

**Sportservice
“The Company”**

Work Rules & Regulations

Revised January 2012

ABOUT THIS HANDBOOK

The Work Rules & Regulations is intended for all union and part-time seasonal associates of the Company, and has been prepared and presented for informational purposes and guidance. The Company cannot anticipate every situation or cover every aspect of employment. Therefore, in order to retain the necessary flexibility in the administration of policies and procedures, the Company reserves the rights to modify, rescind, delete or add provisions of this handbook without notice, at any time. This handbook supersedes any and all previous handbooks provided to you relative to your employment by The Company. This handbook is subject to the laws of the state in which you work. You should become familiar with your unit's specific House Rules, with which you must also comply. Where any applicable House Rule conflicts with this handbook, the highest standard, or most conservative policy shall prevail.

Because the handbook is meant to be a set of guidelines, it is not a contract expressed or implied between any Associate and the Company. Unless prohibited by state law, the employment relationship is of an "at-will" nature and either the Associate or the Company can terminate the employment relationship at any time, for any reason, with or without notice. No representative of the Company, except the Chief Operating Officer of the Company, has the authority to enter into an agreement with an Associate that is contrary to the foregoing.

At all times you are employed by the entity whose name appears on your paycheck and/or your business card and no language herein shall alter that relationship.

POLICY MANUAL

The Corporate Policy Manual (referenced as the "online Company Policies") has been issued to establish policies and expectations of the Company, and is available online on the Company portal to all Exempt Associates. This handbook makes reference to these Company Policies but does not contain the complete Policy, which supersedes this handbook. The online Company Policies, as amended from time to time, are the ultimate authority on Company Policies. Because we cannot provide a copy to all Associates, it is your responsibility to be aware of the Manual's contents or ask your manager for clarification on these policies.

PREROGATIVE OF MANAGEMENT

The management of the business of the Company and the direction of the Associates are the exclusive rights of The Company. These rights include, but are not limited to: the right to hire, promote, demote, schedule Associates; assign and reassign duties; transfer or relieve Associates from duty, discipline and discharge Associates; and establish and enforce guidelines and procedures. The Company will be the sole judge of all methods, processes, means and materials used in the operation of its business.

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VISION STATEMENT

To become the preferred provider of products and services that foresee and satisfy the needs of customers, balancing the highest level of satisfaction consistent with maximizing returns to stakeholders.

MISSION STATEMENT

Creating special experiences one guest at a time. ®

DEFINITION OF TERMS

Full-time - An Associate who works in a year-round position with the expectation of working 40 hours per week and 52 weeks per year (less paid vacations), however, hours per week may vary by subsidiary.

Part-time – An Associate who is not expected to work at least 40 hours per week and/or is expected to work less than 52 weeks a year (less paid vacations, if applicable); however, hours per week may vary by subsidiary.

Non-Exempt – An Associate who is covered by the minimum wage and/or overtime provisions of the federal Fair Labor Standards Act (FLSA) and similar provisions of applicable state law. A Non-Exempt Associate must record all time worked on a time record.

Exempt – An Associate who is not covered by the minimum wage or overtime provisions of the federal Fair Labor Standards Act (FLSA) or similar provisions of applicable state law. An Exempt Associate is paid an agreed upon amount for the whole job, regardless of the amount of time required to complete the work.

Seasonal – An Associate who is hired to work during the operating season for a specific period of time that is less than 52 weeks in one year. At the conclusion of the season, their work experience will end upon completion of their job responsibilities. Seasonal Associates are not eligible for Company benefits.

Temporary – An Associate who is hired to perform a specific task and who is hired for a specific period of time not to exceed a six-month period. A temporary Associate generally is not hired during an operating season and does not return to work the next operating season. A temporary Associate is not eligible for Company benefits.

Intern – An Associate who is hired for a specific period of time through the Company internship program to perform a project related to his/her course of study usually not to exceed a ninety (90) day period. An intern is not eligible for Company benefits.

Supervisor – An Associate, whether hourly or salaried, who is responsible for providing direction or assigning work to other Associates.

Concurrent Associates – A Non-Exempt Associate whose employee type is hourly, and who is employed at two or more field locations.

Shared use of Non-Exempt Associates – Non-Exempt Associates may work in another unit in a Non-Exempt position. If an Associate is terminated at one unit location, his/her employment at the other unit location will be called into question and may lead to termination from the Company.

Hours worked by Non-Exempt Associates working at more than one unit must be added together to arrive at the total hours worked for that week. The total cumulative hours worked are subject to overtime regulations.

Shared use of Exempt Associates-- Exempt Associates cannot work in positions that have been classified as Non-Exempt and receive supplemental wages. They may however, work in an Exempt position at another unit.

Expatriate - An employee who is paid through the Home Office in U.S. dollars, but works in another country. The maximum time of employment is restricted to a period of up to 5 years. An expatriate may be eligible for Company benefits.

COMPANY CULTURE – WHAT WE VALUE

GREENPATH®

GreenPath is an environmental management system (“EMS”) created for the Company. An environmental management system is that part of the company’s overall management system that includes organizational structure, planning activities, responsibilities, practices, procedures, processes, and resources for developing, implementing, achieving, reviewing, and maintaining the environmental policy.

GreenPath was developed to help the Company manage its environmental responsibilities. Associates need to be environmentally aware, at the least, and environmentally responsible as well. The company is enthusiastically and aggressively seeking ways to improve environmental performance in all our tasks, and Associate involvement is key.

The key elements of GreenPath are listed in the Company’s Environmental Policy Statement, which is posted in public areas at participating locations. They are:

- Incorporate environmental consideration into business decisions, including planning and design activities.
- Set measurable objectives to improve environmental performance.
- Reduce where practicable the generation, discharge and emission of wastes to all environment air, land, surface water, and ground water.
- Anticipate emerging environmental issues and develop programs to respond to future requirements.
- Allocate and maintain resources for the effective implementation of environmental management and compliance programs.
- Encourage communication among Associates, visitors, clients, neighbors and surrounding communities, suppliers, guests, and the general public regarding the Company home office environmental issues.

We want you to enthusiastically support GreenPath and the Company’s environmental vision.

You are encouraged to bring environmental issues to management or a Company ambassador so we can work toward continual environmental improvement. You are also encouraged to seek ways to perform your job in order to reduce any potential environmental impact associated with it.

GUESTPATH - *Creating special experiences one guest at a time.* ®

UNIVERSAL SERVICE STANDARDS

Our Universal standards are the foundation on which we build and deliver our Company Service Philosophy. These minimum standards guide our actions during every guest and Associate interaction and help us achieve our Guiding Principles. These standards apply across all of the Company and describe our service expectations. Your location's business needs may require an even higher standard than those listed here. Remember, our guest experience begins with you!

1. Professional Appearance and Grooming

We start by looking the best we can. We present a professional appearance because a poor appearance immediately detracts from all aspects of our service.

We are professionally attired (for uniformed positions, only company-issued garments are worn on the job and uniforms are complete.)

- Our clothing (uniforms and business attire) is clean, well maintained, pressed and fits properly.
- Our shoes are clean, polished and in good repair.
- We wear the correct name badge (meeting the Company specifications) to enable a personal connect with our guests.
- Our jewelry (if worn) is conservative style and number.
- We wear no more than two earrings per ear.
- We display no visible body piercing (other than earrings).
- Our hair is neatly groomed and conservatively styled. Hair color/highlights are natural in color.
- Beards or mustaches are neat and trimmed no more than one-inch long. We are clean-shaven, if a beard is not worn.
- We report to work bathed or showered and use an antiperspirant/deodorant. Our fingernails are well groomed. Our perfume and cologne, if worn, is not overbearing.

2. Attentive Posture

Welcoming positive energy is essential when creating experiences of a lifetime.

- Our posture is friendly, enthusiastic, patient and attentive at all times.
- Our facial expressions are alert and confident.
- Our posture is upright, indicating an eagerness to assist our guests.
- We acknowledge our guests within three feet as they approach us or we approach them.
- We smile and maintain friendly eye contact while we are conversing with guests and fellow Associates. We respond to each guest as an individual.
- We are prepared to assist guests by carrying the appropriate items (for their job positions) such as pens, wine openers, etc.

3. Gracious and Friendly Service

Gracious and friendly service depends on courteous and professional language.

- We use the four steps of Service From All Directions and our Guiding Principles when interacting with guests. We demonstrate cordial, sincere and welcoming behaviors in interactions with guests and co-workers.
- We use pleasant, refined, well-modulated voice tones when speaking with guests and Associates. We use polite professional language and phrases such as “I would be happy to,” “It is my pleasure,” etc., rather than “Sure,” or “OK.” When a guest says “Thank you,” we respond with a sincere, “You are welcome.”
- We do not use profanity, slang or industry jargon while we are talking with guests.

4. Guest Name

- We “Notice” whenever possible by determining and using our guests’ names. This helps us recognize and respond to our guests as individuals.
- We greet our guests by name whenever possible. If we know the guest’s name, we use the name at least three times (at the beginning, middle and end of the interaction). If we are unsure of a name pronunciation, we ask the guest.
- We greet guests by name as a signal of recognition in a clear and personable manner. When greeting a guest by name, we use a professional personable style, such as: “How are you today? It is a pleasure to see you again, Mr. and Mrs. Smith. Welcome back to (facility name).”

5. Greeting Guests

Extending a gracious greeting is one of the many ways that we surprise our guests with special touches.

- We actively greet guests with a smile and eye contact that communicates warmth and genuine hospitality. When meeting someone for the first time, we provide a courteous and professional greeting such as: “Hello, how may I help you?” “How do you do, Mr. and Mrs. Smith?” “It is a pleasure to meet you.” “Welcome.” or “Welcome back!”
- We acknowledge our guests within five feet as they approach us or we approach them.
- When with another guest or on the phone, we immediately acknowledge waiting guests with eye contact, a smile and a verbal acknowledgement, if possible.

6. Thanking the Guest

Thanking a guest is the final way that we communicate our appreciation and pleasure for the opportunity to provide service.

- We always thank departing guests. We provide a warm and sincere farewell wish, communicating our appreciation for the opportunity to be of service.

7. Teamwork

We understand that experiences are built around the efforts of many people. Some of us are behind the scenes and others are in the guest contact areas. Our efforts all combine to create the experiences of a lifetime. It is a team effort.

- We display a positive, cooperative attitude at all times. We work together in a cooperative manner and demonstrate respect for each other. We are familiar with each other's roles and can work as a team to provide exceptional service.
- Our personal problems never interfere with providing exceptional guest service.
- Personal and business information or conversations not related to the guest interaction is kept "behind the scenes."

8. Pride in Facility Appearance and Maintenance

The cleanliness and condition of our facilities truly affects the guest's overall perception of the quality of our services, products and Associates. A facility's poor appearance immediately detracts from all aspects of our service.

- We demonstrate a pride in the appearance and maintenance of our facility by picking up paper and debris. We immediately notify the appropriate departments to address spills, cleanliness and maintenance issues.
- We understand that a clean and well-maintained facility is everyone's concern and responsibility. We work as a team to ensure our facility is the best it can be.

9. Product Knowledge & Associate Skills

Knowledgeable well-trained Associates are confident and prepared to understand and foresee our guests' needs. Whether in a lodging, stadium, airport or other facility, Associates are able to provide quick and accurate responses when guests seek information about the facility or the local area.

- We communicate clear and accurate information to guests and fellow Associates. We are able to describe our local facilities, products and service offerings, including hours of operation. We inform guests of facility activities, restaurant reservation procedures and dress codes. We notify guests in advance of unavailable services, products, closed facilities and delays and assist the guests to arrange alternative services.
- We are able to direct guests correctly to related areas of the facility. We provide escorts, as well as directions, to guests whenever possible. If we are unable to leave work area, we point with an open hand in the proper direction or ask a fellow Associate to escort the guest.
- We are trained in technology systems and equipment used in the performance of our job responsibilities.
- In all of our facilities, we provide guests with information about the location of restrooms, seats, elevators, ATM's or the location of any other pertinent products and services. In our lodging facilities, we provide guests with information on local services and attractions including medical facilities, shopping, banking, places of worship, entertainment, etc., and driving directions/transportation options. We are knowledgeable regarding the use of facility resource materials to provide information to guests.

- A facility map is available at our points of sale. In lodging facilities, a property map showing locations of guest rooms, meeting rooms, food and beverage outlets, fitness areas, elevators, stairs, vending, etc., is available at the front desk.

10. Telephone Courtesy Standards

Whether in a lodging, stadium, airport or other facility, we offer gracious and friendly service over the telephone.

- Telephone calls are answered within three rings. Guests are placed on hold no longer than 30 seconds without the Associate updating him or her regarding the status of the call.
- We offer a pleasant greeting, our name, the establishment name and offer assistance. For example, “Good morning/afternoon/evening, thank you for calling (the establishment name). This is (Associate name) speaking, how may I assist you?”
- We properly close the conversation. For example, “Thank you, Mr. Smith, for calling the (establishment). We look forward to seeing you this weekend.”
- We project a positive, professional and hospitable service when answering telephone calls. We project a smile in our voice when using the telephone. We use proper etiquette and vocabulary at all times over the telephone. We are polite and natural, not casual.
- We practice active listening skills, responding by acknowledging, “Yes,” “I see,” and “I understand,” rather than “Uh-huh,” and “Yeah.”
- In all facilities, we use the guest or caller’s surname at least once during internal calls where the guest’s surname is displayed on the console or when the caller identifies him/herself.

SECTION I: COMPANY POLICIES

ANTI-HARASSMENT

The Company is committed to providing a productive work climate, free of harassment. Accordingly, harassment of any kind by management or coworkers at any level will not be tolerated. In addition, the Company will protect Associates, to the extent possible, from reported harassment in the workplace by non-Associates.

Prohibited Forms of Harassment

Harassment is conduct which makes fun of, belittles or shows hostility or dislike to an individual because of his or her race, color, religion, sex, sexual orientation, national origin, age, disability (or perceived disability), marital status, sexual orientation or veteran status, or any other basis protected by applicable law, or because of this association with a person in such a protected group and which:

- has the purpose or effect of creating an intimidating, hostile or offensive work environment;
- has the purpose or effect of unreasonably interfering with another individual's work performance;
- otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes, but is not limited to, the following:

- Epithets
- Slurs
- Negative Stereotyping
- Degrading comments
- Threatening, intimidating or hostile acts (even if claimed to be "jokes" or "pranks" and even if not directed at a particular individual) which relate to race, color, religion, sex, national origin (including, but not limited to, an individual's difficulty in speaking the English language), age, disability (or perceived disability), marital status, sexual orientation or veteran status; and
- Written or graphic material (including, but not limited to, computer images) which makes fun of, belittles or shows hostility or dislike toward an individual or group because of race, color, religion, sex, national origin, age, disability (or perceived disability), marital status, sexual orientation, or veteran status which is displayed, shown or circulated in the workplace.

Any harassment of Company Associates is a violation of this Policy and is absolutely prohibited and will not be tolerated.

Sexual Harassment

Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when:

- It is directly or indirectly implied that submission to such conduct is a requirement or condition of an individual's employment; or
- It is directly or indirectly implied that submission or rejection of such conduct will have a bearing on employment decisions involving the individual; or

- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

For example, the following kinds of behavior, or others with a similar harassing effect, are absolutely prohibited:

- Abusing an Associate through insulting or degrading sexual remarks, jokes, innuendoes, or other sexually oriented conduct, whether or not directed at a particular individual (including, among other things, graphic or descriptive comments relating to an individual's body or physical appearance, sexually oriented teasing or pranks, improper suggestion, objects, pictures or computer images, or unwanted physical contact); or
- Threats, demands or suggestions that an Associate's work status depends in any way upon tolerating or accepting sexual advances or sexually oriented conduct.

Retaliation

The Company will not retaliate, intimidate, coerce, threaten, discriminate, or otherwise take any adverse employment action against an Associate who files a complaint, reports a violation, or participates in an investigation. Likewise, the Company prohibits any Associate from retaliating against a coworker or non-employee for filing a complaint, reporting a violation, or participating in an investigation.

Complaint Procedure

The Company does not and will not tolerate harassment. To make sure that our Associates are not subject to harassment, any Associate who is aware of any sort of harassment prohibited by this policy, whether because they were subjected to the harassment or because they witnessed it, is required to report it. If you are not sure whether it is harassment, report it. Reporting harassment is not voluntary. The Company requires all harassment to be reported. In addition, managers are required to report complaints of harassment to the Corporate Human Resources Department immediately. Failure to report harassment can result in disciplinary action, up to and including termination in the appropriate situation. If you report harassment, the Company will protect you from retaliation and your report will in no way affect your job or your career. The Company makes this commitment because we must know about offending conduct before we can take responsive action.

Complaints or reporting may be made directly to the Corporate Vice President of Human Resources by calling (800) 828-7240. It is not necessary to talk with anyone within your department or at the unit before calling. If you choose, you may discuss the matter with your supervisor, General Manager, or Human Resources at your unit.

All complaints will be investigated promptly and discretely. Complaints will be kept confidential to the greatest extent possible, given the need to conduct an adequate investigation. Any Associate who is found to have violated this policy, will be subject to appropriate disciplinary action, up to and including termination.

EQUAL EMPLOYMENT OPPORTUNITY

The Company is committed to the principles of fair employment practices and equal employment in the work place.

The Company provides equal opportunity in employment practices for all persons and prohibits discrimination in employment practices because of race, color, religion, age, sex, sexual orientation, disability, national origin, or any other category protected by law.

The Company's policy not to discriminate on the basis of a person's race, color, religion, age, sex, sexual orientation, disability (or perceived disability), national origin, marital or veteran status, or any other category protected by law, extends, but is not limited, to the following: recruiting, hiring, training, on the job treatment, performance evaluation, promotion, transfer, demotion, termination, pay, and terms and conditions (or privileges) of employment.

No Associate will aid, abet, compel, coerce or conspire to discharge or cause another Associate to resign because of the Associate's race, color, religion, age, sex, disability, national origin, ancestry or any other category protected by law.

At a minimum, the Company will take such affirmative action as is appropriate to ensure that all Associates will be employed in positions consistent with his/her skills, education, experience and interest. Every Associate of the Company with supervisory responsibilities will be held responsible to ensure that all areas under his or her control are administered without regard to race, color, religion, creed, age, sex, sexual orientation, disability, national origin, ancestry or any other category protected by law.

Any Associate who feels that he/she has been or is being subjected to discrimination and any Associate having knowledge of conduct that could be considered discriminatory, should report such conduct to his/her manager, or the Corporate Human Resources Department. Managers must notify the Corporate Human Resources Department of any reports they receive. All reports of discrimination will be investigated promptly by the Corporate Human Resources Department in conjunction with the Corporate Law Department. Where necessary, appropriate action will be taken to prevent and remedy any such conduct.

Willful violation of this policy on equal employment opportunity by an Associate of the Company will be cause for disciplinary action, up to and including termination.

The required Equal Employment Opportunity Federal Poster is posted at the unit.

REASONABLE ACCOMMODATIONS

The Company will attempt to make disability-related workplace accommodation consistent with federal and state legal requirements. Any qualified applicant or Associate with a disability who requires an accommodation to perform the essential functions of his or her job should contact either a member of the management staff or the Human Resources Department to request an accommodation. After a request for an accommodation is made, the Company will discuss the requested accommodation and other possible accommodations with the individual in an effort to

find a reasonable accommodation that will allow him or her to continue with the hiring process or, as the case may be, perform the essential functions of the job without creating undue hardship for the Company.

The Company will also attempt to reasonably accommodate the sincerely held religious beliefs or practices of applicants and employees pursuant to federal and state law. Any individual who requires a religious accommodation should notify a member of management or the Human Resources Department. An Associate will be required to utilize a vacation/PTO day, if available, to accommodate a day off for religious observation.

SECTION II: ASSOCIATE CONDUCT

It is particularly important that all Associates conduct themselves in a professional and appropriate manner to ensure a harmonious work environment.

These expectations are applied to Exempt as well as Non-Exempt Associates. The following behavior and/or actions are prohibited, will not be tolerated and will result in discipline up to and including termination:

- Use of rude, obscene, profane, offensive, embarrassing or abusive language toward co-workers, managers, guests or client
- Making or publishing false or malicious statements concerning any Associate, manager, guest, client, the public, the Company or its operation
- Unauthorized removal of Company records, Associate lists, or confidential information of any kind. The Company reserves the right at any time to inspect any and all packages (e.g., personal belongings) brought into or out of the building.
- No Associate shall take the property or money of another Associate, person, or the Company; this is considered theft or misappropriation
- Mischief, wrestling, pushing, throwing items, rough-housing, or any other kind of horseplay
- Unauthorized possession or use of firearms, concealed knives, explosives, or any other weapons, lethal or non-lethal, while on company premises, company business or during working hours
- Acts of physical violence, fighting, or endangering the health and/or safety of others. An Associate who threatens, intimidates, coerces, or interferes with the work of fellow Associates, managers, guests, or clients that could adversely affect the Company's business
- Willful neglect, damage, destruction, defacing, misuse, or sabotage of Company property
- Arguing with a manager, disrespecting a manager or supervisor, or unwillingness to carry out a direct and reasonable request of a manager is considered insubordination. If an Associate is asked by his/her supervisor to carry out a task that the Associate believes to be unsafe, unethical or illegal, he/she should contact Human Resources
- Working under the influence of illegal drugs or alcohol, or possession of illegal drugs or alcohol See Company Policy on "Unauthorized Use of Drugs and Alcohol" for more information.
- Misuse, alteration, concealment, falsification, or willful omission, from any Company record or report. The Company places trust in its Associates and expects its Associates to be honest.

The above is not an all inclusive list. Violation will result in discipline up to and including termination unless otherwise stipulated.

ATTENDANCE

Attendance is an essential part of total job performance and is critical to the efficient operation of the Company. Supervisors establish Associates' scheduled work time and Associates must report to work at their scheduled time to prevent being counseled for absenteeism/tardiness.

Unless otherwise protected by law, excessive absences, lack of proper advance notification, unauthorized absence from work, excessive tardiness, leaving work early, excessive breaks and not returning promptly from breaks, constitute unsatisfactory performance and will result in disciplinary action up to and including termination of employment.

If you will be absent from work, you should discuss your plan for returning to work with your manager. It is YOUR responsibility to ensure that proper notification is given. Another Associate, friend or relative can only notify management under emergency conditions.

Unless otherwise protected by law, if you are absent from work for three (3) consecutive days or more for health-related reasons, you must have an official doctor's note stating that you can return to work and perform your duties. An absence of more than five (5) consecutive days is considered an extended illness (see LEAVES OF ABSENCES).

Due to the varying nature of our businesses, each subsidiary and/or operating unit may have a specific attendance policy to which you must adhere.

CLOSE PERSONAL RELATIONSHIPS

Generally, it is not the intent of the Company to regulate off-duty conduct of Associates except to the extent that such conduct may be illegal or affects work for the Company, such as conduct that interferes with the positive work environment that the Company tries to make available for all Associates, free of offensive behavior.

A close personal relationship includes a romantic or intimate relationship between two Associates, regardless of whether they are the same or opposite sexes. A close personal relationship also includes a family relationship. For purposes of this policy, a family relationship includes spouse, child, stepchild, parent, grandparent, brother, sister, aunt, uncle, niece, nephew or grandchild, whether by blood or marriage.

If a close personal relationship exists or develops between Associates who report one to the other directly or through the organizational structure, the Associates are required to disclose the relationship to the Subsidiary President, Human Resources Business Partner and/or the Vice President of Human Resources. The Company will work with both individuals to try to separate their employment responsibilities from their personal relationship in order to protect the interests of both Associates and others.

Failure to disclose a close personal relationship may result in the termination of employment of the individuals involved in the relationship.

CORRECTIVE COUNSELING

In order to establish uniformity of corrective counseling, the Company has established guidelines, which should be consulted in cases of Associate discipline. Each individual case is different; therefore, the guidelines provide sufficient latitude in dealing with the issue while still maintaining internal consistency. The Company follows a progressive approach to discipline, applying

increasingly severe measures for repeated violations of performance, conduct, and/or attendance deficiencies. Management is not bound by progressive counseling steps in cases of serious offenses. An Associate should be aware that serious offenses may result in immediate termination. When the recommendation for counseling is termination of an Associate's employment, or elevated level of counseling, due to a gross conduct infraction, management should contact the Home Office Human Resources Department prior to initiating the termination.

Corrective Counseling Philosophy:

All associates of the Company are to be treated with the utmost dignity and respect. Rules, policies and procedures exist in order to ensure a safe, positive working environment. Should an associate violate one of the company's rules, procedures or policies, it is imperative that the counseling is administered in a fair, consistent and equitable manner. Corrective counseling follows a progressive approach which provides the opportunity to correct, retrain and educate the associate under the standards established; it is not to be used as a punitive measure.

A counseling is a document that serves to inform an Associate of issues that are not acceptable. It gives notice to the Associate that such issues will not be tolerated and that further action will be taken if issues persist. A counseling should precede a termination except where an Associate commits a serious policy violation. The purpose of issuing counseling is to ensure that the Associate is fully aware of the issue and what improvement is expected, thereby enabling the Associate to avoid a recurrence of the issue. Counselings, including the termination counseling and suspension, must be recorded on the Record of Associate Counseling form, discussed with and signed by the Associate and/or signed by the witness and the manager administering the counseling, and placed in the Associate's personnel file.

The following is a guide for the progressive counseling steps:

Verbal Counseling:

Written Counseling:

Final Counseling:

Termination:

In addition, in instances of significant policy violations an Indefinite Counseling may be used outside of the progressive steps.

DISTRIBUTION OF INFORMATION

The Company is concerned about the confidentiality and security of its Associates and of the Company itself. Associates may not provide any of the following information to outside sources:

- Current or former Associate information;
- Associate lists or names;
- Company financial, proprietary or other confidential information;
- References for current or past Associates, verbal or in writing; and
- Credit-related information.

Any questions regarding the appropriate response to requests for such information should be directed to the Corporate Human Resources department and/or the Corporate Law Department.

ELECTRONIC DEVICES

Use of iPods, MP3 players, tape players and tape recorders, head phones, radios, televisions, DVD players, cell phones, beepers, or any other personal communications equipment is not permitted at any time unless used in conjunction with one's job and otherwise authorized by management. Playing of radios during working hours is also prohibited unless management approval is obtained.

Associates are discouraged from bringing such personal communications items to work with them, even if only for use during personal time. The Company is not responsible for safeguarding an Associate's personal items.

FREE FOOD OR MERCHANDISE

Associates of the Company are prohibited from giving away free food, drink, or any other merchandise to anyone, including guests and Associates, unless special approval is granted by management. Giving away food is considered to be theft and will result in termination.

GAMBLING

Engaging in gambling, games of chance, card playing, or betting on Company property during working hours is strongly discouraged, and may be prohibited at many locations. Gambling materials of any kind are not allowed on the premises. Any Associate violating this policy may be terminated. Associate should refer to their unit's House Rules for further information.

INTRODUCTORY PERIOD

All newly hired or rehired Associates must complete an introductory period for the first ninety (90) calendar days of employment, not including periods of absences. During this period, an Associate's work performance, conduct and attendance will be evaluated by Management. An Associate may be terminated at any time during the introductory period, for any reason. Completion of the introductory period does not create a contract that guarantees employment for any specified time. Associates should refer to their unit's House Rules for further information.

LOITERING

Associates are to report to work at their scheduled start time. Coming in to work unnecessarily early or remaining after a scheduled shift to socialize is not allowed (unless otherwise protected by law). Associates should report to their assigned area immediately upon receiving an assignment and are to leave the premises promptly when the duties for the day are completed.

Wasting time or loitering in bathrooms or break areas after completion of authorized break times is prohibited.

Friends and relatives of Associates, as well as Associates who are on break, should be discouraged from loitering around work areas.

SOCIAL MEDIA POLICY

Generally, it is not the intent of the Company to restrict an Associate's off duty use of Social Media, except to the extent that such conduct is illegal, violates the legal rights of others, is damaging to the reputation of the company, discloses confidential information or violates the Company's Code of Conduct, Policies or Work Rules applicable to a particular subsidiary, unit location or position.

The term "Social Media" shall include multi-media and social networking Web sites (including, but not limited to websites such as MySpace, Facebook, LinkedIn, Twitter, Yahoo!Groups and YouTube), Blogs (both Company Blogs and Blogs external to the Company) and Wikis, such as Wikipedia and any other site where text and/or imagery can be posted.

"Authorized Spokespersons" are Associates who have been authorized to use Social Media as a spokesperson on behalf of the Company, a Company subsidiary or location and who have completed the certification process described below. You are considered to be "Acting in the Role of an Authorized Spokesperson" when you successfully complete the Social Media Certification Process, identify yourself as an Associate of the Company or make a response to an issue or topic related to our business interests in any and all media space, including but not limited to, social media sites.

With respect to Social Media, "Unauthorized Associates" are Associates who are not Authorized Associates and/or who are using Social Media for purposes other than for which they have been authorized. Unless prior authorization is received, you may never suggest that you are speaking on behalf of the Company when presenting your views in any media forum including social media forums. Associates also should not discuss the Company's services unless specifically authorized by the Company. In the event an Associate is authorized to make statements concerning the Company's services, he or she must disclose that he or she is employed by the Company.

The Corporate Communication Department has established a certification process by which Associates are authorized by the Company, a company subsidiary or location, to use Social Media as an approved spokesperson. Necessary training must be completed before such certification is authorized. The Corporate Communication Department reserves the right to revoke such certification at any time. Upon termination of employment, authorization to act as an approved spokesperson for the Company is automatically revoked. Authorized Associates, who in their use of Social Media, violate the Company's Code of Conduct, Policies or Work Rules or who engage in conduct that is illegal or violates the legal rights of others, will be subject to discipline, up to and including termination.

Unauthorized Associates who in their use of Social Media violate the Company's Code of Conduct, Policies or Work Rules or who engage in conduct that is illegal or violates the legal rights of others, will be subject to discipline, up to and including termination.

In addition to discipline, up to and including termination, unauthorized and authorized Associates who in their use of Social Media violate the Company's Code of Conduct, Policies or Work Rules or

who engage in conduct that is illegal or violates the legal rights of others, will be subject to all other legal remedies available to the Company. ***None of the restrictions under this Policy shall be construed to violate any law, including, but not limited to the National Labor Relations Act.***

SOLICITATION OF TIPS

Solicitation of tips is prohibited and will result in disciplinary action. Tip cups in guests' view is considered solicitation and will not be permitted. The Company reserves the right to confiscate any displayed tip cups.

TELEPHONE USE

Associates are allowed to receive and make emergency personal telephone calls with the approval of a supervisor. Non-emergency personal phone calls, and texting, incoming or outgoing, are not permitted while on duty. Please refer to your unit's specific House Rules for more information.

UNAUTHORIZED USE OF DRUGS AND/OR ALCOHOL

To provide a safe, healthy and secure work environment, it is the policy of the Company to prohibit the use and/or possession of unauthorized drugs and/or to restrict the possession and/or use of alcohol. Please refer to the Company Policy Manual for detailed definitions and further information.

Associates must report to work sober and free from the influence of illegal drugs and alcohol, and they must remain in that condition while on the job in order to protect themselves, guests, other Associates, and Company property. Any Associate who is observed engaging in behavior that suggests that the Associate may be under the influence of drugs or alcohol while at work will be subject to immediate drug testing.

This Policy applies to all Associates (1) while on the premises of the Company during working hours and immediately before and thereafter, (2) during attendance at any Company-sponsored event, and (3) during any Company-sponsored travel.

Appropriate and Inappropriate Conduct

During Working Hours

The possession or use of an unauthorized drug, alcohol or drug related paraphernalia in any amount on Company premises during hours the Associate is working or expected to be working, including immediately before and after work hours, or during rest or meal breaks, is prohibited.

Associates shall not report to work under the influence of any amount of an unauthorized drug, or unless a more restrictive limitation applies because of the nature of the Associate's position, having a blood alcohol concentration exceeding 0.02, or 2%, by volume.

Violation of this Policy will be subject to discipline up to and including termination.

During Non-Working Hours on Company Premises

The possession or use of an unauthorized drug or drug related paraphernalia in any amount on Company premises during non-working hours is prohibited. This includes, but is not limited to, associate housing and transportation, lodging and restaurants when used in connection with Company related business or Company sponsored social functions.

Unless otherwise prohibited by a policy specific to a Company unit or the work performed by the Associate, the moderate use of alcohol on Company premises during non-working hours (other than immediately before working hours) is allowable. However, Associates will be subject to corrective action for any behavior unbecoming of an Associate of the Company.

Company Sponsored Social Functions

Alcohol may be served at Company sponsored social functions with the prior approval of the Company and/or Subsidiary President. Associates will be subject to corrective action for any behavior unbecoming of an Associate of the Company.

Drug Testing

All applicants for employment with the Company will be subjected to a pre-employment drug test because being free of illegal drugs is an essential requirement for every position. Unless prohibited by state law, the Company reserves the right to require an Associate to submit to a drug or alcohol test in situations where the Associate is involved in an accident or an incident and where there is reasonable cause to believe that an Associate may be at work under the influence of illegal drugs or alcohol.

If a prescription drug may affect an Associate's job performance, he/she should inform management.

For Cause Testing:

The Company may ask an Associate to submit to a drug and/or alcohol test when the Associate's behavior indicates a possible violation of this policy. Such behavior may include, but not be limited to: unauthorized drugs or alcohol on or about the Associate's person or in the Associate's vicinity; or unusual conduct on the Associate's part that suggests impairment or influence of unauthorized drugs and/or alcohol (including, but not limited to, slurred speech, staggering walk, difficulty standing, erratic or irrational behavior, belligerence, glassy or dazed eyes, and smell of alcohol on the Associate's breath).

If any of these signs are observed, the manager must have the behavior witnessed by at least one other manager or supervisor. If the Associate is part of a bargaining unit, the manager may also ask a union representative to witness the behavior.

The Company may ask an Associate to submit to testing as soon as the behavior is observed. The Company will also review the policy and obtain the Associate's signature on the Consent and Release Form. Refusal to submit to the drug and/or alcohol test shall be grounds for immediate termination of employment.

Post-Accident Testing:

Any Associate who is involved in an on-the-job accident that requires medical attention either for the Associate or any other person, will be subject to immediate drug testing for alcohol or illegal drug use. For purposes of this application, "on-the-job" includes but is not limited to employment

(1) while an Associate is at his or her regular place of employment, (2) during attendance at any Company-sponsored event, and (3) during any Company sponsored travel.

Any Associate who refuses to sign a Consent and Release form or who refuses to be tested will be deemed to have voluntarily resigned.

Associates who are tested will be suspended pending the outcome of the investigation and the results of the alcohol or drug test.

UNIFORMS/WORK ATTIRE

Associates must wear uniforms if designated by management. Uniforms are to be kept clean and neatly pressed. If they are not, an Associate will not be allowed to work.

Associates are also required to wear identification badges (unless otherwise protected by law). No other badges or buttons can be worn on the uniform without management approval.

Associates sign for uniforms upon issuance and are responsible for such uniforms and for loss or misuse thereof. Associates will be expected to pay for lost uniforms and uniforms damaged beyond normal wear and tear, unless otherwise prohibited by state law.

Associates should be in full uniform at all times during work hours (unless otherwise protected by law). If the Associate does not wear the complete uniform, he or she will not be allowed to work. (At no time will street clothes be worn on the job.) Uniforms should not be worn outside the premises, except while an Associate is commuting to and from work.

It is necessary to return uniforms and badges at the time of termination of employment or layoff. An Associate will be required to pay for the replacement cost of the uniform and/or badge if they are not returned (unless otherwise prohibited by state law).

SECTION III: PAY AND PROGRESS

CAREER OPPORTUNITIES

The Company makes every effort to promote from within, with due regard for Associates' interests, service qualifications, and the needs of the business and without discrimination due to race, color, religion, sex, national origin, age, disability (or perceived disability), marital status, sexual orientation or veteran status.

The Company provides equal employment opportunities for Associates wherever and whenever possible by providing a posting system for Exempt employment opportunities within the Company.

HOURS OF WORK

The following guidelines are provided for Non-Exempt Associates as it relates to hours of work. Associates need to report to their supervisor at their scheduled starting time for work assignments. Associates are to punch-in at the time clock (or sign in) and be in proper uniform ready to work at the time posted on the schedule. Once an assignment is received, an Associate is to report immediately to the assigned workstation. Any Associate reporting to work past the scheduled starting time may not be permitted to work that particular day.

All workstations are to remain open until officially closed by management. Associates are to remain on duty until their job is complete and until their approved leaving time, unless otherwise informed by management.

Stopping work or making preparations to leave work before the established time for breaks and leaving is not allowed. Associates should promptly clock out or sign out when duties of the day are completed and immediately leave the premises.

Associates need to indicate the time when they report for and when they leave work, either through a sign-in sheet or time clock. Under no circumstances is an Associate allowed to record someone else's time on a time card or sign-in sheet.

Breaks are arranged and approved by management. If an Associate must leave a location, the Associate should inform the supervisor.

There is to be no eating, drinking, or smoking in front of any work location or at portables. Meal breaks should be taken in designated areas away from guests.

OVERTIME

Whenever applicable, all overtime must be recorded and approved by management in advance and time cards initialed by the immediate supervisor, or approved by manager in Time Manager.

PAYCHECKS

Paychecks are dated for the actual payday and should be distributed on that day.

Exempt Associates are paid semimonthly on the 15th and last working day of the month.

If the pay date falls on the weekend or a national bank holiday, paychecks will be dated the previous business day.

At most locations, Non-Exempt Associates are paid each Friday for the previous week worked ending Sunday. If a national bank holiday falls on that Friday, paychecks will be dated the previous day. Check distribution methods vary from location to location therefore Associates need to inquire as to the specifics of this process at their location. A check may not be picked up for someone else without prior written permission from that person.

Should an Associate legally change his or her name (i.e. through marriage or divorce), the Associate must obtain a new Social Security card reflecting the name change. They must notify the Human Resources department of the change so that the Associate's name change is reflected on payroll records in compliance with Federal and State regulations.

PERSONNEL FILES

Non-Exempt Associates' official personnel records are maintained at their respective unit of operation. Exempt Associates' records are maintained primarily at the Corporate Office, however some exceptions may exist. To protect the Associates' interests, personnel files are strictly confidential and will not be disclosed to persons outside the Company or to non-management Associates except with Associate consent, or as may be required by law or legal process. The Company only collects information that is pertinent to employment and makes every effort to maintain accuracy.

Requests to review personnel files must be referred to the Corporate Human Resources Department or as provided by applicable state law. Associates may review certain materials other than pre-employment documents in their own file with a representative from the Human Resources Department present upon reasonable notice during normal business hours. Direct line of management also may view an Associate's personnel file. Management Associates may review certain materials in the personnel files of their direct reports.

RESIGNATION

In the event that an Associate decides to resign, it is the Associate's responsibility to notify his or her immediate manager, in writing, at least two (2) weeks in advance.

A two-week notice period allows management to arrange for uninterrupted performance of the Associate's job responsibilities, conduct an exit interview, discuss insurance conversion options and other pertinent Associate benefit matters with the Associate, and arrange for distribution of the Associate's final paycheck, which includes payout of any unused earned vacation.

SCHEDULING

Schedules are posted in advance to indicate days and hours Associates are required to work and where they are to work. Associates are responsible for checking the schedule to confirm when they work next. Associates should refer to their unit's specific House Rules for more information.

SEPARATION

When an Associate separates from the Company, pay for work performed through the last hour of work within the time frame established by law will be discussed and handled for the individual.

TIME KEEPING

Please refer to your unit's specific House Rules for time keeping procedures.

TIPS REPORTING

The Company complies with all IRS tip reporting requirements. In keeping with these IRS requirements, tip declaration is a mandatory obligation of a tipped Associate. Recording each associate's tip declaration and gross receipt information in PeopleSoft Time Entry is a mandatory requirement of each unit.

VERIFICATIONS/REFERENCES

The Company will verify an Associate's current job title and dates of employment after the company has received a written authorization from the Associate.

The Company will not provide employment references for its former Associates other than stating the Associate's job title and dates of employment. This will be released after the Company has received written authorization from the former Associate through The Work Number at 1-800-367-5690.

WORK CANCELLATIONS

At times, due to circumstances beyond management's control, a shift may be canceled. When this occurs, management will make every effort to contact Associates. It is the Associate's responsibility to provide management with the correct phone number(s) of where he or she may be reached during non-working hours. Should this occur, the Associate is not eligible for pay for the canceled shift.

SECTION IV: WORK RULES & PROCEDURES

ACCEPTABLE USE POLICY

It is the Company's intention to provide each associate reasonable access to technology required to fulfill the responsibilities of his/her position. It is also the objective of the Company to adequately safeguard the computing environment to ensure appropriate integrity of the data generated, maintain the confidentiality of our clients and customers account information and reasonably protect the investment the Company has made in this technology while maintaining the appropriate availability of data as required.

It is the responsibility of each individual user to adhere to the guidelines set forth in this policy. It shall be made clear to all associates that all company provided computer hardware, software and data that is owned and operated by the Company, its subsidiaries and affiliates, are the sole property of the Company. Associates who violate any of these guidelines will be subject to disciplinary action which may include termination.

ALCOHOL SERVICE

Serving of or giving alcoholic beverages to a minor or an intoxicated person and/or a habitual alcohol abuser is against the law and will result in disciplinary action up to and including termination. Both the Associate who dispenses or serves alcoholic beverages to these individuals and the Company may be subject to civil and criminal legal action. Whether or not the server intended to violate the law or even know that he or she was violating the law is irrelevant. The Company has a zero tolerance policy regarding individuals who violate this Policy or any applicable Alcohol Service Rules. Therefore, extreme caution is urged. The following guidelines will help prevent unintentional violations:

- All guests who appear to be 30 years of age or younger must be asked for identification. A unit may adopt a more stringent identification procedure which must be followed. When in doubt about the age of a guest, ask for identification: a driver's license, passport, a state issued identification card, or a military ID. This is the only acceptable identification. Check the age, the name, the picture and expiration date, and make sure the documents have not been altered. If there is any doubt in an Associate's mind regarding the ID, the guest should not be served. Being fooled is not an acceptable defense.
- If a guest is intoxicated or appears to be under the influence of alcohol (speech is slurred, the guest is stammering, or incoherent, etc.), the guest should be denied service. If a guest becomes unruly because service is denied, contact a supervisor or security immediately.
- Any person known to be a habitual alcohol abuser because of the frequency of heavy drinking in your presence (for example, by virtue of the guest's appearance, demeanor, or actions), should be refused service. Again, it is the Associate's responsibility to be careful.
- If a guest becomes agitated or otherwise displeased because an Associate is complying with the above guidelines, the Associate should contact his/her supervisor to address the guest's concerns.

An Associate will not receive a reprimand for refusing to serve a guest an alcoholic beverage for reasons regarding prohibited sales. Drinking alcoholic beverages is a privilege, not a right, and as a server of alcohol, an Associate is responsible for determining if the guest ordering the beverage is (a) of legal drinking age, and (b) not intoxicated.

In addition, all individuals who serve alcohol on behalf of the Company shall be properly trained in alcohol management and service. All such individuals shall complete Alcohol Service Training during the orientation process and at least annually thereafter.

Alcohol Service – Additional Rules Governing Sales

Alcoholic beverages should not be prepared in advance to "beat the rush." All bottles of alcoholic beverages must be properly and accurately labeled.

Do not serve a guest a brand which is different from the one he/she ordered. If the brand is unavailable, inform the guest and ask for another selection, or make a suggestion.

The brand name of beer being sold from the taps must be shown on a plate affixed to the tap. Alcoholic beverages are not to be diluted nor transferred between containers.

Alcoholic beverages are not to be given away, nor are they to be sold at less than the stated/posted retail price.

No alcoholic liquor is to be dispensed except from bottles, the size specified by the liquor authority, and upon which the appropriate excise taxes have been paid.

Containers of alcoholic beverages must be consumed on the premises and may not be removed by the guest even though partially consumed.

Sales cannot be made during prohibited hours. Check with management for what hours are prohibited and ensure these regulations are enforced.

Alcohol Service Policy

A. Alcohol Service Training

All individuals who serve alcohol on behalf of the Company shall be properly trained in alcohol management and service. All such individuals shall complete Alcohol Service Training during the orientation process and at least annually thereafter. At all units operating at seasonal venues, such individuals shall complete Alcohol Service Training during the orientation process and prior to commencement of each season. All Exempt Associates should become familiar with the Company's Alcohol Service Training Policy and Program Requirements, which can be found in the online Company Policies.

The Company has a zero tolerance policy regarding individuals who violate this Policy or any applicable Alcohol Service Rules. Any individual found to be in violation of this Policy or any applicable Alcohol Service Rules will face disciplinary action up to and including termination.

Alcohol Service Discipline Policy

For purposes of this policy, “Supervisory” is defined as any Associate, whether hourly or salaried, who is responsible for providing direction or assigning work to other Associates.

Supervisory Associates

The following guidelines apply to situations involving violations by a supervisory Associate:

Step I – Single infraction resulting in termination:

Knowingly placing an untrained or minor person, as defined by State law, in a position of alcohol service; or

Falsifying training records.

Step II – Single infraction resulting in counseling:

Permitting an untrained or minor person to serve alcohol within the unit.

Counseling imposed under this section will remain in effect for 12-months from the date the document is issued. The document will become inactive if there are no further infractions of the Company’s Alcohol Service Policy within the 12-month period. Termination will occur if a second Step II violation occurs within the 12-month period.

Step III – Single infraction resulting in progressive discipline (verbal, written, final, termination):

Failure to have training program approved; or

Failure to have proper training records on file.

Discipline under this section applies only where the individual was, in fact, trained.

Application of discipline steps dependent upon structure and reporting lines.

Non-Supervisory Associates

The following guidelines apply to situations involving violations by a non-supervisory Associate:

Step I - Single Infractions Resulting in Termination:

Serving a visibly intoxicated guest; or

Serving a minor; or

Any other violation of law; or

Service of more than the allowed number of drinks to a guest; or

Violation of a rule established by a unit in which Associates have signed a written acknowledgment that a single violation will result in termination.

Step II - Single Infractions Resulting in Indefinite Counseling and Retraining:

Failure to proof (not resulting in service of a minor); or

Any other violation of our corporate Alcohol Service Policy (other than service of more than the allowed number of drinks to a guest); or

Violation of any unit specific alcohol service rules, if there is no written acknowledgement by the Associate that a single infraction will result in termination.

Termination will occur if a second Step II violation occurs during the Associate’s course of employment.

The above list of violations is not exclusive. Associates terminated under this policy are not eligible

for rehire. In addition, concurrent Associates terminated for cause under this policy will be terminated from all company locations.

Variations from the discipline steps cannot occur at the unit level. In extraordinary circumstances, the unit can initiate a request for a variation by contacting the Vice President of Human Resources and Director of Labor Relations (if a union represented Associate) and the applicable Regional Vice President of the subsidiary involved.

No variation can be approved without the concurrence of the Corporate Vice President of Human Resources and the Operating President of the subsidiary involved.

CASH HANDLING

Associates are responsible for all money and merchandise entrusted to their care and for money to which they have access. Failure to safeguard this money or merchandise will result in disciplinary action up to and including termination.

Shortages/overages will be investigated by management. If cash handling policies and procedures are violated, the Associate will be subject to disciplinary action. Substantial shortages may result in termination.

Associates are subject to Cash Handling policies and procedures that vary depending upon subsidiary and location. Associate should refer to their unit's House Rules for further information.

CREDIT CARD HANDLING

A fundamental expectation by our guests is that we will handle their cardholder data safely and securely. The Company is required to meet standards regarding the safe handling of our customers' sensitive credit card data. These requirements comprise a data security standard established by the credit card companies. In order to keep accepting credit cards, we must become compliant and remain compliant as it relates to the handling and processing of credit cards and all related documents and systems. Credit Card Handling applies to all management, supervisory and all other associates responsible for the appropriate processing, handling, protection and retention of credit card and related information for the Company, as detailed in the Credit Card Information Handling Procedures.

Credit Card Handling Discipline Policy

For purposes of this policy, supervisory and management is defined as any associate, whether hourly or salaried, who is responsible for providing direction or assigning work to other associates.

Supervisory and Management Associates

The following guidelines apply to situations involving violations by a supervisory or management associate:

Step I – Single infractions resulting in termination (associate should be suspended pending complete investigation):

- Knowingly placing an untrained or unapproved associate or unapproved third party, as defined by Company Credit Card Handling Procedures (ref. 2.1 or 5.1), in a position whereby that associate or third party would have access to credit card information or systems containing such information.
- Unauthorized use or allowing another to have unauthorized use of a credit card or information from a credit card.
- Intentionally withholding information regarding an actual or suspected breach; including not taking action to limit ongoing exposures or retention of critical information as defined by Company Credit Card Handling Procedures (ref. 4.1 and 4.2).
- Failure to follow assigned responsibilities per Credit Card Handling Procedures that results in a breach of credit card information.
- Falsifying training or system access records.

Step II – Single infractions resulting in final warning:

- Unknowingly permitting an untrained or unapproved associate or third party to handle or have access to systems/areas containing sensitive credit card information within the unit.
- Making unapproved changes to local systems or environments that will/may result in the location falling out of PCI compliance.
- Not performing or submitting an annual review of the Company Credit Card Information processing environment as required by The Company Corporate Treasury policy.
- Not establishing proper guidelines for the Company Credit Card Information processing environment as it relates to new or assumed locations.

Final warning imposed under this section will remain in effect for 12-months from the date the Record of Associate Counseling is issued. The Record of Associate Counseling will become inactive if there are no further infractions of the Company's Credit Card Handling Policies within the 12-month period. Termination will occur if a second Step II violation occurs within the 12-month period.

Step III – Single infractions resulting in progressive discipline (verbal, written, final, termination):

- Failure to deliver the *Company approved* training program(s) and security awareness programs; or
- Failure to have proper training records on file.
- Failure to follow assigned responsibilities per Credit Card Handling Procedures that will/may result in the location falling out of PCI Compliance.

At the discretion of the Company Corporate Senior Management, upon consultation with Human Resources, any associate that receives a bonus incentive may have any part of, up to and including the entire incentive, rescinded as penalty for violating the Credit Card Handling Procedures. Associates that have received a final warning in the Plan Year for which the incentive is being paid, or in the period following the Plan Year before payment is made, may not be eligible for an incentive payment. Any Management associates may have any part of, up to and including the entire incentive, rescinded as penalty if *any associates within their authority* (dependent upon structure and reporting lines) violate the Credit Card Handling Procedures.

Application of discipline steps is dependent upon structure and reporting lines.

Non-Supervisory Associates

The following guidelines apply to situations involving violations by a non-supervisory associate:

Step I - Single infractions resulting in termination (associate should be suspended pending complete investigation):

- Intentionally allowing or providing an unapproved associate or third party access to credit card information and/or environments.
- Unauthorized use or allowing another to have unauthorized use of a credit card or information from a credit card.
- Knowingly withholding information regarding a breach of credit card information or systems when an inquiry is raised.

Step II - Single infractions resulting in final warning and retraining:

- Not properly utilizing and/or securing electronic transfer devices, including stand alone payment transfer devices, that process or store credit card information as defined by Company Credit Card Handling Procedures (ref. 3.1 and 3.2).
- Improper handling and/or processing of manual credit card transactions; to include the proper protection/storage of manual receipts as defined by Company Credit Card Handling Procedures (ref. 3.3).
- Unintentionally withholding information regarding a ***suspected or definitive*** breach of credit card information or systems.

Final warning imposed under this section will remain in effect for 12-months from the date the Record of Associate Counseling is issued. The Record of Associate counseling will become inactive if there are no further infractions of the Company's Credit Card Handling Policies within the 12-month period. Termination will occur if a second Step II violation occurs within the 12-month period.

COMMUNICATIONS

It is the Company's objective to earn, maintain, and enhance public and governmental confidence in the Company and all its subsidiaries as a supplier of quality products and services, a good place to work, a growing, well-managed, reputable company and a socially-responsible corporate citizen. Information provided to the media through relationships and contacts is of prime importance because public and governmental perception of the Company is largely gained through what is seen and read in the media.

All contacts with the media, at whatever level and whatever location, must be channeled to the Company's Home Office Communications Department for proper handling, unless otherwise protected by law. ***None of the restrictions under this Policy shall be construed to violate any law, including, but not limited to the National Labor Relations Act.***

ELECTRONIC MAIL (E-MAIL)

The Company has established a policy regarding electronic mail (e-mail) messages created, sent or received using the Company's electronic mail system and/or any Company-provided email service via the Internet.

The Company maintains an electronic mail system to facilitate business communication within the Company and with outside entities. Only authorized Company Associates and other persons specifically authorized by the executive in charge of the department or subsidiary in which such person is employed or doing business ("Authorized Users") may use the Company's e-mail system.

The use of the electronic mail system is reserved solely for conducting Company business. It may not be excessively used for personal matters. This policy prohibits creation, downloading, posting or dissemination of harassing, threatening, discriminatory or defamatory messages or material.

Electronic harassment violates the Company's anti-harassment policy. Harassment via the Internet or e-mail will not be tolerated.

If you violate this policy or use the electronic mail system for improper purposes you will be subject to corrective action, up to and including termination of employment.

INTERNET USE

Internet/Intranet/Extranet-related systems, including but not limited to computer equipment, software, operating systems, storage media, network accounts providing electronic mail, WWW browsing, and FTP, are the property of the Company. These systems are to be used for business purposes in serving the interests of the company, and of our clients and customers in the course of normal operations.

Associates are responsible for exercising good judgment regarding the reasonableness of personal use. Further guidelines and prohibited activities are provided in the Acceptable Systems Use Policy, available on the online Company Policies. Associates are expected to be familiar with, and abide by, this policy. Any associate found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

PORTION CONTROL

Portion control is extremely important in the service of food and beverages to guests. Specific portions have been established for all products sold by the Company. Every product sold should be dispensed in the correct portion according to these standards, using the proper procedure for filling the order. Failure to do so will result in disciplinary action up to and including termination.

PROMOTIONAL ITEMS

Associates are not eligible to receive promotional items offered by the Company or its respective clients. Associates may not socialize, elicit/accept services or autographs/promotional items from

players, a player's family, or other celebrities or agents of the building tenants.

REFERRALS

Associates are encouraged to refer candidates for employment, and may be eligible to receive a referral bonus. Candidates referred by Associates will be responded to in timely manner and, like all other candidates, will receive equal opportunities in the employment process. Details surrounding the Associate Referral Incentive Program can be found in the online Company Policies.

REFILLING OF CUPS

Alcoholic and non-alcoholic drinks are to be sold only in cups designated for each type of drink. These cups are not to be reused or refilled for any further drinks. Refilling is defined as:

- Sale of a beverage in a used, washed, soiled or unauthorized cup; or
- Possession of a used, washed, soiled or unauthorized cup in a stand or bar.

Cups are to be crushed and removed from the counter after use and before placing in trash receptacles. Soiled or defective cups should be crushed and accounted for appropriately. Merchandise is not to be served or consumed other than in accordance with these regulations. Failure to comply with this policy will result in termination.

SOLICITATIONS

Unless otherwise required by law, the Company prohibits the solicitation, distribution and posting of materials on or at Company property by any associate or non-associate, except as may be permitted by this policy. The sole exceptions to this policy are charitable and community activities supported by the Company's Contributions policy and company-sponsored programs related to the Company's products and services.

With the exception of the Company sponsored campaigns, or other periodic company sponsored activities; Associates may not distribute literature or other materials for any purpose not directly related to their assigned work, during their own working time or during the working time of other associates, to whom distribution is made. Associates are not permitted to distribute literature or materials, sell any item, post literature or personal materials on Company property without proper authorization from the Company's Vice President of Human Resources.

Associates are not permitted to solicit other associates for any other purpose not related to their assigned work on Company property (including the parking lot) during their own working time or during the working time of the associates being solicited. The distribution of any literature or other written material within working areas or customer areas is also prohibited. Associates are permitted to solicit other Associates for lawful purposes during their non-working hours, in non-working and non-customer areas, such as parking lots and lunchrooms. Non-associates are prohibited from soliciting or distributing literature on any Company premises. ***None of the restrictions under this Policy shall be construed to violate any law, including, but not limited to the National Labor Relations Act.***

SECTION V: HEALTH, SAFETY & SECURITY

PACKAGES

Associates are not permitted to bring personal belongings, cartons, packages, bags, boxes, etc. to work or to remove cartons or packages from the premises, unless approved by unit management. If Associates bring packages containing apparel or shoes, these are to be checked in the office or designated area or carried in a clear bag.

The Company reserves the right at any time to inspect any and all packages (e.g. personal belongings) brought into or out of the building.

SAFETY

The safety and health of all Associates is important to the Company. We expect all of our Associates to be safety conscious and to immediately inform management of any conditions that might cause an accident.

For the protection of all Associates, any unsafe conditions, injuries or accidents must be reported to management within 24 hours. Medical treatment should be obtained for all serious injuries.

In the event of either a major accident or severe illness, individuals should not be moved. A manager should be called immediately and the proper individuals contacted.

Associates should also refer to their unit's House Rules for specific Safety procedures and guidelines.

SANITATION

It is important that all Associates observe and follow proper sanitation guidelines to ensure "safe" food for all guests.

Personal sanitation is most important. Harmful germs contaminate food through infections, coughs, dirty bodies and clothing, and poor personal hygiene (such as not washing hands with soap). Always use proper hand-washing techniques including; frequent washing, use soap and scrub hands, palms and fingers for the amount of time it takes for you to recite your ABC's.

- Never touch the rim of a clean glass or the eating surface of silverware.
- Never touch food with your hands – always use utensils.
- Eat only during breaks and away from the kitchen. Remember to wash hands before returning to work.

Associates should also refer to their unit's House Rules for specific Sanitation procedures and guidelines.

SECURITY PRECAUTIONS

It is the objective of the Company to report and effectively handle any breaches of security in order to protect the Company's assets as well as maintain integrity and a good rapport with Associates and the public. Any issues surrounding security, including, but not limited to, loss, theft, personal security matters (such as criminal activity, falsification of records), investigations, proprietary information, third-party investigations, and possession of firearms, should be directed, discussed and/or reported to the Director of Security.

All losses, thefts and unexplained disappearances of property should be immediately reported to the manager having responsibility for the particular operation involved. The manager shall conduct an investigation, if necessary, and report the results to his/her immediate manager, who will contact the Director of Security.

Matters of a confidential nature are proprietary information and must be protected against loss, destruction, tampering and unauthorized disclosure. Such information is inclusive of, but not limited to the following: information regarding acquisitions and dispositions of entities or assets, financial and operational plans and information and personnel records.

No Associate is authorized or permitted to carry or possess a firearm on Company property unless it is in conjunction with his/her employment with the Company. Any Associate wishing to carry a weapon has to receive prior written authorization from the Director of Security.

Associates should refer to the online Company Policies for further information.

TRANSFER OF FOOD

Specific control procedures have been established when transferring food, beverages, or other merchandise from one location to another within the building. Associates must follow the directions provided to them regarding the transfer of products and required paperwork. Management needs to be aware of any transfer between locations.

UNAUTHORIZED AREAS

Unless an exception is given by management, Associates are prohibited from certain areas, including but not limited to Administrative Offices and Client Offices.

Only authorized Associates are allowed in the office, money room, and kitchen or commissary areas. Non-scheduled or non-working Associates should not be in the working areas of the facility during non-working hours for any reason, except with authorization of management.

WORKERS' COMPENSATION

All work related injuries should be reported to management within 24 hours. Questions regarding workers' compensation should be referred to the Corporate Risk Management Department. Associates who miss work due to a work related injury may be eligible for workers' compensation payments for hours/days lost. Associates cannot receive workers' compensation payments and

disability payments simultaneously. Additional information on Workers' Compensation can be found in the online Company Policies.

WORKPLACE VIOLENCE

The Company seeks to provide each Associate a work environment that is safe, secure, and free of prejudice, harassment, threats, intimidation and violence.

Conduct that violates this policy includes, but is not limited to, the following:

- Bringing to work any firearm, knife with a blade longer than three inches, except where prohibited,(unless such a knife is required to perform one's job), explosive materials, toxic agents, or any other weapon or device intended to be used as a tool of violence (e.g. chains, brass knuckles, baseball bats, tire irons, etc.)
- Threatening, intimidating, coercing, harassing any Associate or other person, through words or conduct (including verbal, physical and visual harassment), or intentionally creating discord in the business environment.
- Using, possessing, selling, giving away, or being under the influence of prohibited intoxicants or controlled substances on Company property and during and immediately before working hours.
- Unauthorized opening of or tampering with locks, fire protection equipment, or other Company property, unauthorized duplicating and using of company-issued keys or access cards, and entering into restricted or locked areas are prohibited
- Any other conduct or activity that threatens, causes, or coerces bodily injury, property damage, or business disruption

To ensure compliance with this policy, the Company reserves the right to conduct searches of any person, vehicle or object that enters onto any space owned, managed, or controlled by the Company. Pursuant to this provision, the Company is authorized to search lockers, desks, briefcases, baggage, toolboxes, lunch containers, clothing, vehicles parked on any space owned, managed, or controlled by the Company, and any other location in which a weapon or other contraband may be hidden. Additionally, the Company may search a vehicle owned by an Associate that is being used in the course of Company business, regardless of whether the vehicle is located on any space owned, managed, or controlled by the Company at the time. The Company may search an Associate's vehicle if the Company has reason to suspect that the vehicle may contain contraband or may be related to the Associate's violation of this policy.

Failure to abide by the terms of this policy described above may result in corrective counseling up to and including termination. If you become aware of anyone violating this policy, please report it to management immediately. Associates should refer to the online Company Policy on Workplace Violence for more information.

SECTION VI: OPEN DOOR

The Company believes strongly in maintaining an open-door policy with its Associates, encouraging contact with any member of management regarding questions or concerns.

There can be an honest difference of opinion about company policies, working conditions and any number of other areas that may be causing concern. However, the Company cannot correct these concerns until they have been identified.

The Company will make every effort to rectify the situation and answer your questions. An Associate's manager is in the best position to answer an Associate's questions or assist with concerns because he or she knows more about the person and the job than any other member of management. To discuss concerns, an Associate should follow this three-step process:

Step 1: Discussion with the Associate's immediate manager, who will assist in any way possible. There is a good possibility that the Associate's concerns will be resolved at this stage.

Step 2: Discussion with the manager's supervisor or Human Resources at your unit. If the situation remains unresolved or if the specific question involved makes discussion with the immediate manager inappropriate, the Associate should bring the concerns to the attention of this individual, followed by the Regional Vice President.

Step 3: Discussion with Corporate Human Resources. If a satisfactory resolution to the concerns is not reached after a discussion with the manager's supervisor, the Associate should bring the concerns to the Corporate Human Resources Department.

If an Associate is unable to resolve the matter at the unit level, Associates are encouraged to contact the Associate Hotline. Associates have the option of contacting the corporate headquarters directly at 1-800-828-7240 to speak with the corporate human resources department, or Associates may contact a confidential third party intake service at 1-800-441-5645.

ACKNOWLEDGMENT

I acknowledge receipt of the Company Associate Handbook and that I understand and will adhere to the guidelines therein. I understand that my failure to adhere to these guidelines may result in corrective action, up to and including termination of employment. Furthermore, I understand that these guidelines may be modified at any time under the discretion of the Company. I understand that the Handbook is not intended to create a contract between the Company and myself.

_____ Name (Please Print)

_____ Signed

_____ Date

To be placed in Associate's Personnel Folder

Revised January 2012