



# MEMO

To: All Employees  
From: Sarah Corrigan  
Date: 5/29/20  
Re: **June 1, 2020: Return to Regular Attendance Policy**

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As the world stabilizes from the Coronavirus Pandemic (“Pandemic” and/or “COVID-19”), stay at home orders are lifted and the states in which we operate outline protocols for re-opening, **we will revert to our regular Attendance Policy to manage time off taken by employees starting June 1, 2020.**

**A. Unpaid COVID-19 leave.** We will apply available Paid Time Off (PTO) to all absences starting June 1, 2020 unless OMG, Inc. (“OMG” and/or “the Company”) is required to permit unpaid leave by law. We still will permit employees to take unpaid leave without penalty *if they have exhausted their available paid leave* in the following circumstances:

- (1) Employee tests positive for COVID-19.
- (2) Employee must care for a spouse, child or parent who tests positive COVID-19.
- (3) Employee must quarantine at OMG’s request because of COVID-19 risk factors.
- (4) Employee is ‘high risk’ (age 65 or older and/or with an underlying medical condition that places them at a higher risk; and/or
- (5) Employee must care for an immediate child because the child’s school or daycare is closed due to COVID-19 (this exception only will be available through June 30, 2020).

To date, we have permitted employees to take time off if they are concerned about potential exposure to the virus at work. Employees still can use PTO for this purpose, but not COVID-19 unpaid leave. We believe we have established a rigorous safety protocol that exceeds the requirements set by the states in which we operate.

**If an employee has exhausted his or her PTO and needs to request unpaid COVID-19 leave, the special paper Time Off Request (TOR) we created should be used for this purpose.**

*Continuous Leave.* Time off for the COVID-19 purposes listed above must be taken continuously, and not intermittently, unless the employee qualifies for Family Medical Leave (FMLA).

*PTO pulled concurrent.* If an employee takes leave for COVID-19 purposes starting June 1, 2020, he or she will be required to exhaust available PTO concurrently. We will exhaust available PTO automatically.

*Documentation.* We will require documentation for COVID-19 unpaid leave requests. If an employee presents with potential symptoms of COVID-19, we will ask that he or she follow up with a physician.

If an employee is exposed to a close contact who has tested positive, we will need confirmation of that risk. If an employee tests positive, he or she must provide a release from the treating COVID-19 physician to return to work. We also will require documentation of the school or daycare closing if an employee requests unpaid time off for childcare purposes (available through June 30, 2020).

*Spouse, child, parent.* We will apply the definitions of 'spouse', 'child' and 'parent' included in our Attendance Policy to these leave requests.

- B. Unpaid leave 'earned' (PTO Swap).** In March 2020, we offered employees needing to take time off for COVID-19 purposes the option of earning one unpaid day for each PTO day used up to a maximum of 15 unpaid days. Our intent was to allow employees the ability to be paid for some of the time taken from work because of the virus, while still having time to use for personal needs later in the year.

If an employee took advantage of this option, he or she has been credited with one unpaid day for each PTO day **used for COVID-19 purposes** up to a maximum of 15 days for the period from March 15, 2020 through June 1, 2020. These are available for use starting June 1, 2020 as follows:

- (1) Each unpaid day credited must be taken in full day increments (this time cannot be broken up and taken on an intermittent basis).
- (2) Employees wishing to use unpaid credits must request this time by submitting the special COVID-19 TOR to his or her supervisor or manager. Please indicate in the comment section that the request is to use unpaid COVID-19 credited time.
- (3) The special COVID-19 TOR Form must be approved 24 hours in advance of the date requested, and submitted to Payroll in advance. **As with regular PTO, the Company reserves the right to decline a request for unpaid COVID-19 credits based on business needs.**
- (4) If an employee is absent and has not submitted an approved special COVID-19 TOR form in advance, we will apply any PTO he or she has available to the time taken and treat the absence as unapproved.
- (5) All unpaid COVID-19 credits must be used on or before December 31, 2020.

Many employees worked the period March 15, 2020 through May 29, 2020 without using PTO for COVID-19 purposes and/or without earning the maximum of 15 unpaid days for PTO used for COVID-19 purposes. If these employees require time off in 2020 for the COVID-19 purposes listed under A(1)-A(5) above, we will continue to offer them the opportunity to earn unpaid days up to a maximum of 15 days. This unpaid time must be taken in accordance with the guidelines set forth above.

To check on unpaid credits available to you, please reach out to Lisa Gaouette at [lgaouette@omginc.com](mailto:lgaouette@omginc.com) or 413-789-0252 x1207.