



AMERICAN YACHT HARBOR
An Island Global Yachting Destination

EMPLOYEE HANDBOOK

ARRIVING IS JUST THE BEGINNING



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Welcome to Island Global Yachting ("IGY"). We are so glad that you have joined our worldwide team. IGY has the privilege of being the premier owner, developer, and manager of luxury marinas and lifestyle destinations worldwide. Our success is dependent upon the outstanding work of our team members around the world, and we are pleased that you have chosen to join the IGY family.

At your time here at IGY, I encourage you to pursue your role with excellence and with the highest quality of work possible. It is the result of our team members' continued dedication, efforts, and high quality of work whether in housekeeping, facilities, maintenance, on the docks, at the front desk, IT, or in the corporate offices, that IGY has and continues to be the marina industry leader, innovator, and standard bearer. I am very proud of all that we have accomplished thus far and am enthusiastic about our future.

Thank you for joining the IGY family. I look forward to working with you as we continue to grow and excel in the years ahead.

Sincerely,

A blue ink handwritten signature, appearing to read "Tom Mukamal", with a long horizontal flourish extending to the right.

Tom Mukamal
President

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INTRODUCTION

ABOUT YOUR HANDBOOK

This Handbook was developed to acquaint you with IGY-AYH St Thomas Holdings, LLC dba American Yacht Harbor (“AYH” or the “Company”) and to provide you with information about working conditions, employee benefits, and some of the policies affecting your employment. You should read, understand, and comply with all provisions of the Handbook. It describes many of your responsibilities as an employee and outlines the programs developed by AYH to benefit employees. It is our desire to create a safe and meaningful work environment, one that is conducive to both personal and professional growth, to recognize individual contributions, and to make open, direct and personal communication a part of our organization.

This Handbook summarizes AYH’s personnel policies and plans that are now in effect and controlling. It is intended only as a guideline and is certainly not all-inclusive. We welcome and encourage any suggestions you may have for improving your work environment and any aspect of our policies. **AYH’s management specifically reserves the right to amend the policies contained herein at its sole discretion with or without notice to AYH employees.**

This Handbook contains rules, regulations and general information regarding AYH. Read the Handbook carefully. You will be required to sign an “Acknowledgement of Receipt of Handbook and Disclaimer of Contract.” You are expected to read and understand the Handbook so it is very important that you do in fact read this Employee Handbook, understand its contents. If you have any questions contact your Manager or Human Resources.

Employment is Not Contractual

You have voluntarily entered into employment at AYH and are free to resign at any time, for any reason, with or without cause. Similarly, AYH may terminate the employment relationship at any time, with or without notice, cause or reason.

NONE OF THE POLICIES OR GUIDELINES CONTAINED IN THIS EMPLOYEE HANDBOOK CREATES EITHER AN EXPRESSED OR IMPLIED CONTRACT WITH REGARD TO THE SPECIFIC POLICIES CONTAINED IN THIS EMPLOYEE HANDBOOK. THIS EMPLOYEE HANDBOOK DOES NOT CREATE A CONTRACT OF EMPLOYMENT.

No representative of the Company, has any authority to enter into any employment agreement for any specified period of time.

Revisions, Additions and Confidentiality

No employee handbook can anticipate every circumstance or question about a policy. The need may arise and AYH reserves the right to revise, supplement, or rescind any policies or portion of the Handbook from time to time as it deems appropriate, at its sole and absolute discretion.

These provisions supersede all existing policies and practices, including those contained in any prior edition or version of the Handbook.

Some of the subjects described here are covered in detail in official policy or benefit documents. You should request and refer to these other documents for specific information since this Handbook only briefly summarizes those benefits. Please note that the terms of the written insurance policies or benefit plan documents are controlling.

Please treat this Handbook and the information in it as confidential. No portion of this Handbook should be disclosed to others, except AYH employees and others affiliated with AYH whose knowledge of the information is required in the normal course of business.

MISSION

We have developed a mission, and vision to help us achieve our goals and uphold our values. This mission should guide how we do business and how to make decisions when faced with choices.

Our Vision

IGY will be the industry leader in creating a global network of yachting lifestyle destinations for mega yachts and premier marinas.

Our Mission Statement

We will consistently provide our customers with the ultimate waterfront lifestyle experience by establishing a world class level of quality in our locations, facilities, services, and people.

We will deliver outstanding returns to our shareholders and business partners through;

- (a) the creating and operation of a global network of yachting lifestyle destination in prime locations, and
- (b) the delivery of superior service to vessel owners, crew and visitors by skilled, empowered and caring team members.

OPEN COMMUNICATIONS & OPEN DOOR POLICY

Our experience has shown that when employees deal openly and directly with Managers, the work environment can be excellent, communications can be clear, and attitudes can be positive. We believe that AYH amply demonstrates its commitment to employees by responding effectively to employee concerns.

Problem Solving Procedure

We realize that misunderstandings and differences of opinion sometimes develop in the daily work situation. Should a problem or concern arise, the following problem solving procedure will assist with its resolution:

- Discuss your problem or concern with your Manager, who will listen and investigate or make recommendations as to how your problem might be resolved. We encourage you to try to resolve such matters through open discussion with your Manager.
- If you are uncomfortable taking your concern to your Manager, or if he/she does not help you to your satisfaction, you can take your concern directly to the next level of management or to Human Resources.
- If your problem or concern still is not addressed to your satisfaction, you may make a demand for arbitration under the terms of your Dispute Resolution Agreement.

By bringing any dissatisfaction or complaint of any nature out into the open, most problems can be improved, if not resolved. We will work to resolve problems in the best interest of both you and AYH.

DO YOU HAVE IDEAS AND SUGGESTIONS?

If you have any suggestions or ideas that you feel would benefit AYH, we would encourage you to tell us about them. We are always looking for suggestions that improve methods, procedures and working conditions, increase income and reduce costs or errors that will benefit the Company and its employees.

EMPLOYMENT POLICIES AND PROGRAMS

EQUAL OPPORTUNITY

AYH is an equal opportunity employer. This equal employment opportunity policy is consistent with the requirements and objectives established by the Civil Rights Act of 1964, the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, the Presidential Executive Order 11246 and other civil rights laws, all as amended.

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at AYH will be based on merit, qualifications, and abilities. AYH does not unlawfully discriminate in employment opportunities or practices on the basis of race, color, religion, creed, sex, pregnancy, national origin, citizenship, age, veteran status, political affiliation, disability, or any other characteristic protected by law ("protected status"). AYH will not unlawfully discriminate against any qualified employee or applicant on the basis of a physical or mental disability.

All supervisory personnel shall, in advertising and posting job opportunities, make reasonable efforts to ensure that the information regarding those job opportunities is properly and effectively disseminated internally within the organization. All advertisements shall state in clearly distinguishable type that AYH is an "Equal Opportunity Employer."

When opportunities for job advancement occur and persons who are already employed by the Company are qualified to fill such positions, the job posting process and selection procedure shall allow all qualified employees to apply and be considered for the advancement opportunity.

It is the responsibility of all supervisory personnel to see that this policy is continued in its full spirit and intent.

If you believe you have witnessed or experience any form of discrimination, or if you have questions concerning this policy, you should notify your Manager or Human Resources immediately. If you believe it would be inappropriate to discuss the matter with your supervisor you may bypass that individual and report it directly to the Human Resources Manager or any other level of management. Reports will be investigated, and appropriate corrective action will be taken. Complaints will be handled confidentially, except as necessary for investigation and resolution. This policy prohibits retaliation, harassment or other adverse action being taken against you because of making a complaint of discrimination, assisting in an investigation, opposing discrimination or otherwise exercising rights protected by law.

NON-DISCRIMINATION / HARASSMENT

AYH is committed to maintaining a work environment in which all individuals are treated with respect and dignity. In keeping with this commitment, we will not tolerate harassment of our employees by anyone, including executives, supervisors, co-workers, vendors, or clients of the Company. Harassment in employment is prohibited, both in the workplace and off the premises, including at social activities conducted or sponsored by the Company. The Human Resources Department has the overall responsibility for this policy and maintains reporting and monitoring procedures. Employees' questions or concerns should be referred to Human Resources. Appropriate disciplinary action may be taken against any employee willfully violating this policy.

Harassment Defined

Harassment is defined as verbal, physical, or visual conduct based upon a person's protected status, such as gender, color, race, ancestry, religion, national origin, age, physical handicap, medical condition, disability, marital status, veteran status, citizenship status, or any protected personal characteristic, which:

1. Denigrates or shows hostility or aversion toward an individual because of his/her protected status, or that of his/her relatives, friends or employees; or

2. Has the purpose or effect of creating an intimidating, hostile or offensive working environment because of a person's protected status; or
3. Has the purpose or effect of unreasonably interfering with an individual's work performance because of a person's protected status; or
4. Otherwise adversely affects an individual's employment opportunities because of the individual's protected status.

Prohibited harassment includes, but is not limited to, epithets, slurs, jokes, e-mails, negative stereotyping, or threatening, intimidating or hostile acts that relate to any protected status. Prohibited harassment also includes written or graphic material that is placed on walls, bulletin boards or elsewhere on the premises, or circulated in the workplace. Harassment can consist of unwelcome conduct, whether verbal, physical, or visual, that is based upon a person's protected status, such as gender, color, race, ancestry, religion, national origin, age, physical handicap, medical condition, disability, marital status, veteran status, citizenship status, or any protected personal characteristic. The Company will not tolerate prohibited or unlawful harassment.

Sexual harassment deserves special mention. Unwelcome sexual advances, requests for sexual favors, and other physical, verbal, or visual conduct based on gender can constitute sexual harassment, particularly when:

- Submission to the conduct is an explicit or implicit term or condition of employment,
- Submission to or rejection of the conduct is used as the basis for an employment decision, or
- The conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Sexual harassment may include, but is not limited to the following:

- Repeated unwelcome requests for a romantic relationship,
- Explicit sexual propositions, sexual innuendo, suggestive comments,
- Sexually oriented "kidding" or "teasing," "practical jokes," jokes about gender-specific traits,
- Foul or obscene language or gestures,
- Display or circulation in the workplace of sexually suggestive objects or pictures (including through e-mail), and
- Physical contact, such as patting, pinching, or brushing against another's body.

AYH requires that all incidents of discrimination, harassment or retaliation be reported, regardless of the offender's identity or position. Individuals who believe they have witnessed or experienced conduct that they believe is contrary to the Company's harassment or discrimination policy or who have concerns about such matters should file their complaints with their immediate Manager, any member of management, or Human Resources. Individuals should not feel obligated to file their complaints with their Manager first before bringing the matter to the attention of one of the other Company's designated representatives identified above.

Procedure for Complaints

The Company's policy is to investigate all such complaints thoroughly and promptly. To the extent practicable, the Company will keep complaints and the terms of their resolution confidential. If an investigation confirms that a violation of Company policy has occurred, the Company will take corrective action, including such discipline up to and including immediate termination of employment as is appropriate.

AYH prohibits retaliation against any individual who makes a good-faith report of discrimination or harassment or participates in an investigation of such reports. Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action.

All Company employees are responsible for helping to assure that we avoid harassment. If you feel that you have experienced or witnessed conduct contrary to this policy you have an obligation to immediately take advantage of this complaint procedure.

If an employee is asked to participate in an investigation, that employee is required to cooperate fully. The employee must participate in any interviews requested and must give complete and truthful answers to all questions asked. Further, if an employee is aware of any information that may be pertinent, the employee is obligated to share that information with the company manager conducting the investigation, whether or not the information is specifically requested.

Early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment. Therefore, while no fixed reporting period has been established, AYH strongly urges the prompt reporting of complaints or concerns so that rapid and constructive action can be taken.

The availability of this complaint procedure does not preclude individuals who believe they are being subjected to harassing conduct from promptly advising the offender that his or her behavior is unwelcome and requesting that it be discontinued.

If an employee making a complaint does not agree with its resolution, the employee may appeal to the Company's President, General Counsel or Chief Executive Officer.

AMERICANS WITH DISABILITY ACT (ADA)

AYH is committed to complying with all applicable provisions of the Americans with Disabilities Act ("ADA") as amended. It is AYH's policy not to discriminate against any qualified employee or applicant with regard to any terms or conditions of employment because of such individual's disability or perceived disability so long as the employee can perform the essential functions of the job. Consistent with this policy of nondiscrimination, AYH will provide reasonable accommodations to a qualified individual with a disability, as defined by the ADA, who has made the Company aware of his or her disability, provided that such accommodation does not constitute an undue hardship on the Company.

Employees with a disability who believe they need a reasonable accommodation to perform the essential functions of their job should contact the Human Resources Department. AYH encourages individuals with disabilities to come forward and request reasonable accommodation.

PROCEDURE FOR REQUESTING AN ADA ACCOMMODATION

Upon receipt of an accommodation request, the employee's Manager and the Director of Human Resources will meet with the employee to discuss and identify the precise limitations resulting from the disability and the potential accommodation that the Company may make to help overcome those limitations.

AYH will determine the feasibility of the employee's request for accommodation considering various factors, including, but not limited to the nature and cost of the accommodation, the availability of tax credits, outside funding, deductions, AYH's overall financial resources and organization, and the accommodation's impact on the operation of the Company, including its impact on the ability of other employees to perform their duties and on AYH's ability to conduct business.

AYH will inform the employee of its decision on the accommodation request. If the accommodation request is denied, the employee will be advised of their right to appeal the decision by submitting a written statement explaining the reasons for the request. If the request on appeal is denied, that decision is final.

The ADA does not require AYH to make the best possible accommodation, to reallocate essential job functions, or to provide personal use items (i.e., eyeglasses, hearing aids, wheelchairs etc.). An employee or job applicant who has questions regarding this policy or who believes that he or she has been discriminated against based on a

disability should notify the Director of Human Resources. All such inquiries or complaints will be treated as confidential to the extent permissible by law.

IMMIGRATION LAW COMPLIANCE

Each new employee, as a condition of employment, must complete the Employment Eligibility Verification I-9 Form and present documentation establishing identity and employment eligibility. This policy is in compliance with the Immigration Reform and Control Act of 1986.

Transition and transfer of employees to other subsidiaries and affiliates must comply with local regulations. In the case of a relocation, the employment relationship will change to adhere to local regulations, policies/procedures and the compensation and benefits of that location.

Employees with questions or those seeking more information on immigration law issues are encouraged to contact Human Resources. Employees may raise questions or complaints about immigration law compliance without fear of reprisal.

INTRODUCTORY PERIOD

All newly hired employees, and any current employees who have been transferred, promoted or reassigned to a new position, are employed with the understanding that their first 90 days in their position is an introductory period. This introductory period is applicable to all classes of employees and is a try-out time for both the employee as well as the Company.

This orientation period provides an opportunity for both you and AYH to evaluate each other and to determine the desirability of continuing the employment relationship. During this time, you will be provided with training and guidance from your Manager.

During this introductory period, an employee's job performance, time and attendance habits and general attitude will be evaluated. If at any time an employee does not meet the standards of AYH, we may terminate your employment.

Provided the job performance is "satisfactory" at the end of the introductory period, you will continue in your employment as an at-will employee. The orientation period does not represent a guarantee or contract of employment and all aspects of "Employment-At-Will" will continue to apply.

Completion of the introductory period does not guarantee continued employment for a specified period of time, nor does it require that an employee be dismissed exclusively "for cause".

Applicant Reference and Background Checks

To ensure that individuals who join AYH are well qualified and have a strong potential to be productive and successful, it is the policy of AYH to check the employment references of all applicants.

Likewise, as a condition of employment, a release to conduct a background check is required. Examples include: driving records, criminal background, and credit checks, etc.

Providing References for Former Employees

Only the Human Resources Department or other members of Senior Management are authorized to respond to inquiries for reference checks for current or former AYH employees. Responses to such inquiries will be limited to confirmation of position and dates of employment.

PERFORMANCE

The results that AYH achieves are determined by how we perform – as individuals, teams, and as a company. The ways we focus our efforts, use our talents, manage our time and work together will determine our success. We emphasize the importance of ongoing communication between you and your Manager about your performance, progress toward job expectations, results and any development or needs that you may have.

You and your Manager are strongly encouraged to discuss job performance and goals on an informal, day-to-day basis. Additional formal performance evaluations are conducted to provide both Managers and employees with the opportunity to discuss job tasks, identify and correct weaknesses, encourage and recognize strengths, and discuss positive, purposeful approaches for meeting goals.

The performance of all employees is generally evaluated according to an ongoing 12-month cycle.

Goal Setting

One of the most important aspects of the Performance Management process is goal setting. In this process, you and your Manager meet in a highly participative manner to:

- Update your description of job duties and responsibilities so it reflects the current requirements and primary job content;
- Mutually agree upon and establish written objectives that clearly define what is expected of you;
- Ensure that individual goals and objectives are compatible with those of the work unit and the Company as a whole;
- Negotiate agreement on a weighting for each objective as a means of prioritizing what's important;
- Establish measures and standards that clarify how you will know if targets are being achieved; and
- Agree on performance tracking and feedback requirements necessary for self-management or monitoring progress.

At its sole discretion, AYH may award merit-based pay adjustments in an effort to recognize truly superior employee performance. The decision to award such an adjustment is dependent upon numerous factors, including the information documented by this formal performance evaluation process.

OUTSIDE EMPLOYMENT

The Company does not generally limit an employee's activities during non-working hours unless those activities create a conflict of interest, interfere with or are in conflict with the performance of an employee. Unless approved in advance and in writing by the General Manager, EVP of Operations or the Director of Human Resources, employees are prohibited from working for any tenant of AYH and may not perform additional duties for guests of the marina.

As a condition of employment, all employees must sign a non-compete agreement.

PROMOTIONS AND TRANSFERS

To provide our employees with opportunities for growth and advancement, AYH attempts to fill many of its job openings with qualified candidates from within. Internal candidates may be identified by management selection or thorough responses to internal job postings.

You are encouraged to seek advancement opportunities and to obtain promotion and career guidance from your Manager and/or Human Resources.

Job Posting

Whenever practical, internal position opportunities will be communicated via internal announcement or through the Human Resource Department.

To be considered for an internal job opportunity, you must:

- Possess the skills, education and experience required;
- Be performing satisfactorily in your current position;
- Have been in your current position at AYH for a period of 6 months and have demonstrated job proficiency.

If you are interested in promotion or transfer opportunities, it is ultimately your responsibility to apply for the position opening before the deadline shown on the job posting and to make your intentions known to your Manager.

Consideration will be given based on the individual's skills, education, experience and qualifications, and will be in adherence to AYH's policy of equal employment opportunity.

EMPLOYMENT RECORDS

AYH maintains employment records on each employee. Your employment application and all other records that require specific information about you become part of your employment record. Information submitted on the employment application and other employment forms is subject to verification by the Company. If the Company determines you have provided false or misleading information, you may be subject to disciplinary action up to and including termination.

Keeping Your Files Up To Date

It is your responsibility to ensure your employment records are kept up-to-date. This includes notifying us of any changes in the following types of information:

- Name
- Telephone number
- Home and/or mailing address
- Number and identity of dependents (for benefits and tax purposes only)
- Telephone numbers and addresses of dependents, spouse, former spouse (for insurance purposes only)
- Beneficiary designations (for benefits purposes only)
- Persons to be notified in case of emergency
- Driving record or status of driver's license if you operate a Company vehicle or your position routinely requires you to drive during regular business hours
- Military or draft status

If there is a change to these types of information, you must notify Human Resources as soon as possible.

Reviewing Your Employment Records

Employment records are the property of AYH, and access to the information they contain is restricted. Generally, only supervisors and management personnel of AYH who have a legitimate reason to review information in a file are allowed to do so. All employment files and records are kept in a secured locked location.

With reasonable advance notice, employees may review their own employment records in AYH's offices and in the presence of an individual appointed by AYH to maintain the files. If you wish to review your employment records, contact Human Resources to schedule a file review.

SEPARATION FROM THE COMPANY

Every Company employee has the status of "employee-at-will," meaning that no one has a contractual right, express or implied, to remain in the Company's employ unless they enter into a written contract signed by the President. This means the Company or an employee may terminate his/her employment, without cause, and with or without

notice, at any time for any reason. No Manager or other representative of the Company (except the President) has the authority to enter into any agreement for employment for any specified period of time, or to make any agreement contrary to the above.

Resignation

If you initiate your separation from the Company, it is considered a voluntary resignation. If you elect to resign, your Manager would like the opportunity to discuss your resignation before final action is taken. The Company often finds during this conversation that another alternative may be better. If, however, after full consideration you decide to leave, it is requested that you provide the Company with a written two-week advance notice period (bear in mind that vacation days may not be included in the two-week notice period).

Exit Interview

In addition, employees separating from AYH may be asked to participate in an exit interview and provide any constructive comments and suggestions on improving working conditions. The HR Department may conduct or participate in this interview. We appreciate receiving your candid opinion of your employment with us.

Job Abandonment

If you are absent from work for three consecutive days without giving proper notice to your Manager, you are advised that the Company will consider this an abandonment of your job, and your employment will be terminated.

A DRUG FREE WORKPLACE

As part of our commitment to safeguard the health of our employees, to provide a safe place for our employees to work, and to promote a drug free community, AYH has established this policy on the abuse of drugs and alcohol by its employees.

AYH prohibits the following:

- Reporting to work under the influence of alcohol or illegal drugs or substances, including the illegal use of prescription drugs;
- Being intoxicated while on Company premises;
- The consumption, sale or purchase of alcoholic beverages on Company premises or while performing Company business, except in the performance of duties listed on your job description and except in connection with Company-authorized events and gatherings; and
- Working under the influence of prescription or nonprescription drugs that could impair judgment or motor functions and place persons or property in jeopardy.

Possession of paraphernalia used in connection with the use of any drug is evidence of violation of this rule.

A drug means alcohol, an amphetamine, a cannabinoid (marijuana or a derivative), cocaine, phencyclidine (PCP), a hallucinogen, methaqualone, an opiate, a barbiturate, a benzodiazepine, a synthetic narcotic, a designer drug or a metabolite of any of these substances. Non-prescribed use of prescription medication is also prohibited. Employees may be tested for any and all of these drugs.

As a part of our policy prohibiting reporting to work or working with the presence of drugs, drug testing may be required. The Company must and will conduct drug tests under the following circumstances:

- For an employee whose conduct or appearance creates a reasonable suspicion of improper use or possession of drugs.
- For an employee subject to regular fitness-for-duty medical examination.
- For an employee previously given a drug-related suspension or a leave of absence for prohibited drug use. Such tests may be conducted on a quarterly, semi-annual, or annual basis for up to two years thereafter.

- On a random, unspecified basis.
- For an employee suffering a reportable accident and any other parties employed that are associated with the accident.
- For an employee involved in any accident involving a motor vehicle or machinery, even if the accident would otherwise not be reportable.

Refusal to cooperate in the drug testing procedure will result in termination of employment.

Investigation – Site Inspections

AYH reserves the right to access and inspect all Company-owned areas. Desks, lockers, computer contents, cabinets, drawers, etc., are provided for the convenience of employees and may be searched at any time to the extent considered necessary by management. Please cooperate with us on this matter, as it is done for your protection. AYH also reserves the right to search employee property on Company property, such as handbags, lunch boxes, briefcases, laptops, and employee cars on Company property. AYH may, but is not required to, obtain the employee's consent when property belonging to or used by an employee is to be searched. Where possible, the employee will be notified of the search and should be present. The search should be carried out in privacy, but with a supervisory witness.

Employee Assistance Program

If you are experiencing problems leading to or resulting from drug or alcohol abuse or dependency, we encourage you to seek counseling and rehabilitation services. You may contact your medical insurance carrier or Human Resources for a confidential referral.

EXPECTATIONS AND STANDARDS

ATTENDANCE AND PUNCTUALITY

To maintain a safe and productive work environment, AYH expects you to be reliable and to be punctual in reporting for scheduled work. Absenteeism and tardiness place a burden on other employees and on AYH. In the rare instances when you cannot avoid being late to work or are unable to work as scheduled, you should notify your Manager as soon as possible in advance of the anticipated tardiness or absence.

Call-In Procedure

If it is necessary for you to be late or absent for any reason, you are responsible for following the call-in procedure for your work team or department.

While call-in procedures vary by department and location, there are some general requirements that are universal to all employees:

- You should telephone your Manager at least one hour before your starting time, if possible.
- If you are unable to make the call because of the medical condition, then you should have a person make the call for you and you should personally contact your Manager at your earliest opportunity.
- If you cannot reach your Manager when you call, speak with the person designated by your department.
- You must speak personally with an appropriate person. Leaving a message on voice mail or text is not sufficient.
- Provide an explanation of why you are going to be late or absent and when you expect to return to work. Also leave a phone number where you can be reached.
- If appropriate, provide an update on any pending work assignments that may need to be handled in your absence. Your Manager may need to reschedule/redistribute your work activities while you are absent.

It is your responsibility to ask your Manager for the specific procedures applicable to your location and ensure that proper notification is given. Failure to do so will subject you to disciplinary action up to and including termination.

Poor attendance and excessive tardiness are disruptive. Either may lead to disciplinary action, up to and including termination of employment.

WORK RULES AND STANDARDS

Work rules and standards regarding employee behavior are necessary in any company for the company's efficient operation and for the benefit and protection of the rights and safety of all. AYH is no exception. This section of your Handbook summarizes some of our expectations and work rules. The following lists are by no means all-inclusive.

Our Expectations

We expect our employees to be honest, reliable and conscientious in meeting the responsibilities of their job, and to perform all duties competently, professionally, and responsibly. In order to meet these expectations, you must understand and abide by the standards that govern job conduct. The following are examples of expectations that AYH has and some of the responsibilities you must observe:

- Comply with all of AYH's policies, procedures, safety and security guidelines.
- Learn your job and perform it to the best of your ability – efficiently, accurately, and safely.
- Take initiative to excel in your job and cooperate with your work team. Let us know your ideas for innovation and improvement.
- Speak up when you have problems, concerns or complaints.
- Report to work on time. Others depend on you.
- When you will be absent from work, or unable to arrive on time, follow the call-in procedure for your work team.
- Treat all clients, visitors and co-workers with respect and courtesy. Provide the highest level of service to all clients.
- Follow and respect management's direction concerning job-related matters.
- Maintain the confidentiality of proprietary and confidential Company and customer information.
- Present a professional, neat, and clean appearance appropriate to your work situation.
- Report to management any violations of the Company's policy, unethical or illegal conduct by co-workers, clients or vendors.
- Refrain from offensive or undesirable behavior or conduct.

Examples of Conduct Not Permitted

In general, conduct that interferes with operations, brings discredit to AYH or is offensive is not tolerated. The following are examples of conduct not permitted. Such conduct will subject the individual involved to disciplinary action up to and including termination.

- Failure to meet performance standards and fulfill job requirements.
- Refusal to follow management's instructions concerning a job-related matter (insubordination).
- Unsafe practices or unsafe performance of any job.
- Leaving the workplace during working hours without authorization.
- Unauthorized use of Company or customer assets, including equipment, property, information and funds.
- Improper use or disclosure of proprietary or confidential Company or customer information.
- Violation of the Code of Business Conduct (as outlined in this Handbook under separate section).
- Theft, misuse or willful destruction of Company property or of another individual's property.
- Harassing, sexually or otherwise, another employee, business employee or customer, or failing to report harassment.

- Improper, unprofessional, or threatening behavior or language while on Company property or on Company business.
- Lying, providing false information to, or any other instance of being dishonest with employees, Managers or clients.
- Failure to report any knowledge of theft or other activities not in the best interest of AYH.
- Any action that is or can reasonably be expected to be detrimental to AYH or its reputation.
- Any violation of AYH's substance abuse policy.
- Violation of Company safety or security policies or procedures.
- Deliberately interfering with the operations of the Company.
- Falsifying any Company record or report, including applications for employment, time sheets and client records.
- Possession of firearms, weapons, ammunition or explosives on Company property or while on Company business.
- Conviction of a crime committed in any Company workplace or during working hours.

These examples are illustrative of the types of behavior that are not permitted at AYH, but are not intended to be all-inclusive. Other types of behavior or conduct could also lead to disciplinary action up to and including immediate termination. You are expected to comply with all Company policies and procedures and all standards of conduct.

Disciplinary Action

AYH seeks to resolve performance and conduct problems in the most positive and constructive manner possible. We believe our employees are responsible individuals interested in working together toward common goals. When situations arise which warrant disciplinary action, AYH will utilize corrective action to deal with the misconduct.

Improper conduct or improper work performance, regardless of whether covered by the specific rules of conduct above, may be grounds for disciplinary action in the judgment of the Company.

Disciplinary action may range from verbal, written or final warnings to suspension or immediate termination, depending upon the facts of the particular case and the employment history of the employee involved.

APPEARANCE AND DRESS CODE

All employees must take pride in and present a professional, well groomed appearance. Each employee is cautioned against using excessive amounts of perfume, cologne or other scents. Excessive gels, lotions and distinct shaven styles are not acceptable. Hair should be clean, combed, and neatly trimmed or arranged. Shaggy, unkempt hair is not permissible regardless of length. Sideburns, moustaches, and beards should be neatly trimmed. Men or women may wear locks as long as they are neat and clean at all times.

Uniform and Name Tag Policy

All employees will be informed when hired of proper uniform attire for their specific position. All employees must wear the appropriate uniform while on duty. Uniforms must be neat, clean and pressed at all times. Cleaning of uniforms will be the responsibility of the employee. Uniforms must be worn whenever an employee is on property and on duty. Employees may not wear their uniforms on property unless they are reporting for duty. If a hat or cap is provided as part of your uniform, these should be worn at all times. Shoes must be in compliance with the safety standards as designated by management. An employee may not affix any jewelry or adornment of any type to their uniform with the exception of nametag, security badge, or other company-sponsored promotion. Employees who are provided a name tag, are required to wear this at all times. They are to be worn as instructed. Employees are not allowed to affix any adornment to the nametag unless provided by management.

All uniforms must be worn with shirts tucked in and sized to fit the frame of the employee. Failure to arrive at work looking like you are ready for work in regards to your presentation will result in being suspended without pay until you arrive back at work dressed accordingly. Repeated uniform indiscretions will lead to disciplinary action and possible termination of your employment.

Additional appearance restrictions follow:

- no jeans and denim
- no ill-fitting or visible undergarments
- no stained, un-ironed or wrinkled clothing
- no flip-flops, slippers or bedroom footwear, unless required for medical reasons
- nails should be trimmed short so as not to hamper normal use of hands
- no bare feet
- no body piercings or tattoos must be visible
- no earring visible on any part of the body, worn in the nose, eyebrows, mouth or eyes, only one earring per ear will be permitted
- no attachments, other than name or security badge, length of service award or company sponsored promotion
- no earrings larger than a nickel
- no dark glasses should be worn indoors except for medical reasons
- shirts should be tucked in at all times

INTERNAL AND EXTERNAL CUSTOMER SERVICE

Island Global Yachting Ltd.'s mission is to be world-renowned for first-class service and care. Superb customer service is everyone's responsibility and every employee must be able to deliver on this consistently.

Providing excellent customer service should be at the heart of everything you do. This means we expect the following from each of our employees:

- Establish and maintain effective relationships with clients, and work to gain their trust and respect.
- Always act with clients in mind.
- Work together (as a team) to support customer-focused goals and strategies.
- Exceed customer expectations at every customer touch-point.
- Work to obtain first-hand customer information and use it for improvements in products and services. Be dedicated to meeting the expectations and requirements of your internal and/or external clients.

Remember ... you are a representative of the Company. To the client, you are the Company.

Customer Communication

Your job brings you into contact with many people – including both internal and external clients. Difficult situations and complaints may arise – regardless of how flexible, energetic or friendly you may try to be!

You are expected to communicate in a friendly and upbeat manner with our customers. This means greeting them with a wave when they are in sight, a “good morning/afternoon” as soon as the customer is at hearing distance, and a handshake when you are close. Don't forget the smile to go with your actions!

Also in an office environment we shake hands, welcome and greet the customer with a smile. Unless you are in the process of handling the customers' administration on a PC, you should be standing up when talking to the customer and move to their side of the counter.

Always treat clients and business guests in a courteous, respectful manner. When a client has a question or complaint, give the matter your immediate attention. Look at complaints as an opportunity – to correct problems, improve customer service and ultimately raise customer satisfaction. If you ever feel you cannot properly handle a problem or difficult situation, refer the client to your Manager or a member of management.

Telephone Courtesy

Telephone courtesy is essential to maintaining a favorable business reputation. Your telephone manners are a direct reflection on the Company and your professionalism. Therefore, please use proper telephone manners – be clear, polite, helpful and service-oriented on the phone at all times.

The telephone must always be answered in the following fashion. “Good (morning, afternoon, evening) this is American Yacht Harbor, this is (your name) how may I help you.” Always answer the telephone with a smile and a pleasant disposition. When transferring calls to another extension, employees must always identify the caller before transferring the call.

Phone calls must be returned promptly and certainly no later than 24 hours. If a caller has asked a question which an employee cannot answer, let the client know you are working on his/her issue. Continually communicate the status of your progress in resolving the issue to the customer.

BUSINESS CONDUCT

The successful business operation and reputation of AYH is built upon the principles of fair dealing and ethical conduct of our employees. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

The continued success of AYH is dependent upon our clients’ trust and we are dedicated to preserving that trust. It is the Employees responsibility to AYH’s clients and fellow employees to act in a way that will merit the continued trust and confidence of the public.

The standards and expectations outlined in the Code of Business Conduct are intended as a guide to making the right choice. When faced with a complicated situation, it is often difficult to decide where the ethical path lies. You have a responsibility to ask questions, seek guidance, report suspected violations, and express concerns regarding compliance with the Code and related procedures.

AYH’s Code of Business Conduct

Unlawful and unethical business practices are of particular concern to AYH because they undermine employee and customer trust. AYH’s Code of Business Conduct includes the following principles:

- **Conflicts of Interest:** You must conduct yourself in a manner that avoids conflicts of interest and that upholds the Company’s business reputation.
- **Confidential Nature of Work:** Keep proprietary and personnel information to yourself and avoid compromising integrity.
- **Fraud Dishonesty and Criminal Conduct:** Fraud, dishonesty and criminal conduct by employees will not be tolerated.

Conflicts of Interest

Employees have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. This policy establishes only the framework within which AYH wishes the business to operate. The purpose of these guidelines is to provide general direction so that employees can seek further clarification on issues related to the subject of acceptable standards of operation. Contact the Chief Financial Officer or the President for more information or questions about conflicts of interest.

An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or for a relative as a result of AYH's business dealings. For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

No "presumption of guilt" is created by the mere existence of a relationship with outside firms. However, if employees have any influence on transactions involving purchases, contracts, or leases, it is imperative that they disclose this information to an officer of the Company as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.

Personal gain may result not only in cases where an employee or relative has a significant ownership in a firm with which AYH does business, but also when an employee or relative receives any kickback, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving AYH (which is strictly prohibited).

Gifts, Gratuities and Business Courtesies

AYH is committed to doing business and conducting operations solely on the merit of our performance. With this aim in mind, we will seek to avoid any action which may create the perception of preferential treatment being given, sought or exchanged to outside contractors, vendors or suppliers in exchange for business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom AYH does or may do business. AYH will neither give nor accept business courtesies that constitute or could reasonably be perceived as constituting unfair business inducements that would violate applicable law, AYH regulation or policies, or embarrass or reflect negatively on AYH's reputation.

Gratuities are never to be expected but may be graciously accepted when offered by a customer. Attempts to secure gratuity by any means is a violation of company policy and/or legal statutes and will result in disciplinary action and/or criminal prosecution if applicable. In addition, demonstration of a poor attitude towards customers as a result of small or non-existent gratuity will result in disciplinary action.

NOTE: Employees are responsible for reporting tips as income for tax purposes.

Cellular Phone and Camera Use Guidelines

Use of personal cellular phones is not permitted while an employee is on duty. Employees are asked to make personal calls on non-work time and to ensure that friends and family members are aware of the Company's policy. Flexibility will be provided in circumstances demanding immediate attention.

Employees are also strictly prohibited from using cameras or camera phones on Company property.

Chewing Gum

Employees must not chew gum while on duty.

Autograph Policy

Employees are not permitted to solicit autographs from guests while on Company property. Violation of this policy is grounds for disciplinary action up to and including termination.

No Solicitation Policy

Employees, guests and visitors may not fundraise, solicit or distribute literature, products, and raffles to any employee or guest.

Confidentiality

Your position at AYH may provide you with access to confidential information. The release of confidential information and/or trade secrets, whether intentional or unintentional, can injure the Company financially and competitively. Confidential information includes, but is not limited to, the following examples:

- Any information about the presence of a guest, including their arrival and departure time
- New methods and materials research
- Pending projects and proposals
- Proprietary production processes
- Research and development strategies
- Technological data
- Technological equipment and prototypes
- Employee information (including salary information; others or your own)

All Company records and information relating to the Company or its clients are confidential and employees must, therefore, treat all matters accordingly. No Company or Company-related information, including without limitation, documents, notes, files, records, oral information, computer files or similar materials (except in the ordinary course of performing duties on behalf of the Company) may be removed from the Company's premises without permission from the Company. Additionally, the contents of the Company's records or information otherwise obtained in regard to business may not be disclosed to anyone, except where required for a business purpose. Employees must not disclose any confidential information, purposefully or inadvertently (through casual conversation, or electronically including any blogging, facebook, twitter posts etc) to any unauthorized person inside or outside the Company. Employees that are unsure about the confidential nature of specific information must ask their Manager for clarification.

Any breach of confidentiality will be taken very seriously and may subject you to termination and possibly legal action. If you are unsure if something is confidential, or if you have any questions regarding your responsibilities in dealing with confidential materials, speak with your Manager.

Inventions, Proprietary Rights and Non-Compete Agreement

As an employee of the Company you may be required to sign an Agreement that addresses such things as Inventions, Proprietary Rights and Non-Competition as a condition of employment. You should read this Agreement carefully for additional information regarding your responsibilities to protect the Company's proprietary information. Employees who improperly use or disclose trade secrets or confidential business information will be subject to disciplinary action, up to and including termination of employment, even if they do not actually benefit from the disclosed information.

Fraud, Dishonesty, and Criminal Conduct

AYH will comply with all applicable laws and regulations and expects its directors, officers, and employees to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.

A. Accurate Books and Records

All employees must record and report information accurately and honestly. This includes reports of time worked, business expenses and other business related activity.

AYH's financial statements and the records on which they are based must always accurately and fairly reflect the activities and transactions of the Company in accordance with generally accepted accounting principles and the Company's accounting and financial policies. No undisclosed or unrecorded corporate funds or assets shall be established for any purpose, nor should Company funds be placed in any personal or non-corporate account. No employee shall make an entry on the Company's books and records that intentionally hides or disguises the true nature of a transaction.

B. Criminal Conduct

Criminal conduct by employees will not be tolerated, and such conduct may result in criminal or civil legal action. Criminal conduct includes, but is not limited to:

- Theft, misuse or abuse of Company, employee or customer property, including telephone, computer, or mail resources;
- Violence or threats of violence;
- Bribery or extortion involving AYH's assets or operations.

Compliance

In signing the Acknowledgement for this Handbook, you certify your agreement to abide by this Code of Business Conduct. In addition, this Code requires that you must agree to report any conflicts of interest and any violations of the Code of Business Conduct to a member of Human Resources or a member of management.

Violations

In general, the use of good judgment, based on high ethical principles, will guide you with respect to lines of acceptable conduct. If a situation arises where it is difficult to determine the proper course of action, the matter should be discussed openly with your immediate Manager and, if necessary, with the President for advice and consultation.

Compliance with this policy of business ethics and conduct is the responsibility of all employees. Any employee who violates AYH's Code of Business Conduct or fails to report a violation by another employee will be subject to disciplinary action up to and including termination.

Whistleblowing

"Whistleblowing occurs when a worker raises a concern about danger or illegality that affects others, for example members of the public"
(Chartered Institute of Personnel and Development, 2007)

It is your obligation and ethical responsibility to help enforce our Code of Business Conduct. Employees are encouraged to talk to Supervisors, Managers, Executives or other appropriate personnel about observed or suspected illegal, improper or unethical behavior.

Any employee may submit a good faith complaint or raise a concern, without fear of dismissal or retaliation of any kind. Allegations in bad faith may result in disciplinary action or termination. Bad faith is considered allegations made with malicious intent or for personal gain.

The whistle-blowing procedure is intended to be used for serious and sensitive issues. Such concerns, including those relating to financial reporting, unethical or illegal conduct, may be reported directly to the Whistle Blowing Committee. The Committee's responsibility is to hear complaints, investigate and ensure appropriate action is taken.

The members of this committee are:

Mark Lande, General Counsel	IGY New York Office 717 Fifth Avenue - 18th Floor New York, New York 10022 T: 212.705.5034 F: 212.705.5001 E: [REDACTED]
Jennifer Greene, CFO	IGY South Carolina Office 201 E. McBee Street Greenville, SC 29601 T: 864.552.1900 x102 F: 864.552.1919 E: [REDACTED]
Janice Cole, Director of Risk Management and Human Resources	T: 917.297.7857 E: [REDACTED]

Employment-related concerns should continue to be reported through your normal channels such as your Supervisor, Manager, Human Resources or to the President.

Process for Raising a Concern

The earlier a concern is expressed, the easier it is to take action. Although the employee is not expected to prove the truth of an allegation, the employee should be able to demonstrate to the person contacted, that the report is being made in good faith.

Concerns that can be addressed to the Whistle Blowing Committee would concern issues such as:

- incorrect financial reporting;
- unlawful activity;
- activities that are not in line with IGY's policy, including the Code of Business Conduct; or
- activities, which otherwise amount to serious improper conduct.

Treatment of Complaints and Investigation Procedures

All submissions of concerns and complaints will be held as a confidential matter. Upon receipt of a submission, the Whistle Blowing Committee shall promptly investigate the matter. If a complaint involves one of the Committee members, such member will be excluded from the investigation. The investigation will be handled discreetly and appropriately, and information will be disclosed to others only on a need to know basis or as required by law.

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved without the need for investigation. The extent of the investigation will depend on the particular circumstances, but will involve interviewing employees, third parties, obtaining and reviewing documents, and accessing electronic data information. Employees involved in the investigation as a witness or assisting in the investigation shall be required to maintain confidentiality.

Upon the conclusion of the investigation, the Committee shall provide a report and recommendation to the President and CEO. The report shall set out in detail the specifics of the complaint, the steps taken in the investigation, the factual findings, and the recommendations for corrective action. The President and CEO shall also be provided any documents, interview notes, or other materials necessary to reach an informed decision about the subject matter of the complaint.

The President and CEO shall promptly review the findings and recommendations of the Committee.

At their discretion, the President and CEO may seek such additional advice and counsel including from outside professionals and experts as they deem necessary before reaching a final decision concerning the complaint and appropriate corrective action.

The amount of contact between the complainant and Committee investigating the concern will depend on the nature of the issue and the clarity of information provided. The Committee will notify the complainant of the process status of the investigation, but the Committee is not obliged to provide any details or outcome of the investigation, content of reports or action taken.

No Discrimination or Retaliation

Reprisal, threats, retribution or retaliation against any person who has in good faith reported a violation or a suspected violation of law, this Code or other Company policies, or against any person who is assisting in any investigation or process with respect to such a violation, is both a violation of Company policy and is prohibited by a variety of state and federal civil and criminal laws including the Sarbanes-Oxley Act of 2002. Accordingly, it is the policy of the Company not to allow retaliation for reports of wrongdoing or misconduct by others, made in good faith by employees. Anyone attempting such retaliation will be subject to disciplinary action, up to and including termination of employment.

Employees, regardless of their position, are expected to cooperate in internal investigations of wrongdoing or misconduct.

Confidentiality

Every effort will be made to treat the complainant's identity with appropriate regard for confidentiality. Absolute confidentiality, however, cannot be guaranteed because the very fact of conducting an investigation may lead employees or other persons to reach conclusions of their own. Anyone involved in an investigation under these procedures will be informed of their obligation to maintain confidentiality.

This policy encourages employees to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified.

Employees may choose to remain anonymous when submitting their complaint. Concerns expressed anonymously will be explored appropriately, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

PERSONAL RELATIONSHIPS

Consenting "romantic" or personal relationships between a supervisor/manager and an employee may at some point lead to unhappy complications and significant difficulties for all concerned - the employee, the supervisor/manager and the Company. Accordingly, the Company strongly discourages such relationships and any conduct (such as dating between a supervisor/manager and an employee) that is designed or may reasonably be expected to lead to the formation of a "romantic" or personal relationship.

By its discouragement of romantic and personal relationships, the Company does not intend to inhibit the social interaction (such as lunches or dinners or attendance at entertainment events) that are or should be an important part or extension of the working environment; the policy articulated above is not to be relied upon as justification or excuse for a supervisor's/manager's refusal to engage in such social interaction with employees.

If a romantic or personal relationship between a supervisor/manager and an employee should develop, it shall be the responsibility and mandatory obligation of the supervisor/manager to promptly disclose the existence of the

relationship to Human Resources. The employee may make the disclosure to Human Resources as well, but the burden of doing so shall be upon the supervisor/manager.

Guidelines and Determining Factors

For the purposes of this policy, a personal relationship is any intimate relationship existing between a member of AYH's management and any employee within his/her chain of command. A "management team member" is defined as any employee classified as an officer, manager, official or supervisor. "Intimate personal relationships" may be manifested as patterned associations with select individuals of the work group, romantic affairs, etc.

Upon being informed or learning of the existence of such a relationship, the Company's management may take all steps that it, in its discretion, deems appropriate. At a minimum, the employee and supervisor/manager will not thereafter be permitted to work together on the same matters (including matters pending at the time disclosure of the relationship is made), and the supervisor/manager must withdraw from participation in activities or decisions (including, but not limited to, hiring, evaluations, promotions, compensation, work assignments and discipline) that may reward or disadvantage any employee with whom the supervisor/manager has or has had such a relationship.

In addition, and in order for the Company to deal effectively with any potentially adverse consequences such a relationship may have for the working environment, any person who believes that he or she has been adversely affected by such a relationship, notwithstanding its disclosure, is encouraged to make his or her views about the matter known to Human Resources.

This policy shall apply without regard to gender and without regard to the sexual orientation of the participants in a relationship of the kind described.

WORK ENVIRONMENT

SMOKE FREE ENVIRONMENT

In keeping with the Company's intent to provide a safe and healthful work environment, smoking in the workplace is prohibited except in those locations that have been specifically designated as smoking areas. Please ask your Manager where these designated areas are located. This policy applies equally to all employees, clients, and visitors. Employees who visit or work on-site at a customer's premises are expected to follow the smoking policy for that location.

You are expected to exercise common courtesy and respect the needs and sensitivities of our clients and your co-workers with regard to the smoking policy. Smokers are expected to keep smoking areas clean and not to abuse break and work rules. In situations where the preferences of smokers and nonsmokers are in direct conflict, the preferences of nonsmokers will prevail.

HIRING OF RELATIVES

To avoid misunderstandings, complaints of favoritism, and other problems of management credibility, AYH has established the following policy concerning the hiring of relatives.

Although AYH has no prohibition against employing relatives of current employees, we require supervisor approval before hiring. We will monitor situations in which such relationships exist in the same area and in no way should there be a reporting relationship between relatives. In case of actual or potential problems, AYH will take prompt action. This can include reassignment or, if necessary, termination of employment for one or both of the individuals involved.

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

SAFETY

It is the policy of the Company to manage and conduct its operations in such a manner as to eliminate or minimize all potential hazards and to avoid accidents involving injury to personnel or damage to property. AYH will follow all applicable federal, state, local and contractual safety and health regulations, including those of federal and/or local Occupational Safety and Health programs.

All employees are charged with personal responsibility for constant adherence to safety procedures and safe practices. To achieve and maintain a safe working environment, each employee must take an active interest in safe work practices and must take responsibility for following any safety rules or recommendations.

Communications

AYH provides information to employees about workplace safety and health issues through regular internal communication channels such as department meetings, bulletin board postings, memos, or other written communications.

Making Suggestions and Reporting Violations

Some of the best safety improvement ideas come from employees. If you have ideas, concerns, or suggestions for improved safety in the workplace you are encouraged to raise them with your Manager, or with another Manager, or bring them to the attention of Human Resources.

You are expected to obey safety rules and to exercise caution in all work activities. You must immediately report any unsafe condition to the appropriate Manager. Employees who violate safety standards, who cause hazardous or dangerous situations, or who fail to report or, where appropriate, remedy such situations, may be subject to disciplinary action, up to and including termination of employment. Reports and concerns about workplace safety issues may be made anonymously if you wish. All reports can be made without fear of reprisal.

In the case of accidents that result in injury, regardless of how insignificant the injury may appear, you should immediately notify your Manager and Human Resources. Such reports are necessary to comply with laws and initiate insurance and workers' compensation benefits procedures.

WORKERS' COMPENSATION

The Government of the Virgin Islands provides a comprehensive workers' compensation program at no cost to employees. This program covers any injury or illness sustained in the course of employment that requires medical, surgical, or hospital treatment. Subject to applicable legal requirements, workers' compensation provides compensation benefits after a short waiting period. All approved medical expenses are covered immediately.

Employees who sustain work-related injuries or illnesses must inform Human Resources immediately. All employees will be provided care, first-aid and emergency service, as required, for injuries or illnesses while on Company time. Employees should contact their Manager and/or 911 in the event of an accident, injury or emergency.

No matter how minor an on-the-job injury may appear, it is important that it be reported to Human Resources immediately. This will enable an eligible employee to qualify for coverage as quickly as possible. Failure to report accidents is a serious matter as it may preclude an employee's coverage under workers' compensation insurance.

Neither AYH nor Workers' Compensation will be liable for the payment of workers' compensation benefits for injuries that occur during an employee's voluntary participation in any off-duty recreational, social, or athletic activity sponsored by the Company.

COMPANY EQUIPMENT AND VEHICLES

The Company provides supplies, equipment, vehicles and materials necessary for its employees to perform their job. These items are to be used for the Company's purposes. A Manager must authorize use of Company vehicles for personal reasons. Employees are expected to exercise care in the use of Company equipment and property and use such property only for authorized purposes.

Loss, damages or theft of Company property should be reported at once. Negligence in the care and use of Company property may be considered grounds for discipline, up to and including termination.

The Company's equipment, such as telephone, postage, facsimile and copier machine, is intended for business use. An employee may use this equipment for non-business purposes on a limited basis with the permission of his or her Manager. Personal usage of these or other equipment that results in a charge to the Company should be reported to your Manager or accounting so that reimbursement can be made.

Upon termination of employment, the employee must return all Company property, equipment, work product and documents in his or her possession or control.

Personal Vehicles used for Company Business

Only employees with an unrestricted, current driver's license and included in the Company vehicle insurance policy, may operate a vehicle to conduct Company business. This applies to all employees and applicants for employment for whom operating a motor vehicle is a regular and necessary activity of employment.

Any employee who uses a personal vehicle for any Company business must be on the approved driver list. In addition, the driver must provide a certificate of insurance that shows that they have current liability insurance. The certificate must show current coverage, and the employee may be asked to produce an updated certificate at any time. The vehicle must be in good working order.

Vehicle Safety Guidelines

All Company-approved drivers must:

- Maintain a valid driver's license and have a current insurance.
- Drive defensively and anticipate driving hazards such as bad weather and bad drivers.
- Comply with all applicable motor vehicle laws, operating regulations and registration requirements. (*Note: The use of radar detectors or similar devices while on Company business is expressly prohibited.*)
- Wear a safety belt as a driver or passenger in all vehicles used for Company business, and in any Company vehicle used for other than Company business.
- Drive without impairment by alcohol or drugs.
- Report all accidents (no matter how minor) to Human Resources immediately (i.e., the same day the accident occurs), providing full factual information about the incident. (Human Resources will need to notify the Company's insurer of accidents promptly.)
- Report any changes in the status of your driver's license (e.g., revocation or suspension, DUI, violations of law) to your Manager and Human Resources immediately.
- Avoid driving distractions to the greatest degree possible. Specifically, drivers should avoid any activity that causes them to divert their attention from driving or to drive one-handed.

Guidelines for Cellular Phone Use While Driving

Cell phone use while driving in the Virgin Islands is prohibited by law. This includes texting and messaging. If the phone must be used, a hands-free device must be used or alternatively, the driver should safely pull off the road and park the car prior to usage. Regardless of the circumstances, including slow or stopped traffic, when not using a hands-free device, employees must pull off to the side of the road and safely stop the vehicle before placing or

accepting a call. While driving, attention to the road and safety should always take precedence over conducting business over the phone.

COMPUTERS AND COMMUNICATION SYSTEMS

AYH's computer and communication resources and services are for the use of the Company and its workers.

Computer and communication resources and services include, but are not limited to: host computers, file servers, workstations, standalone computers, laptops, software, computer files, internal/external communications networks, internet, commercial online services, bulletin board systems, e-mail systems, telephone systems, long distance services, voice mail, cellular phones, pagers, video equipment, and tape that are accessed directly or indirectly.

As a user, you are responsible for using these resources and services in an efficient, effective, ethical, and lawful manner. All communications transmitted by, received from, or stored in these systems are the **sole property of the Company**. As noted above, all such communications are subject to review and monitoring by AYH. Accordingly, you should have no expectation of privacy in such communications.

The following guidelines apply to all users of computer and communication resources and services, wherever the users are located. The term "users" refers to all employees, independent contractors, and other persons or entities accessing or using Company computers and communication resources and services. The Company's Information Technology Department must approve access to any of these services by non-employees.

Violations of this policy may result in disciplinary action, up to and including possible termination, and/or legal action.

Policy

AYH has the right, but not the duty, to monitor any and all aspects of computer and communication systems used, maintained or provided in the conduct of its business, including e-mail and Internet access, to ensure compliance with its policies. Computers and computer accounts are provided to assist employees in the performance of their job. No user should have an expectation of privacy in anything created, sent, received or downloaded on the computer or communication system. The Company is not responsible for the actions of individual users.

The computer and communication systems belong to the Company and should be used for business purposes only. The Company reserves the right to monitor the operation of these systems, to access all records within them, and to retain or dispose of those records as it deems necessary. Even if you use a personal password or code to access these systems, all messages composed, sent or received are not your private property; they belong to the Company. Any technical questions about this policy should be addressed to Information Technology Management.

Users are governed by the following provisions, which apply to all use of computer and communication resources and services:

- Users must comply with all software licenses, copyrights, and all other state and federal laws governing intellectual property.
- Fraudulent, harassing, embarrassing, indecent, profane, obscene, intimidating or other unlawful material may not be sent by e-mail, downloaded by other form of electronic communication, or displayed on or stored in Company computers. If you encounter or receive such material, you should immediately report the incident to your Manager.
- AYH's computer and communication resources and services may not be used for the transmission or storage of commercial or personal advertisements, solicitations, promotions, destructive programs (viruses and/or self-replicating code), political material, obscene material or any other unauthorized or personal use.

Electronic Mail (e-mail)

The electronic mail ("e-mail") system is the property of AYH and is for use in conducting Company business. All communications and information transmitted by, received from, or stored in this system are Company records and

property of the Company. While e-mail usage is intended for job-related activities, incidental and occasional brief personal use is permitted within reasonable limits. Employees will refrain from using Company issued e-mail addresses for excessive incoming personal e-mail and/or subscriptions to e-mail lists (listservs) unrelated to individual job tasks.

Staff members should use the same care in drafting e-mail and other electronic documents as they would for any other written communication. Anything created on the computer may, and likely will, be reviewed by others. In addition, the confidentiality of any message should not be assumed. Even when a message is erased, it is still possible to retrieve that message.

AYH's e-mail and internet access systems are provided solely for business use. Communications by you through these systems are not private nor are they protected, and you should have no expectation of privacy in such communications. For security and operational purposes, AYH may monitor and/or retrieve messages, communications, material and attachments sent through these systems. Moreover, use of the internet access provided by AYH to obtain offensive or otherwise inappropriate material is completely prohibited. Likewise, you have no expectation of privacy with respect to any other information stored on any AYH computer or in any AYH work area.

AYH expects its employees to maintain organized electronic document and contact information files. Employees are not to password protect files. Employees are not to e-mail documents or materials to persons who are not authorized to receive or review such materials.

The following additional guidelines apply to the use of the Company's e-mail system:

- Employees have no right of privacy in any material stored in, created, received, or sent over the e-mail system.
- At its discretion (as owner of the e-mail system), the Company reserves and may exercise the right to monitor, access, retrieve, and delete any matter stored in, created, received, or sent over the e-mail system, for any reason and without the permission of any employee.
- Even if employees use a password to access the e-mail system, the confidentiality of any message stored in, created, received, or sent from the e-mail system still cannot be assured. Use of passwords or other security measures does not in any way diminish the Company's rights to access materials on its system, or create any privacy rights of employees in the messages and files on the system.
- Employees should be aware that deletion of any e-mail messages or files would not truly eliminate the messages from the system. All e-mail messages are stored on a central back-up system in the normal course of data management.
- Even though AYH has the right to retrieve and read any e-mail messages, those messages should still be treated as confidential by other employees and accessed only by the intended recipient. Employees are not authorized to retrieve or read any e-mail messages that are not sent to them. Any exception to this policy must receive the prior approval of management.
- The Company's policies against sexual or other harassment apply fully to the e-mail system, and any violation of those policies is grounds for discipline up to and including discharge. Therefore, no e-mail messages should be created, sent, or received if they contain intimidating, hostile, or offensive material concerning race, color, religion, sex, age, national origin, disability or any other classification protected by law.
- Do not send personal messages or jokes using the Company's e-mail. Even if the material is not offensive, you should not encourage the use of e-mail for non-business related activities. If you receive non-business related messages, jokes or related files from someone else, delete the messages and refer that person to AYH's policies. If the activities continue, contact the person's Manager.
- If you receive a chain mail message, reply to the sender asking him/her not to send junk e-mail. If the sender is a Company employee, print a copy of the message and mail the paper copy to the employee's Manager, along with a brief note explaining the policy violation. Delete the message without forwarding it to any additional users. Please note that some chain messages are disguised as warnings about viruses. Do not forward these messages.

Personal Computers and Software Applications

Before installing software onto individual computers or the network, employees must first obtain express authorization to do so from the Director of Information Systems. If the software is not a part of the standard issue, the purchase must be approved by the employee's Manager and the Director of Information Technology.

Any duplication of copyrighted software, except for backup and archival purposes, is a violation of both Company policy and federal law. Any unauthorized or unlicensed copies of software at AYH expose both you and the Company to potential civil and criminal penalties. Software must only be used according to the software license agreement. No unlicensed software may be used or installed into the Company's computers. The Company may delete any unlicensed software or personal software without notice to you.

The computer assigned to you is your responsibility. As such, it is your responsibility to take reasonable precautions to secure it from use and/or abuse by another. The following outlines some of your responsibilities and guidelines regarding computer use and security:

- You are responsible for immediately reporting any unlawful activity involving your personal computer. The data you work with may be more valuable and more difficult to replace than the hardware or software used to access it.
- Employees are responsible for safeguarding your password for the system. Individual passwords should not be printed, stored online, or given to others. You are responsible for all actions made using your password.
- To make all information stored on any computer available if needed, password protected files are discouraged. In the event password protection is needed, the employee's Manager must be made aware of the password.
- Be aware that a computer's hard drive may fail at any time. Several backup methods are available. Consult the Company Tech Support team for instructions on backing up your files or for any other questions.

Important: A user's ability to access other computer systems directly or through the network, including the Company network does not imply a right to access those systems or to make use of those systems unless specifically authorized by the operators of those systems.

Password

- Passwords are the first internal line of defense against potential hackers and hence are extremely important in ensuring network security
- The length of passwords must always be checked automatically at the time that users construct or select them. All passwords must have at least eight (8) characters. Passwords should have complexity if possible; otherwise, at a minimum, passwords must be non-trivial alphanumeric. For clarification, see the definition below for password complexity.
- Definition of password "complexity":
- Password with complexity is defined as a password that has at least one of the following character types: uppercase, lowercase, and special characters like @#%&!*
- Some examples of 8-character password with complexity: [REDACTED], Beagle1*, Sn@ggle4
- The display and printing of passwords must be masked, suppressed, or otherwise obscured so that unauthorized parties will not be able to observe or subsequently recover them.
- All users must be automatically forced to change their passwords at least once every ninety (90) days.
- All workstations used for AYH business activity, no matter where they are located, must be using an access control system approved by the Information Security Department. In most cases this will involve screen-savers with fixed-password-based boot protection along with a time-out-after-no-activity feature, which must be set to no longer than fifteen (15) minutes
- Computer access must be achieved via passwords that are unique to each individual user. Sharing of passwords is strictly prohibited and considered grounds for termination.

Internet

Internet access to global electronic information resources on the World Wide Web is provided by AYH to assist employees in obtaining work-related data and technology. While Internet usage is intended for job-related activities, incidental and occasional brief personal use is permitted within reasonable limits. The following guidelines have been established to help ensure responsible and productive Internet usage.

- All Internet data that is composed, transmitted, or received via our computer communications systems is considered to be part of the official records of the Company and, as such, is subject to disclosure to law enforcement or other third parties. Consequently, employees should always ensure that the business information contained in Internet e-mail messages and other transmissions is accurate, appropriate, ethical, and lawful.
- Data that is composed, transmitted, accessed, or received via the Internet must not contain material that could be considered discriminatory, offensive, obscene, threatening, harassing, intimidating, or disruptive to any employee or other person. Examples of unacceptable content may include, but are not limited to, sexual comments or images, racial slurs, gender-specific comments, or any other comments or images that could reasonably offend someone on the basis of race, color, age, sex, pregnancy, religious or political beliefs, national origin, citizenship, veteran status, disability, sexual orientation, or any other characteristic protected by law.
- Internet users should take the necessary anti-virus precautions before downloading or copying any file from the Internet. All downloaded files are to be checked for viruses; all compressed files are to be checked before and after decompression. Consult Tech Support for these procedures.
- Abuse of the Internet access provided by AYH in violation of law or AYH policies will result in disciplinary action, up to and including termination of employment. Employees may also be held personally liable for any violations of this policy. The following behaviors are examples of previously stated or additional actions and activities that are prohibited and can result in disciplinary action:
 - Sending or posting discriminatory, harassing, or threatening messages or images
 - Sending or posting confidential material or proprietary information outside of the organization
 - Sending or posting messages or material that could damage the organization's image or reputation

The Company reserves the right to, and does, monitor Internet usage including sites visited and time spent at those sites.

Social Networking

Blogging

Term Definition

Blogging Writing a blog. A blog (short for weblog) is a personal online journal that is frequently updated and intended for general public consumption. Social networking sites such as Facebook, MySpace and Twitter are considered "Blogging".

1. Blogging by employees, whether using AYH's property and systems or personal computer systems, is also subject to the terms and restrictions set forth in this Policy. Using the Company's systems to engage in blogging is unacceptable.
1. AYH's Confidential Information policy also applies to blogging. As such, Employees are prohibited from revealing any confidential or proprietary information, trade secrets or any other material covered by the Company's Confidential Information policy when engaged in blogging.
2. Employees shall not engage in any blogging that may harm or tarnish the image, reputation and/or goodwill of AYH and/or any of its employees. Employees are also prohibited from making any discriminatory, disparaging, defamatory or harassing comments when blogging or otherwise engaging in any conduct prohibited by the Company's Non-Discrimination and Anti-Harassment policy.
3. Employees may also not attribute personal statements, opinions or beliefs to the Company when engaged in blogging. If an employee is expressing his or her beliefs and/or opinions in blogs, the employee may not,

expressly or implicitly, represent themselves as an employee or representative of AYH. Employees assume any and all risk associated with blogging.

4. Apart from following all laws pertaining to the handling and disclosure of copyrighted or export controlled materials, AYH's trademarks, logos and any other AYH intellectual property may also not be used in connection with any blogging activity.

Telephones and Voice Mail

The telephone system is the property of the Company and, as such, the primary purpose is for the conduct of the business of the Company. Employees are required to reimburse the Company AYH for any charges resulting from their personal use of the telephone.

To ensure effective telephone communications, employees should always use the approved greeting and speak in a courteous and professional manner. Please confirm information received from the caller, and hang up only after the caller has done so.

The voice mail system is intended to send and receive business-related messages. It is not designed as a storage medium for these or personal messages. Voice mail messages should be checked and cleared daily. Saving multiple voice messages for an extended period of time can negatively impact system performance.

AYH reserves the right to monitor its voice mail system to ensure compliance with this policy. You should not have an expectation of privacy with respect to the voice messages you send or retrieve via the Company's voice mail system.

SECURITY

Security is the responsibility of all employees. Security safeguards are necessary to help protect you, your property and the property of the Company.

Guarding Your Personal Belongings

To guard against theft of your personal belongings, be sure to keep your wallet, purse and/or any other valuables in a safe place, and keep your car locked. AYH discourages you from keeping personal property in the workplace and will not assume responsibility for the loss of such property.

Security Checks

The inspection of packages, lockers, cabinets and drawers, handbags, briefcases, carrying cases and vehicles may be necessary at times, and AYH reserves the right to search an employee's personal property. As an employee of AYH, you are expected to reasonably comply with any Company investigations.

Employees are not permitted to remove any Company property or merchandise from the premises for any reason unless preapproved in writing by your Manager.

Entering and Leaving the Premises

At the time you are hired, you will be advised of the proper procedures for entering and exiting your workplace and setting alarms. You are expected to abide by these guidelines at all times. If you do not receive this information upon starting work, please contact a Manager or Human Resources immediately. Employees are expected to be mindful of security concerns and abide by security guidelines at all times. Failure to comply with this policy may result in disciplinary action, up to and including termination.

Parking

It is advisable to remove valuables and lock your car because the Company does not assume responsibility for theft or property damage involving employee's automobiles.

Parking may be restricted and/or assigned in certain situations. Ask your Manager for instructions.

Visitors in the Workplace

To provide for the safety and security of employees and the facilities at AYH, only authorized visitors are allowed in the workplace. Restricting unauthorized visitors helps maintain safety standards, protects against theft, ensures security of equipment, protects confidential information, safeguards employee welfare, and avoids potential distractions and disturbances.

All visitors should enter the property through the common areas and must check in at the Reception area. Visitors will be given a security clearance, which may include a security badge, receive directions or be escorted to the appropriate destination. Employees are responsible for the conduct and safety of their property visitors.

If an unauthorized individual is observed on Company premises, employees should immediately direct the individual to the reception area, or if necessary notify a Manager and/or Security.

Violence in the Workplace

AYH does not tolerate fighting, threats and other acts of violence against employees, co-workers, job applicants, clients or vendors. In addition, possession of firearms, weapons, ammunition or explosives on Company property or while on Company business is strictly prohibited.

Acts or threats of violence or physical harm, whether made directly or indirectly, violate the safe and professional conduct of our business. If you are subjected to or threatened with harm by a co-worker, customer or vendor, or if you become aware of another individual who has been subjected to or threatened with violence, or if you know of circumstances which might result in violence, you should report this information to your Manager or Human Resources immediately.

Please bring all threats to our attention so that we can deal with them appropriately. Do not assume that any threat is not serious. Any investigation into threatening remarks or conduct will be conducted with as much confidentiality as possible. No adverse action will be taken against anyone who brings a good-faith complaint under this policy.

Reporting Illegal and Unethical Acts

If you have knowledge of or suspect any illegal behavior by another employee, you are required to report such activity immediately to management.

PARTICIPATION IN COMMUNITY AFFAIRS

We encourage you to participate in community service affairs of charitable, educational and civic organizations. However, your participation in these activities must not adversely affect job performance, be detrimental to AYH's interests, or place you in the position of serving conflicting interests.

Time spent on community affairs, when not undertaken at the request of management, should normally be outside of your regular working hours and therefore will not be considered hours of work for pay purposes. Employee-initiated participation in community affairs that involves an extended period of time away from the job must be approved and handled in accordance with the Company's leave of absence policies.

EMERGENCY CLOSURES

At times, emergencies such as severe weather, fires, power failures, earthquakes or hurricanes can disrupt Company operations. As you might expect, it is important for us during such times to protect the facility and assist our clients with their needs in these emergencies. For this reason, all employees are advised that it is their duty to report as scheduled unless they are specifically instructed otherwise by their managers. All employees may be called upon to work beyond their scheduled shifts to assist with emergency preparations. In extreme cases, these circumstances

may require the closing of a work facility. If such conditions exist, please call the appropriate location for a message or contact your Manager at home or at work as soon as possible.

When operations are officially closed due to emergency conditions, the time off from scheduled work for salaried employees and full time hourly employees will be paid.

In cases where an emergency closing is not authorized, employees who fail to report for work will be required to use vacation or take the time off without pay.

ENVIRONMENTAL

It is the policy of AYH to comply with all applicable laws and regulatory standards promulgated by the government to protect the quality of the environment. This includes eliminating or controlling pollution to the air, water or land, and minimizing potential exposure to hazardous materials.

It is the responsibility of each employee to be familiar with the requirements of his/her type of work and be sure that the work does not have any unnecessary impact on the environment. Employees are expected to recycle any materials for which collection services are provided.

Any person who becomes aware of any spill or inadvertent release of toxic or hazardous materials must report the incident immediately to his/her Manager.

PAY RELATED INFORMATION

COMPENSATION

AYH's goal is to compensate its employees in a fair and competitive manner, based on the responsibilities of each job, the Company's overall growth and performance, and other business conditions affecting wages. In addition, our goal is to reward employees for their individual performance, achievements and contributions to the Company's success.

After the first year of employment, wages and salaries are normally reviewed annually, but a review does not guarantee an increase. Our philosophy is to pay for performance, and pay increases are based solely upon individual merit and business conditions.

EMPLOYMENT CATEGORIES

Exempt/Nonexempt

Under the Fair Labor Standards Act, there are two categories of employees – exempt and nonexempt.

- **Exempt employees** are classified as such if their job duties are exempt from the overtime provisions of the Federal and State Wage and Hour Laws. Exempt employees are not eligible for overtime pay. Exempt employees generally include those in executive, managerial, professional, commissioned sales, and certain administrative positions. If you are an exempt employee, you are normally paid on a salary or commission basis regardless of hours worked. Exempt employees' salaries are calculated on a weekly basis.
- **Nonexempt employees** must keep records of their hours worked and must be paid overtime for any hours over 8 hours in a workday, or over 40 hours in a work week, and in accordance with local laws. Their wages are calculated on an hourly basis.

At the time you are hired, your position is categorized as regular full-time, regular part-time, or seasonal. At that time you will be informed of any Company benefits for which you are eligible. In general employment category definitions encompass the following:

Full-Time

A full-time employee is one who works the standard working hours of the Company each week 30 to 40 hours. Full time employees are classified as exempt or non-exempt under FLSA (Fair Labor Standards Act) guidelines and receive appropriate over-time pay based on their individual job classification and the hours worked.

Part-Time

Part-time employees are classified as non-exempt and work a regular schedule less than 30 hours per week.

Seasonal Employees

Seasonal employees are generally hired for a time of limited duration less than 180 days.

TIME KEEPING AND PAY RECORDS

The attendance of all employees must be recorded and submitted to the Payroll Department weekly through the designated timekeeping system. The payroll week begins on Saturday and ends on Friday.

Attendance records are Company records and care must be exercised in recording the hours worked, overtime hours, absences and business expenditures.

Meal Periods and Breaks

All full-time, non-exempt, salaried and hourly employees are generally provided with one unpaid meal period each workday. Employees are relieved of all active responsibilities and restrictions during meal periods and will not be compensated for that time.

Your supervisor will inform you regarding the location of your break areas, as well as when and for how long you may take meal breaks.

Since meal breaks are not part of your working hours, you are not paid for them since you are required to clock out for lunch/dinner breaks. Even if you don't leave the premises, you should not perform any work during your meal break. You are permitted one fifteen-minute break per four hours worked without the need for clocking out, and you will be paid for that time. Remember, though, that your supervisor will determine the length and frequency of your breaks.

Breaks are to be confined to designated areas. Relaxing, eating, drinking, and smoking in public areas, in the presence of customers, etc., is prohibited.

Timekeeping

All non-exempt salaried or hourly employees must record all hours worked including paid time off, and have their Manager approve the completed timesheet weekly. All exempt salaried employees are required to report all paid time off through the designated timekeeping system after receiving their Manager's approval.

Time Records

It is of utmost importance that timesheets are filled out properly and correctly.

The following rules apply to completing time records:

- You are not permitted to work "off the clock," including working through meal breaks or after scheduled work hours.
- You must accurately record all hours you spend on the job performing assigned duties.

- You must record your own time. You are not permitted to record the time of another employee, and no employee is permitted to record your time for you.
- You are not authorized to work through scheduled lunch or meal breaks without prior approval of your Manager.
- Compensatory time off in lieu of overtime pay is not permitted.

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

WORK HOURS

Your Work Schedule

The normal work schedule for most full-time employees is 8 hours a day 5 days per week, or 40 hours a week. Managers will advise employees of the times their schedules will normally begin and end. Staffing needs and operational demands may necessitate variations in starting and ending times, include weekends and holidays, as well as variations in the total hours that may be scheduled each day and week. The work week is Saturday through Friday.

Employees with scheduling concerns are encouraged to discuss them with their managers as far in advance as possible. Issues such as staffing needs, the employee's performance, and the nature of the job will be considered when establishing work schedules.

Overtime

When operating requirements or guest needs cannot be met during regular working hours, employees will be given the opportunity to volunteer for overtime work assignments. If there are not enough employees who volunteer for overtime assignments, employees may be required by their Manager to work overtime. **All overtime must be pre-approved by your Manager.** Overtime assignments will be distributed as equitably as practical to all employees qualified to perform the required work.

Non-exempt employees will be paid time and a half of the regular hourly rate for all hours worked over 8 hours each day and for over 40 hours in any work week.

No Call /No Show

Employees at AYH are required to call in to their Manager or as designated by the call in procedure, when they cannot report to work. **Leaving a message on voice mail or text is not sufficient.** Any time an employee does not call in or report to work, it is considered a "no call/no show" situation. The first instance of a "no call/no show" will result in a written warning. The second separate offense may result in termination of employment with no additional disciplinary steps. Any "no call/no show" lasting three days is considered job abandonment and will result in the termination of employment.

PAY PROCEDURES

AYH takes all reasonable steps to ensure that employees receive the correct amount of pay in each paycheck and that employees are paid promptly on the scheduled payday. You should review your paycheck immediately, and if you believe there are any errors, you must bring them to the attention of your Manager right away.

Each paycheck will include earnings for all work performed through the end of the previous payroll period.

In the event that a regularly scheduled payday falls on a holiday, employees will receive pay on the last day of work before the regularly scheduled payday.

It is the Company's policy that employee paychecks will only be given personally to that employee. All other arrangements for mailing or pick-up must be made with the employee's Manager.

Direct Deposit/Payroll Check

AYH prefers and encourages employees to be paid through direct deposit of funds to either a savings or checking account at the bank of your choice. This can be set up during the "on-boarding" process.

Due to banking requirements, it may take several working days for activation of the direct deposit. You will receive a direct deposit pay stub with all your earnings and deductions.

Final Pay

Upon separation, you will receive all unpaid wages and pay for any accrued but unused vacation time off in a manner consistent with the law in the location in which you work. Any vacation days taken in excess up to your last day of employment, will be off-set with any payments due to you.

BUSINESS-RELATED EXPENSE REIMBURSEMENT

Your duties as an employee may require you to travel. The Travel and Expense Policies set the guidelines on acceptable travel and business expenses, expense reports and the approval process. All expenses should cover the employee's actual reasonable expenses while conducting business away from home on behalf of the Company or as associated with a business event. No personal expense should ever be charged to the Company. You are responsible to know the limits of the Travel and Expense Policy and seek the proper advanced approval through your direct supervisor within your division.

When travel is completed you should submit your travel expenses as soon as possible on the expense report along with all original receipts. For further information, review the Travel and Expense Policy.

Travel

Employees whose travel plans have been approved are responsible for making their own travel arrangements.

Employees who are involved in an accident while traveling on business must promptly report the incident to the Human Resources. Vehicles owned, leased, or rented by the Company may not be used for personal use without prior approval.

With prior approval, employees on business travel may be accompanied by a family member or other person, when it will not interfere with successful completion of business objectives. Generally, employees are also permitted to combine personal travel with business travel, as long as time away from work is approved. Additional expenses arising from such non-business travel are the responsibility of the employee.

Employees should contact their Manager for guidance and assistance on procedures related to travel arrangements, expense reports, reimbursement for specific expenses, or any other business travel issues.

Abuse of this business travel expenses policy, including falsifying expense reports to reflect costs not incurred by the employee, can be grounds for disciplinary action, up to and including termination of employment.

PROFESSIONAL MEMBERSHIPS

Professional employees are encouraged to become members in Professional Organizations and to actively participate.

With management approval, the Company will pay membership dues and other employee fees for professional memberships if the membership is beneficial to both you and the Company.

TRAINING

Conferences, Short Courses, Seminars

AYH may pay 100% of the cost for job related approved conferences, short courses and seminars. All attendees must have prior written approval by the General Manager and the President.

Employees are encouraged to become actively involved with professional associations to promote AYH as well as gain exposure by serving on boards, as officers, and by presenting technical papers.

EDUCATIONAL ASSISTANCE

The Company encourages self-improvement and lifelong learning. You are encouraged to investigate, and where appropriate and possible, participate in outside seminars, vocational courses, and academic courses for self-improvement.

Tuition Reimbursement Program

Eligible employees shall be reimbursed for work-related courses at the University of the Virgin Islands, provided these have been **pre-approved in writing by the General Manager**. The employee will receive 100% reimbursement for obtaining an A grade and 75% reimbursement for a B. If the employee obtains a grade C or less, no reimbursement will be made for tuition expenses.

BENEFITS

GENERAL OVERVIEW OF BENEFITS

AYH has established a variety of programs designed for the benefit of employees, including time off from work, assisting you in covering costs that can result from illness, helping you plan for an unexpected disability and several other benefits. This Handbook contains only a general listing of benefits. Your rights can be determined only by referring to the full text of the official plan documents, which are controlling and are available from Human Resources. To the extent that any of the information contained in this Handbook is inconsistent with the official plan documents, the provisions of the official plan documents will govern in all cases.

The following are some of the benefit programs that are available to eligible employees:

- Medical Insurance/Dental/Vision
- Holiday Pay
- Vacation
- Sick Leave
- Personal Leave
- Retirement Account (SEP)
- Life Insurance/Accidental Death and Dismemberment
- Leaves of Absence
- Family and Medical Leave (if applicable)

ELIGIBILITY FOR BENEFITS

At the time you are hired, you are categorized as a regular full-time, regular part-time, or seasonal employee and will be informed at that time of any Company benefits for which you are eligible. If you do not receive this information upon starting work or if you have some question as to your employment status and/or your eligibility for benefits, you should contact Human Resources immediately.

Enrollment

If you are eligible for benefits you will be provided a benefit booklet stating benefits for the current year. You will be asked to select benefit coverage during your initial hiring process as well as annually during open enrollment.

Important: If you do not elect coverage within the first 30 days of your eligibility date you cannot enroll in benefits until the next open enrollment period unless you have a qualifying event.

Changes and Qualifying Events: You must notify Human Resources if you experience a **qualifying event** and want to make a change to your existing medical plan.

A qualifying event includes:

- Legal separation
- Divorce
- Death
- Termination of other employment
- Loss of other coverage
- Marriage
- Birth
- Dependent changes (for example: student status)
- Adoption or placement for adoption

You must request enrollment within 30 days of any of these qualifying events. Please understand that you will not be entitled to special enrollment if loss of coverage is the result of failure to request enrollment.

Details of all insurance plans are described in the benefit booklet. The information on cost of coverage will be provided in advance of enrollment to eligible employees.

If a termination should occur, employees may be eligible for continuation of certain insurance coverage as described in the plan documents. Contact Human Resources for more information about insurance benefits. .

RETIREMENT PLAN

AYH has a SEP (Simplified Employee Pension) retirement plan to provide employees the potential for future financial security for retirement.

Eligible employees are subject to all terms and conditions of the Official Plan Documents. If you have questions about specifics of the Plan Documents, you should contact Human Resources.

BONUSES

AYH employees are eligible for company incentive programs such as the discretionary bonus pool (when applicable). If you have any further questions about these incentives please contact your Manager or Human Resources.

HOLIDAYS

AYH grants holiday time off to all regular full-time eligible employees for holidays. An accurate holiday list will be circulated at the beginning of each calendar year.

If a Company-recognized holiday falls on a weekend, the holiday will be observed on the closest Friday or Monday as directed by the Company.

The Company recognizes and provides holidays for its employees. Our customers may require our services even on holidays and depending on the business situation employees may be required to take an alternate day off.

VACATION

Vacation time is available to eligible employees to provide opportunities for rest, relaxation, and personal pursuits. Full-time employees are eligible to take vacation as described in this policy. Part Time and seasonal employees are not eligible for vacation.

Annual vacation for the calendar year is credited to an employee's vacation account on the first day of each year based on their tenure as of the first day of each calendar year. The full allocation is available at that time. However, despite being allocated in full at that time, **vacation time is still calculated on a monthly accrual basis depending on your total yearly entitlement.** Therefore, if an employee is allotted 10 vacation days on January 1, and takes a total of 10 days between January and June, but their employment is terminated (voluntarily or involuntarily) on June 30, the employee will need to pay back 5 of those vacation days since only 5 will have accrued by the end of June.

During the first year of employment, an employee accrues vacation as set forth below. After the employee's 3rd month in service, the employee is eligible to schedule and take vacation as it accrues.

Annual vacation allocation rates are determined by length of service and are allocated as follows:

LENGTH OF SERVICE	DAYS OF VACATION ALLOCATED ANNUALLY
1 st Calendar Year	Accrued per month (beginning 1 st day of employment) Cannot take vacation until 90 days from employment.
2 nd Calendar Year to 4 years of service	10
5 through 9 years	15
10 years and up	20

Other Vacation Time Considerations

Vacation must be scheduled to avoid conflicts with other employees' vacations and work demands of the Company.

1. Vacation time may be taken in half-day increments.
2. **Specific vacation dates must be approved by the employee's Manager/Supervisor and the General Manager at least four weeks prior to the anticipated vacation and within Company policies.**
3. In the case of separation from the Company after six months of employment, an individual will be paid for unused **accrued** vacation time.
4. Designated Company holidays will not be counted as vacation time if they should fall within the vacation.
5. Vacation days do not carry over into the next year. Only under special circumstances associated with needs of the business, a maximum of 5 days of vacation can be carried over to the next year if pre-approved by the EVP of Operations.
6. Cash payment in lieu of vacation time is not available.
7. Vacation time will be scheduled in the mutual best interest of the Company and the employee -- we feel that paid time off from work is necessary and should not be forfeited. The Company shall set forth procedures for scheduling employee vacations to avoid conflicts with schedules.

PERSONAL DAYS

Regular full-time eligible employees are entitled to 3 personal days per calendar year to celebrate days of personal significance. The number of personal days provided is prorated for each full month worked depending on your start date.

Requests for personal days must be made to your supervisor and approved by the General Manger at least one week before requested time off.

Personal days do not carry over into the next year.

SICK DAYS

In the interest of the physical wellbeing of employees and of the firm's productivity, the Company has instituted a generous sick leave policy. Sick days are provided to regular full-time employees for use in the event of absence from work due to personal medical needs, to care for a sick family member, and for doctor's appointments.

Eligibility

Sick leave accrual is based on your employment status and commences as of the first day of employment. Full-time employees are entitled to 6 sick days per calendar year, with the first year's allotment being calculated per month worked. Part-time and seasonal employees do not accrue sick leave.

Sick leave benefits are calculated based on your base pay rate at the time of absence and do not include any special forms of compensation, such as incentives, commissions, bonuses, or shift differentials.

Sick days do not carry over into the next year.

Using and Scheduling Sick Time

You may begin using accrued sick time as it is earned. Sick time may be used in increments of **one hour for hourly employees and half days for salaried employees**. Obviously, advance notice is usually not possible for illness, injury or personal emergencies. In the event of an unexpected absence, follow the guidelines listed in the Attendance section of this Handbook. **You must speak to your immediate supervisor or other designated persons.** Do not leave a leave a voice message or text message. A list of designated persons will be provided to you. If you are not able to report to work due to illness, a statement from your doctor may be required upon your return to work.

Extended Leaves of Absence

As an additional condition of eligibility for sick leave benefits, an employee on an extended absence must apply for any other available compensation and benefits, such as workers' compensation. Sick leave benefits will be used to supplement any payments that an employee is eligible to receive from state disability insurance, workers' compensation, or any-provided disability insurance programs. The combination of any such disability payments and sick leave benefits cannot exceed the employee's normal weekly earnings.

Upon Separation

Upon separation of employment, employees will not be paid for any accrued, unused sick time or personal days.

LEAVES OF ABSENCE

Family and Medical Leave (FMLA)

AYH may provide employees with a leave of absence to deal with serious medical problems and related disability or

inability to work. Wherever applicable, it is the intention of the Company to comply with and conform to the provisions of the federal Family and Medical Leave Act ("FMLA"). AYH will allow employees who have a minimum of 12 months of service and who have worked at least 1,250 hours during the 12 months prior to the requested leave, to take job-protected leave a total of 12 weeks during a rolling 12-month period, for certain reasons or up to 26 weeks for military caregiver leave.

FMLA leave may be available for:

- The birth and care of a newborn child
- Placement of a child with an employee for adoption or foster care
- When an employee is needed to care for an immediate family member (child, spouse or parent) with a serious health condition, as defined by the FMLA, or
- For an employee's own serious health condition, as defined by the FMLA, which makes him/her unable to perform the essential functions of his/her job.
- For Qualifying exigency leave for families of members of the National Guard or Reserves or of a regular component of the Armed Forces when the covered military member is on covered active duty or called to covered active duty.
- For military caregiver leave to care for a covered service member with a serious injury or illness.

Up to 26 weeks of leave is allowed for caring of an injured/recovering service member. A caregiver is defined as any family members defined using the current FMLA as well as "next of kin" – nearest blood relative to the individual.

In certain cases, leave may be taken on an intermittent basis rather than all at once. **Vacation and holiday benefits are not applied or allotted during unpaid FMLA leave.**

To apply for FMLA leave, employees must submit a written request at least 30 days in advance of a foreseeable leave, or as soon as practicable if the need is unforeseeable. Medical certification is required for leaves involving a serious health condition of the employee or an immediate family member, and must be provided to AYH within 15 days of AYH's request for medical certification.

The maximum allowable FMLA leave is 12 weeks (including any paid leave) during a rolling 12-month period or 26 weeks for military caregiver leave. **FMLA leave will be unpaid.** **The Company does require the use of applicable and available paid leave (e.g., vacation, personal, sick, STD, etc.) at the beginning of the FMLA leave, prior to the use of unpaid leave. All types of leave, paid or unpaid, for which an absence qualifies will run concurrently and will count against the maximum 12/26-week amount of FMLA leave.** For example, if an employee is out for a total of nine weeks based on his/her own serious health condition, and the employee uses one week (five days) of PTO at the beginning of the leave and eight weeks (40 days) of STD leave for weeks two through nine, he/she will have used nine weeks of FMLA leave (leaving three more weeks of FMLA leave during that rolling 12-month period), one week of PTO, and eight weeks of STD.

Outside employment during your FMLA leave period is prohibited and may result in disciplinary action up to and including immediate termination.

Subject to some exceptions (e.g., elimination of job altogether, etc.), employees able to return to work before or at the conclusion of the 12/26-week FMLA leave generally will be reinstated to their same position, or to a position with equivalent pay and benefits. There is no guarantee of reinstatement after 12 weeks have elapsed. If an employee is unable to return to work after 12 weeks of FMLA leave, he/she generally will be terminated.

The above FMLA policy is a summary; to view AYH's full FMLA policy contact Human Resources. To request FMLA leave, employees should contact the Human Resources Department.

Extended Leave of Absence Due to Illness or Injury (Non-FMLA)

As an additional condition of eligibility for PTO (paid time off) leave benefits, an employee on an extended absence must apply for any other available compensation and benefits, such as workers' compensation. PTO benefits will be

used to supplement any payments that an employee is eligible to receive from state disability insurance, or workers' compensation. The combination of any such disability payments and PTO leave benefits cannot exceed the employee's normal weekly earnings.

Personal Non-FMLA Leave of Absence

AYH may provide leaves of absence without pay to eligible employees who wish to take time off from work duties to fulfill personal obligations.

As soon as eligible employees become aware of the need for a personal leave of absence, they should request a leave providing a full explanation of the circumstances, in writing, from their Manager at least two weeks before the start date of the leave of absence.

Personal leave of absence is provided without pay. Any available paid time off must be exhausted first.

Duration of Leave

Personal leave may be granted for a period of up to 90 calendar days every 3 years. If this initial period of absence proves insufficient, consideration will be given to a written request for a single extension of no more than 90 calendar days. Any employee who fails to return to work or does not follow the appropriate call-in procedures at the termination of a scheduled personal leave will be considered to have voluntarily terminated his or her employment at AYH and appropriate steps will be initiated to terminate employment.

Requests for Leave

Requests for personal leave will be evaluated based on a number of factors, including anticipated workload requirements and staffing considerations during the proposed period of absence. Personal leave will not be granted if it places an undue burden on your department, or if it conflicts with work schedule demands.

Benefits during Leave

Subject to the terms, conditions, and limitations of the applicable plans, health insurance benefits will be provided by AYH until the end of the month in which the approved personal leave begins. Subject to the terms, conditions, and limitations of the applicable plans, at that time, the Company may continue to pay Company-paid benefits; you must pay 100% of their portion of insurance premiums in advance to the Company. Failure to pay this portion up front would result in a loss of benefits.

When you return from personal leave, benefits will again be provided by AYH according to the applicable plans.

Benefit accruals, such as vacation or holiday benefits, will be suspended during the leave and will resume upon return to active employment.

Other Employment

Outside employment during your leave period is prohibited and may result in disciplinary action up to and including immediate termination.

Reinstatement

When a personal leave ends, every reasonable effort will be made to return you to the same position, if it is available, or to a similar available position for which you are qualified. However, AYH cannot guarantee reinstatement in all cases.

If you fail to report to work promptly at the expiration of the approved leave period, AYH will assume you have resigned.

OTHER TYPES OF LEAVE

Bereavement Leave

Full-time employees are allowed up to 3 days off with pay in the event of a death in the immediate family. Please notify your Manager as soon as possible if you need to take bereavement leave.

For the purposes of this policy, immediate family is defined as father, mother, sister, brother, spouse, child, step-child, mother-in-law, father-in-law, grandparents, grandchildren, nieces, nephews, sisters-or-brothers-in-law.

Time off without pay may be granted at the discretion of your Manager to attend the funeral of other relatives or friends. You have the option of using any available paid time off in these instances.

Jury Duty/Court Duty

AYH encourages employees to fulfill their civic responsibilities by serving jury duty or appearing in court as a witness when subpoenaed. Full-time employees may request up to 3 weeks of paid jury/court duty leave over any 2-year period.

Pay Considerations

Jury/court 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, minus the jury duty pay awarded by the court.

Procedures

Employees must show the jury duty summons or subpoena to their Manager as soon as possible so that the Manager may make arrangements to accommodate their absence. Of course, employees are expected to report for work whenever the court schedule permits.

While on jury duty, and particularly while on standby status, you are expected to work as much of your regularly scheduled workday as the jury duty reasonably permits. In the event you are excused from jury duty on a scheduled workday, you are required to contact your Manager and be prepared to report to work as soon as possible.

Either AYH or the employee may request an excuse from jury duty if, in the Company's judgment, the employee's absence would create serious operational difficulties.

AYH will continue to provide health insurance benefits for the full term of the jury/court duty absence. Paid time off and holiday benefits will continue to accrue during jury/court duty leave.

Voting in Elections

The Company encourages all employees to exercise their civic duty and vote in elections. AYH provides two hours of paid leave so that all qualified employees may vote in any primary, general or special election. All leaves for the purposes of voting should take place at the beginning or the end of an employee shift or reporting period and must be approved in advance by your supervisor. Exceptions to this rule will apply when accommodations of multiple requests for voting time leave hampers the discharge of duties or otherwise interferes with smooth business operations. If this is the case, the appropriate supervisor or manager will schedule employees to vote on a rotating basis. Employees must communicate the intent to vote in advance to Management for purposes of scheduling.

Military Leave

AYH will grant a military leave of absence without pay to an employee who is inducted into the armed forces or who has reserve duty or National Guard obligations. Upon completion of duties, you will be reinstated into your former position or into another position of equal pay and status, consistent with applicable laws.

Annual Military Training

If you participate in annual military training, AYH will supplement your pay for your short term of service to equate to your weekly payroll, you may also apply any available PTO to the leave if you wish; however, you are not obligated to do so. You must notify your Manager and Human Resources of any such obligations as far in advance as possible so arrangements can be made.

**ACKNOWLEDGMENT OF RECEIPT OF HANDBOOK and
DISCLAIMER OF CONTRACT**

I,

ACKNOWLEDGE AND AGREE TO THE FOLLOWING:

1. I HAVE RECEIVED A COPY OF THE AMERICAN YACHT HARBOR (“AYH”) EMPLOYEE HANDBOOK (“HANDBOOK”).
2. I UNDERSTAND AND AGREE THAT NOTHING IN THE EMPLOYEE HANDBOOK CREATES, OR IS INTENDED TO CREATE, A PROMISE OR REPRESENTATION OF CONTINUED EMPLOYMENT. FURTHERMORE, I ACKNOWLEDGE THAT THIS HANDBOOK IS NEITHER A CONTRACT OF EMPLOYMENT NOR A LEGAL DOCUMENT. I UNDERSTAND AND AGREE THAT EMPLOYMENT AND COMPENSATION MAY BE TERMINATED FOR ANY LAWFUL REASON WITHOUT NOTICE AT ANY TIME BY AYH OR ME.
3. I HAVE READ THE HANDBOOK IN ITS ENTIRETY. I UNDERSTAND THAT I AM OBLIGATED TO COMPLY WITH ALL OF THE POLICIES AND PROCEDURES CONTAINED IN THE HANDBOOK AND THAT ANY FAILURE BY ME TO ABIDE BY THOSE POLICIES AND PROCEDURES MAY RESULT IN DISCIPLINARY ACTION AGAINST ME INCLUDING, BUT NOT LIMITED TO, MY EMPLOYMENT BEING TERMINATED.
4. THE HANDBOOK IS A SUMMARY OF A FEW OF THE POLICIES AND PROCEDURES THAT GOVERN EMPLOYEES.
5. THE HANDBOOK SUPERSEDES AND REPLACES ALL PREVIOUSLY ISSUED HANDBOOKS.
6. AYH MAY REVISE THE POLICIES OR PROCEDURES IN THE HANDBOOK, IN WHOLE OR IN PART, AT ANY TIME, WITH OR WITHOUT NOTICE.

THE ONLY REPRESENTATIVES OF AYH AUTHORIZED TO ENTER INTO AN EMPLOYMENT CONTRACT OR OTHERWISE CHANGE THE NATURE OF MY EMPLOYMENT ARE THE EVP OF OPERATIONS, OR THE PRESIDENT OF ITS AFFILIATE, ISLAND GLOBAL YACHTING.

EMPLOYEE’S NAME (PLEASE PRINT)

WITNESS

EMPLOYEE’S SIGNATURE

DATE