



WORKING AT GRANICUS

U.S. EMPLOYEE HANDBOOK

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INTRODUCTION

This Employee Handbook ("Handbook") will familiarize employees with the practices, policies, plans, programs, and procedures of Granicus, LLC and any subsidiaries, affiliates or parent entities (together, "Granicus") relating to work and pay. The Time Off Supplement, the Employee Benefits Supplement, and any location-specific Supplements that apply to certain employees (collectively, "Supplements") provide a general overview of Granicus's approach to time off, employee benefits, and address certain location-specific matters, respectively, and are attached and/or are hereby incorporated by reference. To the extent a Granicus Policy or procedure is not incorporated by reference into this Handbook, compliance with all Granicus Policies and Procedures is mandatory.

The Handbook and Supplements apply to all employees and contractors where appropriate and in compliance with applicable law.

It is the responsibility of each employee to read the Handbook and Supplements carefully, be familiar with their contents, and keep them handy for future reference. Any questions or issues should be discussed with supervisors or with Human Resources as soon as they arise. The Handbook and Supplements supersede all previous employee handbooks, memoranda, emails, or other communications dealing with the subject matter addressed in the Handbook and Supplements. The statements made in the Handbook and Supplements are not intended to, and do not, constitute a contract. Granicus reserves the right to amend, suspend, terminate, deviate from, add to, or supersede any practice, policy, plan, program, or procedure at any time with or without notice. Employment with Granicus is at-will, which means that Granicus retains the right to end employment of any individual at any time, for any reason, with or without cause or notice. Statements in the Handbook and Supplements or in any other Granicus publication are not to be construed as affecting or modifying in any way the at-will status of Granicus employees. No statement, written or oral, or other communication establishing employment for a specific period or under particular terms or conditions (including without limitation terms addressing compensation, benefits or severance rights), or otherwise altering the at-will status of a Granicus employee, will be enforceable unless it is in a written agreement signed by the CEO of Granicus. In the event a Granicus employee works in a state that provides greater benefits or protections to the employee than what is identified in the Handbook and Supplements, the applicable state law(s) applies.

The Handbook and Supplements are the property of Granicus and constitute Granicus confidential and proprietary information. Physical copies must be returned, and digital copies must be deleted upon request or upon termination of employment with Granicus. Granicus may request confirmation that all digital copies of the Handbook and Supplements have been deleted.

OPEN DOOR

Granicus encourages employees to bring forward any concerns or complaints they may have regarding their employment. Initially, employees should raise any concerns with their supervisor. If any employee is not satisfied with the outcome of any issue, the employee should direct concerns to Human Resources. If any employee is still not satisfied with any particular issue, the employee may bring the concern to the CEO of Granicus.

Concerns relating to unlawful discrimination or harassment should be addressed through the complaint procedure set forth in the Reporting Inappropriate Conduct section in the Granicus Code of Ethics and Conduct.

AT-WILL EMPLOYMENT

Employment with Granicus is at-will and entered into voluntarily, which means that any employee is free to resign at any time, for any reason, with or without notice. Similarly, Granicus is free to terminate the employment relationship at any time, for any reason, with or without notice.

Nothing in this employee handbook creates or is intended to create an employment agreement, express or implied. Nothing contained in this or any other document provided to the employee is intended to be, nor should it be, construed as a contract that employment or any benefit will be continued for any period of time. In addition, no one has authority to alter the at-will relationship, other than in writing signed by the CEO of Granicus.

DRESS CODE

Granicus' dress code is a reflection of our values and culture. While our style is relaxed, we do recognise awareness of our surroundings remains an important cornerstone in how we present ourselves to our customers, colleagues, prospects and candidates.

As a company our dress code is *"dress for your day. Be comfortable without making others uncomfortable. Use good judgment."*

Bringing the Granicus Dress Code to Life

When thinking what to wear for work, consider the following:

- Who are you meeting throughout your day? Are they internal only, external or blended?
- If you're meeting people, what is the purpose and intended outcome?
- What is the nature of your interactions? Are you heading into a formal situation or an informal situation?
- Will your attire help build strong rapport with those you engage?

- How will you engage with people? Virtual, or in-person?
- Are you in public representing Granicus – e.g., trade meetings/fairs, work social events, visiting customers?
- What impression do you want the other person to walk away with?

Stipulated Attire

Some employees may on occasion be required to wear a specific style of attire for certain events and situations. Examples of these situations can include awards and ceremonies, board meetings, sales meetings and marketing events.

Brand Ambassador

Your attire and surroundings while on video calls are all a reflection of Granicus. Please keep in mind the audience, their working environment and the overall impression that you want to present. Government employees tend to work in a more professional and/or conservative work environment and often want to see that reflected in the vendors that support them. When interacting with customers, your appearance should lean towards being professional, neutral and non-distracting. When considering what is “professional attire” we encourage people to be authentic to themselves while presenting a neat, presentable and trustworthy outward appearance.

Further, when in public representing Granicus, it is expected you will continue to dress in a manner that reflects and respects Granicus' values, your co-workers and the customers we represent.

ATTENDANCE AND PUNCTUALITY

Regular and timely attendance is an essential requirement of every employee's position. When any employee is late or absent, Granicus's ability to meet the demands of the business and perform other work is affected and an unfair burden is placed on fellow workers. Any employee who is going to be absent or late must contact the employee's supervisor as soon as possible (but not later than the expected start of their workday). Excessive absences or tardiness may lead to discipline, up to and including termination of employment.

For any unplanned absence, regardless of duration, employees must notify their supervisor each day they will be away from work (unless the employee is on an approved leave of absence or pre-approved time away from work). An employee who fails to report to work and fails to notify the employee's supervisor of the reason for such absence from work for three consecutive workdays will be considered to have abandoned the employee's job and voluntarily resigned.

EMPLOYEE INFORMATION

Changes in Information

To ensure accuracy of employees' personnel records, it is the responsibility of each employee to promptly update their information in the HRIS whenever applicable. Such updates include name, address, email, telephone number, emergency contact(s), marital status, required beneficiary or dependent information, and educational accomplishments. Employees are also responsible for reviewing their tax elections and direct deposit information on a regular basis to prevent taxation or deposit issues.

Protection of Confidential Information

In the course of employment with Granicus, employees will have access to, view, or work with information and materials that are confidential and that are regarded by Granicus, its customers, partners, vendors, suppliers, consultants, contractors and advisors as confidential, proprietary, or trade secrets ("confidential information"). Such confidential information is extremely valuable to Granicus and the parties with whom it does business. Improper access to or disclosure of any such confidential information could therefore, irreparably harm Granicus as well as its customers and the third parties with whom Granicus does business.

It is impossible to list all of the kinds of confidential information to which employees might have access or visibility, or with which employees might work or be entrusted while at Granicus. Therefore, employees should treat all non-public information and materials involving or related to business affairs, plans, and projects of Granicus, its customers, and the third parties with whom Granicus does business, as confidential information. Employees also must keep confidential all tangible and intangible property associated with these matters, such as notes, drawings, letters, software codes, programs, scripts, processes, designs, artwork, photographs, print-outs, and non-public materials of any kind that employees or others prepare. Granicus may further designate from time-to-time other specific items that are to be treated as confidential information.

Because of the importance of confidential information and materials to the business of Granicus and its customers and third parties, employees must not, at any time, disclose any such confidential information and materials to anyone—even after they leave Granicus—except as specifically authorized by Granicus in the course of their employment, nor may employees make any personal use of such confidential information and materials. Similarly, all non-public documents, files, records, and other work product relating to Granicus or its customers and third party partners and vendors are the property of Granicus, or the respective provider of such confidential information, and should not be removed from the premises of Granicus or otherwise disclosed including electronically except as authorized by

Granicus in the course of employees' employment. Employees must exercise utmost care and take all steps that may be reasonably necessary to protect and guard against the disclosure of any confidential information or materials to anyone, even family members. Further, Granicus confidential information may not be shared with Granicus vendors, suppliers, contractors, consultants and others who may serve Granicus or its customers, unless such parties are subject to confidentiality obligations and have a need to know the Granicus confidential information.

Employees are not entitled to view or gain access to all confidential information and materials of Granicus or its customers and third party partners and providers. Employees are entitled to gain access to and view only that confidential information and materials specifically entrusted to them for the purpose of performing their job at Granicus. If there are any doubts about what information must be kept confidential, contact the Legal Department for assistance prior to disclosing any confidential information.

If employees are in possession of a previous employer's or another's confidential information and materials, employees have an obligation not to disclose such confidential information or materials to anyone at Granicus and must not do so. Employees are also prohibited from violating the rights of any other party in connection with their work and must honor all copyrights and other rights in computer software, photographs, drawings, written works, music, and other materials licensed for use or entrusted to Granicus or its customers or authorized third parties.

No employee may photograph, tape, or otherwise record any person, document, conversation, communication, or activity that in any way involves confidential information of Granicus or employees of Granicus, its customers or any other individual with whom Granicus is doing business or intending to do business in any capacity, unless all parties have expressly consented unless otherwise permitted by applicable law, and proper precautions are taken to ensure all confidential information is protected. The authorized copying of documents in the ordinary course of business for the benefit of Granicus is not prohibited by this policy. Where the conduct engaged in is illegal, violators may be subject to prosecution under applicable law.

Employees may be required to sign one or more agreements with Granicus or its customers or third parties addressing the protection of confidential information. This policy is not intended to supersede or replace any such agreement(s), but rather this policy and any such agreement(s) will be read together and applied to the fullest extent permissible that provides Granicus and its customers and third parties with the greatest amount of protection possible with respect to information and materials that are regarded as confidential information.

This foregoing is not intended to, and does not, in any manner, prohibit employees from discussing among themselves or others' wages, benefits, and other terms and conditions of

employment or workplace matters of mutual concern that are protected by the National Labor Relations Act.

GRANICUS GLOBAL REMOTE WORKING POLICY

Granicus' Global Remote Working Policy (the Policy) applies to employees of all Granicus subsidiaries and affiliates (Granicus). The Policy also applies to third party consultants and contractors working on behalf of Granicus, subject to the terms of the Third-Party Consultants and Contractors section below.

In all cases remote working should be achieved without adverse effect on the overall efficiency and effectiveness of teams, functions, customers, and the business as a whole. Any remote working arrangements require close cooperation within teams and our broader business to ensure we continue serving Granicus customers and their audiences.

For the purposes of this Policy 'work location' or 'location of record' refers to the registered Granicus office recorded on an employee's employment documentation, or to their home address as registered with Granicus.

Granicus Employees

The Policy is intended to provide flexibility for Granicus employees by providing the freedom to work from home instead of a Granicus office, where possible. It is recognized that due to the breadth of roles across Granicus, some employees may be required to work in their assigned Granicus office on a regular basis; or attend their Granicus office when requested in order to facilitate business activities e.g., customer meetings, QBRs.

In some instances, an employee may wish to permanently or temporarily relocate to a different state, county or country. Whilst Granicus aims to be flexible, it may not always be feasible. Any request to work from another location must be approved in advance by the relevant Executive and Human Resources. Requests must be submitted in writing, outlining how the employee's work and/or Granicus customers will not be impacted by the move and whether it is feasible based on local laws and regulations (such as employment, tax and workplace health and safety (WHS)).

In the event a request for relocation is granted, Granicus will not provide the employee relocation support, sponsorship, or financial support. If the request is denied, it is expected that the employee will remain in the original location. Failure to do so will be deemed a voluntary resignation.

Employees joining Granicus via a merger or acquisition

Granicus understands that arrangements and policies may be in place within legacy organizations prior to an acquisition. During integration, Granicus' intention will be to align newly joining employees to this Policy. In the event legacy arrangements fall outside the Policy, Human Resources will work with the relevant Executive, managers, employees and integration leads to agree on an arrangement which is aligned with the Policy while ensuring optimal customer outcomes and business results. While Granicus aims to be flexible, continuation of existing arrangements cannot be guaranteed.

Third-Party Consultants and Contractors

Where possible, third-party consultants, contractors, solo practitioners and/or sole traders providing services to Granicus should be situated in a location where Granicus has an established entity, and in which they have the legal right to work.

Exceptions may be granted on a case-by-case basis where there is a compelling business reason, provided that the location's official travel advisory status is considered no higher than a Level 2*. Any exception must be approved in advance by the relevant Executive and Human Resources.

Requests to Work Outside Employees' Location of Record and Basis of Decisions

Any request to work from another state, county or country (including working while traveling internationally) must be put in writing to your immediate manager and Human Resources within a reasonable timeframe to enable a decision to be made. Employees must ensure requests have been approved by Human Resources before travel arrangements are made. Only 1 request per year will be approved, unless there are extenuating circumstances. Exceptions will require approval by the relevant Executive.

When determining the feasibility of the request, the following factors will be taken into consideration:

1. The current work location
2. Employment, tax, WHS, privacy laws and regulations in both the country of employment and visiting / transferring country
3. Customer and commercial agreements that may include location restrictions
4. Whether Granicus has an established office in a location
5. The nature of the employee's role
6. Length of time of the move i.e., permanent or temporary
7. Does the employee have the right-to-work in the future location
8. The distance between the existing Granicus location and the new location
9. Commercial impact on business (i.e. increase in cost of work travel expenses)
10. Demonstrated performance and the impact of the relocation on future performance

In addition to the above, temporary or permanent international relocation will also be subject to the following considerations:

1. Any applicable security threats associated with working from the future country
2. Tenure in role, e.g., is a probationary period being served
3. Does Granicus have a legal entity in the future location

Employees must obtain written approval from Granicus prior to travelling in the form of a Working Travel Agreement. Failure to do so may result in disciplinary action.

**Refers to the Travel Advisory status as published on
<https://travel.state.gov/content/travel/en/traveladvisories/traveladvisories.html/>*

COMMITMENT TO DIVERSITY, EQUITY, & INCLUSION

Here at Granicus, we acknowledge, value, and respect the differences between us. We embrace, support, and celebrate our employee differences in race, skin color, ethnicity, age, gender identity or expression, sexual orientation, religion, ability, language, nationality, national origin, family or marital status, socio-economic class, political affiliation, military service, and other unique characteristics. The Diversity, Equity, and Inclusion (“DE&I”) policy establishes the principles and requirements by which Granicus will enhance DE&I throughout the organization. The policy applies to all Granicus subsidiaries and affiliates, which include employees, contractors, and anyone else who performs work on behalf of Granicus.

Our Commitment

At Granicus, our mission is to bring governments and their constituents closer together. This truly starts from inside, with our Granicus team. Granicus is committed to cultivating and preserving a diverse, inclusive, and equitable environment for all employees. We value and rely on the differences that Granicans bring to the table and their unique ability to bring the diversity of thought and perspectives that drive the company’s success.

Granicus’ diversity initiatives are applicable—but not limited—to our practices and policies on recruitment and selection, compensation and benefits, professional development and training, promotions, transfers, social and recreational programs, layoffs, terminations, and the ongoing development of a work environment built on the premise of equity. As an ongoing effort, Granicus will:

Recruit Diverse Talent.

Granicus should be as diverse as our customers and their residents. Granicus will be intentional about recruiting diverse talent. We will diversify talent pools and candidate outreach channels to attract candidates of various backgrounds and experiences.

Create a Sense of Belonging.

We want all employees to feel as though they have a place here at Granicus. We want to create and maintain an environment where employees can be at work as their authentic selves and feel that they are valued and respected for who they are, without judgment.

Grow and Succeed.

Our internal processes must be equitable to give all employees equal access to opportunities. Equal access should result in diversity at all levels of the organization. Granicus will create and sustain an environment where all employees have equal

access to opportunities based on merit and performance, uninhibited by identity or characteristics. Granicus' processes and policies should reflect our intentionality to create a welcoming environment for all, and diversity should be reflected in all levels of the organization as a consequence.

Policy Guidelines

Diversity, Equity, and Inclusion Vision

The Granicus DE&I Vision is not only to benefit from a diverse workforce, but to have a community of employees whose differences are valued, respected and celebrated, that serves to attract more diversity and preserve existing diversity. We strive to eliminate harmful bias and prejudices that negatively impact the overall employee experience, prevent employees from performing at their best, and limit Granicus' potential.

Diversity, Equity, and Inclusion Mission

At Granicus, we believe that diversity fosters the innovation and creativity we need to meet our full potential. We commit to creating an inclusive culture that respects everyone, which is reflected in every internal and external interaction. We value individuality and want every employee to feel they belong at Granicus.

Granicus is dedicated to making diversity, equity, and inclusion more than just words, benchmarks, or a trend. With open hearts and minds, Granicus strives to embed these principles in our operating fabric as a business, as a partner to the public sector, as a technology leader, and as a contemporary corporate partner.

General Responsibilities

Everyone at Granicus is responsible for treating all others with dignity and respect in all situations.

Because of Granicus' reputation as a trusted government partner, discriminatory behaviors from any subsidiary or affiliate will have a negative impact on the company as a whole; therefore everyone has the responsibility to behave responsibly in their daily lives, inside and outside of Granicus, including on social media, by respecting the differences of others and increasing personal awareness of bias, microaggressions, and other potentially harmful conduct that may hinder Granicus' ability to be more inclusive and equitable.

Collectively, it is a shared responsibility to not engage in harassment or discrimination, including as outlined in our harassment and discrimination policies, or bullying of any kind, as this would create a toxic environment for others to live in their authenticity.

Manager Responsibilities

Managers are responsible for additional obligations beyond the general responsibilities outlined above. Managers are encouraged to lead by example in creating an inclusive workplace. Managers should value the diverse input of their team members and promote collaboration amongst the team. The performance and development of team members are reliant on the mentorship, leadership, and guidance from management; therefore, Granicus requires managers to make decisions free from discrimination and bias. This includes, but is not limited to hiring, performance management, promotion, termination and compensation decisions. Managers must work closely with HR to provide reasonable accommodations for qualified individuals as outlined in company policy. Managers must also appropriately address team behavior that is inconsistent with this and/or other Granicus policies.

Executive Responsibilities

Additionally, executives are further responsible to create and foster a diverse, inclusive, and equitable environment. It is an executive responsibility to uphold this policy to the highest degree in all decision making. Executives are urged to hold themselves to the highest standard in their interactions with others. Executives should actively recommend ways to drive diversity, equity, and inclusion at Granicus. An inclusive mindset must be brought to each interaction and strategic project implemented at Granicus.

Guidance and strategy should be broached with consideration for the immediate and lasting impact on diversity at Granicus.

Disabilities and Accommodations

Granicus complies with the Americans with Disabilities Act, Title VII of the Civil Rights Act of 1964, and other applicable laws prohibiting discrimination in employment against qualified individuals including those with disabilities or sincerely held religious beliefs. To the extent required by applicable law, Granicus will make reasonable accommodations for qualified employees with known disabilities or sincerely held religious belief. If an employee needs a reasonable accommodation, contact Human Resources. Human Resources will work with the appropriate supervisor(s) to review the request and evaluate possible accommodations. Granicus will not retaliate against any employee for requesting or obtaining any reasonable accommodation in accordance with applicable law.

Service Animals

Granicus, in accordance with the Americans with Disabilities Act ("ADA"), does allow service animals for a person with disabilities. All other pets (a domestic animal kept for pleasure or companionship) are prohibited in the Granicus offices. In compliance with the ADA, service animals are welcome on company property and may attend any meeting or other event. There may be an exception to certain areas.

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

Under the ADA, Emotional Support Animals are not considered Service Animals, and will not be allowed on company premises unless 1) required by local/state law, or 2) approved as a reasonable accommodation to an ADA claim. Employees requesting accommodation for a disability that includes a service animal, or emotional support animal, must contact Human Resources. The owner/partner must provide HR with information as to how the animal accommodates for the individual's disability. If approved, the owner/partner will be given a list of requirements that need to be met when the animal is on Granicus property. In addition, all animals must be approved by, and in compliance with, any building lease to which Granicus is a party.

Equal Employment Opportunity

Granicus is committed to providing equal employment opportunities. All qualified applicants and employees will be considered for employment and advancement without regard to race, color, religion, creed, national origin, ancestry, sex, gender, gender identity, gender expression, physical or mental disability, age, genetic information, sexual or affectional orientation, marital status, status with regard to public assistance, familial status, military or veteran status or any other status protected by applicable law. This policy applies to all employment practices and terms and conditions of employment, including but not limited to promotions, transfers, compensation, terminations, training and participation in Granicus sponsored benefits or programs.

Employees should raise any concerns they might have regarding possible discrimination in accordance with the complaint procedure described below. No retaliation against anyone who in good faith brings forth a complaint of possible discrimination will be permitted or tolerated.

COMPENSATION AND TIMEKEEPING

Pay Transparency Nondiscrimination Provision

Granicus will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with Granicus's legal duty to furnish information. 41 CFR 60-1.35(c).

Work Week and Pay Periods

Granicus' work week for payroll record-keeping purposes commences at 12:00 a.m. on Sunday and ends the following Saturday at 11:59 p.m. Payroll checks will be issued semi-monthly. If a pay day falls on a holiday, checks will be distributed on the preceding work day.

Travel and Expense Reimbursement

Granicus will reimburse employees for reasonable expenses incurred while traveling on business or engaged in Granicus-related entertainment. All expenses must be submitted to finance with acceptable receipts for each expense being claimed and approved by your direct manager. This information is only a summary. Please refer to all applicable Granicus expense and reimbursement policies for more information.

Employee Classification

For payroll purposes, employees are classified as exempt or non-exempt under applicable law. Exempt employees are generally paid on a salary basis. Non-exempt employees are generally paid on an hourly basis. Any employee who has questions regarding the employee's classification should immediately notify Human Resources.

Timekeeping and Overtime for Non-exempt Employees

All non-exempt employees are required to accurately record their time worked through their designated time keeping system. Time records must be reviewed and approved by immediate supervisors. Non-exempt employees must exercise care to complete their time records accurately. Falsifying time records or working "off the clock" is strictly prohibited. An employee who submits inaccurate time entries or otherwise tampers with time records will be subject to discipline, up to and including termination of employment.

Non-exempt employees are entitled to overtime pay for all hours worked in excess of 40 hours in a work week. Paid or unpaid time off pursuant to a Granicus policy (for example, FTO, holidays, bereavement), will not be counted as hours worked for purposes of determining whether an employee is entitled to overtime pay. Non-exempt employees must not work overtime unless authorized in advance by their supervisor. Any employee who works unauthorized overtime must accurately record any overtime hours worked and will be paid for such time but may be subject to discipline for failing to secure the required authorization. No supervisor or other employee has the authority to direct or approve "off the clock" work. Any employee who is asked not to record time worked, including overtime, must promptly report the request to Human Resources.

Paid or unpaid time off pursuant to a Granicus policy will not be counted as hours worked for purposes of determining whether an employee is entitled to receive overtime pay.

Salary for Exempt Employees

Exempt employees are expected to typically work at least 40 hours per week and are generally paid a fixed salary for their job responsibilities, without regard to the number of hours needed in a work week to complete the job. Exempt employees are not eligible for overtime pay but are required to spend whatever hours are necessary to fulfill their job responsibilities. Similarly, regardless of variations in the number of days or hours worked or the quality of the work performed, Granicus will not make deductions from an exempt employee's salary for any work week in which the employee worked, unless such deductions are authorized by applicable law.

Breaks

Non-exempt employees may be eligible for rest, meal, or nursing mother breaks depending on how many hours they work and as required under applicable law. Non-exempt employees are not authorized to work during unpaid meal breaks. Any non-exempt employee who works either authorized or unauthorized time during a meal break will be paid for time worked and must report this time to the employee's supervisor immediately and record it on the employee's time record. Non-exempt employees should talk to their supervisors about rest and meal breaks for their particular department or location, as well as schedules for such breaks.

HEALTH AND SAFETY

Drug-Free Workplace

Granicus is dedicated to maintaining a drug-free workplace. Granicus recognizes that drug and irresponsible alcohol use in the workplace can have serious consequences in terms of safety, security, and productivity. For this reason, Granicus prohibits the following activities while working, while on Granicus property (including parking facilities), and/or while operating or occupying Granicus equipment, machinery, or vehicles:

- Use, consumption, or possession of marijuana or illegal drugs;
- Any use of alcohol while operating Granicus vehicles, or being under the influence of alcohol, marijuana or illegal drugs while operating or occupying Granicus equipment, machinery or vehicles;
- Any other irresponsible use of alcohol;
- Buying, selling, offering, or receiving marijuana, or illegal drugs;
- Reporting to work or working while under the influence of alcohol, marijuana, or illegal drugs; and
- Electronic cigarettes or tobacco use in any form outside of designated outdoor smoking areas.

For purposes of this policy, "illegal drugs" includes but is not limited to legal drugs that were not legally obtained or that were used for purposes other than the purpose for which they were prescribed.

Granicus recognizes that from time to time it may authorize alcohol to be served at certain functions and that some employees may hold positions where alcohol may be consumed under certain limited circumstances, such as a business function, meeting and/or business-related meal or entertainment activity. No employee is required or urged to drink alcohol at any such function or as a part of the employee's job. Whether or not an employee decides to do so is the employee's own personal choice. Any employee who drinks alcohol at a Granicus-sponsored function or business-related event may not drive home while impaired by alcohol.

Granicus encourages any employee who may have an alcohol or drug-related problem to contact the Employee Assistance Program or seek other professional assistance. Granicus will support any employee desiring assistance. Employees, however, should seek help before the dependency affects their job performance. While drug or alcohol dependency itself is not grounds for discipline or termination of employment, any work problems resulting from

such use or dependency will be dealt with as any other work-related problem and may be cause for discipline or discharge.

Any drug or alcohol testing program that may be implemented by Granicus will be addressed in a separate Drug and/or Alcohol Testing Policy.

Smoking

Smoking electronic cigarettes and tobacco use in any form is prohibited indoors at all Granicus facilities and within the number of feet of any entrance or exit that is required by the building management at each Granicus facility. Smoking electronic cigarettes and tobacco use is permitted outside Granicus's buildings, provided that all butts, other tobacco products, and electronic delivery devices are fully extinguished and properly discarded in the trash, and the employee stands at least the minimum number of feet from any entrance or exit to Granicus's facilities that is required by the building management at each Granicus facility.

Safety

Granicus will comply with all applicable safety laws, including any vaccine regulations to the extent required, and make efforts to reduce the possibility of workplace accidents. Any employee who has any concerns about safety within the work environment is strongly encouraged to report them to their immediate supervisor and/or Human Resources. Any employee who sustains an illness or injury, that could require medical attention, while on the job, should report the injury or illness to the employee's supervisor or Human Resources immediately. Human Resources will complete an injury report with the employee and file a claim with the insurance company.

Violence-Free Workplace

To maintain a safe workplace, Granicus prohibits the possession of firearms and/or other weapons while on or using Granicus property or while an employee is engaged in Granicus business (with the exceptions of lawful possession and storage of a firearm in a parking facility where specifically permitted under applicable law). Acts of violence and/or any type of violent or threatening behavior towards employees, vendors, suppliers, customers and clients at any time while on or using Granicus property, during working hours or after hours, or while an employee is engaged in Granicus business regardless of the employee's location is prohibited. All temporary employees, contractors, freelancers, vendors, service personnel,

and visitors of any type are also prohibited from carrying firearms or other weapons on Granicus premises.

For purposes of this policy, "violent behavior" includes, but is not limited to, any physical touching that is intended to or does inflict injury on another, including but not limited to the use of a weapon against another individual. Violent behavior also includes but is not limited to: stalking or intimidating a person, making physical or verbal threats, and intentionally destroying Granicus property or property of another individual affiliated with Granicus.

"Granicus property" includes, but is not limited to, desks, offices, workstations, file cabinets, email and voice mail, facilities, buildings, structures, and motor vehicles, whether owned, leased, or used by Granicus. Granicus property is intended to apply to all work locations and sites in which Granicus does business and transportation between such locations while in the course and scope of employment for Granicus.

Employees should report the following incidents immediately to Human Resources and/or the building security:

- Any suspicious activity or unauthorized persons in the building or parking lot.
- Anyone in possession of a firearm or other weapon while on Granicus property.
- Possession by employees of a firearm or other weapon while engaged in Granicus business regardless of whether or not they are on Granicus property except where firearms are allowed by law in non-Granicus owned parking facilities or parking areas.
- Any threatened or actual violent behavior by or against an employee while on Granicus property or while engaged in Granicus business.
- Any threat of violent behavior made known to an employee when off Granicus property and not engaged in Granicus business, if there is reason to believe that the threat may be carried out on Granicus property or while the employee or person making the threat is engaged in Granicus business.
- Any other incident the employee finds threatening or believes might lead to a violent altercation while on Granicus property or while engaged in Granicus business.

Employees who feel that they are in imminent danger of being harmed should dial 911 if the situation warrants.

GRANICUS CODE OF ETHICS AND CONDUCT

The Granicus Code of Ethics and Conduct ("Code") includes standards and policies that must always be observed by you when acting on behalf of Granicus or any of its subsidiaries and affiliates. It is important that you know and understand the policies and standards contained in this Code as well as all other Granicus policies and procedures. For the avoidance of doubt, compliance with this Handbook and all Granicus policies and procedures is mandatory and includes during all work-related events, work-related travel or otherwise.

Granicus is dedicated to supporting our customers and conducting business ethically and with integrity. We must treat all employees, partners, customers and vendors with professional courtesy and must also refrain from engaging in improper conduct or unethical practices. Granicus sells its platform solutions and services directly and indirectly to federal, state and local public sector entities, as well as to commercial entities. This Code is our roadmap for doing business the right way. Put simply, we do business the right way when we act ethically and consistently with the core value of integrity, the Handbook, the Code, our policies and all applicable laws. Although no document can address every decision you could face during your career with Granicus, this Code will help guide you. Employees must contact Human Resources for assistance with any questions about this Code or the Legal Department regarding corporate ethics and compliance generally.

This Code applies to all officers, directors, employees, and agents acting on behalf of Granicus. We are each personally responsible for acting within the letter and spirit of the law and upholding this Code. Supervisory personnel are also responsible for ensuring that this Code is understood and enforced within their departments.

Violations of this Code, including, subject to applicable law, failures to report potential violations by others, may result in adverse disciplinary actions, including termination of employment. If you believe in good faith that a violation of this Code has occurred, we encourage you to discuss the issue with (1) your supervisor, (2) an appropriate Human Resources representative or (3) the Legal Department.

Company Personnel may also raise concerns or questions regarding the Code or make good faith complaints or reports at any time through the confidential online NAVEX EthicsPoint Help Line (see Anonymous Reporting section below for additional details) at:

Hotline Number: 1-833-547-0144 *(for reports based in the U.S.). For other countries, please see the website below:*

Website: www.Granicus.EthicsPoint.com

Retaliation for raising a concern under this Code in good faith or for participating in an investigation into any such concerns is **strictly prohibited**. Retaliation is a serious violation of the Code and should be reported immediately through the channels discussed above.

Any terms not defined in this Code shall have the meanings attributed to them in the Handbook.

Anti-Harassment and Anti-Discrimination

Granicus is committed to maintaining a work environment that is free from discrimination and harassment, including unlawfully intimidating, hostile, or offensive conduct. Harassment and other inappropriate conduct that is based on, or is directed toward someone because of race, color, religion, creed, national origin, ancestry, sex, gender, gender identity, gender expression, physical or mental disability, age, genetic information, sexual or affectional orientation, marital or familial status, status with regard to public assistance, military or veteran status, or any other status protected by applicable law, is against Granicus's policy and will not be permitted or tolerated. All forms of electronic communication (such as email and Internet use) are covered by this policy in the same manner as other communications and actions.

Prohibited Conduct

Prohibited conduct includes verbal, written, visual, or physical conduct that (1) relates to another person's race, color, religion, creed, national origin, ancestry, sex, gender, gender identity, gender expression, physical or mental disability, age, genetic information, sexual or affectional orientation, marital status, status with regard to public assistance, familial status, military or veteran status, or any other status protected by applicable law or (2) is directed toward another person because of that person's race, color, religion, creed, national origin, ancestry, sex, gender, gender identity, gender expression, physical or mental disability, age, genetic information, sexual or affectional orientation, marital status or familial, status with regard to public assistance, military or veteran status, or any other status protected by applicable law, where such conduct may have the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Prohibited conduct may include, among other things, telling racist or sexist jokes or making offensive or derogatory remarks about another person's race, color, religion, creed, national origin, ancestry, sex, gender, gender identity, gender expression, physical or mental disability, age, genetic information, sexual or affectional orientation, marital status, status with regard to public assistance, familial status, military or veteran status, or any other status protected by applicable law. Prohibited conduct also includes sexual harassment as discussed below.

Discrimination and harassment are prohibited whether it is committed by supervisors, co-workers, or non-employees, including vendors, suppliers, customers and clients. Employees must not engage in prohibited conduct against other Granicus employees or personnel of Granicus's vendors, suppliers, customers and clients.

Sexual Harassment

Prohibited conduct includes, but is not limited to, conduct that may constitute or lead to sexual harassment, such as: use of suggestive sexual comments, jokes, or innuendo; persistent, unwanted flirtation or invitations for dates or other social activities; unwelcome sexual advances or passes; sexual remarks or questions about a person's body, clothing, or sexual activities; patting, pinching, or other offensive touching; or displays of sexually suggestive pictures or objects. Sexually harassing conduct may include conduct between persons of the same gender, regardless of the sexual orientation of those persons.

Consequences

Conduct deemed contradictory to the beliefs and expectations outlined in this Code is damaging to fellow employees and to Granicus as a whole, and as such, Granicus has a zero-tolerance policy for behavior contradictory to this Code. Those who are found to be non-compliant and/or those found to have engaged in discrimination, harassment, bullying, hate speech, retaliation, and/or any other non-inclusive behavior, will be subject to disciplinary action, up to and including termination of employment.

Granicus recognizes that certain of its activities are governed by applicable laws or other regulations. Nothing in this Code or the Handbook is intended to interfere or conflict with the company's compliance with legal requirements or regulations.

Reporting Inappropriate Conduct

If an employee or contractor believes that they, or any other employee, contractor, or other partner of Granicus has been subjected to conduct prohibited by this Code or other Granicus policies, they are required to report it immediately. Granicus may ask that complaints be put in writing to facilitate the investigation process. In addition, for employees who are comfortable doing so, telling the person who is engaging in inappropriate behavior to stop is often the most effective way to stop objectionable behavior.

Reports can be made to any Granicus manager, HR Generalist, member of the HR leadership team, or through NAVEX EthicsPoint anonymous reporting. We encourage reports to be as detailed as possible and to include all relevant information needed to follow-up on the claim appropriately.

Supervisors who become aware of any incidents or alleged incidents of possible discrimination, harassment, or bullying are required to immediately report these directly to Human Resources. Supervisors who receive complaints of possible discrimination or harassment must consult Human Resources before undertaking an investigation or other action (except for any action to stop any currently occurring behavior). Any supervisor who fails to report allegations of discrimination, harassment, or other prohibited conduct or who otherwise fails to deal properly with such allegations may be subject to discipline, up to and including termination of employment.

Granicus takes allegations of harassment, discrimination, and bullying incredibly seriously and will promptly and thoroughly investigate all allegations made in good faith. Based upon its investigation, Granicus will take swift and appropriate corrective action. Any employee found to have engaged in discrimination, harassment, or other prohibited conduct will be subject to appropriate discipline or corrective action, up to and including termination of employment. Appropriate steps will also be taken if any non-employee (such as contractors/consultants, suppliers, customers, and clients) are found to have discriminated against or harassed any employee of Granicus. Reports of discrimination or harassment will be kept confidential to the extent possible, consistent with the need for a thorough investigation.

Granicus will not retaliate or take any form of reprisal against any victim of or witness to discrimination or harassment, and any such retaliation or reprisal by a Granicus employee is prohibited. Any employee who retaliates against another employee or witness because of a complaint of discrimination or harassment, or because of participation in any investigation, will be subject to appropriate discipline or corrective action, up to and including termination of employment.

Anonymous Reporting

As a part of our commitment to Diversity, Equity, and Inclusion, Granicus' anonymous reporting line through EthicsPoint is available for employees who prefer to report policy violations anonymously. The primary route for reporting concerns should otherwise still be to speak with a member of the Human Resource Generalist or Business Partner team, or your direct manager. Granicus works hard to create an environment where employees can disclose concerns in a safe space. It allows HR the opportunity to ask questions and complete a more thorough investigation, however, for those whom are uncomfortable reporting issues in this manner, EthicsPoint serves as another reporting option. The EthicsPoint system is completely confidential and is managed through Navex Global. Reports made through EthicsPoint are sent to select members of HR or Legal and will be investigated in the same manner as those made through primary channels. Reports should include enough information for the HR team to follow-up on the report and complete an investigation.

Reports can be made via Granicus' dedicated hotline or via the web intake form:

Hotline Number: 1-833-547-0144 *(for reports based in the U.S. For other countries, please see the website below)*

Website: www.Granicus.EthicsPoint.com

In the event insufficient details are provided, the HR team will request additional information. Because no personal information is retained in EthicsPoint, it is the responsibility of the reporter to take note of and use their report key and password to check the system for updates.

Electronic Communications

All employees are required to review and acknowledge receipt of Granicus's Acceptable Use Policy.

Use of Granicus computers, telephones, voicemail, email, Internet and other electronic communications is to support Granicus's business. It is the responsibility of each employee to ensure that all Granicus technology is used for proper business purposes, in a responsible manner and does not compromise confidential, proprietary or other sensitive information. Employees who have learned of electronic communications inconsistent with these requirements must immediately notify Human Resources. Violations may result in disciplinary action, up to and including termination of employment.

Employees do not have a personal privacy right in any matter created, received, sent, accessed, or stored on any Granicus computer, telephone, voicemail, email or Internet connection, application or otherwise. Designating a matter as private or confidential or the existence of passwords and "message delete" functions does not restrict or eliminate Granicus's ability or right to access electronic communications. Granicus monitors its computer, telephone, voicemail and email systems and Internet connection and, at any time and without prior notice, may record telephone calls, listen to voicemail, and read and copy any and all files or data contained therein (including, but not limited to, email messages and personal file directories). Notwithstanding the foregoing, Granicus will do so only in accordance with all applicable laws. Granicus maintains full access to all electronic communication systems for the purpose of assuring compliance with legal requirements as well as internal policies, supporting the performance of internal investigations, and assisting with the management of Granicus's information systems.

All use of electronic communications must conform to the same standards of propriety and respect as any other verbal or written business communications. Demeaning, harassing, or

defamatory communications, messages or postings, or any other electronic communications inconsistent with or in violation of Granicus policies, are prohibited.

Computer Systems in General

Computer resources are assets of Granicus and are to be protected from unauthorized access, modification, destruction, theft, or disclosure. An active or unlocked computer should not be left unattended for any extended period of time, such as, for example, overnight or while the user is otherwise away from the office or other location where the computer is being used for any period of time. Individual passwords for computers are confidential and may not be shared or posted. If a user's password is learned by someone else, the password should be changed immediately. Each user is responsible for activity performed using the user's password. No user should attempt to obtain access to another user's files or other information without prior authorization.

Email Usage

The principal purpose of electronic mail ("email") is to facilitate business communications among Granicus employees and with its customers, vendors and partners. Email should not be used to solicit outside business ventures or for any political or religious purpose, unless approved in advance by Granicus. Email that contains information considered confidential or proprietary to Granicus must be treated as confidential in accordance with Granicus's policy regarding Protection of Confidential Information. Except with respect to Granicus's management and monitoring of information systems, no employee may share email passwords with another employee, provide email access to an unauthorized person, or access another user's email without authorization.

Internet Access And Usage

Granicus's connection to the Internet is principally for work-related purposes. Limited non-work-related use of Granicus's Internet is permitted so long as such use is minimal and does not impact performance or violate any of Granicus's policies or work rules. Any unauthorized use of the Internet is prohibited. Unauthorized uses include, but are not limited to, posting, viewing, downloading, or otherwise transmitting or receiving offensive, defamatory, pornographic, or sexually explicit material; engaging in computer "hacking" or other related activities; or attempting to disable or compromise the security of information on any computer.

Social Media Use

Granicus supports employees' active participation in social media and online communications. The term "social media" includes, but is not limited to, any of the following venues:

- Social networking sites (e.g. LinkedIn, GovLoop, Facebook, Plaxo, Hi5, etc.)
- Social sharing sites (e.g. YouTube, SlideShare, Flickr, Twitch, etc.)
- Forums and discussion boards
- Wikis
- Blogs
- Micro blogging (e.g. Twitter, identi.ca, Jaiku, etc.)
- Social bookmarking sites (e.g. Digg, StumbleUpon, Reddit, Pinterest, etc.)
- Review sites (e.g. Epinions, Angie's List, Yelp, ChoiceVendor, etc.)
- Internal social media (e.g. Salesforce Chatter, Teams, etc.)

These guidelines apply to official use of social media on behalf of Granicus as well as personal use.

- Employees are expected to be respectful and use good judgment. Remember that what you post or publish may be public information for a long time.
- Employees should not misuse Granicus's time and resources. Your personal use of social media should not interfere with your responsibilities at Granicus. The Granicus computer resources are to be used primarily for business purposes.
- Employees must not make unauthorized statements on behalf of Granicus. Unless authorized to place content on social media on behalf of Granicus, content placed on social media regarding Granicus or its management, employees, customers, competitors or vendors must be free of any impression that the views expressed are anything more than personal opinion; in other words, such content must make clear that it does not represent the views of Granicus. Unless a posting is authorized to be made on behalf of Granicus, postings that disclose an employee's association with Granicus should include a disclaimer stating that any opinions expressed are the employee's own and do not represent those of Granicus.
- Use of social media may not conflict with or violate any of Granicus's existing policies including, but not limited to, the policies on harassment, discrimination, this Code, and Violence-Free Workplace.
- Employees must not use or disclose confidential or proprietary information. Use of social media may not conflict with Granicus's Protection of Confidential Information policy.

Outside Employment

Employees are permitted to engage in outside work or hold other jobs, subject to certain restrictions. Activities and conduct away from the job must not compete with, conflict with, or compromise Granicus' interests or adversely affect job performance and the ability to fulfill all responsibilities to Granicus. Employees are prohibited from performing any services for customers on nonworking time that are normally performed by Granicus. This prohibition also extends to the unauthorized use of any Granicus tools or equipment and the unauthorized use or application of any confidential information. In addition, employees are not to solicit or conduct any outside business during paid working time.

Employees are cautioned to carefully consider the demands that additional work activity will create before accepting outside employment. Outside employment will not be considered an excuse for poor job performance, absenteeism, tardiness, leaving early, refusal to travel, or refusal to work overtime or different hours. If Granicus determines that an employee's outside work interferes with the employee's performance or the ability to meet the requirements of Granicus, as modified from time to time, such employee may be asked to terminate the outside employment if the employee wishes to remain employed with Granicus.

Solicitation and Distribution

Employees may engage in fundraising solicitation on Granicus premises only during their nonworking time. Nonworking time means time during meals or breaks and before or after work.

Employees may distribute or circulate noncompany written materials only during nonworking time and only in non-work areas. If an employee is not certain whether an area is a work or non-work area, they should consult Human Resources for clarification.

Solicitation or distribution in any way connected with the sale of any goods or services for profit is strictly prohibited anywhere on Granicus property at any time. Similarly, solicitation or distribution of literature for any purpose by nonemployees is strictly prohibited on Granicus's property at any time.

Relationships in the Workplace

Granicus respects the right of all individuals to develop and engage in personal relationships with others they work with at Granicus. As long as a personal relationship with another Granicus employee is consensual and does not give rise to favoritism, create any conflict of interest or the appearance of one, such relationships are permitted. Any close relationship,

that can have a real or perceived conflict of interest between two Granicus employees must be disclosed to Human Resources. Personal relationships between an employee who has a supervisory role with respect to the other employee or is otherwise in a position to affect the other employee's compensation, benefits, performance or career advancement are expressly prohibited.

Employment Of Relatives

If a relative of a Granicus employee is being considered for any position, it is expected that the relationship is disclosed to Human Resources for prior approval and that if the relative is hired it does not create real or perceived conflicts of interest. Such conflicts of interest typically exist where one relative works in a supervisory role of the other or otherwise is in a position to affect the other employee's compensation, benefits, performance, career advancement, or exert influence or authority over the employee's work direction. If such situations develop, Granicus' HR department will determine whether the situation poses an actual or potential conflict of interest and if it can be properly mitigated.

WORKING WITH CUSTOMERS

- Granicus must always compete fairly and follow the rules applicable to government competitions or as otherwise set forth by commercial customers.
- We will not seek or obtain competitors' non-public proprietary information or government sensitive information relating to a procurement.
- We promote open and fair competitions for all subcontractors and suppliers.
- We strive to create opportunities for small businesses, including those owned by women, minorities, and military veterans.
- We never solicit or accept improper payments from subcontractors and suppliers.
- We respect diversity and promote equal opportunity.
- We strictly comply with the specifications, requirements, and terms and conditions of all contracts.
- We keep complete and accurate records.
- We must always treat customers professionally and refrain from disparaging Granicus customers in any way.

ANTI-BRIBERY AND ANTI-CORRUPTION

Granicus is committed to conducting business in an honest and ethical manner and complying with all laws and regulations applicable to anti-bribery, anti-corruption, gifts, hospitality, political and charitable contributions, and sponsorships in its worldwide operations. Employees must comply with all applicable anti-bribery laws and anti-corruption regulations, including but not limited to, the U.S. False Claims Act, the U.S. Anti-Kickback Act of 1986, the U.S. Foreign Corrupt Practices Act, and the UK Bribery Act 2010, and similar legislation in other jurisdictions where Granicus conducts business. Employees should be aware that not only their national laws, but potentially also extra-territorial laws may apply.

Granicus will conduct its business with customers with integrity, fairness and openness. All Granicus business transactions with the government must be free from even the perception that favorable treatment was sought or received in exchange for any bribes or gifts.

A bribe is something of value given with the intent to influence an official act, such as awarding a contract to Granicus. Granicus strictly prohibits all bribery and corruption, whether made for the benefit of, or received from, any third party, public or private. No employee shall, directly or indirectly, promise, authorize, offer or pay anything of value (including gifts, hospitality, political and charitable contributions and sponsorships) to any government official or other party to improperly obtain or retain business or otherwise secure an undue advantage. Conduct that is improper if performed directly is also improper if performed indirectly. Employees must not make, authorize or facilitate a payment if they believe it likely that bribery will occur.

THE FOLLOWING CONDUCT IS EXPRESSLY PROHIBITED:

- Providing or offering to provide anything of value, such as a gratuity, favor, discount, entertainment, hospitality, loan, forbearance, training or other item of monetary value to a government employee in order to influence that employee's official action.
- Offering a gift or free attendance at a conference or other meeting (that charges an entry fee for general admission) without first seeking approval from the Legal Department.
- Offering a gift of free travel to a government employee without first seeking approval from the Legal Department.
- Offering bribes of any kind, whether to government employees or business partners.
- Paying "kickbacks" or making improper payments in association with government business.
- Making payments to a company or individual that are solely contingent on Granicus receiving government business.

- Paying back-end rebates, referral or influence fees or other consideration that is not transparent to the government and could be perceived as an improper attempt to influence government business.
- Accepting or soliciting gifts, loans, travel, meals, or other benefits from third parties that could affect an employee's objectivity and professional judgment.
- Any violation or failure to report a violation of Granicus's Combating Trafficking in Persons Policy or the Granicus Anti-Slavery and Human Trafficking statement.

GLOBAL TRADE COMPLIANCE

Our company's global reach demands that we exercise appropriate due diligence as to the third parties with which we do business and that we comply with all international laws regulating trade, as well as all export control and import laws and regulations that govern the exportation and importation of commodities and technical data. Granicus understands that the rules vary depending on the type of goods, technology, or services being exported or imported and the intended destination. These laws are complex and can change quickly as governments address new political or security issues. Engage the Legal Department for assistance with export and import matters.

The U.S. and other countries where we do business use embargoes and sanctions to further foreign policy and national security objectives. These embargoes and sanctions prohibit or severely restrict our direct or indirect dealings with certain countries. They may also restrict our dealings with individuals or with companies controlled by the government. You are responsible for obtaining a review of any transaction involving any country subject to U.S. or U.S.- approved embargoes or sanctions to determine whether applicable laws prohibit the proposed transaction. In addition, all transactions must be screened to ensure that they do not involve any prohibited parties, destinations, or end-uses.

You must work with the Legal Department to ensure all vendors and contractors are in compliance with all applicable laws and regulations.

In addition, Granicus complies with applicable laws that prohibit cooperating in economic boycotts of certain other countries. We are required to report to the U.S. government the receipt of any requests to support such boycotts or to provide information to verify compliance with such boycotts. Therefore, if you believe you have received a boycott request or have any questions about boycott activities, it is important that you notify the Legal Department immediately.

CONFLICTS OF INTEREST

Personal

Employees must never use their positions with Granicus, or any of its customers, partners or others for private gain, to advance personal interests or to obtain favors or benefits for themselves, members of their families or any other individuals, companies or business entities. Employees of Granicus must conduct their personal affairs such that their duties and responsibilities to Granicus are not jeopardized or legal questions do not arise with respect to their association or work with Granicus. If any employee or relative has a significant ownership in a firm with which Granicus does business, or if an employee has any influence on transactions involving purchases, contracts, or leases, the employee must immediately disclose to Human Resources and the Legal Department the existence of any actual or potential conflicts of interest.

Personal – Government Employees

Government employees are prohibited from engaging in any activity that constitutes a personal conflict of interest. Granicus will not put government employees in a situation in which their responsibilities to the government (including their objectivity and judgment) are compromised by an outside transaction or relationship.

Organizational

Employees must avoid putting Granicus in a position of an organizational conflict of interest. The government has organizational conflict of interest rules that are intended to prevent the existence of conflicting roles that might bias the contractor's judgment or advice and to prevent unfair competitive advantages. For example, for U.S. Federal government opportunities, a contractor generally cannot draft Request for Proposal ("RFP") specifications for the government and then participate in the resulting competition for a government contract that is based on those RFP specifications. Also, a contractor that is hired by the government to provide objective consulting advice generally cannot recommend that the government purchase the contractor's own products.

Government Post-Employment “Revolving Door” Restrictions

Granicus respects the obligations of current and former government employees. Granicus understands that individuals are free to move in and out of government service and that individuals with prior government experience can bring great value to Granicus. However, Granicus understand that restrictions limit our ability to conduct employment discussions with current government employees and that other restrictions limit the ability of former government employees to perform certain functions after leaving the government.

Employment discussions between Granicus employees and current government employees are subject to several strict limitations. The general focus of these restrictions is to avoid the appearance of a “conflict of interest.” Granicus will not negotiate employment with a government employee while that employee is participating in a matter involving Granicus. Granicus employees must consult with Human Resources and the Legal Department prior to negotiating or entering into an employment relationship with current and former government employees.

Some former government employees are subject to a lifetime ban on appearing before their former government agencies on matters where they were personally and substantially involved, as well as a two-year ban covering matters within their official responsibility. Granicus employees, including former government personnel, will coordinate with HR and the Legal Department to determine which activities former government personnel are restricted from supporting. Hiring managers are expected to know that certain limitations may apply to the activities the employee would be able to perform before the employee joins the company.

GIFTS

A “gift” is defined as anything with a fair market value.

Government Employees and Officials (*Granicus Customers*)

Depending on the jurisdiction, gifts of a nominal value may be provided occasionally, to the extent an active or imminent procurement decision is not pending with the recipient. Gifts with more than a nominal value are prohibited without obtaining prior Legal Department approval. Also, certain states and local jurisdictions may require the provider of a gift to register as a lobbyist. In addition to registration, compliance with training requirements and reporting obligations is mandatory. **THE BEST PRACTICE IS NO GIFTS!**

Partners

The rules for Partners acting as prime contractors, such as a Granicus channel partner who has the contractual relationship directly with the customer, or those who are in a position to provide impartial advice to the Government are the same as the rules for Government Employees and Officials.

Third Parties And Gifts Received By Granicus Employees

Third parties include employees of non-government entities other than Partners in the category above.

Gifts, favors, casual entertainment of reasonable value (defined as less than \$50) or promotional materials such as pens, pencils, note pads, calendars, etc., may be accepted when they meet general standards of ethical business conduct, involve no element of concealment, and are accepted on a reciprocal basis where no obligation remains. Any employee who is uncertain as to whether a gift, favor or other item offered or given to the employee is acceptable should contact the Legal Department. Employees are also responsible for reporting any questionable activity to their supervisor, Human Resources and the Legal Department.

Charitable Donations and Political Contributions

Any charitable donations on behalf of Granicus, must be approved in advance by the CEO and the General Counsel.

Political contributions on behalf of Granicus are strongly discouraged. In rare circumstances, a political contribution may be made on Granicus's behalf, IF approved by the CEO and the General Counsel.

COMPLIANCE

Granicus employees are responsible for adhering to the standards set forth in this Code. If you are ever unsure about what action to take in any situation, including interactions with the government and government employees, you should seek guidance. Similarly, if you have concerns about any aspect of your compliance obligations or those of Granicus, you should talk to your supervisor or the company's Legal Department. Employees have a duty not only to comply with applicable law and Granicus policies and this Code, but to report any information that suggests that a violation may occur or has occurred. Further, any Granicus employee who is contacted by another employee expressing concerns about questionable practices must immediately report those concerns.

Reporting Violations and the Prohibition Against Retaliation

Any violation of this Code should be reported immediately to the Legal Department or Human Resources. The identity of the person or persons making a report will remain confidential except on a “need to know” basis. In the alternative, a violation may be reported anonymously in the manner outlined in the company’s Anonymous Reporting Policy:

Hotline Number: 1-833-547-0144

Website: www.Granicus.EthicsPoint.com

Moreover, a violation of Granicus’s non-retaliation policy will lead to discipline, including termination. If you suspect someone is retaliating against you, you should contact one of the resources above.

In addition, Granicus personnel shall make a report to the Legal Department whenever there is credible evidence in connection with a government contract or subcontract that Granicus has (1) received one or more significant government overpayments without making repayment; or (2) violated criminal law involving fraud, conflict of interest, bribery, or gratuities in relation to a government contract or subcontract; or (3) violated the U.S. False Claims Act.

Whistleblower Protections

Federal law¹⁴ provides additional whistleblower rights and protection for employees working on a federal government contract, subcontract, or grant. Specifically, companies that conduct business with the U.S. Federal Government (contractors/subcontractors and awardees/subawardees) are prohibited from a) discharging, b) demoting, or c) discriminating against employees who report what they reasonably believe is evidence of gross mismanagement of a Federal contract or grant. Disclosure could involve, but not be limited to, any of the following:

- gross mismanagement of a Federal contract or grant
- a gross waste of Federal funds
- an abuse of authority relating to a Federal contract or grant
- a substantial and specific danger to public health or safety
- a violation of law, rule, or regulation related to a Federal contract or grant (including the competition for or negotiation of a contract or grant)

In particular, the prohibition against retaliation applies when suspected mismanagement is disclosed to the following persons and/or entities:

- A. A Member of Congress or a representative of a committee of Congress
- B. An Inspector General
- C. The Government Accountability Office
- D. A Federal employee responsible for contract or grant oversight or management at the relevant agency
- E. An authorized official of the Department of Justice or other law enforcement agency
- F. A court or grand jury
- G. A management official or other employee of the contractor, subcontractor, or grantee who has the responsibility to investigate, discover, or address misconduct

Additionally, this Federal law establishes a new process for review of whistleblower reprisal complaints alleged by employees of contractors, subcontractors, and grantees when that employee believes he/she has been subjected to a reprisal prohibited by this law. Complaints may be submitted to the Inspector General of the executive agency involved, which are generally accessible on Agency Office of Inspector General (OIG) Hotline or Whistleblower Internet sites.

[10 U.S.C. 2409](#); [41 U.S.C. 4712](#); Public Law 114-261.

DISCIPLINE

Granicus's policy is to attempt to deal constructively with employee performance problems, unsatisfactory behavior, and employee errors. Granicus's discipline procedures are designed to provide a structured corrective action process to improve and prevent a recurrence of undesirable employee behavior.

Granicus provides employees with reasonable opportunities to correct performance or behavioral deficiencies when it is appropriate to do so. Depending on the circumstances, Granicus will follow the forms of corrective action which are described below. Because circumstances vary, each situation will be handled on an individual basis with factors such as the severity and frequency of the conduct considered. In some circumstances it may be appropriate to skip or repeat steps in the progression. In certain circumstances, immediate discharge without any prior progressive discipline may be warranted.

In general, Granicus will follow either a timebound performance improvement track, or a progressive discipline track; the decision on which path to follow depends on the nature of the issue(s) being addressed, and whether there's any amount of time associated to correcting the problem.

For performance and conduct violations that allow for timebound improvement; we will generally follow the below process:

- **Coaching** is provided at the discretion of a supervisor and does not constitute formal discipline. Typically, coaching is conducted with an employee prior to the issuance of formal discipline, although coaching is not a prerequisite to formal disciplinary action. For example, a supervisor may choose to coach in a situation where it appears to the supervisor that coaching may effectively resolve a performance deficiency without the need to resort to formal discipline. Feedback given in connection with periodic performance reviews may qualify as coaching.
- **Performance Improvement Plans (“PIPs”)** are generally used when, after coaching, an employee’s performance in a specific area, or areas, remains below expectations for their role. Performance Improvement Plans typically detail the specific areas in which the employee’s performance or conduct is not meeting expectations; summarize prior communications related to these deficiencies; and detail the expected improvements and the time frames for demonstrating improvement. Such plans also typically state that failure to demonstrate sufficient improvement during the plan period, and to sustain satisfactory performance and/or conduct thereafter may result in further action up to and including termination of employment without further corrective action. Any PIP will be maintained in the employee’s personnel file for further reference. An employee may write a rebuttal to a PIP and submit the rebuttal to be placed in the employee’s personnel file along with the PIP.

For all other performance and conduct violations, the progressive disciplinary process follows the sequence described below. Once an employee has received a step in the progressive discipline sequence, any violation of any policy (even if the violation is different in nature than any violation that triggered prior discipline) can lead to the next step in the progressive disciplinary process or to immediate termination. Attendance violations are subject to a separate progressive disciplinary process described by each team’s attendance policy.

- **Verbal Warning** is the first step in the formal progressive discipline process. The verbal warning is documented and will be maintained in the employee’s personnel file for future reference. An employee may submit a written rebuttal to a warning the employee received. Such a rebuttal will be placed in the personnel file along with the warning.
- **Written Warning** will be issued to the employee. Both the employee and the supervisor will sign the written warning. The written warning will be maintained in the employee’s personnel file for future reference. An employee may write a rebuttal to a written warning and submit the rebuttal to be placed in the employee’s personnel file along with the warning.

- **Final Warning** will be issued in writing to the employee. Both the employee and the supervisor should sign the final warning. The final warning will be maintained in the employee's personnel file for further reference. An employee may write a rebuttal to a final warning and submit the rebuttal to be placed in the employee's personnel file along with the warning.
- **Discharge** is the final step in the discipline process. Employees may be placed on paid or unpaid suspensions either for disciplinary purposes in connection with a Written or Final Warning, or to allow time for investigation of a potential performance or conduct issue. Suspension is not required prior to discharging an employee (with the appropriate approvals) or issuing a step of discipline.

The appropriate step of progressive discipline will typically be determined considering previous disciplinary action within the 12-month period preceding the most recent grounds for discipline. However, as stated above, disciplinary steps may be skipped or repeated depending on the circumstances of the situation, which means that Granicus may terminate an employee's employment, or take other disciplinary action, without following the sequence described above.

All documentation of past performance deficiencies may be used to determine whether an employee has a chronic or particularly serious performance or conduct issue that justifies an advanced disciplinary step. It is possible for someone to have more than one performance or conduct problem at a time or to demonstrate a pattern of repeated violations of the same or different kinds over time. Repeated violations of rules or policies may demonstrate a general inability or deliberate refusal to meet Granicus standards. Employees who are "repeat offenders" may be issued more advanced discipline, including termination of employment, without first progressing through other disciplinary steps, even if previous disciplinary action occurred more than 12 months earlier.

RESIGNATION/TERMINATION OF EMPLOYMENT

Employees are encouraged to provide at least two (2) weeks written notice of resignation of employment. Granicus may choose to end the employment relationship before the expiration of any notice period. Employees may not use flexible time off/paid time off during their notice period unless the flexible time off was requested and approved prior to notice of resignation or is taken for jury duty, bereavement, or sick leave or any other paid leave under applicable federal, state or local laws. Employees will receive their final pay in accordance with applicable law and Granicus policies. Employees must return all Granicus property immediately upon termination of employment.



GRANICUS, LLC

TIME OFF SUPPLEMENT

May 1, 2023

Version 4.0

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TIME OFF SUPPLEMENT

This Supplement outlines Leaves of Absence including the federal Family Medical Leave Act ("FMLA") as well as Granicus's Time Off benefits and practices in effect at the time the Supplement was issued. Note that Time Off benefits and practices are reviewed and revised from time to time and are subject to change without advance notice. For additional information about Leaves of Absence including FMLA or any Time Off benefits and practices, contact Human Resources.

COMPANY OBSERVED HOLIDAYS

Granicus currently observes the following holidays:

- New Year's Day
- Martin Luther King, Jr. Day
- President's Day
- Memorial Day
- Juneteenth
- Independence Day
- Labor Day
- US General Election Day
- Thanksgiving Day
- Friday after Thanksgiving
- Christmas Eve Day
- Christmas Day

Full-time employees are eligible to receive one full day's pay for each of these holidays. Part-time employees scheduled for less than 40 hours per week are eligible for pro-rated holiday pay based on the number of hours they are scheduled for. Part-time employees working less than twenty hours per week and temporary employees are not eligible for holiday pay.

Generally, when the holiday falls on Sunday, it will be observed on the following Monday; if the holiday falls on a Saturday, it will be observed on the preceding Friday. Reference Confluence for the final schedule. Employees who must work on a scheduled holiday may take another day off with pay with the approval of their supervisor.

FLEXIBLE TIME OFF

Granicus believes that time away from work is important for all employees. Given the nature of the work performed by our employees, we believe that employees are in the best position to determine when to work and when to take time away from work, while still responsibly performing the duties and responsibilities of their roles and managing their time effectively. This policy permits regular, full-time employees to take time off for vacation, non-extended illness, injury or preventative health care for themselves or their family members, personal business, appointments, personal or family issues, funerals or leisure, or for other purposes permitted by applicable law, so that they can maintain the quality and performance expected of Granicus employees.

Granicus does not accrue or set a specific number of days per year of time off. As time off is not accrued, there is no pay out of time off upon separation from employment.

Eligibility and Use

The paid Flexible Time-Off ("FTO") set forth in this policy applies to all regular full-time exempt and non-exempt U.S. employees. For these employees, this policy supersedes the prior applicable Paid Time Off ("PTO") policies. Leaves of Absence (including but not limited to, medical and family leaves such as the Family Medical Leave Act ("FMLA") and similar laws, short-term disability, long-term disability, workers' compensation, bereavement, jury duty and military leave) are governed by separate policies that will not be affected by this policy. In these instances, employees will need to work through Human Resources to coordinate a leave request. Failure to contact Human Resources may result in delayed payment or eligibility determination. Any approved Leave of Absence time will need to be tracked appropriately in the Human Resources Information System ("HRIS").

Part-time employees are not eligible for FTO but are entitled to Sick Leave as described below, or as otherwise required under applicable law.

For planned time away from work for reasons such as vacations and other personal matters, employees are expected to request approval from their manager's at least 30 days in advance when possible. Requests for FTO will be reviewed based on a number of factors, including business needs and staffing requirements. For unforeseeable time off (including Sick Leave time described below), employees are expected to provide as much advanced notice as practicable. Sick Leave requests will be addressed and recorded separately in accordance with the Sick Leave policy.

An employee's manager may determine that time away at the requested time is not appropriate given business needs and planned events. Approval of the FTO request is at the sole discretion of Granicus management. Granicus is confident that employees will continue to exercise good judgement in determining when to take time off, including giving appropriate consideration to others and not abusing this policy.

Absent special circumstances and where not prohibited by applicable law, FTO must be used in a minimum of two-hour increments.

Paid time off is paid at an employee's base pay rate, including shift differential pay for non-exempt employees, at the time of absence. It does not include overtime or special forms of compensation such as incentives, commissions, or bonuses.

It is the employee's responsibility to accurately report in HRIS all paid time off used for any purpose. Any employee who falsely reports or fails to accurately report paid time off in HRIS may be subject to discipline.

Generally, business demands limit an employee's ability to take extended periods of time away from work. Consequently, periods of time away from work should not exceed two (2) consecutive weeks at one time. Vacation or personal time off for greater than two (2) consecutive weeks will need to be submitted to HR and will require the appropriate C-Level approval and may require that the employee apply for a personal unpaid leave of absence. FTO is not eligible for use with, or to extend, FMLA leave or other extended leave of absences.

For non-exempt employees, any time exercised as FTO in any given workweek will not be counted as time worked in determining overtime eligibility.

This policy is intended to reinforce trust and using good judgment. If an employee's performance is not at an acceptable level or is being adversely impacted due to excessive time away from work, Granicus reserves the right to alter or revoke the use of this policy.

SICK TIME OFF

Granicus will provide all employees a separate benefit in the form of seven (7) Sick time off days per calendar year. These Sick days will be available on January 1 of each year. Sick time off does not accrue. Sick time balances do not roll forward from year to year unless required by applicable law for employees who are not eligible for FTO. Sick time balances are not paid out upon termination of employment. The Sick time available under this policy is separate from the FTO policy, and to the extent applicable law requires greater paid sick time than is provided by Granicus, the FTO policy shall be interpreted to comply fully with the accrual and usage requirements of any applicable paid sick time law.

If an employee requests time off for an extended illness greater than seven (7) days, Granicus may determine that a leave of absence is needed or may also ask that the employee obtain a doctor's release before he or she is allowed to return to work. Managers must alert Human Resources and the employee must work with a member of Human Resources to apply for an appropriate Leave of Absence pursuant to Leaves of Absence Policy and to coordinate FMLA or disability benefits if applicable and eligible. Available sick time may be used during a Leave of Absence to cover time that is otherwise unpaid. Sick time cannot be used to extend an approved leave of absence.

Retaliation or discrimination against an employee who asks to use sick time for purposes under applicable law is prohibited. Any employee who believes that Granicus has retaliated or discriminated against the employee for having requested or used sick time for purposes under applicable law has the right to file a complaint if leave is denied or to bring a civil action if the employee is retaliated against for requesting to take sick time under applicable law.

Sick time may be used for any purpose permissible under applicable law, including but not limited to time off to care for the employee's illness or the illness of an employee's family member, or as necessary due to domestic violence, sexual violence, abuse or stalking.

Granicus is committed to complying with all applicable federal, state and local laws related to paid time off. This policy will be interpreted and administered consistent with the requirements of applicable laws. In the event of any ambiguity or inconsistency between any policy language in this policy and applicable law, applicable law controls. For example, if a state or municipality requires sick time accrual greater than outlined in this policy, employees in that location will be provided sick time in accordance with applicable law.

Employees who have questions about FTO or Sick Time Off should contact Human Resources.

LEAVES OF ABSENCE

To apply for any leave offered by Granicus, employees should contact their supervisor or Human Resources. Employees who apply for a leave will be asked to state why they want the leave, when they want the leave to begin and when they want the leave to end. Granicus, or a Granicus authorized third party management system, will inform employees what type and duration of leave, if any, has been approved and will also tell them what requirements, such as certification of a health condition, they must fulfill.

All leaves are granted for a specific period of time. Employees who foresee being unable or unwilling to return to work at the end of the leave period should apply for any other leave for which they may be eligible, including an extension of the current leave. Employees who do not return to work at the end of an approved leave period, including any extensions, may be terminated as of the date the leave ends.

Leaves of absence or other time off is governed by various laws and Granicus will comply with applicable law. Employees who need time off that is in addition to or is not covered under the provisions of this Handbook or any Supplement should contact Human Resources to determine whether any other type of leave is available at their work location.

FAMILY AND MEDICAL LEAVE

As used in this policy statement, "FMLA leave" means the leave required by the federal Family and Medical Leave Act.

Eligibility Requirements

Subject to certain conditions, employees are eligible for FMLA leave if (1) they have worked for Granicus for at least one year, (2) they have worked for Granicus for at least 1,250 hours during the 12 months immediately preceding the start of FMLA leave, and (3) Granicus employs at least 50 employees within 75 miles of the employee's work site.

An eligible employee may take FMLA leave if the leave is taken for an FMLA-qualifying reason and the employee has not exhausted the employee's leave entitlement in the applicable 12-month period.

Basic Leave Entitlements

Eligible employees are entitled to up to 12 weeks of unpaid, job-protected leave, per 12-month period, for the following reasons:

- For incapacity due to pregnancy, prenatal medical care or child birth;
- To care for the employee's child after birth or placement for adoption or foster care;
- To care for the employee's spouse, son, daughter or parent who has a serious health condition;
- For a serious health condition rendering the employee unable to perform their job; or
- Because of any Qualifying Exigency (see Military Family Leave Entitlements, below).

For purposes of FMLA leave based on any of the reasons described above, the 12-month period is a "rolling" 12-month period measured backward from the date an employee uses any FMLA leave.

Military Family Leave Entitlements

- **Qualifying Exigency Leave**

Eligible employees whose spouse, son, daughter or parent is on covered active duty or call to covered active duty status may use their 12-week FMLA leave entitlement to address certain qualifying exigencies. Qualifying exigencies may include attending certain military events, arranging for alternative childcare, addressing certain financial and legal arrangements, attending certain counseling sessions, and attending post-deployment reintegration briefings.

- **Military Caregiver Leave**

In addition to the basic types of leave entitlements listed above, the FMLA includes a special leave entitlement that permits eligible employees who are the spouse, son, daughter, parent, or next of kin of a covered servicemember to take up to 26 weeks of leave during a single 12-month period to care for that covered servicemember. The single 12-month period begins on the first day an employee takes military caregiver leave and ends 12 months after that date.

A covered servicemember for purposes of military caregiver leave is: (1) a current member of the Armed Forces, including a member of the National Guard or Reserves, who is undergoing medical treatment, recuperation or therapy, is otherwise in outpatient status, or is otherwise on the temporary disability retired list, for a serious injury or illness; or (2) a veteran who was discharged or released under conditions other than dishonorable at any time during the five-year period prior to the first date the eligible employee takes FMLA leave to

care for the covered veteran, and who is undergoing medical treatment, recuperation, or therapy for a serious injury or illness.

The FMLA definitions of "serious injury or illness" for current servicemembers and veterans are distinct from the FMLA definition of "serious health condition".

Definition of Serious Health Condition

A serious health condition is an illness, injury, impairment, or physical or mental condition that involves either an overnight stay in a medical care facility or continuing treatment by a health care provider for a condition that either prevents the employee from performing the functions of the employee's job or prevents the qualified family member from participating in school or other daily activities.

Subject to certain conditions, the continuing treatment requirement may be met by a period of incapacity of more than three consecutive calendar days combined with at least two visits to a health care provider or one visit and a regimen of continuing treatment, or incapacity due to pregnancy, or incapacity due to a chronic condition. Other conditions may meet the definition of continuing treatment.

Employee Responsibilities

Employees must contact Human Resources to request leave. Employees must provide 30 days' advance notice of the need to take FMLA leave when the need is foreseeable. When 30 days' notice is not possible, the employee must provide notice as soon as practicable and generally must comply with Granicus's normal call-in procedures in accordance with the Attendance and Punctuality Policy.

Employees must provide sufficient information for Granicus to determine if the leave may qualify for FMLA protection and to determine the anticipated timing and duration of the FMLA leave. Sufficient information may include that the employee is unable to perform job functions, the family member is unable to perform daily activities, the need for hospitalization or continuing treatment by a health care provider, or circumstances supporting the need for military family leave. Employees also must inform Human Resources if the requested leave is for a reason for which FMLA leave was previously taken or certified.

If an employee fails to comply with the responsibilities described above, FMLA leave may be denied or delayed. If FMLA leave is denied or delayed, and the employee misses or has

missed work anyway, the employee's absences could result in discipline or termination of employment unless the absences are covered by another type of job-protected leave.

Certification and Recertification

Employees may be required to provide a certification and periodic recertification supporting the need for leave.

When an employee requests FMLA leave due to the employee's own serious health condition or the serious health condition of a family member, Granicus may require the employee to submit a certification from the applicable health care provider. Additionally, when an employee requests leave due to a qualifying exigency or leave to care for a covered servicemember with a serious injury or illness, Granicus may require certification in support of the request. Human Resources will provide the appropriate certification form when FMLA leave is requested or applicable.

Where FMLA leave is taken because of an employee's own serious health condition or the serious health condition of a family member and Granicus has reason to doubt the validity of a certification, Granicus may require a second and, in some cases, a third opinion, as allowed under the FMLA. Granicus may also require that the employee, at the employee's expense, obtain recertification by the applicable health care provider as allowed under the FMLA.

An employee returning from an FMLA leave of 10 or more work days due to the employee's own serious health condition must provide a fitness for duty certification in order to be restored to employment.

Granicus's Responsibilities

Granicus will inform employees requesting leave whether they are eligible under FMLA. If they are eligible for FMLA leave, Granicus will notify employees of any additional information, including medical or other certification, that Granicus requires to approve the FMLA leave as well as notify employees of their rights and responsibilities. If an employee is not eligible, Granicus will notify the employee of a reason for the ineligibility.

Granicus will inform the employee if leave will be designated as FMLA-protected and the amount of leave counted against the employee's leave entitlement. If Granicus determines that the leave is not FMLA-protected, Granicus will notify the employee of this fact.

Use of Leave

Employees do not need to use their entire FMLA leave entitlement in one block. When medically necessary, leave may be taken intermittently or on a reduced leave schedule. Leave due to qualifying exigencies may also be taken on an intermittent basis or reduced schedule. If Granicus, in its sole discretion, consents, leave taken after the birth of a healthy child or placement of a healthy child for adoption or foster care may be taken intermittently or through a reduced work schedule. An employee's entitlement to FMLA leave for a birth or placement expires at the end of the 12-month period beginning on the date of the birth or placement of the child.

If an employee requests intermittent leave or leave on a reduced schedule that is foreseeable due to planned medical treatment, including during a period of recovery from a serious health condition, the employee may be temporarily transferred to another position if the position has equivalent pay and benefits and better accommodates the recurring periods of leave, to the extent permitted by applicable law.

When planning medical treatment, an employee must consult with Granicus and make a reasonable effort to schedule the treatment so as not to disrupt unduly Granicus's operations, subject to the approval of the health care provider.

Substitution of Paid Leave for Unpaid Leave

While FMLA alone is unpaid, job protected leave, there are other forms of wage replacement that could apply during a leave of absence. Where applicable and permissible, FMLA leave will run concurrently with parental leave and other types of paid or unpaid leave (e.g. workers compensation leave and disability leave) that are required by state or other law. Generally, FTO cannot be used during FMLA or other forms of leave of absence.

Benefits and Protections

Use of FMLA will not result in the loss of any employment benefit that accrued prior to the start of an employee's leave.

During FMLA leave, Granicus will maintain an employee's health coverage under any group health plan on the same terms as if the employee had continued to work. Missed premiums will accrue. Employees will coordinate with payroll/benefits teams to arrange repayment of missed premiums or to make arrangements to continue to pay their share of premiums during FMLA leave.

To the extent permitted by Granicus's insurance policies, Granicus will also maintain in effect group disability, life, dental, vision, cancer and critical care coverage but the employee is responsible for paying the employee's regular share on the same schedule as health coverage costs are paid.

If the employee does not, for reasons within the employee's control, return from leave and work at least 30 calendar days, Granicus has the right to seek reimbursement for its share of health plan premiums that it paid during any unpaid portion of the leave.

In most circumstances, upon return from FMLA leave employees will be restored to their original or equivalent positions with equivalent pay, benefits, and other employment terms. If, however, during the FMLA leave an event occurs that would have terminated or altered the employment of the employee had the employee not been on leave (e.g., a reduction in force, elimination of a shift), the employment, leave rights, employment conditions, or restoration rights of that employee will terminate at the same time as if the employee had not been on leave.

Complaint Procedure

Granicus encourages any employee who believes that the FMLA leave law has been violated to report the problem to Human Resources. All complaints will be promptly investigated.

Prohibited Acts and Enforcement

FMLA makes it unlawful for any employer to:

- Interfere with, restrain, or deny the exercise of any right provided under FMLA; and
- Discharge or discriminate against any person for opposing any practice made unlawful by FMLA or for involvement in any proceeding under or relating to the FMLA.

An employee may file a complaint with the U.S. Department of Labor or may bring a private lawsuit against an employer.

FMLA does not affect any federal or state law prohibiting discrimination or supersede any state or local law or collective bargaining agreement which provides greater family or medical leave rights.

MILITARY LEAVE

Granicus complies with the Uniform Services Employment and Reemployment Rights Act ("USERRA") and applicable state law pertaining to military leave. Employees who are required to fulfill military obligations in any branch of the Armed Forces of the United States or in state military service will be given the necessary time off and reinstated in accordance with applicable law. Accrued vacation may be used for this leave if the employee chooses. Military orders should be presented to Human Resources and arrangements for leave made as early as possible before departure. Employees must notify Human Resources of their intent to return to employment as required by applicable law. No attempt is made in this policy to cover all possible situations and circumstances that may arise in connection with the military service of an employee. Therefore, as military leave situations arise, employees should consult with Human Resources for complete details regarding their military leave rights.

PAID PARENTAL LEAVE

As used in this policy statement, "Paid Parental Leave" means the leave available to eligible employees under this Paid Parental Leave Policy.

Eligibility and Use Requirements

Granicus employees are eligible for Paid Parental Leave if (1) they have worked for Granicus for at least twelve months, (2) they have worked for Granicus for at least 1,250 hours during the 12 months immediately preceding the start of the leave, (3) are regularly working 40 or more hours per week at the time of the birth of a biological child or the adoption of a child, (4) they are a custodial parent of the child at the time of the leave (verification of parenthood, placement for adoption, or actual adoption and of custody may be required to establish eligibility, depending upon the circumstances), (5) in the case of adoptions, they are adopting a child who is age 18 or younger as of the date of filing of the adoption placement date, and (7) they return to work for at least one week following the use of Paid Parental Leave.

If the child has two custodial parents and both are Granicus employees, then each custodial parent is eligible for Paid Parental Leave under the terms of this Paid Parental Leave Policy.

Paid Parental Leave is a benefit and is not counted toward regular wages. Unused Paid Parental Leave may not be used to extend a separation date and will not be paid out upon separation from employment.

Employees receive Paid Parental Leave for the purpose of caring for and bonding with the newborn biological or adopted child or children. Any employee on Paid Parental Leave who engages in activities inconsistent with the stated need for leave during the period of leave will forfeit further Paid Parental Leave benefits and will be subject to disciplinary action up to and including termination of employment.

Leave Entitlement: Birth Parent

Eligible employees who are giving birth (here on out referred to as the "birth parent") are entitled to use Supplemental Paid Leave (see below policy) for ten (10) days during the mandatory elimination period for Short Term Disability to recover from the physical disability of childbirth. Birth parents are then entitled to up to 4-6 weeks of Short-Term Disability. At the conclusion of the Short-Term Disability benefit, birth parents are eligible to use thirty (30) business days (240 hours for hourly non-exempt employees) of Paid Parental Leave (as described below of non-birth parents). Paid Parental Leave must be used during the first six (6) months following the child's birth, except that in the case where the child must remain in the hospital longer than the birth parent in which case Paid Parental Leave must be used within six (6) months after the child leaves the hospital. Paid Parental Leave is not available for use after the expiration of the applicable six (6) month period, regardless of whether any other paid or unpaid parental leave under Granicus policy or applicable federal, state or local law may be available after such date.

Leave Entitlement: Non-Birth Parent

Eligible employees who are the parent not giving birth, or the adoptive parent (here on out referred to as the "non-birth parent") are entitled to use thirty (30) business days (240 hours for hourly non- exempt employees) of Paid Parental Leave starting from the day of birth or day of adoption placement. Paid Parental leave for non-birth parents must be used during the first six (6) months following the child's birth or adoption placement, except in the case where the child must remain in

the hospital longer than the birth parent or the adoption placement involves a child who is in the hospital at the time of the placement, Paid Parental Leave must be used within six (6) months after the child leaves the hospital. Paid Parental Leave is not available for use after the expiration of the applicable six (6) month period, regardless of whether any other paid or unpaid parental leave under Granicus policy or applicable federal, state or local law may be available after such date.

Scheduling of Leave

An employee wishing to use Paid Birth Parent or Paid Parental Leave must notify his or her supervisor in writing at least 30 days prior to the commencement of the leave, unless the need for the leave is not foreseeable that far in advance, in which case the employee must provide as much advance notice as possible under the circumstances. Unless otherwise communicated in advance to the Human Resources team, Paid Parental Leave and Paid Birth Parent Leave must be used in one continuous period of leave.

Coordination of Paid Parental Leave and Other Forms of Approved Leave and FTO

Employees who qualify for Paid Parental Leave may also qualify for Parental leave under Granicus's FMLA Policy, one of the Supplements to the Handbook, and under applicable federal, state or local law. Paid Parental Leave will run concurrently with Parental leave under the FMLA Policy and, wherever permitted by law, with Parental or other childbirth or adoption related leave provided for under an applicable Supplement or under any applicable federal, state or local law.

An eligible birth parent will use Supplemental Paid Leave to receive pay after the birth of the baby during the waiting period for Short-Term Disability benefits. For employees who qualify for Short-Term Disability benefits or for any form of paid Parental or other childbirth or adoption related leave provided under an applicable supplement or under any applicable federal, state or local law, Granicus' Paid Parental Leave will be applied after any eligible disability benefit and concurrently with any other forms of paid parental leave as a top-up to cover 100% of normal pay.

All eligible employees, birth parents and non-birth parents, will not be eligible to use Flexible Time Off in conjunction with Paid Parental Leave or Unpaid Parental Leave and are not able to use FTO until their supplemental FMLA period is over.

If an employee fails to return to work for at least one week after the conclusion of Paid Parental Leave (including after the conclusion of any additional leave time related to the birth or adoption of a child that was approved under other Granicus leave policies), then the time away from work will be treated as unpaid and certain disciplinary actions may be taken.

SUPPLEMENTAL PAID LEAVE

As used in this policy statement, "Supplemental Paid Leave" means the leave available to eligible employees under this Supplemental Paid Leave Policy.

Leave Entitlement

This policy permits regular, full-time employees to take protected time off for extended illness, injury or preventative health care for themselves or their family members, personal or family issues, or for other purposes. Eligible employees who need paid time off for any type of leave of absence may be entitled to use up to ten (10) days (80 hours for hourly non-exempt employees) of Supplemental Paid Leave. Supplemental Paid Leave must be used in conjunction with an approved Leave of Absence for reasons including, but not limited to, covering elimination periods for other leaves, to extend other types of leaves, or to be used in lieu of other leaves of absences when an employee is not eligible. This paid leave can be used in conjunction with another benefit or independently.

Eligibility and Use

Supplemental Paid Leave set forth in this policy applies to all regular full-time exempt and non-exempt U.S. employees. Leaves of Absence (including but not limited to, medical and family leaves such as the Family Medical Leave Act ("FMLA") and similar laws, short-term disability, long-term disability, workers' compensation, bereavement, jury duty and military leave) are governed by separate policies that will not be affected by this policy. Supplemental Paid Leave is made to be used in conjunction with Leaves of Absences as needed. In these instances, employees will need to work through Human Resources to coordinate a leave request. Failure to contact Human Resources may result in delayed payment

or eligibility determination. Any approved Leave of Absence time will need to be tracked appropriately in UKG and any other Granicus approved third party system.

Part-time employees are not eligible for Supplemental Paid Leave.

For planned time away from work for reasons such as medical, familial, and other personal matters, employees are expected to request approval from the Human Resources team at least 30 days in advance when possible. Requests for Supplemental Paid Leave will be reviewed based on a number of factors, including business needs and staffing requirements.

Human Resources may determine that time away at the requested time is not appropriate given other types of leave that the employee is eligible for. Approval of the Supplemental Paid Leave request is at the sole discretion of Granicus HR, based on eligibility and determined factors that are outlined in this policy. Granicus is confident that employees will continue to exercise good judgement in determining when to take time off, including giving appropriate consideration to others and not abusing this policy.

Supplemental Paid Leave is paid at an employee's base pay rate, including shift differential pay for non-exempt employees, at the time of absence. It does not include overtime or special forms of compensation such as incentives, commissions, or bonuses.

It is the employee's responsibility to work with Human Resources to accurately report in UKG all paid time off used for any purpose. Any employee who falsely reports or fails to accurately report paid time off in UKG may be subject to discipline.

Granicus is committed to complying with all applicable federal, state and local laws related to paid time off. This policy will be interpreted and administered consistent with the requirements of applicable laws. In the event of any ambiguity or inconsistency between any policy language in this policy and applicable law, applicable law controls.

Employees who have questions about Supplemental Paid Leave should contact Human Resources.

GENERAL LEAVE OF ABSENCE

Employees who must be away from their job for greater lengths of time than Granicus's standard leave policies allow may request a general leave of absence without pay. During a general leave of absence, employees will not be eligible for any of the benefits of a full-time employee. Whether to grant such a leave and the conditions of any such leave that is granted will be decided in the sole discretion of Granicus. Employees might not be guaranteed a return to the same job.

JURY DUTY

Full-time or part-time employees will be paid their base salary during an active period of jury duty up to a maximum of ten working days per calendar year (unless applicable state law requires a longer period of paid leave in connection with jury duty). Temporary employees will be provided time off without pay while serving jury duty. All employees are allowed unpaid time off if summoned to appear in court as a witness. To qualify for jury or witness duty leave, employees must submit to their supervisors and Human Resources representatives a copy of their jury duty summons as soon as it is received. In addition, employees must submit proof of service to their supervisors and Human Resource representatives when their period of jury or witness duty is complete. Employees are expected to report to work on any regular work day when their services as a juror are not required.

BEREAVEMENT LEAVE

Bereavement leave with pay will be granted in the event of the death of an employee's relative or relative-in-law as indicated in the tiers below. If an extended absence is required, employees may request to use Flexible Paid Time off or a general leave of absence without pay may be requested.

# Days	Relation
Up to 10	significant other, child, or another relative considered to be a direct dependent
Up to 5	parent, sibling, or another relative considered to be next of kin
Up to 3	grandparent, aunt, uncle, or another relative considered to be part of the extended family



GRANICUS, LLC

EMPLOYEE BENEFITS SUPPLEMENT

May 1, 2023

Version 4.0

EMPLOYEE BENEFITS SUPPLEMENT

This Supplement generally describes Granicus's employee benefits in effect at the time the Supplement was issued. Note that benefits are reviewed and revised from time to time and are subject to change without advance notice. In addition, many of the benefits described below are governed by insurance policies, summary plan descriptions, or benefit plans. In case of any inconsistencies between the information in the Handbook or Supplements and the insurance policies, summary plan descriptions, or benefit plans, the insurance policies, summary plan descriptions, or benefit plans will control. For additional information about any of the benefits, contact Human Resources.

Granicus provides benefits for its eligible employees. Eligible employees are full-time and part-time employees (working a minimum of 20 hours per week); temporary employees are only eligible to participate in the Granicus 401(k) Savings Plan.

Whenever possible Granicus will provide domestic partners the same insurance benefits as the spouse of an employee would be eligible to receive. For purposes of this Handbook, domestic partners are defined as the same or opposite sex domestic partners in a spouse-like relationship who have met all of the following requirements for at least 12 months:

- Reside together in the same permanent residence;
- Intend for the domestic partnership to be permanent; are financially interdependent such that they are jointly responsible for the common welfare and financial obligations of the household, or the non-employee domestic partner is chiefly dependent upon the employee for care and financial assistance;
- Are neither legally married to any other individual and if previously married, a legal divorce or annulment has been obtained or the former spouse is deceased;
- Are mentally competent to enter into a contract according to the laws of the state in which they reside;
- Are at least 18 years of age and are old enough to enter into marriage according to the laws of the state in which they reside;
- Do not have a blood relationship that would bar marriage under applicable laws of the state in which they reside if they otherwise satisfy all other applicable state marriage requirements; and
- Are not in a relationship solely for the purpose of obtaining benefits.

MEDICAL, DENTAL, AND VISION INSURANCE

Eligible employees and their dependents may elect to participate in Granicus's health, dental, and vision insurance plans starting on the employee's date of hire. Granicus will pay a percentage of the monthly premiums; the employee is responsible for the remaining amount. Telemedicine is available to all medical plan members as an extension of your medical plan.

FLEXIBLE SPENDING AND HEALTH SAVINGS ACCOUNTS

Employees can elect to participate in the Medical, Limited Purpose, and/or Dependent Care Flexible Spending Accounts and Health Savings Accounts.

LIFE, DISABILITY, ACCIDENT INSURANCE, AND CRITICAL ILLNESS

Granicus subsidizes the premiums for employee group term life and accidental death and dismemberment insurance, as well as short-term and long-term disability insurance. The employee is not responsible for the premiums of these coverages. Voluntary life insurance is also available for employee, spouse, and dependents. An employee who enrolls in voluntary life coverage is 100% responsible for premiums. Granicus subsidizes the cost of accident and critical illness coverage for employees enrolled in the Granicus high-deductible health plan.

WELLNESS AND MENTAL HEALTH

Granicus offers various resources and benefits focused on employee wellness. Employees have access to various third-party mental health benefits. Basic services offered at no cost to the employee. Additional details about these benefits can be found in the Granicus Summary of Benefits.

RETIREMENT PROGRAM

Granicus offers a 401(k) Plan with a match up to a specified amount of the employee's contributions to the plan. See the Summary Plan Description for additional information.

Any employee eligible to contribute into Granicus' 401(k) plan has access to a company paid financial wellness platform.

LEGAL ASSISTANCE

Eligible employees may elect to participate in a Group Legal plan that provides access to an attorney in a number of different legal cases. The employee is responsible for the cost of the monthly premium. See the Summary Plan Description for additional information.

PET, HOME, AND AUTO

Employees may elect to enroll in discounted pet, home, and auto insurance. Premiums for these coverages are the responsibility of the employee.

COMMUTE OR WORK FROM HOME BENEFIT

Employees who work in a Granicus office are eligible for commute assistance that is location specific commute assistance or a work from home reimbursement.

PROFESSIONAL DEVELOPMENT

Employees have access to a number of internal tools and online learning platforms to aid in career growth.



GRANICUS, LLC

U.S. STATE SUPPLEMENTS

May 1, 2023

Version 4.0

STATE SUPPLEMENTS

Please review your applicable state supplement to the Employee Handbook.

**Please note that not all states have a supplement listed below.*

[California State Supplement](#)

[Colorado State Supplement](#)

[Connecticut State Supplement](#)

[District of Columbia Supplement](#)

[Georgia State Supplement](#)

[Illinois State Supplement](#)

[Massachusetts State Supplement](#)

[Maryland State Supplement](#)

[Maine State Supplement](#)

[Michigan State Supplement](#)

[Minnesota State Supplement](#)

[New Jersey State Supplement](#)

[Nevada State Supplement](#)

[New York State Supplement](#)

[Oregon State Supplement](#)

[Rhode Island State Supplement](#)

[South Carolina State Supplement](#)

[Virginia State Supplement](#)

[Vermont State Supplement](#)

[Washington State Supplement](#)

[West Virginia State Supplement](#)

EMPLOYEE HANDBOOK ACKNOWLEDGEMENT FORM

I have received a copy of the Employee Handbook ("Handbook"), the Time Off Supplement, the Employee Benefits Supplement, and any location-specific Supplements that apply to me (collectively, "Supplements"), which outline current personnel practices, policies, plans, programs and procedures (the "Personnel Policies") of Granicus, LLC ("Granicus"). I understand that in the event I work in a state that provides greater benefits or protections to me than what is identified in the Handbook and Supplements, then applicable state law applies.

I understand that it is my responsibility to read and become familiar with the information contained in the Handbook, Supplements or any other Personnel Policies, and any revisions made to them. I understand that the Handbook and Supplements are intended as reference documents containing general employment guidelines and do not necessarily represent all guidelines and practices of Granicus. I further understand that the language contained in the Handbook, Supplements or any other Personnel Policies, and other guidelines or policy statements of Granicus do not create a contract of employment. I am aware that the information in the Handbook, Supplements and any other Personnel Policies are subject to change from time to time without prior notice, that the Handbook, Supplements and any other Personnel Policies and their contents revoke and supersede any and all previous statements on similar subjects, and that Granicus may deviate from the policies in individual circumstances in its discretion. Notwithstanding the foregoing, if Granicus and I have entered into any written agreements, including, but not limited to, any agreement addressing the protection of confidential information, assignment of intellectual property or restrictive covenants, the Handbook, Supplements or any other Personnel Policies do not replace or supersede the terms of those agreements. To the extent that the policies in the Handbook or any Supplement or any other Personnel Policies conflict with the terms of such an agreement, the terms of the written agreement will control.

I understand that my employment is at-will, which means that neither I nor Granicus is bound to continue the employment relationship, and that either I or Granicus may end the relationship at any time for any reason without notice. I further understand that nothing in the Handbook, Supplements or any other Personnel Policies modify the at-will employment relationship between me and Granicus.

I agree in accepting or continuing employment with Granicus to abide by its policies, procedures and practices and understand that failure to comply with Granicus's policies, procedures and practices may result in the termination of my employment.

Employee Signature _____

Employee Name (Printed) _____

Date _____