

Telecommuting Policy

Objective

Telecommuting allows employees to work at home, on the road or in a satellite location for all or part of their workweek. Strada considers telecommuting to be a viable, flexible work option when both the employee and the job are suited to such an arrangement. Telecommuting may be appropriate for some employees and jobs but not for others. Telecommuting is not an entitlement, it is not a companywide benefit, and it in no way changes the terms and conditions of employment with Strada Education Network.

Telecommuting can be informal, such as working from home for a short-term project or on the road during business travel, or a formal, set schedule of working away from the office.

Eligibility

Before entering into any telecommuting agreement, the employee and manager, with the assistance of the human resource department, will evaluate the suitability of such an arrangement, reviewing the following areas:

- Employee suitability. The employee and manager will assess the needs and work habits of the employee, compared to traits customarily recognized as appropriate for successful telecommuters.
- Job responsibilities. The employee and manager will discuss the job responsibilities and determine if the job is appropriate for a telecommuting arrangement.
- Equipment needs, workspace design considerations and scheduling issues. The employee and manager will review the physical workspace needs and the appropriate location for the telework.
- Tax and other legal implications. The employee must determine any tax or legal implications under IRS, state and local government laws, and/or restrictions of working out of a home-based office. Responsibility for fulfilling all obligations in this area rests solely with the employee.

Evaluation of telecommuter performance will include regular interaction by phone and e-mail between the employee and the manager and will focus on work output and completion of objectives.

Office Space and Equipment

Remote employees will dedicate and preserve a space in the home as their workstation, which is separated from other home activity areas, quiet and free of distractions. Strada will not be responsible for costs associated with initial setup of the employee's home office such as remodeling, furniture, or lighting, nor for repairs or modifications to the home office space. The employee's working conditions in the home office should be safe and efficient. Some considerations include:

- Temperature, noise, and ventilation levels should be appropriate.
- Electrical equipment should be free from hazards (e.g., frayed or exposed wires). Wiring and electrical cords should be secured and out of the way.

- The work area should be large enough to safely accommodate all equipment, wiring and so on without posing a risk or hazard to the employee.
- Hallways and doorways should be free from obstructions.
- The working environment should be free from clutter or materials that could create fire hazards.
- Floor surfaces should be clean and dry. Carpeting should be properly secured.
- There should be ample lighting for the work that the employee will be doing.
- The working area should be equipped with sufficient electrical outlets to accommodate all necessary equipment safely.
- Desks and chairs should be the appropriate size, height, etc. to provide comfort.

Remote employees are responsible for providing their own telephone access and high-speed Internet access at home. Strada will provide the employee with a laptop to be used only for business purposes. Unless special arrangements are made between the employee and Strada, an employee's personal computer, printer, and anything else related to the work station except for Strada network issues, shall not be used for Strada's business and will not be maintained by Strada's IT Department. Strada is not responsible for any system issues related to the employee's personal printer or related hardware or software. Remote employees should notify Strada immediately if any Company-provided equipment malfunctions or otherwise fails to remain in good and safe working order.

In the event that a remote employee has any Strada-provided equipment, documents, files or other property, he or she will return it within five (5) business days of Strada's request and, in all cases, no later than five (5) business days after the employee's termination of employment for whatever reason. The employee is not entitled to use any Strada equipment, information, or property after termination of employment.

Security

Consistent with the organization's expectations of information security for employees working at the office, telecommuting employees will be expected to ensure the protection of proprietary company and customer information accessible from their home office. Steps include the use of locked file cabinets and desks, regular password maintenance, and any other measures appropriate for the job and the environment. Electronic mail, Internet access, and voicemail systems used by the remote employee are intended for business purposes only. Strada reserves the right to monitor or review any information stored or transmitted on these systems.

Safety

Employees are expected to maintain their home workspace in a safe manner, free from safety hazards. Injuries sustained by the employee in a home office location and in conjunction with his or her regular work duties are normally covered by the company's workers' compensation policy. Telecommuting employees are responsible for notifying the employer of such injuries as

soon as practicable. The employee is liable for any injuries sustained by visitors to his or her home worksite.

Telecommuting is not designed to be a replacement for appropriate child care. Although an individual employee's schedule may be modified to accommodate child care needs, the focus of the arrangement must remain on job performance and meeting business demands.

Time Worked

Telecommuting employees who are not exempt from the overtime requirements of the Fair Labor Standards Act will be required to accurately record all hours worked using ADP's time-keeping system. Hours worked in excess of those scheduled per day and per workweek require the advance approval of the telecommuter's supervisor. Failure to comply with this requirement may result in the immediate termination of the telecommuting agreement.

Ad Hoc Arrangements

Temporary telecommuting arrangements may be approved for circumstances such as inclement weather, special projects, business travel, or pandemic situations. These arrangements are approved on an as-needed basis only, with no expectation of ongoing continuance.

Other informal, short-term arrangements may be made for employees on family or medical leave to the extent practical for the employee and the organization and with the consent of the employee's health care provider, if appropriate.

All informal telecommuting arrangements are made on a case-by-case basis, focusing first on the business needs of the organization.