

TEAM MEMBER CULTURE

A QUICK REFERENCE ON SAFCO POLICIES AND EXPECTATIONS



The *Southern Auto Finance Company Team Member Guidebook* (the “*Guide*”) contains confidential information proprietary to Southern Auto Finance Company (“the “Company”). All rights to this document, both domestic and international, are reserved by the Company. No part of this document may be reproduced, stored in a retrieval system, or transmitted in any form or by any means (i.e., electronic, mechanical, photocopying, or otherwise), or loaned to any person, without the express written consent of the Company.

Note that throughout this *Guide*, you may find personal testimonials from our team members and dealer partners. These personal feelings do not carry the legal effect of SAFCO policy. Instead, they are intended to showcase the thoughts of these individuals on what working with SAFCO means to them.

Of course, this *Guide* is only intended as a summary and cannot cover every eventuality that may arise. Since many policies are frequently revised or updated, the *Guide* only provides a general description and it should not be regarded as a promise to provide specific terms and conditions of employment. For complete benefit and policy details, contact the Human Resources Department.

While SAFCO makes every effort to maintain positive relations, team members who violate any of the policies outlined in this *Guide* are subject to disciplinary action, up to and including unpaid disciplinary suspension and/or termination of their employment. If you have any questions about these basic responsibilities, or what we expect of you as our team member, please discuss them with your supervisor or the Human Resources Department.

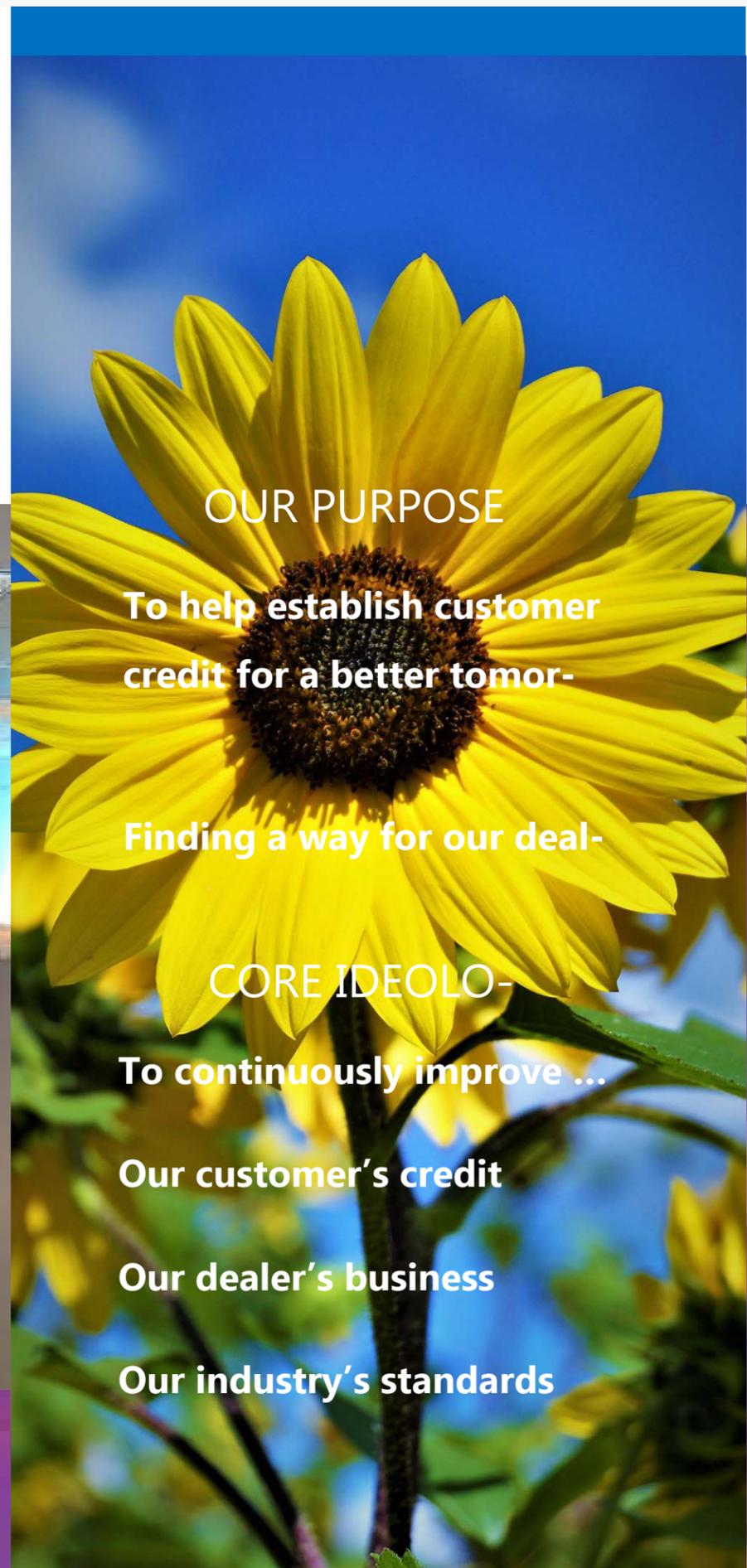
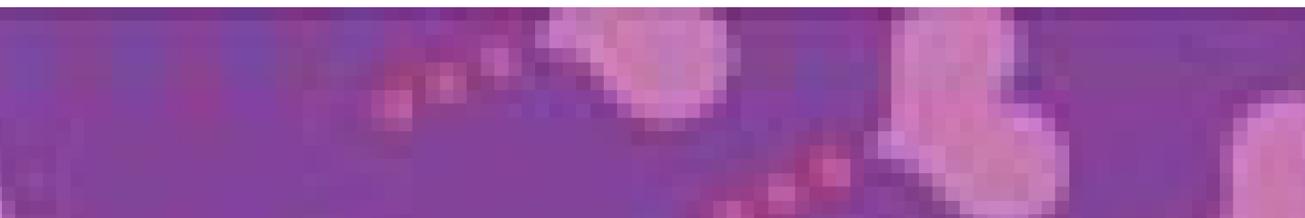
TABLE OF CONTENTS

1.	What We Are All About	7
2.	Your Working Environment	11
3.	Your Hours Attendance	21
4.	Your Compensation	27
5.	Your Benefits	29
6.	Health and Safety	31
7.	Evaluating Your Job	35

WHAT WE STAND FOR

At Southern Auto Finance Company, LLC—SAFCO—our mission is to be the premier provider of sub-prime auto financing for the credit-challenged consumer. Now more than ever, our services are valued in the markets that we serve. Our Core Ideology is rooted in the key values that you will experience every day during your time at the Company.

No matter which job you do here, each team member brings unique skills and talents that are essential to accomplishing our mission of helping our customers obtain a vehicle they want and can afford. There is nothing unique about the products and services that we offer – there are many competitors that provide the same things. What sets us apart is the expertise of our team members, supported by one of the



OUR PURPOSE

To help establish customer credit for a better tomorrow

Finding a way for our dealers

CORE IDEOLOGY

To continuously improve ...

Our customer's credit

Our dealer's business

Our industry's standards

A RECORD OF ACHIEVEMENT

Founded in 1990 by George Fussell, Southern Auto Finance Company, LLC initially served as the captive lender for Anything on Wheels in Fort Lauderdale, Florida. The Company has since grown into becoming one of the leading and most experienced providers of sub-prime automotive consumer financing in the nation.

1998

Began indirect lending to Franchise and Independent dealerships in the State of Florida

2001

Opened Customer Call Center in Orlando, Florida

2003

Established preferred lending relationship with Auto Nation and expanded in Florida's markets.

2004

Introduced the Credit Builder concept, 'specializing in providing fast and flexible financing for individuals with prior credit problems, no previous credit history and or hard-to-verify income'

2006

Established a credit line with Wells Fargo Preferred Capital, an industry-leading provider of senior secured financing to consumer finance companies

Moved to new office in Ft. Lauderdale, Florida

2007

Relocated to a new call center in Orlando, Florida

Integrated our loan origination system to Dealer Track, a comprehensive software that operates the largest online credit application network in the United States

2010

Integrated our loan origination system with RouteOne, another industry-leading credit application management system.

Moved to new corporate Headquarters in Fort Lauderdale, Florida

Expanded Marketing and Originating markets

2013

Expanded the Credit Builder Program to all Franchise Dealers

Created a National Sales Department responsible for originating business and servicing dealer partners

Moved call center into new state of the art facility in Orlando, Florida

Expanded Marketing and Originating markets

2014

Launched a new loan origination system provided by Defi Solutions

Expanded our National Buying Center; catering to the retail hours of all dealer partners

2015

Converted from S-Corp to LLC, rebranding ourselves as Southern Auto Finance Company, LLC d.b.a. SAFCO

Currently Marketing and Originating in 23 states with plans for expansion for and additional 11 states

2018

SOME HELPFUL CONTACTS

So that you have quick access to contacts you need, we've compiled this list for your reference.

Resource	Questions On ...	Call ...
 HR Helpdesk	Confidential assistance with employment-related issues	HR Helpdesk
	General Human Resources Questions	HR Helpdesk
	Insurance Plan Questions	HR Helpdesk
	401(k) Questions (investments/withdrawals/loans)	HR Helpdesk
	Professional Counseling and Life Guidance	HR Helpdesk
	Worker's Compensation Claims	HR Helpdesk
 Administration	National Vendor Agreements/Facilities Management	Accounting
	Systems Issues/Technology Requests	Information Technology
 Operations	New Dealer Agreements/Finance Products	Operations
	Applications In Progress	Operations
	Contracts In Process	Operations
	Customer Questions/Complaints/Disputes	Operations



**GREAT RESULTS
COME FROM GREAT PEOPLE**

Our team members are here to provide solutions by removing the friction from the process and finding a way for our dealer partners





SAFCO

SUB-PRIME AUTO FINANCE

WHAT WE ARE ALL ABOUT



SETTING THE

All of us bring a great deal of energy to our jobs. We live in a fast paced environment where everything we do has a sense of urgency. While you're here, you'll work hard, but at the end of the day, you'll have that great sense of accomplishment that comes from making a contribution to a winning team.

In our daily business activities, the Company has to rely on your creativity, resourcefulness, and initiative to be successful. By far the most important qualities to guide you in your decision making are a strong sense of integrity and a commitment to the values that make SAFCO a leader in our industry. The Company has implemented certain reasonable policies and rules to conduct our business. This section of your *Guidebook* discusses your responsibilities to the Company as a team member.

General Requirements

The trust that our customers, vendors, and the communities in which we operate place in our Company is just as valuable as the products and services that we offer. Each of us is personally responsible for safeguarding and maintaining that trust. To this end, we expect every team member at every level to behave ethically and responsibly, and to comply with all laws and regulations that govern our work.

Listed below are some basic guidelines for everyone to follow:

- Courtesy is the responsibility of every team member. Everyone is expected to be courteous, polite, and friendly to our customers, vendors, and to their fellow team members. No one should be disrespectful, create a hostile environment, use profanity, bully, or otherwise engage in any activity that may damage SAFCO's reputation.
- We have made a large investment in our facilities and equipment to better serve our customers and to make your job easier. Deliberate or careless misuse or damage to Company property will not be tolerated under any circumstances. Be sure to treat all Company property that you use or come in contact with as if it is your own. This includes the personal information of customers.
- SAFCO requires the utmost integrity from every team member. Alteration, falsification, misrepresentation (i.e., inaccuracy or omission), manipulation, or dishonesty of any kind, either verbally or in writing, of any facts or information requested, required by, or submitted to the Company will not be tolerated under any circumstances.
- We expect every team member to follow the instructions of their supervisors and other members of SAFCO leadership, as well as the policies on conduct that are outlined in this *Guidebook*. Failure to do so constitutes insubordination.
- Our policies prohibit the misuse or use without authorization of the supplies, equipment, vehicles, or other property of customers, vendors, other team members, or the Company. We ask that you treat our property as if it is your own.
- Team members are expected to make every effort to learn their job and to perform that job at a satisfactory level. Any team member who fails to maintain a satisfactory level of performance is subject to corrective action.
- No team member may engage in any unlawful activity, either on or off the job, as this can adversely affect SAFCO's reputation in the communities we serve.
- Team members are not permitted to photograph, videotape, or electronically record any Company property, team members, business operations, or communications without the prior written approval of senior leadership.

Service Quality

Our entire business revolves around our relationships. We believe that one of our most important responsibilities is to the people who count on us for their vehicle financing needs. We will deal with customers honestly, and they will know that they can depend not only on our products and services, but on our word and our character as well. SAFCO will promise only what we can deliver, and when we err, we will make our best efforts to make things right as soon as is practical.

Business Courtesies

At no time should a team member accept or solicit gifts from a current or prospective vendor, outside supplier, or customer. They should also not accept goods and services provided to SAFCO as your own. Ordinary business courtesies, such as payment for a modest lunch or dinner, entertainment, or refreshments offered at a vendor's event are acceptable. Business courtesies that are promotional in nature, and that are distributed routinely by a vendor or outside supplier, are also acceptable.

Gratuities, cash gifts, payments of commission, or rebates offered to team members cannot be accepted at any time and should be returned immediately to the donor. All instances should be immediately reported to senior leadership. If you are responsible for recommending, directing, or purchasing supplies, materials, or services or disposal by sale of Company-declared surplus property, you must provide written disclosure of any direct or indirect interest in these purchases or sales to your department supervisor. In addition, team members must never accept any offer from a vendor, outside supplier, or customer to obtain merchandise or supplies at a discounted price for their own personal use, either directly or indirectly, unless it is part of an approved SAFCO program.

Fair Competition

The Company competes solely on the merits of our finance products and services, on our fees and rates, and on the strength of the dealer partner relationships that we have built. Our goal is to deal fairly with our customers and to attract new customers because we provide products and services that people want.

Avoid discussions with competitors and potential competitors unless the discussions have an appropriate business purpose, and then keep the discussions to a minimum. It is particularly important not to enter into any agreement with a competitor that has the potential to reduce competition, unless the agreement has been cleared in advance by SAFCO senior leadership. Certain types of agreements with competitors are always illegal and must be avoided regardless of the circumstances (e.g., agreeing with competitors on prices you or they will charge or locations where you or they will offer services, etc.). If a conversation with a competitor enters an inappropriate topic, end the conversation at once and report it to a member of senior leadership.

Be accurate and truthful with customers, and take particular care when describing the quality, features, or availability of our products and services. Be similarly careful if you describe a competitor's products or services. It is unwise to criticize a competitor to a customer, and it is inappropriate to interfere with any contract between a competitor and a customer of the competitor.

Theft and Fraud

By providing team member guidelines and responsibilities to promote honesty and high ethics, the Company intends to prevent, deter, or detect fraud. **Fraud** is defined as any intentional false representation or concealment of a material fact committed to obtain an unfair or unlawful gain. Each team member must be familiar with the types of fraud that might occur within their area of responsibility, and be alert for any indication of fraud.

Some actions that are considered fraudulent include:

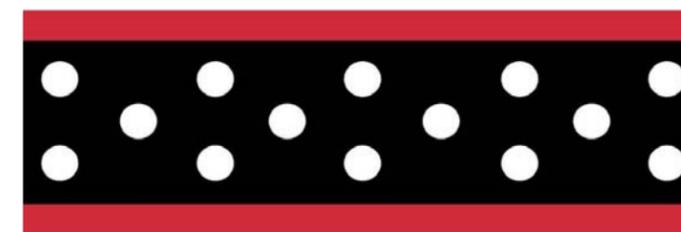
- Any dishonest act
- Misappropriation of SAFCO assets
- Inappropriate or unauthorized use, removal, or destruction of Company assets
- Falsification, forgery, or alteration of any Company record
- Falsification, forgery, or alteration of a check, bank draft, or any other financial document
- Impropriety in the handling or reporting of money or financial transactions
- Accepting or seeking anything of material value from contractors, vendors, cus-

No Harassment

SAFCO strives to create a positive and productive work environment for all of its team members. We take this goal very seriously, and have adopted a zero tolerance policy towards any type of harassment in the workplace. This includes not only actions between team members, but those of applicants, customers, and vendors as well. The term **harassment** refers to, but is not limited to threatening behavior, slurs, jokes, and other verbal, graphic, physical, or electronic (e.g., e-mail, text messaging, social media platforms, etc.) conduct or actions of any nature involving either members of the opposite or same sex. The term "harassment" also includes sexual advances, requests for sexual favors, and offensive touching.

The Company takes all allegations of harassment seriously, and all such claims will be thoroughly investigated. If an investigation confirms that harassment has occurred, SAFCO will take corrective disciplinary action, up to and including unpaid disciplinary suspension and/or termination of employment. Additionally, findings of assault or the threat of assault will result in immediate termination.

Team members who feel they are being harassed in any way by a team member, supervisor, customer, or vendor must report the problem as soon as possible using one of the approved channels. Your notification in reporting harassment in the workplace is essential to us. Be assured that you will not be penalized or retaliated against in any way for reporting a harassment problem. The matter will be thoroughly investigated and disciplinary action will be taken where appropriate.






– Commitment –

[ke-mit' ment] *noun*

The state or quality of being dedicated to a cause, activity. A pledge or promise; obligation.

Finding a way for our dealers and their customers

No Bullying

SAFCO has instituted an "Anti-Bullying" policy to communicate to all team members, including members of leadership, that the Company will not *in any instance* tolerate bullying behavior. Team members found in violation of this policy will be disciplined, up to and including unpaid disciplinary suspension and/or termination.

The term "bullying" is defined as repeated inappropriate behavior, either direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment. Such behavior violates SAFCO's *Code of Conduct*, which clearly states that all team members will be treated with dignity and respect.

Bullying may be intentional or unintentional. However, it must be noted that when an allegation of bullying is made, the intention of the alleged bully is irrelevant, and will not be given consideration when administering discipline. As with harassment, it is the effect of the behavior on the individual that is important. Although this list is not intended to be all-inclusive, SAFCO considers the following types of behavior examples of bullying:

- **Verbal bullying:** Slandering, ridiculing, or maligning a person or their family; persistent name calling that is hurtful, insulting, or humiliating; using a person as butt of jokes; abusive and offensive remarks.
- **Physical bullying:** Pushing, shoving, kicking, poking, tripping, assault, or threat of phys-

tomers, or any other persons doing business with SAFCO

- Paying or receiving bribes or kickbacks
- Disclosing confidential and proprietary information to outside parties.
- Profiting as a result of insider knowledge of Company activities
- Disclosing financial activities engaged in or contemplated by the Company to outside entities
- Adding dependents to your insurance who are not eligible (e.g., fiancée, common-law spouse, parents, etc.)
- Any similar or related inappropriate conduct

All reports will be kept in the strictest confidence.

the Company's business relationship with the supplier.

- A team member is employed by a company that directly competes with SAFCO.

Many other situations exist where a team member could be placed in a position inconsistent with their duty to the Company. Whenever the facts of a particular situation contain any suggestion of a conflict of interest, bring them to the attention of your supervisor.

Use of the Company Name or Associated Trademarks

Unless authorized by the CEO, no team member may represent or imply SAFCO sponsorship or endorsement of any political, social, or religious activity or cause. Additionally, no written or videotaped material produced by SAFCO or trademarked name or logo may be reproduced without the express written consent of senior leadership.

Accuracy of Books/Records

Accurate, timely financial records and controls provide the core information that is necessary to manage our business. These records and controls also are essential to fulfilling our various obligations. In general, all financial records and information must follow both:

- U.S. generally accepted accounting principles (GAAP)
- Effective internal controls (i.e., procedures to protect the Company's assets)

All business transactions must be properly authorized as well as completely and accurately recorded on the Company's books. Procedures for doing so must comply with SAFCO's financial policy and policy for authorization and documentation, as well as follow generally accepted accounting practices.

Budget proposals and other financial evaluations and forecasts must fairly represent all information relevant to the decision. In addition, no unrecorded cash funds or other asset accounts will be established or maintained for any purpose.

Competitive Intelligence

Competitive information is a valuable tool that allows us to understand and manage our markets, products, and services so we can better meet our customers' needs. However, we must gather and use that information properly.

It is important that we comply with the law in acquiring competitor information, which, of course, prohibits theft, blackmail, wiretapping, electronic eaves-dropping, bribery, improper inducement, receiving stolen property, threats, and other improper methods.

It is also important that we acquire information ethically. We must not misrepresent who we are or who we work for. We will also respect the confidentiality of our competitors' and suppliers' information. We will not use information another company has marked "proprietary" or "confidential" (or information we have reason to think should have been marked that way), regardless of how it was obtained, unless the owner of the information gives us the material for a specific purpose or the material has become public information. Be sure that a nondisclosure agreement has been signed by

authorized representatives of both parties before disclosing information.

Corporate Responsibility

SAFCO believes that an essential component of its corporate responsibility is to provide support to charitable organizations that benefit the communities in which we operate. We will make cash contributions and donate products and other in-kind services to qualified organizations and programs that address the needs of society. Any requests for donations received should be forwarded on to the Sales and Marketing Department for review and response.

Public Communications

Keeping information about new marketing programs, advertising plans, costs, and earnings confidential is critical to SAFCO's success and should not be discussed with the press (e.g., T.V., newspaper, radio, etc.) or other outside parties, except by those persons authorized to do so. In the course of your work, you may have access to restricted information regarding the Company, its lenders, its suppliers, its customers, and your fellow team members.

This information should not be discussed with anyone, except as necessary in the performance of your job. In today's electronic age, posting information on Internet bulletin boards or even communicating in blogs (other than internal/Company-provided spaces) is the same as speaking directly to a member of the media.

The only spokespersons permitted to talk to any outside third parties on behalf of the Company are the CEO and the CFO. The CEO is the point person for all media questions, while the CFO is the point person for financial questions. From time to time, any of these persons may refer certain inquiries to the appropriate Company officer or specialist.

Environmental Stewardship

Our responsibility to protect the environment is among our highest priorities. The Company complies with all environmental rules and regulations where we operate. The Human Resources Department can provide more information about our environmental standards.

Selling or Soliciting on Company Property

Team members are not permitted to solicit other team members for funds, contributions, memberships, or for any other purpose, other than for Company-sponsored events, when either team member is on Company time. "**Company Time**" is defined as all time when a team member is expected to be engaged in work-related tasks.

Additionally, distribution or circulation of non-work related literature is not permitted

Conflicts of Interest

Generally speaking, a conflict of interest is created when there is a clash between a team member's personal interest and their duty to the Company. Interests that otherwise might be questionable may be entirely proper if fully disclosed. Here are examples of where a conflict of interest may (or does) exist:

- A team member or their relative or spouse has an ownership interest in or benefits directly from a company that is a partner to SAFCO and can direct or influence

SAFCO

SUB-PRIME AUTO FINANCE



YOUR WORKING ENVIRON-



Seeing You Smile



Makes Me Smile

EMPLOYMENT AT WILL

Employment at SAFCO does not constitute a contractual relationship. SAFCO may terminate a team member at any time, for any reason, with or without cause or notice. Team members may also resign from the Company at any time, for any reason, and with or without notice, according to applicable local, state, and federal laws.

No one other than the CEO of SAFCO has the authority to modify the relationship between the team member and the Company, or make any agreement to the contrary. Any such modification must be in writing, signed by the CEO and the affected team member. Members of leadership are not authorized and cannot make any representations to team members or applicants regarding the terms or conditions of their employment with SAFCO that is not consistent with this policy.

ORIENTATION

SAFCO's new hire orientation program is designed to welcome new team members into the spirit and culture of our Company, to clearly establish SAFCO's performance expectations, and to set the stage for your success. Within the first three days of

your employment, you will participate in an orientation program conducted by a SAFCO representative, where you will receive important information regarding the performance requirements of your position, basic Company policies, your compensation, as well as a detailed overview of our benefits and safety programs, plus other information necessary to acquaint you with your job and SAFCO. We encourage you to ask any questions you may have during this program so that you will understand all guidelines that affect and govern your employment relationship with us.



INTRODUCTORY PERIOD

For new team members, your first 90 days of employment are an introductory period for both you and SAFCO. This time is intended to give you the opportunity to demonstrate your ability to perform in your new position, while at the same time determining whether it meets your expectations. You will be introduced to the Company, your job, and your new surroundings.

Use this time to ask your supervisor any questions you have about your job duties and to request feedback on your performance. During this introductory period, either party may elect to discontinue the employment relationship.

Completion of the 90-day introductory period **does not** change the team member's status as an at-will team member, or in any way restrict SAFCO's right to terminate such a team member or change their terms of employment.

Periodically, your Human Resources representative will meet with you during the introductory period to find out how things are going, and to see if there is anything that SAFCO can provide to make your onboarding more productive. We ask that you be candid during this conversation, as it is the way in which we can assist.

EQUAL EMPLOYMENT OPPORTUNITY

SAFCO is an Equal Employment Opportunity Employer. We afford equal employment opportunity in all of our employment practices, including the selection, hiring, promotion, transfer, and compensation for all qualified applicants and team members without regard to race, color, religion, sex, national origin, age, marital status, citizenship status, disability, status as a veteran, or any other protected status in accordance with the requirements of all federal, state, and local laws.

We expect every team member and member of leadership to reflect the spirit of this commitment and philosophy with our fellow team members, our customers, and our dealer partners.

EMPLOYMENT OF MINORS

SAFCO will not hire any applicant under the age of 18 for any position, except for positions such as internships, temporary workers, seasonal workers, and other similar job classifications.

PERSONAL COMMUNICATIONS

Because we have a limited number of telephone lines at each facility, it is essential that these lines remain open for customer and business-related calls. Therefore, we ask our team members to limit the number of personal calls they make and receive via SAFCO's telephone system. Team members should also refrain from using Company toll-free lines or other telecommunications devices for personal reasons.

Team members should not consider their conversations on the Company's telephone or e-mail systems to be private. Those team members who use SAFCO's voicemail or e-mail systems to convey insensitive, improper, derogatory, insulting, threatening, or harassing language or remarks are subject to disciplinary action, up to and including unpaid disciplinary suspension and/or termination of their employment.

To maintain a productive work environment, team members may not use personal electronic communications devices (e.g., "Smart Phones") when they interfere with the performance of job responsibilities. Personal calls or texts should only be made or received on these devices when absolutely necessary. In certain instances, team members must keep their personal communications device on their person or in their desk drawer and not on top of their desk. Your supervisor will advise you if this rule pertains to your work situation.

USE OF SAFCO TECHNOLOGY

The use of electronic information resources (e.g., computers, e-mail, voicemail, Internet access, remote directories, etc.) in conducting SAFCO's business is widespread and expanding. Here are the general requirements with respect to the use of these Company-owned or provided resources so that all who use them will have a clear understanding of their individual responsibilities in this area.

SAFCO's electronic information resources include:

- All information systems
- Computers and communications facilities
- E-mail and voicemail systems
- Laptops and iPads
- Telephones and telecommunications services
- Social media platforms

The Company also maintains an internal instant messaging system to conduct its business. Because of this, team members are prohibited from downloading and using personal, consumer-grade IM software (e.g., Yahoo! or MSN Instant Messenger) to transmit messages via the public Internet. Furthermore, the IM system is only intended for business use, and all IM communications and information transmitted, received, or archived in the Company's IM system belong to SAFCO. Team members are prohibited from using system resources, fellow team member time, or their own time sending personal instant messages or engaging in unnecessary chat not related to SAFCO's business.

Accounts with online services and access mechanisms for those services and for the Internet as a whole are the property of SAFCO and are to be used for the purpose of conducting its business. Access to, and the use of, any of these resources through connections to its communications networks is provided only on condition that the user acknowledges that their connection and use comply with the provisions of this policy. In addition, SAFCO team members must always use professional and appropriate language in all e-mails and instant messages. Team members are prohibited from sending or posting abusive, harassing, threatening,

menacing, discriminatory, pornographic, disrespectful, or otherwise offensive messages. Team members are also prohibited from sending jokes, rumors, gossip, or unsubstantiated opinions via the Company e-mail and IM systems, as well as Company-owned social media platforms.

All information processed on or through these resources is Company property. All users must maintain, protect and respect the confidentiality of sensitive information, including but not limited to:

- Intellectual property or proprietary data
- Human resources information
- Information subject to attorney-client or physician-patient privilege
- Confidential source protections
- Information subject to other legislative or regulatory protections.

Each user must cooperate with SAFCO's efforts to control and protect access to Company information assets through the use of access procedures and tools approved by the Company. Each department should ensure that its users employ passwords for access to all resources that comply with Company guidelines. Access privileges should be granted only on a business-need basis, and then only with the level of access needed to perform the job.

We reserve the right to monitor the use of its electronic information resources, including the right to override individual passwords or other security techniques, to carry out and safeguard SAFCO's business, and to ensure compliance.

USING PERSONAL TECHNOLOGY

SAFCO team members may have the opportunity to use their personal electronic devices (i.e., cellphones, smartphones, tablets, laptops and computers) for work purposes when authorized in writing, in advance, by the team member and Company leadership. The use of personal devices is limited to certain team members and may be limited based on compatibility of technology.

Restrictions On Authorized Use

Team members whose personal devices have camera, video or recording capability are restricted from using those functions anywhere on Company property at any time, unless authorized in advance by leadership. This policy applies to all users of personal devices, whether authorized for work use or not.

While at work, team members are expected to exercise the same discretion in using their personal devices as is expected for the use of Company devices. SAFCO's policies pertaining to harassment, discrimination, retaliation, trade secrets, confidential information and ethics apply to team member use of personal devices for work-related activities. Moreover, team members may not download applications, programs, or other software not provided through SAFCO's Information Technology Department, nor may they click on links in unsolicited e-mails.

A team member may not store information from or related to former employment on SAFCO's applications. Family and friends

should not be allowed to use personal devices that are used for Company purposes.

Privacy/Company Access

No team member using their personal device should expect any privacy with the use of the SAFCO network except that which is governed by law. SAFCO has the right, at any time, to monitor and preserve any communications that use the Company's networks in any way, including data, voice mail, telephone logs, Internet use, and network traffic, to determine proper use.



Leadership reserves the right to review or retain personal and company-related data on personal devices or to release the data to government agencies or third parties during an investigation or litigation. SAFCO may review the activity and analyze use patterns and may choose to publicize these data to ensure that SAFCO's resources in these areas are being used according to this policy. Furthermore, no team member may knowingly disable any network software or system identified as a monitoring tool.

Any team member who has been given authorization to access the SAFCO network on their personal communication device authorizes SAFCO to wipe that device clean of any Company information.

Safety

Team members are expected to follow applicable local, state and federal laws and regulations regarding the use of electronic devices at all times. Those team members whose job responsibilities include regular or occasional driving are expected to refrain from using their personal devices while driving. Regardless of the circumstances, including slow or stopped traffic, team members are required to pull off to the side of the road and safely stop the vehicle before placing or accepting a call or texting. Special care should be taken in situations involving traffic, inclement weather or unfamiliar areas.

Team members who are charged with traffic violations resulting from the use of their personal devices while driving will be solely responsible for all liabilities that result from such actions.

Lost, Stolen, Hacked, or Damaged Equipment

Team members are expected to protect personal devices used for work-related purposes from loss, damage or theft. SAFCO will not be responsible for loss or damage of personal applications or data resulting from the use of company applications or the wiping of Company information.

Termination of Employment

Upon resignation or termination of employment, or at any time on request, the team member may be asked to produce the personal device for inspection. All Company data on personal devices will be removed by the IT Department upon termination of employment.

SOCIAL MEDIA

The rapid growth of social media platforms, including Facebook, Twitter, LinkedIn, Reddit, and Pinterest, make them highly-popular methods of communication. These platforms, however, also hold the possibility of a host of unintended consequences. To

PERSONAL APPEARANCE

We expect all team members to present a neat, clean, and well-groomed appearance at all times that leaves a positive impression, even if you are not directly facing our customers.

Avoid extremes in dress and behavior. Flashy or revealing clothing, tee-shirts, shorts, and other non-business-like clothing are **unacceptable**. Buttons and other insignias that are used to advertise a product or point of view, or make a political statement are also **unacceptable**.

SAFCO wants to create and maintain a professional image at all times, including casual days. If you report to work improperly dressed, your supervisor will instruct you to return home to change clothes or take other appropriate action. You will not be compensated for time spent away from work in this occurrence. Repeated violations of this policy may be cause for disciplinary action. This policy applies at all times when you are in the office, including when in the break areas or outside spaces.

Support Center and Corporate Team Members

SAFCO wants to create and maintain a professional image at all times. Our offices could have customer contact every day of the week, so it's important we present ourselves professionally (including casual Fridays).

The dress code is as follows:

- No flip-flops (except on designated days), including sandals with no backs. All sandals and shoes must have a back on them.
- Appropriate shoes must be worn at all times while in the office.
- No tank tops, tube tops and/or halter tops (anything that may reveal the midriff is not permitted). No spaghetti straps. All tops must cover cleavage appropriately. No low cut tops in the front or the back. No racer back shirts.
- No shorts.
- No jeans on days other than casual days, (jeans may be worn with a logoed SAFCO shirt).
- No flashy or revealing clothing. No undergarments should be showing at any time.
- Bizarre hair coloring or extreme hairstyles are not permitted.
- Tattoos and similar body art must be covered during business hours.
- No Spandex, stretch pants, or yoga pants.
- No sloppy clothing (e.g., pajamas etc.).



SAFCO FUNCTIONS

From time to time, SAFCO may sponsor picnics, parties, and team member participation in recreational programs. Since participation in these functions and programs is voluntary, we will not accept responsibility for any personal injury, property damage, expense, or accident occurring in connection with any of these Company functions or recreational programs. Any incident that occurs at a SAFCO-sponsored function must be immediately reported to Human Resources.

COMPANY CONTRIBUTIONS

Solicitations of team members for contributions to political parties or to candidates for public office may not be made.

DEPARTMENT MEETINGS

Departments meet to communicate goals and objectives and to discuss workplace issues of interest. Team members should check with their supervisors to obtain a schedule of the meetings. Generally, prompt attendance at these meetings is considered mandatory.

WORKSTATION COVERAGE

In the interest of maintaining good customer service and control of the work flow, it is important that your supervisor know whenever you are not at your assigned station. If you are a team member who directly interacts with our customers (e.g., SAFCO Credit Advisor, etc.), you must advise your supervisor before leaving the area. If you work in a different area,  inform your supervisor if you will be away from your work area for an extended period of time.

When leaving your work area, inform fellow team members as to where you will be and when you will return, so that work continuity can be ensured. If you must leave your work area for a personal emergency, you must first advise your supervisor to ensure the department is adequately staffed.

BULLETIN BOARDS

SAFCO maintains bulletin boards at various locations to serve as an important source of information. These bulletin boards may only be used to post information approved by the Company regarding our policies, government regulations, internal job postings, and other matters of concern that are related to your employment.

Please develop a habit of checking the bulletin boards on a daily basis so that you will become familiar with the information post-

ed. All information posted on these bulletin boards must be approved by the Human Resources Department.

VISITORS

Visitors will be governed by the appropriate corporate guidelines whenever safety is a concern. Note too that unless scheduled for work, team members are expected to remain off premises.

BUSINESS AND TRAVEL EXPENSES

Travel, entertainment, and other business-related expenditures are a necessary operations expense. We will reimburse team members for actual, reasonable, and proper business-related expenditures that are supported by receipts.

Team members who incur business-related expenses must document them using an *Expense Report* (available on the SAFCO Toolbox) and have it approved by their supervisor to obtain reimbursement. A complete copy of the applicable policy is available in the *Operations Manual*.



PARKING

So that we have sufficient parking for everyone, all team members must park their vehicles in the area designated for team member parking. If you have any questions as to where you should park, please ask your supervisor.

Note that certain spots are marked as reserved as SAFCO and are intended for members of SAFCO leadership. Ask your Human Resources representative if you have any questions about parking at your facility.

VEHICLE SAFETY

SAFCO is not liable for vandalism, theft, or any damage to cars parked on Company property.

WORKPLACE VIOLENCE

SAFCO is committed to providing a safe, violence-free workplace and strictly prohibits team members, dealer partners, consultants, customers, visitors, or anyone else on SAFCO premises or engaging in a Company-related activity from behaving in a violent or threatening manner. Workplace violence includes:

- Threats of any kind, or threatening, physically aggressive, or violent behavior (e.g., intimidation of or attempts to instill fear in

OPEN COMMUNICATIONS

If there is something about your job that's bothering you, let's get it out in the open and discuss it. Our "Dispute Resolution" Procedure offers all team members the freedom to discuss anything they wish with their supervisors. Whenever you have a problem, it can usually be resolved by following the steps outlined here.

Airing Your

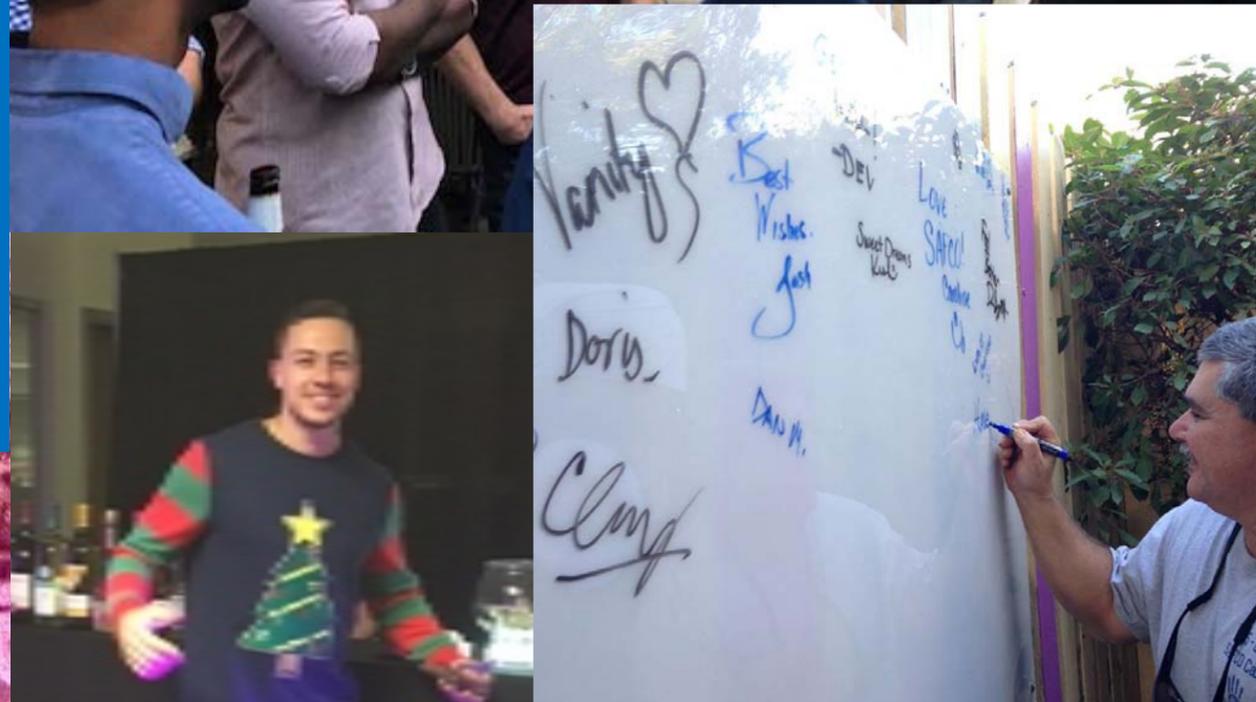
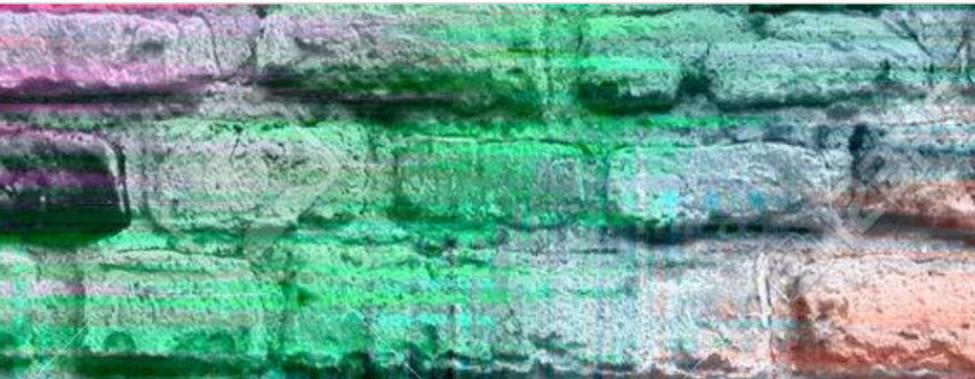
We ask that you follow this chain of command to ensure an orderly resolution of your issue. In the event you have a concern, and for personal reasons you cannot follow the steps in this procedure, you may contact the Human Resources Department.

- First, discuss any concern with your immediate supervisor. Very often, your immediate supervisor is in the best position to satisfactorily handle your problem.
- If you are not comfortable speaking with your supervisor, if your immediate supervisor cannot solve the problem, or if you are not satisfied after Step 1, you should request to speak to your next level of leadership or the Human Resources Department.
- If you still feel the need to speak to a higher authority after you have completed step 2, we encourage you to



You may also speak with the Human Resources Department at any time. Additionally, you may contact the HR Helpdesk to receive confidential assistance in handling your concern.

WE GIVE FULL
CONSIDERATION



help you identify and avoid potential issues, SAFCO has compiled some recommended best practices intended to help you understand the implications of participating in social media. These guidelines apply to social media platforms now or to be developed.

Social media platforms may not be utilized while on Company time except in the performance of your job.

Team members are encouraged to repost and share information with their family and friends that is available to the public (e.g., press releases, news articles, etc.). The best way to share Company news is to link to the original source. Information that is not a matter of public record may not be shared outside the Company under any circumstances. When posting to a social media site you should:

- **Maintain Confidentiality** - Do not post confidential or proprietary information about SAFCO, its lenders, dealer partners, customers, vendors, or your fellow team members. Use good ethical judgment and follow the Company's Code of Conduct and federal requirements.
- **Think Before You Post** - There's no such thing as a "private" social media site. Search engines can turn up posts and pictures years after the publication date. Comments can be forwarded or copied. Archival systems save information even if you delete a post. If you feel angry or passionate about a subject, it's wise to delay posting until you are calm and clear-headed.
- **Be Authentic** - Be honest about your identity. In personal posts, you may identify yourself as a SAFCO team member. However, please be clear that you are sharing your personal views and are not speaking as a formal representative of SAFCO. If you identify yourself as a member of the SAFCO team, ensure your profile and related content are consistent with how you wish to present yourself to others.
- **Correct Mistakes** - If you make a mistake, admit it. Be upfront and be quick with your correction. If you're posting to a blog, you may choose to modify an earlier post—just make it clear that you have done so.
- **Do Not Use the SAFCO Logo or Make Endorsements** - Do not use the logo, tagline, or any other SAFCO marks or images on your personal online sites. Do not use the Company's name to promote or endorse any product, cause or political party or candidate.
- **Do Not Use Pseudonyms** - Never pretend to be someone else. Tracking tools enable supposedly anonymous posts to be traced back to their authors.
- **Ensure It Passes the Publicity Test** - If the content of your message would not be acceptable for face-to-face conversation, over the telephone, or in another medium, it will not be acceptable for a social networking site. Ask yourself, ***would I want to see this published in the newspaper or on a billboard tomorrow or ten years from now?***

If you have a concern or complaint about something in your work environment, we encourage you to take advantage of SAFCO's "Open Door" policy and share your feedback directly with your supervisor, another member of Company leadership, or the HR Helpdesk.

OUTSIDE EMPLOYMENT

There have been times when some of us have had the opportunity or the need to hold two jobs at the same time. It is important, however, that outside employment and interests do not interfere in any way with SAFCO's operations. When accepting outside employment, avoid any situation that adversely affects your current job or performance at work, competes with the business objectives of the Company, or gives the appearance of being a conflict of interest.

You may not work for any employer or operate a personal business that offers goods or services that are competitive with those offered by SAFCO, or work for our customers or dealer partners when you may be in a position of personal gain.

INFORMATION SECURITY

An effective clean desk effort involving the participation and support of all SAFCO team members can greatly protect sensitive information about our customers, dealer partners, and vendors. SAFCO requires all team members to clear their desks of all papers at the end of the day or their work shift. All team members should familiarize themselves with the guidelines of this policy.

General Safeguards for Information Security

- Physical access to SAFCO facilities is controlled with electronic badges; file storage rooms and server rooms are further secured with physical keys. The Administration and Human Resources departments work together to
- All offices and/or rooms with a locking door will be locked at the end of the business day.
- All visitors must be accompanied by a member of leadership while in the office.
- Food or other delivery personnel will not be allowed on the main office floor, and must be met by the team member who placed the order in the lobby.
- Incoming and outgoing mail collection points will be supervised during the business day and will be secured outside normal business hours.
- Customer credit card, bank account information and SSNs cannot be included in internal or external electronic communications.

Disposal of Sensitive Information

SAFCO only retains information that is necessary to conduct business, for as long as needed or required by law. The Company's *Record Retention Policy* outlines how long various kinds of information must be stored and when they should be destroyed.

To facilitate compliance with the *Record Retention Policy*, the Company provides secure shredding bins throughout its facilities; only non-sensitive documents are disposed of in regular trash. Electronic files are eliminated as required with sophisticated "wiping" utilities designed to remove all traces of SAFCO information.

others, etc.)

- Other behavior that suggests a propensity towards violence, including belligerent speech, excessive arguing or swearing, sabotage or threats of sabotage of Company property, or an implicit or explicit refusal to follow Company policies and procedures
- Defacing SAFCO property or causing damage to the facilities
- Bringing weapons or firearms of any kind on SAFCO premises and parking lots, or while conducting Company business (except where permitted by law)

If a team member observes or becomes aware of any violent action or behavior by any person on Company property, they should immediately notify their supervisor. Furthermore, team members should immediately notify their supervisor if they are involved in a situation where a restraining order is in effect, if they have been served with a restraining order, if they observe another team member being served with a retaining order, or if a potentially violent non-work related situation exists that could result in workplace violence. All reports will be taken seriously and will be promptly and thoroughly investigated.

To fulfill our responsibility of providing a safe environment for our team members and customers, weapons are strictly prohibited on or in SAFCO property, except where permitted by law. Our policy applies to customers, dealer partners, and team members.

DOMESTIC VIOLENCE

SAFCO is committed to the health and safety of its team members. The Company does not tolerate domestic violence and offers support and referrals to assist our team members who disclose concerns or requests for help. Team members are highly encouraged to report threats or acts of domestic violence to local law enforcement authorities.

Nothing in this policy is intended to reduce or modify existing directives and policies regarding prevention of violence in the workplace. Actions will be taken to make sure you are safe, if you become the one that is being abused.

Domestic violence is defined as *physical, sexual, emotional, economic, or psychological actions or threats of actions that influence another person*. Domestic violence includes, but is not limited to, actual or potential physical injury or harm, sexual abuse or threats of physical injury or harm, or sexual abuse against a person with a past or present intimate relationship such as marriage, dating, family, friends or cohabitation.

If you are a victim of, or suspect one of your fellow team members is experiencing domestic violence, contact the Human Resources Department. They are specially trained to assist in these situations, and will guide victims as to the proper procedures to follow at the workplace.

SAFCO requests that you provide relevant information needed to make sure that you are protected at all times. This includes:

- The description of the abuser's vehicle, and license plate number

- A detailed physical description
- A copy of the *Police Report* and the name of the law enforcement officer who took the report
- Copy of any restraining order or other pertinent legal document

SAFCO recognizes and respects a team member's right to privacy. Unless the substance of the victim's disclosure demands otherwise (e.g., extreme emergency), strict confidentiality will be maintained by informing others only to the extent necessary to protect the safety of the individual or other individuals in the workplace.

In the event of an intrusion on the premises, a safe room has been established at each facility to keep victims safe at all times. The building's management company will also be notified of the situation. The Company will conduct periodic informational meetings on the subject so the team is aware of proper procedures. SAFCO provides annual training on these procedures.

JOB POSTINGS

A team member may wish to apply for a posted job opening for more challenge, to experience a different environment, or for advancement opportunity. Team members seeking new opportunities to further their careers should be given consideration to do so by their supervisors. However, the timing of any transfer action should be planned so that ongoing work commitments will not be jeopardized by such actions.

SAFCO makes every effort to promote qualified candidates from within to positions of greater responsibility. The Company will advertise these positions via approved internal communications channels such as e-mail and bulletin boards. SAFCO is not obligated, however, to post every position, and will at times recruit outside the Company for skill sets that team members within the Company do not possess.

Transfers must be arranged with prior knowledge and consent of the two departments concerned. To be eligible, a team member must have satisfactorily completed one year of continuous service before requesting a transfer. Also, team members must be in good standing (i.e., not on any type of disciplinary action) and have received at least a "Satisfactory" rating on their most recent *Performance Conversations* to be eligible to apply.

EMPLOYMENT VERIFICATIONS

All employment verification inquiries for current or former team members who left SAFCO in good standing are provided by Human Resources for an official Company response. Under no circumstances is any other team member authorized to provide a written or official employment verification response for SAFCO. All requests must be made **in writing** via hr@gosafco.com, or faxed to 954.556.9220.

All requests for employment verification must contain the team member's signature authorizing the release of information. In the case of current team members, as a courtesy, the Human Resources Department will notify the team member when employment verification information is requested. Generally, SAFCO only releases the following information about current and former team members to external parties:

- Name
- Last job title
- Dates of employment

PERFORMANCE DEVELOPMENT

SAFCO believes that every team member should receive objective, accurate feedback regarding their job performance. Quarterly performance conversations are one of the tools that assist team members and leadership in achieving key results in team member performance, as well as giving the team member the opportunity to communicate openly with leadership regarding their professional goals. You should expect to receive a formal performance appraisal from your supervisor every quarter throughout your career with the Company.

PERSONNEL RECORDS

SAFCO maintains certain records on each team member that are directly related to their employment with the Company. This personnel file includes any information relating to your application, performance evaluations, disciplinary actions, salary changes, and promotions.

If you would like to review your personnel file, contact the Human Resources Department to schedule an appointment. They will set up the appointment with your supervisor. For the mutual protection of you and SAFCO, the review must take place in the presence of your supervisor. You will not be allowed to make copies of any information contained in your file, unless the Company is required to allow such copies under state law or court order.

It is important to remember to keep your electronic file in the payroll system up-to-date with any changes. These types of changes include:

- Name changes: (e.g., getting married, etc.)
- Marital status changes and number of dependents (these can affect your benefits and taxes)
- Beneficiary designations for SAFCO's insurance and 401(k) plans
- Files for terminated team members are retained in an electronic format according to SAFCO's record retention policy.

Many of the file changes that may be required over time can be made through the payroll system's self-service functionality. For those changes that cannot, a signed *PAF* must be submitted to the Human Resources Department with documentation of the change.

EMPLOYMENT SEPARATIONS

In the event that you choose to resign from your position, we ask that you give us at least two weeks' notice to find a replacement. You must provide and complete a full notice in order to be considered in good standing with the Company at the time of your de-

parture. SAFCO expects you to take care of all your outstanding Company accounts at that time. Note that the supervisor, at their discretion, may elect but is not required to have a terminating team member work through their notice period. In either event, the resigning team member will only be paid for actual time worked.

If a team member resigns, is involuntarily terminated, or fails to return to work ("job abandonment"), their paycheck will be available at the next regularly-scheduled pay date, unless specified by state law. SAFCO will mail the live paycheck via regular mail to their last known home address. This paycheck will always be a manual check and not a direct deposit.

Final paychecks include all wages due and wages not previously paid minus authorized and otherwise permissible deductions (e.g., uniforms). Note that a team member's signature on the *Team Member Handbook Signature Page* authorizes SAFCO, upon employment termination, to deduct any debts owed to the Company from their final paycheck, except where prohibited by state law.

SAFCO will electronically conduct exit interviews for team members who leave SAFCO. This survey is anonymous and is conducted electronically via an e-mail link sent to the former team member's home e-mail address. The Human Resources Department is responsible for informing exiting team members of this process on their last day of work.

HR HELPDESK

To ensure a high level of customer service and a prompt response to your HR needs, the Human Resources Department is moving to a new HR Helpdesk format to process your requests for assistance. The HR Helpdesk is comprised of both SAFCO team members and external experts who act as the primary point of contact. They respond to HR questions via e-mail and phone, offering solutions to problems or passing on the questions to the person who can best provide solutions.

This service is also available to the dependents of SAFCO team members.

SAFCO

SUB-PRIME AUTO FINANCE



YOUR HOURS AND



WORKING HOURS

The standard work week varies. It is determined by your department or location supervisor and is based on business demands at your particular location. Your success as a team member depends in part on your being available to work the days and hours determined by your supervisor, and being reliable in your attendance.

LUNCH AND BREAKS

Team members who work six or more hours a day are eligible for a 30-minute unpaid lunch break after four hours of work. Other breaks and rest periods are established by your supervisor. See your supervisor for specific details.

ABSENTIEM AND TARDINESS

Each of our team members plays an important role in completing the day's work. Absenteeism or tardiness, even for good reasons, can disrupt our operations and interfere with our ability to satisfy our customers' needs.

If, for any reason, you are going to be late, or unexpectedly absent from work, you must personally notify your supervisor or the callout line before your shift is scheduled to begin. This will allow your supervisor time to make arrangements for your workload to be handled during your absence. Additionally, if the absence is due to illness, SAFCO reserves the right to require appropriate medical documentation.



Unless it is impossible for you to call, you **must** personally speak with your supervisor or the callout line. Simply texting, leaving a voicemail, or sending an e-mail is **not** acceptable. This way you can be sure that SAFCO has received notification, and it gives your supervisor an opportunity to ask you questions about your workload for the day so they can make other arrangements. When a valid emergency prevents advance notice of an absence, you or a family member should contact your supervisor as soon as practical.

Should you fail to contact your supervisor, that scheduled workday will be recorded as a "no call/no show." Furthermore, team members who do not call in or show up for work for three consecutive days may be considered to have voluntarily terminated their employment with the Company.



TIME OFF FROM WORK

PAID TIME OFF

Team members who are actively at work 30 or more hours per week are eligible for Company-paid time off from work. With their supervisor's approval via a payroll system time off request, new hires and rehires are eligible to use their paid time off benefits immediately, as outlined in the following sections.



SAFCO does not offer unpaid time off (other than the leave of absence outlined in this *Handbook*) when a team member has exhausted their allotment of paid time off. Team members who require additional time off after their allotment is used up are subject to disci-



PTO BANK

SAFCO utilizes a Paid Time Off Bank (“PTO”) to provide regular, full-time team members with an entitlement of days away from work with pay. Paid Time Off (“PTO”) bank days may be used for vacation, personal time, illness, or for time to spend on personal pursuits. PTO must be scheduled in advance through the Paychex Time and Attendance module and approved by your supervisor, except in cases of illness or emergency.

Eligibility

Team members who are actively at work 30 or more hours per week are eligible for Company-paid time off from work. With their supervisor’s written approval, new hires and rehires are eligible to use their paid time off benefits immediately upon hire, as outlined in the following sections.



SAFCO does not offer unpaid time off when a team member has exhausted their allotment of paid time off.

If Your Status Changes

Team members who change status from part-time to full-time are immediately eligible for paid

PTO Accrual	Completed Years of Employment	Ac-
 <p>PTO is earned on the first day of each month following your date of employ-</p>	Up to and including year 2	14 days (1.16 days per month)
	Beginning year 3	17 days (1.42 days per month)

Requesting PTO

All PTO requests must be made through the payroll system Time and Attendance Module, then approved by the immediate supervisor. Perform the following to request time off:



STEP

1

All team members must request time off through payroll system’s Time and Attendance Module at least two weeks in advance. This entry **must be made by the**



STEP

2

The team member’s immediate supervisor will review the request electronically, and either approve or decline the



STEP

3

If the approved time is taken, you will receive PTO pay with your regular paycheck on the scheduled pay period.

Key Reminders:

- Not more than two weeks of vacation may be used at one time, unless authorized by your supervisor in writing and with substantial advance planning.
- The Company reserves the right to deny the time off request if overriding operational considerations conflict with a team member’s plans.
- In the event of an unexpected absence, time off must also be requested through The Time and Attendance module once the team member has returned to work.
- Hourly team members may use vacation and personal time in increments of four or eight hours, paid at their hourly rate. Salaried team members must use PTO time in eight hour increments.

Note the following additional PTO processes:

- If you use more PTO days by year end than you have earned, you must repay the Company for the deficit in cash (may be payroll deducted).
- Pay in lieu of time off is not permitted.
- If a Company holiday falls within a PTO week, it will be treated as a holiday and will not be deducted from your accrued PTO time.
- If your employment is voluntarily or involuntarily terminated and you are in good standing with the Company, you will be paid for your accrued but unused PTO, including any time that was rolled over from the previous year. If you are terminated for cause or do not provide a full notice when you voluntarily leave (not in good standing), you will not be paid out for your unused PTO days. If you use PTO days before they are accrued and then your employment is terminated, these days will be considered monies due to SAFCO and will be deducted from your final paycheck (your final paycheck will not fall below minimum wage).
- Once a team member has given notice to their supervisor and resigned from the Company, the team member cannot submit for PTO days during their remaining time with the Company (their notice period).
- If a team member uses an unscheduled PTO day before or after the holiday, they are eligible for holiday pay only in the instance in which the team member provides a doctor's note (at the supervisor's discretion).

Carryover of Paid Time Off

Earned but unused PTO may be carried over into the next year, up to a maximum of five days. Rollover days not used by June 30th of the following year will be forfeited.

HOLIDAYS

SAFCO provides the following scheduled holidays for its locations:

- New Year's Day
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day
- Christmas Day



This is a recommended holiday schedule. The actual schedule for your facility will be determined by your facility's leadership and will be based on the needs of our business.



If a team member is using a sick day before or after the holiday, and was scheduled to work on this day, the team member is eligible for holiday pay only in the instance in which the team member provides a doctor's note (at the supervisor's discretion).

LEAVES OF ABSENCE

Leaves of absence will be considered for legally-required absences (i.e. FMLA). Please contact the Human Resources Department for more information on the procedure for requesting any type of leave of absence, the duration of the leave, the timing of the leave, and the required documentation. Vacation time is not accrued while on a leave of absence.

SAFCO does not offer any type of unpaid leave other than the leave outlined here.

Leave's Effect on Pay

Except to the extent that other paid leave is substituted for family care or medical leave, family care and medical leave is **unpaid**. Team members must substitute personal and/or sick leave for all family care and medical leaves. After all personal leave and/or sick leave is used, or on the 14th day following the onset of the team member's own serious health condition, a team member taking a medical leave may receive short-term disability benefits pursuant to the Company's Short-Term Disability Plan.

Requesting Leave

All leaves must be requested in writing. For foreseeable events, (e.g., pregnancy, adoption, etc.), the team member must provide 30 calendar days advance written notice to the Human Resources Department as soon as they learn of the need for the leave. Ordinarily, the team member must provide notification no later than one to two working days after they learn of the need for the leave. If the leave is requested in connection with a planned, non-emergency medical treatment, the team member may be requested to reschedule the treatment so as to minimize disruption to SAFCO's busi-

ness.

If a team member fails to provide the required 30-day advance written notice for foreseeable events without any reasonable excuse for the delay, the Company reserves the right to delay the taking of the leave until at least 30 days after the date the team member provides notice of the need for family care or medical leave.

Team members who are on FMLA leave, whether intermittent or full time, will be asked to recertify their leave every six months.

While On Leave

During the period(s) of leave, team members are responsible for following SAFCO's callout policies. In addition, time off that is taken as unpaid FMLA leave may not be made up (e.g., stay late on the following day to work additional hours over what was scheduled, etc.) at a later date. They must also contact their direct supervisor every 10 days notifying them of their intent to return.

To ensure an accurate count of FMLA time available, the team member or their direct supervisor must note the time taken each pay period using the "Leave" status in the payroll system.

Domestic and Sexual Violence Leave

SAFCO provides up to three days of unpaid leave (up to 30 unpaid days for team members who reside in Miami-Dade County) for team members to address issues related to domestic or sexual violence to the team member or a household member. The team member must request the leave in writing and provide certification of victim status.

Jury Duty Leave

To assist team members with the performance of their civic duties, the Company will excuse from work all team members who are summoned to serve on jury, or who are summoned to serve as a witness in a trial. If a team member is called for jury duty, or to serve as a witness, the team member must immediately provide a copy of the summons to leadership so SAFCO can plan the department's work with as little disruption as possible.

The Company will pay the team member's base pay, excluding mileage or meal allowances for each day of jury service, up to a maximum of three days (five days for those team members who work in Broward County, Florida). Team members who are released from services before the end of their regularly-scheduled shift, or who are not asked to serve on a jury panel, must call their supervisor as soon as possible and re-

port to work if requested.

Bereavement Leave

A team member who has completed their 90-day introductory employment period will be granted up to three days of paid time off from regularly-scheduled work per incident to attend the funeral and attend to other matters upon the death of a family member. Team members who are not eligible for paid bereavement leave will be granted up to three days unpaid bereavement leave upon the death of a family member. For purposes of this policy, the term "family member" is defined as a spouse, children, unborn child, stepchildren, parents, brother or sister, stepparents, in-laws, grandparents, grandchildren, aunts or uncles, or first cousins.

A team member who is notified of a death in their family while at work will be paid for the remainder of the scheduled hours that day. Their bereavement leave will not commence until the next regularly-scheduled workday. Team members may be required to provide a copy of an obituary or other appropriate documentation of the death and proof of the relationship to the deceased.



YOUR COMPENSATION



OUR PHILOSOPHY

Our compensation philosophy has three primary objectives:

1. Attract a qualified, diverse workforce through a competitive compensation program.
2. Retain and motivate a qualified, diverse workforce by recognizing and rewarding individual and group achievement, contribution, and excellence.
3. Provide a non-discriminatory merit-based compensation program.

To accomplish these objectives, we have developed a compensation program that establishes and maintains competitive salary levels within relevant markets and available resources, and which is consistent with job content, responsibilities, and requirements.



ments.

Nothing in this policy is intended to prohibit or discourage our team members (other than statutory supervisors) from communi-

PAY PERIOD

Unless otherwise agreed upon, pay for team members is distributed on a bi-weekly basis to cover the hours worked during the previous pay period. Each pay period begins on Saturday and ends on Friday, with checks delivered bi-weekly on the following Friday. If you receive a commission or bonus payment as part of your compensation, those payments will be made on the second pay period of the month following the month in which the bonuses/commissions were earned.

PAYROLL PROCESSING

SAFCO uses a standard payroll system to serve its payroll needs. This cloud-based program provides our Company with a comprehensive solution to support our online payroll, HR, and time and attendance tasks, including:

- Standard online payroll processing
- Standard human resources activities
- Team member self-service functionality

This system encourages team members to manage their personal information by providing them with the **self service** options to update their address, bank accounts, tax withholdings, and other information. It also provides the means to punch in and out for the day, request paid time off, and retrieve their annual *W-2* statement.

To access this system, you must create an account. Additional training on the program is available within the application.

PAY CHECKS

We  strongly encourage our team members to take advantage of the direct deposit option for receiving your pay. This feature provides instant access to your funds without having to make a trip to the bank. If you are out of town, or unable to get to the bank on time, your money will be there for you through direct deposit. If you do not have a bank account but would like one, SAFCO will provide assistance through one of our financial partners.

If you would like to enroll in direct deposit, make changes to your tax withholdings, or print out your pay stubs, you can do so at any time through the payroll system.

SAFCO also encourages you to review your pay records very carefully with each payroll. It includes important information about your payroll deductions, including your tax filing status with the number of exemptions you are claiming, the home address listed for you, as well as 401(k) and other benefit contributions.

Remember that with rare exception, **all** team members are subject to tax withholding on wages earned. Your taxes are calculated based on the information you provided on your *Form W-4*. Note that if you receive a live check, pay checks will not be given to any person other than the team member without written authorization from the team member. The HR Helpdesk if you have any questions or concerns about the information found on your paycheck.

HOURS OF WORK AND OVERTIME PAY

Your business unit may periodically schedule overtime hours, evening hours, or weekend work in order to meet business needs; however, overtime is not guaranteed and should not be expected on an ongoing basis. All overtime worked must have prior approval from your direct supervisor.

Team members classified as non-exempt are eligible for overtime pay when they work more than 40 hours in one work week (Saturday through Friday). Overtime hours are paid at one-and-one-half times your regular rate of pay (“time-and-a-half”).

Company-paid time off from work (e.g., vacation, holiday, and sick days, etc.), do not count as “hours worked” for the purposes of determining your eligibility for overtime pay. Overtime practices may vary due to differences in state laws or other reasons. Contact your supervisor or the Human Resources Department if you have questions regarding your overtime pay status.

LOANS AND PAY ADVANCES

We believe that loans to team members or advances of pay do little to help them meet their financial obligations. At the same time, we may be put in a very difficult and unpleasant position if we are required to collect on a past-due loan. For these reasons, we do not make loans or pay advances to team members.

GARNISHMENTS

SAFCO honors wage garnishments as required by law. Team members will be immediately notified by the Human Resources Department upon receipt of a court order, or state or IRS directive. Any questions related to wage garnishments should be directed to the HR Helpdesk.



YOUR BENEFITS



PLAN OVERVIEW

SAFCO provides excellent benefits and savings programs for eligible team members. Benefits are an important and valuable part of your total compensation package, and are designed to assist you in achieving a measure of financial security and protection. Note the following:

- Full-time team members are eligible to participate in all benefits.
- Part-time team members are eligible to participate in the 401(k) Plan.

SAFCO administers its various benefits programs through the payroll system’s benefits administration module, allowing the Company to take advantage of the agency’s high-quality benefits and tools combined with their deep expertise in benefits, plan management, administration, and communication.

Additional benefits include:

- Basic Life and Accidental Death and Dismemberment
- Disability Insurance

The benefits administration module enables SAFCO to:

- Offer affordable benefits, including minimum essential coverage.
- Provide best-in-class benefits aligned with state and federal exchanges.
- Empower our team members, encouraging investment in health care decisions.
- Reduce administrative burden and integrate processes to increase efficiencies.
- Help team members choose the right benefits for themselves and their dependents.

Each team member can access Benetrac right through Paychex. Contact the Human Resources Department if you need assistance with the Benetrac system.

FULL TIME TEAM MEMBER BENEFITS

All full-time team members are eligible for the Company's benefits package. Coverage normally begins on the first day of the month following 30 days of full-time employment. Generally, once you sign up for or waive coverage, you may not change this election during a calendar year. Benefits include:

- Medical, dental, vision, and prescription drug coverage
- Term life insurance
- SAFCO-paid basic life, short-term and long term disability, and AD&D coverage
- Prepaid legal plan
- Education assistance
- Health advocate
- Employee Assistance Program
- 401(k) Plan
- Voluntary benefits from Colonial Life
- Perks and discount offers that include a Pre-Paid Legal Plan, discounted fitness membership, AAA auto club, discounted Tri-Rail pass, and various discounts via Wells Fargo Bank.

If there is a change in your family status (e.g., marriage or divorce, birth or adoption of a child, gain or loss of other coverage, etc.), you may be able to enroll or change your coverage within 30 days after the status change. You are responsible for notifying SAFCO and completing the necessary paperwork to document the change.

EDUCATION ASSISTANCE

The Education Assistance Program encourages team members to develop their knowledge and skills related to their current or future career goals with the Company. This program applies to all **job-related** study courses offered by recognized, regionally accredited educational institutions, including:

- High school GED courses
- Bachelor's and Master's Degree courses
- Continuing professional education

SAFCO makes no guarantee that participation in a formal education program will entitle the team member to automatic advancement, a different job assignment, or pay increases. To be eligible, the team member must be a full-time team member who has completed at least one year of continuous, full time employment with the Company. An *Education Assistance Application* must also be submitted for approval to your immediate supervisor and the Human Resources Department 30 days prior to enrolling in any program.

401(k) PLAN

Everyone will eventually retire. SAFCO believes that contributing to a 401(k) Plan is one of the best ways to save for your retirement. Your money grows tax deferred through a variety of investment options. SAFCO's Plan may also include a discretionary match that helps your retirement nest egg grow even faster.

Unless "opting out" or "opting up," new team members will be automatically enrolled at 2% of their annual gross income. Thereafter, your contribution will be automatically increased by 1% each year on your service anniversary, up to a maximum automatic increase of 5%. Note that you are free to contribute up to the IRS maximum amount each year (check with the Human Resources Department for the most current limit).

In addition, the Company makes a professional retirement plan advisor available to you as part of the Plan. Benefits of an advisor include:

- Focus on improving outcomes
- Retirement readiness
- Ease of Plan administration

SAFCO also provides the services of a professional Plan advisor. They can assist you with investment decisions and retirement planning. This service is available to team members free of charge.



HEALTH AND SAFETY



SUBSTANCE ABUSE

SAFCO is committed to promoting the highest standard of safety at all locations at all of its subsidiaries. We believe that substance abuse not only affects job performance, but could also undermine our operations. By identifying and preventing substance abuse, the safety, health, and well-being of our team members and customers will be maintained.

SAFCO prohibits the possession, use, distribution, or sale, of controlled substances and alcoholic beverages by all its team members on SAFCO premises (e.g., the parking lots, building common areas, offsite events, etc.), or while operating a SAFCO

-  owned vehicle or Company equipment at any time or while operating any vehicle on Company business, or while conducting any type of Company-related business. SAFCO also prohibits reporting to work with the presence of controlled substances or alcoholic beverages in your system.

Alcohol may be consumed at a Company-sponsored function or on Company property with the approval of SAFCO's CEO.

Team members who violate this policy are subject to disciplinary action, up to and including unpaid disciplinary suspension and/or the termination of their employment. Team members who refuse to submit to the screening or to a search of their person and/or personal property will be immediately terminated. In addition, team members who are involved in a work-related accident and test positive for an illegal substance will forfeit their eligibility for medical and indemnification benefits under the *Worker's Compensation Act*. For more information on the policy, speak with your supervisor.

SMOKE-FREE WORKPLACE

Smoking of any type is prohibited at SAFCO facilities. This policy includes both tobacco products as well as e-cigarettes. Flammable and combustible materials contained throughout our facilities, along with many state and local laws, prevent team members from smoking within Company buildings and offices. Additionally, smoking inside the workplace can be disruptive to our general operations. Each facility has a designated area, outside and away from customers and co-workers, for team members who wish to smoke.



SAFCO believes that the use of tobacco products is harmful to a person's health. To encourage healthy behavior, the Company charges team members who use tobacco products an extra "tobacco use fee" on their insurance premiums. To avoid this fee, SAFCO does provide smoking cessation assistance to those team members who attempt to quit.

HOUSEKEEPING

Team members are required to maintain their individual work areas in a clean, uncluttered, and tidy condition. Good housekeeping practices help prevent accidents and keep the Company in compliance with OSHA policies and procedures.

In addition, SAFCO-furnished facilities (e.g., lunch or break rooms) should be treated as community living spaces, with each team member sharing the responsibility for keeping the area clean.

WORKER'S COMPENSATION

Our goal is to protect our team members and send them home safe every day, as well as to provide customers with a safe environment. Should you become injured on the job, no matter how slight, it is your responsibility to immediately report the incident to your supervisor, who will in turn notify the Human Resources Department. That department will work with the injured team member to secure the appropriate medical treatment, send them for the post-incident substance abuse screening, and open a claim with the worker's compensation carrier.

may be required to provide proof of insurance to their supervisor.

WORKING AFTER HOURS

In the interest of personal safety, you must notify your immediate supervisor if you are going to be working at a SAFCO location either before or after normal business hours. Tell them what you will be working on and the approximate times you will be there. This notice will help us ensure a safe environment and react to any unforeseen circumstance that may occur. In addition, be sure that the facility is properly secured (i.e., locked and alarmed) before leaving.

RENTAL VEHICLES

If a team member is involved in a vehicle accident or any vehicle-related incident in a Company-rented or owned vehicle, they are responsible for reporting it to their supervisor within one business day of the incident.

Team members must report any traffic citations or violations received in a Company vehicle to their supervisor within 24 hours, and promptly pay the fine and/or penalty. They must also immediately notify SAFCO in the event that their *Driver's License* is suspended or revoked for any reason.



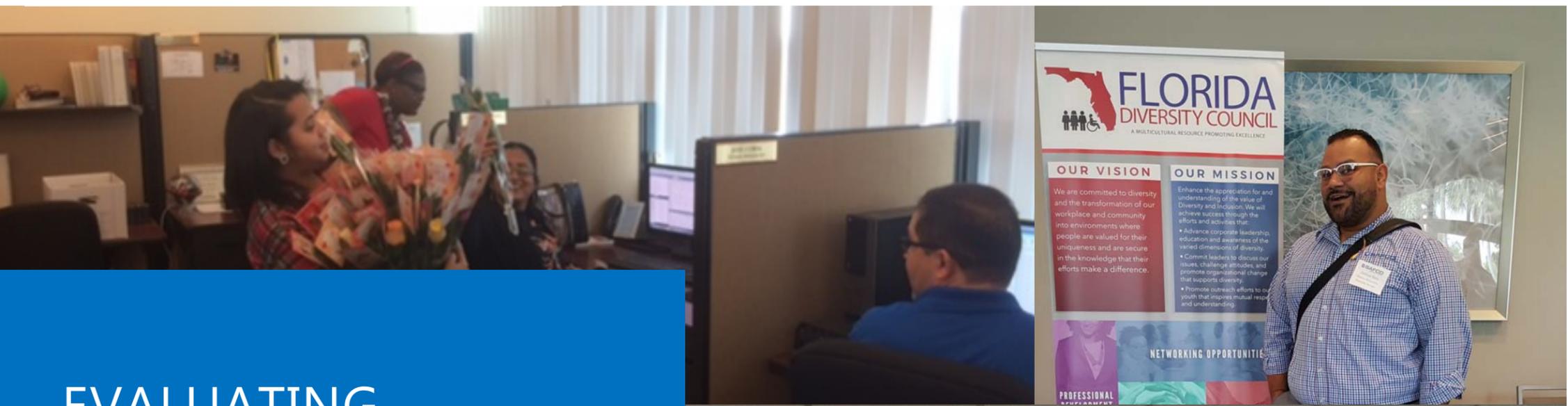
PERSONAL VEHICLES

Team members will be reimbursed on a per-mile basis that is competitive with IRS-specified mileage guidelines, plus tolls and parking fees. The per-mile reimbursement amount is intended to cover all expenses of operating a vehicle, including fuel, depreciation, auto insurance, repairs, and other miscellaneous charges. No other specific costs related to a personal automobile are reimbursable.

Team members will only be reimbursed for incremental mileage (i.e., mileage in excess of the normal commute to and from your work location). Business-related mileage must be logged as it occurs, supported by proper documentation in accordance with IRS regulations. This documentation is necessary to protect the traveler from unnecessary audit risk.

In addition, it is recommended that team members who use personal vehicles on business carry liability insurance coverage in the amounts of \$100,000 per person, \$300,000 per occurrence. The Company recommends that the team member carry a minimum of \$10,000 in property damage insurance as well. In the event of a major accident while on business, liability claims are assessed first against the team member's personal insurance. Should damage awards exceed those limits, SAFCO's coverage would apply.

Team members who use their own vehicles for business purposes



EVALUATING YOUR JOB



PERFORMANCE DEVELOPMENT

SAFCO believes that every team member should receive objective, accurate feedback regarding their job performance. Quarterly performance conversations are one of the tools that assist team members and leadership in achieving key results in team member performance, as well as giving the team member the opportunity to communicate openly with leadership regarding



their professional goals. You should expect to receive a formal performance appraisal from your supervisor every quarter throughout your career with the Company.

Quarterly performance conversations are administered through the payroll system.

PERSONNEL RECORDS

SAFCO maintains certain records on each team member that are directly related to their employment with the Company. This personnel file includes any information relating to your application, performance evaluations, disciplinary actions, salary changes,

If you would like to review your personnel file, contact the Human Resources Department to schedule an appointment. They will set up the appointment with your supervisor. For the mutual protection of you and SAFCO, the review must take place in the presence of your supervisor. You will not be allowed to make copies of any information contained in your file, unless the Company is required to allow such copies under state law or court order.

It is important to remember to keep your file up-to-date with any changes. These types of changes include:



- Name changes: (e.g., getting married, etc.)

In order for us to process a name change in the payroll system, you will need to provide a copy of the updated *Social Security Card*.

- Marital status changes and number of dependents

Files for terminated team members are retained in an electronic format according to SAFCO's "Record Retention" Policy.

Many of the file changes that may be required over time can be made by the team member through the payroll system's self-service functionality. For those changes that cannot be made this way, signed documentation is required.

SAFCO
SUB-PRIME AUTO FINANCE

CORPORATE ADDRESS
6700 N. Andrews Avenue
Suite 500



THE GREAT **RESULTS**
COME FROM GREAT **PEOPLE**

