

INTERNATIONAL INSTITUTE OF COSMETOLOGY

EMPLOYEE HANDBOOK

March 25, 2025

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INTRODUCTION

HANDBOOK DISCLAIMER

The contents of this handbook serve only as guidelines and supersede any prior handbook. Neither this handbook, nor any other policy or practice, creates an employment contract, or an implied or express promise of continued employment with the International Institute of Cosmetology (hereafter IIC or the School).

This handbook is not intended to restrict an employee's right to discuss, or act together to improve, wages, benefits and working conditions with co-workers or in any way restrict employees' rights under the National Labor Relations Act.

CHANGES IN POLICY

Change at IIC is inevitable. Therefore, we expressly reserve the right to interpret, modify, suspend, cancel, or dispute, with or without notice, all or any part of our policies, procedures, and benefits at any time with or without prior notice. Changes will be effective on the dates determined by IIC, and after those dates, all superseded policies will be invalid.

No individual supervisor or manager has the authority to alter the foregoing. Any employee who is unclear on any policy or procedure should consult the School Dean.

WELCOME MESSAGE

Dear Employee,

We extend to you a warm personal welcome. To us, you are someone very special and a vital member of the team. We take pride in our employees, as well as the education and services we provide. We consider ourselves leaders in the beauty industry.

We believe in professional standards, and because of that, we have adopted a written set of policies that apply to our staff. It is important that each employee read this material to become familiar with our policies. This handbook is always available to you, and we hope you consult it regularly.

The success of this school and its students is in your hands. We know we can count on you to be a contributing part of our dedicated team.

Again, a warm welcome.

Sincerely,

A handwritten signature in black ink, appearing to read 'Carmelo Gugliotti', with a stylized flourish at the end.

Carmelo Gugliotti
Founder

GENERAL EMPLOYMENT

AT-WILL EMPLOYMENT

Employment with IIC is "at-will." This means employees are free to resign at any time, with or without cause, and IIC may terminate the employment relationship at any time, with or without cause or advance notice. As an at-will employee, it is not guaranteed, in any manner, that you will be employed with IIC for any set period.

The policies set forth in this employee handbook are the policies that are in effect at the time of publication. They may be amended, modified, or terminated at any time by IIC, except for the policy on at-will employment, which may be modified only by a signed, written agreement between the School Dean and the employee at issue. Nothing in this handbook may be construed as creating a promise of future benefits or a binding contract between IIC and any of its employees.

IMMIGRATION LAW COMPLIANCE

IIC is committed to employing only United States' citizens and aliens who are authorized to work in the United States.

In compliance with the Immigration Reform and Control Act of 1986, as amended, each new employee, as a condition of employment, must complete the Employment Eligibility Verification Form I-9 and present documentation establishing identity and employment eligibility. Former employees who are rehired must also complete the form if they have not completed an I-9 with IIC within the past three years, or if their previous I-9 is no longer retained or valid.

IIC may participate in the federal government's electronic employment verification system, known as "E-Verify." Pursuant to E-Verify, IIC provides the Social Security Administration, and if necessary, the Department of Homeland Security with information from each new employee's Form I-9 to confirm work authorization.

EQUAL EMPLOYMENT OPPORTUNITY

IIC is an Equal Opportunity Employer. Employment opportunities at IIC are based upon one's qualifications and capabilities to perform the essential functions of a particular job. All employment opportunities are provided without regard to race, religion, sex, pregnancy, childbirth or related medical conditions, national origin, age, veteran status, disability, genetic information, or any other characteristic protected by law.

This Equal Employment Opportunity policy governs all aspects of employment, including, but not limited to, recruitment, hiring, selection, job assignment, promotions, transfers, compensation, discipline, termination, layoff, access to benefits and training, and all other conditions and privileges of employment.

The School will provide reasonable accommodations as necessary and where required by law so long as the accommodation does not pose an undue hardship on the business. This policy is not intended to afford employees with any greater protections than those which exist under federal, state or local law.

IIC strongly urges the reporting of all instances of discrimination and harassment, and prohibits retaliation against any individual who reports discrimination, harassment, or participates in an investigation of such report. The School will take appropriate disciplinary action, up to and including immediate termination, against any employee who violates this policy.

Any employee with questions or concerns about equal employment opportunities in the workplace are encouraged to bring these issues to the attention of their Direct Supervisor or the School Dean.

INTERNAL COMMUNICATION

Effective and ongoing communication within IIC is essential. As such, the School maintains systems through which important information can be shared among employees and management.

Bulletin boards are posted in designated areas of the workplace to display important information and announcements. In addition, IIC uses email, SignNow and One Call Now to facilitate communication and share access to documents. For information on appropriate email and Internet usage, employees may refer to the Computer, Email, and Internet Usage policy.

All employees are responsible for checking internal communications on a frequent and regular basis while on the clock. Employees should consult their supervisor with any questions or concerns on information disseminated.

OUTSIDE EMPLOYMENT

Employees may hold outside jobs as long as the employee meets the performance standards of their position with IIC. Unless an alternative work schedule has been approved by IIC, employees will be subject to the School's scheduling demands, regardless of any existing outside work assignments; this includes availability for overtime when necessary. IIC's property, office space, equipment, materials, trade secrets, and any other confidential information may not be used for any purposes relating to outside employment. See Non-compete policy.

CONTINUED TRAINING

After 1st year employment; educators and educator supervisors must complete 12 hours per year (including 4 hours of teaching methodology) of continuing education. Fulfillment of this requirement, on time, is entirely the responsibility of the employee. Training opportunities are available from educators, guest artists, managers, outside vendors and online. You may be assigned to attend special training workshops to help you in your job and to qualify you for a promotion.

EMPLOYMENT STATUS & RECORDKEEPING

EMPLOYMENT CLASSIFICATIONS

For purposes of salary administration and eligibility for overtime payments and employee benefits, IIC classifies employees as either exempt or non-exempt.

Exempt Employees

Exempt employees are exempt from federal and state overtime laws and, but for a few narrow exceptions, are generally paid a fixed amount for each workweek in which work is performed.

Eligibility Criteria (Subject to managerial discretion)

- 1) The employee's primary duty must be the performance of office or non-manual work directly related to management policies or general business operations or the performance of administrative functions in an educational setting in work directly related to academic instruction or training.
- 2) The employee must customarily and regularly exercise discretion and independent judgment.
- 3) The employee may have direct supervisory responsibility of other IIC staff.
- 4) The employee's title may indicate a supervisory position.

Exempt Expectations

- 1) Typical workweek of 40 hours; no overtime hours may be earned. Exempt employees are expected to work the equivalent of their budgeted schedule each week and may find the need to exceed the schedule to perform adequately their duties. In special circumstances, when unusually large amounts of additional work time is required, compensatory time off may be authorized at a time mutually agreed upon by the employee and the supervisor.
- 2) Availability (on-campus or temporarily remote) during campus operating hours for student issues, staff shortages, scheduled vacations, or other responsibilities in line with job responsibilities.
- 3) Temporary remote work permissible with prior approval by supervisor. No remote work accommodation for an extended and regular period is permitted, but rather temporary remote work must be approved on a day-by-day basis.
- 4) Barring unforeseen circumstances, expectation is the overwhelming amount of work hours/week will be completed on-campus, and during regular IIC campus hours.

Non-Exempt Employees

Non-exempt employees are entitled to overtime pay in accordance with federal and state overtime provisions.

Full-Time:

Full-time employees are regularly scheduled to work greater or equal to 30 hours per week. Generally, regular full-time employees are eligible for IIC's benefits, subject to the terms, conditions, and limitations of each benefit program.

Part-Time:

Part-time employees are regularly scheduled to work less than 30 hours per week. Regular part-time employees may be eligible for some IIC benefit programs, subject to the terms, conditions, and limitations of each benefit program.

Seasonal/Per Diem/Contract:

Seasonal/Per Diem/Contract employees include those hired for a limited time to assist in a specific function or in the completion of a specific project. Employment beyond any initially stated period does not in any way imply a change in employment status or classification. Seasonal/Per Diem/Contract employees are not eligible for holiday, vacation, or personal time off pay. Seasonal/Per Diem/Contract employees retain Seasonal/ Per Diem/Contract status unless and until they are notified, by IIC Management, of a change.

Temporary Remote Work

Temporary remote work must be approved ahead of time by supervisor at their discretion and employee must conform to the following:

- 1) IIC does not provide electronic hardware to any staff/educator other than the issuance of iPads for educators to conduct classroom activities. During any approved temporary remote work, the employee is responsible for having and maintaining the necessary equipment to conduct all work functions remotely. IIC administration will assist in working with any exempt employee to set up the necessary access to AWS Appstream, or successor, that will enable an employee to complete temporary remote work.
- 2) An employee completing temporary remote work must be readily available via phone, text, and email during campus hours, and must reply to all pertinent requests in a timely manner. IIC administration reserves the right to utilize software, if necessary, to verify that an employee is actively working and any work associated with an employee's standard duties is being completed in a timely and effective manner.
- 3) An employee completing temporary remote work must also be able to return to campus in case of an emergency, unless campus is temporarily closed, or other contingencies previously discussed with supervisor prevents such return to campus.
- 4) IIC encourages all its employee to complete remote work in a manner, and in an environment, that establishes a safe working environment. Please consult this resource to learn some recommendations on how to establish an [effective remote working space](#).
- 5) To be considered for temporary remote work, the employee must have a proficient or better performance level at the time of consideration and maintain it throughout the time the temporary remote work is in place. If employee is on a performance improvement plan, has received written warning or is in the process of corrective action employee will not be eligible.

If you change positions during your employment with IIC or if your job responsibilities change, you will be informed by the School Dean of any change in your exempt status.

WHILE NOT AT WORK

Nonexempt employees are not to check for, read, send or respond to work-related emails or text messages outside their normal work schedules unless temporarily working from home or specifically authorized based on job duties.

PERSONNEL DATA CHANGES

It is the responsibility of employees to notify promptly their supervisor or the School Dean of any changes in personnel data. Such changes may affect your eligibility for benefits, the amount you pay for benefit premiums, and your receipt of important school information. If any of the following have changed or will change in the future, contact your supervisor or the School Dean as soon as possible:

- Legal name
- Mailing address
- Telephone number(s)
- Change of beneficiary
- Exemptions on your tax forms
- Emergency contact(s)
- Training certificates
- Professional licenses

TERMINATION OF EMPLOYMENT

Termination of employment is an inevitable part of personnel activity within any organization, and many of the reasons for termination are routine. Common circumstances under which employment is terminated include the following:

- **Resignation** - Voluntary employment termination initiated by an employee.
- **Termination** - Involuntary employment termination initiated by the School. In most cases, IIC will use progressive disciplinary actions before dismissing an employee. However, certain actions warrant immediate termination.
- **Layoff** - Involuntary employment termination initiated by for non-disciplinary reasons.
- **Retirement** - Voluntary employee termination upon eligibility for retirement.

Employees who intend to terminate employment with the School, shall provide IIC with at least two weeks of written notice. Such notice is intended to allow the time to adjust to the employee's departure without placing undue burden on those employees who may be required to fill in before a replacement can be found.

Since employment with is based on mutual consent, both the employee and have the right to terminate employment at-will, with or without cause, at any time.

In the case of employee termination, the employee will receive their accrued pay in accordance with all federal, state and local laws.

Any employee who terminates employment with shall return all files, records, keys, and any other materials that are the property of the School.

Employee benefits will be affected by employment termination in the following manner:

- All accrued vested benefits that are due and payable at termination will be paid in accordance with applicable federal, state and local laws.
- Some benefits may be continued at the employee's expense, if the employee elects to do so, such as healthcare coverage.
- The employee will be notified of the benefits that may be continued and of the terms, conditions, and limitations of such continuation.

If you have any questions or concerns regarding this policy, direct them to the School Dean.

WORKING CONDITIONS & HOURS

SCHOOL HOURS

IIC is open for business (these hours are subject to change without notice)

Wethersfield

Monday-Friday 8:30 AM – 5:00 PM (additional evening hours based on program offerings)

Plainville

Monday-Friday 9:00 AM – 5:30 PM (additional evening hours based on program offerings)

Supervisors will advise employees of their scheduled shift, including starting and ending times. Business needs may necessitate a variation in your starting and ending times as well as in the total hours you may be scheduled to work each day and each week.

EMERGENCY CLOSING

At times, emergencies such as severe weather, fires, or power failures can disrupt school operations. In extreme cases, these circumstances may require the closing of a work facility. The decision to close or delay regular operations will be made by IIC management. When a decision is made to close the office, employees will receive official notification from “One Call Now” Service. Weather closings will be posted on WFSB-3, WTNH-8, WVIT-30, and FOX-61.

There are occasions when inclement weather affects road conditions. Generally, if open, all employees are expected to report to work unless major thoroughfares have been closed due to extreme weather conditions. Anyone who decides for themselves not to report to work during inclement weather should notify your direct supervisor.

PARKING

IIC provides parking for employees in the parking lot or other approved parking areas (such as designated Ocean State Job Lot parking areas). There should be ample space for all employees. Vehicles parked in spaces designated for private use will be towed at the owner's expense.

MEAL & BREAK PERIODS

In accordance with state and local laws, non-exempt employees will be provided with meal and break periods. Break periods of 15 minutes will be paid.

Employees are entitled to a 30-minute meal period if scheduled for 7 ½ or more consecutive hours of work. For non-exempt employees, the meal period of 20 minutes or more is unpaid. Non-exempt employees must record the beginning and ending of the meal period using IIC's timekeeping system.

Non-exempt employees must be fully relieved of their job responsibilities and are not permitted to work during unpaid meal periods. If for any reason a non-exempt employee does not take the meal period that they are provided, the employee must notify supervisor immediately.

EMPLOYEE BENEFITS

HEALTH INSURANCE

IIC's health insurance benefits are intended to protect you and your family from financial loss resulting from hospital, surgical, or other health-related expenses.

Full Time employees may elect to begin health insurance benefits after 90 days of full time employment. IIC currently pays 50% of the total cost of the employee for the base medical plan. A dental plan is also available at the employee's expense. We reserve the right to change or stop these plans unilaterally at any time management determines a need to.

This policy provides a summary of the benefits that may be provided at the School's discretion. Actual coverage is determined by the express terms of the plan documents. We encourage both you and your family to review the plan's Health Plan Notice materials carefully.

If there are any conflicts between the handbook or summaries provided and the plan documents, the plan documents will control. The School reserves the right to amend, interpret, modify or terminate any of its employee benefits programs without prior notice to the extent allowed by law.

For details on the specific health insurance plans offered through IIC, as well as copies of the plan documents, contact the School Dean.

HEALTH INSURANCE CONTINUATION

The Consolidated Omnibus Budget Reconciliation Act (COBRA) is a federal law that requires most employers sponsoring group health plans to offer a temporary continuation of group health coverage when coverage would otherwise be lost due to certain specific events.

Through COBRA, employees and their qualified beneficiaries have the right to continue group health insurance coverage after a "qualifying event." The following are qualifying events:

- Resignation or termination of the employee
- Death of the covered employee
- A reduction in the employee's hours
- For spouses and eligible dependents, the employee's entitlement to Medicare
- Divorce or legal separation of the covered employee and their spouse
- A dependent child no longer meeting eligibility requirements under the group health plan

Under COBRA, the employee or beneficiary pays the full cost of health insurance coverage at 's group rates plus an administration fee.

Notification Requirements:

The employee, or family member, has the responsibility to inform IIC Administration of a divorce, legal separation, or a child losing dependent status. The employee, or a family member, has 60 days after the qualifying event to provide such notice, unless a longer period is permitted under rules of the plan. IIC has the responsibility to notify the Plan Administrator of the employee's death, termination of employment, or reduction in hours.

Once the notification has been made to the Plan Administrator, the Plan Administrator will inform the employee that they have the right to choose continuation of coverage. If employees choose to continue coverage, is required to provide coverage that is identical to the coverage provided under the plan to similarly situated employees or family members.

Period of Coverage:

Continuation of coverage is extended from the date of the qualifying event for a period of 18 to 36 months. The length of time for which continuation coverage is made available (i.e., the "maximum period" of continuation coverage) depends on the type of qualifying event that gave rise to the employee's COBRA rights.

An employee's continuation of coverage may be cut short for any of the following reasons:

- No longer provides group health coverage to any of its employees
- The premium for the employee's continuation coverage is not paid in full on a timely basis
- The employee becomes covered under another group health plan that does not contain any exclusion or limitation with respect to any pre-existing condition
- The employee becomes entitled to Medicare

This policy provides a summary of health insurance continuation benefits. Actual coverage is determined by the express terms of the plan documents. We encourage both you and your family to review the plan's Summary Plan Description (SPD) materials carefully.

If there are any conflicts between the handbook or summaries provided and the plan documents, the plan documents will control. IIC Administration reserves the right to amend, interpret, modify or terminate any of its employee benefits programs without prior notice to the extent allowed by law.

For further details on health insurance continuation available through IIC, as well as copies of the plan documents, contact the Health Plan Administrator or School Dean.

RETIREMENT PLAN

IIC employees have the opportunity to participate in a school-sponsored retirement plan following 1 year of service. Full-time and part-time employees are eligible to participate in the plan.

This policy provides a summary of the benefits that may be provided at the School's discretion. Actual coverage is determined by the express terms of the plan documents. We encourage you to review the plan's Summary Plan Description (SPD) materials carefully.

IIC recognizes that planning for the future and retirement is important; therefore, we offer eligible employees (after 1 year of employment and at least \$5,000 in compensation during the preceding calendar year) the opportunity to participate in a Fidelity Investments Retirement Services SIMPLE INDIVIDUAL ACCOUNT with matching contribution. The matching contribution is made by matching your elective deferral contribution dollar for dollar up to 3% of your income.

If there are any conflicts between the handbook or summaries provided and the plan documents, the plan documents will control. The School reserves the right to amend, interpret, modify or terminate

any of its employee benefits programs without prior notice to the extent allowed by law. For details on the specific retirement plans offered through IIC, as well as copies of the plan documents, contact the School Dean.

ACCRUAL OF PAID TIME OFF AND PAID SICK TIME

Eligible employees will earn Paid Time Off (PTO) and Paid Sick Time at different accrual rates beginning January 1, 2025 (see below chart). The PTO and Paid Sick Time policies are separately explained immediately following.

	<u>Accrual Rate PTO</u>	<u>Accrual Rate Paid Sick Time*</u>
• Less than 1 year of service	N/A	0.0333
• After 1 year of service	0.015	0.0333
• After 3 year of service	0.033	0.0333
• After 8 years of service	0.053	0.0333
• After 12 years of service	0.073	0.0333

* Maximum 40 hours of Paid Sick Time may be accrued in a calendar year

PAID TIME OFF (PTO) POLICY

Eligibility

Regular full time or part time employees will be eligible to accrue PTO. Seasonal, Per Diem and contract workers are not eligible to accrue PTO.

Accruing PTO

Employees will accrue time at a designated rate as it relates to number of years with the school. Employee service is based on 1st day of work. Below are the accrual rates:

- After 1 year of service employees milestone accrual rate of 0.015hrs/hr worked
- After 3 year(s) of service employees milestone accrual rate of 0.033 hrs/hr worked
- After 8 year(s) of service employees milestone accrual rate of 0.053 hrs/hr worked
- After 12 year(s) of service employees milestone accrual rate of 0.073 hrs/hr worked

The employee will be allocated their milestone accrual rates annually based upon the anniversary date of their first day of work and their years of service. For non-exempt employees, hours are accrued per hour worked and applied at end of pay period. For exempt employees, hours are accrued based on regularly scheduled hours per week and applied at end of pay period. Any overtime hours will not count towards accrual of PTO.

Employees are allowed to carry negative PTO accrual balances as long as they are planned on being zeroed out through accrual of time worked throughout the year. Any negative balance will be deducted from employee's last calendar payroll to zero out the balance.

Using PTO

Employees are responsible for managing their PTO throughout the year. PTO hours are available in one-hour increments.

To the extent possible, PTO requests should be submitted to an employee's supervisor two (2) weeks in advance to ensure staffing needs are met. However, if other situations arise where advanced notice is not possible, employees need to make their supervisor aware of their absence as soon as possible. Employees are responsible for completing any required paperwork no later than the first day they return to work.

In addition to PTO days, full time and part time employees will be eligible for eight (8) paid holidays listed below:

- New Year's Day
- Martin Luther King Day
- Memorial Day
- Juneteenth (Freedom Day)
- Independence Day
- Labor Day
- Thanksgiving Day
- Christmas Day

Full time and part time employees scheduled to work on the above holidays will be paid for the hours scheduled to work. IIC may require employees to work on holidays not listed above. If the School is closed for regular program instruction (Ex. the day after Thanksgiving or the Summer & December breaks as listed in the School Catalog), then the school is considered closed, and staff/educators are expected to use their available PTO at their discretion.

PTO and Observed Holidays are paid at employee's base pay rate at the time of the absence. It does not include overtime or any special forms of compensation such as incentives, commissions, bonuses, or shift differential.

To the extent permitted by state and local laws, employees must use their earned time prior to December 31st of the calendar year. A maximum of 12 hours of PTO can be carried over to next calendar year. All other unused time will be forfeited.

Upon Termination

Upon termination of employment, regardless of reason, all unused accrued PTO is paid off in last paycheck. Please note that if there is a negative accrued balance, the employee's last paycheck will reflect deduction of that time to zero out the balance.

PAID SICK TIME POLICY

Regular full time and part time employees are eligible for, and will begin accruing, paid sick time on their start date. Employees may use their paid sick time after 120 calendar days of employment.

Paid Sick Time will be tracked based on calendar year, January 1st to January 1st.

All eligible employees will accrue Paid Sick Time at a rate of one (1) hour for every thirty (30) hours worked.

1. Paid Sick Time may be used for:
 - An employee's or employee's family member's illness, injury, or health condition;
 - The medical diagnosis, care, or treatment of the employee or employee's family member;
 - Preventive medical care for the employee's or employee's family member's mental or physical health;
 - The employee's own mental health wellness day;
 - Closure by order of a public official, due to a public health emergency, of either an employer's place of business or a family member's school or place of care;
 - A determination by a health authority, employer of the employee, employer of a family member, or a healthcare provider of whether an employee or employee's family member poses a risk to the health of others due to exposure to a communicable illness, whether or not the employee or family member contracted the communicable illness; **and**
 - Where an employee or employee's family member is a victim of family violence or sexual assault, provided that the employee is not the alleged perpetrator, for the purposes of:
 - Medical care or psychological or other counseling for physical or psychological injury or disability;
 - Obtaining services from a victim services organization;
 - Relocating due to such family violence or sexual assault; **or**
 - Participating in any civil or criminal proceeding related to or resulting from such family violence or sexual assault.

Note: The employee may use Paid Sick Time for vacation days. If the employee chooses not to use Paid Sick Time for the above listed reasons, it becomes a PTO request and the time off should be requested and approved in advance. In order to use Paid Sick Time for vacation time the time must be already accrued by the vacation date. Additional Paid Sick Time will not be provided when an employee chooses to use sick time as vacation time.

2. Paid Sick Time may be taken in **one (1) hour increments**.
3. Paid Sick Time is paid at the employee's base pay rate or minimum wage, whichever is greater, on the day the time is used. It does not include overtime or any special forms of compensation such as incentives, commissions, bonuses, or shift differentials.
4. Employees accrue Paid Sick Time for hours actually worked. Paid Sick Time is not accrued when an employee is on vacation, for holidays (unless actually worked), leaves of absence including FMLA, military leave, bereavement leave, personal leaves, jury duty and/or other days off.
5. Although not required, the School would appreciate advance notice whenever possible, i.e. for medical appointments.
6. Employees must adhere to the School's call-out policy when using Paid Sick Time.
7. Employees must identify whether they are using PTO or Paid Sick Time when calling out.

8. Employees are responsible for completing any required paperwork no later than the first day they return to work.
9. Employees must accrue Paid Sick Time before using. Employees may not “borrow” against future accruals. Employees who call in “sick” without accrued Paid Sick Time available will be required to use PTO if available.
10. Employees are allowed to roll over up to forty (40) hours of accrued unused Paid Sick Time ***but are not allowed to use more than forty (40) hours of paid sick time per calendar year.***
11. An employee may choose to have unused Paid Sick Time paid out instead of rolled over. The employee must submit the request to the School Dean by December 15 and unused Paid Sick Time will be paid out in the 1st pay period in January.
12. Available, unused Paid Sick Time **will not** be paid out upon voluntary or involuntary termination.

EMPLOYEE DISCOUNT PROGRAM

IIC offers a 40% off percent discount off regular priced products/services. This employee discount extends to Employees only. Questions regarding this policy should be directed to the School Dean.

EDUCATIONAL CREDIT

IIC will reimburse Full time and Part Time employees up to \$200/year for training provided:

- 1- The course or seminar is approved by the Owner/Director before the course is started.
- 2- The course or seminar is successfully completed; i.e. Certificate attained

IIC will not cover kit or travel costs, days missed from work will not be paid and classes must be approved by administration.

EXPENSE REIMBURSEMENT

IIC reimburses employees for necessary expenditures and reasonable costs incurred while doing their jobs. Expenses incurred by an employee must be approved in advance by the School Dean. To be reimbursed, employees must submit expense reports to the School Dean in advance for approval. The report must be accompanied by receipts or other documentation substantiating the expenses.

MILEAGE REIMBURSEMENT

You will be reimbursed actual mileage (does not include normal commuting time associated with travel to/from work), tolls, and parking fees. Mileage will be reimbursed at the IRS standard mileage rate. This rate takes into account all actual expenses including fuel, oil, maintenance, insurance, depreciation, etc. The reimbursement rate will be adjusted as necessary per IRS guidelines.

IIC will not reimburse any parking tickets, speeding tickets or other fines/costs incurred while driving a personal vehicle for business purposes. Additionally, any costs associated with the maintenance, fuel, vehicle breakdown, or damage incurred while driving a personal vehicle are covered in the standard mileage rate and will not be reimbursed.

Employees who wish to be reimbursed for mileage must document and submit their itemized mileage on the Mileage Form, recording the date, the place to which they traveled, as well as the number of miles driven and submit it to their manager for approval. Employees must also submit

documentation outlining their commute through <http://maps.google.com/>. Google is preferred because it shows step by step route details, can show several destinations in the same trip and can be printed without the map or advertisements. To conserve paper and toner, it is not necessary to print the maps or to print in color.

For any toll and parking reimbursement, employees must also attach the original toll or parking receipt to the form. Toll and parking expenses without original receipts will not be reimbursed.

Employees may only claim miles driven for business purposes. Mileage driven for lunch is only permitted where lunch is part of school business; and employees cannot seek reimbursement for their daily commute to/from work. IIC defines daily commute as travel to/from either the Wethersfield or Plainville campus on a given day.

Employees caught making false claims about mileage usage, exaggerating miles driven, claiming miles that were not related to regular school business or any other misreporting will be subject to disciplinary action up to and including termination.

IIC will not be held liable for any accidents, damages or losses incurred by employees while using a personal vehicle for business purposes.

TUITION DISCOUNT

Immediate family members (parents, spouses, children) of employees are eligible to receive a 5% discount on the cost of tuition (discount does not apply to supplies, toolkit items, taxes, or fees). All applicants will be required to complete the standard enrollment process. Questions regarding this discount should be directed to the School Dean.

WORKERS' COMPENSATION

Employees who are injured on the job at IIC are eligible for Workers' Compensation benefits. Such benefits are provided at no cost to employees and cover any injury or illness sustained in the course of employment that requires medical treatment.

Employees who sustain work-related injuries or illnesses must notify their supervisor immediately so that IIC can notify the workers' compensation insurance carrier as soon as possible.

Lost time or medical expenses incurred as a result of an accident or injury which occurred while an employee was on the job will be compensated in accordance with workers' compensation laws. This protection is paid for in full by IIC. No premium is charged for this coverage and no individual enrollment is required. IIC will provide medical care and a portion of lost wages through our insurance carrier. All job-related accidents or illnesses must be reported to an employee's supervisor immediately upon occurrence. Supervisors will then immediately contact the School Dean to obtain the required claim forms and instructions.

LEAVE OF ABSENCE

LEAVE OF ABSENCE

IIC provides employees with job protection up to 180 calendar days while on an approved Leave of Absence (LOA). Please contact your supervisor for information on applying for Leave.

CT PAID FAMILY LEAVE

Effective January 1, 2022, eligible employees may be entitled to a leave of absence under the Connecticut Family and Medical Leave Act ("CTFMLA"). See www.ctpaidleave.org for more information.

Below is a summary of rights and obligations under the CTFMLA.

Eligible Employees

Employees who have been employed by for at least 3 months are eligible to take a leave of absence ("CTFMLA leave") if they meet the conditions set forth in this policy.

Basic Leave Entitlement

Eligible employees may take up to 12 weeks of CTFMLA leave during any 12-month period:

- For the birth of a child;
- For the placement of a child with the employee for adoption or foster care;
- To care for a family member with a serious health condition;
- To care for an employee's own serious health condition;
- Because of a qualifying exigency arising out of the fact that the employee's spouse, son, daughter, or parent is on active duty or has been notified of an impending call or order to active duty, in the armed forces;
- To serve as an organ or bone marrow donor.

Eligible employees may take up to two additional weeks of leave for a serious health condition resulting in incapacitation that occurs during a pregnancy.

Eligible employees must take CTFMLA leave within 12 months of the birth or placement of a child.

A serious health condition means an illness, injury, impairment or physical or mental condition that involves inpatient care in a hospital, hospice, nursing home or residential medical care facility, or continuing treatment by a healthcare provider.

For the purposes of this policy, a family member means spouse, sibling, son or daughter, grandparent, grandchild, or parent, or an individual related to the employee by blood or affinity whose close association the employee shows to be the equivalent of those family relationships.

Intermittent or Reduced Schedule Leave

Employees may take leave for the birth or placement of a child intermittently or on a reduced schedule with approval of the School. When medically necessary, employees may take leave for a serious health condition intermittently or on a reduced schedule.

Notice

Where the need for leave is foreseeable, employees must provide at least 30 days' notice of the need for leave. If 30 days' notice is not possible, employees must provide as much notice as is practical. Where possible, employees should make a reasonable effort to schedule medical treatment in a way that does not disrupt the operations of the School.

Medical Certification

The School may require that the employee submit a medical certification issued by the treating health care provider.

Benefits Continuation

Employees taking CTFMLA leave will not lose any benefits they accrued before their CTFMLA leave began. In addition, the School will maintain any existing benefits coverage while the employee is on leave provided the employee continues any contributions that the employee would have made if the employee had continued employment.

Employees are not entitled to any benefit other than the benefits to which they would have been entitled had they not taken CTFMLA leave. In addition, employees will not accrue any additional seniority or employment benefits while on leave.

Compensation

During leave, employees may be eligible for wage-replacement benefits through the state. The state will determine whether you are eligible for paid family and medical leave benefits, including the amount of benefits you may receive. Your entitlement to benefits is subject to the terms and conditions established by the state. Employees may also opt to use any available, accrued paid time off for this purpose.

Return to Work

Under most circumstances, an employee is entitled, upon return from leave, to be reinstated to the position they held before going on leave, or to be placed in an equivalent position with equivalent employment benefits, pay and other terms and conditions of employment. An employee, however, has no greater right to reinstatement or to other benefits and conditions of employment than if he or she had been continuously employed during the CTFMLA leave period.

Relationship with Federal Family and Medical Leave and Other Leave Policies

Generally, leave taken under the CTFMLA must be taken concurrently with leave taken under the federal Family and Medical Leave Act ("FMLA"). Where applicable, when an employee's leave qualifies under CTFMLA and under the federal FMLA, the leave used counts against the employee's entitlement under both laws. To the extent the offers the employee leave through another plan or policy, the plan or policy with the greatest protection will apply.

Retaliation Prohibited

The School will not retaliate against employees for exercising their rights under the law. Employees who have any questions or concerns regarding this policy should contact their supervisor or the School Dean.

MILITARY LEAVE

IIC grants employees time off for service, training and other obligations in the uniformed services in accordance with the Uniformed Services Employment and Reemployment Rights Act (USERRA) and any other applicable state law.

All employees requesting time off for military service must provide advance notice to their immediate supervisor, unless military necessity prevents such notice or it is otherwise impracticable. Continuation of health insurance benefits is available during military leave subject to the terms and conditions of the group health plan and applicable law.

Employees are eligible for reemployment for up to five years from the date their military leave began. The period an individual has to apply for reemployment or report back to work after military service is based on time spent on military duty and on applicable law. For reinstatement guidelines, contact the School Dean. Employees who qualify for reemployment will return to work at a pay level and status equal to that which they would have attained had they not taken military leave. They will be treated as though they were continuously employed for purposes of determining benefits based on length of service.

IIC complies with all rights and protections under all applicable state laws granting time off for service, training, and other obligations in the uniformed services. This includes, but is not limited to, benefits entitlement and continuation, notice and recertification requirements, and reemployment application requirements. Questions regarding this policy should be directed to the School Dean.

FAMILY MILITARY LEAVE

Employees may be eligible to take a one-time benefit of up to 26 workweeks of leave during any 12 month period when their spouse, parent, child or next of kin is a current member of the armed forces and is undergoing medical treatment, recuperation or therapy, or is otherwise in outpatient status, or is on the temporary disability retired list for a serious injury or illness incurred in the line of duty.

To be eligible, employees must have been employed with for at least three months.

Family military leave is unpaid; however, employees may opt to use accrued paid time off for this purpose. Separately, employees may be eligible for up to 12 weeks of wage-replacement benefits through the state. The state will determine whether you are eligible for wage-replacement benefits, including the amount of benefits you may receive. Your entitlement to those benefits is subject to the terms and conditions established by the state.

Where the need for leave is foreseeable, employees must provide at least 30 days' notice of the need for leave. If 30 days' notice is not possible, employees must provide as much notice as is practical. Where possible, employees should make a reasonable effort to schedule leave so that it does not disrupt the operations of the School.

Family military leave may be taken intermittently or on a reduced schedule, with prior approval and the appropriate certification.

Employees must be prepared to provide with certification from the proper military authority to verify the employee's eligibility for family military leave.

Upon expiration of the leave, an employee will generally be reinstated to their position with equivalent seniority, benefits, pay and other terms and conditions of employment.

Relationship with and Other Leave Policies

To the extent permitted by law, Connecticut's Family Military leave will run concurrently with leave taken under the federal Family and Medical Leave Act ("FMLA"). If an employee meets the qualifications of both laws, the School will provide the more generous of the two benefits.

Questions Regarding Family Military Leave

Employees who have any questions or concerns regarding this policy should contact their supervisor or the School Dean.

CIVIL AIR PATROL LEAVE

Effective October 1, 2019, members of the Civil Air Patrol may be allowed a leave of absence to:

- Respond to an emergency declared by the Governor or the President of the United States;
- Respond to a request for assistance in an emergency, natural disaster, or life-threatening event at the request of the U.S. Air Force or Coast Guard, Department of Emergency Services and Public Protection, the Division of Emergency Management and Homeland Security, state police, or local police department; or
- Participate in required emergency services training programs and exercises.

Civil Air Patrol leave is unpaid; however, employees may use accrued paid time off for this purpose.

Notice and Verification: Employees who are members of the Civil Air Patrol must notify that they may be called to participate in training or to serve in an emergency, natural disaster, or life-threatening event. This notice must be provided when the employee starts working for the School, or by the date on which the employee joins the Civil Air Patrol, whichever is latest.

Employees must give as much notice as possible of their need for such leave and provide written verification from the Civil Air Patrol that confirms their eligibility for the leave requested.

Reinstatement: Upon expiration of the leave, an employee will generally be reinstated to their position with equivalent seniority, benefits, pay and other terms and conditions of employment.

Retaliation Prohibited: IIC will not retaliate against employees for exercising their rights under the law.

Questions Regarding Civil Air Patrol Leave: Employees who have any questions or concerns regarding this policy should contact the School Dean.

JURY DUTY LEAVE

IIC encourages employees to fulfill their civic responsibilities when called upon to serve as a juror. Employees must provide their immediate supervisor with a copy of their jury summons as soon as possible so that the supervisor may make arrangements to accommodate their absence. Either IIC or the employee may request an excuse from jury duty if it is determined that the employee's absence would create serious operational difficulties.

If a full-time employee reports for jury duty and/or serves on a jury, paid time off will be granted for the first 5 days of service or part thereof. Jury duty pay will be calculated on the employee's base pay rate times the number of hours the employee would otherwise have worked on the day of absence. For purposes of this policy, a full-time employee means an employee normally working 30 or more hours per week.

If a part-time employee reports for jury duty and/or serves on a jury, unpaid time off to serve will be granted; however, part-time employees may opt to use accrued paid time off for this purpose.

An employee who has served eight hours of jury duty in any one day will be not required to report to work on that day.

Employees should consult with the School Dean for more information on eligibility for compensation under this policy.

DOMESTIC VIOLENCE LEAVE

Under CT state law, employees who are victims of domestic violence are entitled to a reasonable leave of absence to:

- Seek attention for injuries caused by domestic violence, including for a child who is a domestic violence victim, so long as the employee isn't the perpetrator;
- Obtain services, including safety planning, from a domestic violence agency or rape crisis center;
- Obtain psychological counseling, including for a child, so long as the employee did not commit domestic violence against the child;
- Take other actions to increase safety from future incidents, including temporary or permanent relocation; or
- Obtain legal services, assist in the offense's prosecution, or otherwise participate in related legal proceedings.

Certification

An employee who is absent from work for a covered reason must, within a reasonable time after the absence, provide certification to the School Dean. The certification must be in the form of:

- A police report indicating that the employee or the employee's child was a victim of domestic violence;
- A court order protecting or separating the employee or employee's child from the perpetrator of an act of domestic violence;
- Other evidence from the court or prosecuting attorney that the employee appeared in court; or
- Documentation from a medical professional, domestic violence counselor, or other healthcare provider that the employee or the employee's child was receiving services, counseling, or treatment for physical or mental injuries or abuse resulting in victimization from an act of domestic violence.

Domestic violence includes incidents resulting in physical harm, bodily injury, assault or an act of threatened violence between family or household members. It also includes stalking, threatening behavior, or coercive control.

Pay During Leave

The leave will be unpaid unless the employee elects to use paid time off or sick time they have accrued. Employees may be eligible for wage-replacement benefits from the state. To be eligible for wage-replacement benefits, employees must meet certain wage-base thresholds and other requirements. The CT Paid Leave Authority administers the program and will determine an applicant's eligibility for benefits as well as the amount of benefits the applicant may receive. The School doesn't make this determination.

Reinstatement

Upon completion of the leave under this policy, the employee will be returned to the position they held at the time when the leave commenced, or to a position with equivalent benefits, pay and other terms and conditions of employment.

Relationship with Other Leave Policies

To the extent the offers the employee leave through another plan or policy, the plan or policy with the greatest protection will apply.

Retaliation Prohibited

The School will not take adverse action against an employee for exercising their rights under the law. If you have questions about this policy, including your eligibility for leave, please contact the School Dean.

COURT ATTENDANCE LEAVE

Employees may be eligible for leave to attend to certain court related matters such as:

- The employee obeys a legal subpoena to appear before any court of Connecticut as a witness in any criminal proceeding,
- The employee attends a court proceeding or participates in a police investigation related to a criminal case in which the employee is a crime victim,
- The employee attends or participates in a court proceeding related to a civil case where the employee is a victim of family violence, or
- A restraining or protective order has been issued on the employee's behalf by a court.

To the extent possible, employees must provide supervisor with notice of the need for leave under this policy as soon as possible after receipt of the subpoena or becoming aware of the need for such leave.

Leave is unpaid; however, employees may use accrued paid time off for this purpose. Employees must provide IIC with certification to verify the employee's eligibility for the leave requested.

ACCOMODATIONS

PREGNANCY ACCOMMODATION POLICY

Employees who are limited in their abilities to perform their jobs because of pregnancy, childbirth, related medical conditions or lactation may request a reasonable accommodation as is necessary. IIC will provide eligible employees with reasonable accommodations as long as the accommodation does not impose an undue hardship on the School. Reasonable accommodations may include, but are not limited to:

- Sitting while working
- Periodic rest
- Light duty assignments or assistance with manual labor
- Job restructuring
- Modified work schedules
- Temporary transfers to less strenuous or hazardous work
- Time off to recover from childbirth
- Break time and appropriate facilities for expressing breast milk

If an employee takes leave as an accommodation, the leave is unpaid; however, employees may use accrued paid time off for this purpose. To the extent allowed by law, leave taken under this policy runs concurrently with leave provided under other relevant laws. Upon expiration of leave taken under this policy, an employee will generally be reinstated to her position with equivalent seniority, benefits, pay and other terms and conditions of employment. **Note:** Employees may be entitled to a reasonable leave of absence for a disability resulting from pregnancy.

The School will not retaliate against an employee who requests or uses a reasonable accommodation under this policy. Employees should speak with the School Dean to discuss their need for reasonable accommodation or for questions regarding this policy.

LACTATION BREAKS

As part of our family-friendly work environment, IIC provides a supportive environment to enable lactating employees to express breast milk during working hours.

Lactation Accommodations

For up to one year after the child's birth, any employee who is breastfeeding their child will be provided reasonable break time to express breast milk each time the employee has need to express the milk.

Nursing employees must request and arrange with their manager/supervisor appropriate and reasonable break time for lactation purposes. Managers/ Supervisors must attempt to provide as much schedule flexibility and break times as reasonably possible to accommodate the employee's needs. An employee may be granted a flexible work arrangement to allow for time off to express milk.

Lactation Space

The School will provide breastfeeding employees with space to express breast milk a place that is shielded from view and free from intrusion from coworkers and the public. The room or location

may include the place where the employee normally works if it otherwise meets the requirements of the lactation space.

The lactation space shall:

- Not be a restroom
- Be safe, clean, and free of toxic or hazardous materials
- Contain a place to sit, a surface to place a breast pump and personal items
- Have access to electricity
- Have access to a sink with running water and a refrigerator in close proximity to the employee's work area
- Potentially be a multi-purpose room if they satisfy the requirements for space; however, use of the room for lactation takes priority over other uses

Other appropriate locations may include the employee's own office, another private office not in use, or any available area with a locking door where the employee can have privacy from others for lactation purposes.

Employee Responsibilities

Employees who wish to express milk during the work period shall keep their manager/supervisor informed of their needs so that appropriate accommodations can be made to satisfy the needs of both the employee and the School. When an employee needs an additional, or a change to a current lactation break(s), the employee must work with their manager/supervisor to discuss an adjustment or change in schedule.

Breastfeeding employees are responsible for keeping milk expression areas clean, using antimicrobial wipes to clean the pump and the area around it. Employees are also responsible for keeping the general lactation room clean for the next user. This responsibility extends to both designated milk expression areas and other areas where milk may be expressed.

Employees must label all milk expressed with their name and date collected so it is not inadvertently confused with another employee's milk. Employees should remove expressed milk stored in refrigerator by close of business every day.

Zero Tolerance

Breastfeeding should not constitute a source of discrimination in employment or in access to employment. It is prohibited under this policy to harass a breastfeeding employee; such conduct unreasonably interferes with an employee's work performance and creates an intimidating, hostile or offensive working environment. Any incident of harassment of a breastfeeding employee will be addressed in accordance with the School's policies and procedures for discrimination and harassment.

DISABILITY ACCOMMODATIONS

Accommodations for Individuals with Disabilities: IIC will make reasonable accommodations, as required by law, for the known physical or mental disabilities of an otherwise qualified applicant or employee, unless doing so would impose an undue hardship upon the IIC's business operations. An accommodation is not reasonable if, even with the accommodation, the employee is unable

to perform essential job duties in a manner that would not endanger the employee's health or safety of the employee or others.

Any applicant or employee who believes they require an accommodation in order to perform the essential functions of the job should contact the School Dean to request such an accommodation. Employees should specify what accommodation they need to perform the job and submit supporting medical documentation explaining the underlying physical or mental disability and the basis for the requested accommodation. IIC then will review and analyze the request, including engaging in an interactive process with the employee or applicant, to identify if such an accommodation can be made. IIC will evaluate requested accommodations, and as appropriate identify other possible accommodations, if any. The employee will be notified of IIC's decision regarding the request within a reasonable period. IIC treats all medical information submitted as part of the accommodation process in a confidential manner.

RELIGIOUS ACCOMMODATIONS

IIC will endeavor to accommodate the sincere religious beliefs of its employees to the extent such accommodation does not pose an undue hardship on IIC's operations. If employees wish to request such an accommodation, they should contact their Direct Supervisor.

SERVICE ANIMAL POLICY

IIC prohibits bringing a pet (a domestic animal kept for pleasure or companionship) to work or having a pet in IIC-controlled buildings and premises, with the exception of certified service animals for a person with disabilities.

Service Animals for Employees

According to the Americans with Disabilities Act (ADA), a service animal is defined as "any animal individually trained to work or perform tasks for the benefit of an individual with a disability, including, but not limited to, guiding individuals with impaired vision, alerting individuals to an impending seizure or protecting individuals during one, and alerting individuals who are hearing impaired to intruders, or pulling a wheelchair and fetching dropped items."

A person with a disability uses a service animal as an auxiliary aid. In compliance with the ADA, service animals are welcome in all buildings on school property and may attend any class, meeting or other event. However, there may be an exception to certain areas.

Employees requesting an accommodation for a disability that includes a certified service animal must contact their manager and complete an Accommodation Request Form. All requests for accommodation will be reviewed by management to ensure the School can reasonably accommodate such requests without causing an undue hardship.

Reasonable behavior is expected from service animals while on school property. The owners of disruptive and aggressive service animals may be asked to remove them from IIC facilities. If the improper behavior happens repeatedly, the owner may be told not to bring the service animal into any facility until the owner takes significant steps to mitigate the behavior.

Cleanliness of the service animal is mandatory. Consideration of others must be taken into account when providing maintenance and hygiene of service animals. Employees must ensure their

animal goes outside to relieve their animal and cleans up after them. If an accident happens, the owner is expected to clean and dispose of all animal waste.

Service Animals for Students/Clients

Customers with certified service animals and pets will be allowed into the school as long as the animal is not being disruptive or aggressive towards other students/clients or animals. Owners must also clean and dispose of all animal waste.

If a student/clients animal is being disruptive or aggressive in the school, employees may politely ask if they can assist with anything to calm their animal down or to relocate them to another part of the school in order to not disrupt operations. Students/clients that are unable to calm their animal down may be asked to leave. Student/clients that do not cooperate with such requests must be referred to management.

JOB DESCRIPTIONS/ HIERARCHY

EDUCATION TEAM

DIRECTOR OF EDUCATION

- Establish daily hours of operation
- Conduct student counseling sessions regularly
- Aid in hiring, training, scheduling, evaluating, and managing educators
- Aid in the development and implementation of new programs and course offerings
- Schedule the instructional classes, day and evening
- Oversee the academic progress, evaluation, and determination of possible additional tutoring for students “at risk”
- Establish all rules and regulations pertaining to student conduct, classroom assignments, attendance, student salon services, and grading
- Report directly to the Ownership

ASSISTANT DIRECTOR OF EDUCATION

- Possess all Educator responsibilities and competencies
- Supervise the overall daily operations of the School
- Perform staff evaluation as to theory class and practical demonstrations
- Assist in student practical evaluations
- Help oversee the academic progress, evaluation, and determination of possible additional tutoring for students “at risk”
- Assist in enforcement of all rules and regulations pertaining to student conduct, classroom assignments, attendance, student salon services, grading
- Enforce all student rules and regulations pertaining to student conduct, classroom assignments, attendance, student salon services, and grading
- Enforce all rules and regulations pertaining to instructional personnel
- Direct any staff and/or issues to School Dean
- Ensure appropriate safety signs are placed where applicable to maintain safety protocols, such as wet floor, etc.
- Monitor school grounds for potential hazards and take appropriate action to rectify
- Report directly to the Director of Education

LEAD EDUCATOR

- Possess all Educator responsibilities and competencies
- Aid the Director of Education in daily tasks
- Assist in enforcement of all rules and regulations pertaining to student conduct, classroom assignments, attendance, student salon services, grading
- Enforce all student rules and regulations when Assistant Director of Education not available/present.
- Direct the on-boarding, training, and mentorship of new educators
- Report directly to the Assistant Director of Education

EDUCATOR/BRAND AMBASSADOR

- Possess all Educator responsibilities and competencies
- Educate students as directed by Director of Education
- Schedule and coordinate classes with outside vendors
- Motivate and advise students/teachers of outside competitions, scholarships and contests
- Revisit the advanced academy: work with influencers to schedule advanced classes
- Setup, coordinate photo and video shoots for marketing and social media advertising
- Capture and post content that follow current social media trends and still capture our brand
- Work with Director of Education on providing additional education to teaching staff

EDUCATOR / EDUCATOR SUPPORT

- Hold valid educator training and an active State of CT Hairdresser/Cosmetician license
- Maintain clean and safe designated area
- Monitor student salon floor for potential hazards and infractions
- Instruct students in theory, practical and student salon assignments
- Instruct classes and supervise student salon floor operation
- Follow LAB Curriculum
- Evaluate effectiveness of curriculum, teaching methods and student progress
- Assist students with retail and service sales skills
- Maintain records related to student progress
- Motivate, encourage and counsel students
- Administer and grade practical and theory work/exams
- Conduct practical demonstrations and record content to be shared for social media
- Maintain positive work relationship with coworkers
- Supervise sanitation duties
- Enforces all rules and regulations pertaining to student conduct, classroom assignments, punctuality, and student salon services and grading
- Report directly to the Director of Education or Assistant Director of Education

COMPETENCIES

- *Customer Focus*
 - Listen to customers, build relationships and identify and resolves customer concerns in a consistent manner, or ask for assistance as needed
 - Discover customer needs through empathetic questioning, offer options, and implement appropriate solutions to encourage loyalty and retention
 - Document customer contacts and lessons learned
- *Professionalism*
 - Display personal composure and an upbeat attitude; treat all others with respect and politeness; demonstrate a strong work ethic, regardless of task
 - Demonstrate can-do attitude, persistence and commitment in achieving goals; strive for excellent results in all projects
- *Accountability*

- Demonstrate proficiency needed to plan and perform assigned work and accept accountability for results; use documented procedures and identify problems early
- *Communication*
 - Listen to others in an attentive and focused manner
 - Express self clearly (both appropriately and timely), verbally and in writing
 - Restate what has been heard in own words, and ask clarifying questions to ensure complete understanding; model open communication across all parts of the school and encourage others to do the same
 - State clearly desired outcomes, check for understanding, and deliver feedback with empathy, respect and clarity, keeping focus on behavior, not personalities
 - Assist disparate groups understand one another
- *Teamwork*
 - Cooperate with other team members to complete tasks and achieve objectives; share information openly; act as an ensemble player
 - Act in best interest of team over self; actively seek participation and recognize individual perspectives; encourage cooperation and team communication
 - Seek and show appreciation for all contributions from team, facilitate role clarification and conflict resolution among team members when appropriate
- *Compassion & Ethics*
 - Consider opinions of others and seek input from diverse groups; build positive working relationships in school and community; speak truthfully even in difficult situations
 - Demonstrate authentic interest in school and community; offer encouragement and support to others; inspire trust through actions consistent with intent; demonstrate respect without showing favoritism
- *Leadership*
 - Ask questions and seek to improve own performance; apply information gained from others' work; demonstrate enthusiasm and competence; offer positive suggestions for improvements to assigned projects
 - Use enthusiasm, passion, and knowledge to engage others in task; build consistently own skills and knowledge; encourage and mentor others; sought as a resource and recognized as an expert
 - Use mentoring skills to take others beyond their perceived limitations; develop new processes and procedures through listening to alternative ideas and synthesize optimal solutions from all contributions

FRONT DESK

- Possess all Educator competencies
- Follow open/end of day checklist (if applicable)
- Maintain reception area stocked and clean
- Close register every afternoon and follow closing procedures
- Wash, fold and stock towels throughout day
- Enter, cash out, and update clients and assign to student
- Treat clients like guests
- Notify appropriate person of appointments
- Notify Admissions of appointment arrival or walk-in visit
- Answer and transfer calls
- Clean glass doors and counter tops

- Clean retail area (not just around retail...everything comes off shelves)
- Wipe down sofa/seating if needed
- Sanitize computers, phones, and register at end of day
- Tidy reception area
- Water plants twice a week
- Sweep reception area floors rug & stairs
- Oversee cleanliness of salon floor throughout the day
- Restock fragrance, soap, paper towel and toilet paper dispensers
- Report directly to the Assistant Director of Education

STAFF TEAM

OWNERSHIP

Responsible for overall school operations

OWNERSHIP LIASION

Oversee communication between Ownership team and staff

CHIEF FINANCIAL OFFICER

- Create annual budget
- Ensure budget numbers are followed by each department
- Serve as a financial consultant for students
- Administer loan responsibilities for students who qualify
- Strategize new savings and investment approaches
- Strategize new School ventures and business opportunities
- Assist the Ownership with operations

SCHOOL DEAN

- Oversee daily operations of the School
- Oversee School compliance
- Oversee all educators in theory classes
- Ensure students are receiving assistance as needed
- Oversee curriculum follow thru
- Aid in coordination of educator trainings
- Observe that students and staff follow Handbook and policies
- Schedule leave of absences, contract changes, and other relevant processes
- Conduct administrative hearings, suspensions, and terminations of students as needed
- Perform yearly staff evaluations
- Report directly to the Ownership/Board of Trustees

DIRECTOR OF FINANCIAL AID

- Possess all Financial Aid Coach duties
- Write company policies and help employees and students adhere

- File student records in regards to Title IV funding and audit preparedness
- Send proper information to 3rd party servicer and follow through to ensure items punctual
- Transfer funds from the federal account to the operating account
- Work with student accounts department for proper data entry
- Communicate constantly with the Admissions department
- Mentor Financial Aid Coaches in all job responsibilities; complete annual reviews
- Report directly to the Chief Financial Officer

DIRECTOR OF ADMISSIONS

- Possess all Admissions Coach duties
- Ensure all communications are returned within 24 hours (48 hours weekends/holidays)
- Plan and reserve all graduation related duties
- Ensure Admissions presence at Career Fairs/Mixers
- Employ new methodologies to increase enrollment and Admissions functions
- Demonstrate flexibility for prospective student meetings outside regular work hours
- Fulfill all registration tasks and application forms
- Coordinate all other office preparations regarding new students and prospects
- Arrange meetings regularly with Guidance Counselors or other contacts for lead generation
- Mentor Admissions Coaches in all job responsibilities; complete annual reviews
- Report directly to School Dean

DIRECTOR OF MARKETING & BRANDING

- Handle prospective student inquiries
- Help and be familiar with admissions process, including orientation
- Develop, implement, evaluate advertising program
- Build clientele in the student salon area
- Aid graduates and students in job placement
- Work with salons, sales representatives, clientele, graduates, advertising representatives
- Organize fundraisers and events
- Coordinate with the Director of Education to set up demonstrations by salons at the School
- Report directly to School Dean

ADMISSIONS COACH

- Generate and contact leads
- Contact salons, as necessary, about possible leads
- Contact high schools about possible leads
- Coordinate career fairs with high schools and other organizations
- Create career shadow days
- Schedule tours and interviews
- Complete tours and interviews
- Register students
- Ensure all paperwork is filed and signed correctly
- Assist students be placed in the profession
- Maintain open communication with the Financial Aid department

- Plan promotional events to raise the visibility of the school among its various publics
- Host and coordinate open house events to facilitate student enrollment
- Plan retention events to hold current applications
- Assist prospective students with the correct and accurate information
- Maintain clean and safe designated area
- Report directly to Director of Admissions

FINANCIAL AID COACH

- Counsel students and parents about financial aid eligibility, federal aid programs, application process and procedures, and financial need in accordance with Title IV Federal regulations
- Assist with default management
- Assist Admissions Team with prospective students by pre-qualifying potential students by accessing NSLDS for Title IV eligibility and determining dependency status
- Conduct financial need analysis and determine eligibility for Title IV Federal Aid programs, input financial aid awards into a system
- Ensure that awarded financial aid is packaged in accordance with Title IV regulations in regards to disbursement dates, verification completed if applicable and appropriately disbursed and credited to the students' account; Identify problems related to award delivery and communicate with the appropriate individual or department for resolution
- Provide direction to students on how to resolve data conflicts which result from application misinformation
- Review appeal documents for accuracy and completeness prior to submission to Director of Financial Aid
- Perform exit interviews and loan counseling to students upon graduation and during initial packaging appointment
- Assist with financial aid workshops or outreach programs for students, parents, faculty and staff
- Assist students in developing and implementing realistic financial budgets and determine available options
- Develop and maintain current knowledge of financial aid programs and eligibility requirements by attending trainings, workshops and conferences.
- Must be able to communicate effectively in classrooms during scheduled orientations and/or contact students in regards to financial aid matters such as paperwork needed, payments, etc.
- Perform other job-related duties as assigned
- Work with student accounts department for proper data entry
- Communicate constantly with the Admissions department
- Report directly to the Director of Financial Aid

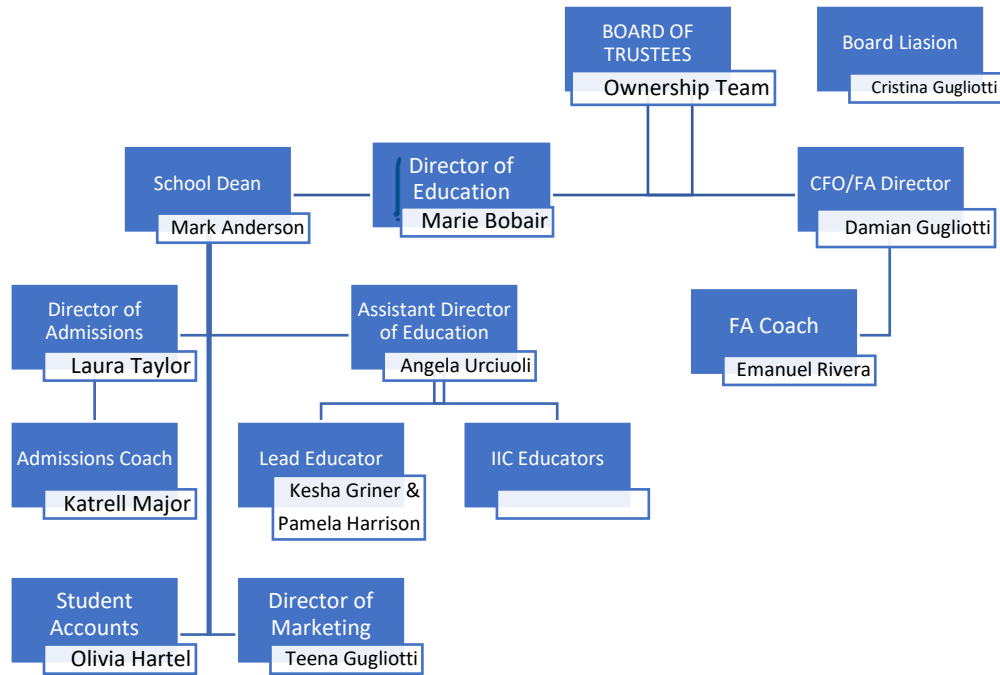
STUDENT ACCOUNTS

- Oversee and ensure the entire student account tracking, from inputting charges to having students sign off on financial aid disbursements
- Post student transactions into FAME Software
- Make students aware of all transactions made to their account
- Assist the Financial Aid department with filing paperwork
- Report directly to the School Dean

SOCIAL MEDIA ASSOCIATE

- Capture and schedule social media content to post

- Interact with followers, students and alumni
- Post regularly on social media channels
- Learn and implement principles of advertising on Facebook/IG, Adwords, YouTube & SEO
- Create/oversee general graphic development for use in apparel, information material, etc.
- Report directly to the Director of Marketing and Branding



EMPLOYEE EVALUATIONS

Employee evaluations occur periodically, usually annually. Evaluations consist of performance review based on the employee's expectations as well as their ability/willingness to follow all processes/procedures laid out both in this guide and instructed by their supervisor. Promotions, incentives, employment status, disciplinary actions and raises will depend on the employee's own ability to follow these processes, best practices and expectations.

CORRECTIVE ACTION POLICY

IIC expects its employees to meet performance expectations and to conduct themselves in accordance with its standards of conduct as well as other applicable policies and procedures. Employees who fail to meet performance expectations or engage in unacceptable conduct are subject to corrective action.

IIC does not adhere to any formal system of discipline, but considers various factors such as the gravity of the violation, the number of times a rule has been violated, the type of rules violated and the employee's overall performance when deciding how or when to issue corrective action.

Corrective action is considered as part of an employee's total performance. Therefore, continued infractions whether in one category or distinct and multiple categories, the employee's performance is viewed with all the infractions in mind. Where there are multiple infractions within an immediate time frame, all of the infractions will be outlined into one single corrective action document.

The following progressive disciplinary process may be utilized to improve performance and address employee conduct issues:

- First offense – Verbal (documented)
- Second offense – First written reprimand
- Third offense – Final written reprimand
- Fourth offense – Termination

While the use of progressive disciplinary steps is recommended, it is not required, and the School reserves the right to take any corrective action it deems appropriate based on the facts and circumstances of each case.

Corrective actions will remain in an employee's personnel file, but will expire after twelve (12) months and no longer be considered when evaluating overall performance with the exception of egregious or willful misconduct that resulted in a corrective action.

This policy is not intended to, should not be construed to and does not create a term of employment. Further, it does not limit or modify the School's right to terminate your employment or to alter the terms and conditions of your employment, at any time and for any reason, with or without cause. The School may, of course, terminate employment without following the progressive discipline steps outlined above whenever it determines that such action is warranted. Severe misconduct does not require progressive discipline, and is grounds for immediate termination. Examples of severe misconduct are found in the School's Workplace Conduct Policy. All employees are expected to meet our standards of performance, professionalism, and conduct, and to follow our work rules. Any improper conduct or violation of work rules may warrant disciplinary action, up to and including termination.

DISCIPLINARY ACTIONS

Disciplinary action at IIC is intended to fairly and impartially correct behavior and performance problems early on and to prevent reoccurrence. Disciplinary action may involve any of the following: verbal warning, written warning, suspension with or without pay, and termination of employment, depending on the severity of the problem and the frequency of occurrence. IIC reserves the right to administer disciplinary action at its discretion and based upon the circumstances.

IIC recognizes that certain types of employee behavior are serious enough to justify termination of employment, without observing other disciplinary action first. These violations include but are not limited to:

- Workplace violence
- Inappropriate relationship with a student
- Harassment
- Theft of any kind
- Insubordinate behavior
- Vandalism or destruction of school property
- Presence on school property during non-business hours
- Use of school equipment and/or school vehicles without prior authorization
- Indiscretion regarding personal work history, skills, or training
- Divulging IIC business practices or any other confidential information
- Any misrepresentation of IIC to a customer, a prospective customer, student, the general public, or an employee

INCENTIVES

For those employees who do consistently follow the processes, best practices, and expectations in this guide; incentives will be given periodically as a token of validation and appreciation. These incentives are given at the discretion of the school administration and may include bonuses, gift cards, additional vacation time and/or other gifts. Additional vacation days are applied to current year and do not carry over to following year. (Gifts, incentives, bonuses and the like are not based on student enrollment).

EMPLOYEE CONDUCT

STANDARDS OF CONDUCT

IIC endeavors to maintain a positive work environment, and every employee plays a role in fostering this environment. Accordingly, all employees are expected to abide by certain standards of conduct, based on honesty, common sense and professionalism. The rules set forth below are intended to establish standard expectations for employee conduct and performance, but are not intended to be exhaustive. Employees should be aware that unacceptable or inappropriate conduct, even if not specifically listed below, may result in disciplinary action, up to and including termination, at the School's sole discretion.

Employees may be disciplined and/or terminated for unacceptable or inappropriate conduct, including but not limited to the following:

- Obtaining employment on the basis of false or misleading information; falsifying employment documents or work records, including completing another employee's time record
- Theft or unauthorized taking or removal of School property or the property of another employee, student and/or client
- Falsifying student records, grades, transcripts hours or attendance.
- Breach of confidence, including disclosure, misappropriation or misuse of confidential information
- Violation of safety rules and/or policies, including failure to report any unsafe condition, damage to equipment or a job-related injury
- Fighting, threatening, bullying or disrupting the work of others
- Insubordination or derogatory behavior toward supervisory, management personnel, students and/or clients
- Poor work performance, exhibiting carelessness or negligence in the performance of your job
- Violation of the School's punctuality and attendance standards, including but not limited to irregular attendance, habitual lateness or unexcused absences
- Illegal gambling on School property
- Willful destruction or careless usage or damage to School assets or to the equipment or possessions of a student or another employee
- Unauthorized use or wasting of School supplies, resources and other work materials
- Excessive use of work time to engage in conduct of a personal or social nature, or other conduct that detracts from the employee's performance of their job duties
- Having a personal relationship either romantically or intimately with any student
- Carrying or possessing a weapon such as a gun, dangerous devices or other weapons on or around School premises, including parking lots
- Participation in a business in competition with the School, pursuant to applicable law
- Use, possession or sale of unlawful drugs or alcohol while on School premises, while on duty, or reporting to work under the influence of alcohol or any unlawful drugs
- Sleeping or malingering on the job
- Violation of a confidentiality agreement that exists between School and any employee, students and/or clients

- Violation of any School policy on harassment, discrimination and/or retaliation
- Any other violation of School policies, which are subject to change from time to time, at the School's sole discretion
- Excessive absence/tardiness

The School reserves the right to impose whatever discipline it chooses, or none at all, if and when a violation of this policy occurs. The School will deal with each situation individually and nothing in this policy shall be construed as a promise of specific treatment in a given situation.

Observance of these rules will help to ensure that our workplace remains a safe and desirable place to work, and all employees are expected to observe this policy as outlined above, at all times.

Unauthorized use of telephones, computers, or other electronic devices on working time. Working time does *not* include break periods, meal times, or other specified periods during the workday when employees are not engaged in performing their work tasks.

Unauthorized disclosure of any "business secrets" or other confidential or non-public proprietary information relating to the School's products, services, customers, students or processes.

This policy is not intended to restrict an employee's right to discuss, or act together to improve, wages, benefits and working conditions with co-workers or in any way restrict employees' rights under the National Labor Relations Act.

Other forms of misconduct not listed above may also result in disciplinary action, up to and including termination of employment. If you have questions regarding IIC's standards of conduct, please direct them to your supervisor or the School Dean.

CODE OF CONDUCT

Employees should:

- Uphold the reputation and standing of the profession
- Take all reasonable steps in relation to the care of students under their supervision, so as to ensure their safety and welfare
- Not be involved in a romantic relationship with students
- Work within the framework of relevant legislation and regulations
- Comply with policies, procedures and guidelines that aim to promote student education and welfare
- Treat all students and school staff equally regardless of age, gender, race, ethnicity, national origin, religion, disability, or sexual orientation
- Report, where appropriate, incidents or matters that impact student welfare
- Communicate effectively with students, colleagues, parents, school management and others in the school community in a manner that is professional, collaborative and supportive, and based on trust and respect
- Ensure any communication with students, colleagues, parents, school management and others is appropriate, including communication via electronic media, such as email, texting and social networking
- Not conduct any business or exchange of money with students

- Not request students to perform personal errands unrelated to the studies
- Ensure that they do not knowingly access, download or otherwise have in their possession while engaged in school activities, inappropriate materials/images in electronic or other format
- Ensure that they do not knowingly access, download or otherwise have in their possession, illicit materials/images in electronic or other format
- Ensure they do not practice while under influence of any substance that impairs fitness to teach

CONFIDENTIALITY

IIC takes the protection of Confidential Information very seriously. "Confidential Information" includes, but is not limited to, computer processes, computer programs and codes, customer lists, customer preferences, personal information, school financial data, marketing strategies, proprietary production processes, research and development strategies, pricing information, business and marketing plans, vendor information, software, databases, and information concerning the creation, acquisition or disposition of products and services.

Confidential Information also includes the School's intellectual property and information that is not otherwise public. Intellectual property includes, but is not limited to, trade secrets, ideas, discoveries, writings, trademarks, and inventions developed through the course of your employment with IIC and as a direct result of your job responsibilities.

To protect such information, employees may not disclose any confidential or non-public proprietary information about the School to any unauthorized individual. If you receive a request for Confidential Information, you should immediately refer the request to your supervisor.

The unauthorized disclosure of Confidential Information belonging to the School, and not otherwise available to persons or companies outside of IIC, may result in disciplinary action, up to and including termination of employment. If you leave the School, you may not disclose or misuse any Confidential Information. This policy is not intended to restrict an employee's right to discuss, or act together to improve, wages, benefits and working conditions with co-workers or in any way restrict employees' rights under the National Labor Relations Act.

Please see separate Non-Compete & Non-Solicit Agreement

NON-COMPETE

As a condition of your employment with the School, and in exchange for Your employment by the School, and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, You and the School hereby agree as follows:

Due to the School's legitimate business interest as described in this Agreement, and the good and valuable consideration offered to Employee, during the term of Employee's employment with the School and for a period of one (1) year thereafter (the "Restricted Period") to run consecutively, beginning on the last day of the Employee's employment with the Employer, whether terminated for any reason or no reason, by the Employee or the Employer, the Employee agrees and covenants not to, directly or indirectly, whether as an employee, officer, director, consultant owner, manager, advisor, investor, or otherwise, engage in Prohibited Activity within a 10 mile radius from the main office located in Wethersfield, CT of which the School conducts business or has customers ("Restricted Territory"):

(i) render advice or services to, or otherwise assist, any person, association, or entity who is engaged

directly or indirectly in the Restricted Business; (ii) hold a 5% or greater equity, voting, or profit participation interest in any person, association, or entity who is engaged, directly or indirectly, in the Restricted Business; or (iii) carry on or be in any way engaged, concerned or interested in or have business dealings with the Restricted Business.

For purposes of this section, “Prohibited Activity” is activity in which the Employee contributes the Employee's knowledge, directly or indirectly, in whole or in part, as an employee, educator/instructor employer, owner, operator, manager, advisor, consultant, contractor, agent, partner, director, stockholder, officer, volunteer, intern, or any other similar capacity to an entity engaged in the same or similar business as the Employer, including those engaged in the Restricted Business within the Restricted Territory. “Prohibited Activity” also includes activity that may require or inevitably require disclosure of educational content, learning path, practical/rubric assignment, systemic curriculum flow, lesson plans or any other educational related activity, proprietary information, or Confidential Information. “Restricted Business” means the business of researching, developing, manufacturing, distributing, selling, supplying or otherwise dealing with Restricted Products. “Restricted Products” means products or services which are of the same or materially similar kind as the products or services (including, but not limited to technical and product support, professional services, technical advice and other customer services) researched into, developed, manufactured, distributed, sold or supplied by the School and with which Employee was directly connected during employment with the School’s predecessor (including if applicable any period of employment with the School’s predecessor), or about which Employee has received or developed proprietary information by reason of Employee’s employment with the School or its predecessor. Notwithstanding the foregoing, with prior or written consent from the School, which the School may not unreasonably withhold, Employee may accept employment or otherwise be engaged in or involved with a competitor of the School that has multiple lines of business provided that, during the Restricted Period, Employee is employed by a business unit of such competitor that is not engaged or otherwise involved with the Restricted Business.

This Section does not, in any way, restrict or impede the Employee from exercising protected rights to the extent that such rights cannot be waived by agreement or from complying with any applicable law or regulation or a valid order of a court of competent jurisdiction or an authorized government agency, provided that such compliance does not exceed that required by law, regulation, or order.

Please see separate Non-Compete & Non-Solicit Agreement.

PERSONAL APPEARANCE

Dress, grooming and personal cleanliness standards contribute to the morale of all employees and affect the business image IIC presents to customers and visitors.

During business hours or when representing IIC, an employee is expected to present a clean, neat and tasteful appearance. Employees should dress and groom oneself according to the requirements of their position and accepted social standards. This is particularly true if an employee’s job involves interacting with customers, students or visitors in person.

If it is determined by a member of management that an employee’s personal appearance is inappropriate, the employee may be asked to leave the workplace until properly dressed or groomed. Under such circumstances, an employee will not be compensated for the time away from work. Consult your school supervisor if you have questions as to what constitutes appropriate appearance. When necessary, reasonable accommodations may be made to a person with a disability.

Dress Code

Without unduly restricting individual tastes, the following personal appearance guidelines should be followed.

Office Staff

- Smart casual attire is a professional dress option that incorporates trendy pieces into an outfit to achieve a clean yet comfortable, semi-formal appearance. Options include skirts, dresses, trousers, slacks, dark-colored jeans (with no rips or tears) sweaters, collared shirts or blouses, and possibly a blazer or a jacket depending on the occasion.
- Solid colored closed toed shoes

Educators (Educators/Director and Assistant Director of Education)

- Outer most layer must be an IIC Smock
- No jeans
- Solid colored closed toed shoes

If management designates "casual days," an employee's casual dress must still be clean, neat and project a professional image.

Generally, employees should wear appropriate clothing, observe high standards of personal hygiene, and dress and groom themselves according to the requirements of their positions. Employees should maintain a clean and neat appearance and should refrain from wearing stained, wrinkled, frayed, or revealing clothing to the workplace. Employees are urged to use their discretion when determining what is appropriate to wear to work. Employees who wear inappropriate attire to work may be sent home to change their clothing.

IIC understands that in certain situations, the School may need to make exceptions to this policy based on an employee's religion, disability, or other characteristic protected under federal, state or local law. In accordance with all applicable laws, the School will make every effort to provide reasonable accommodation as necessary unless doing so would cause an undue hardship on IIC.

LICENSE MAINTANENCE

Employees who hold positions that require professional or occupational licenses to practice, must maintain those licenses in an active status. Licenses must be renewed thirty (30) days before the expiration date. Employees who permit their required license to expire may be suspended and/or have their employment terminated until such time as their licenses are once again active.

Responsibilities

- Employees are responsible for renewing professional/occupational licenses and/or certifications in a timely manner
- Employees are responsible for keeping their licenses in active and good standing
- Employees are responsible for all costs and fees associated with license renewals

Any employee who lets their professional or occupational license lapse will not be eligible for employment and will be grounds for immediate separation from the Company.

STAFF MEETINGS

IIC staff meetings are held periodically but at least once annually. All regular educators are expected to attend except in cases of emergency or illness. Meetings are to cover a variety of topics related to mission statement, curriculum, attendance, changes, admissions, accreditation material, etc.

TELEPHONE USAGE

IIC telephones are intended for the sole use of conducting school business. Personal use of the School's telephones and individually owned cell phones during class hours is prohibited except in emergencies.

Any employee found in violation of this policy will be subject to disciplinary action, up to and including termination of employment.

PERSONAL PROPERTY

Employees should use their discretion when bringing personal property into the workplace. IIC assumes no risk for any loss or damage to personal property. Additionally, employees may not possess or display any property that may be viewed as inappropriate or offensive on IIC premises.

USE OF SCHOOL PROPERTY

School property refers to anything owned by the school: physical, electronic, intellectual, or otherwise. The use of school property is for business necessity only.

When materials or equipment are assigned to an employee for business, it is the employee's responsibility to see that the equipment is used properly and cared for properly. However, at all times, equipment assigned to the employee remains the property of the School, and is subject to reassignment and/or use by the School without prior notice or approval of the employee. This includes, but is not limited to, computer equipment and data stored thereon, voicemail, records, and employee files.

IIC has created specific guidelines regarding the use of school equipment. Below is a list of employee responsibilities and limitations with regards to school property.

Removal of school property

School property is not permitted to be taken from the premises without proper written authority from school management.

Care of School Property

Office areas should be kept neat and orderly and all equipment should be well-maintained. The theft, misappropriation, or unauthorized removal, possession, or use of school property or equipment is expressly prohibited. Any action in contradiction to the guidelines set herein may result in disciplinary action, up to and including termination of employment.

IPads®

IPads® are the property of the school and furnished to educators for use of instruction and class engagement. Each employee is, in turn, responsible for the IPads®. IPads® damaged or stolen as a result of an employee's negligence will, be charged to the employee. All IPads® must be returned upon termination of employment.

PURCHASES

Only authorized persons may purchase supplies in the name of IIC. No employee whose regular duties do not include purchasing shall incur any expense on behalf of IIC or bind IIC by any promise or representation without express written approval.

SMOKING

IIC provides a smoke-free environment for its employees, customers, students and visitors. Smoking, vaping or any kind of e-cigarette is prohibited throughout the workplace with the exception of designated smoking areas. All employees must wash hands and cleanse breath before returning to work after smoking.

WORKPLACE SAFETY

IIC is committed to providing a clean, safe, and healthful work environment for its employees. Maintaining a safe work environment, however, requires the continuous cooperation of all employees. IIC and all employees must comply with all occupational safety and health standards and regulations established by the Occupational Safety and Health Act and state and local regulations. In addition, all employees are expected to obey safety rules and exercise caution and common sense in all work activities.

HEALTH AND SAFETY POLICY

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

Periodically, IIC may issue rules and guidelines governing workplace safety and health. IIC may also issue rules and guidelines regarding the handling and disposal of hazardous substances and waste. All employees should familiarize themselves with these rules and guidelines, as strict compliance will be expected.

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

COMPLAINT AND REPORTING PROCEDURE

Employees should immediately report any unsafe conditions to their supervisor without fear of reprisal. In the case of an accident that results in injury, regardless of how seemingly insignificant the injury may appear, employees must notify their supervisor. If you believe it would be inappropriate to report the matter to your supervisor, you can report it directly to:

Mark Anderson
Marka@studyhair.com | (860) 882-3085

Employees who violate safety standards, cause hazardous or dangerous situations, or fail to report or, where appropriate, remedy such situations may be subject to disciplinary action, up to and including termination of employment.

Retaliation Prohibited: IIC expressly prohibits retaliation against anyone who reports unsafe working conditions or work-related accidents, injuries or illnesses. Any form of retaliation will be subject to disciplinary action, up to and including termination of employment.

ANTI-RETALIATION AND WHISTLEBLOWER POLICY

IIC is committed to operating in compliance with all applicable laws, rules and regulations, including those concerning accounting and auditing, and prohibits fraudulent practices by IIC or its employees. IIC is required, as is its employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. IIC, as well as its employees, must practice honesty and integrity in fulfilling school responsibilities and complying all applicable laws and regulations. This policy applies to any matter which is related to IIC's business and does not relate to private acts of an individual not connected to the business of IIC.

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that IIC can address and correct inappropriate conduct and actions. It is the responsibility of all employees, regardless of position, to report concerns about violations of IIC's code of ethics or suspected violations of law or regulations that govern IIC's operations.

IIC will not retaliate against an employee in the terms and conditions of employment because that employee: (a) reports to a supervisor, another member of management, or to a federal, state or local agency what the employee believes in good faith to be a violation of the law; or (b) participates in good faith in any resulting investigation or proceeding, or (c) exercises their rights under any state or federal law(s) or regulation(s) to pursue a claim or take legal action to protect the employee's rights.

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

IIC has an open-door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you may contact IIC Ownership. Managers and supervisors are required to report complaints or concerns about suspected ethical and legal violations in writing to the IIC's School Dean, Mark Anderson, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the School Dean.

IIC's School Dean is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. School Dean will advise the Ownership Team of all complaints and their resolution on compliance activity relating to accounting or alleged financial improprieties. School Dean shall immediately notify any outside regulatory agencies in the school catalogue of any concerns or complaint regarding IIC's accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. All reported violations will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

EMPLOYEE GRIEVANCES

It is the policy of IIC to maintain a harmonious workplace environment. IIC encourages its employees to express concerns about work-related issues, including workplace communication, interpersonal conflict, and other working conditions. Employees are encouraged to raise concerns with their supervisors. If not resolved at this level, an employee may submit, in writing, a signed grievance to the School Dean.

After receiving a written grievance, IIC may hold a meeting with the employee, the immediate supervisor, and any other individuals who may assist in the investigation or resolution of the issue. All discussions related to the grievance will be limited to those involved with, and who can assist with, resolving the issue.

Complaints involving alleged discriminatory practices shall be processed in accordance with IIC's Sexual and other Unlawful Harassment Policy. IIC assures that all employees filing a grievance or complaint can do so without fear of retaliation or reprisal.

SECURITY

The purpose of IIC's security policy is to protect School assets and to maintain a safe working environment for all employees.

Facility Access

Employees with need to open/close IIC will be issued a key to gain access to the facilities. Employees who are issued keys are responsible for their safekeeping. All lost or stolen keys must be reported to your supervisor as soon as possible.

Upon separation from IIC, and at any other time upon IIC's request, all keys must be returned to your supervisor.

Closing Procedures

The last employee, or a designated employee, who leaves the office at the end of the business day assumes the responsibility to ensure that: all doors are securely locked; the alarm system is armed; thermostats are set on appropriate evening and/or weekend setting; and all appliances and lights are turned off with the exception of the lights normally left on for security purposes.

Employees are not permitted on school property after hours without prior written authorization from the School Dean.

DIVERSITY AND INCLUSION POLICY

IIC is committed to fostering, cultivating and preserving a culture of diversity and inclusion.

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

We embrace and encourage our employees' differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental

ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make our employees unique.

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

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

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

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

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

WORKPLACE VIOLENCE

IIC strictly prohibits workplace violence, including any act of intimidation, threat, harassment, physical violence, verbal abuse, aggression or coercion against a coworker, vendor, customer, or visitor.

Prohibited actions, include, but are not limited to the following examples:

- Physically injuring another person
- Threatening to injure another person
- Engaging in behavior that subjects another person to emotional distress
- Using obscene, abusive or threatening language or gestures
- Bringing an unauthorized firearm or other weapon onto school property
- Threatening to use or using a weapon while on school premises, on school-related business, or during job-related functions
- Intentionally damaging property

All threats or acts of violence should be reported immediately to your supervisor or security personnel. Employees should warn their supervisors or security personnel of any suspicious workplace activity that they observe or that appears problematic. Employee reports made pursuant to this policy will be kept confidential to the maximum extent possible. IIC will not tolerate any form of retaliation against any employee for making a report under this policy.

IIC will take prompt remedial action, up to and including immediate termination, against any employee found to have engaged in threatening behavior or acts of violence.

DRUG & ALCOHOL USE

IIC is committed to maintaining a workplace free of substance abuse. No employee is allowed to consume, possess, sell, purchase, or be under the influence of alcohol or illegal drugs, as defined by federal law, on any property owned by or leased on behalf of the School, or in any vehicle owned or leased on behalf of the School.

The use of over-the-counter drugs and legally prescribed drugs is permitted as long as they are used in the manner for which they were prescribed and provided that such use does not hinder an employee's ability to safely perform their job. Employees should inform their supervisor if they believe their medication will impair their job performance, safety or the safety of others, or if they believe they need a reasonable accommodation when using such medication.

IIC will not tolerate employees who report for duty while impaired by the use of alcohol or drugs. All employees should report evidence of alcohol or drug abuse to their supervisor or the School Dean immediately. In cases in which the use of alcohol or drugs creates an imminent threat to the safety of persons or property, employees are required to report the violation. Failure to do so may result in disciplinary action, up to and including termination of employment.

As a part of our effort to maintain a workplace free of substance abuse, employees may be asked to submit to a medical examination and/or clinical testing for the presence of alcohol and/or drugs. Within the limits of federal, state, and local laws, reserves the right to examine and test for drugs and alcohol at the School's discretion.

As a condition of your employment with IIC, employees must comply with this Drug & Alcohol Use Policy. Be advised that no part of the Drug & Alcohol Use Policy shall be construed to alter or amend the at-will employment relationship between IIC and its employees. Employees found in violation of this policy may be subject to disciplinary action, up to and including termination of employment.

VISITORS IN THE WORKPLACE

To ensure the safety and security of IIC and its employees, only authorized visitors are permitted on School premises and in School facilities.

COMPUTER, EMAIL & INTERNET USAGE

Computers, email, and the Internet allow IIC employees to be more productive. However, it is important that all employees use good business judgment when using IIC's electronic communications systems (ECS).

STANDARDS OF CONDUCT AND ECS

IIC strives to maintain a workplace free of discrimination and harassment. Therefore, IIC prohibits the use of the School's ECS for bullying, harassing, discriminating, or engaging in other unlawful misconduct, in violation of the School's policy against discrimination and harassment.

COPYRIGHT AND OTHER INTELLECTUAL PROPERTY

Respect all copyright and other intellectual property laws. For the School's protection as well as your own, it is critical that you show proper respect for the laws governing copyright, fair use of copyrighted material owned by others, trademarks and other intellectual property, including the School's own copyrights, trademarks and brands. Employees are also responsible for ensuring that, when sending any material over the Internet, they have the appropriate distribution rights.

IIC purchases and licenses the use of various computer software for business purposes and does not own the copyright to this software or its related documentation. Unless authorized by the software developer, IIC does not have the right to reproduce such software for use on more than one computer. Employees may only use software according to the software license agreement. IIC prohibits the illegal duplication of software and its related documentation.

ECS GUIDELINES

The following behaviors are examples of previously stated or additional actions and activities under this policy that are prohibited:

- IIC's policies prohibiting harassment, in their entirety, apply to the use of IIC's communication and computer systems. No one may use any communication or computer system in a manner that may be construed by others as harassing or offensive based on race, national origin, sex, sexual orientation, age, disability, religious beliefs or any other characteristic protected by federal, state or local law
- Sending or posting discriminatory, harassing, or threatening messages or images about coworkers, supervisors or the School that violate the School's policy against discrimination and harassment
- No employee may access, or attempt to obtain access to, another employee's computer systems without appropriate authorization
- Communication and computer systems are intended for business use, all employees, upon request, must inform management of any private access codes or passwords. Unauthorized duplication of copyrighted computer software violates the law and is strictly prohibited
- Stealing, using, or disclosing someone else's code or password without authorization
- Pirating or downloading School-owned software without permission

- Sending or posting the School's confidential material, trade secrets, or non-public proprietary information outside of the School. *Wages and other conditions of employment are not considered confidential material*
- Violating copyright laws and failing to observe licensing agreements
- Participating in the viewing or exchange of pornography or obscene materials
- Sending or posting messages that threaten, intimidate, coerce, or otherwise interfere with the job performance of fellow employees
- Attempting to break into the computer system of another organization or person.
- Refusing to cooperate with a security investigation
- Using the Internet for gambling or any illegal activities
- Sending or posting messages that disparage another organization's products or services
- Passing off personal views as representing those of IIC

PRIVACY AND MONITORING

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

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

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

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

This policy is not intended to restrict an employee's right to discuss, or act together to improve, wages, benefits and working conditions with co-workers or in any way restrict employees' rights under the National Labor Relations Act.

Violations of this policy may result in disciplinary action, up to and including termination of employment. Questions or concerns related this policy should be directed to your supervisor or the School Dean.

SOCIAL NETWORKING, POSTING AND BLOGGING POLICY

IIC acknowledges the popularity of social media sites, blogs, chat rooms, personal websites, and other internet communications as a means for sharing experiences, ideas, and opinions. However, because of legal and other ramifications that may stem from the use of interactive websites, IIC has adopted the following policy regarding internet communications both during working and non-working time.

Interactive Internet Communications

This policy covers employees creating, posting, commenting or uploading to any internet website, including but not limited to blogs, media sites, chat rooms, bulletin boards, newsgroups, video and picture sharing sites, social networking sites (e.g., Facebook, X, Instagram, SnapChat, etc.), personal websites, and discussion forums, whether or not such sites are set to private. Employees are free to create or participate in interactive internet communications provided that such participation does not violate any of IIC's policies and does not interfere with an employee's regular work duties. The provisions of the School's "Use of Communications and Computer Systems" policy, including but not limited to the School's right of monitoring, apply with equal force to employee access and use of blogging and other interactive internet communications.

Blogging During Work Hours

Incidental personal use of the School's technology resources for blogging and participating in other forms of interactive internet communication is permitted so long as it does not interfere with job performance and is otherwise in compliance with this policy. If an employee's job is affected adversely by such activities, the employee may be subject to disciplinary action, up to and including immediate termination.

Blogging Requirements

Employees must comply with the following requirements when blogging during working or non-working time: If an employee's posts or communications on social media sites mention IIC, its employees, clients, practices, methodologies, pricing and services it provides, the employee must make clear that the views posted are that of the employee and may not represent the views of the School.

Employees also may not issue IIC's behalf any publicity or public statements regarding the School, its clients, practices, methodologies, pricing and services or anything else relating to the school's business practices. It is imperative that IIC be responsible for all official external communication to deliver appropriate messages on behalf of the School.

Employees may not disclose trade secrets or confidential business information concerning School, its clients, practices, methodologies and services or anything else relating to pricing, marketing strategies, communications, etc. belonging to the School or any companies and their employees with which School conducts business, including through blogs and other internet postings. In addition, employees must not disclose certain IIC financial information in violation of securities laws or regulations.

Employees may not post malicious, obscene, abusive or unlawful comments, or comments that might constitute harassment or bullying, regarding the School, its clients or any school and their employees with which IIC conducts business. Examples of such conduct might include offensive posts that could contribute to a hostile work environment on the basis of race, sex, gender identity, disability, religion or any other status protected by law.

Employees should never maliciously post any information or rumors that they know to be false about IIC, its clients and any companies and their employees with which the School conducts business.

Employees wishing to post blogs or other public internet communications should be aware that copyright and trademark law may restrict the use and copying of material belonging to IIC and others. Employees may not violate the intellectual property rights of others.

All blogging and other internet activity, regardless of whether it is done on non-working time, is subject to IIC's policies, including but not limited to the School's policies titled "Use of Communications and Computer Systems," "Equal Employment Opportunity," and "Anti-Harassment and Complaint Procedure." If conduct is in violation of these policies, IIC may request that the offensive posting be removed.

Nothing in this policy should be interpreted to prohibit employees from collectively discussing or taking legally protected action with regard to the terms and conditions of their employment or from discussing their wages or working conditions.

CREDIT & DEBIT CARD PROCESSING POLICY

Most of IIC's (the "School") sales are done through credit/debit card transactions as a convenience to our customers, and the School is committed to providing a secure credit and debit card processing environment for our customers to protect against loss and fraud. At the same time, the School is committed to ensuring that credit/debit card transactions are done diligently as proper credit/debit card transactions support the success of the School and its business operations.

This policy applies to all employees who process credit/debit card transactions on behalf of the School for any training and/or services a customer purchases.

Policy

It is the policy of the School to accept cardholder data in person, or by telephone; it is imperative that an employee never accepts credit card information via text message or email. All payments made for training and/or services via credit card must be processed through the School's secure credit card terminal or POS software. Access to cardholder information should be limited to only those individuals whose job requires such access.

Procedure

Accepted Credit Cards. The School accepts the following credit cards: Visa, MasterCard, Discover and Debit cards.

Face-to-Face Transactions: All face-to-face transactions should have the payment card present and employees must obtain the customer's signature. It is important to always verify that the card is valid and signed. Compare signatures and check for ID where possible and feasible.

Over the Phone Transactions: When payment is taken over the phone, the card and transaction information must be immediately entered by an employee with the customer remaining on the line after having given his/her credit card information.

Transmitting the Data. The credit card data is transmitted for approval as the terminal, POS system or secure payment gateway is connected to the processing network.

Approve or Decline: Once the data is transmitted, the credit card issuer can approve or decline the transaction. This is based on the validity of the card, the transaction, as well as the cardholder's available funds. When a card is declined, employees must politely inform the customer that their card is not processing and ask if they have any other credit card available to complete the transaction. Unless the customer can provide a card that is accepted, the transaction cannot be completed.

Responding: If the transaction is approved, the processor and the School should receive an authorization response.

Completing the Transaction: Once the authorization response is received, this indicates the transaction is complete. If the customer is in person, the customer should be asked if they would like a receipt emailed, texted, or if they do not want a receipt. Customers who make a purchase over the phone should be asked if they would like a receipt mailed or emailed.

Refunds

When training or a service is purchased using a credit or debit card and a refund is necessary, the refund must be credited back to the account that was originally charged. Refunds in excess of the original sale amount or cash refunds are prohibited.

Maintaining Credit Card Information

Under no circumstances should cardholder data be maintained in any format.

All documentation containing cardholder data must be destroyed in a manner that will render them unreadable (cross-cut shredded) after the payment has been processed.

Any questions regarding this policy should be directed to your supervisor.

PERSONAL IDENTITY INFORMATION & CONFIDENTIALITY POLICY

IIC recognizes its need to maintain the confidentiality of Personal Identity Information (PII) and understands that such information is unique to each individual. The PII covered by this policy may come from various types of individuals like employees, vendors, and customers. The scope of this policy includes school requirements for the security and protection of such information throughout the school and its approved vendors both on and off work premises.

Key Elements

Personal Identity Information (PII): Unique personal identification numbers or data, including:

- Social Security Numbers (or their equivalent issued by governmental entities outside the United States).
- Taxpayer Identification Numbers (or their equivalent issued by governmental revenue entities outside the United States).
- Employer Identification Numbers (or their equivalent issued by government entities outside the United States).
- State or foreign driver's license numbers.
- Personal addresses
- Date(s) of birth.
- Corporate or individually held credit or debit transaction card numbers (including PIN or access numbers) maintained in organizational or approved vendor records.

PII may reside in hard copy or electronic records; both forms of PII fall within the scope of this policy.

Vendors: Vendors include all external providers of services to the school and include proposed vendors. No PII information can be transmitted to any vendor in any method unless the vendor has been approved for the receipt of such information.

PII Retention: IIC understands the importance of minimizing the amount of PII data it maintains and retains such PII only as long as necessary. Refer to the school's Record Retention Policy, which dictates the length of data retention and data destruction methods for both hard copy and electronic records.

Data Breaches/Notification: The School will handle breach notifications(s) to all governmental agencies to whom such notice must be provided in accordance with time frames specified under these laws. Notices to affected individuals will be communicated by the owner after consultation with the School's attorney and within the time frame specified under the appropriate law(s).

Data Access: IIC has access to systems where PII data may reside; thus, user access to such systems must be limited to only those who are granted access by management.

Regulatory Requirements: It is the policy of the school to comply with any international, federal or state statute and reporting regulations. If any provision of this policy conflicts with a statutory requirement of international, federal or state law governing PII, the policy provision(s) that conflict shall be superseded.

Confirmation of Confidentiality: All school employees must maintain the confidentiality of PII as well as school proprietary data to which they may have access and understand that such PII is to be restricted to only those with a business need to know.

The School cannot control the information it receives from outside vendors or customers. However, all information transmissions sent by employees with PII must be encrypted.

Violations of PII Policies and Procedures: IIC views the protection of PII data to be of the utmost importance. Infractions of this policy or its procedures will result in disciplinary actions and may include suspension or separation in the case of severe or repeat violations.

SEXUAL & OTHER UNLAWFUL HARASSMENT

NON- HARASSMENT POLICY

It is IIC's policy to prohibit intentional and unintentional harassment of any individual by another person on the basis of any protected classification including, but not limited to, race, color, national origin, disability, religion, marital status, veteran status, sex (including pregnancy, gender identity, and sexual orientation), or age. The purpose of this policy is not to regulate our employees' personal morality, but to ensure that in the workplace, no one harasses another individual.

If the employee feels that they has been subjected to conduct which violates this policy, they should immediately report the matter to their direct supervisor. If the employee is unable for any reason to contact this person, or if the employee has not received a satisfactory response within five (5) business days after reporting any incident of what the employee perceives to be harassment, the employee should contact IIC Ownership. If the person toward whom the complaint is directed is one of the individuals indicated above, the employee should contact any higher-level manager in their reporting hierarchy. Every report of perceived harassment will be fully investigated and corrective action will be taken where appropriate. All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed. In addition, IIC will not allow any form of retaliation against individuals who report unwelcome conduct to management or who cooperate in the investigations of such reports in accordance with this policy. If the employee feels that they has been subjected to any such retaliation, they should report it in the same manner in which the employee would report a claim of perceived harassment under this policy. Violation of this policy including any improper retaliatory conduct will result in disciplinary action, up to and including discharge. All employees must cooperate with all investigations.

SEXUAL HARASSMENT POLICY

It is IIC's policy to prohibit harassment of any employee by any supervisor, employee, customer or vendor on the basis of sex or gender. The purpose of this policy is not to regulate personal morality within IIC. It is to ensure that at IIC all employees are free from sexual harassment. While it is not easy to define precisely what types of conduct could constitute sexual harassment, examples of prohibited behavior include unwelcome sexual advances, requests for sexual favors, obscene gestures, displaying sexually graphic magazines, calendars or posters, sending sexually explicit e-mails, text messages and other verbal or physical conduct of a sexual nature, such as uninvited touching of a sexual nature or sexually related comments. Depending upon the circumstances, improper conduct also can include sexual joking, vulgar or offensive conversation or jokes, commenting about the employee's physical appearance, conversation about one's own or someone else's sex life, or teasing or other conduct directed toward a person because of their gender which is sufficiently severe or pervasive to create an unprofessional and hostile working environment.

If the employees feel they have been subjected to conduct which violates this policy, they should immediately report the matter to their direct supervisor. If unable for any reason to contact this person, or if the employee has not received a satisfactory response within five (5) business days after reporting any incident of perceived harassment, the employee should contact IIC Ownership. If the person toward whom the complaint is directed is one of the individuals indicated above, the employee should contact any higher-level manager in their reporting hierarchy. Every report of perceived harassment will be fully investigated and corrective action will be taken where appropriate. All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed. In

addition, IIC will not allow any form of retaliation against individuals who report unwelcome conduct to management or who cooperate in the investigations of such reports in accordance with this policy. If the employees feel they have been subjected to any such retaliation, they should report it in the same manner in which a claim of perceived harassment would be reported under this policy.

Violation of this policy including any improper retaliatory conduct will result in disciplinary action, up to and including discharge. All employees must cooperate with all investigations.

Complaint Process

- a) Employee who believes that they have been the victim of sexual harassment should report the alleged act immediately by bringing the matter to the attention of anyone who is in a supervisory or management position that you feel comfortable talking to.
- b) It is then the responsibility of the higher management to conduct a prompt and thorough investigation of all the circumstances surrounding the alleged incident of sexual harassment. If the investigation discloses that an employee has committed an act of sexual harassment, the employee shall be subject to appropriate disciplinary action, up to and including termination.

Management Responsibility:

- a) Supervisors are responsible for creating and maintaining a positive and productive work environment. Supervisors are required to:
 - Report all incidents to upper management and Human Resources immediately.
 - Take all steps possible to eliminate any harassment they become aware of.
 - Bring this policy to the attention of their subordinate supervisors and employees.
 - Initiate disciplinary action whenever it appears a violation of this policy may have occurred.
- b) IIC recognizes that some incidents may constitute purely personal or social conduct and may be neither discriminatory nor related in any way to employment. Distinguishing these personal non-employment related incidents from genuine sexual harassment may be a difficult task, which can be accomplished only after thorough factual investigation.
- c) Given the nature of this type of discrimination, IIC recognizes also that false accusations of sexual harassment can be made, can be difficult to refute, and can have serious effects on innocent individuals. Any employee who knowingly makes a false accusation of sexual harassment is also subject to disciplinary action, up to and including termination. We expect that all employees will act responsibly to establish a pleasant working environment free from discrimination.
- d) All current employees have been provided two hours of training and education in sexual harassment. All new employees must receive this training within six months of hiring. Training program as well as this policy can be found at www.studyhair.com/employee-resources
- e) This training includes information concerning sexual harassment and remedies available to victims of sexual harassment and conforms to the training requirements outlined in the regulations adopted by the Connecticut Commission on Human Rights and Opportunities.
- f) Any employee who believes that the action(s) of a fellow employee constitute unwelcome harassment has a responsibility to report, as soon as possible, to any supervisor.
- g) Complaints of harassment must be investigated promptly and in as impartial and confidential a manner as possible. If any employee is not satisfied with the handling of a

complaint or the action taken, then the employee should bring the complaint to the attention of the owner.

- h) In all cases, the employee is to be advised of the investigator's or the owner's findings and conclusions.
- i) Any employee, supervisor, or manager if found, after appropriate investigation, to have engaged in harassment of another employee will be subject to appropriate disciplinary action, depending on the circumstances, up to and including termination.
- j) Any employee who, after an appropriate investigation has been made, is found to have knowingly made a false accusation of sexual harassment will be subject to termination.
- k) Retaliation against any employee who makes a complaint in good faith or co-operates with an investigation is prohibited. Any employee found to have retaliated will be subject to disciplinary action, up to including termination.

TITLE IX POLICY

It is the policy of IIC to maintain an environment for students, faculty, School Deans, staff, and visitors that is free of all forms of discrimination and harassment, including sexual harassment. IIC has enacted the Sexual Harassment Policies & Grievance Procedures (the "Policy") to reflect and maintain its institutional values, to provide for fair and equitable procedures for determining when this Policy has been violated, and to provide recourse for individuals and the community in response to violations of this Policy.

The Policy can be found at the IIC's website at www.studyhair.com or obtained in person from the Title IX Coordinator (see below).

IIC does not discriminate on the basis of sex in its educational, extracurricular, or other programs or in the context of employment. Sex discrimination is prohibited by Title IX of the Education Amendments of 1972, a federal law that provides:

No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.

This Policy prohibits all forms of sex discrimination, harassment, and misconduct, including sexual assault, domestic violence, dating violence, and stalking. The requirement not to discriminate in IIC's education programs or activities extends to admission. This Policy also prohibits retaliation against a person who has made a report or complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing under this Policy. Inquiries about the application of Title IX may be referred to IIC's Title IX coordinator, the U.S. Department of Education Office for Civil Rights, or both.

IIC expressly prohibits any form of student or staff harassment based on race, color, religion, sex, national origin, ethnic origin, age, sexual orientation and identity, handicap or status as a military veteran in its programs and activities. The following person has been designated to handle inquiries regarding the non-discrimination policies, including Title IX:

Mark Anderson, Title IX Coordinator
School Dean
632 Silas Deane Hwy.
Wethersfield, CT 06109
65 Whiting Street,
Plainville, CT 06062
Phone: (860) 571-0330, ext. 120
Email: marka@studyhair.com

Inquiries or complaints concerning IIC's compliance with Title IX or other federal civil rights laws may be referred to the U.S. Department of Education's Office for Civil Rights.

Office for Civil Rights, Boston Office
U.S. Department of Education, 8th Floor
5 Post Office Square
Boston, MA 02109-3921
Telephone: (617) 289-0111
Facsimile: (617) 289-0150
Email: OCR.Boston@ed.gov

IIC desires to create and sustain an anti-discriminatory environment and will not tolerate discrimination of any kind. IIC will achieve this through education, orientation, and training for all students, staff, and faculty for the purpose of creating awareness of both the issues surrounding discrimination as well as accountability, sensitivity training, and anti-discrimination training in their classrooms, at least once while the student is in IIC.

Title IX Sexual Harassment Grievance Procedure

Reports of sexual harassment should be made to IIC's Title IX Coordinator. IIC will respond promptly when it has actual knowledge of sexual harassment in its education programs or activities. The Title IX Coordinator will promptly contact the complainant to discuss the availability of supportive measures, consider the complainant's wishes with respect to supportive measures, inform the complainant of the availability of supportive measures with or without the filing of a formal complaint, and explain to the complainant the process for filing a formal complaint.

IIC will investigate all formal complaints of sexual harassment. A formal complaint must be in writing, filed by a complainant or signed by the Title IX Coordinator alleging sexual harassment against a respondent, and request that IIC investigate the allegation of sexual harassment. A formal complaint form may be obtained from the Title IX Coordinator, although no particular form is required to submit a formal complaint so long as the complaint is in writing, signed by a complainant, alleges sexual harassment against a respondent, and requests an investigation. IIC's Title IX Coordinator oversees IIC's investigation, response to, and resolution of all reports of prohibited sexual harassment, and of related retaliation, involving students, faculty, and staff.

If all parties voluntarily agree to participate in an informal resolution that does not involve a full investigation and adjudication after receiving notice of a formal complaint and if IIC determines that the particular formal complaint is appropriate for such a process, IIC will facilitate an informal resolution to assist the parties in reaching a voluntary resolution. IIC retains the discretion to determine which cases are appropriate for voluntary resolution.

IIC will convene a hearing panel following the end of an investigation. The hearing panel determines whether the respondent is responsible or not responsible for a violation of the Policy. If the respondent is determined to be responsible, the hearing panel's written determination will include any disciplinary sanctions IIC imposes on the respondent. The Policy provides that the parties have the right to appeal the hearing panel's determination under certain circumstances.

Please refer to Annual Security Report

TIMEKEEPING & PAYROLL

ATTENDANCE POLICY

Absenteeism and tardiness place an undue burden on other employees and on the School. IIC expects regular attendance and punctuality from all employees. This means being in the workplace, ready to work, at your scheduled start time each day and completing your entire shift. Employees are also expected to return from scheduled meal and break periods on time.

All time off must be requested in writing, in advance, as outlined in the IIC's Paid Time Off (PTO) policy. If an employee is unexpectedly unable to report for work for any reason, they must directly notify their supervisor as early as possible, and preferably prior to their scheduled starting time. It is not acceptable to leave a voicemail message with a supervisor, except in extreme emergencies. In cases that warrant leaving a voicemail message or when an employee's direct supervisor is unavailable, a follow-up call must be made later that day.

If an illness or emergency occurs during work hours, employees should notify their supervisor as soon as possible.

If an employee fails to notify their supervisor after three consecutive days of absence, IIC will presume that the employee has voluntarily resigned. The School will review any extenuating circumstances that may have prevented them from calling in before the employee is removed from payroll.

Should undue or recurrent absence and tardiness become apparent, the employee will be subject to disciplinary action, up to and including termination of employment.

Corrective Action

Excessive absenteeism is defined as two (2) or more occurrences of unplanned absences or late arrivals in a thirty (30) day period and may result in corrective action. Three (3) occurrences of unexcused absences in a twelve (12) month period are considered grounds for termination.

Job Abandonment

Any employee who fails to report to work for a period of three (3) days (no call/no show) or more without properly notifying their supervisor will be considered to have abandoned their job and voluntarily terminated their employment with IIC.

TIMEKEEPING

It is the School's policy to comply with applicable laws that require records to be maintained of the hours worked by our employees. Every employee is responsible for accurately recording time worked.

In addition to recording arrival and departure time, non-exempt employees are required to accurately record the start and end of each meal period as well as any departure for non-work related reasons. IIC strictly prohibits non-exempt employees from working off the clock for any reason. All time spent working must be logged and accounted for; this includes time spent using electronic devices for work-related purposes. PTO and absences for jury duty, funeral leave or military training must be specifically recorded by all employees. It is the responsibility of all employees to submit and approve their time records each week.

Altering, falsifying, tampering with time records, or recording time on another employee's time record may result in disciplinary action up to and including termination of employment.

PAYDAYS

IIC employees are paid on a bi-weekly basis. In the event that a regularly scheduled payday falls on a holiday, employees will be paid on the day preceding the holiday, unless otherwise required by state law. Paychecks will not, under any circumstances, be given to any person other than the employee without written authorization. Paychecks may also be mailed to the employee's listed address or, upon advance written authorization, deposited directly into an employee's bank account. Employees who elect payment through direct deposit will receive an itemized statement of wages when the School makes direct deposits.

PAYROLL DEDUCTIONS

IIC makes deductions from employee pay only in circumstances permitted by applicable law. This includes, but is not limited to, mandatory deductions for income tax withholding and Social Security and Medicare contributions as well as voluntary deductions for health insurance premiums and other related contributions.

If you believe that an improper deduction has been made from your pay, raise the issue with the School Dean immediately. IIC will promptly investigate. If the investigation reveals that you were subjected to an improper deduction from pay, you will be reimbursed promptly.

EMPLOYEE HANDBOOK ACKNOWLEDGEMENT

(EMPLOYEE COPY)

I acknowledge that this employee handbook is neither a contract of employment nor a legal document. I have received the handbook, and I understand that it is my responsibility to read and comply with the policies contained in this handbook and any revisions made to it.

The employee handbook describes important information about IIC and I understand that I should consult my supervisor regarding any questions not answered in the handbook. I have entered into my employment relationship with IIC voluntarily and acknowledge that there is no specified length of employment. Accordingly, either IIC or I can terminate the relationship at will, with or without cause, at any time, so long as there is no violation of applicable federal or state law.

Since the information, policies and benefits described here are necessarily subject to change, I acknowledge that revisions to the handbook may occur with the exception of IIC policy of employment-at-will. All such changes will be communicated through official notices and I understand that revised information may supersede, modify or eliminate existing policies.

I acknowledge that I have received, reviewed and understand my personal copy of the IIC Employee Handbook. In consideration of my employment with IIC, I agree to observe and abide by the conditions of employment, policies and rules contained in this handbook. I also understand and agree to all other school policies set forth including, but not limited to, those prohibiting sexual harassment and discrimination, non-disclosure and confidentiality policies.

I further understand and agree that my employment is entered into voluntarily, and at all times shall remain "at-will". Just as I am free to resign at any time and for any reason, IIC is free to terminate my employment at any time, for any reason. I understand that the terms and conditions set forth in this handbook represent the entire understanding between IIC and me and that this understanding cannot be amended or altered in any way by oral statements made to me. The only way in which any understanding set forth in this handbook can be altered is by written agreement signed and dated by the owners of IIC.

This handbook is not intended to restrict an employee's right to discuss, or act together to improve, wages, benefits and working conditions with co-workers or in any way restrict employees' rights under the National Labor Relations Act.

Employee Name

Employee Signature

Date

EMPLOYEE HANDBOOK ACKNOWLEDGEMENT

(EMPLOYER COPY)

I acknowledge that this employee handbook is neither a contract of employment nor a legal document. I have received the handbook, and I understand that it is my responsibility to read and comply with the policies contained in this handbook and any revisions made to it.

The employee handbook describes important information about IIC and I understand that I should consult my supervisor regarding any questions not answered in the handbook. I have entered into my employment relationship with IIC voluntarily and acknowledge that there is no specified length of employment. Accordingly, either IIC or I can terminate the relationship at will, with or without cause, at any time, so long as there is no violation of applicable federal or state law.

Since the information, policies and benefits described here are necessarily subject to change, I acknowledge that revisions to the handbook may occur with the exception of IIC policy of employment-at-will. All such changes will be communicated through official notices and I understand that revised information may supersede, modify or eliminate existing policies.

I acknowledge that I have received, reviewed and understand my personal copy of the IIC Employee Handbook. In consideration of my employment with IIC, I agree to observe and abide by the conditions of employment, policies and rules contained in this handbook. I also understand and agree to all other school policies set forth including, but not limited to, those prohibiting sexual harassment and discrimination, non-disclosure and confidentiality policies.

I further understand and agree that my employment is entered into voluntarily, and at all times shall remain "at-will". Just as I am free to resign at any time and for any reason, IIC is free to terminate my employment at any time, for any reason. I understand that the terms and conditions set forth in this handbook represent the entire understanding between IIC and me and that this understanding cannot be amended or altered in any way by oral statements made to me. The only way in which any understanding set forth in this handbook can be altered is by written agreement signed and dated by the owners of IIC.

This handbook is not intended to restrict an employee's right to discuss, or act together to improve, wages, benefits and working conditions with co-workers or in any way restrict employees' rights under the National Labor Relations Act.

Employee Name

Employee Signature

Date