

## Standards of Conduct Policy

### Purpose

The Standards of Conduct Policy is designed to detect and prevent unethical conduct and violations of laws/regulations at Landstar Title Agency, Inc.

### Policy

All Landstar Title Agency, Inc. employees are responsible for following the standards defined in this document.

### Attendance

Each employee is required to be present and ready to work on time from the start to the end of each workday, according to his or her work schedule assigned by management. If an employee is unable to report to work for any reason, he or she is required to inform the manager or designee no later than 30 minutes from the commencement of the scheduled start time, unless otherwise directed by management. An employee must also notify the manager or designee as soon as possible if he or she needs to leave for any reason before the conclusion of the scheduled workday.

If an employee fails to report to work without proper notice for 3 consecutive scheduled workdays, Landstar Title Agency, Inc. will presume the employee has voluntarily resigned and the employee will be terminated from employment, unless state or local law defines a longer period prior to termination.

### Attire and Personal Representation

All Landstar Title Agency, Inc. locations observe a business casual dress code unless otherwise directed by management. With appropriate notice, professional business attire may be required (for example, for special events or customer meetings). Employee attire must project an appropriate image for conducting business with customers. Management reserves the right to determine the appropriateness of the attire and personal representation.

Each employee must maintain proper hygiene and utilize good judgment in determining dress and appearance. If an employee's personal representation poses an issue (for example, inappropriate attire, body odor, or offensive perfume/cologne), management may address the concerns with the employee. If an employee is asked to leave work to address a personal representation issue, time lost is not considered paid work time.

### Confidentiality

Each employee is responsible for using his or her best judgment to safeguard and manage confidential information at all times. Examples of appropriate behavior related to protecting confidential information include, but are not limited to

- Only disclosing confidential information to individuals with an authorized business need for access (for example, to perform job responsibilities)
- Holding conversations including sensitive information in enclosed areas
- Using sealed envelopes to mail confidential information with acknowledgement of receipt requested
- Disposing of confidential information through appropriate method (for example, shredding printed documents and wiping computer media) when no longer needed to support operations and/or to meet state, legal, or tax requirements

## **Discrimination**

Each employee is required to abide by all state and federal equal employment opportunity regulations.

## **Harassment**

Harassment is prohibited and will not be tolerated in the workplace or in any work-related setting including, but not limited to

- Business trips
- Business meetings
- Business-related social events

Harassment may consist of conduct including, but not limited to verbal, non-verbal, or physical conduct designed to threaten, intimidate, or coerce other employees to the extent that the conduct is regarded as unwelcome, impairs the employee's ability to perform his or her job, or creates a hostile work environment. Examples of harassing conduct include offensive epithets; slurs or negative stereotyping; threatening, intimidating, or hostile acts; and jokes or written/graphic material that denigrates or shows hostility or dislike toward an individual or group.

## **Sexual Harassment**

It is against Landstar Title Agency, Inc. policy for any employee, male or female, to sexually harass another employee by making unwelcome sexual advances or making sexual favors or other verbal or physical conduct of a sexual nature as a condition of an employee's continued employment; making submission to or rejections of such conduct the basis for employment decisions affecting the employee; or creating an intimidating, hostile, or offensive work environment by such conduct.

## **Misconduct**

Violation of any policy at Landstar Title Agency, Inc. (whether stated herein or provided elsewhere by Landstar Title Agency, Inc.) is considered misconduct. Although it is impossible to identify every possible instance of misconduct, the following is a partial list of infractions that Landstar Title Agency, Inc. considers misconduct:

- Unprofessional or otherwise inappropriate behavior
- Falsification of any documentation required for employment including, but not limited to, employment applications and time reporting records (one's own or another's)
- Theft, fraud, gambling, or carrying prohibited weapons or explosives as defined in the Weapons section of this document, or violation of criminal laws on company premises
- Interfering with the performance of fellow employees
- Falsification of any claims of inappropriate conduct
- Insubordination or refusal to comply with instructions or failure to perform reasonable duties as assigned
- Excessive unauthorized absenteeism or abuse of attendance, paid time off, or leave of absences
- Unauthorized or improper use of business expenses (for example, reimbursement or Landstar Title Agency, Inc. -issued purchasing card)
- Failure to adhere to any rules designated by management regarding pets (other than service animals), dependents, or other visitors in the work place
- Impersonation of any person or entity including, but not limited to, a Landstar Title Agency, Inc. employee or officer, or false statement or misrepresentation of an affiliation with a person or entity
- Representation of personal opinions as those of Landstar Title Agency, Inc. or purporting to represent Landstar Title Agency, Inc. without explicit authorization

- Failure to comply with Landstar Title Agency, Inc. procedures or standards

## **Retaliation**

An employee may not retaliate or attempt to retaliate against an employee who has, or who is associated with an employee who has

- Reported a suspected or alleged misuse of company property or assets at Landstar Title Agency, Inc.
- Appeared as a witness, cooperated in, acted as investigator, or otherwise supported the investigation of any complaint against the company
- Filed or made a good faith complaint of alleged discrimination, harassment, sexual harassment, or violations of other federal, state, or local laws

## **Reporting Incidents and Potential Violations**

Landstar Title Agency, Inc. encourages the reporting of all perceived incidents of discrimination, harassment, misconduct, or retaliation, regardless of the offender's identity or position. All reports of suspected incidents shall be taken seriously and investigated. To the extent practicable, Landstar Title Agency, Inc. will keep reports confidential; however, absolute confidentiality is not promised and cannot be assured.

Any employee or other individual who believes he or she has been subjected to, witnessed, or made aware of discrimination, harassment, sexual harassment, misconduct, or retaliation should immediately report the incident to management. Complaints may be anonymous, if so preferred; however, if the reporting person is not identified, the Landstar Title Agency, Inc. might not be able to respond appropriately to the reported concern. There is no penalty for reporting an alleged incident in good faith.

Any employee who has been found by the Landstar Title Agency, Inc. to have engaged in conduct inconsistent with policy will be subject to disciplinary and/or legal actions, up to and including termination.

## **Media Inquiries and Press Releases**

Requests from media outlets should be immediately forwarded to the management. Under management discretion, officers of the company may have a direct relationship with local publications about positive community issues, articles, and advertisements where employees have assurance that adverse issues, claims, or investigations of the company or the closing or real estate industries are not involved.

All press releases must be managed by Landstar Title Agency, Inc. and approved by the appropriate parties. All information released to the public must meet the standards for Landstar Title Agency, Inc. strategies, management philosophies, style, and material concerns.

## **Outside Employment**

Outside employment requires prior written management approval. Outside employment must not interfere with job performance or efficiency, involve the use of Landstar Title Agency, Inc. resources or time, pose a conflict of interest, or in any way harm the business or reputation of Landstar Title Agency, Inc..

## **Security, Access, and Identification**

Access needs for each employee are determined by management. If provided, employees are required to wear security badges while on work premises for identification and/or access purposes. Employees must follow any precautions provided to ensure security badges and Landstar Title Agency, Inc. keys are protected and secure at all times. Where available, access may be monitored by card readers, video cameras, or other monitoring devices.

## Smoking

Smoking is not allowed in any Landstar Title Agency, Inc. buildings. Employees may only smoke in designated areas and must adhere to local and state regulations regarding smoking.

## Social Media

While using social media outlets during or outside of work hours and on Landstar Title Agency, Inc. or non-Landstar Title Agency, Inc. equipment, employees must comply with all Landstar Title Agency, Inc. policies.

These actions are permitted only with explicit prior written permission from management and Landstar Title Agency, Inc. Marketing:

- Maintaining or posting social media content that implies Landstar Title Agency, Inc. sponsorship or support
- Using Landstar Title Agency, Inc. time, facilities, resources, or supplies to maintain or post content to social media outlets
- Maintaining or posting any logos or trademarks of Landstar Title Agency, Inc. or related entities on social media outlets

Actions of prohibited behaviors related to the use of social media include, but are not limited to

- Concealing or attempting to conceal one's identity, such as through the use of an alias, while making any reference to Landstar Title Agency, Inc., its Officers, members of the Board of Directors, related entities, employees, or clients
- Expressing views on behalf of Landstar Title Agency, Inc., unless the content is provided verbatim from materials approved by the Landstar Title Agency, Inc. for that purpose

Management reserves the right to require an employee to cease maintaining or posting to any social media outlet containing content in any way associated with Landstar Title Agency, Inc. that it deems inappropriate.

## Solicitation

An employee may not solicit for personal causes or events or distribute non-work-related information during work time or using company resources without prior management approval. Each employee should avoid making any other employee feel uncomfortable or compelled to participate or contribute through solicitation, and no employee should feel obligated to participate in these efforts. In addition, information posted on Landstar Title Agency, Inc. bulletin boards, including electronic bulletins, must be of interest to the workplace, appropriate, limited to designated areas, and approved by management.

## Phone and Mobile Device Usage

Each employee must limit phone usage for personal reasons (for example, calling, texting, emailing, and Web browsing) during working hours and comply with all applicable rules established by management. Whenever possible, personal use should be restricted to meal or rest periods. On work premises, disruptive ringers that may be overheard by customers or employees must not be used and professionalism must be maintained while on calls. Using Landstar Title Agency, Inc. landlines to make personal long-distances calls is prohibited.

While driving a vehicle, employees are discouraged from using a mobile device (for example, calling, texting, emailing, and Web browsing) to conduct Landstar Title Agency, Inc. business, and are responsible for using their best judgment in compliance with state and local laws. For safety reasons, an employee should pull off the road to a safe location before taking or making a call, retrieving or sending messages, and reading or responding to e-mails.

## Camera and Video Recorder Usage

In restricted-access or other areas where there is an expectation of privacy (such as restrooms), every employee is prohibited from using a camera or video recorder including those available as mobile phone features. Unauthorized or unwelcome recording or photography of any Landstar Title Agency, Inc. business, information or individuals is prohibited on work premises or work events.

Video cameras may be operated on work premises to help ensure the safety and security of individuals and business operations.

## Weapons

Consistent with applicable law, every employee is prohibited from carrying a weapon during the course of performing their jobs, whether or not they are on Landstar Title Agency, Inc. property. This applies even if employees are licensed to carry a handgun. Furthermore, this policy prohibits weapons at any company-sponsored function such as a party or picnic.

With approval of the highest ranking official of Landstar Title Agency, Inc., management may grant an exception to an employee to carry a weapon while working.

Any form of weapon or explosive restricted under federal, state, or local law is prohibited. Where required by law, Landstar Title Agency, Inc. permits storage of firearms in personal vehicles.

An employee should contact his or her manager or Landstar Title Agency, Inc. Human Resources with any questions about whether an item is considered a weapon under this policy. An employee is expected to verify ahead of time that an item is not defined as a weapon under this policy before having it in his or her possession while working, and the employee is solely responsible for any prohibited item.

## Violation of Policy

Failure to adhere to all requirements stipulated in this policy and all related documents may result in disciplinary actions, up to and including

- Immediate removal of any applicable hardware/software/access to the Landstar Title Agency, Inc. computer network or business systems
- Formally reporting the incident to Landstar Title Agency, Inc. senior management
- Termination of employment
- Any other action deemed necessary by Landstar Title Agency, Inc. senior management

## Review

Landstar Title Agency, Inc. has voluntarily adopted this policy for its sole and exclusive use. This policy and all related documents will be reviewed annually or as needed based on prevailing business conditions.

## Approved

Kenneth Warner, Esq., Vice President and Senior Counsel

Version Number	Revised Date	Effective Date	Approved By	Brief Change Summary