



Employment Policies and Procedures Manual

Prepared By: CARIE's Human Resources Committee

Approved by the Board at its regular meeting on ~~March 19, 2015~~.

Note The content of a manual does not constitute nor should it be construed as a promise of employment or as a contract between Center for Advocacy for the Rights and Interests of the Elderly and any of its employees.

Center for Advocacy for the Rights and Interests of the Elderly at its option, may change, delete, suspend, or discontinue parts or the policy in its entirety, at any time without prior notice.

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1. INTRODUCTION

This document has been developed by Human Resources Committee of the Board of Directors in consultation with staff in order to familiarize employees with the Center for Advocacy for the Rights and Interests of the Elderly (CARIE) and provide information about working conditions, key policies, procedures, and benefits affecting employment at CARIE.

1.1 Welcome

Welcome to CARIE! We are pleased to have you as part of our organization.

The mission of CARIE is to improve the wellbeing, rights and autonomy of older persons through advocacy, education and action.

1.2 History

CARIE was organized in 1977 by a coalition of consumers and professionals concerned about the availability and quality of long-term care services for the elderly. CARIE operates on two levels, providing *individual advocacy* through direct contact with consumers and caregivers and *systemic advocacy* through education and public-policy initiatives. Through its unique 'circle of advocacy', CARIE's daily contact with older adults and those who care for and about them shapes CARIE's advocacy efforts directed toward systemic change which in turn improves the lives of older persons.

1.3 Responsibility for Policies

The Board of Directors of CARIE has the ultimate responsibility for the establishment and approval of any amendment to the personnel policies. The policies shall be reviewed annually by the Board of Directors.

The Executive Director is responsible for administering the personnel policies approved by the Board of Directors. On a periodic basis, the Executive Director and the staff shall review these policies and the Executive Director shall recommend modifications, if any, to be presented to the Board of Directors for consideration and approval.

1.4 Changes in Policy/Effect of Manual

This manual supersedes and replaces all previous employee manuals and memos.

While every effort is made to keep the contents of this document current, CARIE reserves the right to unilaterally modify, suspend, or terminate any of the policies, procedures, and/or benefits described in the manual with or without prior notice to employees.

1.5 Effect of Manual

If any discrepancy between this manual and current company policy arises, conform to current company policy. Every effort will be made to keep employees informed of CARIE's policies, however we cannot guarantee that notice of revisions will be provided. Feel free to ask questions about any of the information within this manual.

This manual is not a contract, expressed or implied, guarantying employment for any length of time and is not intended to induce an employee to accept employment with CARIE.

2. WORKPLACE COMMITMENTS

An "employee" of CARIE is a person who regularly works for CARIE on a wage or salary basis.

2.1 At-Will Employment

Employment at CARIE is at-will. An at-will employment relationship can be terminated at any time, with or without reason or notice by either the employer or the employee. This at-will employment relationship exists regardless of any statements by office personnel to the contrary. Nothing in this manual is to be construed to alter the at-will status of any employee. Only the Executive Director is authorized to modify the at-will nature of the employment relationship, and the modification must be by written agreement signed by the Executive Director or other individual authorized by resolution of the Board of Directors.

2.2 Equal Employment Opportunity

CARIE is an equal opportunity employer and does not engage in unlawful discrimination with respect to hiring and promotion of individuals, conditions of employment, disciplinary or discharge practices, or any other aspect of employment on the basis of sex, race color, age, national origin, religion, disability, marital status, sexual orientation, gender identity, pregnancy, veteran status or any other status protected by applicable law.

CARIE's objective is to assure that individuals are treated in a fair and non-discriminatory manner throughout the employment process. CARIE selects, develops and promotes employees based on the individual's ability, qualifications, experience and job performance. CARIE aims to maintain a working environment free of all forms of unlawful discrimination, harassment, intimidation, and/or retaliation against anyone who makes an equal employment opportunity complaint. CARIE strives to comply with the letter and spirit of relevant local, state and federal laws concerning equal employment opportunity. These laws are complex and this policy cannot address every situation that might arise. Therefore all directors and employees must exercise good judgment in dealings with employees of CARIE. Employees should speak to their supervisor, the Executive Director of CARIE, or the Chair of the CARIE Board if there are questions regarding the policies.

Reporting Discrimination: CARIE strongly encourages the prompt reporting of all incidents of discrimination. If you believe that you have been subjected to discrimination in violation of this policy, or if you have observed such discrimination, CARIE requires you to notify promptly your supervisor,

manager or the Executive Director. If you are uncomfortable for any reason in bringing such a matter to the attention of your supervisor, or are not satisfied after bringing the matter to the supervisor's attention, you should report the matter to the Executive Director. Any manager who receives a report of harassment must immediately notify the Executive Director who will notify the Board Chair. If you are uncomfortable for any reason in bringing such a matter to the attention of the Executive Director, or are not satisfied after bringing the matter to the Executive Director's attention, you should report the matter to the Compliance Officer, who may report the matter directly to the Board Chair. Any question about this policy or whether or not a behavior constitutes discrimination should also be brought to the attention of the Executive Director or the Compliance Officer. The name of the Compliance Officer is posted with other employee notices in a place accessible to all employees.

Non-Retaliation: An individual who reports an incident which he or she believes to be in violation of this policy, or who is involved in the investigation of discrimination, will not be subject to reprisal or retaliation. Retaliation is a serious violation of this policy and should be reported immediately to the Executive Director and Board Chair. The report and investigation of allegations of retaliation will follow the procedures set forth in this policy. Any person found to have retaliated against an individual for reporting discriminatory harassment or for participating in an investigation of allegations of such conduct will be subject to appropriate disciplinary action including termination.

1.3 Americans with Disabilities Act

It is the policy of CARIE to comply with all of the relevant and applicable provisions of the Americans with Disabilities Act (ADA). Notwithstanding CARIE's commitment to nondiscrimination, CARIE reserves the right to decline to hire someone on the basis that they cannot meet a Bonafide Occupation Qualification, as that is defined by the Americans with Disabilities Act. CARIE will not discriminate against any qualified employee or job applicant with respect to any terms, privileges, or conditions of employment because of a person's physical or mental disability.

Additionally, whenever possible, the CARIE makes reasonable accommodations for qualified individuals with disabilities to the extent required by law. Employees or applicants who would like to request a reasonable accommodation should contact their immediate supervisor or the executive director.

2.4 Immigration Law Compliance

All offers of employment are contingent on verification of the candidate's right to work in the United States. On the first day of work, every new employee will be asked to provide original documents verifying the right to work and, as required by federal law, to sign Federal Form I-9, Employment Eligibility Verification Form.

2.5 Selection of Personnel

The Executive Director shall be hired by the Board of Directors.

The Executive Director shall be responsible for the hiring of all other employees.

2.6 Screening of Personnel

All new hires are subject to a criminal record check in Pennsylvania and by the FBI to the extent required by law and CARIE policy and practice.

An employee is required to self-report any arrest for criminal activity to the Executive Director.

Requirements of those who drive on CARIE Business: Employees who drive in the line of work for CARIE may be subject to a driving record check prior to assignment. Employees will submit a copy of proof of their current insurance coverage (valid insurance card) upon renewal.

Employees will self-report any driving violation or accident that occurs while they are employed by CARIE.

CARIE prohibits the use of any device including cell phones when driving a vehicle while on authorized CARIE business.

2.7 Staff Evaluation

The Executive Director and/or an employee's immediate supervisor will provide a written evaluation of each employee at the end of six-months of employment. All employees will be reviewed annually.

2.8 Political Activity

No staff member shall, on behalf of CARIE, participate or intervene in any political campaign, on behalf of any candidate for public office, including publishing or distributing statements. Staff members may engage in political activity as private citizens, and shall not represent themselves as spokespersons for CARIE.

2.9 Substance Abuse Policy

Consistent with the United States Drug-Free Workplace Act of 1988, CARIE prohibits the unlawful possession, use, manufacture, consumption, selling or distribution of controlled substances in the workplace. Any employee who uses, possesses, manufactures, sells or distributes illegal drugs while on CARIE property, or otherwise in the course of employment, will be subject to disciplinary action, up to and including termination.

In addition, employees may not be under the influence of any controlled substance, such as drugs or alcohol, while at work, on CARIE premises or engaged in CARIE business. Appropriate use of prescription or over-the-counter medications are an exception to this policy.

2.10 Smoking Policy

CARIE's offices shall be entirely smoke-free.

2.11 Emergency Preparedness

CARIE is concerned with workplace safety and has instituted evacuation procedures in the event of an emergency. The Executive Director appoints a Safety Officer. Emergency drills are conducted to ensure that all employees are aware of CARIE's evacuation procedures.

3. EMPLOYMENT CLASSIFICATION AND WAGES

CARIE assigns positions, determines wages and compensates employees in accordance with federal, state and local laws.

3.1 Categories of Employees for Benefits Eligibility

Full-time employees: Employees who are regularly scheduled to work 32 hours or more per week are considered full-time.

Part-time employees: Employees who are regularly scheduled to work at least 20 and fewer than 32 hours per week are considered part-time.

Seasonal, temporary or occasional: This is a catch-all category for employees who fit neither the definition of full-time or part-time employee. Occasional employees are those who regularly work 19 or fewer hours per week. Seasonal and temporary workers are those hired for a short period of time (e.g. summer). Temporary and seasonal employees may work either part-time or full-time, but generally are scheduled to separate from employment by a certain date. Temporary or seasonal employees who remain on duty past the scheduled separation date remain classified as temporary or seasonal. Only the Executive Director may change an employee's status which change must be made in writing.

3.2 Hours of Work and Attendance

Normal office hours are Monday through Friday from 9:00 AM to 5:00 PM. Daily work hours may vary according to assignment and job demands. Full time employees are paid for their lunch hour and may be asked to work during or in lieu of lunch hour. Non-full-time employees are not paid for lunch hour. Hours may vary depending on work location and job responsibilities. Where appropriate, supervisors will provide employees with a work schedule.

At the discretion of the Executive Director, the office may be closed on certain days. All employees will be paid for those days based upon the hours they were scheduled to work, all employees may be asked to perform work on those days that the office is closed and are to remain in contact and available to work.

3.3 General Attendance

CARIE does not tolerate absenteeism without excuse. Employees who will be late to or absent from work should notify a supervisor in advance, or as soon as practicable in the event of an emergency.

Chronic or unexcused absenteeism may result in disciplinary action.

Employees who need to leave early, for illness or otherwise, should inform a supervisor before departure. Unauthorized departures may result in disciplinary action.

3.4 Tardiness

Employees are expected to arrive on time and ready for work. An employee who arrives after their scheduled arrival time is considered tardy. CARIE recognizes that situations arise which hinder punctuality. Nevertheless, excessive tardiness is prohibited, and may be subject to disciplinary action.

4. PAID LEAVE

Employees shall not be entitled to paid time off except as expressly provided by this manual or, under unusual circumstances, as set forth in writing by the Executive Director. Only those employees who are designated full-time or part-time employees by the Executive Director, as defined in Section 3.1 above are entitled to vacation and holiday leave as set forth in Sections 4.1 and 4.2 below.

4.1 Holidays and Personal Days

Holidays: CARIE observes the following ten (10) paid holidays: New Year's Day, Martin Luther King Day, Presidents' Day, Good Friday, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, the day immediately after Thanksgiving Day, and Christmas Day. Full time employees are eligible for paid holidays immediately upon hire. Part-time employees are eligible for paid holidays if they are normally scheduled to work that day. They are paid for the hours they normally would have worked. If not scheduled to work on a holiday, part-time employees are not compensated for the holiday. Seasonal, temporary and occasional employees are not paid for holidays.

Personal Leave: Each employee shall have three (3) personal days which must be used within the calendar year. Personal days are pro-rated for part-time employees based on the hours they work. There is no carryover of Personal Leave from one calendar year to the next. No employee is entitled to be paid for unused personal days upon separation of employment. Newly hired employees are entitled to personal days as follows:

Dates of Hire	Personal Days
January 1 – March 31	3
April 1 – June 30	2
July 1 – September 30	1
October 1 – December 31	0

4.2 **Vacation Leave:** Vacation Leave is granted as follows:

EMPLOYMENT YEAR(S)	VACATION ACCRUAL	40 hour/week ACCRUAL RATE	20-39 hour/week ACCRUAL RATE
1-2	2 WEEKS	.83 hours/month	% of F/T hours worked
3-5	3 WEEKS	1.25 hours/month	% of F/T hours worked
More than 5	4 WEEKS	1.66 hours/month	% of F/T hours worked

Full-time and part-time employees as defined in Section 3.1 will be granted vacation leave, as shown in the chart above, each July 1st. All vacation leave must be used by June 30 of the fiscal year in which it is earned, or it is forfeited. If an employee leaves employment with CARIE before June 30, he or she will be paid for any vacation leave accrued but not yet used. Vacation leave may be taken prior to accrual. As a condition of taking any vacation not yet accrued, the employee will be required to provide written consent to CARIE to deduct the corresponding pay from the employee's final paycheck.

Scheduling Vacation: All employees are responsible to ensure that vacations do not interfere with the smooth operations of CARIE. Vacation requests should be made as far in advance as possible to your supervisor. Priority for vacation leave shall be given on a first come, first serve basis whenever possible. When employees simultaneously request the same leave period, preference will be given to the employee with the longest period of continuous employment.

The Executive Director has the authority to determine what/whom the organization needs to function successfully, and can deny vacation requests at her discretion.

Holidays/Sick Leave During Vacation: Holidays occurring during a vacation period shall not be charged against vacation leave. Illness following a holiday or during a vacation may be charged to sick leave only after a doctor's note, satisfactory to the Executive Director, is presented.

NOTE: Employees on staff prior to March 20, 2014 will continue to accrue and receive vacation under the policy in effect at their date of hire.

4.3 **Medical Leave**

Accrual: Full-time employees shall accrue sick leave at the rate of 1.25 days per calendar month (15 days per calendar year). Part time employees shall accrue a pro-rata share of medical leave for each calendar month of service based upon the number of hours worked per month. Seasonal, temporary and occasional employees are not entitled to sick leave unless required by applicable law; if required by applicable law they shall accrue the minimum sick leave permitted under the law.

Employees may accrue medical leave from one calendar year to the next up to a maximum of 60 days. The maximum number of days of sick leave that other employees may accrue from one calendar year to

the next shall be prorated based upon the number of hours worked. Employees should consider this accrual of medical leave as an accumulation of a sick time savings account, which will provide salary replacement in the event of an illness.

Use: Medical leave shall be granted in units of not less than one (1) hour. The immediate supervisor must be notified of all requests for medical leave.

Medical leave is reserved for absences necessitated by mental or physical illness or injury, childbirth, exposure to contagious diseases which require quarantine or isolation, medical or dental examinations, illness or injury to a member of the employee's household or immediate family. Immediate family members include parents, parents-in-law, grandparents, children and grandchildren. Use of medical leave is also permissible to obtain medical attention, services from a victim services organization, psychological or other counseling, relocation and legal services as necessitated by domestic abuse, sexual assault or stalking, or for any other purpose required by applicable law.

Employees are expected to notify their immediate supervisor as soon as practicable and no later than 9:00 a.m. on the day they are absent due to illness to report the reason and expected length of the absence. When the need for medical leave is known to the employee in advance, such as for a scheduled appointment with a health care provider, the employee shall notify his or her supervisor of the need for such time as far in advance as possible and shall make a reasonable effort to schedule the use of the medical time in a manner that does not unduly disrupt the operations of the employer.

If an employee uses leave for three or more consecutive days, CARIE reserves the right to require the employee to provide a certificate of a health care professional prior to or upon return to work and/or other reasonable documentation.

No pay for accrued but unused medical leave will be made upon separation of employment for any employee.

CARIE does not engage in or tolerate retaliation or discrimination against employees for proper use of medical leave.

4.4 Bereavement Leave

Employees may be granted up to three (3) days bereavement leave with pay upon the death of a member of the employee's household or an immediate family member and other such circumstances as approved by the Executive Director. The granting and duration of such leave will be as determined at the discretion of the Executive Director.

4.5 Jury Duty

CARIE recognizes that, at times, employees may be asked to serve on jury duty or as a witness during business hours. If an employee is called to serve, the employee should show the official summons or jury duty notice to employee's supervisor immediately. Employees who are summoned to jury duty will continue to receive their wages while on active jury duty for a period of up to two (2) weeks. For jury

service beyond two (2) weeks employees will be required to use vacation or other accrued paid leave. Upon exhaustion of such paid leave, employees will be required to take an unpaid leave of absence.

Employees are expected to return to work during regularly scheduled business hours when not involved in active jury duty, or if the jury is released early in the day. Employees may be required to provide additional documentation evidencing the jury service.

CARIE does not engage in or tolerate retaliation or discrimination against employees for mandatory jury service.

5. UNPAID LEAVES OF ABSENCE

5.1 General Conditions

An employee, other than the Executive Director, may request an unpaid leave of absence with a minimum of 5 days' notice after one year of employment by submitting the request in writing to the Executive Director.

A request for an unpaid leave of absence will be granted or denied within the Executive Director's sole discretion based on the following factors, without limitation: the reason for the request, the staffing needs of CARIE, the economic situation of the organization.

While on unpaid leave of absence, an employee shall not be entitled to earn holiday pay, nor to accrue sick or vacation leave. Employees on a leave of absence shall not be permitted to accept other employment without the written permission of the Executive Director.

The leave shall not exceed one month, but can be extended at the discretion of the Executive Director. The employee may be required to exhaust other forms of available paid or unpaid leave prior to or in lieu of the granting of such leave.

Health benefits (medical insurance) will continue while the employee is on leave for up to one month. The employee will be expected to pay the employee share of health benefits as applicable. Employees shall be notified of their rights to continue insurance after this period through COBRA.

5.2 Family Leave

Employees shall be eligible to request leave without pay after one year of employment with the approval of the Executive Director in order to care for immediate family members, such as newborn or adopted babies or children, ill or injured spouse, child or parent.

Family leave without pay may be granted at the sole discretion of the Executive Director and is not to exceed three (3) months. The employee may be required to exhaust other forms of available paid or unpaid leave prior to or in lieu of the granting of family leave. An employee must state an intention to return to CARIE at the end of the period on the same basis as previously employed. Health benefits will

continue during the unpaid family leave up to three-months but all other benefits will be suspended. The employee will be expected to pay the employee share of health benefits as applicable.

No vacation or sick leave may be earned during an unpaid leave.

Upon the request of the employee and at the discretion of the Executive Director, family leave may be extended for an additional period of time, not to exceed two months, if the employee reiterates an intention to return to CARIE at the end of that period on the same basis as previously employed. During the extension, health benefits as well as all other benefits will be suspended. Employees shall be notified of their rights to continue insurance through COBRA.

5.3 Military Leave

An employee requesting a leave of absence to meet military obligations shall be granted such leave, without pay, together with any other rights and entitlements provided by law. A request for a military leave of absence should be submitted to your supervisor for approval with the maximum amount of notice possible, and shall be accompanied by a written request from your commanding officer or a copy of the official orders, if the leave is short-term. Employees leaving CARIE for full-time service in the military may be entitled to reinstatement in accordance with applicable laws and regulations. It is CARIE's policy to neither discriminate against employees based on their membership or service in the military nor retaliate against members of the military for requesting appropriate military leave.

6. WORKPLACE CONDUCT - PROHIBITION OF SEXUAL AND OTHER HARRASSMENT

6.1 Prohibition of Harassment

CARIE has a longstanding commitment to a work environment that respects the dignity and worth of each individual. The purpose of this policy is to promote a work environment free from all forms of harassment, whether that harassment is because of race, color, gender, sexual orientation, age, religion, national origin, disability, veteran status or any other characteristic or reason.

Any form of harassment, whether discriminatory, bullying, or sexual harassment is unacceptable, and will not be tolerated. All employees of CARIE are expected to avoid any behavior that could be interpreted or perceived as harassment. This policy applies to harassment occurring in the office, or in other work-related settings, and applies regardless of the gender of the individuals involved. This policy covers all employees of CARIE as well as applicants for employment. This policy also covers harassment by a non-employee (e.g., clients, family members, suppliers, volunteers, contract employees, etc.) to the extent that it affects the work environment or interferes with the performance of work. Anyone who believes that he or she has been subjected to harassment is encouraged to report the problem using the procedures set forth in this policy. CARIE will investigate a reported incident to the extent practicable and will take remedial action where appropriate.

6.2 Sexual Harassment Defined

For purposes of this policy, sexual harassment includes unwelcome sexual advances, requests for sexual favors, and other verbal references or physical conduct of a sexual or gender-based nature when:

- Submission to such conduct is either explicitly or implicitly made a term or condition of an individual's employment; or
- Submission to or rejection of such conduct is used as the basis for employment decisions affecting the individual; or
- Such conduct unreasonably interferes with an individual's work performance or creates an intimidating, hostile, or offensive working environment.

Some examples of what may constitute sexual harassment include: threatening or taking adverse employment action, such as discharge or demotion, if sexual favors are not granted; demands for sexual favors in exchange for favorable or preferential treatment; unwelcome and repeated flirtations, propositions or advances; unwelcome physical contact; whistling; leering; improper gestures; offensive, derogatory or degrading remarks; unwelcome comments about appearance; sexual jokes or use of sexually explicit or offensive language; gender or sex-based pranks; and the display of sexually suggestive objects or pictures in work areas. The above list of examples is not intended to be all-inclusive.

6.3 Discriminatory Harassment Defined

For purposes of this policy, discriminatory harassment is defined as verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of race, color, gender, age, religion, national origin, disability, veteran status or any other characteristic protected by law, and that:

- Creates an intimidating, hostile, or offensive work environment; or
- Unreasonably interferes with an individual's work performance

Some examples of such harassment are: using epithets or slurs; mocking, ridiculing or mimicking another's culture, accent, appearance or customs; threatening, intimidating or engaging in hostile or offensive acts based on an individual's race, color, gender, religion, national origin, disability, veteran status or any other characteristic protected by law; displaying on walls, bulletin boards, or elsewhere in the organization, or circulating in the workplace, written, electronic, or graphic material that denigrates or shows hostility toward a person or group because of an individual's race, color, gender, age, religion, national origin, disability, veteran status or any other characteristic protected by law. The above list of examples is not intended to be all-inclusive.

No harassment of any kind will be tolerated at CARIE.

6.4 Consensual Relations among Employees

Consensual romantic and/or sexual relationships between a manager or supervisor, and non-managers or supervisors, or between an employee with supervisory authority and a subordinate, will compromise CARIE's ability to enforce its policy against sexual harassment. In addition, relationships among employees may compromise CARIE's ability to maintain a productive and/or comfortable work

environment. Consequently, if such relationships arise, they will be considered carefully by CARIE, and appropriate action will be taken. Such action may include termination of one or more employees in the relationship, a change in the responsibilities of the individuals involved in such relationships or transfer of location within the office to diminish or eliminate the supervisory relationship and workplace contact that may exist. Full cooperation by the persons involved in the relationship in this process is expected. Any manager or supervisory employee involved in such a relationship is required to report the relationship to the Executive Director as soon as it arises.

6.5 Reporting Harassment

CARIE encourages strongly the prompt reporting of all incidents of harassment. If you believe that you have been subjected to sexual or other harassment, or if you have observed such harassment, CARIE requires you to notify promptly your supervisor, manager or the Executive Director. If you are uncomfortable for any reason in bringing such a matter to the attention of your supervisor, or are not satisfied after bringing the matter to the supervisor's attention, you should report the matter to the Executive Director. Any manager who receives a report of harassment must immediately notify the Executive Director who will notify the Board Chair. If you are uncomfortable for any reason in bringing such a matter to the attention of the Executive Director, or are not satisfied after bringing the matter to the Executive Director's attention, you should report the matter to the Compliance Officer, who may report the matter directly to the Board Chair. Any question about this policy or whether or not a behavior constitutes harassment should also be brought to the attention of the Executive Director or the Compliance Officer. The name of the Compliance Officer is posted with other employee notices in a place accessible to all employees.

6.6 Investigation of Reports

When a report of harassment is made as specified above, the Board Chair will be notified and CARIE will undertake a prompt investigation as may be appropriate under the circumstances. The steps to be taken during the investigation cannot be fixed in advance, but will vary depending upon the nature of the allegations. Confidentiality will be maintained throughout the investigative process to the extent practicable and consistent with the need to undertake a full investigation.

6.7 Resolving the Matter

Upon completion of the investigation, corrective action will be taken, if appropriate and supported by the facts. Corrective action may include, but is not limited to, oral or written reprimand, referral to formal counseling, disciplinary suspension or probation, or discharge from CARIE.

6.8 Non-Retaliation

An individual who reports an incident which he or she believes to be in violation of this policy, or who is involved in the investigation of harassment, will not be subject to reprisal or retaliation. Retaliation is a serious violation of this policy and should be reported immediately to the Executive Director and Board Chair. The report and investigation of allegations of retaliation will follow the procedures set forth in

this policy. Any person found to have retaliated against an individual for reporting discriminatory harassment or for participating in an investigation of allegations of such conduct will be subject to appropriate disciplinary action including termination.

6.9 Communication

This policy is part of CARIE's overall commitment to open communication. CARIE encourages any employee with workplace concerns of any nature to bring those concerns to the attention of the Executive Director or the Compliance Officer.

7. WORK-RELATED EXPENSES AND AUTOMOBILE USAGE

7.1 Reimbursement of Expenses

All reasonable expenses incurred in the course of the employee's job responsibilities for CARIE will be reimbursed by CARIE. All requests for expense reimbursement must be reported on a fully completed reimbursement form, as currently in use by CARIE, be properly approved, and be submitted in accordance with the current organization procedure within 30 days of the date the expense was incurred.

The cost of transportation for employees in public vehicles on authorized CARIE business (other than the cost of commuting to and from place of employment and home) shall be reimbursed by the organization.

Employees shall be reimbursed when using a private automobile on authorized CARIE business based on the mileage reimbursement rate established annually by the Executive Director. Parking charges will be reimbursed with a receipt if parking expense is necessary to carry out CARIE business.

Prior approval from the Executive Director is required for reimbursement for travel to meetings, conferences, seminars etc., including the cost of lodging, meals and registration fees.

7.2 Exclusions

Each employee who drives in the course of doing business for CARIE is responsible for maintaining adequate liability insurance for private automobiles and is required to furnish CARIE with proof of insurance and a current copy of the employee's valid driver's license. Failure to furnish this information will result in ineligibility for reimbursement. CARIE will not reimburse employees for any fines assessed for parking violations and/or driving violations incurred while driving on authorized CARIE business.

8. SEPARATION

8.1 Resignation

We expect any employee planning to resign to provide us as much advance notice as possible, with a minimum of two weeks' notice. Management staff is asked to provide three weeks' notice. Vacation accrual may not be used as part of the advance notice period. Any accrued unused vacation time will be paid consistent with Section above.

All CARIE property issued to an employee during the course of employment, including but not limited to computers, cell phone, credit cards, security keys, building access cards, tools, manuals, or other equipment or items, must be returned to the agency at the time employment terminates. Employees are responsible for the value of any items issued to them that are not returned by the last day of employment.

8.2 Dismissal

All employees are at-will employees and may be terminated by the Executive Director at the executive director's discretion for any lawful reason. Dismissal of senior-level employees will be brought to the attention of the Executive Committee by the Executive Director.

The decision of the Executive Director to dismiss an employee is final.

9. GRIEVANCES

9.1 Grievance Procedure

If an employee has a concern or complaint about the work environment or job, the employee shall first discuss the issue with the immediate supervisor. If, after such informal action, the problem is not resolved to the employee's satisfaction, and if he or she wishes to take formal action, the following steps shall be followed:

- The employee may request a meeting with the Executive Director to discuss the action. The Executive Director will notify the employee in writing within 5 working days of the decision regarding the grievance.
- The employee may request a meeting with the Board Chair to discuss the action recommended by the Executive Director if he or she is not satisfied with the decision of the Executive Director.

10. OFFICE ATTIRE

All employees are expected to dress professionally and appropriately for the work at hand ("business casual" or more formal business attire as required by the occasion). The following are examples of clothing not acceptable at CARIE: shorts, printed T-shirts, tank tops, midriff shirts (those exposing the

stomach), torn, patched or overly worn jeans and overalls. Supervisory staff will use their discretion in counseling employees about their attire.

11. WORK PERFORMANCE

1.1 Expectations

CARIE expects every employee to act in a professional manner. Satisfactory performance of job duties and responsibilities is key to this expectation. Employees should attempt to achieve their job objectives, and act with diligence and consideration at all times. Poor job performance can result in disciplinary action, up to and including termination.

11.2 Reviews

CARIE may periodically evaluate an employee's performance. The goal of a performance review is to identify areas where an employee excels and areas that need improvement. All performance reviews are based on merit, achievement and other factors that may include but are not limited to:

- Quality of work
- Attitude
- Knowledge of work
- Job skills
- Attendance and punctuality
- Teamwork and cooperation
- Compliance with company policy
- Past performance reviews
- Improvement
- Acceptance of responsibility and constructive feedback

Evaluations or any subsequent change in employment status, position or pay does not alter the employee's at will-relationship with CARIE.

Forward any questions about performance expectation or evaluation to the supervisor conducting the evaluation.

11.3 Insubordination

Supervisors and employees should interact with mutual respect and common courtesy. Employees are expected to take instruction from supervisors or other persons of authority. Failure to comply with instructions or unreasonably delaying compliance is considered insubordination. Acts of insubordination are subject to disciplinary action, up to and including termination.

If an employee disagrees with a supervisor, the employee should first try to mediate the situation by explaining their position. If possible, a compromise might be met and accusations of insubordination avoided.

12. EMAIL, INTERNET, SOCIAL NETWORKING, AND SOFTWARE POLICY

12.1 Email

The widespread use of technology to create, send, or receive messages via CARIE's e-mail system, via the Internet or other external systems requires that policies and guidelines be established and distributed to all CARIE personnel so that there is no misunderstanding about the ownership of messages created, sent, or received over CARIE's systems or stored on CARIE's systems. In addition, all users should be familiar with and follow CARIE's policies applicable to these systems. In this regard, the following policies and procedures govern the use of the electronic mail system and access to and disclosure of electronic mail messages:

- The electronic mail system is provided by CARIE to assist in the conduct of CARIE's business.
- The electronic mail system is CARIE property, and all messages created, sent, or received on the system or stored on CARIE's system are and remain the property of CARIE. They are not the private property of any employee irrespective of any such designation either by the sender or the recipient (including designation as "private").
- The electronic mail system is reserved for the conduct of the business of CARIE.
- The electronic mail system is not to be used to create, send, receive, or store any offensive or disruptive messages.
- CARIE maintains the right to review, audit, intercept, access and disclose all messages created, received, sent, or stored over the electronic mail system for any purpose. By using electronic mail systems an employee recognizes CARIE's rights and consents to it. The contents of electronic mail so obtained may be disclosed within CARIE and to third parties without further permission of the employee and at CARIE's discretion. In certain situations, CARIE may be compelled to access and disclose messages to third parties sent over its electronic mail system.
- The confidentiality of any message should not be assumed. Even when a message is deleted, it may still be possible to retrieve and read that message. Further, the use of passwords for security does not guarantee confidentiality. The existence of passwords and "message delete" functions do not restrict or eliminate CARIE's ability or right to access electronic communications.
- Notwithstanding CARIE's right to retrieve and read any electronic mail messages, such messages should be treated as confidential by individual employees and accessed only by the intended recipient. Employees should not attempt to gain access to messages of another without the latter's permission. All computer passwords and codes must be disclosed to CARIE, and no such password or code may be used that is unknown to CARIE. Any exception to this policy must receive prior written approval from CARIE.
- The electronic mail system must not be used to send (upload) or receive (download) copyrighted materials, trade secrets, proprietary financial information, or similar materials without proper authorization.

12.2 Internet

The following policies and procedures govern use of CARIE's computer network and its connection to the Internet. To the extent electronic messages are sent by the Internet, the policies and procedures set forth with respect to E-mail are also applicable.

- CARIE's computer network, including its connection to the Internet, is for the conduct of the business of CARIE and not for personal use. Any unauthorized use of the Internet is a violation of CARIE policy. Unauthorized use includes, but is not limited to, personal shopping, playing games, engaging in computer "hacking" and other related activities; connecting, posting or downloading offensive material; and disabling or compromising the security of information contained on CARIE's computers. CARIE reserves the right to monitor Internet use by CARIE employees, in terms of both frequency of usage and specific Internet sites visited.
- There should be no assumption that messages sent via the Internet are confidential. Anything sent through the Internet passes through a number of different computer systems, all with different levels of security. The confidentiality of messages may be compromised at any point along the way, unless the messages are encrypted. CARIE has encryption programs available.
- Because postings and participation in electronic discussion forums or discussion groups may display CARIE's name or address, every employee must ensure that any such postings or discussions comply with CARIE's standards and policies (including conflict of interest policies) and reflect appropriately upon CARIE and its reputation. We cannot compromise our client responsibilities to maintain confidences. Under no circumstances should information of a confidential, sensitive, or otherwise proprietary nature be put on the Internet. Offensive, demeaning, or disruptive messages are inappropriate under all circumstances.
- CARIE has an individual designated to manage CARIE's social network postings. No postings should be made by anyone else. Furthermore, CARIE employees should not make statements representing as CARIE on their personal social network pages.
- Subscriptions to news groups must be approved by CARIE. While list services can be valuable business tools, it is also possible for CARIE to receive literally thousands of messages a day generated by list services. Therefore, individual users may not subscribe to list services without prior approval.
- Unless prior approval of CARIE has been obtained, users may not establish Internet or other external network connections that could allow unauthorized persons to gain access to CARIE's systems and information. These connections include the establishment of hosts with public modem dial-ins, World Wide Web home pages and File Transfer Protocol (FTP).
- CARIE and its users must avoid reproduction of copyrighted or other protected material. We must minimize opportunities of CARIE's systems being infected by a virus attached to files on the Internet. All files downloaded from the Internet must be scanned for viruses.
- Nothing in this policy should be construed to prohibit employees from using CARIE's e-mail system during non-working time when they have access to the system to communicate with other employees regarding the terms and conditions of their employment in a manner

otherwise consistent with this manual. Employees should refrain from activity that will compromise the security or other proper functioning of the system, including the use of large audio or video attachments.

12.3 Social Networking

Social media encompasses a broad array of online activity. These activities include, but are not limited to, using or participating in social or professional networking sites, such as Facebook, and LinkedIn, posting or reviewing content on video-sharing sites, such as You Tube, creating “wikis”, and authoring or commenting on blogs and microblogs, such as Twitter.

CARIE recognizes and respects that it is your individual decision to engage in personal social media activities outside of organization time on your own personal equipment. If you do engage in such social media activities, it is important for you to be careful with communications that may impact the organization or its employees, even if you make the communications in your personal capacity. It is the right and duty of the organization to protect its employees and itself from, among other things, unauthorized disclosures of confidential information or matters that could affect the organization’s business and reputation. To ensure that CARIE and its employees adhere to their ethical and legal obligations, employees are required to comply with the organization’s Social and Professional Networking Guidelines. The intent of these Guidelines is not to restrict the flow of useful and appropriate information, but to minimize the risk to the organization and its employees.

In order to maintain CARIE’s reputation and legal standing and to protect its employees, the organization has put together the following list of Do’s and Don’ts as guidelines for issues that may be raised by social networking and other aspects of life online. Although the guidelines set forth below may not cover every situation, they provide guidance that will generally apply. At all times, employees are expected to use their best judgment while engaging in social and professional networking activities. Furthermore, the organization’s policies, including the principles set forth in this Policies and Procedures Manual in the Information Systems and Technology Policy, apply to your online presence and communications if they relate to the reputation and legal standing of CARIE, its employees, its properties, its vendors, its clients, or its related affiliates – even if you are engaging in these activities outside of the office or on a personal phone or computer:

DO:

- Think before you act or post and use common sense. You are personally responsible for the content you publish on blogs, wikis or any other form of user-generated media internally and externally, including, but not limited to, Facebook, LinkedIn, You Tube, and Twitter. Be mindful: what you publish will be public for a long time, and what you do and say may be viewed by your co-workers. This includes all postings that you may participate in, whether you originate, support, “like” and/or add comments.
- Refrain from using offensive language, posting references to illegal drugs, posting explicit sexual references, or posting obscene, embarrassing, derogatory or otherwise inappropriate material (such as disparaging comments about CARIE’s employees, products, services, distributors, and business prospects) that could injure CARIE’s reputation or legal standing.
- Refrain from posting or repeating false and disparaging information about a living person or a real product, strategy, or organization.
- Obey the law. Respect privacy, copyright, trademark, libel, defamation and other laws.

- Exercise discretion when adding “friends.” The process of connecting by inviting or responding to a co-worker or business associate’s “friend” request can often be awkward or create feelings of exclusion and coercion. Before inviting a co-worker or business associate to connect with you online ask: Is this connection appropriate?
- Exercise good judgment. Ensure that your profiles and postings are consistent with how you would present yourself to co-workers, vendors, or clients.
- Keep good taste in mind at all times.

DON’T:

- Engage in social media activities for business purposes on behalf of CARIE without the express permission of the Executive Director.
- Engage in personal social media activities while on organization time or using CARIE equipment.
- Post photos taken in the organization’s workplace without the express permission of the Executive Director.
- Use social media to harass, threaten, defame or libel, co-workers, vendors, clients, and the like.
- Use ethnic slurs, personal insults, obscenity, or engage in any conduct that would not be acceptable in the workplace consistent with CARIE’s anti-discrimination and anti-harassment policies.
- Reveal private information (e.g., social security #’s, home addresses, medical information, and so forth) about others. This is not intended to restrict employees from communicating with fellow employees regarding the terms and conditions of employment; however, employees should always be mindful of the privacy of other employees when using social media.
- Disclose, post, or refer to any confidential or proprietary information of or about CARIE, its board, staff or volunteers, vendors, or clients, including, but not limited to, business and financial information, services, business transactions, strategies, processes and procedures, intellectual property such as designs, ideas, or innovations, and organization-issued documents.
- Post the name, trademark, or logo of CARIE or any vendor, client or other business with a connection to the organization without the express permission of the Executive Director.
- Represent that you are communicating the views of the organization or submit postings that might reasonably create the impression that you are communicating on behalf of or as a representative of the organization without the express permission of the Executive Director.

Nothing in our Social Networking Guidelines is intended to prohibit or restrict employees from communicating with fellow employees regarding the terms and conditions of their employment or otherwise prohibit or infringe upon an employee’s rights under the National Labor Relations Act or any other federal or state statute protecting employee workplace rights. **WHEN IN DOUBT, ASK BEFORE YOU ACT.** It is impossible to list all forms of online behavior that may raise concerns or potentially injure the organization’s reputation or legal standing. If you are not sure if certain conduct online is appropriate or legal, please consult with the Executive Director. Users who violate CARIE’s Social and Professional Networking Guidelines may be subject to discipline, up to and including termination of employment. Waiver of enforcement of these Guidelines in some situations does not prohibit enforcement of the Guidelines in others.

12.4 Software

Unauthorized copying or use of software and other data, games, videos or music ("Software") on and/or from CARIE's equipment is strictly prohibited. Violations may subject both the individual and the Organization to civil fines, damages, and criminal liability. Users may not use Agency facilities or equipment knowingly to download or distribute pirated Software.

No user shall use Software or image files downloaded onto CARIE's equipment from the Internet that have not been released for public use unless it has been cleared and approved in advance by management and a written contract for the files has been approved.

13. WHISTLEBLOWER AND ANTI-RETALIATION POLICY

13.1 Whistleblower

CARIE's Code of Ethics requires employees and Board members to practice high standards of business and personal ethics in the conduct of their duties and responsibilities on behalf of CARIE. If an employee reasonably believes that some policy, practice or activity of CARIE is in violation of the law or in breach of an ethical obligation, the employee should report the suspected violation to the Compliance Officer, Executive Director or Board Chair. The suspected violation may be reported anonymously and all reports will only be disclosed to those individuals necessary to conduct an extensive investigation. All reports will be investigated promptly and if warranted, corrective action will be taken. Confidentiality will be maintained throughout the investigative process to the extent practicable and consistent with the need to undertake a full investigation.

CARIE intends to comply with all laws and regulations that apply to the organization. The support of all employees is necessary to achieving compliance with these various laws and regulations, and with its Code of Ethics.

13.2 Anti-Retaliation

CARIE prohibits any form of retaliation against employees who, in good faith and for lawful purposes, report to CARIE any conduct or activity that may violate any law applicable to CARIE or CARIE's business or any other suspected improper, unethical or illegal conduct or activities by anyone at CARIE. CARIE also prohibits any form of retaliation against employees who provide information, cause information to be provided, or assist in an investigation conducted by CARIE or any regulatory or law enforcement organization or legislative body regarding a possible violation of any law or any other suspected improper, unethical or illegal conduct or activities by anyone at CARIE.

13.3 Management Responsibility

All Managers are responsible for ensuring adherence to this no-retaliation policy. In addition, each Manager is responsible for communicating this policy to employees under the manager's supervision and for supporting programs and practices designed to develop understanding of, commitment to and

compliance with this policy. In the event that any supervisor or Manager believes that a violation of this policy has occurred or receives a report of a violation, he or she must immediately contact the Compliance Officer, the Executive Director, or the Board Chair.

13.4 Procedures for Reporting Policy Violations

If an employee believes that there has been retaliation against the employee (including threatened or harassed) in violation of this policy, a report should be made immediately to the immediate supervisor, the Executive Director or the Board Chair. Once an employee reports retaliation prohibited by this policy, CARIE will promptly investigate the matter. The investigation will be handled as discreetly as practicable, allowing for a fair investigation and any necessary corrective action. Appropriate corrective action will be taken whenever a violation of this policy is determined to have occurred. Depending on the nature of the violation, the offending individual can be subject to disciplinary action up to and including termination. In addition, anyone who interferes with an investigation, or provides information in an investigation that the individual knows to be untrue or inaccurate, will be subject to disciplinary action, up to and including termination of employment. Retaliation against employees who in good faith file a complaint or participate in an investigation is strictly prohibited.

ACKNOWLEDGEMENT

I acknowledge that I have received a copy of the CARIE Employment Policies and Procedures Manual, and I do commit to read and follow these policies.

I am aware that if, at any time, I have questions regarding CARIE employment policies I should direct them to my supervisor.

I understand that my employment with CARIE is at-will. I have the right to resign at any time with or without cause, just as CARIE may terminate my employment at any time with or without cause or notice, subject to applicable laws. I understand that nothing in the Manual or in any oral or written statement alters the at-will relationship, except by written agreement signed by the Executive Director. I know that CARIE employment policies and other related documents do not form a contract of employment and are not a guarantee by CARIE of the conditions and benefits that are described within them. Nevertheless, the provisions of such policies are incorporated into this acknowledgment, and I agree that I shall abide by its provisions.

I also am aware that CARIE, at any time, may on reasonable notice, change, add to, or delete from the provisions of the company policies.

Employee's Printed Name

Position

Employee's Signature

Date

