EFFECTIVE DATE: 7/1/25

POLICY TITLE:

Holiday Benefit

To be reviewed every three years by:
Executive Leadership Team

REVIEW BY: 7/1/28

PURPOSE

The purpose of this Policy is to set forth when Trinity Health Corporation ("Trinity Health") and its Ministries and Subsidiaries will provide Employees paid time away from work when a recognized holiday occurs. Trinity Health is committed to administering this Policy in accordance with its Mission, Core Values, and commitment to the Common Good.

POLICY

Application of Policy

This Policy generally applies to all regular full-time and regular part-time, benefits-eligible Employees, unless specifically excluded by the terms of a collective bargaining agreement or the Employees have employment contracts or agreements that provide for different holiday benefits. If coverage under this Policy for additional Employees is required by applicable law, this Policy also applies to the Employees for whom coverage is required. Benefits eligibility for purposes of this Policy, including regular full-time and regular part-time employment status for the Employer, are determined in accordance with Human Resources Ministry-Wide Procedure No. 1031 (Eligibility for Coverage Under the Trinity Health Corporation Welfare Benefit Plan).

Recognized Holidays

A holiday benefit under this Policy will be paid for the following recognized holidays:

- New Year's Day
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day
- Christmas Day
- Float Holiday (if applicable)

One of the following applies when a recognized holiday falls on a Saturday or Sunday, depending on the applicable timekeeping system:

- If the recognized holiday fall on a Saturday, it may be observed on the Friday before the holiday and, if a recognized holiday that falls on a Sunday, it may be observed on the Monday following the holiday; or
- The recognized holiday will be observed on the day it falls.

An Employee should contact the Employee's supervisor or manager regarding which of the above is applicable.

A "Float Holiday" is a single day during a calendar year that an Employee may elect to be treated as a paid holiday, subject to preapproval from the Employee's supervisor or manager. A Float Holiday is immediately available for use during the calendar year in which an Employee is hired, except that if the date of hire is on the last day of the calendar year, no Float Holiday is available in that calendar year. A Float Holiday must be taken on or before the last day of the calendar year (based on the applicable timekeeping system). If a Float Holiday is not used during the calendar year, then, except as may otherwise be required by applicable state law, it will be forfeited, not carried forward to a following calendar year, and not paid out. If required by applicable state law, an unused Float Holiday for a calendar year will be paid as soon as administratively practicable following either the end of the calendar year or, if applicable, the Employee's termination of employment during the calendar year. If an Employee terminates employment and is rehired by the Employer during the same calendar year, the Employee will not receive a second Float Holiday for that year if the Employee's first Float Holiday was used prior to, or paid out following, the Employee's termination of employment. Similarly, if an Employee transfers from a benefits-eligible position with an Employer to a non-benefits eligible position and then back to a benefits-eligible position with an Employer during the same calendar year, the Employee will not receive a second Float Holiday for that year if the Employee's first Float Holiday was used prior to, or paid out following, the first employment transfer.

A "Float Holiday" <u>may not</u>: (1) be used to compensate Employees for hours they were not scheduled to work or for the sole purpose of supplementing their regular wages; (2) be "split" and used for less than a full shift; or (3) be used as an Employee's final day of employment.

<u>Holiday Benefit Payment</u>

An Employee is eligible for the paid holiday benefit as of the Employee's date of hire by the Employer and there is no eligibility waiting period. A holiday benefit will be paid at the Employee's current base hourly rate of pay, exclusive of overtime, premium pay, shift differential, bonus, incentive pay, etc. If an Employee has multiple positions with the Employer, the holiday benefit will be paid in accordance with the primary position. A holiday benefit is applied on the day of the recognized holiday, including on the date a Float Holiday is elected by an Employee. A holiday benefit will be applied on the holiday regardless of whether the Employee calls out on the day before or after the holiday. Attendance issues will be managed in accordance with the applicable attendance policy.

An Employee will receive a holiday benefit for a recognized holiday based on the Employee's full-time equivalent (FTE) status as follows. For example:

FTE Status	Holiday Hours Per Day
1.0	8 (1.0 FTE x 8 hours)
0.9	7.2 (0.9 FTE x 8 hours)
0.6	4.8 (.06 FTE x 8 hours)

Non-Exempt Employees

Non-exempt Employees, **whether they work or do not work** on a recognized holiday under this Policy, will receive a holiday benefit for up to maximum of eight (8) hours in accordance with their FTE status. For example, a 1.0 FTE non-exempt Employee whose normally scheduled hours for a work day are not eight (8) hours (e.g., 10 hours), will receive eight (8) hours of holiday benefit pay for a holiday; a 0.9 FTE non-exempt Employee will receive seven and two tenths (7.2) hours of holiday benefit pay for a holiday; etc.[1]

With respect to a less than 1.0 FTE non-exempt Employee, if a recognized holiday under this Policy falls on a date the Employee is regularly scheduled to work, the Employee will receive a holiday benefit prorated based on the Employee's FTE status for that day. For example, if a 0.6 FTE non-exempt Employee normally works five (5) hours on a day that is a recognized holiday (not including a Float Holiday elected by the Employee), and the Employee works on the holiday, the Employee will receive five (5) hours of holiday pay and four and eight tenths (4.8) hours of holiday benefit pay for that day.

A non-exempt Employee may elect to supplement the Employee's holiday benefit for a recognized holiday with paid time off ("PTO"). For example, if a 0.6 FTE non-exempt Employee normally works five (5) hours on a day that is a recognized holiday (not including a Float Holiday elected by the Employee), and the Employee does not work on the holiday, the Employee will receive four and eight tenths (4.8) hours of holiday benefit pay for that day and may elect to supplement the additional two tenths (.2) of an hour with PTO.

Whether an Employee is exempt or non-exempt is determined in accordance with the Fair Labor Standards Act. Generally, a non-exempt Employee is an Employee who is paid on an hourly basis and an exempt Employee is an Employee who is paid on a salaried basis.

Exempt Employees

Exempt Employees will be provided a paid holiday benefit for a recognized holiday under this Policy for up to a maximum of eight (8) hours based on their FTE status. If a pay period includes a holiday, and if an exempt Employee's worked hours and paid holiday benefit hours in the pay period are less than the Employee's FTE status, the Employee will receive additional non-productive hours to bring the total hours in the pay period up to the Employee's full FTE status, and the Employee will receive full salary for the pay period and will not have to use PTO. For

[1] A non-exempt Employee will receive holiday pay for all hours worked on a holiday (including shift differential when applicable) in accordance with the Employee's Employer's normal pay policy or practice in addition to receiving a holiday benefit.

example, if a 0.8 FTE exempt Employee is regularly scheduled to work four (4) 12-hour shifts and two (2) eight-hour shifts per pay period (a total of 64 hours per pay period), and a recognized holiday falls on a day when the Employee is regularly scheduled to work a 12-hour shift, and if the Employee does not work on that day (but does work the rest of the regularly scheduled shifts), then the Employee will receive 64 total hours (0.8 FTE) in the pay period, consisting of: (i) 6.4 hours of holiday pay (8 hours x 0.8 = 6.4 hours); (ii) 52 hours of regular pay; and (iii) 5.6 non-productive hours.

If a less than 1.0 FTE exempt Employee is not regularly scheduled to work on a recognized holiday, the Employee will still receive holiday benefit pay based on the Employee's FTE status, and the Employee is expected to work with the Employee's manager or supervisor to adjust the Employee's schedule for the rest of the pay period to remain within the Employee's FTE status. For example, if a recognized holiday falls on a Tuesday, and a 0.5 FTE exempt Employee does not work on Tuesdays, but normally works five (5) eight-hour shifts on other days in each two-week period, the Employee will be paid a holiday benefit of four (4) hours (8 hours x 0.5 FTE) for that Tuesday. If the Employee worked the remaining regularly scheduled shifts, the total regular hours plus holiday benefit hours would equal forty-four (44) hours, exceeding a 0.5 FTE. As a result, the Employee's remaining schedule during the pay period should be reduced by four (4) hours to remain within the Employee's FTE hours for that pay period.

If an exempt Employee works on a recognized holiday, the Employee will be expected to work with the Employee's manager or supervisor to adjust the Employee's schedule for the rest of the same pay period to account for the holiday benefit and remain within the Employee's FTE hours for that pay period. For example, if a recognized holiday falls on a Tuesday and an exempt Employee works on the holiday, the Employee should work with the Employee's manager or supervisor to take another day off during the pay period in which the holiday occurred.

Holiday Benefit While on a Leave of Absence

In general, if a recognized holiday under this Policy occurs while an Employee is using PTO, the Employee will receive a holiday benefit under this Policy instead of using PTO hours for that day. However, if the Employee is less than a 1.0 FTE non-exempt Employee, the Employee may elect to supplement the holiday benefit received with PTO, and, if the Employee is less than a 1.0 FTE exempt Employee, the Employee may receive additional non-productive hours as necessary to bring the Employee to the Employee's FTE status for the pay period in which the holiday falls, in the manner described above.

If a recognized holiday under this Policy occurs while an Employee is both on a leave of absence due to his or her own health condition and is receiving short-term disability benefits (even if the Employee is supplementing short-term disability benefits with PTO), salary continuation benefits, long-term disability benefits, state paid disability benefits, state paid family leave benefits, or workers' compensation, the Employee will not receive a holiday benefit under this Policy. In addition, no holiday benefit is paid to an Employee during any unpaid leave of absence.

SCOPE/APPLICABILITY

This Policy is intended to be a system-wide policy that applies to all Employees of Trinity Health and the Ministries and the Subsidiaries that have adopted this Policy as set forth in Appendix A.

It replaces and supersedes any existing Policies or Procedures of the Employers regarding any holiday benefit. The Policy is subject to any modifications necessary to comply with applicable state and local law (as set forth in Appendix B hereto), collective bargaining agreements, written employment agreements, accreditation requirements, or otherwise and that are approved by the Trinity Health EVP, Chief Human Resources Officer or an appropriate designee, in consultation with the Trinity Health Legal Department as necessary. For purposes of this Policy, the Trinity Health Vice President, Total Rewards Benefits & Well-Being is an authorized designee to approve such modifications.

PROCEDURES

The Trinity Health Human Resources Department is responsible for establishing, implementing, and enforcing Procedures, Standards, or Guidelines to be followed by Trinity Health and its Ministries in the implementation and application of this Policy.

DEFINITIONS

Calendar Year means January 1st through December 31st.

Employee means an employee of an Employer, whether that individual's status is permanent or temporary, contingent, part-time, or full-time. Trinity Health often uses the term "colleague" to refer to its Employees. The Policy does not change an Employee's Primary Employer, defined as the payroll company of record, and does not create a joint employment relationship with any entity.

Employer means Trinity Health and each of its Ministries and Subsidiaries that have adopted this Policy as set forth in Appendix A. If the effective date of this Policy for an Employer is different than the effective date of this Policy, the effective date for the Employer will be listed in Appendix A.

Executive Leadership Team ("ELT") means the group that is composed of the highest level of management at Trinity Health.

Ministry means a first tier (direct) subsidiary, affiliate, or operating division of Trinity Health that maintains a governing body that has day-to-day management oversight of a designated portion of Trinity Health System operations. A Ministry may be based on a geographic market or dedication to a service line or business. Ministries include Mission Health Ministries, National Health Ministries, and Regional Health Ministries.

Policy means a statement of high-level direction on matters of importance to Trinity Health, its Ministries, and its Subsidiaries, or a statement that further interprets Trinity Health's, its Ministries', and its Subsidiaries' governing documents. Policies may be either stand alone, Systemwide, or Mirror Policies designated by the approving body.

Primary Employer means the entity for which the Employee provides more than 50% of services and is the payroll company of record.

Procedure means a document designed to implement a Policy or a description of specific required actions or processes.

Standards or Guidelines mean additional guidance which assists an Employee in understanding the Employer's rule, policies, and/or procedures, including those developed by accreditation or professional organizations.

Subsidiary means a legal entity in which a Ministry is the sole corporate member or sole shareholder.

RESPONSIBLE DEPARTMENT

Further guidance concerning this Policy may be obtained from the Trinity Health Human Resources Department.

RELATED POLICIES, PROCEDURES, AND OTHER MATERIALS

List and hyperlink:

- Trinity Health Human Resources Ministry-Wide Policy No. 1019 (Paid Time Off (PTO) – Program A)
- Trinity Health Human Resources Ministry-Wide Procedure No. 1019 (Paid Time Off (PTO) – Program A)
- Trinity Health Human Resources Ministry-Wide Policy No. 1020 (Paid Time Off (PTO) – Programs B and C, System Office Directors, and System Office Vice Presidents
- Trinity Health Human Resources Ministry-Wide Procedure No. 1020 (Paid Time Off (PTO) – Programs B and C, System Office Directors, and System Office Vice Presidents)
- Trinity Health Human Resources Ministry-Wide Policy No. 1034 (Definitions of Employment Classifications)

APPROVALS

Initial Approval: August 18, 2022
Subsequent Review/Revision(s): July 1, 2025
Initial Approval as Mirror Policy No. 1: January 9, 2019, effective for first payroll containing January 1, 2019
Subsequent Review/Revision(s) of Mirror Policy No. 1: August 13, 2019

APPENDIX A
List of Employers

Click the link Participating Employer Appendix and follow the instructions in red on the Policy Lookup Instructions tab to see what policies and procedures apply to each Health Ministry.

APPENDIX B
Holiday Benefit
State/Local Law Requirements

State	State/Local Law Requirement(s)	Links
Alabama		
Alaska	Alaska law does not allow forfeiture of accrued unused PTO, drop-in PTO, and floating holiday hours. Termination: Accrued PTO, drop-in PTO, and floating holiday hours will be paid out at termination. Carryover: For drop-in plans, 40 hours will be carried over into the next calendar year and the balance paid out. For accrual plans, PTO hours will roll over and continue to accrue per Trinity Health policy. Change from PTO eligible to non-PTO eligible status: Accrued PTO, drop-in PTO, and floating holiday hours will be paid out upon status change. Change in PTO plan: Upon change from drop-in plan to accrual plan, up to 40 drop-in hours will be rolled over into the new accrual bank and the balance will be paid out. Upon change from an accrual plan to a drop-in plan, all accrued PTO will be paid out.	
Arizona	Not Applicable	
Arkansas	Not Applicable	
California	California law does not allow forfeiture of accrued unused PTO, drop-in PTO, and floating holiday hours. Termination: Accrued PTO, drop-in PTO, and floating holiday hours will be paid out at termination. Carryover: For drop-in plans, 40 hours will be carried over into the next calendar year and the balance paid out. For accrual plans, PTO hours will roll over and continue to accrue per Trinity Health policy. Change from PTO eligible to non-PTO eligible status: Accrued PTO, drop-in PTO, and floating holiday hours will be paid out upon status change. Change in PTO plan: Upon change from drop-in plan to accrual plan, up to 40 drop-in hours will be rolled over into the new accrual bank and the balance will be paid out. Upon change from an accrual plan to a drop-in plan, all accrued PTO will be paid out.	
Colorado	Colorado law does not allow forfeiture of accrued unused PTO, drop-in PTO, and floating holiday hours. Termination: Accrued PTO, drop-in PTO, and floating holiday hours will be paid out at termination. Carryover: For drop-in plans, 40 hours will be carried over into the next calendar year and the balance paid out. For accrual plans, PTO hours will roll over and continue to accrue per Trinity Health policy. Change from PTO eligible to non-PTO eligible status: Accrued PTO, drop-in PTO, and floating holiday hours will be paid out upon status change. Change in PTO plan: Upon change from drop-in plan to accrual plan, up to 40 drop-in hours will be rolled over into the new accrual bank and the balance will be paid out. Upon change from an accrual plan to a drop-in plan, all accrued PTO will be paid out.	
Connecticut	Not Applicable	

Delaware	Not Applicable	
Florida	Not Applicable	
Georgia	Not Applicable	
Hawaii	Not Applicable	
Idaho	Not Applicable	
Illinois	Illinois law allows limited forfeiture of accrued PTO, drop-in PTO, and floating holiday hours. Termination: Accrued PTO, drop-in PTO, and floating holiday hours will be paid out at termination. Carryover: For drop-in plans, a maximum of 40 hours will be carried over into the next calendar year per Trinity Health policy. For accrual plans, PTO hours will roll over and continue to accrue per Trinity Health policy. Change from PTO eligible to non-PTO eligible status: Drop-in PTO, accrued PTO, and floating holiday hours will be paid out upon status change. Change in PTO plan: Upon change from drop-in plan to accrual plan, all available PTO hours will be rolled over into the new accrual bank up to the accrual bank maximum, and the balance will be paid out. Upon change from an accrual plan to a drop-in plan, all accrued PTO will be paid out.	
Indiana	Not Applicable	
Iowa	Not Applicable	
Kansas	Not Applicable	
Kentucky	Not Applicable	
Louisiana	Louisiana law allows limited forfeiture of accrued PTO, drop-in PTO, and floating holiday hours. Termination: Accrued PTO, drop-in PTO, and floating holiday hours will be paid out at termination. Carryover: For drop-in plans, a maximum of 40 hours will be carried over into the next calendar year per Trinity Health policy. For accrual plans, PTO hours will roll over and continue to accrue per Trinity Health policy. Change from PTO eligible to non-PTO eligible status: Drop-in PTO, accrued PTO, and floating holiday hours will be paid out upon status change. Change in PTO plan: Upon change from drop-in plan to accrual plan, up to 40 available PTO hours will be rolled over into the new accrual bank and the balance paid out. Upon change from an accrual plan to a drop-in plan, all accrued PTO will be paid out.	
Maine	Maine law allows limited forfeiture of accrued PTO, drop-in PTO, and floating holiday hours. Termination: Accrued PTO, drop-in PTO, and floating holiday hours will be paid out at termination. Carryover: For drop-in plans, a maximum of 40 hours will be carried over into the next calendar year per Trinity Health policy. For accrual plans, PTO hours will roll over and continue to accrue per Trinity Health policy. Change from PTO eligible to non-PTO eligible status: Drop-in PTO, accrued PTO, and floating holiday hours will be paid out upon status change. Change in PTO plan: Upon change from drop-in plan to accrual plan, up to 40 available PTO hours will be rolled over into the new accrual bank and the balance paid out. Upon change from an accrual plan to a drop-in plan, all accrued PTO will be paid out. Floating holidays are not impacted by this change.	
Maryland	Not Applicable	

Massachusetts	Massachusetts law allows limited forfeiture of accrued PTO, drop-in PTO, and floating holiday hours. Termination: Accrued PTO, drop-in PTO, and floating holiday hours will be paid out at termination. Carryover: For drop-in plans, a maximum of 40 hours will be carried over into the next calendar year per Trinity Health policy. For accrual plans, PTO hours will roll over and continue to accrue per Trinity Health policy. Change from PTO eligible to non-PTO eligible status: Drop-in PTO, accrued PTO, and floating holiday hours will be paid out upon status change. Change in PTO plan: Upon change from drop-in plan to accrual plan, up to 40 available PTO hours will be rolled over into the new accrual bank and the balance paid out. Upon change from an accrual plan to a drop-in plan, all accrued PTO will be paid out. Floating holidays are not impacted by this change.	
Michigan	Not Applicable	
Minnesota	Not Applicable	
Mississippi	Not Applicable	
Missouri	Not Applicable	
Montana	Montana law does not allow forfeiture of accrued unused PTO, drop-in PTO, and floating holiday hours. Termination: Accrued PTO, drop-in PTO, and floating holiday hours will be paid out at termination. Carryover: For drop-in plans, 40 hours will be carried over into the next calendar year and the balance paid out. For accrual plans, PTO hours will roll over and continue to accrue per Trinity Health policy. Change from PTO eligible to non-PTO eligible status: Accrued PTO, drop-in PTO, and floating holiday hours will be paid out upon status change. Change in PTO plan: Upon change from drop-in plan to accrual plan, up to 40 drop-in hours will be rolled over into the new accrual bank and the balance will be paid out. Upon change from an accrual plan to a drop-in plan, all accrued PTO will be paid out.	
Nebraska	Nebraska law does not allow forfeiture of accrued unused PTO, drop-in PTO, and floating holiday hours. Termination: Accrued PTO, drop-in PTO, and floating holiday hours will be paid out at termination. Carryover: For drop-in plans, 40 hours will be carried over into the next calendar year and the balance paid out. For accrual plans, PTO hours will roll over and continue to accrue per Trinity Health policy. Change from PTO eligible to non-PTO eligible status: Accrued PTO, drop-in PTO, and floating holiday hours will be paid out upon status change. Change in PTO plan: Upon change from drop-in plan to accrual plan, up to 40 drop-in hours will be rolled over into the new accrual bank and the balance will be paid out. Upon change from an accrual plan to a drop-in plan, all accrued PTO will be paid out.	
Nevada	Not Applicable	
New Hampshire	Not Applicable	
New Jersey	Not Applicable	
New Mexico	Not Applicable	
New York	Not Applicable	
North Carolina	Not Applicable	

North Dakota	North Dakota law allows limited forfeiture of accrued PTO, drop-in PTO, and floating holiday hours. Termination: Accrued PTO, drop-in PTO, and floating holiday hours will be paid out at termination. Carryover: For drop-in plans, a maximum of 40 hours will be carried over into the next calendar year per Trinity Health policy. For accrual plans, PTO hours will roll over and continue to accrue per Trinity Health policy. Change from PTO eligible to non-PTO eligible status: Drop-in PTO, accrued PTO, and floating holiday hours will be paid out upon status change. Change in PTO plan: Upon change from drop-in plan to accrual plan, up to 40 available PTO hours will be rolled over into the new accrual bank and the balance will be paid out. Upon change from an accrual plan to a drop-in plan, all accrued PTO will be paid out.	
Ohio	Not Applicable	
Oklahoma	Not Applicable	
Oregon	Not Applicable	
Pennsylvania	Not Applicable	
Rhode Island	Rhode Island law allows limited forfeiture of accrued PTO, drop-in PTO, and floating holiday hours. Termination: Accrued PTO, drop-in PTO, and floating holiday hours will be paid out at termination. Carryover: For drop-in plans, a maximum of 40 hours will be carried over into the next calendar year per Trinity Health policy. For accrual plans, PTO hours will roll over and continue to accrue per Trinity Health policy. Change from PTO eligible to non-PTO eligible status: Drop-in PTO, accrued PTO, and floating holiday hours will be paid out upon status change. Change in PTO plan: Upon change from drop-in plan to accrual plan, up to 40 available PTO hours will be rolled over into the new accrual bank and the balance will be paid out. Upon change from an accrual plan to a drop-in plan, all accrued PTO will be paid out.	
South Carolina	Not Applicable	
South Dakota	Not Applicable	
Tennessee	Not Applicable	
Texas	Not Applicable	
Utah	Not Applicable	
Vermont	Not Applicable	
Virginia	Not Applicable	
Washington	Not Applicable	
West Virginia	Not Applicable	
Wisconsin	Not Applicable	
Wyoming	Not Applicable	