job. Do not proceed on a job if unsure of methods or safety requirements. Ask your supervisor.
- No associate should ever undertake a job that appears to them to be unsafe.
- All injuries, even if they appear slight, must be reported to the supervisor or management immediately.

### **GENERAL MANAGER RESPONSIBILITIES**

- To establish, review and enforce safety rules.
- Be a member on the Safety Committee.
- Implement and review a direct safety incentive program.
- In event of major catastrophe or fatality, proceed immediately to scene and conduct thorough investigation.
- Email the Supervisor's Accident Report form to the Corporate Administrative Office with 24 hours of incident to avoid a fine. Email to [sheryl@tpihospitality.com](mailto:sheryl@tpihospitality.com).
- On lost time injuries, a personal or phone visit is mandatory with each injured associate within three days of injury.
- Stay current with the Corporate Administrations Office on all claims.
- Organize and conduct safety meetings with all associates. Information discussed will be documented, dated and filed with associate attendance sheet.
- Provide facilities which, to the best of its ability, meet the requirements of safety codes of federal, state, city or other agencies.
- Is an Emergency Response Team member.
- Make assignments to Safety Committee having realistic and measurable objectives and completion dates.
- Provide an environment of associate input.

### **SUPERVISOR RESPONSIBILITIES**

- To review, obey and enforce safety rules.
- Have a member on the safety committee.
- To administer all phases of the Safety Program and be responsible for obtaining results.
- Review findings of regular inspections with management and implement corrective actions immediately.
- In event of an accident, will conduct investigation of work site, interview and prepare Supervisor's Accident Report and doctor's slips, etc. with injured associate and review with management within 24 hours. The site investigation report and associate report will be reviewed by the safety committee.
- Inspect the work site to detect hazards and take necessary corrective action. This inspection shall include housekeeping, electrical, mechanical and other equipment, trucks, tools, inadequate guarding, associate's knowledge of safety procedures.
- Supervisors are encouraged to attend first aid classes and/or CPR training annually.
- Maintain first aid kits along with Safety Committee.

### **ASSOCIATE RESPONSIBILITIES**

- To obey and help enforce safety rules.
- Have a member on the safety committee.
- Know the safe method for performing a task or ask a supervisor and follow recommendations.
- Question any procedure you believe is not safe. Seek advice from a supervisor if you see a hazard. Do not go near it. If it is not corrected, bring the hazard to the attention of an Associate Safety Committee member.
- Report any accident to your supervisor immediately.
- We are all in a hurry to get the job done. Remember, an accident slows the job down.
- Use common sense at all times.

## **ASSOCIATE TRAINING**

Documented associate safety training is critical to this property's safety program. It ensures that associates are made aware of workplace hazards and that the appropriate precautions are taken to avoid an accident and/or injury. To satisfy established training requirements the following will be considered:

Training is required in the following situations:

- When new associates are hired.
- When associates transfer to a new work area.
- When associates are required to perform a new job function.
- When associates return-to-work after a long layoff, illness or injury.
- For associates who perform unusual, seasonal or extremely hazardous jobs.
- For all associates, when operations or processes change significantly.
- For all supervisors, managers, and lead associates to ensure they are familiar with **all** safety program elements.
- Whenever mandated by outside regulatory agencies such as OSHA.
- Annually each January refresher training will take place.

All training sessions must be documented on the Life/Safety Training form from the Associate Handbook, indicating who was trained, date trained, who completed the training, and what was covered in the session and kept on property.

## **SAFETY COMMITTEE**

- The function is to create and maintain an active role by everyone in safety and to reduce accidents.
- The Safety Committee is made up of management, supervisors and associate personnel. Each member will be appointed and hold his/her seat on the committee for one year.
- The duties of the committee are to identify the hazards in the workplace and recommend corrections of these hazards, think of ways to remind all workers about safety and possibly recommend disciplinary action when the rules are broken.
- The Committee is supported by the property, CEO and management.
- Reviews the Right-to-Know program.
- Maintains the Respiratory program.
- Maintains the Sharps containers.
- Conduct property walk-through.
- Complete the Safety Inspection Checklist.
- The Safety Committee will meet at least monthly at a specific day and time so all members can be present at this regularly scheduled event.
- A record should be kept of each safety meeting held, including the date, names of those present and a brief description of the topics discussed and incident reports reviewed. A copy of these minutes should be forwarded to [kathy@tpihospitality.com](mailto:kathy@tpihospitality.com).

## **GENERAL SAFETY RULES**

- USE COMMON SENSE AT ALL TIMES.
- In case of sickness or injury, no matter how slight, report it at once to your supervisor.
- Never attempt to treat your own or another associate's injury or try to remove foreign objects from the eye.
- Running on the premises is not permitted.
- Horseplay, throwing objects and scuffling are very dangerous and will not be tolerated.
- Never distract the attention of another associate, as you might cause injury. Wait until they have finished what they are doing before interrupting them.
- Be very careful with rings, chains, scarves or loose articles of clothing which might catch on

moving or stationary objects, causing injury.

- Before using any ladder, make sure it has good safety feet and is free from cracks, broken rungs or other defects. When there is any danger of slipping, have another worker hold the ladder.
- Do not attempt to lift, push or move objects that may be too heavy to lift. ASK FOR HELP when you need it. Learn to lift the right way to avoid strains.
- Good housekeeping is a must. There should be no debris around your area of responsibility.
- Check electrical cords and equipment daily.
- If you see someone working carelessly, report them immediately to your supervisor.
- Always obey warning signs. Know the safety instructions on every piece of equipment you operate. If you don't know, ask your supervisor.
- Report hazards to your supervisor. We are looking for your suggestions on improving safety.
- Remember --- Safety First On All Jobs.

### **ACCIDENT REPORTING PROCEDURE**

- Report all accidents to your supervisor immediately.
- If the accident requires medical attention, your supervisor will make the arrangements. All others should stay away from the scene.
- Keep calm, do not argue or make statements as to fault. Complete, with your supervisor, at the first opportunity an injury report, even if the accident seems minor.
- If in an auto accident while on the job, whether in a company or private vehicle, do not leave the scene. Give out only your name, employer and insurance information as carried in the vehicle. Do not admit fault or accuse other parties involved. Give data to the police. Get names, addresses, telephone numbers, license numbers and insurance information from other parties and witnesses.
- Your supervisor will make a report to management and/or the Safety Committee.
- The Safety Committee will review each accident report and try to determine procedures to help eliminate similar incidents from happening in the future.
- If your injury causes loss of work, contact your supervisor immediately. A doctor's written excuse is necessary for any loss of work or restrictions for your regular job. Your supervisor will discuss your progress and plans for return to work with management. You will be contacted regarding details of your return-to-work plan.

### **RETURN-TO-WORK PROGRAM**

- TPI Hospitality has a fully implemented return-to-work program for its injured associates.
- Management or a designee will be in contact with you and/or your medical provider regarding your condition and recovery.
- Based upon your doctor's advice, you will be given a job description. As your condition improves this job description could change until you are back to normal health and work.
- TPI Hospitality feels it has an obligation to our associates and will do everything reasonable to find a job description which fits your condition, with little or no time lost. This could involve alternate job descriptions, lighter duties, avoiding certain aspects of the job, such as lifting or part-time work while you are recovering.
- Management or a designee may be in contact with your medical provider and may ask you to see a different provider regarding your condition, treatment plan or return-to-work plan.

### **LIFTING AND MOVING MATERIAL**

- Always lift with your legs, not your back. Bend your knees, firmly grip the material and lift in a slow, continuous motion, straightening your legs. Thus, most of the weight is on your legs. Do not twist your body while lifting or carrying. Keep the object being carried against your body or thighs.
- If the material is heavy or cumbersome, always ask your supervisor to get additional help. You will save time in the long run by asking for help and taking your time when lifting.
- Use mechanical lifting or carrying devices as much as possible.

- If you have a back weakness or problem, whether temporary or permanent, inform your supervisor now. Arrangements will be made, whenever possible, to allow you to avoid lifting situations while you recover.

### **EQUIPMENT OPERATION, REPAIR, MAINTENANCE**

- Use common sense.
- Guards are placed at hazardous points on machines. They must be in place prior to operating. If this is not the case, contact your supervisor. Don't make alterations yourself. Contact your supervisor if you feel a guard needs changing or repair.
- You may make only those operating adjustments found in a machine's operating manual. You must shut off the safety switch, lock, block or unplug the machine, etc. prior to going into an unguarded area.
- When you leave a machine, shut it off. No machine should be left running unattended unless specifically designed for that purpose. If a machine should not be operated, be sure to tag it and lock the safety switch off. (see Lock Out / Tag Out procedures)

### **FRYER / GRILLS OPERATION & MAINTENANCE**

- Use proper brushes, hooks or tools to remove residue. Never use your hands.
- Before you operate, clean or work on a fryer or grill, you must first read and obey any warnings applied to them. If you don't, you could be burned, hurt or killed.
- Turn off the circuit breaker or fuse to the fryer or grill if it has faulty, loose or missing parts and leave OFF until repaired. If you don't, you could be electrocuted.
- Have the fryer or grill serviced only by trained professionals. These involve high temperatures and electricity which can injure or kill. Do not remove panels or attempt repairs for which you are not authorized.
- Do not put liquids or other objects near the fryer. If you do and they spill into the oil, it may boil out of the fryer, burning you and/or making the floor slippery.
- Do not sit, stand or lean on the fryer or grill.
- Do not splash water on the outside of the fryer or wash the outside with a hose. You could get water into the oil, causing it to boil over or you could get the electrical components wet, causing a short circuit.
- Do not turn power ON unless all heat coils are covered with fluid. Cooking oil could become hot enough to catch fire.
- Do not use fryer or grill if the oil is smoking excessively. Turn the power, circuit breaker or fuse off until the fryer or grill is repaired.
- Do not open the drain valve while cooking. Make sure the switch is OFF before attempting to drain the oil.
- Do not open the drain valve except to drain the cooking oil. Drain hot oil only into metal containers which you are positive will hold all of the contents. Let the oil cool before handling the containers.
- Always check to see if you can read any danger labels. Take the fryer or grill out of service until unreadable labels are replaced.
- You spill it, you clean it, immediately!!

### **HOUSEKEEPING AND CLOTHING**

- Use common sense.
- Associates working in a kitchen environment are required to wear non-slip shoes.
- Your work area must be kept clean and in order at all times. Always put things away in their proper place so that others can find them.
- Materials, equipment and supplies must be stored carefully. This will eliminate their falling on someone and reduce the chances of someone tripping over them.
- All chemicals, solutions and solvents must be kept in their proper containers and be properly

labeled.

- Flammable materials must be kept in metal safety containers with lids and must be properly labeled.
- Trash receptacles must be emptied on a regular basis.
- Water, oil, grease or other slippery substances, if spilled or on the floors for any reason, must be cleaned up immediately!!

### **KITCHEN KNIFE / SLICER HANDLING**

- Use common sense.
- All knives must be sharp at all times. Dull knives cause excess force to be used, which can cause accidents.
- All knives must be stored in knife racks, not in drawers.
- All cutting will be done at authorized food prep stations, away from heavy traffic.
- All cutting will be done on a chopping board, never in a person's hand.
- All chopping will be done with fingers of the hand holding the food item "curled under".
- Wear mesh gloves when using knives. Mesh gloves must also be worn when operating the slicer and when changing blades or otherwise servicing it.

### **INVENTORY, LOADING & UNLOADING**

- Use common sense.
- Make sure inventory is stored in a neat manner in the space or area provided.
- Make sure there is room between different types of inventory to allow easy, safe access to it.
- Prior to stacking inventory, make sure all shelves, racks or bins are in good repair. If not, contact your supervisor prior to stacking. Take time to do it right.
- Inventory must be stacked straight and squarely on the shelves, racks, carts or bins.
- There should be no debris in supply, inventory storage or receiving areas. These areas must be clean at all times during working hours, with no items in the walkways or aisles.
- Loading areas often are affected by rain, snow, ice, condensation or by mud and other substances being tracked in on feet, dollies and carts. If floors become wet or otherwise slippery, clean immediately or contact the person responsible for cleanup. Warn other associates of these possibly hazardous situations.

### **FIRST AID KITS**

- First aid kits are provided. It is the responsibility of every associate to know their location. Find the kit and take a look inside sometime before you need it.
- Each kit is fully stocked with health aides, including disposable gloves.
- It is the responsibility of supervisors to check the first aid kit periodically to maintain a supply of items.

### **RIGHT TO KNOW PROGRAM**

Some of the chemicals or other materials used could be dangerous and require that specific precautions be taken to protect our associates' health and environment. It is essential that any hazards associated with the handling of these materials during normal job operations be communicated to associates involved. Management, supervisors or trainers must obtain and distribute the proper information.

It will be the responsibility of the associates to be aware of these potential hazards, follow safe practices and procedures and to know where to find any special instructions and the emergency first aid procedures for eye contact, skin contact, inhalation or ingestion.

Always contact your supervisor immediately if you need assistance with first aid treatment. A physician will be contacted if further advice or information is needed.

TPI Hospitality has developed a Right to Know (RTK) program to establish procedures for working with and

handling hazardous substances. This program supports compliance with the Minnesota Occupational Safety and Health Administration (MNOSHA) Right To Know Standard. This program applies to all company associates who are routinely exposed to hazardous substances.

This RTK includes:

- Hazardous Substance Inventory
- Container Labeling
- Material Safety Data Sheets (SDS)
- Associate Training and Records of Training
- Eyewash Station
- Non-routine tasks
- Noise
- Strong Acids/Alkalines (Flammable and Combustible Liquids)
- Carbon Monoxide
- Compressed Gas Cylinders
- Resins & Sealants (PVC Adhesives)
- Paints
- Heat Stress
- Cold Stress
- Infectious Agents (Blood borne Pathogens)
- Summary

The following program outlines the steps that will help to accomplish these objectives.

#### HAZARDOUS SUBSTANCE INVENTORY

A list of all known hazardous substances will be kept in each of the SDS book(s) in each department. Your Supervisor is responsible for maintaining the list and will keep it updated. Ask your Supervisor where the SDS book(s) are located.

#### CONTAINER LABELING

Any container with a label provided by the manufacturer will be considered acceptable for use and properly labeled when the label contains the following information:

- The container is clearly labeled as to the contents.
- Appropriate hazard warnings are noted (i.e. flammable, eye irritant, etc.).
- The name and address or phone number of the manufacturer is listed.

The responsibility has been assigned to the Supervisor to ensure proper labeling of all containers.

To help ensure that associates are aware of the hazardous substances used in work areas or on jobsites, it is also our company policy to label all "secondary containers" such as generic spray bottles, squirt/squeeze bottles, etc. that contain more than a "day's use" quantity of a hazardous substance.

In order to make certain the container label information and SDS are used correctly transfer of any substance to a different or unlabeled container is prohibited.

In addition, if any container in the shop is found to have a missing or damaged label, a replacement/generic label needs to be provided for the container.

Again, the Supervisor will ensure that all containers are labeled with the original manufacturer's label or with a generic label.

#### SAFETY DATA SHEETS (SDS)



Copies of SDS for hazardous substances, harmful physical agents or infectious agents to which associates may be exposed are kept in SDS book(s). Please contact your Supervisor for the location of the SDS book(s). Your Supervisor will be responsible for obtaining and maintaining the data sheet system.

The SDS books will be organized by product.

The Safety Committee will review all new data sheets for significant health/safety information. The Safety Committee will also see that any new information is passed on to the affected associates.

If an SDS is missing or obviously incomplete, a new SDS will be requested from the manufacturer or supplier. If a SDS is not available please contact your Supervisor immediately.

As a “rule of thumb” SDS will be updated every January. Your Supervisor will contact the supplier or manufacturer of the product SDS, and request an updated SDS if it is older than 3 years. If an updated SDS is not available, the SDS will be dated at the top to indicate that the SDS is the most current to date.

### ASSOCIATE INFORMATION AND TRAINING

All training and protective equipment is provided at no cost to the associates.

*New Hire Training:* Associates will be shown at the beginning of their first scheduled shift where the SDS book(s) are kept, what hazardous substances, harmful physical agents or infectious agents they may be exposed to, how to work safely with the substances and procedures for reporting an exposure.

A SDS will be reviewed to ensure that the new hire associate knows where to find the safety information they might need or want. This will include:

- the name or names of the substance including any generic or chemical name, trade name and commonly used name;
- the level, if any and if known, at which exposure of the substance has been restricted according to standards adopted by the Commissioner or, if no standard has been adopted, according to guidelines established by competent professional groups which have conducted research to determine the hazardous properties of potentially hazardous substances;
- the known acute and chronic effects of exposure of hazardous levels, including routes of entry;
- the known systems of the effects;
- any potential for flammability, explosion or reactivity of the substance;
- appropriate emergency treatment;
- the known proper conditions for use of and exposure to the substance;
- procedures for clean up of leaks and spills;
- the name, telephone number and address of a manufacturer of the hazardous substance;
- and
- a written copy of all the above information which shall be readily accessible in the area or areas in which the hazardous substance is used or handled.

*Annual Training:* Associates will also be expected to attend a Health and Safety Training in January set up by the Safety Committee that will include the following:

- An overview of the requirements contained in the Right To Know regulations including their rights under the MNOSHA regulations.
- Location and availability of the SDS book(s).
- How to lessen or prevent exposure to these hazardous substances through usage of engineering controls, work practices, and personal protective equipment.
- How to read labels and review SDS to obtain appropriate hazard information.
- The location and proper use of the eyewash station.
- Sex Trafficking training is mandatory for all TPI associates at all hotel locations.

Affected associates will be informed when new hazardous substances are introduced. Your Safety Committee will review the above items as they relate to the new material in your work area.

*Records of RTK Training:* Records of Training will be maintained on property by the General Manager for a minimum of three (3) years.

### EYEWASH STATION

- Eyewash stations shall be located in each housekeeping department and pool room. This station shall be well lit and clearly indicated by signs and directional markings.
- The paths to these stations will be on the same level as the potential hazard and will be kept clear.
- These stations shall be operable at all times. If shut off valves are installed on plumbed systems provisions shall be made to prevent unauthorized shut off.
- Floor drains near eyewash stations are desirable but not essential.
- The eyewash should be capable of delivering directly to the eyes a pressure-reduced divergent flow of flushing fluid (minimum flow of 0.4 gallons per minute of flushing fluid for at least 15 minutes) and should be designed and installed so that both hands can be free to assist in irrigation. A quick opening valve which remains open when released is also necessary.
- The flushing fluid should be tepid (between 60 and 90 degrees Fahrenheit) and must never exceed 100 degrees F.
- Eyewash stations should be tested weekly. This testing should include testing for adequate flow of water, unobstructed eyewash head passages and assurance that the water controls operate so that the flow of water is even without spurts and other signs of periodic over pressurization. Eyewashes should be flushed at least 3 minutes weekly to reduce *Acanthamoeba* bacteria.
- Squeeze bottles of sterile water or eyewash solution should only be used in conjunction with a properly located eyewash.

### NON-ROUTINE TASKS INVOLVING HAZARDOUS SUBSTANCES

Periodically, associates are required to perform non-routine tasks that require the use of hazardous substances. Prior to starting work on such tasks, each affected associate will be given information by their Supervisor about hazards to which they may be exposed during such an activity.

This information will include:

- Specific hazards.
- Protective/safety measures and personal protective equipment that must be utilized.

### NOISE

TPI Hospitality is not aware of having exceeded OSHA's 85 dba TWA action level (average daily dose allowed). Hearing protectors are readily accessible for any associate performing tasks where noise is produced.

### STRONG ACIDS & ALKALIS

Acids are chemically active materials. They are not flammable, but they can react with other chemicals, as in the case of a leak or spill, and cause a fire, explosion, or the generation of a toxic gas. Strong alkalis are found in caustic cleaning agents. Both acids and alkalis may be found in solid and liquid forms.

*Health Effects:*

- Both categories of chemicals are skin and eye irritants. Depending on the concentration, reactions can range from irritation to severe burns. Blindness can result from eye contact.
- The vapors or mist from an acid are extremely irritating to the respiratory tract.
- Inhalation of mist or dust of a strong alkali may cause irritation, dizziness, and/or injury
  - to the respiratory tract.

*Precautions / Controls:*

- Rubber or plastic gloves are required when using a concentrated solution.
- Apron or other appropriate garments should be used depending on the extent of exposure.
- Wear goggles or face shield during pouring or mixing, or if there is a chance of splashing.
- Use only in a well-ventilated area and avoid inhaling vapors or dusts.

REMEMBER: When acid and water must be mixed, acid must be poured slowly into the water.

CARBON MONOXIDE

Carbon Monoxide is a colorless, odorless, and tasteless gas that will cause headache, nausea, dizziness, etc. if an overexposure condition exists. TPI Hospitality associates will monitor environmental exposure of associates to carbon monoxide when internal combustion engines discharge engine exhaust gases indoors or unvented space heaters are operated indoors to ensure that carbon monoxide levels do not exceed those given in Code of Federal Regulations, title 29, section 1926.55, Appendix A.

COMPRESSED GAS CYLINDERS

Typical hazards, which could result from abuse or mishandling of compressed gas cylinders, include leaks and explosions.

The following safe handling practices will assist in reducing or eliminating potential hazards:

- Each cylinder must be clearly labeled with the contents and appropriate hazard warnings.
- Container valves should be kept closed at all times whether charged or empty except
  - when the container is in use.
- Do not roll, drag or slide containers. Use a hand truck or other suitable device.
- Do not lift containers by container caps.
- All containers in service or in storage should be stored in its' designated area standing upright.

*Leak Response Information:*

CONTAINER LEAKS:

\*\*Remove leaking container outdoors or to well-ventilated area.

\*\*Tag the leaking container with appropriate warning and notify the gas supplier.

VALVE LEAKS:

Close container valve and tighten the valve gland or packing nut as appropriate. If the leak continues when the valve is opened, re-close the valve and tag the container as unusable.

RESINS & SEALANTS (PVC Adhesives)

Resins are used as adhesives and as coatings. Some paints have an epoxy resin base. Some resins may also be used in fabricated products (plastics).

Unique properties of Epoxy Resins:

Resistant to other chemicals and weathering  
Do not conduct electricity  
Harden at room temperature

*Potential Health Problems Associated With Epoxy Resins:*

- Dermatitis. Symptoms include dryness and reddening of skin with a skin rash at the point of contact. This type of reaction can occur from repeated or prolonged contact with the resin, curing agent or solvent. There have been no reports of dermatitis associated with contact with cured resins.
- Sensitization. Dermatitis and/or itching sensation at the point of contact on the skin. This is an allergic reaction that usually develops over a period of time as a result of repeated and/or

prolonged skin contact with the resin or curing agent. Once you are sensitized to this material, any contact will cause an allergic reaction.

- Problems associated with solvent vapor inhalation. As described in the solvents section, possible symptoms are dizziness, headache, nausea, and loss of coordination. Respiratory irritation is not uncommon with prolonged exposure.

#### *Potential Health Effects Associated With Other Resin Systems:*

- Skin problems: Either most resins and sealants, including polyurethane and cyanoacrylate systems, irritation and dermatitis may occur.
- Eye irritation. Many resin systems cause tearing and may cause blurred vision with concentrations of vapor in the air.
- Polyurethane Systems. Part A is also a respiratory irritant. Respiratory sensitization may also occur after chronic exposure to low levels in sensitive individuals.
- Cyanoacrylates will rapidly bond skin together.

#### *Precautions / Control Measures:*

- Personal hygiene. Always remove any material that has spilled on skin or clothing. Wash thoroughly before eating and at the end of the day. Do not wash up using solvents.
- Avoid prolonged inhalation of fumes and vapors. Use a respirator if necessary.
- Avoid smoking, vaping, or eating in areas where epoxies are being used.
- Mix epoxy resin systems in a well-ventilated area.
- See the section on solvents for more information.

### PAINTS

#### *Hazards:*

- Dermatitis may occur from either excessive skin contact with solvents or occasionally from the paint itself.
- Solvent vapor inhalation. General symptoms include dizziness, headache, nausea, and eye and nose irritation. See solvents section for more information.
- Inhalation of paint pigment. Some paints contain toxic heavy metals such as lead and zinc chromates. Long term health effects from overexposure may include lung damage from chromate compounds, and possibly damage to blood-forming, nervous and reproductive systems from lead.

#### *Precautions / Control Measures:*

- Wear protective clothing as required or as needed to prevent prolonged skin contact.
- Wear a respirator as needed, making sure that the appropriate cartridges are used.
- DO NOT REMOVE PAINT FROM SKIN USING GASOLINE or other strong solvents! Use an appropriate hand cleaner.
- Good personal hygiene is very important.
- Use all available venting and filtering systems.

### HEAT STRESS

Many workers spend some part of their working day in a hot environment. Workers sometimes face hot conditions which pose special hazards to safety and health.

*Heat Stress Causes Body Reactions:* Four environmental factors affect the amount of stress a worker faces in a hot work area: temperature, humidity, radiant heat (such as from the sun or a furnace) and air velocity. Perhaps most important to the level of stress an individual faces are personal characteristics such as age, weight, fitness, medical condition and acclimatization to the heat.

The body reacts to high external temperature by circulating blood to the skin that increases skin

temperature and allows the body to give off its excess heat through the skin. If the muscles are being used for physical labor, less blood is available to flow to the skin and release the heat.

Sweating is another means the body uses to maintain a stable internal body temperature in the face of heat. However, sweating is effective only if the humidity level is low enough to permit evaporation and if the fluids and salts lost are adequately replaced.

Of course there are many steps a person might choose to take to reduce the risk of heat stress, such as moving to a cooler place, reducing the work pace or load, or removing or loosening some clothing.

If the body cannot dispose of excess heat, it will store it. When this happens, the body's core temperature rises and the heart rate increases. As the body continues to store heat, the individual begins to lose concentration and has difficulty focusing on a task, may become irritable or sick and often loses the desire to drink. The next stage is most often fainting and death is possible if the person is not removed from the heat stress.

*Heat Disorders:* **Heat exhaustion** results from loss of fluid through sweating when a worker has failed to drink enough fluids or take in enough salt or both. The worker with heat exhaustion still sweats but experiences extreme weakness or fatigue, giddiness, nausea, or headache. The skin is clammy and moist, the complexion pale or flushed, and the body temperature normal or slightly higher. Treatment is usually simple: the victim should rest in a cool place and drink an electrolyte solution (a beverage used by athletes to quickly restore potassium, calcium, and magnesium salts). Severe cases involving victims who vomit or lose consciousness may require longer treatment under medical supervision.

**Heat stroke**, the most serious health problem for workers in hot environments, is caused by the failure of the body's internal mechanism to regulate its core temperature. Sweating stops and the body can no longer rid itself of excess heat. Signs include (1) mental confusion, delirium, loss of consciousness, convulsions or coma; (2) a body temperature of 106 degrees F or higher; and (3) hot dry skin which may be red, mottled, or bluish. Victims of heat stroke will die unless treated promptly. While awaiting medical help, the victim must be removed to a cool area and his or her clothing soaked with cool water. He or she should be fanned vigorously to increase cooling. Prompt first aid can prevent permanent injury to the brain and other vital organs.

**Heat cramps**, painful spasms of the muscles, are caused when workers drink large quantities of water but fail to replace their bodies' salt loss. Tired muscles -- those used for performing the work -- are usually the ones most susceptible to cramps. Cramps may occur during or after working hours and may be relieved by taking liquids by mouth or saline solutions intravenously for quicker relief, if medically determined to be required.

**Fainting** (heat syncope) may be a problem for the worker unacclimatized to a hot environment who simply stands still in the heat. Victims usually recover quickly after a brief period of lying down. Moving around, rather than standing still, will usually reduce the possibility of fainting.

**Heat rash**, also known as prickly heat, may occur in hot and humid environments where sweat is not easily removed from the surface of the skin by evaporation. When extensive or complicated by infection, heat rash can be so uncomfortable that it inhibits sleep and impedes a worker's performance or even results in temporary total disability. Resting in a cool place and allowing the skin to dry can prevent it.

#### *Preventing Heat Stress:*

Most heat-related health problems can be prevented or the risk of developing them reduced. Following a few basic precautions should lessen heat stress.

- A variety of **engineering controls** including general ventilation and spot cooling by local exhaust ventilation at points of high heat production may be helpful. Shielding is required as protection from radiant heat sources. Evaporative cooling and mechanical refrigeration are other ways to reduce heat. Cooling fans can also reduce heat in hot conditions. Eliminating steam leaks will also help. Equipment modifications, the use of power tools to reduce manual labor and personal cooling devices or protective clothing are other ways to reduce the hazards of heat exposure for workers.
- **Work practices** such as providing plenty of drinking water -- as much as a quart per worker per hour -- at the workplace can help reduce the risk of heat disorders. Training first aid workers to recognize and treat heat stress disorders and making the names of trained staff known to all workers is essential. Employers should also consider an individual worker's physical condition when determining his or her fitness for working in hot environments. Older workers, obese workers and personnel on some types of medication are at greater risk.
- Alternating **work and rest** periods with longer rest periods in a cool area can help workers avoid heat stress. If possible, heavy work should be scheduled during the cooler parts of the day and appropriate protective clothing provided. Supervisors should be trained to detect early signs of heat stress and should permit workers to interrupt their work if they are extremely uncomfortable.
- **Acclimatization** to the heat through short exposures followed by longer periods of work in the hot environment can reduce heat stress.
- **Associate education** is vital so that workers are aware of the need to replace fluids and salt lost through sweat and can recognize dehydration, exhaustion, fainting, heat cramps, salt deficiency, heat exhaustion, and heat stroke as heat disorders.

### COLD STRESS

As the weather becomes "frightful" during winter months, workers who must brave outdoor conditions face the occupational hazard of exposure to the cold. Prolonged exposure to freezing temperatures can result in health problems as serious as trench foot, frostbite, and hypothermia. Workers need to be especially mindful of the weather, its effects on the body, proper prevention techniques, and treatment of cold-related disorders.

*The Cold Environment:* An individual gains body heat from food and muscular activity and loses it through convection, conduction, radiation and sweating to maintain a constant body temperature. When body temperature drops even a few degrees below its normal temperature of 98.6°F (37°C), the blood vessels constrict, decreasing peripheral blood flow to reduce heat loss from the surface of the skin. Shivering generates heat by increasing the body's metabolic rate. The four environmental conditions that cause cold-related stress are low temperatures, high/cool winds, dampness and cold water. Wind chill, a combination of temperature and velocity, is a crucial factor to evaluate when working outside. For example, when the actual air temperature of the wind is 40°F (4°C) and its velocity is 35 mph, the exposed skin receives conditions equivalent to the still-air temperature being 11°F (-11°C)! A dangerous situation of rapid heat loss may arise for any individual exposed to high winds and cold temperatures.

### **Major Risk Factors for Cold-Related Stresses**

- Wearing inadequate or wet clothing increases the effects of cold on the body.
- Taking certain drugs or medications such as alcohol, nicotine, caffeine, and medication that inhibits the body's response to the cold or impairs judgment.
- Having a cold or certain diseases, such as diabetes, heart, vascular, and thyroid problems, may make a person more susceptible to the winter elements.
- Being a male increases a person's risk to cold-related stresses. Sad, but true, men experience far greater death rates due to cold exposure than women, perhaps due to inherent risk-taking activities, body-fat composition or other physiological differences.
- Becoming exhausted or immobilized, especially due to injury or entrapment, may speed up the effects of cold weather.
- Aging -- the elderly are more vulnerable to the effects of harsh winter weather.

*Harmful Effects of Cold:*

**Frostbite** occurs when the skin tissue actually freezes, causing ice crystals to form between cells and draw water from them, which leads to cellular dehydration. Although this typically occurs at temperatures below 30°F (-1°C), wind chill effects can cause frostbite at above-freezing temperatures.

*Symptoms:*

Initial effects of frostbite include uncomfortable sensations of coldness; tingling, stinging or aching feeling of the exposed area followed by numbness. Ears, fingers, toes, cheeks, and noses are primarily affected. Frostbitten areas appear white and cold to the touch. The appearance of frostbite varies depending on whether rewarming has occurred. Deeper frostbite involves freezing of deeper tissues (muscles, tendons, etc.) causing exposed areas to become numb, painless, and hard to the touch.

Treatment:

If you suspect frostbite, seek medical assistance immediately. Any existing hypothermia should be treated first (See Hypothermia below). Frostbitten parts should be covered with dry, sterile gauze or soft, clean cloth bandages. Do not massage frostbitten tissue because this sometimes causes greater injury. Severe cases may require hospitalization and even amputation of affected tissue. Take measures to prevent further cold injury. If formal medical treatment will be delayed, consult with a health care professional for training on re-warming techniques.

**General Hypothermia** occurs when body temperature falls to a level where normal muscular and cerebral functions are impaired. While hypothermia is generally associated with freezing temperatures, it may occur in any climate where a person's body temperature falls below normal. For instance, hypothermia is common among the elderly who live in cold houses.

*Symptoms:*

The first symptoms of hypothermia, shivering, an inability to do complex motor functions, lethargy, and mild confusion, occur as the core body temperature decreases to around 95°F (35°C). As body temperature continues to fall, hypothermia becomes more severe. The individual falls into a state of dazed consciousness, failing to complete even simple motor functions. The victim's speech becomes slurred and his or her behavior may become irrational. The most severe state of hypothermia occurs when body temperature falls below 90°F (32°C). As a result, the body moves into a state of hibernation, slowing the heart rate, blood flow, and breathing. Unconsciousness and heart failure can occur in severe cases.

Treatment:

Treatment of hypothermia involves conserving the victim's remaining body heat and providing additional heat sources. Specific measures will vary depending upon the severity and setting (field or hospital). Handle hypothermic people very carefully because of the increased irritability of the cold heart. Seek medical assistance for persons suspected of being moderately or severely hypothermic.

If the person is unresponsive and not shivering, assume he or she is suffering from severe hypothermia. Reduction of heat loss can be accomplished by various means: obtaining shelter, removal of wet clothing, adding layers of dry clothing, blankets, or using a pre-warmed sleeping bag.

For mildly hypothermic cases or those more severe cases where medical treatment will be significantly delayed, external re-warming techniques may be applied. This includes body-to-body contact (e.g., placing the person in a pre-warmed sleeping bag with a person of normal body temperature), chemical heat packs, or insulated hot water bottles. Good areas to place these packs are the armpits, neck, chest, and groin. It is best to have the person lying down when applying external re-warming. You also

may give mildly hypothermic people warm fluids orally, but avoid beverages containing alcohol or caffeine.

#### *Preventing Cold-Related Disorders:*

**Personal Protective Clothing:** perhaps the most important step in fighting the elements is providing adequate layers of insulation from them. Wear at least three layers of clothing:

- An outer layer to break the wind and allow some ventilation (like Gore-Tex® or nylon);
- A middle layer of wool or synthetic fabric (Qualofil or Pile) to absorb sweat and retain insulation in a damp environment. Down is a useful lightweight insulator; however, it is ineffective once it becomes wet.
- An inner layer of cotton or synthetic weave to allow ventilation.

Pay special attention to protecting feet, hands, face and head. Up to 40 percent of body heat can be lost when the head is exposed. Footgear should be insulated to protect against cold and dampness. Keep a change of clothing available in case work garments become wet.

**Engineering Controls:** in the workplace through a variety of practices help reduce the risk of cold-related injuries.

- Use an on-site source of heat, such as air jets, radiant heaters, or contact warm plates.
- Shield work areas from drafty or windy conditions.
- Provide a heated shelter for associates who experience prolonged exposure to equivalent wind-chill temperatures of 20°F (-6°C) or less.
- Use thermal insulating material on equipment handles when temperatures drop below 30°F (-1°C).

**Safe Work Practices:** such as changes in work schedules and practices, are necessary to combat the effects of exceedingly cold weather.

- Allow a period of adjustment to the cold before embarking on a full work schedule.
- Always permit associates to set their own pace and take extra work breaks when needed.
- Reduce, as much as possible, the number of activities performed outdoors. When associates must brave the cold, select the warmest hours of the day and minimize activities that reduce circulation.
- Ensure that associates remain hydrated.
- Establish a buddy system for working outdoors.
- Educate associates to the symptoms of cold-related stresses -- heavy shivering, uncomfortable coldness, severe fatigue, drowsiness, or euphoria.

The quiet symptoms of potentially deadly cold-related ailments often go undetected until the victim's health is endangered. Knowing the facts on cold exposure and following a few simple guidelines can ensure that this season is a safe and healthy one.

#### INFECTIOUS AGENTS

Refer to the Bloodborne Pathogen Section for more information.

Associates might encounter fungus, parasites, and/or bacterial growth inside of signs being serviced where stagnant water is present. These potentially infectious agents should be avoided through proper work practices (hand washing, clean ups, etc.) to prevent exposure. If there are any questions about conditions involving stagnant water in signs, please contact the Maintenance Engineer for assistance.

#### SUMMARY of RIGHT TO KNOW PROGRAM

TPI Hospitality recognizes the need for a written Right To Know Program. If anyone has questions or suggestions about this plan contact the Safety Committee or your General Manager or your Regional Vice



President. The plan will be reviewed each January by TPI Hospitality Senior Management to help ensure that the policies are carried out and that the plan is effective.

### **BLOODBORNE PATHOGENS**

The purpose of this Written Exposure Control Plan (ECP) is to establish a program and procedures to reduce or eliminate occupational exposure to blood or certain other potentially infectious materials (OPIM) to its associates. This plan supports compliance with Occupational Safety and Health Administration (OSHA) 29 CFR 1910.1030 Bloodborne Pathogens. This ECP applies to all associates.

Pathogens are disease-causing microorganisms. Bloodborne pathogens are viruses or bacteria present in human blood and body fluids that can infect and cause disease in human. The two most notable of these are Human Immunodeficiency Virus (HIV) and Hepatitis B Virus (HBV). Bloodborne pathogens are not transmitted by casual contact, such as touching or sharing equipment or facilities. The most common ways that people become infected by Bloodborne pathogens is through sexual transmission or IV drug use. However, any contact with infected blood or body fluids carries the risk of potential infection.

### WRITTEN EXPOSURE CONTROL PLAN (ECP)

This ECP will be reviewed by Management at least annually each January and whenever necessary to include new or modified tasks and procedures.

Universal (widespread) precautions will be observed at this property to prevent contact with blood or other potentially infectious materials. This means all blood or other potentially infectious material will be considered infectious regardless of the perceived status of the source individual. Other potentially infectious materials include any body fluids visibly contaminated with blood and all body fluids in situations where it is difficult to differentiate between body fluids.

This ECP includes:

- determination of associate exposure
- implementation of various methods of exposure control including:
  - universal precautions
  - engineering and work practice controls
  - personal protective equipment
  - housekeeping
  - laundry
  - labels
- hepatitis b vaccination
- post exposure evaluation and follow up
- communication of hazards to associates and training
- recordkeeping
  - training records
  - medical records
  - OSHA recordkeeping
  - sharps injury log
- procedures for evaluating circumstances surrounding an exposure incident

All associates will be required to attend Bloodborne pathogen training session within the first 90 days of employment and the annual refresher training in January.

A copy of OSHA's Bloodborne pathogens standard and MNOSHA rules are available for review at Corporate Administrations Office.

### SCOPE AND APPLICATION

This standard regulating Bloodborne pathogens applies to all occupational exposure to blood and other

potentially infectious materials. It covers all associates who, as a result of performing their job duties, could reasonably anticipate contact with blood or other potentially infectious materials. Associates who meet these guidelines are listed in the following Determination of Exposure section.

Good Samaritan acts, such as assisting a coworker or guest with a nose bleed, would not be considered occupational exposure.

#### DETERMINATION OF EXPOSURE:

We have identified daily routine tasks or procedures that would cause these job classifications to have potential occupational exposure and the work control practices which should be followed to reduce the likelihood of exposure. Personal Protective Equipment will be made available to all associates in the housekeeping and maintenance departments.

#### **Emergency Response Team Members:**

These associates have been designated to handle clean up and removal of any exposure incidents. These Emergency Response Team (ERT) Members would include the Hotel General Manager, the Hotel Assistant General Manager, the Manager on Duty (MOD), the Executive Housekeeper, the Assistant Executive Housekeeper, the Maintenance Engineer, the Janitor and the Laundry Attendants, Waterpark Managers and Lifeguards.

**Any associate, including Room and Waterpark / Pool Attendants, who think they may have a potential exposure situation, including blood soiled linens, needles or any other infectious materials, should immediately contact these designated personnel (ERT) to properly handle the item(s).**

#### METHODS OF IMPLEMENTATION AND CONTROL:

*Universal Precautions:* Treat all blood and body fluid spills as if they are infectious. Handle all trash as if it contained sharps and/or infectious items. Don't eat or smoke in your work area. Germs get on your hands, food, and smoking materials and go directly into your mouth. Contain spills immediately, then clean up and disinfect the area.

*Engineering Controls and Work Practices:* The Safety Committee will be responsible for inspecting and maintaining and replacing when necessary sharps disposal containers.

*Personal Protective Equipment (PPE):* PPE is provided to our associates at no cost to them. Training is provided by your Supervisor in the use of appropriate PPE for the tasks or procedures associates will perform. The types of PPE available to associates are as follows: hypoallergenic gloves, glove liners, powderless gloves or other similar alternatives. Consult your Supervisor to find where PPE is located in your department.

All associates using PPE must observe the following precautions: wash hands immediately or as soon as feasible after removal of gloves or other PPE. Remove PPE after it becomes contaminated and before leaving the work area. Used PPE should be disposed of in appropriately marked and labeled bags. Wear appropriate gloves when it can be reasonably anticipated that there may be hand contact with blood or OPIM and when handling or touching contaminated items or surfaces. Replace gloves when torn, punctured, contaminated or if their ability to function as a barrier is compromised. Never wash or decontaminate disposal gloves for reuse. Wear appropriate face and eye protection when splashes, sprays, spatters or droplets of blood or OPIM pose a hazard to the eye, nose or mouth. Remove immediately or soon as feasible any garment contaminated by blood or OPIM in such a way as to avoid contact with the outer surface.

*Housekeeping:* Regulated waste is placed in containers which are closable, puncture resistant, constructed to contain all contents and prevent leakage, appropriately labeled or color coded and closed prior to removal to prevent spillage or protrusion of contents when handling. Consult your Supervisor to find where Sharps disposal containers are located in your department. Broken glassware which may be contaminated is picked up using mechanical means such as brush and dust pan, tongs or

forceps. Never use your hands even if protected with gloves.

*Laundry:* The following contaminated items will be laundered on property: bed linens and towels. Laundry will be performed daily by the Laundry Attendant (a ERT member). The following laundering requirements must be met: handle contaminated laundry as little as possible with minimal agitation. Place wet contaminated laundry in leak proof, labeled or color coded containers before transport. Always wear gloves when handling or sorting contaminated laundry.

*Labels:* Your Supervisor will ensure warning labels are affixed or red bags are used as required if regulated waste or contaminated equipment are on property. Associates are to notify your Supervisor if they discover regulated waste containers, contaminated equipment, etc. without proper labels. See labeling requirements at back of this section.

### HEPATITIS B VACCINATION

The Hepatitis B Virus (HBV) causes Hepatitis B infection. The incubation period of Hepatitis B ranges from 45 to 160 days. The onset of acute disease occurs gradually and is discovered in the patient only after the illness has become fully involved at which time symptoms of anorexia, malaise, nausea, vomiting, abdominal pain, jaundice and skin rashes surface.

The Supervisor will train associates on Hepatitis B vaccination; addressing the safety benefits, efficiency, methods of administration and availability. The hepatitis B vaccination series will be offered within 10 days of initial assignment to those ERT associates deemed to have occupational exposure and associates designated to handle clean up and removal of any exposure incidents. The vaccination series will be offered at no cost to the ERT associate during regular working hours when possible. A local health care provider as determined by TPI's Human Resources Department will perform all hepatitis B vaccinations. For those associates identified above in the Determination of Exposure section of this plan who choose to receive it, the vaccine will be administered in a series of three shots over six months by a health care provider appointed by the property and administered according to current recommendations of the US Public Health Service. All three shots must be administered to be effective. Those associates who have a known allergy to yeast (if they are allergic to bread, they are allergic to yeast) should inform the health care provider administering the vaccine as they may develop a severe reaction to it.

Upon hire all associates will receive training on their job exposure risk. Members of ERT and Room Attendants will be asked to sign the Bloodborne Pathogens Hepatitis B Vaccination Form found at the back of this Safety Manual. Any ERT associate who initially declines the vaccine and continues to have the potential for exposure will have the option to request it at a later date at no cost to them. Non-ERT associates agree to inform their Supervisor, Department Manager, Manager on Duty or General Manager if they come in potential contact with blood or OPIM.

### POST EXPOSURE EVALUATION AND FOLLOW UP

An exposure incident is defined as a specific eye, mouth, nose or skin contact with potentially infectious materials. TPI Hospitality will treat all reports in the strictest confidence. Steps to take include:

- Flush the area on your body that was exposed with warm water. Then wash with soap and water. Vigorously scrub all areas. It is the abrasive action of the scrubbing that removes contaminants from the skin. If you have an open wound, squeeze gently to make it bleed, then wash with soap and water. Go to the emergency room for treatment and testing after an incident if needed.
- Contact your immediate supervisor or on-property Human Resources associate to complete post exposure paperwork.
- Associate should go to emergency room for treatment.
- A physician will counsel the associate on the risk of HIV or HBV infection and any other follow up treatment needed.

### ASSOCIATE TRAINING

All housekeeping associates will receive proper Bloodborne pathogens training. The following will be discussed:

- a copy and explanation of the standard
- an explanation of our ECP
- an explanation of methods to recognize tasks and other activities that may involve exposure to blood and OPIM, including what constitutes an exposure incident
- an explanation of the use and limits of engineering controls, work practices and PPE
- an explanation of the types, uses, location, removal, handling, decontamination + disposal of PPE
- an explanation of the basis for PPE selection
- information on the hepatitis B vaccine, including information on its efficiency, safety, method of administration, the benefits of being vaccinated and that the vaccine will be offered free of charge to ERT members
- information on the appropriate actions to take and persons to contact in an emergency involving blood or OPIM
- an explanation of the procedure to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available
- information on the post-exposure evaluation and follow-up that the employer is required to provide for the associate following an exposure incident
- an explanation of the signs and labels and/or color coding required by the standard and used at this location
- an opportunity for interactive questions and answers with the person conducting the training session

#### RECORDKEEPING

*Training Records:* Training records are completed for each associate upon completion of training. Associate training records are provided upon request to the associate within 15 working days. Such requests should be forwarded to your immediate supervisor or on-property Human Resources associate.

*Medical Records:* Medical records are maintained for each associate with occupational exposure in accordance with 29 CFR 19110.1020, Access to Employee Exposure and Medical Records. These medical records of exposure incidents and hepatitis vaccination records will be kept on file at Corporate Administrations Office for at least the duration of employment plus thirty (30) years. Associate medical records are provided upon request to the associate within 15 working days. Such requests should be forwarded to Corporate Administrations Office.

*OSHA Recordkeeping:* An exposure incident is recordable on the OSHA 300 Log if the case meets OSHA's Recordkeeping Requirements (29 CFR Part 1904). This determination and the recording activities are done by and at the Corporate Administrations Office.

*Sharps Injury Log:* In addition to the 1904 Recordkeeping Requirements, all percutaneous injuries from contaminated sharps are recorded in the sharps injury log. This log is reviewed at least annually in January as part of the annual evaluation of the program and is maintained for at least five (5) years following the end of the calendar year that they cover. This log is maintained and kept at the Corporate Administrations Office. A copy may be requested by anyone, but any personal identifiers will be removed from the report.

#### ADMINISTRATION OF POST-EXPOSURE EVALUATION AND FOLLOW UP

Corporate Administrations Office will ensure that the health care professional responsible for the associate's Hepatitis B vaccination and post-exposure evaluation and follow-up are given all necessary forms and paperwork. Corporate Administrations Office will provide the associate with a copy of the evaluating health care professional's written opinion within 15 days after completion of the evaluation.

#### **LOCK OUT / TAG OUT**

- All equipment is to be locked and tagged out to protect against accidental or inadvertent operation of equipment.
- Do not attempt to operate any switch, valve or other energy isolating device if it is locked and tagged out.
- A lockout device and warning tag must be used if the energy isolating device is capable of being locked out.
- If an energy isolating device is not capable of being locked out, then only the warning tag must be attached to the device. Tags must be legible.
- Warning tags must be signed and dated by the authorized associate and should be afforded the same notice and respect as a lock.
- Energy isolating devices for machines or equipment must be designed to accept a lockout device when major replacement, repair, renovation or modification is performed and/or new machines or equipment are installed.
- Each machine or piece of equipment must have a specific written lockout and/or tag out procedure.

#### Guidelines for Shutdown of Equipment:

- Before shutdown, an authorized associate must know the type and magnitude of the energy, hazards of the energy to be controlled and the method or means to control the energy. A machine specific Lock Out / Tag Out Procedure should be developed, posted and followed by an authorized associate for each machine.
- The authorized associate must:
- Notify all affected associates in the area of the lockout and/or tag out.
- Shutdown the machine or equipment by the normal stopping procedure.
- Ensure main power switches, circuits or other sources of energy are moved to the OFF position.
- Place locks or tags on the switches or other sources of energy, in the SAFE or OFF position. When locks are used, warning tags must be placed with each lock. If a lock cannot be used, a suitable tag should be provided and should be afforded the same notice and respect as a lock.
- Relieve, disconnect or otherwise make safe all potentially hazardous stored or residual energy (springs, water, pressure, electrical, hydraulic, pneumatic) by repositioning, blocking or bleeding down.
- After completing the above steps, and ensuring that no personnel are exposed, the authorized associate should attempt to start the equipment to ensure that it is completely disabled.

#### Guidelines for Restoring Equipment:

- The authorized associate who performed the Lock Out / Tag Out procedure should:
- Check around the machine or equipment and the immediate area to ensure that nonessential items (tools, parts, etc.) have been removed and all guards have been replaced.
- Notify all affected associates that the machinery is going to be restored.
- Check the work area to ensure that the associates have been safely positioned or removed from the exposed area.
- Verify the controls are in neutral.
- Remove the lock out / tag out devices and re-energize the machine or equipment.

#### Procedure Involving More Than One Person

In the preceding steps, if more than one individual is required to lockout or tag out equipment, each shall place his/her own personal lockout or tag out device on the energy isolating device(s). When an energy isolating device cannot accept multiple locks or tags, a multiple lockout or tag out device (hasp) may be used. If lockout is used, a single lock may be used to lockout the machine or equipment with the key being placed in a lockout box or cabinet which allows the use of multiple locks to secure it. Each associate will then use his/her own lock to secure the cabinet. As each person no longer needs to maintain his/her lockout protection, that person will remove his/her lock from the box or cabinet.

### **SHARPS AND BIOHAZARD WASTE DISPOSAL PROCEDURES**

Contaminated sharps and biohazard waste shall be discarded immediately or as soon as feasible in containers that are closeable, puncture resistant, leak proof on sides and bottom and labeled or color coded.

Broken glassware should be picked up using mechanical means such as brush and dust pan, tongs or forceps. Never use your hands even if protected with gloves.

The containers should be easily accessible to all associates and located as close as feasible to the immediate area where sharps are used or can be reasonable anticipated to be found (Housekeeping Department, Maintenance Department, Kitchen/Banquet areas).. Consult your Supervisor to find where Sharps disposal containers are located in your department.

When moving containers of contaminated sharps or biohazard waste items from the area of use, the containers shall be closed immediately prior to removal or replacement to prevent spillage or protrusion of contents during handling, storage or disposal.

The container shall be placed in a secondary container if leakage of the primary container is possible.

Small amounts of blood and/or body fluid contaminated waste, such as bandages, rubber gloves, band-aids, etc., may be disposed of in the normal refuse containers, if, and only if, the waste has been chemically decontaminated with an approved disinfectant or a solution of 1 part bleach to 10 parts water.

Because each state and city has their own regulations for hazardous waste disposal, the Safety Committee should contact the following departments for their regulations: Federal (U.S. Public Health Service); State (Department of Natural Resources); and Local (City Health Department). The Emergency Response Team (ERT) will be responsible for disseminating and disposal of blood and body fluid spills.

## **RESPIRATORY PROTECTION POLICY**

### **PURPOSE**

TPI Hospitality has determined that associates involved in dispensing muriatic/hydrochloric acid solutions in the pool room area during routine operations must wear a respirator as described below.

Engineering controls, such as ventilation are the first line of defense at TPI Hospitality; however, engineering controls are not always feasible at preventing associate exposure. In these situations, respirators and other protective equipment must be used.

This Respiratory Plan includes:

- Responsibilities
  - Safety Committee
  - Associates
- Program Elements
- Medical Questionnaire
- Fit Testing General Use Procedures
- Cleaning, Maintenance, Changing and Storage
- Associate Training
- Program Evaluation
- Documentation and Recordkeeping

### **SCOPE AND APPLICATION**

This program applies to all associates who are required to wear respirators during normal work operations. All associates using respirators must be enrolled in the company's respiratory protection program. The

associates subject to this respiratory program are all maintenance personnel.

Associates participating in the respiratory protection program do so at no cost to them. The expense associated with training, medical evaluations and respiratory protection equipment will be borne by the Company.

### RESPONSIBILITIES

*Safety Committee:* The Safety Committee is responsible for administering the respiratory protection program.

*Associates:* Each associate has the responsibility to wear his or her respirator when and where required and in the manner in which they were trained. Associates must also:

- Care for and maintain their respirators as instructed, and store them in a clean sanitary location.
- Inform their supervisor if the respirator no longer fits well, and request a new one that fits properly.
- Inform their supervisor or the Safety Committee of any respiratory hazards that they feel are not adequately addressed in the workplace and of any other concerns that they have regarding the program.
- Inform their supervisor, if while using their respirator, they experience any symptoms of illness – no matter how minor.

### PROGRAM ELEMENTS

*Selection Procedures:* The Safety Committee along with your Regional Vice President has selected respirators to be used.

*NIOSH Certification:* All respirators must be certified by the National Institute for Occupational Safety and Health (NIOSH) and shall be used in accordance with the terms of that certification. Also, all filters, cartridges, and canisters must be labeled with the appropriate NIOSH approval label. The label must not be removed or defaced while it is in use.

### MEDICAL QUESTIONNAIRE

Associates who are required to wear respirators must complete a Medical Questionnaire Form which will be evaluated by a physician/Occupational Medicine clinic before you are permitted to wear a respirator on the job. Associates are not permitted to wear respirators until a physician has determined that they are medically able to do so. Any associate refusing to fill out the medical questionnaire will not be allowed to work in an area requiring respirator use. A licensed physician will complete medical evaluations if needed based on the information provided on your questionnaire.

Contact your immediate supervisor or an on-property Human Resources associate to take this medical questionnaire.

All examinations and questionnaires are to remain confidential between the associate and the online medical service.

### FIT TESTING

Fit testing is required for associates wearing Air Purifying Respirators for exposure to potentially harmful substances.

Contact your Supervisor to be fitted for a respirator mask. A trained professional will conduct the fit testing as required.

### GENERAL USE PROCEDURES

- Associates will use their respirators under conditions specified by this program, and in accordance with the training they receive on the use of each particular model. In addition, the respirator shall not be used in a manner for which it is not certified by NIOSH or by its manufacturer.
- All associates shall conduct user seal checks each time that they wear their respirator. Associates shall use either the positive or negative pressure check (depending on which test works best for them).
- All associates shall be permitted to leave the work area to maintain their respirator for the following reasons: to clean their respirator if the respirator is impeding their ability to work, change filters or cartridges, replace parts, or to inspect respirator if it stops functioning as intended.
- Associates are not permitted to wear tight-fitting respirators if they have any condition, such as facial scars, facial hair, or missing dentures, that prevents them from achieving a good seal. Associates are not permitted to wear headphones, jewelry, or other articles that may interfere with the face piece-to-face seal.

*Respirator Malfunction:* For any malfunction of a respirator (such as breakthrough, face piece leakage, or improperly working valve), the respirator wearer should inform his or her Supervisor that the respirator no longer functions as intended, and go to the designated safe area to maintain the respirator. The Supervisor must ensure that the associate receives the needed parts to repair the respirator or is provided with a new respirator.

#### CLEANING, MAINTENANCE, CHANGING AND STORAGE

**Cleaning:** *Respirators are to be regularly cleaned and disinfected using disinfectant wipes. Respirators issued for the exclusive use of an associate shall be cleaned and disinfected after each day of use on the job.*

The following procedure is to be used when cleaning and disinfecting respirators:

- Disassemble respirator, removing any filters, canisters, or cartridges.
- Wash the face piece and associated parts in a mild detergent with warm water. Do not use organic solvents.
- Rinse completely in clean warm water.
- Wipe the respirator with disinfectant wipes (Benzalkonium Chloride) to kill germs.
- Air dry in a clean area.
- Reassemble the respirator and replace any defective parts.
- Place in a clean, dry plastic bag or other air tight container.

Note: The Safety Committee will ensure an adequate supply of appropriate cleaning and disinfecting materials are in a respirator storage container. If supplies are low, associates should contact your Supervisor.

*Maintenance:* Respirators are to be properly maintained at all times in order to ensure that they function properly and adequately protect the associate. Maintenance involves a thorough visual inspection for cleanliness and defects. Worn or deteriorated parts will be replaced prior to use.

Associates are permitted to leave their work area to perform limited maintenance on their respirator in a designated area that is free of respiratory hazards. Situations when this is permitted include to wash their face and respirator face piece to prevent any eye or skin irritation, to replace the filter, cartridge or canister, and if they detect vapor or gas breakthrough or leakage in the face piece or if they detect any other damage to the respirator or its components.



**Change Schedules:** *Associates wearing air purifying respirators shall change the cartridges as needed per the manufacturer's guidelines.*

**Storage:** *Respirators must be stored in a clean, dry area, and in accordance with the manufacturer's recommendations. Each associate will clean and inspect their own air-purifying respirator in accordance with the provisions of this program and will store their respirator in plastic containers. Each associate will have his/her name on the container, and that container will only be used to store that associate's respirator.*

A replacement supply of respirators and respirator components (cartridges) will be stored in the maintenance shop.

**Defective Respirators:** Respirators that are defective or have defective parts shall be taken out of service immediately. If, during an inspection, an associate discovers a defect in a respirator, he/she is to bring the defect to the attention of his or her supervisor.

When a respirator is damaged or broken, the associate will be given a replacement of similar make, model, and size.

## **TRAINING**

*Management will provide training to respirator users and their supervisors on the contents of the TPI Hospitality Respiratory Protection Program and their responsibilities under it and on the OSHA Respiratory Protection standard. Workers will be trained prior to using a respirator in the workplace. Supervisors will also be trained prior to using a respirator in the workplace or prior to supervising associates that must wear respirators. The training course will cover the following topics:*

- TPI Hospitality Respiratory Protection Program
- OSHA's Respiratory Protection standard
- Respiratory hazards encountered at TPI Hospitality and their health effects
- Proper selection and use of respirators
- Limitations of respirators
- Respirator donning and user seal (fit) checks
- Fit testing
- Emergency use procedures
- Maintenance and storage
- Medical signs and symptoms limiting the effective use of respirators

Associates will be retrained annually in January or as needed. Associates must demonstrate their understanding of the topics covered in the training through hands-on demonstration the respirator use. Respirator training will be documented on the Life/Safety Training page of the Associate Handbook . This documentation will include the type, model, and size of respirator for which each associate has been trained and fit tested.

## **PROGRAM EVALUATION**

Senior Management will conduct periodic evaluations of the jobsite to ensure that the provisions of this program are being implemented. The evaluations will include regular consultations with associates who use respirators, site inspections, etc.

Problems identified with the Respiratory Protection Program will be promptly corrected by the Safety Committee.

## **DOCUMENTATION AND RECORDKEEPING**

Documentation of respirator training will be kept in the associate's electronic file and stored on property for a minimum of three (3) years. These records will be updated as new associates are trained, as existing

associates receive annual refresher training and as new fit tests are conducted.

Corporate Administrations Office will maintain copies of the medical records for all associates covered under the respirator program. The completed medical questionnaire and the physician's documented findings are confidential and will remain with the physician. Corporate Administrations Office will only retain the physician's written recommendation regarding each associate's ability to wear a respirator.

### ***FRAUD***

As of January 1, 1992 any person who files or contributes to the filing of a false worker's compensation claim is committing a felony, a crime punishable by a prison sentence of up to 5 years, or by a fine of up to \$50,000, or both.

What is a fraudulent claim? Here are some examples of activities for which you could be prosecuted: -

Filing a claim for a non-existent injury

- Filing a claim for a non-work related injury
- Aiding a co-worker in filing a false claim

### ***DISCIPLINARY ACTION***

The enforcement of the regulations is critical if an effective safety program is to be achieved. Safety violations will be handled by a progressive disciplinary procedure. Any associate found to be working under the influence of alcohol or illegal drugs, or any other associate considered to be a serious danger to themselves or other associates, may be automatically terminated without warnings.

Your signed acknowledgement of our AWAIR Safety Program will be maintained as a permanent part of your personnel file.

***MAKE IT A SAFE DAY!!!!***