

Welcome to Spire Investment Partners

Dear Employee:

This handbook summarizes Spire's policies, procedures, and benefits for regular, probationary and full-time employees. Regular part-time employees may be entitled to certain benefits depending on the number of hours worked. Policies and benefits described in this handbook may be improved, modified, or terminated at any time at the discretion of the company. The statements in this handbook do not create an express or implied contract between us for employment or for any benefit. All employees of Spire are employees at will. Employees are free to resign at any time and Spire likewise retains the right to terminate an employee's employment at any time.

This handbook supersedes and replaces any prior handbooks, memos, or other policy or benefit information. None of these policies or procedures can be amended or altered in any way by oral statements: Only written amendments by authorized management officials will constitute changes to statements made in this handbook.

We hope you will have an exciting and rewarding career at Spire. This is a fascinating business that attracts interesting people. Our standards are necessarily very high and this is why we chose you to work with us. We hope you will enjoy your work and take full advantage of the opportunities available to you.

Thank you,
Spire Investment Partners

EFF: March 30, 2018

TABLE OF CONTENTS

I. Core Philosophy	3
II. Core Values	3
III. Your Employment	3
Employment Policy	
Selection	
Categories of Employment	
Registration Requirements	
Business Hours	
Employee Hours	
Working From Home	
Introductory Period for New Employees	
Personnel Records	
Updating Your Personnel Records	
IV. Policies and Procedures	5
Communications	
Complaints	
Confidentiality and Information Security	
Disciplinary Action and Involuntary Termination	
Dress Code	
Emergency Notification Protocol	
Inclement Weather	
Internet Use	
Acceptable Uses of the Internet	
Unacceptable Use of the Internet	
Outside Employment	
Personal Use of Firm Services and Equipment	
Policy against Discrimination and Harassment	
Possession of Weapons	
Software	
Sample List of Approved Software	
Sample List of Unauthorized Software	
Voluntary Termination	
V. Pay and Performance	12
Pay Schedule	
Overtime	
Paycheck Information	
Optional: 401(k) Contributions; Medical Coverage; Group Life Insurance	
Bonuses	
VI. Benefits	13
Holiday Pay	
Employee Training	
Time Away from Work	
Absence	
Holidays	
Jury Duty	
Bereavement Leave	
Personal Leave of Absence	
Military Leave	
Personal Time Off (PTO)	
Layoff	
Health Benefits	
401(k) Plan.	
Employee Handbook Acknowledgment Form	17

CORE PHILOSOPHY

Make people's lives better.

CORE VALUES

We always do what is in the best interest of our clients.

We use leading edge capabilities.

YOUR EMPLOYMENT

EMPLOYMENT POLICY

Spire is an equal opportunity employer. This includes, but is not limited to, hiring, placement, promotion, termination, layoff, recall, transfer, leave of absence, compensation, and training. This policy shall be applied without regard to any individual's sex, race, national origin, disability, veteran status, pregnancy, age, or marital status, as defined by federal or Virginia state law.

SELECTION

You have been selected as an employee of Spire on the basis of an available position, your experience, skill, personal interview, and your stated desire to do a good job. When you were hired you were qualified and had the ability to learn and perform the job to which you have been assigned.

CATEGORIES OF EMPLOYMENT

Each employee is hired in one of the following categories:

Full Time – This is a salaried position. Typically works 40 hours per week (but must work 32 hours per week) and is eligible for the full employee benefit program. This employee is considered exempt from overtime pay.

Part Time – This may be a salaried or an hourly position. Works less than 32 hours per week on a regular basis (must work at least 30 hours per week to be eligible for health benefits)

Temporary – Works any number of hours per week for a specific project or to fill in for others on leave. This person is not eligible for any employee benefits.

REGISTRATION REQUIREMENTS

Spire maintains both an SEC Registered Investment Advisor (Spire Wealth Management, LLC) and a FINRA member broker/dealer (Spire Securities, LLC) as separate stand along companies. The registration requirements for each differ and do not apply to each other. Please contact the registration department for further clarification.

Spire Wealth Management: The licensing requirement to become an Investment Advisor Representative (“IAR”) is the attainment of the S65 license, or the S66 if you already hold the S7..

Spire Securities: The licensing requirements to become a Registered Representative (“RR”) are varied and are all detailed on the FINRA website (www.FINRA.org). From there you can determine the registration requirements of a particular activity or job focus.

Spire Sponsorship: Spire may sponsor an individual in order for them to sit for any securities exam. This may require background checks, payment of fees and completion of a U4 form. In order to schedule an examination, Spire must open up a “window” within CRD (Central Registration Depository). Once this window is opened, a charge from CRD is assessed against the firm (Spire). Depending on what has been negotiated, this charge is then passed on to the individual requesting the exam. For employees of Spire, if you have been approved, or required by your supervisor, to sit for an exam, Spire will assume the cost of the exam. If you are not able to pass the exam, you may schedule again. Spire will assume the cost of the second exam window on the condition that the individual receive a passing grade. If not, the individual is responsible for that charge and any further exam charges. An employee is also responsible for the cost of the exam should they “no show” a test or fail to schedule one prior to the testing window closure. Therefore employees should be certain they can be prepared to sit for the exam during the 120 day CRD testing window.

Certain employment positions may require the employee to obtain a particular industry license within a period of time for the employee to continue employment with Spire. These situations and licensing deadlines will be discussed with the employee upon employment with Spire or when their current position requires certain licensing.

Costs for all exams can be found on the Intranet site as well as the FINRA website.

BUSINESS HOURS

Regular business hours for the firm are 8:30am to 5:30pm, Monday through Friday.

EMPLOYEE HOURS

It is expected that an employee work eight hours in a day with a minimum half hour lunch/maximum one hour lunch. An employee can arrange their permanent work schedule with Human Resources and their consultant(s). Final approval of an employee’s permanent work schedule will be from Human Resources. When requesting a permanent schedule, an employee should adhere to the following guidelines: An employee will not arrive at work later than 9am each day;

An employee will not leave work prior to 4pm each day;

An employee must take a minimum of a half hour and a maximum of one hour lunch break between the hours of 11:00 am and 2:00pm;

This is the employee’s ***permanent*** work schedule – any variation from this schedule should only occur with prior notification to Human Resources and the employee’s consultant(s)/supervisor (i.e., doctor appointments).

Some examples of acceptable permanent work schedules are:

Arrive at 7:30am and depart at 4:30pm (one hour lunch);

Arrive at 8:00am and depart at 5:00pm (one hour lunch);

Arrive at 8:30am and depart at 5:00pm (half hour lunch).

WORKING FROM HOME

External IT’s cloud allows access to the Spire network from remote locations. Currently there is no policy for “working from home” for staff. If you are to work from home you must have the prior approval from your supervisor/advisor. Failure to receive appropriate approval will result in the time being charged against PTO.

INTRODUCTORY PERIOD FOR NEW EMPLOYEES

The introductory period for new employees lasts 90 days from the date of hire. During this time you have the opportunity to evaluate Spire as a place of employment and we at Spire have the opportunity to evaluate you as an employee.

The introductory period involves close and frequent employee appraisal. In the event an employee fails to satisfactorily complete the introductory period, he or she would not ordinarily receive advance notice of dismissal.

PERSONNEL RECORDS

Your personnel file contains your employment application, resume, and performance appraisals. All personnel files are kept in the Human Resources area and are accessible under the following guidelines:

- a. You may review the contents of your file during regular business hours and are free to place anything job related in your file. You may not make copies of anything in your personnel file because it contains firm material. You cannot remove your file from the Human Resources area.
- b. Information other than confirmation of employment is not released to outside requests or over the telephone without the employee's consent in the form of a written authorization, unless required by law or regulatory requirement.
- c. Managers have access to personnel files for the purpose of making employment decisions and promotion decisions.

UPDATING YOUR PERSONNEL RECORDS

It is your responsibility to inform your manager of any change in your status so that your records will be up-to-date. It is the employee's responsibility to report, in writing, any change in name, address, and or phone number. If you desire to change your medical coverage, number of dependents or 401(k) contribution amount you must file the necessary documents through Human Resources.

POLICIES AND PROCEDURES

COMMUNICATIONS

Each employee is responsible for the content of all text, audio or images that they place or send over the Internet. Fraudulent, harassing or obscene messages are prohibited. All messages communicated on the Internet should have your name attached. No messages will be transmitted under an assumed name. Users may not attempt to obscure the origin of any message. Information published on the Internet should not violate or infringe upon the rights of others. No abusive, profane or offensive language is transmitted through the system. Employees who wish to express personal opinions on the Internet are encouraged to obtain their own usernames on other Internet systems. Regulatory requirements dictate a level of supervision and review of electronic communication.

All Spire related correspondence conducted via the internet must go through Spire's email system. There are no exceptions to this. Personal email should be transmitted via a personal email account and address.

Instant Messaging is not permitted.

COMPLAINTS

Complaints of acts that are in violation of Spire policy will be accepted orally or in writing. Anonymous complaints will be taken very seriously and investigated. Only those who have an immediate need to know will or may discover the identity of the complainant. Any party contacted in the course of an investigation is entitled to respect and any retaliation toward an individual involved with a complaint is an actionable offense.

CONFIDENTIALITY AND INFORMATION SECURITY

During the course of business we have access to financial affairs of our customers. Such information must be held in the strictest confidence. Therefore, our position is one of extreme trust. You should only become aware of financial information about any customer because of a specific business related need to do so. This information should only be shared with other individuals who have a business need to know and should never be discussed with anyone outside of the firm. As employees of Spire, you have a responsibility to preserve, protect and account for firm information. All information and information systems must be used and managed to ensure protection from a variety of threats, including privacy violations, theft, destruction and improper use.

To ensure that the use of the firm's information systems is consistent with the firm's legitimate business interest, authorized representatives of the firm monitor the use of such equipment and review messages on such systems and maintain records of such in the firm's files. No employee shall have any right to prohibit access by the firm to any message or information placed in or transmitted by the firm's information systems.

DISCIPLINARY ACTION AND INVOLUNTARY TERMINATION

Employees who fail to follow firm policy or whose performance on the job is unsatisfactory are subject to disciplinary action and possible termination of employment.

Employment may be terminated immediately for actions deemed detrimental to Spire. Such actions are, but are not limited to: dishonesty, insubordination, willful destruction of property, provocation of customers or fellow employees, conviction of a crime, drunkenness or use of illegal drugs. Use of profanity, fighting on company premises, sleeping on the job or other disruptive behavior may also be grounds for disciplinary action or termination. ***Additionally, any employee found falsifying, altering, or misrepresenting documents to or on behalf of clients is subject to disciplinary action or termination.***

DRESS CODE/OFFICE DRESS STANDARD

Professionalism is paramount when it comes to our clients and the contact we have with our clients. First impressions have never been more critical. We also know that it takes time to reverse a negative first impression. All employees are expected to uphold the highest standards of professionalism in manner, grooming, and professional business attire. Business dress, good personal hygiene, and well groomed hair are all part of a professional appearance.

Consistent with Spire's goals for the McLean and Reston offices, we have implemented a "Dress Standard" as a courtesy to your colleagues, clients, and prospects who visit our offices. Please follow these guidelines as they relate to how to dress anytime you are in the office. The following are examples and not intended to be all-inclusive. These guidelines should help to set the parameters for our "Dress Standard".

All Teams should consider these standards as minimums. At the team's discretion, they can add to this code for their own team members what they deem acceptable or a desired level of appearance.

Monday – Thursday

WOMEN

- Dress shirts, blouses, sweater/shirt combinations, tailored jackets or sweaters, pants (including gaucha style), skirts, “skorts” and dresses must be “business dress” oriented.
 - Stretch in the clothing material is acceptable, as it is predominate in today's styles and fashion.
 - Professional skirts and “skorts” should be no more than 3 inches above the knee.
 - Hosiery/tights are strongly recommended with skirts and dresses. Please keep personal hygiene in mind when not wearing hosiery/tights.
- Dress shoes with closed toes are suggested for 1 Oct – 30 April
- Open toes are acceptable from 1 May to 30 Sep.
- Appropriate jewelry/accessories which complement outfits are strongly recommended.
- Hair should be well groomed and styled.
- Make-up is optional; however a more successful image is portrayed with even a slight bit of make-up.
- Perfume should be kept to a minimum.

MEN

- Suits, sports jackets, collared shirts, and dress trousers are the standard.
 - A pressed-collar shirt must be worn with any open or V-neck sweater.
- Dress shoes are expected to be polished and in good order and socks (socks are not optional) are required year round.
- Hair and face should be well groomed.
- Cologne and aftershave should be kept to a minimum.

Friday

Fridays can be “business-casual” optional. Please keep in mind that “Business-Casual” does not mean “Week-End Casual.”

Acceptable:

- Pressed khakis, corduroys, and cotton slacks
Pressed collared shirts are still required even though they are more casual than a dress shirt.
- More casual shoe styles are permitted,

Unacceptable:

- Collarless T-shirts are **never** acceptable.
- Jeans, regardless of color
- Any form of athletic shoe or sandals for men.

Summer Dress

Spire will allow business casual dress, other than Friday's, beginning May 1 through September 30.

Acceptable:

- Nicely pressed POLO/Golf shirts (provided that they are "new" in appearance and **not faded** and or **frayed**).
 - The new micro-fiber technology shirts are recommended as they maintain their color and pressed appearance.
- Business casual apparel like dresses, skirts, etc.

Unacceptable:

- Faded or frayed POLO/Gold shirts
- Denim of any kind or color
- Flip-flops or tennis/running shoes

Spire views this casual dress for Fridays as a privilege, not a right. This policy may be discontinued or replaced.

Unacceptable Dress/Fashion

- Clothing with political, profane, or suggestive cartoon drawings
- Torn clothing
- Jean style clothing, i.e. cut, jean pockets, rivets, material
- Denim (any color)
- Extremely baggy shorts or pants
- Clothing that is tight and revealing, regardless of style
- Jogging suits or sweat suits/work-out clothing, any athletic gear
- Revealing attire (shorts, crop tops, tank tops, see through materials)
- Obvious lack of/or unsuitable undergarments
- Loose footwear (flip flops or shoes that make a flopping sound, sandals, etc.)
- Lycra stretch pants, leggings, and yoga style pants.
- Capri pants or peddle-pushers
- Wild Hawaiian or print clothing
- Visible piercings other than the ears.

If you are unsure of whether or not what you plan to wear to work is appropriate – don't wear it.

An individual not adhering to these guidelines will be asked to go home and change. Repeated violations may be grounds for termination.

Any questions on this policy should be directed to Human Resources.

Emergency Notification Protocol

If an emergency occurs (examples would include weather event, building event, suite event) where either the Reston or McLean offices are affected, Spire will make the announcement of the emergency and next steps through the following procedure:

- 1) The Director of Finance, COO, CCO, and Dir. Of Ops. will evaluate the emergency and decide on the necessary action and communication.
- 2) The Executive staff team will then communicate by 6:30 a.m. eastern standard time to the rest of Spire through the following procedure:

- a) COO will text the Mclean group

- I) McLean Group text will consist of Office Manager, Spire Corporate, and Lead advisor of McLean Office

- i) Lead advisors will then contact their employees as they see fit

- b) CCO will send out Spire Nationwide Email, notifying every one of the decision to the emergency

- c) Dir. Of Ops will text the Reston group

- I) Reston group will consist of operations, compliance, finance, and the lead advisor of Reston Office

- i) Lead advisors will then contact their employees as they see fit

- d) Director of Finance will serve as backup to the other members of the executive staff if they are unavailable/unable to complete their communication to the assigned groups.

INCLEMENT WEATHER

Policy: Spire Investment Partners will make every effort to maintain normal work hours even during inclement weather.

Provisions: Prior to normal starting time when it is announced that federal government offices will be closed due to inclement weather, the Spire McLean and Spire Reston offices will be closed. On those occasions, all full-time employees will be required to report from and work from home. Employees unable to work from home will be required to take PTO. Part-time employees will also be expected to work their normal shift from their homes, and will only be paid if normally scheduled to work that day and only for those hours which the employee would normally have worked. When the federal government announces that a liberal leave policy is in effect, the Spire McLean and Spire Reston office will be open and all employees will be expected to make reasonable efforts to get to work.

Employees unable to arrive for work on any particular day will be charged eight hours of Personal Time Off (PTO). All employees who are unable to report to work should contact their supervisor and report their absence 60 minutes prior to the start of their work day, or it may be considered an unexcused absence.

If inclement weather occurs on a federal holiday not generally observed by Spire, and Spire employees are therefore at work, Spire will make its own decision concerning early closing on that day. Again, employees are expected to report from and work from home.

On days when weather conditions worsen as the day progresses, Spire may decide to close early. In such cases, a decision and an announcement will be made at Spire as to where employees are expected to work from.

Emergency Closings (Business Continuity Plans)

Except for regularly scheduled holidays, Spire will be open for business on Mondays through Fridays, 8:30 AM to 5:30 PM. The company recognizes that circumstances beyond its control, such as inclement weather, national crisis, or other emergency, do occur. On such occasions, the company may close for all or part of a regularly scheduled workday.

With External IT's cloud, home office staff/employees should have access to the company network and therefore company email from a remote location. Should it become necessary for the office to open late or close, due to an emergency (weather or otherwise), a notice will be posted to the announcement section of the home page. A backup, broadcast notice will also be sent to the designated contact (i.e. email address or phone). All staff will report, via email, or phone, to their supervisor that they have read the notice and will be available via email or phone for that time period. Again it is expected that all staff/employees will be able to process and conduct business at their remote location.

The CCO or Director of Operations will notify our clearing and broker dealer partners of the closing.

Should events occur during the workday – notice of closing or other instructions will be communicated directly by phone and by email by the Operations Manager or a designee. If an emergency evacuation is called for, all staff/employees will be asked to leave and proceed to a designated area. At that point a "head count" can be taken. Should the evacuation last for more than 4 hours (or the remainder of the day), all staff/employees will be asked to return home and check in via email, or phone, for the head count.

Spire main phone line – A message will be recorded on the main 5800 line

Client Communication in the Event of an Emergency

Clients may become confused as to the safety of their securities and investments in times of an emergency. The first thing to make them aware of is that Spire does not, in accordance with SEC Regulation, hold or custody any client securities or monies. Should a client deliver any form of security to Spire it is forwarded via overnight mail to a Qualified Custodian. All forms of investments (i.e. funds, securities etc.) are held at a Qualified Custodian. Qualified Custodians are SEC and NASD or NYSE regulated entities. The Disaster Recovery plan for each of the primary platforms of the Qualified Custodians used by Spire is available on the Intranet Site.

INTERNET USE

Access to the Internet has been provided to staff members for the benefit of the organization and its customers. It allows employees to connect to information resources around the world. Every staff member has a responsibility to maintain and enhance the company's public image, and to use the Internet in a productive manner. To ensure that all employees are responsible, productive Internet users and are protecting the company's public image, the following guidelines have been established for using the Internet.

Acceptable Uses of the Internet

Employees accessing the Internet are representing the company. All communications should be for professional reasons. Employees are responsible for seeing that the Internet is used in an effective, ethical and lawful manner. Internet Relay Chat channels may not be used to conduct official company business. Databases may be accessed for information as needed. E-mail may be used for business contacts.

Unacceptable Use of the Internet

The Internet should not be used for personal gain or advancement of individual views. Solicitation of non-company business, or any use of the Internet for personal gain is strictly prohibited. Use of the Internet must not disrupt the operation of the company network or the networks of other users. It must not interfere with your productivity.

OUTSIDE EMPLOYMENT

We expect you to devote your best efforts to the firm's work; therefore, we discourage the undertaking of outside employment. Exceptions to this requirement need the advance approval of your supervisor and Human Resources. Requests for exception to this rule must be submitted in writing to your supervisor or Human Resources prior to accepting outside employment. To avoid conflicts of interest, the written request must include the name of the company you intend to work for and the type of work you will be performing. Outside employment that constitutes a conflict of interest is prohibited.

PERSONAL USE OF FIRM SERVICES AND EQUIPMENT

You are asked to keep personal calls to a minimum.

Personal mail should not be sent to the office. Communication equipment should be used only for business purposes. Therefore, you should not send faxes, overnight packages, e-mails or wires except for business reasons. Additionally, the firm's stationary and supplies should only be used for business related correspondence.

POLICY AGAINST DISCRIMINATION AND HARASSMENT

Spire is committed to providing a work environment free of illegal discrimination or harassment on the basis of race, color, religion, sex, age, national origin, disability, or any other factor prohibited by applicable law. Employees who engage in unlawful discrimination or harassment will be subject to disciplinary action up to and including termination.

Sexual harassment, according to the federal Equal Employment Opportunity Commission (EEOC), consists of unwelcome sexual advances, requests for sexual favors, or other verbal or physical acts of sexual or sex-based nature where:

- 1) submission to such conduct is made either explicitly or implicitly a term or a condition of an individual's employment;
- 2) an employment decision is based on an individual's acceptance or rejection of such conduct;
- 3) such conduct interferes with an individual's work performance or creates an intimidating, hostile or offensive working environment.

Examples of unlawful harassment include, but are not limited to, verbal, visual conduct, inappropriate comments, and physical touches of a sexual nature, which create a hostile or offensive work environment.

If you feel that you are being harassed or discriminated against, you should immediately report the matter to your supervisor. If this is not possible or appropriate, you should contact the Director of Human Resources, a principal of the firm, or another supervisor as soon as possible

after the incident. All complaints of harassment or discrimination will be investigated as thoroughly as possible, and will be regarded as a private and confidential matter.

POSSESSION OF WEAPONS

Carrying, possessing, or maintaining any firearms, ammunition or other weapons on Spire' property while working is strictly prohibited. Failure to comply with this policy is grounds for immediate termination of employment.

SOFTWARE

To prevent computer viruses from being transmitted through the system and to maintain information and network security there will be no unauthorized downloading of any software. All software downloads will be processed through the External IT help desk. If you have any question(s) about the legitimacy of software installed on your computer, please contact your supervisor

VOLUNTARY TERMINATION

If you decide to leave the firm, you should give the Director of Human Resources as much advance notice as possible. Normally, we request a minimum of two weeks, however four weeks advance notice of resignation is requested from managerial and professional personnel. Employees cannot use Personal Time Off after the Director of Human Resources has received notice of resignation.

Your final paycheck will be available on the next scheduled pay date following your last day of employment. Before you leave you are required to return any keys or building passes that you have in your possession.

After you leave the firm will verify dates of your employment and the last position you held with us. The firm will also file a U-5 form for any registered personnel.

PAY AND PERFORMANCE

PAY SCHEDULE

Employees are paid on the 15th and last business day of each month. If the scheduled pay date falls on a weekend or holiday, employees will receive their paycheck on the preceding business day. Any questions regarding your paycheck should be directed to Human Resources.

OVERTIME

Occasionally, it may be necessary to work overtime. Whenever possible, you will be given advance notice.

PAYCHECK INFORMATION

Certain paycheck deductions are required by law or on your request. Your pay stub will indicate the various deductions listed below:

Required: Federal Income Tax; Federal Medicare Tax, Federal Social Security Tax; State Income Tax and Local Income Tax

Optional: 401(k) Contributions; Medical Coverage; Group Life Insurance

BONUSES

Bonuses are at the discretion of the firm and/or the consultant you work for. Bonuses are generally not paid for the activity performed during your first six months with the firm.

BENEFITS

HOLIDAY PAY

Salaried employees must have worked the last full scheduled work day prior to and the next full day after such holiday to qualify for holiday pay unless previous arrangements have been made with Human Resources and direct supervisor.

EMPLOYEE TRAINING

Employees receive training on their specific job and also on many related jobs. The more jobs an employee knows, the more valuable the employee becomes to the firm.

TIME AWAY FROM WORK

Absence

The successful operation of our business depends on regular and dependable attendance as well as continued application to your work. Therefore, regular attendance and punctuality are expected of every employee.

If you are unable to report to work because of illness or other emergency, you must notify your Supervisor no later than the first hour of your scheduled work day. You should also indicate the probable duration of your absence so the provisions can be made to staff your job while you are away.

Employees who are absent two consecutive workdays without proper notification to their manager will be subject to termination. Absenteeism without notification, unsubstantiated illness and tardiness are considered reasons for termination.

For any medical related absence the firm, at its discretion, may require you to have a Physicians Statement completed and returned to Human Resources.

Absences count against accrued Personal Time Off (PTO). Absences will be without pay for employees still in the 90-day Introductory Period.

Short-Term Absence

A short-term absence is defined as four or less consecutive business days.

Extended Medical Absence

An extended medical absence for full-time employees is defined as five or more consecutive business days due to a physical or mental condition that substantially prevents the performance of an employee's work duties.

The firm reserves the right to request a Physicians Statement at any time for verification of an extended medical absence.

Salary and benefits continuance is evaluated on a case-by-case basis for an extended medical absence. All Personal Time Off must be exhausted prior to such continuance evaluation.

Holidays

Regular full-time employees are eligible for holiday pay immediately upon hire. Employees on a leave of absence are not eligible for holiday pay.

Spire's holiday schedule conforms with that of the posted Holiday Schedule of the New York Stock Exchange (www.nyse.com): New Year's Day, Martin Luther King Day, President's Day, Good Friday, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day. On occasion, the New York Stock Exchange will select dates near holidays on which the market will close at 1pm (the day after Thanksgiving, Christmas Eve, etc.). In the event that such dates are posted on the New York Stock Exchange Holiday Schedule, the firm will close at 1:30pm.

Jury Duty

Regular full-time employees will be granted time off for jury duty and paid their full salary for up to two weeks of service. If the employee is discharged from court for the day in time to come to work, they are expected to do so. The employee is required to submit a copy of the Jury Duty Notice to receive pay for the days served.

Bereavement Leave

In the unfortunate event of a death in the immediate family, full-time employees may be paid for up to three days absence from work. Immediate family includes spouse, parent, sibling and child. In the event of a death of an extended family member such as aunts and uncles, grandparents, and grandchildren, the employee will be paid for one day's absence. Emergency Leave other than described above will be handled as short-term or extended medical absence.

Personal Leave of Absence

A request for a personal or family leave of absence must be submitted in writing to the Director of Human Resources for consideration. All requests should be submitted at least thirty days in advance of the effective date of the leave except in the case of an emergency.

Military Leave

Employees who are members of the uniformed services may request military leave without prejudice to their employment if they are ordered to active duty.

For members of the uniformed services who are ordered to participate in their annual two-week active duty, the firm will pay the employee the difference between their Spire base salary and their service compensation.

Personal Time Off (PTO)

The company believes that its employees are the key to what makes a great company. While work makes up a large portion of an employee's life, we believe that a balance between work and play is essential in maintaining quality performance and a fun atmosphere in which we work. To help foster this idea, the company designed a vacation and sick policy that incorporates both policies into one, a Personal Time Off (PTO) Plan. This plan is applicable to all full-time employees. New employees are required to complete the 90-day introductory period before taking Personal Time Off.

Employees earn PTO based on time actually worked. No employee will be allowed to enter into negative PTO status. Once an employee uses all available accrued PTO, any additional time away from work will be without pay. Exceptions to this rule must be authorized by your Supervisor.

Due to the administrative difficulty in tracking a growing number of people, we do not allow PTO hours to be "made up" or "earned back" by working additional hours. Employees on a leave of absence for one month or more may have their Personal Time Off adjusted accordingly.

A maximum of 40 hours of accrued and unused PTO time may be carried over from one calendar year to the next.

Upon termination of employment, an employee is entitled to payment for accrued PTO only after completing one full year as a full time employee. If you are showing a negative balance upon termination, your final paycheck will be deducted to reflect the negative hours.

The Personal Time Off year begins on January 1st and runs through December 31st. Employees who begin employment other than January 1st will have their accrual rate prorated for that pay period in which they begin employment. The accrual rate will resume at the standard rate for the next pay period.

All full-time employees will accrue PTO hours according to the following table:

Administration and Operations Staff

<u>Length of Service</u>	<u>Days</u>
1 – 5 Years	14
6 + Years	19

Principals, Vice Presidents

<u>Length of Service</u>	<u>Days</u>
1 – 5 Years	19

Requesting Personal Time Off (PTO)

New employees are required to complete the 90-day introductory period before taking Personal Time Off. Your Supervisor has final authority to approve or deny requests for time off. The more advance notice you provide the better your chances of obtaining the dates you request. Requests for PTO for two (2) days or more should be submitted at least two (2) weeks in advance.

Layoff

If the situation arises where it becomes necessary to reduce the number of employees due to a reduction in business or because of technological displacement, employees may be laid off based upon factors such as length of service and job skills.

HEALTH BENEFIT

Spire is enrolled in the United Healthcare, Avesis Eyecare and Delta Dental. If you choose to participate in this health plan, enrollment forms and information will be provided to you upon eligibility. New employees are eligible for benefits on the first day of the month following employment. A new employee has an open enrollment period of 30 days after date of hire to apply for benefits, otherwise the employee will need to wait to enroll during the annual corporate open enrollment period. The firm covers 75% of the employees' monthly premium. The employee is responsible for the remaining 25% of the monthly premium and for 100% of their beneficiaries' premiums. Note, the payroll deductions for health, dental and vision all qualify for pre-tax deduction status.

401(K) PLAN

TransAmerica Retirement Services is our retirement service provider. Participation is available to all full time employees after 90 days. Package is available from the Human Resources manager. Currently there is no match.

EMPLOYEE HANDBOOK ACKNOWLEDGMENT FORM

I acknowledge that I have received, read, and understand the policies outlined in the Spire Handbook dated _____. I agree to conform to the rules and regulations of Spire as described in the handbook that is intended as a guide to human resource policies and procedures. I understand that the company has the right to change the handbook without notice. It is understood that future changes in policies and procedures will supersede or eliminate those found in this book, and that employees will be notified of such changes through normal communication channels.

I also understand and agree that the information contained in these materials does not constitute an employment contract between Spire and me, and that either Spire or I may terminate our employment relationship at any time, with or without cause. I understand that no manager or representative of Spire, other than the Chief Executive Officer of the company, has any authority to enter into any agreement for employment for any specified period of time, or to make any agreement contrary to the foregoing.

Employee Signature

Date

Employee Name (please print)

Note: Please give this completed form to Human Resources for filing in your personnel file.