

TEAM MEMBER
HANDBOOK ACKNOWLEDGMENT
November 2013

Employee Handbook

The employee handbook describes important information about Rottinghaus Company, and I understand that I should consult the Human Resources Department regarding any questions not answered in the handbook. I have entered into my employment relationship with Rottinghaus Company voluntarily and acknowledge that there is no specified length of employment. Accordingly, either I or Rottinghaus Company can terminate the relationship at will, with or without cause, at any time, so long as there is no violation of applicable federal or state law.

Since the information, policies, and benefits described here are necessarily subject to change, I acknowledge that revisions to the handbook may occur, except to Rottinghaus Company's policy of employment-at-will. All such changes will be communicated through official notices, and I understand that revised information may supersede, modify, or eliminate existing policies. Only the Chief Executive Officer of Rottinghaus Company has the ability to adopt any revisions to the policies in this handbook.

Furthermore, I acknowledge that this handbook is neither a contract of employment nor a legal document. I have received the handbook, and I understand that it is my responsibility to read and comply with the policies contained in this handbook and any revisions made to it.

ROTTINGHAUS COMPANY



Team Member

EMPLOYEE HANDBOOK



ISSUE DATE: 8/1999
REVISED: NOVEMBER 2013



Welcome to Rottinghaus Company

Congratulations on becoming a Sandwich Artist for Rottinghaus Company.

There are over 40,000 Subway restaurants worldwide owned by individual franchises. Rottinghaus Company Inc. has been operating Subway's since 1988! Subway stores owned by Rottinghaus Company can be found in Kansas, Missouri, Oklahoma, Texas, Minnesota and Wisconsin. The administrative office is located in La Crosse, Wisconsin. Rottinghaus Company has developed a system with many levels of inspections, audits and policies that allows us to operate over a large area and maximize efficiency. This efficiency allows the company to create opportunities for individuals who excel at their jobs to advance within the company.

It is our desire to supply you with tools needed to become a successful employee. This handbook is designed to acquaint you with Rottinghaus Company and provide you with information about working conditions, employee benefits, and some of the policies affecting your employment. You should read, understand and comply with all provisions of the handbook as it describes many of your responsibilities as an employee and outlines the programs developed by Rottinghaus Company to benefit employees. One of our objectives is to provide a work environment that is conducive to both personal and professional growth.

No employee handbook can anticipate every circumstance or question about policy. As Rottinghaus Company continues to grow, the need may arise and Rottinghaus Company reserves the right to revise, supplement, or rescind any policies or portion of the handbook from time to time as it deems appropriate, in its sole and absolute discretion. The only exception to any changes is our employment-at-will policy permitting you or Rottinghaus Company to end our relationship for any reason at any time. Employees will, of course, be notified of such changes to the handbook as they occur.

We look forward to your success with our Company and if you have any questions or concerns do not hesitate to ask!

Thank You,

Don & Dennis Rottinghaus

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INTRODUCTION

INTRODUCTORY PERIOD

The introductory period is intended to give new employees the opportunity to demonstrate their ability to achieve a satisfactory level of performance and to determine whether the new position meets our expectations. Rottinghaus Company uses this period to evaluate employee capabilities, work habits, and overall performance.

All new and rehired employees work on an introductory basis for the first 90 calendar days after their date of hire. During the introductory period, new employees are eligible for those benefits that are required by law, such as workers' compensation insurance and Social Security. They may also be eligible for other Rottinghaus Company-provided benefits. Employees should read the information for each specific benefits program for the details on eligibility requirements.

EQUAL EMPLOYMENT OPPORTUNITY

Rottinghaus Company is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices.

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at Rottinghaus Company will be based on merit, qualifications and abilities. Rottinghaus Company does not discriminate in employment opportunities or practices on the basis of race, color, religion, sex, national origin, age, disability, sexual orientation, gender identity, genetic information or any other characteristic protected by law.

Rottinghaus Company will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship. This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training.

Any employees with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their immediate supervisor or the Human Resources Department. Employees can raise concerns and make reports without fear of reprisal. Rottinghaus Company prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports. Anyone found to be engaging in any type of unlawful discrimination will be subject to disciplinary action, up to and including termination of employment.

UNLAWFUL HARASSMENT AND SEXUAL HARASSMENT

Rottinghaus Company will not tolerate any form of harassment, including sexual harassment, in the workplace. Rottinghaus Company is committed to providing a work environment that is free from all forms of discrimination and conduct that can be considered harassing, coercive or disruptive, including sexual harassment.

Actions, words, jokes or comments based on an individual's sex, race, color, national origin, age, religion, disability or any other legally protected characteristic will not be tolerated. No employee will be required to tolerate sexual harassment as a condition of employment or fear penalization for objecting

to such harassment. All employees in a supervisory role are required to enforce the policy against sexual harassment by both refraining from and subjecting subordinates to sexual harassment and by acting to end sexual harassment by others. All supervisors are responsible for remedying any such conduct that comes to or should have come to their attention.

Any employee who believes he or she has been subject to any form of harassment should report the alleged act immediately to the in Store Manager, Regional Manager, Operations Manager, Director of Operations or the Human Resources Department. All complaints of harassment or discrimination will be promptly and confidentially investigated. Immediate and appropriate corrective action will be taken if the investigator concludes that harassment or discrimination occurred.

Employees violating this policy will be subject to disciplinary action which could warrant actions up to and including termination. All employees are expected to participate in any workplace investigations. To report a concern or for more information on this, contact the Human Resource Department at (800)990-2774.

ADA POLICY STATEMENT

The Americans with Disabilities Act (ADA) requires employers to reasonably accommodate qualified individuals with disabilities. It is the policy of the Company to comply with all Federal and state laws concerning the employment of persons with disabilities. It is Company policy not to discriminate against qualified individuals with disabilities in regard to application procedures, hiring, advancement, discharge, compensation, training, or other terms, conditions, and privileges of employment.

Rottinghaus Company will reasonably accommodate qualified individuals with a temporary or long-term disability so that they can perform the essential functions of a job. An individual who can be reasonably accommodated for a job, without undue hardship, will be given the same consideration for that position as any other applicant.

All employees are required to comply with safety standards. Applicants who pose a direct threat to the health or safety of other individuals in the workplace, which threat cannot be eliminated by reasonable accommodation, cannot be hired without first consulting with the Human Resource Department. Current employees who pose a direct threat to the health or safety of the other individuals in the workplace will be placed on appropriate leave until an organizational decision has been made in regard to the employee's immediate employment situation. The Human Resources Department is responsible for implementing this policy, including resolution of reasonable accommodation, safety, and undue hardship issues.

The Genetic Information Nondiscrimination Act of 2008 (GINA) prohibits employers and other entities covered by GINA Title II from requesting or requiring genetic information of an individual or family member of the individual, except as specifically allowed by this law. To comply with this law, we are asking that you not provide any genetic information when requesting an accommodation. "Genetic information," as defined by GINA, includes an individual's family medical history, the results of an individual's or family member's genetic tests, the fact that an individual or an individual's family member sought or received genetic services, and genetic information of a fetus carried by an individual or an individual's family member or an embryo lawfully held by an individual or family member receiving assistive reproductive services.

RELIGIOUS ACCOMMODATIONS

Rottinghaus Company respects the religious beliefs and practices of all employees and will make, upon request, an accommodation for such observances when a reasonable accommodation is available that does not create an undue hardship on the company's business.

An employee whose religious beliefs or practices conflicts with his/her job, work schedule, or with the company's policy or practice on dress and appearance, or with other aspects of employment and who seeks an religious accommodation must submit a written request for the accommodation to his/her immediate supervisor. The written request will include the type of religious conflict that exists and the employee's suggested accommodation.

The Human resource Department will evaluate the request and in conjunction with the Directors of Operation, determine whether an accommodation is available which is reasonable and which would not create an undue hardship on the company's business. An accommodation may be a change in job, using paid leave or leave without pay, allowing an exception to the dress and appearance code which does not impact safety or uniform requirements, or for other aspects of employment.

The supervisor and employee will meet to discuss the request and decision on an accommodation. If the employee accepts the proposed religious accommodation, their supervisor will implement the decision. If the employee rejects the proposed accommodation, he/she may send a written appeal to the Human Resource Department.

OPEN DOOR POLICY

Rottinghaus Company fosters an environment that welcomes early identification of opportunities to improve performance; all employees are encouraged to openly discuss suggestions, observations, problems or concerns with any member of management without fear of retaliation.

EMPLOYEE CONCERNS / COMPLAINT PROCEDURE

Rottinghaus Company promotes an atmosphere where employees can talk freely with any member of management. Employees are encouraged to openly discuss with their supervisor any problems so appropriate action may be taken. If the supervisor cannot be of assistance, Human Resources is available for consultation and guidance. Rottinghaus Company is interested in all of our employees' success and happiness with us. We, therefore, welcome the opportunity to help employees.

To foster sound employee-employer relations through communication and reconciliation of work-related problems, Rottinghaus Company provides employees with an established procedure for expressing employment related concerns. In situations where employees feel a complaint is in order, the following steps should be taken:

If an employee believes that he/she has a legitimate work-related complaint, the employee is encouraged to first attempt to resolve the issue(s) through discussions with his/her immediate supervisor.

If the situation is not resolved within five working days from the time the complaint is discussed with the employee's immediate supervisor, barring extenuating circumstances, it should be brought to the attention of the next level supervisor or a representative in the Human Resources Department with written documentation. The Company will attempt to resolve the complaint within a reasonable period of time while preserving the confidentiality and privacy of those involved to the extent feasible.

EMPLOYMENT

NATURE OF EMPLOYMENT

Employment with Rottinghaus Company is voluntarily entered into, and the employee is free to resign at will at any time, with or without cause. Similarly, Rottinghaus Company may terminate the employment relationship at will at any time, with or without notice or cause, so long as there is no violation of applicable Federal or state law. This is not intended to, interfere with, limit or relinquish an employee's right to join with others to work toward altering the terms or conditions of his/her employment, including at-will status.

Policies set forth in this handbook are not intended to create a contract, nor are they to be construed to constitute contractual obligations of any kind or a contract of employment between Rottinghaus Company and any of its employees. The provisions of the handbook have been developed at the discretion of management and, except for its policy of employment-at-will, may be amended or canceled at any time, at Rottinghaus Company's sole discretion.

No representative of Rottinghaus Company has any authority to promise an employee that employment will be permanent or for a definite period of time, or to promise an employee that employment may only be terminated for cause, or to grant employee benefits beyond those set forth in this Employee Handbook, except in a written agreement signed by both the employee and the company owner.

These provisions supersede all existing policies and practices and may not be amended or added to without the express written approval of the company owners.

IMMIGRATION LAW COMPLIANCE

Rottinghaus Company is committed to employing only United States citizens and aliens who are authorized to work in the United States and does not unlawfully discriminate on the basis of citizenship or national origin. In compliance with the Immigration Reform and Control Act of 1986, each new employee, as a condition of employment, must complete the Employment Eligibility Verification Form I-9 and present documentation establishing identity and employment eligibility. Former employees who are rehired must also complete a new I-9 form.

Employees with questions or seeking more information on immigration law issues are encouraged to contact the Human Resources Department. Employees may raise questions or complaints about immigration law compliance without fear of reprisal.

ACCESS TO PERSONNEL FILES

Rottinghaus Company maintains a personnel file on each employee. The personnel file includes such information as the employee's job application, resume, records of training, documentation of performance appraisals and salary increases, and other employment records.

Personnel files are the property of Rottinghaus Company, and access to the information they contain is restricted. Generally, only supervisors and management personnel of Rottinghaus Company who have a legitimate reason to review information in a file are allowed to do so. Any information between supervisor and employee is to remain confidential between the Company and the individual.

Employees who wish to review their own file should contact the Human Resources Department. With reasonable advance notice, employees may review their own personnel files in Rottinghaus Company's offices and in the presence of a member of the Human Resource Department or other individual approved. No employee shall give out employee or managers full names, schedules, addresses or phone numbers to any non-employees for any reason

EMPLOYMENT REFERENCE CHECKS AND CRIMINAL BACKGROUND CHECKS

To ensure that individuals who join Rottinghaus Company are well qualified and have a strong potential to be productive and successful, it is the policy of Rottinghaus Company to check the employment references of all applicants.

Prospective employers, financial institutions, and residential property managers routinely contact employers requesting information on a former or current employee's work history and salary. All such requests of this type shall be referred to and completed by a third party. Rottinghaus Company currently uses The Work Number® to provide automated employment and income verifications. The Work Number is an automated service that provides you with the ability to quickly provide proof of your employment or income. The Work Number can be used anytime, anywhere – available 24 hours a day, 7 days a week.

For Proof of Employment

Step 1) Give the person needing proof of your employment, the verifier, the following information:

- Your Social Security Number: □ □ □ - □ □ - □ □ □ □
- Rottinghaus Company, Inc Employer Code: **15538**
- The Work Number Access Options for Verifiers:
 - Option a) **www.theworknumber.com**
 - Option b) **1-800-367-5690**

To Create a Salary Key

A Salary Key is a six-digit number that allows one-time access to your salary information

Step 1) Access The Work Number either via the Web or telephone:

- a) **www.theworknumber.com**
- b) **1-866-604-6572**

Step 2) Select the Employee option and Login. To Login, have the following information:

- Rottinghaus Company **Employer Code: 15538**
- Your Social Security Number: □ □ □ - □ □ - □ □ □ □
- Your PIN (The last 4 digits of SSN + 4 digit birth year)

Step 3) Select the "Create a Salary Key" option and prepare to write down the six-digit number

Step 4) Give the person needing proof of your employment plus income, the verifier, the following information:

- Your Social Security Number: □ □ □ - □ □ - □ □ □ □
- Rottinghaus Company **Employer Code: 15538**
- Your Salary Key (from Step 3): □ □ □ □ □ □
- The Work Number Access Options for Verifiers:
 - **www.theworknumber.com**
 - **1-800-367-5690**

** Public Service Agencies please visit "Social Services" via the web at **www.theworknumber.com** or call **1-800-660-3399**.*

The Work Number Client Service Center

Monday – Friday; 7:00 a.m. – 8:00 p.m. (CST)

1-866-604-6572 / 1-800-424-0253 (TTY – Deaf)

JOB DESCRIPTION – SANDWICH ARTIST

Sandwich Artist – A Sandwich Artist is an employee who has mastered the skills necessary to create “picture perfect” sub each and every time! You will receive training in the areas of sandwich preparation, food preparation, baking, packaging, and customer service. Our goal is to create beautiful, great-tasting products, made to formula, and served enthusiastically to our customers.

Within 30 days of employment you must be able to perform the following duties in order to qualify for the position of Sandwich Artist. I understand I must be capable of performing the below tasks in order to fulfill the job description as Sandwich Artist.

- Greet every customer with a smile.
- Cut bread.
- Make all sandwiches according to standard formulas.
- Run the cash register and handle money according to Company policies.
- Stock the bain.
- Refill the mayo, mustard, oil, vinegar, parmesan, zesty red, garden Italian, salt & pepper and back-up dressing bottles.
- Pull bread and pull the correct amount of bread and place it in the retarder.
- Wash dishes and pans.
- Clean boards and bain holders.
- Fill the ice machine.
- Clean tables and seats in customer area.
- Clean bathrooms in the proper way.
- Clean sneeze guard.
- Clean front door.
- Change beverage syrups as needed.
- Stock paper products (cups, napkins, etc.).
- Stock chips on chip rack.
- Take needed product from the freezer to cooler so it can be unthawed.
- Bake bread and cookies.
- Prepare needed product items (Seafood, Tuna, Steak, Chicken etc.).
- Do other preparations for onions, green peppers, tomatoes, and bacon.
- Use of tomato and veggie slicer.
- Take out the trash and refill the trash with empty bag.
- Take out recyclables.
- Sweep and mop.
- Mix chemicals correctly (spray bottle, mop bucket).
- Stock straws, lids, condiments, etc. in the soda cabinet area.
- Change out bain and bread pans.
- Clean bain.
- Clean oven, proofer, bread cabinet, microwave.
- Complete cash in and out before and after each shift.
- Change cash register tapes.
- Be able to lift at least 25 pounds.

- Understand and perform all closing procedures completely.
- Know where and how to record employee meals and voids.
- Complete cleaning list posted by management.
- Serve customers in a professional and polite manner.
- Know how to make and ring up party platters and party subs.
- Know how to ring up various coupons.
- Clean parking lots (garbage cans, litter, weeds)

EMPLOYEE TRAINING

All employees are required to participate in basic training. This includes safety training and core sandwich artist training. Upper level positions require additional training based on position level. Employees requesting an accommodation to complete training requirements should contact their supervisor or the Human Resource Office.

Required Training

Safety Training

You deserve to work in an environment that is safe. We need your help to ensure a healthy and safe environment for everyone. Your manager will outline the complete safety procedures during your training. Here are some key elements:

- Knife safety, veggie and tomato slicer safety.
- Do not leave objects or debris on floors or counters.
- Use caution while walking on wet floors. If the wetness is due to the weather, place a "caution wet floor" sign inside the entrance and in front of traffic patterns. If the wetness is due to a spill, clean the area immediately and place the "caution wet floor" sign over the area until it is completely dry and hazard-free.
- Use caution when lifting. Avoid twisting motions. If provided to you, always wear the back support belt when putting away stock, changing sodas or carrying heavy cases. If you are unable to lift something, ask for help.
- Food Safety: Food handler's permit/ Serv safe (where applicable), FIFO. Temperatures, hand washing, cross-contamination, etc.

Training Guide

All employees are trained using the training orientation guide.

Additional Training Opportunities

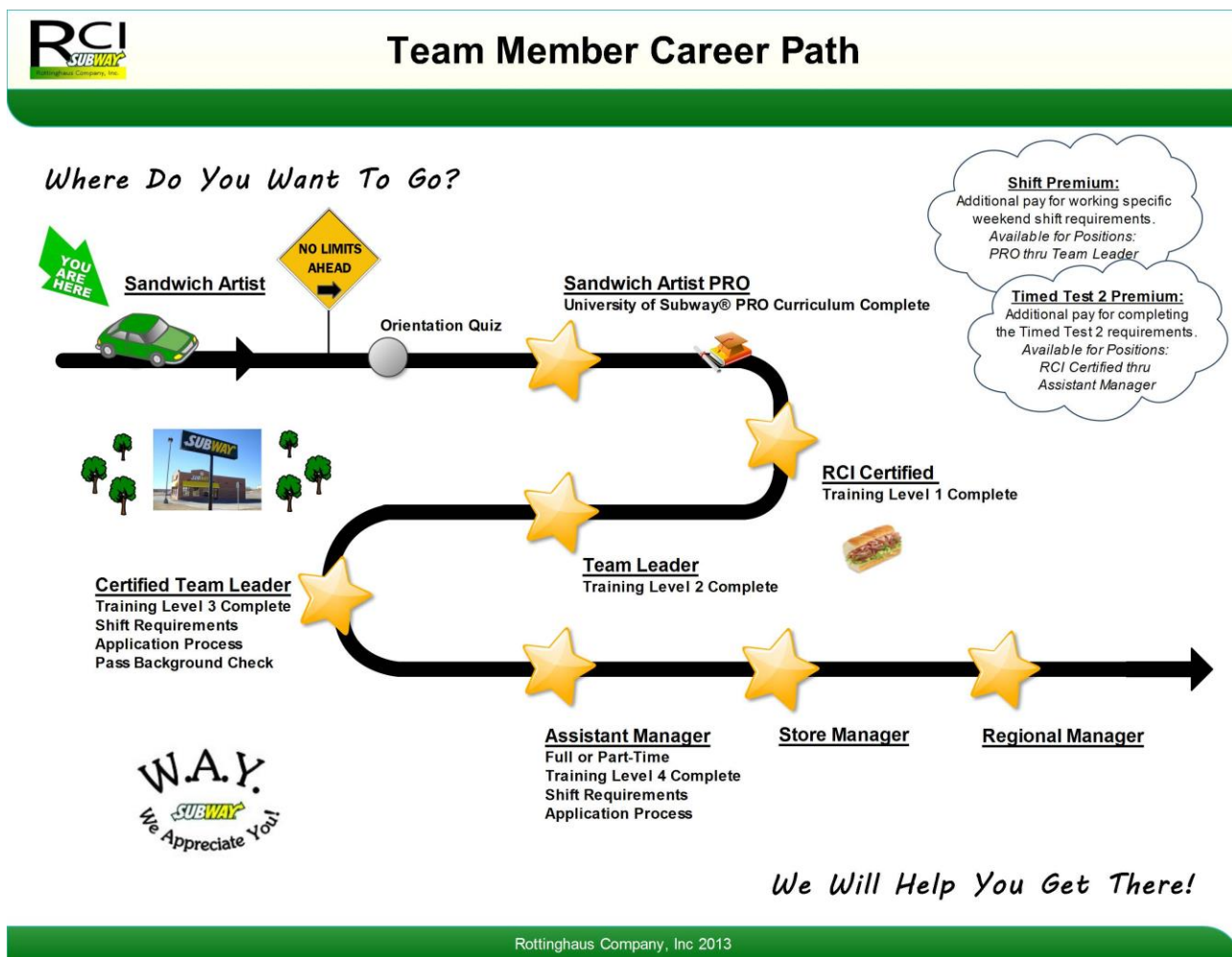
Orientation Quiz

An Orientation quiz is given to each new-hire. The quiz is given to employees after completing new hire paperwork to complete during their orientation period. The quiz is an open book training guide. Employees can use multiple resources to complete the quiz including handbooks, training guides, the Operations Manual and by asking employees or managers for answers. Once an employee completes the quiz, it should be forwarded to the Store Manager to give the Regional Manager to send to the payroll department.

- The Orientation quiz is located inside of the Employee Training Manual
- Upon completion of the Orientation quiz, employees are eligible for pay increase
- A score of 100% is required

Subway University

In addition to on-the-job training, to help employees develop their skills and knowledge of the Subway system, employees are given the opportunity to take paid training courses on-line through Subway University. Employees also have free access to unpaid management course that may be taken outside of work. Management staff is required to complete specific courses.



COMPENSATION

PAYDAYS

Employees are paid on a weekly basis, each Friday. Subway's workweek runs from Wednesday to Tuesday. All hours worked during that period will be paid 10 days following the week ending date. Rottinghaus Company pays employees promptly and accurately from what is reported from the store.

For example, the employee started on Friday, August 10 and worked the following hour for the workweek of August 8 to August 14:

<i>Friday, August 10, 3 hours</i>	<i>Sunday, August 12, 2 hours</i>
<i>Saturday, August 11, 5 hours</i>	<i>Tuesday, August 14, 3 hours</i>

The week ends on Tuesday, August 14. On Friday, August 24, the employee will be paid for the 13 hours he/she worked on those for days for week ending August 14.

All employees of Rottinghaus Company must clock in and out on the computer or electronic timesheet for each shift worked to ensure he/she is paid for his/her hours worked. Employees may not work without clocking-in. Any employee reporting fraudulent hours or found to work off the clock, may be subject to immediate termination. Any questions or concerns regarding wages paid should be directed to the Payroll Department at 1-800-990-2774.

PART-TIME / FULL-TIME CLASSIFICATION

All Sandwich Artists are considered part-time employees. As such, no Sandwich Artist may be scheduled or work more than 29 hours in a pay period. Full-time positions are available to Assistant Managers, Manager Trainees and Salaried Management staff.

OVERTIME

Overtime compensation is paid to all non-exempt employees in accordance with federal and state wage and hour restrictions. Overtime pay is based on actual hours worked. Non-exempt employees are paid time and a half for hours over 40 in one week. Certain State Child Labor Laws may dictate over-time for more than ten hours in a day.

ADMINISTRATIVE PAY CORRECTIONS

Rottinghaus Company takes all reasonable steps to ensure that employees receive the correct amount of pay in each paycheck and that employees are paid promptly on the scheduled payday. In the unlikely event that there is an error in the amount of pay, the employee should promptly bring the discrepancy to the attention of the Payroll Department so that corrections can be made as quickly as possible.

PAY DEDUCTIONS AND SETOFFS

The law requires that Rottinghaus Company make certain deductions from every employee's compensation. Among these are applicable federal, state, and local income taxes. Rottinghaus Company also must deduct Social Security taxes, OASDI on each employee's earnings up to a specified limit that is called the Social Security "wage base." Rottinghaus Company matches the amount of Social Security taxes paid by each employee

Rottinghaus Company offers programs and benefits beyond those required by law. Eligible employees may voluntarily authorize deductions from their paychecks to cover the costs of participation in these programs. Pay setoffs are pay deductions taken by Rottinghaus Company, usually to help pay off a debt or obligation to Rottinghaus Company or others. If you have questions concerning why deductions were made from your paycheck or how they were calculated, contact the payroll department at (608)784-2774.

TIME OFF

EMPLOYMENT CONDITIONS

If I am unable to work any shift already scheduled, I will find my own replacement and I will call in no less than two hours prior to the start of my shift. If I cannot find a replacement I realize that I will be required to furnish a doctor's examination report. I understand that the attendance policy must be adhered to. I understand that if I cannot make my scheduled shift I must call my manager and that I may not text message, e-mail or call-in through any other electronic means.

I realize that when business is slow and work is done I am expected to punch out. I also understand that if the store is busy I am expected to stay beyond my scheduled shift until it is reasonable for me to leave.

I understand I am responsible for checking the schedule and to know when I am scheduled to work and be ready to work on time in full uniform. I understand if I need time off I should write it clearly on the calendar provided. I understand that this does not guarantee that I will get the requested time off. ***I understand that if I do not show or call for a scheduled shift, termination will occur.***

LEAVE OF ABSENCE POLICY

After being absent for three days from work, with a doctor's excuse, employees will automatically be placed on an unpaid leave of absence. Without a doctor's excuse or proper documentation, the absence will be considered a termination of employment. If the absence is medically necessary pregnancy please see the section on Family Medical Leave. All benefits will be handled in compliance with the Family Medical Leave Act.

Employees not eligible for FMLA may request an unpaid personal leave of absence. Personal leaves must be approved by your Regional Manager and Human Resource Department and are subject to business demand/need. Any eligible PTO must be used before a personal leave will be approved. Rottinghaus cannot guarantee employees same position/hours upon return from a personal leave, unless otherwise stated in the request / approval form.

FAMILY MEDICAL LEAVE ACT (FMLA)

Rottinghaus Company acknowledges that from time to time situations occur that require time away from work. It is the policy of Rottinghaus Company to provide eligible employees' unpaid leaves of absence to attend to family and medical needs. Rottinghaus Company intends at all times to comply with federal and state laws regarding family and medical leaves. In the event of a change in regulations, current law will supersede leave policies.

To be eligible for family and medical leave under this policy, an employee must have 12 months of service with the Rottinghaus Company and must have worked at least 1,250 hours during the 12-month period prior to the commencement of the leave. Family/medical leave of absence is defined as an approved absence available to eligible employees for up to 12 weeks of unpaid leave per year for:

- the birth of the employee's child;
- the placement of a child with the employee for adoption or foster care;
- for employee care of a child, spouse, or parent with a serious health condition;
- for a serious health condition which makes the employee unable to perform the essential functions of his or her position.
- or for certain qualifying exigencies arising out of a covered military active duty status, or notification of an impending call or order to active duty status, in support of a contingency operation

Employees may also take up to 26 weeks of leave in a single 12-month period to care for a covered service member recovering from a serious injury or illness incurred in the line of duty on active duty. Eligible employees are entitled to a combined total of up to 26 weeks of all types of FMLA leave during the single 12-month period. Under certain situations spouses both employed by Rottinghaus Company are entitled to a total of 12 weeks of leave combined (rather than 12 weeks each).

Serious Health Condition Defined:

Rottinghaus Company will grant leave for any condition defined as a serious health condition under the federal Family and Medical Leave Act and/or any applicable state law. In general, serious health conditions are conditions which require continuing medical treatment and which cause incapacitation for periods of three days or longer.

Medical leaves may be taken only for “serious health conditions.” These leaves are not intended to cover short term conditions, such as minor illnesses that last only a few days and surgical procedures that typically involve no hospitalization and require only a brief recovery period.

Rottinghaus Company reserves the right to deny requests for a family and medical leave where such a denial would be appropriate and authorized under federal law and any applicable state law.

Conditions for the Taking of Leave:

It is the employees’ responsibility to notify his/her supervisor or the Human Resource Department when FMLA leave is needed. When the need for a leave is foreseeable, an employee is to provide Rottinghaus Company with at least 30 days’ notice. Where the need for the leave is either unforeseeable or where it is impossible for the employee to provide 30 days’ notice, he or she is to provide as much notice as practicable.

The length of any requested leave of absence will be determined initially by Rottinghaus Company based on medical documentation provided by the employee and modified as necessary during the leave. Leaves for the birth or adoption of a child, or a serious health condition affecting the employee, spouse, child or parent will be determined in conjunction with competent medical advice, and in compliance with applicable law.

Procedure:

Consistent with law, and as necessary in the Rottinghaus Company’s estimation, employees are required to use any paid leave to which they are entitled (e.g. paid time off) as part of an approved leave of absence unless the employee is receiving disability payments for that time-period.

Rottinghaus Company will require medical certification to support a claim for leave for an employee's own serious health condition or to care for a seriously ill child, spouse, or parent. For the employee's own medical leave, the certification must include the reason why the employee is unable to perform the essential functions of his/her position. For leave to care for a seriously ill child, spouse, or parent, the certification must include the reason why alternatives to the employee's absence are not possible, such as care by others, and as definite an estimate as possible of the amount of time the employee is needed to provide care. Additional medical opinions may be required consistent with law. The Rottinghaus Company will pay for any such additional opinions.

During the leave, Rottinghaus Company may require an employee to submit, once a month, documentation and other information regarding the current status of the reasons for the leave, including the employee's health care provider's best estimate of the expected return from the leave.

If medically necessary for a serious health condition of the employee or his/her spouse, child, or parent, 12 weeks of the unpaid leave may be taken on an intermittent or reduced leave schedule. Intermittent leaves will only be approved if medically necessary. If Rottinghaus Company is unable to accommodate the intermittent leave due to work restrictions or other reasons, Rottinghaus Company may elect to temporarily transfer the employee to an equivalent position for the duration of the leave.

Rottinghaus Company may require a fitness evaluation or release to return to work from your physician prior to you returning to work.

Benefit Continuation:

Rottinghaus Company will continue an employee's group benefits during the leave, so long as he/she pays the regular contribution toward his/her portion of benefit premiums or if agreed upon beforehand to catch up after the leave is done. But an employee needs to make the necessary arrangements with the human resource representative prior to leave commencement. Failure to make these contributions or agreement will cause discontinuation of the particular benefit coverage in question.

Restoration to Former or Equivalent Position:

Upon return to work from a requested leave, Rottinghaus Company will make every effort to place an employee in his/her former position or a position equivalent to the one held when the employee began the leave, subject to any extenuating circumstances which may occur to the Rottinghaus Company's operations during the leave and which would have affected the employee had he/she not been on leave.

If an employee fails to return from a leave on the agreed upon date, except for reasons beyond his/her control, Rottinghaus Company will assume that the employee resigned and terminate the employee's employment.

Intent to Fully Comply with All State or Local Leave Laws:

To the extent that any state or local law contains leave requirements which differ in any way from those stated in this policy, Rottinghaus Company will satisfy the federal, state, or local requirements.

Please contact the Human Resource Department with any questions – (608) 784-2774, extension 321.

PREGNANCY DISABILITY LEAVE

Rottinghaus Company provides pregnancy disability leaves of absence without pay to eligible employees who are temporarily unable to work due to a disability related to pregnancy, childbirth or related medical conditions. See the *Family Medical Leave Act* above for information and guidelines.

Although, Pregnancy by itself is generally not considered a disability under the Americans with Disabilities Act (ADA); because during pregnancy, some women experience limitations and may be limited in their ability to perform certain tasks, Rottinghaus Company may offer women who are working during pregnancy job accommodations as deemed medically necessary by their physician and that will not pose an undue hardship. To request an accommodation, please contact the Human Resource Department to complete a Job Modification request.

Nursing mothers are allowed reasonable break time to express breast milk for their nursing child for one year after the child's birth.

MILITARY LEAVE

Eligibility: In order to qualify for reemployment rights following military service, you must meet the following five eligibility criteria: you must have left a civilian job; you must have given notice that you were leaving to perform military service; the cumulative period of service must not have exceeded five years (there are exceptions); you must have been released from service under honorable or general conditions; and, you must have reported back to work or applied for reemployment within time constraints prescribed by law. In the event of a change in regulations, current law will supersede leave policies.

Reemployment Procedures: Reinstatement is strictly based on the duration of the uniformed service. In applying for reemployment, you should identify yourself, state that you left employment to perform military service, that you have completed the service and want to be reinstated.

- For periods of military service up to 30 days, you must report back to work at the next regularly scheduled shift on the day following release from the military, safe travel home, and eight hours of rest.
- Following a period of service of 31-180 days, you must apply for reemployment within 14 days following release.
- Following a period of service of 181 days or more, you must apply for reemployment within 90 days after release.

Reemployment Position: Employees returning from military service must be reemployed in the job that they would have attained had they not been absent for military service and with the same seniority, status and pay, as well as other rights and benefits determined by seniority.

Reemployment Entitlements: Following a period of military service, if you meet the eligibility criteria discussed above, you have a number of specific entitlements. You are entitled to prompt reemployment. You are entitled to seniority, seniority-related benefits, status and rate of pay as if you were continuously employed during the military absence. You are entitled to immediate reinstatement of health insurance for you and previously covered dependents, with no waiting period and no exclusion of preexisting conditions, except conditions determined by the Government to be service-connected. You are entitled to training or retraining by your employer if that is necessary to qualify you for the reemployment. If you were disabled while on military duty, or a disability is aggravated by military service, your employer must make reasonable efforts to accommodate the disability. If your period of service was 181 days or more, you are protected from discharge, except for cause, for one year. If the service was for 31-180 days, the period of protection from discharge is 180 days.

Documentation: Following a period of service of 31 days or more, you must provide documentation to which establishes that: your application for reemployment was timely; you have not exceeded the

cumulative 5-year limit; and, the character of your service was "honorable" (e.g., you did not receive a punitive type of discharge). Suggested forms of documentation could include a DD-214, endorsed orders, or a letter from your command.

Effects on Benefits

- Health and Dental Insurance – For the first 30 days or less of service, you pay the normal employee cost, for coverage. USERRA provides that you may elect to continue employer-provided health insurance for a period up to the first 24 months of your military service. If the period of service is 31 days or more, you may be required to pay up to 102 percent of the total premium. COBRA paperwork will be mailed within 30-days to the address on file. Notify the Human Resource Office if you will be deploying in less than 30-days.
- 401k – a returning employee has up to three years times the period of military service (not to exceed five years total) to make missed contributions that could have been made during the leave.
- Vacations – For a period of military service, you may elect to use any Paid Time off (PTO) you have accrued. You are not required to use PTO. You do not accrue PTO during a period of military service. Upon reinstatement to your former position you will be allotted a pro-rated portion of PTO according to your seniority.

BENEFITS

EMPLOYEE BENEFITS

Eligible employees at Rottinghaus Company are provided a wide range of benefits. A number of the programs (such as Social Security, workers' compensation, state disability, and unemployment insurance) cover all employees in the manner prescribed by law.

Benefits eligibility is dependent upon a variety of factors, including employee classification. Your supervisor can identify the programs for which you are eligible. Details of many of these programs can be found elsewhere in the employee handbook. Rottinghaus Company may add or eliminate any benefits offering at any time.

The following benefit programs are available to Sandwich Artist employees:

- 401(k) Savings Plan
- Employee Discounts (20% on party orders)
- Uniform shirts, aprons and hats
- Uniform and Uniform Maintenance

CHECK STUB DETAIL & I-PAY STATEMENTS

Through ADP, our payroll provider, we are able to offer you access to your **check stub detail** 24 hours per day, 7 days a week. In addition, you can make changes to your W-4. Simply type in your changes, print the form, sign it and fax the completed form to the Payroll Department at 1-866-566-4898 for processing.

How to Register:

- Go to the website <https://portal.adp.com>
- Click on “Register Now”. You will be prompted to complete a registration process during which you must enter contact and security information, answer a few security questions and create a password. Your password must be at least eight characters long and must contain at least one letter and either one number or one special character. Also, your password is case sensitive. You will be assigned a system generated User ID. The security questions will be used to verify your identity if you ever forget your user ID or password.
- You will need the Registration Pass Code which is: **rottinghau-001**

Upon completing the registration process, you may access your detailed pay statements anytime at <https://ipay.adp.com>. Employees may access and print their own statements at the store with prior permission from the store manager as long as it does not disrupt business.

REST AND MEAL PERIODS

For each shift, employees and management are allowed one employee meal of a 6" sandwich or soup and one small side (which may include two cookies, one bag of chips, apple or yogurt). Sandwiches include breakfast sandwiches where available. Split shifts are considered two shifts if there is greater than three hours in between shifts and both shifts are three hours or greater. Employees working shifts of seven hours or greater are allowed a foot-long sandwich in place of a 6" sandwich. -- Pizza, hot dogs, pretzels, etc., are not included in the employee meal and must be paid for by all employees including management (double meat, cheese, extra bacon, etc. must also be purchased by the employee).

Each of these meals must be rang in on the POS and consumed on the premises, in the designated area. It cannot be given or sold to another. If the meal is not consumed during the shift it is forfeited. Employee meals do not accumulate. Employees violating this policy may lose their meal privileges. Major or excessive meal policy violations are subject to further disciplinary action up to and possible including termination.

Breaks can be taken as approved by your supervisor and are not guaranteed. Breaks must be taken in the designated break area, never in the customer area. If the activity in the store warrants, breaks may be interrupted. Employees may not lever the store during paid breaks. For any non-related time off where an employee leaves the premises of the store, employees must clock out of the computer for that time; employees may not leave the store during their scheduled work shift without prior authorization from their supervisor. All employees must follow applicable Child Labor Laws concerning break times for employees less than 18 years of age.

Breaks cannot be taken between the hours of 11:30 a.m. – 1:30 p.m. and 5:00 p.m. – 7:00 p.m. Unpaid Breaks must be a minimum of 45 minutes in duration; breaks may not be taken if only one employee is clocked-in, these hours may be expanded by supervising Regional Manager.

SAFETY / WORKERS COMPENSATION

To assist in providing a safe and healthy work environment for employees, customers and visitors, Rottinghaus Company has established a workplace safety program. This program is a top priority for Rottinghaus Company. The Human Resources Department has responsibility for implementing, administering, monitoring, and evaluating the safety program. Its success depends on the alertness and personal commitment of all.

Rottinghaus Company provides information to employees about workplace safety and health issues through regular internal communication channels such as supervisor-employee meetings, bulletin board postings, memos or other written communications.

Each employee is expected to obey safety rules and to exercise caution in all work activities. In the event an outside vendor requests employee assistance in removing or moving product or supplies out of the ordinary scope of the job (e.g. toaster oven), the employee should decline politely to ensure the employees' safety. Employees must immediately report any unsafe condition to the appropriate supervisor. Employees who violate safety standards, who cause hazardous or dangerous situations, who fail to report or, where appropriate, fail to remedy such situations, may be subject to disciplinary action, up to and including termination of employment.

In the case of accidents that result in injury, regardless of how insignificant the injury may appear, employees should immediately notify the Human Resources Department or the appropriate supervisor. Such reports are necessary to comply with laws and initiate insurance and workers' compensation benefits procedures.

1. **Give first aid to the employee. If the injury is severe take the person to the hospital or call an ambulance in the most extreme cases.**
2. Once the injured employee is stabilized the employee's supervisor should call the Human Resource Office at **1(800) 990-2774**. Have the employee send all paperwork or forward all Workers' Compensation bills and information to:

Rottinghaus Company, Attn: Human Resources,
PO BOX 356 ~ Onalaska, WI 54650-0356.

3. The manager **MUST** update the OSHA log. This must be in plain sight for every employee to see. The OSHA log must be kept at the store until the office requests it to be sent in.

Rottinghaus Company's current workers compensation carrier is **Hartford**; in case of an accident you must report the claim to the administrative office by completing the "Worker's Compensation Report of Injury" form located on the website. If you cannot access the website, you may report the claim by calling **1(800) 990-2774**. Report ALL injuries as soon as possible. If you have questions regarding workers compensation, please notify your supervisor or the Human Resource Department.

Manager Responsibilities:

- Be sure first aid is given.
- See that the injured employee is directed to a doctor or hospital, if necessary.
- Give employee billing information form.
- Fill out Accident Investigation Report and Report of Injury.
- Complete Accident Investigation Form as soon as possible.
- Update OSHA Log and Contact your Regional Manager.
- Send any paperwork or bills to the Administrative office in Wisconsin.

- Report any lost time to the Human Resource Department as soon as it occurs.
- If in Missouri, the manager must request a drug screening.

Employee Responsibilities:

- Report the injury immediately to your manager.
- Give the billing information form to the clinic or hospital if you go.
- Give your manager any work restrictions, releases, or bills in a timely manner.

Employees, who have lost time injuries of greater than three (3) days, will be subject to FMLA guidelines and time away from work will be counted towards an FMLA leave of absence.

Return to Work Policy

It is the policy of Rottinghaus Company to retain our valued employees, achieve a safe and timely return of injured or ill employees to the workplace and reduce costs related to disability associated with work-related injuries and illnesses.

If an injured employee is not released to his/her pre-injury duties at the initial appointment, the employee shall request a list of restrictions from his/her physician and submitted it to his/her supervisor. During this transitional period, the employee's supervisor will work with the injured employee to accommodate their restrictions. The employee is required to provide continuous updates of restrictions to their supervisor from their physician. The employee's supervisor will accommodate the injuries to the best of their abilities; however transitional duties may not be available in all circumstances. **Employee injuries and transitional duties MUST be accommodated unless approval is received by the Human Resource Office.**

This transitional period, generally will not exceed 90-days. At the conclusion of the 90-days, the Human Resources Department the employee has temporary or permanent restrictions that result in his/her ability to perform the essential functions of his/her pre-injury position, the provisions of the Americans with Disability Act (ADA) and/or other applicable laws will be applied to determine the suitability for employment.

If an injured employee is released to return to work with no restrictions, the employee shall request a release to return to work from his/her physician. This form should be given to the employee's supervisor immediately following the appointment or within 24-hours.

Physician / Work Comp Approved Appointments

Rottinghaus Company requires that employees are clocked-out for all physician / worker's compensation approved appointments. Compensation for lost-time accidents will be approved and determined by the Worker's Compensation carrier after any applicable waiting periods. Any wages paid by Rottinghaus will be off-set by Worker's Compensation wages. Except in emergency situations, employees must make every attempt to make follow-up appointments during non-scheduled working hours. Employees must notify their supervisor 72-hours prior to any missed shift (due to physician appointments) or as soon as reasonably possible. Failure to do so may result in disciplinary action.

DRUG TESTING POLICY

Any employee injured on the job may be subject to mandatory drug testing. Any employee who refuses to have a drug test is subject to termination. Rottinghaus Company's policy is intended to comply with all state laws governing drug and alcohol testing and is designed to safeguard employee privacy rights to the fullest extent of the law.

Any drug and/or alcohol testing required or requested by Rottinghaus Company Inc. will be conducted by a laboratory licensed by the state. To preserve the confidentiality, Rottinghaus Company Inc. strives to maintain, the employee will only be notified if the test is confirmed positive and, if confirmed positive, what the next step is.

Positive Test Results

If the employee receives notice that the employee's test results were confirmed positive, the employee will be given the opportunity to explain the positive result following the employee's receipt of the test result. In addition, the employee may have the same sample retested at a laboratory of the employee's choice at their cost.

Any employee is found to be under the influence of illegal drugs while at work, will be subject to disciplinary action up to and possibly including termination.

Confidentiality

Rottinghaus Company will make every effort to keep the results of drug tests confidential. Only persons with the need to know will have access to them. Be advised, however, that test results may be used in arbitration, administrative hearings and court cases arising as a result of the employee's drug testing. Also, results will be sent to federal agencies as required by federal law. If the employee is to be referred to a treatment facility for evaluation, the employee's test results will also be made available to the employee's counselor.

Rottinghaus Company Inc. will pay the cost of drug test that it requires or requests employees submit to, including retesting of confirmed positive results. Any additional tests that the employee requests will be paid for by the employee.

ON-THE JOB

CUSTOMER SERVICE

Why is customer service important?

If your customers feel that they do not receive excellent customer service, they may not return to Subway.

Tips for excellent customer service:

1. **Greetings:** Welcome your customers into your store by remembering the "3 Second Rule". A smile along with a greeting (*Welcome to Subway*) will provide a positive atmosphere that will put the customer in a good mood and easier to work with.
2. **Suggestive Selling:** Ask questions like "Is that a foot long?" "Would you like the double meat/double cheese option?" "Will that be a Fresh Value Meal?" "Would you like a fresh baked cookie?"

3. **Helpful Small Talk:** When you are not in a huge rush, make small talk with the customers. Ask about the weather or give positive comments on their sandwich choice. Customers remember a little extra effort and will come back again. However, too much talking can be counter-productive, so keep the customer moving.
4. **Accuracy:** The biggest thing you can do to make a customer happy is to correctly make their order. Try to give the customer your full attention when assembling the sandwich and try to avoid getting distracted and messing up an order. Follow the formulas.
5. **Cleanliness:** “Did you wash your hands?” “Are the tables clean?” “Is the bain clean?” These are some of the questions that should run through your head for each customer. Customers pay attention to the cleanliness of your store. Customers equate the cleanliness with the quality of service.
6. **Speed:** Get the customer through the line quickly, because their time is valuable. Fast and efficient service will prompt for future visits because it won’t be a hassle for them to stop in and enjoy a sandwich.
7. **Listen to the Customer:** Don’t expect the customers to know as much about the products as you. If they seem confused by the menu, please list the ingredients of the sandwiches they may be looking at. Some customers know exactly what they want and allow them a chance to explain their order to you. For most customers ordering Subway sandwiches is not a routine thing so understand that it could take them a moment to formulate their desired order.
8. **Farewell:** Remember to say “Thank you for choosing Subway” to each customer. The farewell is the final opportunity to impress your customer and ensure that he/she returns.

The manner in which you serve your customer is as important as what you serve them. Without customers, there would be no business, and ultimately no jobs.

HOW TO HANDLE AN UPSET CUSTOMER

From time to time you may run into a customer that feels something is not right with their order, the service or the cleanliness of the store. How you handle these customers can help or hinder our business.

Some tips to remember while speaking with an upset customer.

- Get the customer out of the way of other customers.
- Speak in a friendly and concerned manner. Try not to be on the defensive.
- Ask the customer what happened and let them speak without interrupting.
- Repeat to them what you heard to make it clear to both of you.
- APOLOGIZE TO THE CUSTOMER.
- Ask what the customer, what they would like you to do. If possible, do it and make the customer happy.
- If you cannot correct the problem, explain that you are unable to do so in a polite manner.
- Offer to do what you feel is appropriate.
- Thank the customer for bringing this matter to your attention and APOLOGIZE.
- You may be able to turn a negative situation into a positive one for your customer and even help you and your staffs to better serve others.

If this fails or if a customer would like to speak with someone else please give them the following number: **1-800-990-2774**. At this time, it is also helpful to leave a voicemail message explaining the problem. Remember to inform your manager about any customer problems.

HOW TO BE A GREAT SANDWICH ARTIST

- Give great customer service. Smile; be friendly, courteous and professional – even if the customer is not.
- Make super sandwiches.
- Always look your best, come to work in full uniform, neat and clean.
- Be a team player. Be considerate of your co-workers. Cooperate and do your share. Always complete your assigned tasks and help out others when they need it.
- Be honest and adaptable. Admit mistakes and work to correct those areas.
- Follow formulas and always use the correct portions and procedures.
- Keep the store clean and always complete your assigned cleaning list.
- Be accurate. Always be careful when counting money.
- Smile, it makes people feel good and makes customers want to come back.

STORE MUSIC

Rottinghaus Company, Inc. is in the customer service industry and our first priority is to make the customers experience a positive and enjoyable one. Only radio stations approved by your manager and regional manager may be played during business hours. All music must be at an acceptable volume. When installed, Subway radio must be played. I-pods, MP3 players, CD's or other music systems may **not** be played in the store. No employee may listen to a personal music player during hours of operation.

PROVIDING SERVICE TO PERSONS WITH DISABILITIES

You may encounter situations where a customer needs assistance above and beyond the great service you usually provide. The ADA requires that we offer services to meet current ADA requirements. Regardless of laws, providing exceptional service to customers with special needs is just good business. Here are some examples:

- If a disabled customer cannot enter your restaurant because of an obstacle, offer him curbside service.
- If a disabled customer is unable to transact his or her business over the counter, come around the counter and offer service.
- If a customer is sight impaired, courteously read your menu to him or her.
- If a customer is hearing impaired, use a pen and paper to take his or her order and answer any questions.
- Treat customers with service animals courteously and welcome them into your restaurant.
- In any of these instances, service must be offered immediately, pleasantly and at no additional charge.

BEHAVIOR-AT-WORK POLICY

Rottinghaus Company takes the view that courtesy begins at work. If employees and managers treat each other with respect and consideration, they will treat those outside the organization in a proper manner.

If at any time employees feel they are not being treated with respect or courtesy by other employees or any manager, they are urged to file a complaint with the Human Resources Department. A private investigation will be made and corrective action will be taken, if warranted. The following is a non-exhaustive list of some of the employee behaviors that constitute a breach of Rottinghaus Company's behavior-at-work policy, and may result in discipline, up to and including termination:

- behaving in an insubordinate manner toward a supervisor or refusing a supervisor's legitimate work order
- working in a manner that willfully obstructs or hinders other employees from completing their assigned duties
- failing to preserve the safety of both themselves and their fellow workers
- releasing confidential information about the Company, its employees or its customers
- misusing, destroying or damaging Company property
- fighting or violent behavior
- Using foul or inappropriate language including the use of slurs (including all racial, ethnic, religious, and gender-based insults) and slang jargon used to describe sexual acts, body parts and bodily functions, etc.
- Threatening to harm an employee or customer, including implied threats of violence.

PERSONAL APPEARANCE

Dress, grooming, and personal cleanliness standards contribute to the morale of all employees and affect the business image Rottinghaus Company presents to customers and visitors. During business hours or when representing Rottinghaus Company, you are expected to present a clean, neat and tasteful appearance. You should dress and groom yourself according to the requirements of your position and accepted social standards. This is particularly true if your job involves dealing with customers in person.

If your Manager feels your personal appearance is inappropriate, you may be asked to leave the workplace until you are properly dressed or groomed. Under such circumstance, you will not be compensated for the time away from work. Consult your Manager if you have questions as to what constitutes appropriate appearance. A reasonable accommodation may be made when required by law.

Without unduly restricting individual tastes, the following personal appearance and health code guidelines should be followed:

- Rings must not be worn, with the exception of a wedding band.
- A wristwatch and one pair of non-dangling earrings may also be worn in the ears only. Earrings should be ¼ inch or less in diameter.
- Any other visible parts of the body may not be adorned with jewelry. (For example: Facial jewelry, such as eyebrow rings, nose rings, lip rings, tongue studs, neck piercings or any body piercing other than minimal ear piercings must not be worn while on the clock.)

- Tattoo's that may be considered offensive must be covered.
- Fingernails must be short and clean. Nail polish, colored or clear is not allowed.
- Mustaches and beards must be short and neatly trimmed.
- Hair must be clean, neatly combed and restrained.
- Employees must bathe daily and have clean hair, skin, hands, teeth and clothes.
- Plastic gloves must be worn while preparing or handling ALL food products.
- Hands must be washed frequently with soap and water. See hand washing guidelines.
- Excessive make-up and heavy perfume may not be worn.
- Other accessories, such as belts, necklaces, etc. must be tastefully worn and appropriate for the workplace.

DRESS CODE POLICY

Each Rottinghaus Company employee is required to wear authorized Subway attire while working in the store. This includes a Subway visor, shirt, apron, black pants or shorts, and closed flat heeled shoes.

- **Shirts:** *Only official Subway® golf shirt is allowed. All shirts except for those worn for maternity must be tucked in. White or black, t-shirts may be worn underneath.*
- **Aprons:** *Must be black and tied at the waist.*
- **Visor/Hat:** *Only official, black Subway® visor or hat is allowed and must be worn forward.*
- **Pants:** *Only black full length pants are allowed. -- Blue/Black jeans, spandex clothing, jogging pants, leather pants, metallic/shiny colored pants, and pants that contain inserts, studs, color stitching, lacing or other decorations **are not allowed.** Any waiver from this policy must be Subway compliant and approved by the Director of Operations or Human Resource Manager.*
- **Shorts:** *Only official, black Subway® shorts are allowed. Short length must be within one-inch of the knee.*
- **Shoes:** *Dark colored shoes or clean white sneakers must be worn. Open toed shoes, sandals, or high heels are not allowed.*
- **Socks:** *Socks must be worn at all times.*

All black pants, visors, aprons must be true black. Faded pants, visor, aprons must be replaced. Rottinghaus Company management has the discretion to require you to replace faded pants at your expense. Rottinghaus Company provides new, black visors and aprons. You must not wear any Subway uniform item except during working hours. As an employee of Rottinghaus Company, you are required to supply your own black pants.

ATTENDANCE POLICY

Employees are responsible for notifying their supervisor of any absence each day of the absence and advising when he/she will report back to work. If an employee is unable to work any shift already scheduled, they are required to find their own replacement unless they provide a doctor's examination report excusing them from work for a specific period. Employees providing a doctor's excuse must call in at least two hours in advance of their scheduled shift. Because Managers do not have cell phones on at work, text messages are not an acceptable form of notification. If an employee sends a text message to their supervisor of an upcoming absence and a response is not received within fifteen minutes, the employee should assume that it was not received and they must call the store or their manager directly.

Unexcused absences and excessive excused absences are cause for progressive corrective action and may result in termination. Three or more attendance violations in a 12-month period is grounds for termination.

1. An employee is considered absent if he or she is not present for work as scheduled, regardless of cause.
2. Excessive absenteeism is defined as, being absent three times in a 12-month period.
3. Absences resulting from jury duty, approved participation in professional affairs, FMLA and military leave are exceptions to this policy.
4. Excessive tardiness is defined as, arriving more than five minutes late, three or more times in a 12-month period.
5. An employee who is more than five minutes late, regardless of cause, is considered tardy.
6. An employee who is frequently late (less than 5 minutes) may also be considered excessively tardy and subject to disciplinary action.
7. An employee, who does not call in or show for a scheduled shift will have considered to have abandoned their job and will have their employment terminated.
8. **Employees are solely responsible for checking the schedule and reporting to work as scheduled.**
9. Subway holds employee meetings from time to time, as deemed necessary. All employees are expected to attend scheduled employee meetings. Failure to attend a scheduled store meeting will be considered an attendance violation in accordance with the Attendance Policy.

HAND WASHING AND GLOVE USE

A secret shopper came in to a local Subway and observed the employees while ordering and paying for their sandwich. The employees properly washed their hands and put on new gloves before making the secret shopper's sandwich. After the sandwich was made and purchased, the secret shopper observed the person who just handled the money went over and placed the lids back on the containers on the bain without washing their hands. As a result, those lids became contaminated with micro-organisms from the money. When the employees with washed hands and clean gloves go to remove the lids, their hands will be contaminated also; therefore micro-organisms are passed on to the next customer's sandwich. Seeing what just took place, the secret shopper reported this incident to upper management.

Hand Washing is a "MUST"

Your hands touch all kinds of surfaces throughout the day and come in contact with a variety of micro-organisms. Your hands can then transmit these micro-organisms to your customers' sandwiches.

Employees must wash their hands with soap and water. Remember to dry them thoroughly. Hands MUST be washed:

- Before starting work.
- After returning from the restrooms.
- After cleaning assignments such as sweeping, mopping, emptying trash, etc.
- After handling money or any other non-food item.
- After touching hair, face, skin, or clothes.

- In between preparing different food products during food preparation. For example, if you've sliced tomatoes, hands must be washed before slicing meat.

Hand Washing Procedure

- Turn on the faucet and use hot water.
- Use antibacterial soap for hand washing. Work soap into a lather for at least 20 seconds (Or recite the ABC's in your head) and reach all areas of the hand.
- Once you work up a sufficient lather, place hands under the water to wash the soap off.
- Dry hands thoroughly with a clean paper towel. Wiping hands on your pants or apron is NOT an acceptable procedure.

Always wash your hands in front of the customer, even if it means washing your hands twice. For example, you have just washed your hands in the backroom and then you come out front to help a customer, hands must be washed again. Even though nothing has been touched in between, wash your hands again in the hand sink so the customer can observe this action.

DISPOSABLE GLOVES REQUIRED -- Gloves must be worn during all food handling activity

Wearing gloves is an important part of your uniform. Wear gloves at all times while handling food.

Guidelines for disposable gloves:

- ✓ Wash and dry hands each time gloves are changed.
- ✓ Never blow into the gloves before putting them on.
- ✓ Never wash and/or re-use gloves (even if they are not visibly soiled).
- ✓ If gloves become ripped or soiled or if a customer requests they be changed: remove and dispose of gloves, wash hands, and put on new gloves.
- ✓ Dry your hands thoroughly before attempting to put on gloves.
- ✓ Wash hands and put on new gloves after completing any non-food related tasks.
- ✓ If you are making sandwiches on an assembly line, you do not need to change your gloves after every sandwich; provided you remain on the sandwich line and do not perform any non-food related tasks.
- ✓ Latex gloves are not allowed.
- ✓ Wash and dry hands each time gloves are changed and follow the hand-washing guidelines listed earlier.
- ✓ Follow proper sanitary procedures even though gloves are worn. The improper use of gloves can transmit the same micro-organisms as unwashed hands. Be aware of what your hands come in contact with when wearing gloves. Never touch clothes, hair, face, etc. while gloves are on. If this occurs, remove and dispose of the gloves, wash hands, and put new gloves on.
- ✓ Wash hands and put on new gloves in between preparing different food products. For example, once you are done slicing tomatoes, remove and dispose of your gloves, wash your hands, and put on new gloves before preparing meat set-ups.
- ✓ Remove and dispose of gloves before beginning any non-food related tasks, such as:
 - Operating the cash register and handling money
 - Answering the telephone
 - Entering the refrigerator or freezer
 - Completing cleaning assignments

FOOD SAFETY

Food customers eat

All products that we serve must be safe for customers to eat. The Temperature Log is to be used as a tool to prevent bacterial growth which leads to food borne illness. If at any time you question the quality of a product, set it aside and talk to your manager about it.

What is “FIFO”?

FIFO is a term employees should remember when deciding which products to use. FIFO stands for FIRST IN, FIRST OUT that means use older products first. Use the products with the closest expiration date, as long as it is not past the expiration date. Use the Listo pens to label all food products so you serve only the freshest products.

Cross Contamination

Cross Contamination occurs when micro-organisms from one food product come into contact with another food product. Most often, cross contamination happens when cleanliness procedures are ignored.

- Wash hands between tasks.
- Clean and sanitize surfaces used for preparation (e.g. counters, slicer, knives, thermometer, containers), when changing from one food to another.
- Wash fresh produce before slicing.
- Never re-use packaging items (plastic wrap, aluminum foil, sub wrap, sub bags).
- Never mix new product with old or hot product with cold.

The Time and Temperature Principle

Temperature control and time are the key factors to preventing bacterial growth. Food kept in the temperature danger zone for four hours or more causes bacteria to grow and expand. The time period does not have to be consecutive and adds up for each time the food reaches improper temperatures.

***The temperature danger zone is over 41°F and under 140° F.
This is the ideal temperature range for bacteria to reproduce and grow.***

The improper temperature of food is the most common factor associated with food borne illness.

Foods must be kept at the proper temperatures during transport, storage, handling, preparation, display and service.

1. The required temperature range for holding frozen product is 5° F or below. The optimal range is 0° F or below.
2. Thaw product in the refrigerator, never at room temperature.
3. The required temperature range for refrigerated product is 33°- 41° F. The optimal range is 34°- 37° F.
4. Rapidly heat pre-cooked hot product to 165° F. The required temperature range for holding hot product in the food warmer is 140° F to 165° F. The optimal range is 140° F to 155° F.
5. Rapidly cool leftover heated product by placing in shallow pans in the refrigerator.

6. Rapidly re-heat pre-cooked hot products such as chicken, steak, meatballs to 165° F before placing in the food warmer, or before serving if using the pre-portioning method.

Storage

1. Inspect and properly store all products immediately upon receipt.
2. Properly label all products with initials and received and/or prepared dates.
3. Properly cover and/or wrap all products.
4. Store paper products on dry storage shelving. Store food as appropriate on dry storage, cooler or freezer shelving. Never store food products on the floor or near pesticides or cleaning supplies.
5. Date and rotate product to prevent spoilage.

Thermometers -- You are required to record the temperature of food

The Thermocouple thermometer is fast, accurate and easy to use. The reading registers from the tip, so you don't need to insert it into a certain point to get a true reading. You must record temperatures for all products listed on the Food Safety Temperature Recording Log at least twice daily; it is recommended to record temperatures just before lunch and dinner. This will give you a fair overview of the entire day.

If a product temperature is taken and the temperature is **not** within the guidelines for hot or cold products, contact your store manager and follow these steps:

1. Record the temperature on the Food Safety Temperature Action Log along with the date, product, time and initials.
2. Remove product from the front line and determine the possible corrective action, (e.g., place product back into the walk-in cooler, re-heat hot food in microwave, etc.) and record it on the log. *Do not serve product to customers while corrective action is being taken.*
3. Take and record the temperature of the same product 30 minutes later. If the temperature has recovered, indicate that on the action log and notify your store manager.
4. If the product is still outside the acceptable temperature guidelines, then continue to take corrective action.
5. Take and record the product temperature in another 30 minutes (60 minutes later than the initial temperature recording). If the product has still not reached its proper temperature, contact your store manager for further instructions.

HEALTH GUIDELINES - THE BIG 5

There are hundreds of organisms linked to food borne illnesses. Below are some common symptoms of illnesses that can easily be spread by food. If you present with any of the following symptoms, you should tell your manager or person in charge immediately:

- diarrhea
- vomiting
- jaundice
- fever
- discharge from the eyes, nose or mouth
- infected wounds or boils
- sore throat with fever

There are five pathogens, the big five, that are considered highly infectious and virulent are:

- **Salmonella typhi**
- **Shigella spp.**
- **Norovirus**
- **E Coli 0157: H**
- **Hepatitis A Virus**

If you have had or currently have an illness with the “Big Five” or have symptoms of other diseases that can be readily spread via food, you have a serious legal responsibility to report this to your manager.

Managers are required to:

- Recognize diseases transmitted via foods.
- Inform employees of their legal obligation of reporting illnesses.
- Restrict or exclude affected workers.
- Notify your Health Department when an employee is diagnosed with a “Big Five” illness.

Rottinghaus Co. requires the manager or person in charge to prevent food contamination by employees with certain medical conditions through restriction or exclusion from work.

Restriction involves preventing said employee from working with exposed food, clean equipment, utensils and lines, and unwrapped single service/use articles.

Exclusion means the employee is not allowed in any part of the food establishment.

The ADA requires that we accommodate affected individuals by identifying, where reasonably possible, alternative work and responsibilities that fulfill the intent of restriction or exclusion. Although the ADA does not require an employer to keep an employee on-site if there is a risk of transmitting illness to other employees or the public.

DRUG AND ALCOHOL USE

It is Rottinghaus Company's desire to provide a drug-free, healthy, and safe workplace. To promote this goal, employees are required to report to work in appropriate mental and physical condition to perform their jobs in a satisfactory manner.

While on Rottinghaus Company premises and while conducting business-related activities off Rottinghaus Company premises, no employee may use, possess, distribute, sell or be under the influence of alcohol or illegal drugs. The legal use of prescribed drugs is permitted on the job only if it does not impair an employee's ability to perform the essential functions of the job effectively and in a safe manner that does not endanger other individuals in the workplace.

Violations of this policy may lead to disciplinary action, up to and including immediate termination of employment, and/or required participation in a substance abuse rehabilitation or treatment program. Such violations may also have legal consequences.

Under the Drug-Free Workplace Act, an employee who performs work for a government contract or grant must notify Rottinghaus Company of a criminal conviction for drug-related activity occurring in the workplace. The report must be made within five days of the conviction.

Employees with questions on this policy or issues related to drug or alcohol use in the workplace should raise their concerns with their supervisor or the Human Resources Department without fear of reprisal.

CASH HANDLING PROCEDURES

Register / POS

- One person should be put in charge of the register – main person to run the register and ensures cash drops are done hourly.
- Second person to run the register when main person is away.
- No one else should be allowed on the register.
- Each employee will have their own number assigned and those numbers must remain confidential.
- Cash drops should be done hourly and signed by the employee completing the drop– no exceptions, even if it is for only \$1.00
- Readings are to be done every hour
- When doing deposits the total of bills in the till should not exceed \$80.00 or the amount specified by the Regional Manager.
- Only one person is to do deposits, the same person who removes money from the register records the deposit and drops it in the safe.
- Deposits are not to be left on the back table, pinned to back board, under the keyboard, or in/under the cash drawer.
- When dropping a deposit, make sure the envelope is completely in the safe.
- Closing personnel are to count till down to \$80.00 at close or the amount specified by the Regional Manager.
- After all money is dropped at close, register drawer should be left open.
- Take care of giving correct change to customers.
- Employees are required to count back change to each customer.
- No bills over \$20.00 are to be accepted or cashed.

Cash in/out

- Cash ins must be done at the beginning and end of each shift
- Each employee is to do a cash in/out individually (No joint efforts)
- No use of whiteout on any paperwork, deposits or cash in/out. If corrections are needed, cross out the mistake and write correct amount on the line below.
- If cash in/out is \$1.00 +/- the individual must redo.
- Any short/overs of \$5.00 or greater must be called into the manager.
- Cash in /out must be done prior to the start of a scheduled shift.
- Make sure all paperwork is clean, neat and legible.

Cash Box

- The cash-box is to be counted with every cash in/out and kept at the designated amount.
- Closers are to count the box down to the dollar amount required for individual stores.
- Cash box with remaining change is to be placed in designated area.

Safe

- Ensure the safe is properly locked at all times and the security code is kept confidential.

Check Cashing

Personal checks are only accepted at a limited number of stores. Check with your supervisor to verify if your location accepts checks. Business checks are accepted with advance notice.

Check Acceptance Requirements:

- Checks accepted for the amount of the purchase only.
- No two party checks.
- No payroll checks.
- No checks under the number 500.
- No starter or bank counter checks.
- Name and address, must be **pre-printed** on the check.
- Customer phone number and a driver's license number must be listed somewhere on the check.
- Personal checks will only be accepted after the check writer presents a driver's license that is matched to the pre-printed check.
- Do not accept checks from check writers on the bad check list – employee must initial next to the pre-printed name on the check to indicate the name was checked to the bad check list (keep all bad check lists out of customer view). Do not share any information on the bad check listings with customers or any other person.
- Each check must be stamped with the store's "For Deposit Only" stamp.
- It is a violation of company policy to cash employee payroll checks or personal checks in the store and doing so will result in disciplinary action which may include termination.

ROBBERY PREVENTION

Guidelines you should follow to help prevent robberies:

- Turn on all interior and exterior lighting on cloudy, rainy days and always at dusk.
- Night crew should park in well-lit area.
- **Make deposits into safe hourly.**
- Do not accept large bills (\$50.00 or \$100.00).
- Be alert to all customers entering the store. Notice what is going on in the store at all times.
- Give a friendly greeting to everyone. Look customers in the eyes as you are taking their order and carry on a conversation while you are preparing their order.
- The back door should remain locked at all times. All deliveries must be acknowledged at the front counter before authorizing admittance through the back door.
- In stores that have alarm systems, alarms must be activated at close, failure to do will result in disciplinary action up to and could include termination.

What to do in case of a Robbery

Your safety, not the loss of money, is what is important to us. Do not do, or say, anything that will put you or your co-workers in danger.

- Take a deep breath and remain calm. Do not move.
- Listen carefully and obey the commands of the robber. Do not argue with, or resist, the robber in any way.
- Be courteous and tell the robber that you will do what he/she requests.

- When you move, explain what you are doing and why you are moving so your actions cannot be misinterpreted.
- Never make a move to activate an alarm. This could frighten or anger the robber.
- Try to study the robber's characteristics or individual features that he/she has.
- Do not chase or follow the robber.

After a Robbery

- Lock the front door.
- Ask any witnesses to remain in the store.
- Call the police immediately. Then call your supervisor.
- Do not touch anything that the robber might have touched.
- Sit in the dining area and fill out the Ident-a-card supplied.
- Give any witnesses an Ident-a-card and a pen to write their individual observations.
- Do not discuss the robbery with anyone but your supervisor and the police.

KEYS, CREDIT CARDS, AND OTHER RESTRICTED ACCESS ITEMS

In order to provide as much protection as possible for the security of our employees, as well as our property, certain items such as keys to the building and designated rooms will be issued only to those employees whose responsibilities require them.

The designation of what is included under restricted items, depending on the items will be made by the Directors of Operation or Human Resources as appropriate. Examples of such items include: security keys, office or room keys, file, desk and cabinet keys, company sponsored credit cards, policy and procedures manuals and employee handbooks.

All restricted access items will be controlled and issued by the Directors of Operation or Human Resources as appropriate with the exception of policy and procedures manuals and employee handbooks, which are controlled by the Human Resource Department. In most cases, employees will be responsible for signing a form indicating that they have received a particular item and understand that it is the property of the company.

1. Duplication of any restricted access item is prohibited.
2. Loss of any restricted access item should be reported to the issuing party as soon as the loss is discovered. The employee will be charged an appropriate fee for the replacement of any lost restricted access item.
3. Upon leaving employment with Rottinghaus Company for any reason, all restricted access items will be returned on or prior to the employee's last day.

EMPLOYMENT POLICIES

NON-EMPLOYEE POLICY

I understand that only Rottinghaus Company employees are allowed to work in the store at all times. Enlisting the help of friends, family members or others during my shift is against company policy. I understand that I am not allowed to have any individuals not employed by Rottinghaus Company and/or not dressed in uniform behind the bain. I understand that I may not have a non-employee or allow an employee who is not clocked-in in the store after closing.

I understand that I may not allow a non-employee to take a store deposit to the bank or drive for company business. I understand that Rottinghaus Company does not carry insurance coverage for non-employees and that I would be personally liable for any damages or losses incurred by allowing a non-employee to take deposits to the bank or drive for business reasons.

The presence of children in the workplace with the employee parent during the employee's workday is inappropriate and is to be avoided. This policy is established to avoid disruptions in job duties of the employee and co-workers, reduce property liability, and help maintain the company's professional work environment.

CAMERAS IN THE WORKPLACE POLICY

The company prohibits employee possession or use of cameras in the workplace, including camera phones, as a preventative step believed necessary to secure employee privacy, trade secrets and other business information. However, the company reserves the right to install security cameras in work areas for specific business reasons, such as security, theft protection, protection of proprietary information, etc. Taking photographs or video-recording on the premises of the restaurant is not permitted unless authorized by Rottinghaus Company. Any such authorized photography or video-recording of the restaurant may only portray the brand in a positive light. SUBWAY® trademarks may not be used in a manner that DAI determines is scandalous, immoral or satirical.

1. Managers, who have an iPad or other electronic device, may use the device in accordance with the BYOD Policy.
2. Employees are prohibited from bringing cameras or other visual recording devices, including camera phones, into the workplace unless specific advance written authorization has been obtained from the Human Resource Department. Operations and Regional Managers are an exception and may use cameras for work-related purposes.
3. Authorization will be granted when a specific business purpose will be served by the possession or use of such a device and when its use will not violate employee privacy.
4. Authorization may be granted in limited personal circumstances that will be reviewed on a case-by-case basis.
5. Authorization may be revoked at any time for any reason. In such cases, employees will be given a reasonable opportunity to remove the equipment from the premises.
6. Employees should be aware that the company may find it necessary to monitor work areas with security cameras when there is a specific job- or business-related reason to do so. The company will only do so after first ensuring that such action is in compliance with state and federal laws.
7. Employees should not expect privacy in work-related areas as a result of this policy.
8. Privacy of employees in non-work areas will be respected to the extent possible. Reasonable belief of on-site drug use, physical abuse, theft or similar circumstances would be possible exceptions. Legal advice will be sought in advance in such rare cases where non-work area privacy must be compromised.
9. Rottinghaus Company may take photographs at the store or company sponsored events for use in the company newsletter. Any employee who does not want their photo taken should state that at the time the photo is being taken. Employees posing for photographs will assume to be giving consent for their picture to be taken.

Camera Equipped Mobile Devices

This policy serves to define the use of camera-equipped phones and related mobile devices that individuals may bring into the work site. While the company does not wish to unreasonably constrain the use of such devices, the company has a more fundamental responsibility to ensure that they are used in a reasonable manner and to ensure the integrity of proprietary information.

This policy applies to all employees and all visitors while on company premises. Employees who have visitors on company premises are responsible for ensuring that the visitors are made aware of this policy and that such devices are left in visitor vehicles or the reception area.

1. Camera-equipped devices belonging to employees are not permitted on the premises. While at work, employees should plan to keep devices locked in their personal vehicles; camera-equipped devices are not to be kept on Rottinghaus Company property. Operations and Regional Managers are an exception and may use cameras for work-related purposes.
2. Camera-equipped devices issued by the company to designated employees are permitted in most work areas except as designated in number three below.
3. No camera-equipped devices are to be taken into any company restroom.

Employees with questions about this policy should contact the Human Resource Department. If state or federal law requires any modification to this policy the company will re-issue the policy to conform to the applicable law.

VIDEO & AUDIO SURVEILLANCE POLICY

Rottinghaus Company's objective is to provide a work environment that establishes standards for security and privacy. Video and audio surveillance may be used in Rottinghaus Company DBA: Subway's stores to monitor the activity within the store to protect the health, welfare and safety of employees, customer occupants, and assets and property of the Rottinghaus Company. Video and audio surveillance may occur in any of the Rottinghaus Company's stores or property.

Audio surveillance may be used in Rottinghaus Company DBA; Subway's stores to monitor the activity within the store to protect the health, welfare and safety of employees, customer occupants, and assets and property of the Rottinghaus Company in addition to insure customer service standards are followed. Audio surveillance may occur in any of the Rottinghaus Company's stores or property and may occur through the use of phones or video/audio surveillance cameras.

Surveillance will normally not be used in areas where there is an expectation of privacy (i.e. - restrooms), although these areas may be placed under surveillance when it is determined to be the only available option.

Employees with questions about this policy should contact the Human Resource Department. If state law requires any modification to this policy the company will re-issue the policy to conform to state law.

USE OF TRADEMARK

Using any Subway trademarks (including any SUBWAY® equipment) in a manner that degrades, diminishes or detracts from the goodwill associated with the SUBWAY® brand is prohibited. Additionally, trademarks may not be used in a manner that DAI determines is scandalous, immoral or satirical.

USE OF TECHNOLOGY

Employees must participate in annual computer usage training and are responsible for following all guidelines and policies regarding the use of technology as outlined in the Computer Usage and Information Security Handbook. This includes, but is not limited to:

1. Proper usage of the POS System
2. Fax Machine, email, internet and wireless usage in the store through either store or personal equipment.
3. Adherence to the password authentication and management.
4. Social Media policies
5. Confidentiality of information including employee, customer and financial data.

CELLULAR PHONES AND TEXT MESSAGING

Cellular Phones are not permitted during working hours. No employee is allowed to make or accept phone calls (messages through pagers, text messages, emails or access the internet) on cellular phones or other devices while working. All cellular phones and electronic devices must be turned off while on duty. In case of an emergency, the store phone is available for the employee to use. Regional and Operations Managers are an exception to this policy and may use cellular phones for business necessity.

If an employee's preferred method of communication is text messaging, manager's may text employees of an available shift or other mass communication. Texting is not a reliable form of communication and since cell phones must be off while at work; text messages may not be used to communicate time sensitive information, including needing time off, or not being able to work a scheduled shift (see the attendance policy). Text messages may not contain confidential information and may not be used for disciplinary or illegal purposes. Text messages must be sent at reasonable times and may not be sent in the late evening hours or early morning hours.

COMPANY TEXT AND EMAIL COMMUNICATION

Systems may allow employees to receive information via text message or email. This includes, but is not limited to: schedules, employee newsletters, handbook updates, general company announcements, etc. Confidential information will not be sent to an employee's personal email address without prior written authorization. Employees who do not want to receive general information via email or text should contact the Communications Department at (800) 990-2774 ext. 337.

TAPE RECORDING

It is a violation of Rottinghaus Company policy to record conversations with a tape recorder or other recording device unless prior approval is received from your supervisor, a member of upper-level management or unless all parties to the conversation give their consent.

The purpose of this policy is to eliminate an effect on the expression of views that may exist when one person is concerned that his or her conversation with another is being secretly recorded. This concern can inhibit spontaneous and honest dialogue especially when sensitive or confidential matters are being discussed. Violation of this policy will result in disciplinary action, up to and including immediate termination. In the instance that upper management deems it necessary to record a conversation; the party being recorded will be notified that the conversation is being recorded.

TELEPHONE POLICY

No employee, including management is allowed to make or accept personal calls unless it is an emergency or you are calling for a ride home. No employee, including management is allowed to accept collect calls, or permit customers to use the telephone. All employees must know the location of emergency phone numbers.

To ensure effective telephone communications, employees should always use the approved greeting and speak in a courteous and professional manner. Please confirm information received from the caller, and hang up only after the caller has done so. Phone calls may be monitored to ensure customer service standards.

Rottinghaus Company provides the stores with toll-free (800) numbers to contact the Administrative office. Additionally, stores may keep a list of employee phone numbers that other employees may contact for coverage and work-related issues. This list is available to Rottinghaus Company employees only. If you do not want your contact number listed, let your supervisor know. All numbers are for business purposes only and may not be given out.

Anyone found to be in violation of this policy will be subject to disciplinary action. In addition, anyone found to make long-distance calls or accept collect calls will be responsible for reimbursing Rottinghaus Company for those charges.

SOCIAL MEDIA POLICY

Rottinghaus Company Inc. understands that social media can be a fun and rewarding way to share your life and opinions with family, friends and co-workers around the world. However, use of social media also presents certain risks and carries with it certain responsibilities. To assist you in making responsible decisions about your use of social media, we have established these guidelines for appropriate use of social media.

Guidelines

In the rapidly expanding world of electronic communication, *social media* can mean many things. *Social media* includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else's web log or blog, journal or diary, personal web site, social networking, web bulletin board or a chat room, whether or not associated or affiliated with Rottinghaus Company, as well as any other form of electronic communication.

The same principles and guidelines found in Rottinghaus Company policies and three basic beliefs apply to your activities online. Ultimately, you are solely responsible for what you post online. Before creating online content, consider some of the risks and rewards that are involved. Keep in mind that any of your conduct that adversely affects your job performance, the performance of fellow associates or otherwise adversely affects members, customers, suppliers, people who work on behalf of the company or Rottinghaus Company's legitimate business interests may result in disciplinary action up to and including termination.

Know and follow the rules

Carefully read these guidelines, the Ethics Policy, the Security Awareness Policy and the Discrimination & Harassment Policies, and ensure your postings are consistent with these policies. Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence

or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including termination.

Be respectful

Always be fair and courteous to fellow team members, customers, suppliers and people who work on behalf of the company. Also, keep in mind that you are more likely to resolve work-related complaints by speaking directly with your co-workers or by utilizing our Open Door Policy than by posting complaints to a social media outlet. Nevertheless, if you decide to post complaints or criticism, avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, and threatening or intimidating, that disparage customers, team members or suppliers, or that might constitute harassment or bullying. Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion or any other status protected by law or company policy.

Be honest and accurate

Make sure you are always honest and accurate when posting information or news, and if you make a mistake, correct it quickly. Be open about any previous posts you have altered. Remember that the Internet archives almost everything; therefore, even deleted postings can be searched. Never post any information or rumors that you know to be false about Rottinghaus Company, Subway®, team members, customers, suppliers, people or working on behalf of Rottinghaus Company, Subway® or competitors.

Post only appropriate and respectful content

Maintain the confidentiality of company trade secrets and private or confidential information. Trade secrets may include information regarding the development of systems, processes, products, know-how and technology. Do not post internal reports, policies, procedures or other internal business-related confidential communications.

- Respect financial disclosure laws. It is illegal to communicate or give a "tip" on inside information to others so that they may buy or sell stocks or securities. Such online conduct may also violate the Insider Trading Policy.
- Do not create a link from your blog, website or other social networking site to a Company website without identifying yourself as an employee.
- Express only your personal opinions. Never represent yourself as a spokesperson for Rottinghaus Company or Subway®. If Rottinghaus Company or Subway® is a subject of the content you are creating, be clear and open about the fact that you are an employee and make it clear that your views do not represent those of the Company, fellow team members, customers, suppliers or people working on behalf of the Company. If you do publish a blog or post online related to the work you do or subjects associated with Rottinghaus Company or Subway® make it clear that you are not speaking on behalf of the Company. It is best to include a disclaimer such as "The postings on this site are my own and do not necessarily reflect the views of Rottinghaus Company or Subway®."

Using social media at work

Refrain from using social media while on work time or on equipment we provide, unless it is work-related as authorized by your manager or consistent with the Company Equipment Policy. Do

not use Rottinghaus Company email addresses to register on social networks, blogs or other online tools utilized for personal use.

Retaliation is prohibited

Rottinghaus Company prohibits taking negative action against any team member for reporting a possible deviation from this policy or for cooperating in an investigation. Anyone who retaliates against another team member for reporting a possible deviation from this policy or for cooperating in an investigation will be subject to disciplinary action, up to and including termination.

Media contacts

Team Members should not speak to the media on Rottinghaus Company or Subway's behalf. All media inquiries should be directed to the Administrative Office in LaCrosse.

For more information

If you have questions or need further guidance, please contact the Human Resource Department.

EMPLOYEE RELATIONSHIPS & EMPLOYMENT OF RELATIVES

Rottinghaus Company is committed to a policy of employment and advancement based on qualifications and merit and does not discriminate in favor of or in opposition to the employment of relatives. Due to a potential for perceived or actual conflicts, such as favoritism or personal conflicts from outside the work environment which can be carried into the daily working relationship, the following restrictions apply to the hiring or promotion of relatives, partners, those in a dating relationship or members of the same household.

Employees may not supervise family members or members of the same household. Anyone requesting to supervise a family member or member of the same household must notify their direct supervisor, and receive approval from the Ethics Committee before a job offer is made.

Family member is defined as one of the following: relationships by blood -- parent, child, grandparent, grandchild, brother, sister, uncle, aunt, nephew, niece, first cousin; and relationships by marriage, step-parent, stepchild, brother-in-law, sister-in-law, father-in-law, mother-in-law, son-in-law, daughter-in-law, half-brother, half-sister, uncle, aunt, nephew, niece, spouse/partner of any of the above, cohabitating couples/significant others and members of the same household.

A supervisor is defined as having authority where employees can initiate or participate in decisions involving a direct benefit to the relative. Such decisions include but are not limited to hiring, retention, transfer, promotion and wages.

Consenting "romantic" or sexual relationships between a manager and an employee may at some point lead to unhappy complications and significant difficulties for all concerned - the employee, the manager and the Company.

Any such relationship may, therefore, be contrary to the best interests of the Company. Accordingly, the Company strongly discourages such relationships and any conduct (such as dating between a manager and an employee) that is designed or may reasonably be expected to lead to the formation of a "romantic" or sexual relationship.

By its discouragement of romantic and sexual relationships, the Company does not intend to inhibit the social interaction that are or should be an important part or extension of the working environment. If a romantic or sexual relationship between a manager and an employee should develop, it shall be the

responsibility of the manager promptly to disclose the existence of the relationship to their supervisor. The employee may make the disclosure as well, but the burden of doing so shall be upon the manager.

The hiring manager is responsible for ensuring policy compliance. Regional and Operations Managers are responsible for monitoring changes in employee reporting relations after initial hire to ensure compliance with this policy. Employees are responsible for reporting any changes immediately to their supervisor. In the event a relationship between employee and supervisor is found to interfere with the operation of the store(s), the subordinate employee will be transferred to a different location within close proximity, with similar hours.

Any exceptions to this policy must be approved by the Ethics Committee. Written justification for the exception must be submitted prior to any employment offer.

This policy applies to all current and potential employees. Employees who currently supervise a relative will be grandfathered-in, but will not be allowed to supervise or promote future additional relatives.

In addition, and in order for the Company to deal effectively with any potentially adverse consequences such a relationship may have for the working environment, any person who believes that he or she has been adversely affected by such a relationship, notwithstanding its disclosure, is encouraged to make his or her views about the matter known to the Human Resource Manager or member of the Human Resource Department. This policy shall apply without regard to gender and without regard to the sexual orientation of the participants in a relationship of the kind described.

ETHICS POLICY

The highest standards of ethical business conduct are required of all employees in performance of their responsibilities. Intent of this policy is that each employee will conduct Company business with integrity and comply with all applicable laws in a manner that excludes considerations of personal advantage or gain.

Employees will not engage in conduct or activity that may raise questions as to the company's honesty, impartiality or reputation or otherwise cause embarrassment to the company. Employees will avoid any action, whether or not specifically prohibited in the personnel policies, which might result in or reasonably be expected to create an appearance of:

- Using their position for private gain.
- Giving preferential treatment to any person or entity.
- Losing impartiality.
- Adversely affecting the confidence of employees or customers in the integrity of the company.

Conflicts of Interest

Employees must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, you may be faced with situations where the business actions you take on behalf of Rottinghaus Company may conflict with your own personal or family interests because of the course of action that is best for you personally may not also be the best course of action for Rottinghaus Company. Employees owe a duty to Rottinghaus to advance its legitimate interests when the opportunity to do so arises. Employees must never use Rottinghaus Company property or information for personal gain.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict of interest question should seek advice from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their supervisor or the Human Resource Department. Below are some other ways in which conflicts of interest could arise:

- Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with Rottinghaus Company.
- Hiring or supervising family members or closely related persons (see policy on hiring of relatives).
- Owning or having a substantial interest in a competitor, supplier or contractor.
- Soliciting for an outside business, while at work, with co-workers or subordinates that you have a personal interest, financial interest or potential gain in.
- Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all employees.

Gifts, Favors and Payments by the Company

Giving payments, free product or other compensation to or for the benefit of yourself (or family members) are contrary to Company policy and not allowed. Rottinghaus Company is committed to competing solely on a merit of our products and services. Employees should avoid any actions that create a perception that favorable treatment of outside entities was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of Rottinghaus Company, or would cause embarrassment or reflect negatively on the company reputation.

Accepting Business Courtesies

Most business courtesies offered to us in the course of our employment are offered because of our positions at Rottinghaus Company. We should not feel any entitlement to accept and keep a business courtesy. Employees may accept unsolicited business courtesies that promote successful working relationships and good will with other companies that Rottinghaus Company maintains or may establish a business relationship with.

Employees who can influence the allocation of business, who create specifications that result in the placement of business or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company's reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a supplier when Rottinghaus Company is involved in choosing or reconfirming a supplier or under circumstances that would create an impression that offering courtesies is the way to obtain business.

Employees may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that:

- They are not inappropriately lavish or excessive.
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.

- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future.
- The employee accepting the business courtesy would not feel uncomfortable discussing the courtesy with his or her manager or co-worker or having the courtesies known by the public.

Employees may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices of the marketplace, including: Flowers, fruit baskets and other modest presents that commemorate a special occasion; or gifts of nominal value, such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items).

Generally, employees may not accept compensation, honoraria or money of any amount from entities with whom Rottinghaus Company does or may do business. Tangible gifts (including tickets to a sporting or entertainment event) that have a market value greater than \$100 may not be accepted unless approval is obtained from the Ethics Committee.

Employees with questions about accepting business courtesies should talk to their managers or the Human Resource Department.

Promote Substance Over Form

At times, we are all faced with decisions we would rather not have to make and issues we would prefer to avoid. Sometimes, we hope that if we avoid confronting a problem, it will simply go away. At Rottinghaus Company, we must have the courage to tackle the tough decisions and make difficult choices; secure in the knowledge that Rottinghaus Company is committed to doing the right thing. At times this will mean doing more than simply what the law requires. Merely because we can pursue a course of action does not mean we should do so.

Although company policies and procedures can not address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct.

Accountability

Each of us is responsible for knowing and adhering to the values and standards set forth in this policy and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations, we must contact the Human Resource Department.

Rottinghaus Company takes seriously the standards set forth and violations are cause for disciplinary action up to and including termination of employment.

Confidential and Proprietary Information

Integral to Rottinghaus Company's business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses, employee information or nonpublic information about other companies, including current or potential supplier and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

Build Trust and Credibility

The success of our business is dependent on the trust and confidence we earn from our employees and customers. We gain credibility by adhering to our commitments, displaying honesty and integrity and

reaching company goals solely through honorable conduct. It is easy to say what we must do, but the proof is in our actions. Ultimately, we will be judged on what we do.

When considering any action, it is wise to ask: will this build trust and credibility for Rottinghaus Company? Will it help create a working environment in which Rottinghaus Company can succeed over the long term? Is the commitment I am making one I can follow through with? The only way we will maximize trust and credibility is by answering “yes” to those questions and by working every day to build our trust and credibility.

Respect for the Individual

We all deserve to work in an environment where we are treated with dignity and respect. Rottinghaus Company’s committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone’s talents go to waste.

Rottinghaus Company’s an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her manager or to human resources.

Create a Culture of Open and Honest Communication

At Rottinghaus Company everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

Rottinghaus Company will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

Set Tone at the Top

Management has the added responsibility for demonstrating, through their actions, the importance of this. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Again, ultimately, our actions are what matters.

To make our policy work, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees’ ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At Rottinghaus Company, we want the ethics dialogue to become a natural part of daily work.

Uphold the Law

Rottinghaus Company’s commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or Rottinghaus Company policy, we should seek the advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations.

Proprietary Information

It is important that we respect the property rights of others. We will not acquire or seek to acquire improper means of a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

Selective Disclosure

We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material nonpublic information with respect to Rottinghaus Company, its securities, business operations, plans, financial condition, results of operations or any development plan.

Health and Safety

Rottinghaus Company is dedicated to maintaining a healthy environment. A safety manual has been designed to educate you on safety in the workplace. If you do not have a copy of this manual, please see your Human Resource Department.

Solicitation

Solicitation that benefits the employee or an employee's immediate family member is not allowed in the work place unless approved by the Ethics Committee. Due to the level of authority supervisors have, subordinates may feel intimidated to purchase or participate in services solely due to the fact that it is being presented by their supervisor; therefore, supervisors or their immediate families may not solicit the supervisor's peers or employees either in the work place outside of work.

Solicitation for charity groups, non-profit groups (cancer walk, Girl Scout cookies) or fundraising is allowed with approval by the area Operations Manager.

Accurate Public Disclosures

Rottinghaus Company will make certain that all disclosures made in financial reports and public documents are full, fair, accurate, timely and understandable. This obligation applies to all employees, including all financial executives, with any responsibility for the preparation for such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Employees should inform Management and the Human Resource Department if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

Corporate Recordkeeping

We create, retain and dispose of our company records as part of our normal course of business in compliance with all Rottinghaus Company policies and guidelines, as well as all regulatory and legal requirements.

All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books in accordance with Rottinghaus Company's and other applicable accounting principles.

We must not improperly influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of Rottinghaus Company books, records, processes or internal controls.

Compliance

Any violation of this policy will subject the employee to disciplinary action or immediate discharge. Any employee having knowledge of any violation of the policy shall promptly report such violation to the appropriate level of management. Each Operations Manager is responsible for compliance in their area of responsibility. When questions arise concerning any aspect of this policy, contact Human Resources.

The Human Resource Department is responsible for providing policy guidance and issuing procedures to assist employees in complying with expectations of ethical business conduct and uncompromising values. This policy constitutes the standards of ethical business conduct required of all employees. All management is responsible for supporting their implementation and monitoring compliance.

SMOKING POLICY

Rottinghaus Company strives to provide a safe and healthy work environment for all employees. There is no smoking or use of tobacco products while clocked-in, in the store, on company property or in any customer's view while in uniform. There is also no smoking allowed on company property or within a twenty-five feet of the store, adjoining businesses and landlords (state or county law may increase this). Additionally, no smoking is allowed during paid breaks. See the policy on Rest and Meal Periods.

This policy includes both nicotine and non-nicotine products. Non-nicotine products include, but are not limited to electronic cigarettes, vapor cigarettes, and herbal cigarettes. Employees must also keep tobacco (including non-nicotine) products out of employee and customer view.

Rottinghaus Company complies with State and Federal regulations regarding underage smoking.

Rottinghaus Company insists that all employees are in compliance with ALL state and Federal laws; it is unlawful for minors (under the age of 18) to possess cigarettes or tobacco products. All states have laws regarding underage smoking (three examples of state laws are listed below). Employees in violation of smoking laws are subject to disciplinary action up to and possibly including termination.

- Kansas Ordinance No. 96-24 Section (2) states, "It shall be unlawful for any person who is under 18 years of age to possess or attempt to possess cigarettes or tobacco products."
- Missouri legislation states that "it is illegal for individuals under the age of 18 to purchase, attempt to purchase or possess tobacco products."
- Wisconsin law states, "It is illegal for persons under the age of 18 to possess cigarettes or tobacco products . . ."

WEAPONS AT WORK POLICY

Rottinghaus Company strictly prohibits weapons on Rottinghaus Company property and premises (except as required by law). Employees in violation of this policy will be subject to immediate termination. This includes both owned and leased locations.

HUMAN RESOURCE & PAYROLL CONFIDENTIALITY

The Human Resource and Payroll Departments of Rottinghaus Company keep all personnel files, payroll, and human resource information confidential. Managers should refrain from discussing confidential company business with anyone who does not have a legitimate need to know the information. Only select individuals are able to view the information for legitimate business reasons. (*See Access to Personnel Files in Handbook*).

As a Manager it is important that manager and employee information is kept confidential. All information regarding the individual whether written or spoken must be kept confidential and not shared with others as gossip. Failure to do so could place the Company in legal jeopardy.

CHILD LABOR LAWS

Rottinghaus Company follows all child labor laws. Employees are required to follow ALL state and federal child labor laws. Rottinghaus Company prohibits the hiring of anyone under 16-years of age due to child labor restrictions. Employees may be required to provide proof of age. In addition, each state has guidelines and hour limitations minors must adhere to. Anyone found to be out of compliance with applicable child labor laws will be subject to disciplinary action up to and including termination. The Human Resource and/or Payroll office can provide you with information on child labor laws for your state.

Although Child Labor Laws vary by state, under Federal Law, no one under the age of 18 may operate power driven equipment (box crushers, trash compactors, etc.) or may drive for work related reasons.

LEAVING ROTTINGHAUS COMPANY INC.

RETURN OF PROPERTY

Employees are responsible for items issued to them by Rottinghaus Company or in their possession or control; the following list includes but is not limited to:

- Keys
- Uniforms

Employees, on or before, their last day of work must return ALL Rottinghaus Company property. Where permitted by applicable laws, Rottinghaus Company may withhold from the employee's check or final paycheck the cost of any items that are not returned when required. Rottinghaus Company may also take all action deemed appropriate to recover or protect its property.

TEMPORARY RELEASE FROM WORK

When a serious offense or situation has occurred where an employee has not followed policy or procedure, the employee[s] involved may be removed from any scheduled shift[s] until the Store Manager has been able to discuss the situation with his/her Regional Manager and/or a meeting has been set up with the Human Resource Department. The Store Manager will then inform the employee[s] what the resolution or the outcome of the decision that has been made.

EMPLOYMENT TERMINATIONS

Termination of employment is an inevitable part of personnel activity within any organization, and many of the reasons for termination are routine. Below are examples of some of the most common circumstances under which employment is terminated:

- Resignation - voluntary employment termination initiated by an employee.
- Discharge - involuntary employment termination initiated by the organization.

Since employment with Rottinghaus Company is based on mutual consent, both the employee and Rottinghaus Company have the right to terminate employment at will, with or without cause, at any time. As an employee of Rottinghaus Company, you understand that your last paycheck upon quitting or termination will be issued on the next scheduled payday unless otherwise required by law. Termination without written notice can occur in some instances. The list includes, but is not limited to the following:

- Stealing the store's or fellow employees' property.
- Falsifying or reporting fraudulent hours or other information.
- Verbal or physical abuse of a customer or staff member (including the use of foul language).
- Intentionally destroying or damaging company property.
- Working under the influence of, or selling drugs or alcohol on store premises, including smoking in the store.
- Closing the store early without expressed consent from your Regional Manager.
- Leaving your shift early without approval is considered job abandonment and a voluntary quit.
- Failure to make hourly deposits to the safe.
- Giving unauthorized food or drinks to customers, friends or family members.
- Failure to activate security alarm system or lock the safe.
- Giving another employee or non-employee your safe combination, POS password or store key.
- Inappropriate and/or explicit sexual or discriminatory behavior.
- Falsifying documents.
- An employee found to be stealing from an associated business (i.e. Wal-Mart, strip mall, convenience store or other shared facility) and/or banned from an associated business will not be eligible to work at any Rottinghaus Company location.

REHIRE POLICY

Rottinghaus Company takes the view that employees may seek other opportunities throughout their employment career to advance their experiences as well as better themselves. Upon leaving Rottinghaus Company, we would appreciate a written resignation as well as a sufficient notice so there is ample time to find a replacement.

If in the future, a previous employee applies for a position within the Rottinghaus Company, a "Rehire Request & Agreement Form" must be completed. This agreement must be signed by the applicant, the store manager, the Regional Manager, and the Operational Manager. Rehire checks must be submitted via email to the Human Resource Department by the area Regional Manager prior to any acceptance or offer of a position.

If the Human Resource Department and/or Operations Manager disagree with the rehire due to previous performance issues or the nature of the departure, The Director of Operations or Human Resource Manager have the right to veto the rehire. In order to change a rehire status, an applicant may file a written appeal to the Human Resource Department stating in their view why the status should be reversed. Upon receiving this appeal, Rottinghaus' Review Committee will meet and discuss the documents and investigate the issue(s) brought to our attention. A written reply will be sent back to the applicant informing them of the concluded decision.

WAL-MART, LEASED LOCATIONS AND OTHER ASSOCIATED BUSINESSES

Employees working in side of a Wal-Mart or other associated business must also follow the policies of the property owner. Some examples are listed below.

- Merchandise may not be brought into a Subway Store unless it is paid for, a receipt must be kept with the merchandise at all times and all purchases are subject to search.
- Profanity is not allowed and all Subway employees must conduct themselves in a professional manner.
- Parking rules are per landlord and / or Wal-Mart Manager.
- Employees working in a Wal-Mart location should understand emergency codes (e.g. code red, blue, etc.) as well as evacuation procedures.
- Smoking policies as set by the landlord, in addition to Rottinghaus Company policies must be followed. For example, Wal-Mart does not allow smoking within 50 feet of their building, sidewalks, etc.

DRIVER SAFETY POLICY

The safety and well-being of our employees is of critical importance to the organization. We therefore each have a responsibility to not only protect ourselves when on the road but also should do our part to protect those around us. Employees that drive on company business at any time will be expected to consistently apply / follow all the procedures below.

1. All employees are expected to wear seat belts at all times while in a moving vehicle being used for company business, whether they are the driver or the passenger.
2. Use of handheld cell phones, whether personal or business-owned, while behind the wheel of a moving vehicle being used on company business is strictly prohibited. Employees may not text message, email or use any other form of electronic communicate while driving.
3. Although use of cell phones under any circumstances is strongly discouraged while driving, the use of hands-free technology may be warranted in unusual or emergency circumstances (Regional and Operations Managers only, all others may not use cell phones or hands-free devices while driving).
4. Engaging in other distracting activities including, but not limited to, eating, putting on makeup, reading or changing radio stations or music, is also strongly discouraged while driving, even when in slow-moving traffic.
5. Use of alcohol, drugs or other substances, including certain over-the-counter cold or allergy medications that in any way impair driving ability, is prohibited.
6. All employees are expected to follow all driving laws and safety rules such as adherence to posted speed limits and directional signs, use of turn signals and avoidance of confrontational or offensive behavior while driving.
7. Employees should never allow anyone to ride in any part of the vehicle not specifically intended for passenger use and/or any seat that does not include a working seat belt. Employees also may not have unauthorized passengers in their vehicle while driving for business purposes.

8. Employees must promptly report any accidents to local law enforcement as well as to the Company.
9. Anyone driving for business purposes must have a valid driver's license and proof of insurance for the vehicle being driven on file in the WI office.
10. Motor vehicle records will be checked upon hire and every six-months thereafter for delivery drivers.
11. Delivery drivers must maintain a clean driving record with no more than one-minor traffic violation within a two-year period and no major traffic violations.
12. A certificate of insurance must be provided to the WI Office annual. Delivery drivers are required to have a minimum of \$500,000/\$500,000/\$500,000 or 1,000,000 combined single coverage.
13. Employees under the age of 18 may not drive a vehicle for company business under any circumstance and delivery drivers must be at least 21 years of age.
14. A Class D or commercial auto license is required for all delivery drivers.

I agree to abide by the above and understand that failure to adhere to these procedures may result in disciplinary action. I agree to supply my supervisor with any changes in my driving or insurance status, including loss of driving privileges or auto insurance.

LOSS OR SUSPENSION/RESTRICTION OF DRIVER'S LICENSE

I. Policy

This policy specifically addresses employees who occupy positions that require a valid driver's license and/or special driving certification (commercial driver's license) as a condition of employment.

II. Loss or Suspension/Restriction of Driver's License

An employee who has been charged with a violation of statutes that affects his/her driver's license or who has his/her driving privileges suspended, revoked or barred for violating such statutes, including but not limited to operating a vehicle while intoxicated, vehicular homicide or habitual violation, shall not be permitted to operate a vehicle on behalf of the company for a period of one-year or until the time when the Department of Transportation or the appropriate state licensing agency restores the employee's ability to drive, whichever is greater. The suspension of company driving privileges shall take effect upon the company's notice of the charge against the employee.

III. Termination of Employment for Failure to Maintain a Driver's License

An employee whose job classification or position requires the possession and maintenance of a driver's license and/or any required special driving certification in order to perform the essential functions of the job and who subsequently has his or her license revoked, rescinded, suspended or the renewal denied, may be, after the exhaustion of all administrative contested case proceedings before the licensing agency, terminated from employment for failure to maintain the necessary qualification required for that position.

IV. Appeal Process

Once an employee successfully has his or her driving privileges reinstated, the employee must appeal to the Company's Review Board to be reinstated to his or her position. The Review Board will review appeals from employees on an individual basis to determine reinstatement eligibility. If the court does not suspend the license, the Review Board reserves the right, in accordance with company policies, to determine if the behavior of the employee is such that he or she should not be allowed to operate a vehicle on behalf of the Company.

ADDENDUM - CERTIFIED TEAM LEADER JOB DESCRIPTION

The Certified Team Leader is responsible for assisting the Manager with daily and weekly paperwork, maintaining customer service standards and store operations when the Manager or Assistant Manager are not present. The Certified Team Leader works with new employees on in-store training, acclimating new employees to the store and company processes.

The Certified Team Leader must possess strong interpersonal and communications skills and must be able to work with a diverse workforce. The Certified Team Leader must also fulfill the Team Leader & Sandwich Artist job description / requirements as stated in the Rottinghaus Company handbook.

Training Requirements

To be promoted to a Certified Team Leader employees must retake and pass timed test one and successfully complete all necessary training requirements through Training Level 3. They must also be able to do daily and weekly paperwork (coupon log, spot checks, post close reconciliation, Tuesday paperwork) know how to successfully make a food order for the store (4 week period), complete the Food order build while maintaining food cost and able to place food order on-line. Additionally, they must have proven success working with employees in a team environment.

Essential Duties and Responsibilities

Store Operations

- Ability to use the scheduler or other approved scheduling system.
- Monitor productivity and inform the manager when productivity is low.
- Complete weekly inventory and paperwork once every four-weeks (or more as requested).
- Complete coupon log, spot checks and post close reconciliation as requested by the Store Manager
- Complete and place the food order, while maintaining food cost, once every six-week (or more as requested).
- Demonstrate the ability to successfully open the store.
- Demonstrate the ability to successfully close the store.
- Ability to bake bread according to Subway® standards.
- Proven record of following compliance standards as required by Subway®
- Assist in displaying and explaining the new POP material.

New Team Member Training

- Conduct on-the-job training for new employees.
- Monitor trainees to measure progress, update training log and training requirements.
- Report on progress of employees under guidance during training periods.
- Assist employees with problems concerning "how to" perform specific tasks related to their position.
- Develop positive working relationship with employees they are training to help adapt them to the stores culture.

Supervisory Responsibilities

- Carry out supervisory responsibilities in accordance with new hire training.
- Assist Store Manager and Assistant Manager with enforcing store and company policies.
- Consult with the Store Manager on employee issues, concerns
- Assist the Store Manager with staffing needs during shifts worked; including coverage for no call no shows and call-ins.

Job Specifications

Knowledge, skills and abilities required for competent performance in the job:

- Proficient understanding of Subway policies and procedures.
- Leadership skills to effectively direct trainees and other employees and ability to properly evaluate comprehension and application of subject material.

- This position requires initiative, motivation, creativity and ability to understand many areas of Store Operations.
- The training area is one of constant change. This position must be able to react positively to these developments.
- Ability to communicate professionally with all levels of management, employees and customers.
- Excellent communication and interpersonal skills are necessary to produce and deliver quality training.

Additional Requirements

- The Certified Team Leader must have flexible availability. Includes opening and closing during weekdays and weekends, and helping cover employee shifts.
 - Required to work one weekend shift per week **and** one opening or closing shift per week.
- Ability to functions independently in a multi-task environment, as well as part of a team.
- Ability to follow safety procedures.
- Strong planning and organizational skills.
- Any other duties as assigned by the Store Manager or Assistant Manager.

Essential Physical Requirements:

- Ability to process information/merchandise through POS Register system.
- Ability to communicate with employees and customers.
- Ability to read, count, and write to accurately complete all documentation.
- Ability to freely access all areas of the store.
- Ability to operate and use all equipment necessary.
- Ability lift up to 50 pounds.
- Ability to work varied hours/days as business dictates.

NOTES

AUDIO ACKNOWLEDGMENT & CONSENT

I, _____, hereby acknowledge my awareness of, and give my written consent to, the fact that my employer Rottinghaus Company, Inc. d/b/a Subway (hereinafter referred to as "employer") may at any time record telephone calls made from telephones owned and/or provided by my employer in the workplace (which is defined as any and all premises owned, operated, leased, and/or controlled by my employer and locations contemporaneous thereto). I acknowledge and understand that I have no expectation of privacy in any telephone conversation(s) in which I engage while at the workplace, whether or not such conversations occur during my work hours. I understand that any telephone calls made from the workplace may be recorded, that such recording may be ongoing, and that such recordings may be reviewed at any time by authorized agents, representatives, supervisors, owners, directors, insurers, or legal counsel of my employer. Such recordings may be used for quality assurance purposes. To the extent such recordings evidence violations of the law and/or the rules and regulations of my employer, the recordings may be used as the basis for workplace discipline up to, and including, termination. To the extent such recordings evidence criminal activity; the recordings may be provided to and shared with relevant law enforcement authorities.

I further acknowledge my awareness that my employer at any time may record, audio and/or visually, the workplace through closed-circuit and/or surveillance cameras. I hereby provide my consent to being visually and/or audio recorded in the workplace. I acknowledge and understand that I have no expectation of privacy in any actions and/or conversation(s) in which I engage while at the workplace, whether or not such actions or conversation(s) occur during my work hours. I understand that such recording may be ongoing and that such recordings may be reviewed at any time by authorized agents, representatives, supervisors, owners, directors, insurers, or legal counsel of my employer. Such recordings may be used for quality assurance purposes. To the extent such recordings evidence violations of the law and/or the rules and regulations of my employer, the recordings may be used as the basis for workplace discipline up to, and including, termination. To the extent such recordings evidence criminal activity; the recordings may be provided to and shared with relevant law enforcement authorities.

I have read this acknowledgment and consent, and agree to be bound by its terms. I acknowledge that this document supersedes any contrary or conflicting oral statements, regardless of when such oral statements are made. I understand that it is my responsibility to understand and abide by the terms of this document. Therefore, I may and should ask my supervisor and/or authorized personnel to clarify or explain any information in this document that I do not understand. By signing this document, I acknowledge that I understand its contents and terms.

This authorization is to remain in effect until revoked by me in writing, revised and/or supplemented in writing by my employer, or until I terminate my employment with my employer.

[Print name]

Dated: _____

Signature

[Signature of parent or guardian if employee is under the age of 18]

