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Our Control**

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**You Can Stake Your
Claims on Us**

US CAT ADJUSTERS, LCC COMPANY POLICIES AND PROCEDURES

Human Resources 2010

US CAT ADJUSTERS, LLC COMPANY POLICIES AND PROCEDURES

Welcome to US Cat Adjusters. We are pleased you have decided to join our team! The following pages are intended to provide general information regarding US Cat's procedures and policies. These policies apply to US Cat's employees, independent contractors, examiners, and temporary personnel (collectively referred to as "employee(s)").

HUMAN RESOURCE RELATED POLICIES

US Cat has zero tolerance for unlawful workplace harassment, discrimination, substance abuse, and the misuse of our information systems. All personnel must adhere to a professional dress code. All employees, adjusters and independent contractors are expected to adhere to these policies. Current professional conduct policies are provided as follows:

DRUG FREE WORKPLACE

US Cat is a drug-free workplace. We prohibit the use of non-prescribed drugs or alcohol during work hours. If an employee comes to work under the influence of drugs or alcohol or uses drugs or alcohol during work time, the employee will be disciplined in accordance with the policy up to and including termination. In an effort to meet its commitment to employee safety US Cat has established a policy to test employees for drugs. As a condition of employment, all employees are required to fully comply with the provisions of the Drug Free Workplace Policy. Questions concerning the application or interpretation of the Policy should be directed to the COO.

UNLAWFUL HARASSMENT AND DISCRIMINATION

US Cat is committed to maintaining a work environment free from unlawful harassment and discrimination and in which all employees can devote their full attention and best efforts to the job. US Cat will not tolerate any form of harassment based on age, race, color, religion, sex, national origin, disability, marital status or any other characteristic that is protected by law.

This policy applies to management and non-management employees alike. It also applies to non-employees who harass employees.

Unlawful discrimination and harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her age, race, color, religion, sex, national origin, disability, marital status or any other legally protected characteristic that: (1) has the purpose or effect of creating an intimidating, hostile or offensive work environment; (2) has

the purpose or effect of unreasonably interfering with an individual's work performance; or (3) otherwise adversely affects an individual's employment opportunities, including but not limited to placement, training, job assignments, transfers, promotions, compensation, benefits, and any other status change.

A. Sexual Harassment

Sexual harassment (whether opposite-sex or same-sex) is strictly prohibited. Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when submission to or rejection of this conduct explicitly or implicitly affects an individual's employment, unreasonably interferes with an individual's work performance or creates an intimidating, hostile or offensive work environment. Examples of the types of behavior that may be considered sexual harassment in violation of this policy include the following:

- Sexually offensive jokes or comments
- "Sexist" comments or behavior (conduct that demeans other individuals because of their sex, even if not vulgar, lewd, or sexually provocative)
- Physical assaults or other touching that is sexual in nature
- Promising favorable treatment or threatening unfavorable treatment based on the employee's response to sexual demands
- Displays of sexually oriented reading materials or pictures, including electronic materials
- Punishing an employee for complaining about sexual harassment, including but not limited to, any of the above.

B. Harassment and Discrimination Based on Age, Race, Color, Religion, Sex, National Origin, Disability, or Marital Status

Harassment and discrimination based on these characteristics deserves special mention and is also strictly prohibited. Examples of the types of behavior that will be considered harassment or discrimination based on these characteristics include the following:

- Jokes or negative comments about these characteristics
- Displays of reading materials or pictures containing negative material about these characteristics, including electronic materials
- Vandalism or "pranks" based on these characteristics
- Failure to provide training or grant a promotion based on these characteristics

CODE OF ETHICS

US Cat Adjusters requires all employees to conduct themselves in a professional manner at all times. The following applies while in the office or in the field:

- Adjusters are not permitted to possess any type of weapon while on any policyholder's property or in any US Cat office.
- Adjusters are not permitted to adjust claims pertaining to family members or close personal or business acquaintances.

- Having a relationship with a client, employee, or insured that qualifies as a conflict of interest is prohibited.
- Socializing with insureds is prohibited.
- Accepting gratuities, meals, tips, or any form of payment from an insured, contractor, supplier or any third party that is, or could be interpreted to be, intended to influence the handling of a claim, or could be interpreted as an expression of gratitude is strictly prohibited.
- Giving a gift to a client, employee, insured, contractor, supplier or any third party is strictly prohibited.

APPEARANCE AND DRESS CODE

Clients, the public, customers and your peers develop lasting impressions of US Cat from your appearance and dress. The following information is intended to serve as a guide to help define appropriate business wear for all US Cat employees. Our primary objective is to have employees project a well groomed and professional image at all times. US Cat's dress is business casual. However, not all casual attire is appropriate for the office or field. Regardless of the item, it is essential to avoid wearing anything that is excessively worn, frayed or wrinkled. Listed below is a general overview of acceptable business casual wear as well as a listing of some of the more common items that are not appropriate for the office or field. Neither group is intended to be all inclusive. Rather, these items should help set general parameters for proper business casual attire and allow you to use good judgment about items that are not specifically addressed. A good rule of thumb is if you are not sure if something is acceptable, choose something else to wear

Slacks – Cotton slacks are acceptable provided they are clean and wrinkle free. Inappropriate items include jeans (except when specifically allowed), sweatpants, shorts, bib overalls, spandex or other form-fitting pants, pants that are excessively revealing, and pants that are worn and faded.

Shorts – Casual shirts with collars, golf shirts, sweaters and turtlenecks are acceptable. T-shirts, sweatshirts, tank tops, halter tops, tube tops or any tops with spaghetti straps unless worn with a jacket or sweater are unacceptable.

Dresses and Skirts – Casual dresses and skirts, jean skirts and mid-length split skirts are acceptable. Miniskirts and spaghetti strap dresses are unacceptable.

Footwear – Loafers, boots, flats, dress sandals and leather deck shoes are acceptable. Casual socks or even no socks or stockings are acceptable if it is appropriate for the rest of the outfit. However, sneakers and slippers may only be worn for medical reasons provided medical documentation is submitted. Athletic shoes, sneakers, slip flops and slippers are unacceptable.

Field Adjusters are required to wear:

- Docker/Chino style pants. No blue jeans are permitted. Keep in mind darker colors hide dirt better than lighter colors and help promote a more professional appearance.

- A colored polo shirt (golf shirt) or a collared button down shirt. Both long and short sleeves are permitted. No loud colors or patterns are permitted; e.g. Hawaiian shirt. Specialty long sleeve light fabric shirts (SPF/UPF protective shirts) are recommended to provide sunburn protection.
- Appropriate shoes adequate for climbing roofs. For maximum safety, the use of Cougar Paws or equivalent footwear is strongly recommended for climbing roofs.

Employees deemed improperly dressed may be warned not to wear the item or clothing again or may be sent home immediately with no warning. Violations of this policy may result in disciplinary action up to and including termination of employment.

WORKPLACE ENVIRONMENT

Smoking is not permitted on any client's or insured's property or in the office. All work spaces are to remain orderly and company equipment should be handled with permission and with care. Eating and drinking are permitted only in designated areas and never at the work station. Please be considerate of your co-workers and keep your voices as low as possible when communicating with others while in the office. Personal cell phone calls, except emergencies, are not permitted at the work station. Cell phone calls are permitted during breaks and lunch time. No music is allowed at the work station. Ear buds may be used to listen to music with management's approval.

WORK HOURS

Field adjuster work hours and scheduling are the responsibility of the adjuster. However, it is recommended that each adjuster allow enough time to complete an average of 3-5 claims per day. Adjusters are not to leave the storm site without the prior approval of his or her supervisor. Any adjuster found to have left without permission risks having his or her files reassigned.

Office personnel are expected to be able to work seven (7) days per week, twelve (12) hours per day, including additional hours and holidays or as directed. Breaks include one 10 minute break every two hours. (Additional smoking breaks will NOT be permitted outside of standard break periods.) Specific work day schedules will be established based on each storm situation.

CONFIDENTIALITY

All files, claims, reports, documents, photographs and any other material created while working for US Cat is considered to be confidential and proprietary property of US Cat. Client information, insured information, company information and associate information are considered confidential as well. Such information must be kept strictly confidential. It is the employee's responsibility to protect and secure such information at all times. At no time should any employee share personal or business information without written permission from the management of US Cat.

INFORMATION SYSTEM POLICY

A. Purpose

US Cat considers access to electronic information resources to be a privilege granted on the condition that each employee uses these resources responsibly, and in accordance with professional standards. This section provides guidelines for appropriate use of electronic information systems and services at US Cat. It is not a comprehensive document covering all aspects of use. It offers principles to help guide employees of US Cat regarding the responsible use of electronic information systems and describes professional standards that must be observed.

The policies and guidelines outlined apply to all US Cat's systems and our client's systems, whether on-site and connected directly or off-site and connected by telephone system or other means. The policies and guidelines cover these systems no matter who is the owner or the method of connection to the network. Employees and registered users are responsible for their own actions, as well as for the actions of any person they permit to access a US Cat or client system.

B. Definitions

Electronic Communications shall mean and include the use of information systems in the communicating or posting of information or material by way of electronic mail, bulletin boards, World Wide Web (Internet), or other such electronic tools.

Electronic Mail ("Email") is defined as an office communications tool whereby electronic messages are prepared, sent and retrieved on personal computers.

Information Systems shall mean and include software, electronic communications, computers, networks, servers and other similar devices that are administered by US Cat and which US Cat is responsible.

Networks shall mean and include video, voice and data networks, routers and storage devices.

On-line services (i.e., Internet, World Wide Web, AOL, etc.) are defined as a communications tool whereby business information, reference material and messages are sent and retrieved electronically on personal computers.

C. Access

Employees assume all responsibility for their access to US Cat's Information Systems. Passwords or access codes must not be shared with others. Although each employee has an individual password to access the Information Systems, it belongs to US Cat. Information regarding usage of US Cat Information Systems is accessible at all times by US Cat management for any business purpose. Unauthorized access to Information Systems is prohibited. No one should use the ID or password of another; nor should anyone provide his or her ID or password to another, except in cases necessary to facilitate computer maintenance and repairs and then only to authorized US Cat technical staff or management. When any user

terminates his or her relationship with US Cat, his or her access to and use of US Cat systems is prohibited.

Waiver of Privacy

US Cat has the right, but not the duty, to monitor any and all aspects of its information systems, including but not limited to, monitoring employee's use of the Internet, reviewing materials downloaded or uploaded by employees, and reviewing email sent and received by employees. Employees waive any right to privacy in anything they create, store, send, or receive on US Cat's Information Systems.

D. Permitted Use

Business Use and Limited Personal Use. US Cat's Information Systems are to be used for company-related business. Limited personal use of the phone system for local calls is permitted so long as it does not interfere with business operations or an employee's performance of duties.

Use of Personal Computers Workstations and Software

Computer workstations (PCs) are the property of US Cat and not the personal property of the individual employee. The following shall apply to PC and software use:

Unauthorized Software – No software other than authorized software is to be loaded onto the PC. US Cat does not condone the illegal duplication of software. The law protects the exclusive rights of the copyright holder and does not give users the right to copy software. Unauthorized duplication of software is a federal crime.

Passwords – No password will be allowed that blocks entry to the PC or to specific applications or files without prior management approval. Employees are also reminded that log-on identification and passwords may not be shared with any third party, nor may they be shared with another employee, unless authorized by a manager.

Security – Employees are reminded that all files on the PC are the property of US Cat. Should an employee resign or be terminated, copying of such files for personal use is prohibited.

E. Use of On-line Services (Internet, World Wide Web, AOL, etc)

On-line Services' sites can and do monitor access and usage and can in some cases, identify individuals accessing their services. Employees should be mindful that accessing a particular bulletin board or Web site leaves company identifiable electronic "tracks", even if the employee merely reviews or downloads the material and does not post any messages. Employees should be aware that US Cat reserves the right to routinely monitor, without prior notice, on-line services access and usage to ensure the system is being used for Company purposes according this Policy. US Cat also reserves the right to ensure its policies prohibiting harassment and inappropriate behavior are being followed. Therefore, employees should only access sites necessary for company business. Inappropriate use may subject an employee to disciplinary action, up to and including termination of employment.

F. Use of Electronic Mail and On-line Services

US Cat's email and Internet systems are intended to be used to promote the effective performance of the business. While it is acceptable to send or receive personal messages of a limited number and frequency, personal use of the email system must be kept within the bounds of efficiency and good judgment. Under no circumstances may personal use interfere with the performance of job duties or violate US Cat policies regarding appropriate workplace behavior.

All email/Internet records are considered company records and should be transmitted only to individuals who have a business need to receive them. This applies to both company proprietary information and confidential material protected by the attorney client privilege. In some cases, sensitive information should not be sent via Email. As company records and email/Internet records are subject to disclosure to law enforcement, government officials and other third parties through subpoena or other legal processes. Consequently, employees should always ensure that the business information contained in email or Internet messages is accurate, appropriate and lawful. Email/Internet messages by employees may not necessarily reflect the views of US Cat, its officers, directors or management. Abuse of the email/Internet systems through unacceptable personal use, or use in violation of law or US Cat policies, may result in disciplinary action, up to and including termination of employment.

US Cat reserves the right to disclose employee email messages or Internet records to law enforcement or government officials or to other third parties, without notification to, or permission from, the employees sending or receiving the messages. As a condition of initial and continued employment, all employees consent to US Cat review and disclosure of email messages and Internet records. In addition, email messages for which the computer system has a record will be stored and retained in accordance with US Cat records management policy.

Employees should be mindful that when they browse the Internet or send email containing the US Cat domain address, they are representing US Cat in a public medium. Under no circumstances should employee use of the Internet compromise the legitimate business interests of the company or give rise to illegality.

Foul, offensive, defamatory, pornographic or other inappropriate communication is strictly prohibited. Further, US Cat prohibits email messages containing offensive material, remarks based on sex, race, ethnicity, national origin, disability, marital status, or age, off-color remarks or jokes, or disparaging statements about any employee or supervisor. Employees may not use the Internet to access, view or download inappropriate materials, including but not limited to harassing or offensive materials, or materials that disparage or demean persons on the above-described bases.

Employees who send out abrasive, harassing or discriminatory email messages or who visit inappropriate sites are subject to disciplinary action, up to and including termination of employment.

G. Misuse of Computers and Electronic Information Systems

Misuse of US Cat electronic information systems is prohibited. Although most users strive for acceptable and responsible use of the system and resources, inexperienced users may unwittingly engage in behaviors that violate the principles and guidelines of responsible and acceptable use. To that end, this section outlines some of the more common forms of violations that occur. These examples should not be interpreted as an exhaustive list of violations. Questions regarding the appropriateness of specific behaviors should be directed to US Cat management. Misuse or violations include but are not limited to the following:

- Using information systems for any illegal or unauthorized purpose.
- Viewing or listening to objectionable, obscene, pornographic, or harassing material.
- Sending chain letters or unauthorized mass mailings or transmitted a crippling number of files across a network.
- Using electronic communications to harass or threaten other employees in such a way as to create an atmosphere which unreasonably interferes with their work environment.
- Similarly, using electronic communications to harass or threaten other information recipients in addition to US Cat users.
- Sending abusive, harassing, obscene, hoax or forged messages, including messages sent under someone else's username.
- Attempting to modify or remove computer equipment, software, or peripherals without proper authorization.
- Violating any software license or copyright, including copying or redistributing copyrighted software, without the written authorization of the software owner.
- Launching a computer worm, computer virus or other rogue program.
- Excessive recreational or non-business use of electronic information resources.
- Gambling or engaging in any activity or action through the use of electronic information systems that violates US Cat policies, regulations, or federal, state or local laws.

These policies apply to US Cat's employees, independent contractors, examiners, and temporary personnel conducting business on behalf of US Cat. US Cat will immediately dismiss an employee for failure to meet any of the specified requirements of the above sections, as determined by US Cat. No warning by US Cat is required and the dismissal is solely determined by US Cat.