



OPENING DOORS TO HOPE, HEALTH AND HOUSING

EMPLOYEE HANDBOOK

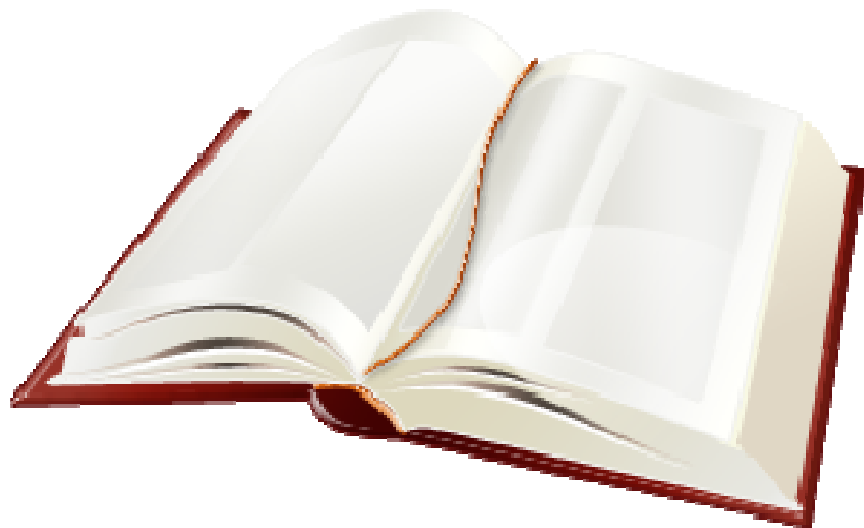


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VICTORY PROGRAMS' MISSION STATEMENT

Victory Programs opens doors to recovery, hope and community to individuals and families facing homelessness, addiction and other chronic illnesses.

VICTORY PROGRAMS' STANDARDS OF EXCELLENCE

We communicate effectively

We respond with patience

We respect boundaries

We use authority appropriately

We respect confidentiality

We apply policies and procedures in a fair and consistent manner

We do not tolerate discrimination

We individualize treatment

We are attentive to clients' needs

We work with clients from a strengths-based perspective

FOREWORD

Whether you have just joined our staff or have been at Victory Programs for a while, we are confident that you will find our company a dynamic and rewarding place in which to work and we look forward to a productive and successful association. We consider the employees of Victory Programs to be one of its most valuable resources. This manual has been written to serve as the guide for the employer/employee relationship.

There are several things that are important to keep in mind about this handbook. First, it contains only general information and guidelines. It is not intended to be comprehensive or to address all the possible applications of, or exceptions to, the general policies and procedures described. For that reason, if you have any questions concerning eligibility for a particular benefit, or the applicability of a policy or procedure, you should address your specific questions to the Human Resources Department. In applying policies, procedures, and benefits, Victory Programs will make decisions based on its assessment of its needs and consideration of the specific facts and circumstances presented by each situation. Neither this handbook nor any other Victory Programs document, confers any contractual right, either express or implied, to remain in the Victory Programs' employ. Nor does it guarantee any fixed terms and conditions of your employment. Your employment is not for any specific time and may be terminated at will, with or without cause and without prior notice, by Victory Programs or you may resign for any reason at any time. No supervisor or other representative of Victory Programs (except the President/Executive Director) has the authority to enter into any agreement for employment for any specified period of time, or to make any agreement contrary to the above.

Second, the procedures, practices, policies and benefits described here may be modified or discontinued from time to time. We will inform you of any changes as they occur.

Finally, some of the subjects described here are covered in detail in official policy documents. You should refer to these documents for specific information, since this handbook only briefly summarizes those benefits. Please note that the terms of the written insurance policies are controlling.

EXECUTIVE STATEMENT TO ALL VICTORY PROGRAMS' EMPLOYEES

Victory Programs considers our employees to be our most important asset and most valuable resource. Our mission is achieved effectively through the daily caring, direct and indirect interactions between employees and our valued customers – the clients, tenants and consumers receiving any support or services at Victory Programs.

Every employee is an ambassador of Victory Programs. You are our best representative of our standards of excellence and in demonstrating our philosophy of care whether internally at Victory Programs or externally with our community, affiliates and partners.

It is our commitment to and investment in each employee that you are given a comprehensive orientation, on-going training and professional development opportunities, consistent goal specific supervision, and the support and guidance no matter what your position, program or department to improve your skills, increase your knowledge base and build on your experience as a professional.

In turn, we ask for your full participation, partnership and mutual support in always making Victory Programs the best it can be for our clients, community and for you our employees.

INTRODUCTION

EQUAL EMPLOYMENT OPPORTUNITY

Equal Employment Opportunity has been, and will continue to be, a fundamental principle at Victory Programs, where employment is based upon personal capabilities and qualifications without discrimination because of race, color, religion, sex, sexual orientation, age, national origin, disability, genetic history, military status, or any other protected characteristic as established by law.

This policy of Equal Employment Opportunity applies to all policies and procedures relating to recruitment and hiring, compensation, benefits, termination and all other terms and conditions of employment.

The Human Resources Department has overall responsibility for this policy and maintains reporting and monitoring procedures. Employees' questions or concerns should be referred to the Human Resources Department.

Appropriate disciplinary action up to and including termination may be taken against any employee willfully violating this policy.

NON-DISCRIMINATION AND ANTI-HARASSMENT POLICY

Victory Programs is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Therefore, Victory Programs expects that all relationships among persons in the workplace will be business-like and free of bias, prejudice and harassment.

Equal Employment Opportunity

It is the policy of Victory Programs, to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, national origin, religion, sex, sexual orientation, age, disability, genetic history, military status, or any other characteristic protected by law. Victory Programs prohibits and will not tolerate any such discrimination or harassment.

Definitions of Harassment

a. Sexual harassment constitutes discrimination and is illegal under federal, state and local laws. For the purposes of this policy, sexual harassment is defined, as in the Equal Employment Opportunity Commission Guidelines, as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example: (i) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; ii) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (iii) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment may include a range of subtle and not so subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include, but are not limited to: unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering, catcalls or touching; insulting or obscene comments or gestures; display or circulation in the workplace of sexually suggestive objects or pictures (including through e-mail); and other physical, verbal or visual conduct of a sexual nature. Sex-based harassment that is, harassment not involving sexual activity or language (e.g., male manager yells only at female

employees and not males) may also constitute discrimination if it is severe or pervasive and directed at employees because of their sex.

b. Harassment on the basis of any other protected characteristic is also strictly prohibited. Under this policy, harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her protected status, and that: (i) has the purpose or effect of creating an intimidating, hostile or offensive work environment; (ii) has the purpose or effect of unreasonably interfering with an individual's work performance; or (iii) otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes, but is not limited to: epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes and display or circulation in the workplace of written or graphic material that denigrates or shows hostility or aversion toward an individual or group (including through e-mail).

Retaliation Is Prohibited

Victory Programs prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports. Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action up to and including termination.

Reporting an Incident of Harassment, Discrimination or Retaliation

Victory Programs strongly urges the reporting of all incidents of discrimination, harassment or retaliation, regardless of the offender's identity or position. Individuals who believe they have experienced conduct that they believe are contrary to Victory Programs policy or who have concerns about such matters should file their complaints with their immediate supervisor or the Director Human Resources Department as soon as possible. Individuals should not feel obligated to file their complaints with their immediate supervisor first before bringing the matter to the attention of Human Resources.

Early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment. Therefore, while no fixed reporting period has been established, Victory Programs strongly urges the prompt reporting of complaints or concerns so that rapid and constructive action can be taken. Victory Programs will make every effort to stop alleged harassment, but can only do so with the cooperation of its staff/employees.

The availability of this complaint procedure does not preclude individuals who believe they are being subjected to harassing conduct from promptly advising the offender that his or her behavior is unwelcome and requesting that it be discontinued.

The Investigation

Any reported allegations of harassment, discrimination or retaliation will be investigated promptly, thoroughly and impartially. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge.

Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action.

Employees are expected to cooperate fully with any investigation.

Responsive Action

Misconduct consisting of harassment, discrimination or retaliation will be dealt with promptly and appropriately. Responsive action may include, for example, training, referral to counseling, monitoring of the offender and/or disciplinary action such as warning, reprimand, withholding of a promotion or pay increase, reduction of wages,

demotion, reassignment, temporary suspension without pay or termination, as Victory Programs believes appropriate under the circumstances.

* * * *

If an employee making a complaint does not agree with its resolution, the employee may appeal to the Executive Director. His/her decision will be final.

In addition to the above, if you believe you have been subjected to harassment, you may file a complaint with either or both of the government agencies set forth below. Those agencies are:

Equal Employment Opportunity Commission
JFK Federal Building, Room 475
Boston, Massachusetts 02203
or the
Massachusetts Commission Against Discrimination, Boston Office
One Ashburton Place, Room 60 I
Boston, Massachusetts 02108
or
Springfield Office
424 Dwight Street
Springfield, Massachusetts 01103

AMERICANS WITH DISABILITIES ACT POLICY STATEMENT

Victory Programs is committed to complying with all applicable provisions of the *Americans with Disabilities Act* ("ADA"). It is the policy not to discriminate against any qualified employee or applicant with regard to any terms or conditions of employment because of such individual's disability or perceived disability so long as the employee can perform the essential functions of the job. Consistent with this policy of nondiscrimination, Victory Programs will provide reasonable accommodations to a qualified individual with a disability, as defined by the ADA, who has made the agency aware of his or her disability, provided that such accommodation does not constitute an undue hardship.

Employees with a disability who believe they need a reasonable accommodation to perform the essential functions of their job should contact the Human Resources Department. Victory Programs encourages individuals with disabilities to come forward and request reasonable accommodation. You may be asked for documentation about your disability and possible accommodations. Victory Programs may ask to speak with your physician, health care provider, or other professional to help assess the proposed accommodation and to ensure you can safely perform the essential functions of your job with accommodations.

ACCEPTANCE OF GIFTS

No employee may solicit or accept gifts. Special care must be taken to avoid even the impression of a conflict of interest.

An employee may entertain potential or actual customers if such entertainment is consistent with accepted business practices, does not violate any law or generally accepted ethical standards and the public disclosure of facts will not embarrass the agency. Any questions regarding this policy should be addressed to the Human Resources Department.

WORK PRODUCT OWNERSHIP

All employees must be aware that Victory Programs retains legal ownership of the product of their work. No work product created while employed can be claimed, construed, or presented as property of the individual, even after employment has terminated or the relevant project completed. This includes written and electronic documents, audio and video recordings, and also any concepts, ideas, or other intellectual property developed for Victory Programs, regardless of whether the intellectual property is actually used. Although it is acceptable for an employee to display and/or discuss a portion or the whole of certain work product as an example in certain situations (e.g., on a resume), one must bear in mind that information classified as confidential must remain so even after the end of employment, and that supplying certain other entities with certain types of information may constitute a conflict of interest or breach of confidentiality. In any event, it must always be made clear that work product is the sole and exclusive property of Victory Programs. Consultants and temporary employees must be particularly careful in the course of any work they discuss doing, or actually do, for a competitor of Victory Programs.

CONFIDENTIAL NATURE OF WORK

All records and information relating to Victory Programs or its clients are confidential and employees must, therefore, treat all matters accordingly. No agency or agency-related information, including without limitation, documents, notes, files, records, oral information, computer files or similar materials (except in the ordinary course of performing duties on behalf of Victory Programs).

WHISTLEBLOWER POLICY

Victory Programs, Inc. (“VPI”) – Code of Conduct requires employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the VPI, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all employees to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No employee who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within VPI prior to seeking resolution outside the organization.

Reporting Violations

VPI maintains an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee’s supervisor is in the best position to address an area of concern. However, if an employee is not comfortable speaking with her or his supervisor or is not satisfied with the supervisor’s response, the employee is encouraged to speak with the Executive Director or anyone in management whom she or he is comfortable approaching. Supervisors and managers are required to report suspected violations of the Code of Conduct to the Executive Director, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when the employee is uncomfortable or not satisfied with following the Organization’s open door policy, he or she should contact the Executive Director directly. If the employee cannot approach the Executive Director because the Executive Director may be the subject of concern, the employee should address the concerns with the President of the Board of Directors.

Accounting and Auditing Matters

The Finance Committee of the board of directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Executive Director shall immediately notify the Finance Committee of any such complaint and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The Executive Director will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

EMPLOYMENT

INITIAL EMPLOYMENT PERIOD

Every new employee goes through an initial period of adjustment in order to learn about the agency and about his/her job. During this time the employee will have an opportunity to find out if he/she is suited to, and likes, his/her new position.

Additionally, the orientation employment period gives the employee's supervisor a reasonable period of time to evaluate his/her performance. The initial employment period is six months.

During this time, the new employee will be provided with training and guidance from his/her supervisor. He/she may be discharged at any time during this period if his/her supervisor concludes that he/she is not progressing or performing satisfactorily. Under appropriate circumstances, the initial employment period may be extended. Additionally, as is true at all times during an employee's employment with the agency, employment is not for any specific time and may be terminated at will, with or without cause and without prior notice.

EMPLOYEE CATEGORIES

Based on the conditions of employment, employees of Victory Programs fall into the following categories:

- Full-Time
- Part-Time
- Relief/Per Diem
- Temporary Employees

Full-Time

A full-time employee is regularly scheduled to work 8 hours per day, 5 days per week.

Exempt employees are classified as such because they perform specific types of job duties, such as those classified as administrative, professional or executive. Exempt employees are not eligible for overtime pay. They are paid a salary based on the results they are expected to accomplish and not based on the hours they work.

Non-Exempt employees are paid on an hourly basis and are paid overtime for all hours worked in excess of 40 in a workweek.

Part-Time

Part-time employees are classified as exempt or non-exempt and work a regular schedule of 20 hours or more but less than 40 hours per week.

Relief/Per Diem

Relief/Per Diem are part-time employees with no regular schedule and on call as needed. Relief/Per Diem employees do not receive any additional compensation or benefits provided by the agency.

Temporary Employees

A temporary employee is typically hired to work on a specified project or for a relatively short duration. A temporary employee in a non-exempt position is paid by the hour while a temporary employee in an exempt position is paid according to the terms of hire for that individual. Temporary employees do not receive any additional compensation or benefits provided by the agency.

JOB DESCRIPTIONS

To assist in orienting you to your job, Victory Programs has prepared a job description for your position that contains the major duties and responsibilities for your position.

Moreover, from time to time, modifications in jobs will occur to reflect temporary or long-term changes in staffing or operational needs of your program or work area. Please keep in mind that you may be assigned duties, responsibilities and functions even though the duties have not been your in the past, or are not specifically mentioned in your job description.

WORK SCHEDULES

Work Schedules may vary from one department to another based on the needs of Victory Programs. Your supervisor will determine your work schedule and any changes or modifications. The basic workweek for full-time employees is forty (40) hours and the normal workday is 8 hours.

There may be occasions when you are required to remain on duty past the end of your shift. If the next schedule staff person fails to arrive, you are to contact the Program Director or an appropriate supervisor. In those instances where a shift would be uncovered due to failure of the next scheduled staff to arrive you are required to remain at the program site until coverage has arrived. If a staff person fails to adhere to this guideline and leaves the clients unattended he/she would be subject to disciplinary action up to and including termination.

TRANSFERS AND PROMOTIONS

Victory Programs encourages employees to assume higher-level positions for which they qualify. Toward this end, Victory Programs has a job posting program that offers employees the opportunity to apply for open positions within the agency.

Generally, employees must be in their job for at least one year before applying for a change in position. In addition, employees must have a good performance, attendance and punctuality record. Employees who have received a warning about job performance are ineligible for promotions or transfer until six months from the date of warning or until the performance issue is resolved.

Each transfer is judged on an individual basis, depending on the needs of both departments involved.

Employees who wish to apply for a transfer should discuss it first with their supervisor/manager and the Human Resources Department so that it may be determined if their skills fit the requirements of the desired job. Employees should also feel free to discuss their career aspirations with their supervisor/manager or the Human Resources Department at any time.

All final decisions regarding transfers will be made by Management, in conjunction with the Human Resources Director.

WORK FORCE REDUCTION

Although layoffs are not common practices of our agency it may, become necessary to reduce our workforce. In the event Victory Programs is required to reduce its work force, the agency will balance the needs of Victory Programs, our mission, and the needs of the clients. Other factors that will be considered are the qualifications, experience and demonstrated performance of existing staff members. When all other factors are approximately the same, agency seniority will generally be the determining factor in making layoff decisions. Whenever possible at least a 2-week notice will be given.

COMPENSATION

SALARIES AND WAGES

Victory Programs strives to offer its employees fair, equitable, and competitive wages and salaries commensurate with their ability, resources and sound policy. As a private non-profit organization, Victory Programs is dependent to a large extent on the level of funding from third parties, including the Commonwealth of Massachusetts. Consequently, changes or modifications to employee salaries may be required from time to time.

PAYMENT OF WAGES/SALARY

The payroll period begins on Saturday and ends on Friday. Employees will be paid every other Friday.

It is Victory Programs' policy that employee paychecks will only be given personally to that employee. All other arrangements for mailing or pick-up must be made in advance and in writing with the Human Resources Department.

If the normal payday falls on an agency-recognized holiday, paychecks will be distributed one workday prior to the aforementioned schedule. Under no circumstances will the agency release any paychecks prior to the announced schedule.

Employees may be paid by check or through direct deposit of funds to either a savings or checking account at their bank of choice (providing the bank has direct deposit capability). To activate direct deposit, a Direct Deposit Authorization form from Human Resources may be obtained. The completed form must then be returned with a voided personal check to the Human Resources Department. Due to banking requirements it may take several weeks for activation of the Direct Deposit.

In the event of a lost paycheck, the Human Resources Department must be notified in writing as soon as possible before a replacement check can be issued. The first lost check will be reissued at no cost. Subsequent lost checks will be reissued at a cost to the employee of \$25.00. In the event the lost paycheck has been cashed and the agency identifies the endorsement as that of the employee, the employee must remit the amount of the replacement check to the agency within 24 hours of the time it is demanded.

A statement of earnings is given each pay period to employees indicating:

- Gross Pay
- Statutory Deductions
- Voluntary Deductions

The amount of Federal Withholding is affected by the number of exemptions claimed on Form W-4, Employee's Withholding Allowance Certificate. If an employee's marital status changes or the number of exemptions previously claimed increases or decreases, a new Form W-4 must be submitted to the Human Resources Department.

Except for extreme emergencies no salary advances will be made.

PAY AND OVERTIME

The payroll period begins on Saturday and ends on Friday. Employees will be paid every other Friday. Under the Fair Labor Standards Act, jobs fall into two major categories, "exempt" and "non-exempt". All non-exempt positions are paid on an hourly basis and are paid overtime. Exempt positions must meet certain requirements and are paid on a salary basis without overtime.

From time to time, you may be required to work in excess of forty (40) hours. If you are paid on an hourly basis, you will be paid at the rate of time and one-half your regular hourly rate for all hours worked in excess of forty (40) in the workweek. Your supervisor must authorize all overtime in advance. If you are paid on a salary basis, you will not receive overtime pay.

Additionally, compensatory time is neither accumulated nor reimbursed, and cannot be granted by anyone in the agency.

Depending on agency work needs, employees may be required to work overtime when requested to do so. Prior approval of a supervisor, however, is required before any non-exempt employee works overtime. Employees working overtime without approval will be subject to disciplinary action up to and including termination.

“SAFE HARBOR” PAYROLL DEDUCTION

Exempt Employees are paid on a salary basis. It is the policy of Victory Programs, Inc. to make deductions from the pay of salaried employees only where the Fair Labor Standards Act, or Department of Labor regulations pursuant to the law permitting such deductions.

If a salaried employee believes that an improper deduction has been made from his/her salary, he/she may submit a complaint to the Human Resources Department. Any such complaint will be investigated promptly and the employee shall be informed of the results of the investigation.

If it is determined that an improper deduction has been made, any affected employee will be reimbursed for the amount of the improper deduction.

TIME RECORDS

The attendance and hours worked of all employees is recorded daily by each employee and is submitted to payroll by noon on Monday of the pay week. Our attendance records are considered legal documents, and care must be exercised in recording the hours worked, overtime hours, and absences. Violations of this policy may result in appropriate disciplinary action, up to and including immediate discharge.

All non-exempt employees must record the time they arrived/departed, each day, on his/her time sheet. Time sheets must not be recorded in advance. Each employee is responsible only for his/her own recordkeeping.

A 30-minute meal break will be scheduled by your supervisor as appropriate. Employees must sign out upon taking their meal break and sign back in upon their return to work.

Non-exempt employees must calculate their overtime on a weekly basis (see overtime section for further explanation). An employee's supervisor must approve each overtime entry; employees with overtime entries that do not have prior approval will be subject to disciplinary action up to and including termination.

Corrections of Errors in Pay

The policy of Victory Programs is to comply with federal and state laws governing payment of wages, and Victory Programs makes every effort to ensure employees are paid correctly. Occasionally, however, mistakes may happen. When mistakes occur, you should call them to our attention immediately. We will promptly investigate the issue and make any corrections necessary.

Please review your paycheck and pay stub when you receive them. If you believe a mistake has occurred or an improper deduction has been made, or if you have any questions, please contact your supervisor or Human Resources immediately. Victory Programs will promptly investigate reports of incorrect pay or improper deductions. If Victory Programs determines that an error has occurred, it will promptly correct the matter.

EMPLOYEE REFERRAL PROGRAM

Victory Programs is always exploring innovative methods to recruit qualified staff and appreciates recommendations made by existing employees. If you recommend someone who is hired on a full-time, regular basis and who is still employed by the agency after 30 days, you are eligible to be paid a recruiting bonus. This may be changed from time to time depending on existing market conditions. The current referral fee for a full-time employee is \$150.00 and \$25.00 for a benefit eligible part-time employee. There is no bonus for the recruitment of per diem or relief staff unless they become regular full or part time benefit eligible employees within 3 months of hire.

The potential employee should list the name of the staff person who is referring them on the application. **You will not receive a referral bonus if your name is not listed on the application.** The bonus will be paid automatically after the employee has worked 30 days for the agency provided the employee is still an employee of Victory Programs. Bonuses are issued through payroll and are subject to all state and federal taxes.

PERSONNEL RECORDS

Employees are allowed to review their personnel file within five business days of Human Resources receiving a written request to do so on two separate occasions in a calendar year. However, if that notification and review is related to the placing of negative information in the personnel record it will not count toward two time limits.

To keep necessary agency records up to date, it is extremely important that you notify the Human Resources Department of any changes in:

- Name and/or marital status
- Address and/or telephone number
- # of eligible dependents
- W-4 deductions
- Person to contact in case of emergency

CRIMINAL OFFENDER RECORD INFORMATION

Victory Programs reviews applicants' Criminal Offender Record Information ("CORI") as authorized by the Criminal History Systems Board ("CHSB"). Victory Programs' policy regarding such CORI reviews is as follows:

1. Victory Programs will verify an applicant's identity with a government-issued photographic form of identification and will maintain a copy of the identification.
2. Victory Programs will notify an applicant if Victory Programs intends to reject an applicant due to CORI results. Victory Programs will also provide a copy of the CORI report to the applicant along with a copy of Victory Programs' CORI policy and a copy of the CHSB's *Information Concerning the Process in Correcting a Criminal Record*.
3. Victory Programs will identify for the applicant the portion of the CORI results that Victory Programs determines makes the applicant ineligible for the position for which s/he is applying. Victory Programs will give the applicant an opportunity to dispute the accuracy and the relevance of the CORI results.
4. If the applicant and/or the CHSB provide additional documentation regarding the applicant's CORI results, Victory Programs will consider the information and will inform the applicant of Victory Programs' decision.
5. Victory Programs will document the steps it takes to comply with the process set forth above.

TIME OFF

VACATION TIME AND SICK TIME POLICY FOR STAFF WORKING AT LEAST 20 REGULARLY SCHEDULED HOURS PER WEEK (Effective January 1, 2016)

Years of Service	Maximum Vacation days	Maximum Vacation hours
0 - 2	19	152
3 - 5	21	168
5 -7	23	184
7+	25	200

Vacation time is to be used for planned vacation, personal time or extended bereavement leave. Use of vacation time must be approved in advance by the employee's supervisor. Vacation time will not be approved during the first three months of employment.

An employee should make his/her vacation request at least 14 days in advance or as far in advance as possible, based upon program needs. Victory Programs will attempt to grant an employee the vacation dates he/she requests. Employees may not use vacation time on a regular basis to shorten the workday or workweek.

When an agency holiday falls during a scheduled vacation, it is not counted as a vacation day.

Regular part-time employees, regularly scheduled to work at least 20 hours per week, are eligible for vacation time on a pro-rated basis.

Vacation time is earned and accrued on a bi-weekly basis. It may be carried forward from year to year. However, once an employee's accrued vacation time reaches his/her annual maximum, the employee will not earn additional vacation time until the employee uses some of his/her vacation time and his/her accrued vacation drops below the maximum earned cap. An employee's total accrued vacation time will never exceed the maximum earned amount set forth in the table above. For this reason, employees are encouraged to keep track of their vacation accruals and to schedule and take vacation on a regular basis.

Under no circumstances may an employee borrow vacation time from a future calendar year. Employees may not receive payment for accrued, unused vacation, except at termination.

During a resignation period, use of vacation time is not allowed unless prior authorization was established in writing with the employee's direct manager in advance of any time taken.

Victory Programs reserves the right to request a rescheduling of any pre-approved vacation.

Accrual during Leaves

Employees **do not** accrue vacation time during **unpaid** leaves of absence.

Payment of Accrued Vacation

On termination, employee will be paid for any accrued, unused vacation time.

Accrual of Sick Time

All employees of Victory Programs, Inc. whose primary place of employment is Massachusetts are eligible to accrue and use paid sick time. Sick time accrues at the rate of one hour for every thirty hours worked, up to a maximum of 40 hours in a calendar-year period. For accrual purposes, exempt employees will be assumed to work 40 hours per week unless they are normally scheduled to work fewer than 40 hours, in which case earned sick time accrues based on their regular schedule. Up to 40 hours of unused sick time may be carried over into the following year.

Use of Sick Time

Employees may **not earn or use more than 40 hours** of accrued sick time per fiscal year. Accrual of sick time begins on the employee's date of hire, but employees may not use such earned sick time until 90 days after their start date.

Sick time is provided to allow employees to:

1. care for employee's own physical or mental illness, injury, or other medical condition that requires home, preventative or professional care;
2. care for a child, parent, spouse, or parent of a spouse who is suffering from a physical or mental illness, injury, or other medical condition that requires home, preventative or professional care;
3. attend routine medical and dental appointments for themselves or for their child, parent, spouse, or parent of a spouse; and
4. address the psychological, physical, or legal effects of domestic violence.

Use of sick time for other purposes is prohibited.

Employees may not use sick time if the employee is not scheduled to be at work during the period of use. An employee may not accept a specific shift assignment with the intention of calling out sick for all or part of that shift.

Earned sick time may be used for full or partial day absences. The smallest amount of sick time that an employee can take is one hour. Sick time cannot be used as an excuse to be late for work without notice of an authorized purpose. If an employee's absence from work requires the Victory Programs to call in a replacement worker to cover the absent employee's job functions, Victory Programs may require the absent employee to use an equal number of hours of sick time as were worked by the replacement.

Unused sick time can be carried forward into the next fiscal year. However, once an employee has earned 40 hours of sick time, s/he will cease to accrue additional sick time until the employee's sick time balance drops below 40 hours. **An employee will not be able to use more than a total of 40 hours of sick time in a calendar year.**

Absence Notification Procedures

If an employee determines that the employee needs to be absent, to be late or to leave work early, the employee must give advance notice to his or her supervisor whenever such time off is foreseeable. Notice should be provided in person, by telephone or e-mail.

If the absence is foreseeable (for example, if the employee will be absent to attend a previously scheduled appointment), the employee must provide seven days advance notice, or more if possible.

If the absence is not foreseeable, the employee must provide notice to his or her supervisor at least three hours before the start of the employee's shift unless such notice is not feasible due to accidents or sudden illness. In such circumstances, notice must be provided as soon as practicable.

If an employee is going to be absent on multiple days, the employee or the employee's surrogate (e.g., spouse, adult family member or other responsible party) must provide notice of the expected duration of the leave or, if unknown, provide notice on a daily basis, unless the circumstances make such notice unreasonable.

Verification of Use of Sick Time

Victory Programs, Inc. will generally require an employee to submit a doctor's note or other documentation to support the use of sick time if the absence:

- a. exceeds 24 consecutively scheduled work hours or three consecutive days on which the employee is scheduled to work;
- b. occurs within two weeks prior to an employee's final scheduled day of work (except in the case of temporary employees); or.
- c. occurs after four unforeseeable and undocumented absences within a three month period.

In other circumstances, Victory Programs, Inc. may, at its discretion, require the employee to personally verify in writing that they have used sick time for an allowable purpose.

Required documentation must be submitted within seven days of the absence. Additional time may be granted for good cause shown.

If an employee fails to timely comply with Victory Programs documentation requirements, we may recoup the sick time paid from future wages.

In cases where Victory Programs has a reasonable belief that the employee's return to work could present a significant risk of harm to the employee or others, the employee may be required to provide a fitness for duty certificate prior to returning to work.

Expectations Regarding Attendance

Employees should remember that regular, reliable attendance and timeliness is expected. If an employee is repeatedly absent, late or leaves work early for reasons not covered by earned sick time, is absent or tardy for more than 40 hours in a year, uses sick time for illegitimate purposes, or exhibits a clear pattern of taking sick time on days just before or after a weekend, vacation or holiday, the employee may be subject to disciplinary action up to and including termination.

If an employee is absent from work the day before or after a scheduled holiday other than on a pre-approved vacation, the employee will not receive holiday pay.

Payout of Sick Time

Sick time is not payable on termination of employment.

Interaction with Other Types of Leave

If any time off covered under this policy is also covered under the Victory Programs FMLA, Parental Leave, Domestic Violence Leave, SNLA leave or other leave of absence policies, sick time shall run concurrently with such leave. Employees may choose to use, and Victory Programs may also require employees, to use earned sick time to receive pay for absences under other leave policies if those absences would otherwise be unpaid.

UNSCHEDULED USE OF EARNED TIME

Unscheduled absences impose a hardship on both the employee's department and the other employees working in it. Consequently, unscheduled absences and use of earned time should be minimized. Unscheduled use of earned time

should be limited to unexpected personal or family illness or accident, or for other compelling personal reasons. The use of unscheduled earned time is subject to the approval of the employee's immediate supervisor. The fact that you received earned time pay or notified your supervisor of an absence does not insulate you from a review of your total number and/or frequency of absences. Unscheduled absences without satisfactory reason, an excessive number of unscheduled absences, or failure to provide required notice may result in disciplinary action up to and including termination.

SICK LEAVE POLICY FOR STAFF WORKING LESS THAN 20 REGULARLY SCHEDULED HOURS PER WEEK

Accrual of Sick Time

Employees whose primary place of employment is Massachusetts and who are regularly scheduled to work less than 20 hours per week are eligible to accrue and use paid sick time. Sick time for these employees accrues at the rate of one hour for every thirty hours worked per fiscal year, up to a maximum of 40 hours. For accrual purposes, exempt employees will be assumed to work 40 hours per week, unless they are normally scheduled to work fewer than 40 hours, in which case earned sick time accrues based on their regular schedule. Up to 40 hours of unused sick time may be carried over into the following year.

Use of Sick Time

Employees may not earn or use more than 40 hours of paid sick time per fiscal year. Accrual of sick time begins on the employee's date of hire, but employees may not use such earned sick time until 90 days after their start date

Sick time is provided to allow employees to:

1. care for employee's own physical or mental illness, injury, or other medical condition that requires home, preventative or professional care;
2. care for a child, parent, spouse, or parent of a spouse who is suffering from a physical or mental illness, injury, or other medical condition that requires home, preventative or professional care;
3. attend routine medical and dental appointments for themselves or for their child, parent, spouse, or parent of a spouse; and
4. address the psychological, physical, or legal effects of domestic violence.

Use of sick time for other purposes is not allowed and may result in an employee being disciplined.

Employees may not use sick time if the employee is not scheduled to be at work during the period of use. An employee may not accept a specific shift assignment with the intention of calling out sick for all or part of that shift.

Earned sick time may be used for full or partial day absences. The smallest amount of sick time that an employee can take is one hour. Sick time cannot be used as an excuse to be late for work without notice of an authorized purpose. If an employee's absence from work requires the Company to call in a replacement worker to cover the absent employee's job functions, the Company may require the absent employee to use an equal number of hours of sick time as were worked by the replacement.

Absence Notification Procedures

If an employee determines that the employee needs to be absent, to be late or to leave work early, the employee must give advance notice to his or her supervisor. Notice should be provided in person, by telephone or e-mail.

If the absence is foreseeable (for example, if the employee will be absent to attend a previously scheduled appointment), the employee must provide seven days advance notice, or more if possible.

If the absence is not foreseeable, the employee must provide notice to his or her supervisor at least 3 hours before the start of the employee's shift. If 3 hours is not feasible under the circumstances, notice must be provided as soon as practicable.

If an employee is going to be absent on multiple days, the employee or the employee's surrogate (e.g., spouse, adult family member or other responsible party) must provide notice of the expected duration of the leave or, if unknown, provide notice on a daily basis, unless the circumstances make such notice unreasonable.

Verification of Use of Sick Time

Victory Programs, Inc. will generally require an employee to submit a doctor's note or other documentation to support the use of sick time if the absence:

- a. exceeds 24 consecutively scheduled work hours or three consecutive days on which the employee is scheduled to work;
- b. occurs within two weeks prior to an employee's final scheduled day of work (except in the case of temporary employees); or
- c. occurs after four unforeseeable and undocumented absences within a three month period.

In other circumstances, Victory Programs, Inc. may, at its discretion, require the employee to personally verify in writing that they have used sick time for an allowable purpose.

Required documentation must be submitted within seven days of the absence. Additional time may be granted for good cause shown.

If an employee fails to timely comply with Victory Programs, Inc. documentation requirements, we may recoup the sick time paid from future wages.

In cases where Victory Programs, Inc. has a reasonable belief that the employee's return to work could present a significant risk of harm to the employee or others, the employee may be required to provide a fitness for duty certificate prior to returning to work.

Expectations Regarding Attendance

Employees should remember that regular, reliable attendance and timeliness is expected. If an employee is repeatedly absent, late or leaves work early for reasons not covered by earned sick time, is absent or tardy beyond the paid sick time accrued, commits fraud or abuse by engaging in an activity that is not consistent with allowable purposes for sick time or exhibits a clear pattern of taking sick time on days just before or after a weekend, vacation or holiday, the employee may be subject to disciplinary action.

If an employee is absent from work the day before or after a scheduled holiday, the employee will not receive holiday pay.

Payout of Sick Time

Sick time is not payable on termination of employment.

Interaction with Other Types of Leave

If any time off covered under this policy is also covered under the Victory Programs, Inc. FMLA, Parental Leave, Domestic Violence Leave, SNLA leave or other leave of absence policies, sick time shall run concurrently with such leave. Employees may choose to use, and Victory Programs, Inc. may also require employees to use earned sick time to receive pay for absences under other leave policies if those absences would otherwise be unpaid and the circumstances causing the absence are covered by the sick time policy set forth above.

HOLIDAYS/FLOATING HOLIDAYS

All full-time employees (including those in initial employment period) are eligible for 9 paid holidays per year as follows:

- New Year's Day
- Dr. Martin Luther King, Jr. Day
- President's Day
- Memorial Day
- Independence Day
- Labor Day
- Columbus Day
- Thanksgiving
- Christmas

When a holiday falls on a weekend, it will be observed on either the preceding Friday or following Monday. To receive holiday pay an employees must work their assigned shift the day before and the day after the holiday. Holidays are to be observed on their actual dates or as time off are arranged. Due to the special demands of our programs if you are scheduled to work on a holiday, benefit eligible employees will be paid for hours worked and will be given another day off at a mutually agreed upon date within 2 weeks of the original holiday.

The agency offers two floating holidays per calendar year, one to be used in the first six (6) months of the year and the second to be used in the last six (6) months of the year.

BEREAVEMENT LEAVE

In the unfortunate event of a death in the immediate family, a leave of absence of up to 3 days with pay will be granted. These three days are to be taken consecutively within a reasonable time of the day of the death or day of the funeral, and may not be split or postponed.

For this purpose, immediate family is defined as:

- Spouse
- Domestic Partners
- Child
- Step-child, foster child
- Parents (including in-laws), step-parents
- Foster-parents
- Siblings, step-siblings
- Grandparents
- Grandchildren

Employees should make their supervisor aware of their situation. In turn, the supervisor should notify Human Resources of the reason and length of the employee's absence. If additional time is needed, the employee may use accrued earned time or may request an unpaid leave of absence. This additional time must be arranged with their supervisor.

Upon returning to work, the employee must record his/her absence as a Bereavement Leave on his/her attendance record. Proof of death and relationship to the deceased may be required.

JURY DUTY

A leave of absence for jury duty will be granted to any full-time or part-time employee who has been notified to serve. During this leave, employees will be compensated by payment of an amount equal to the difference between their jury duty pay and their regular salary. An employee on jury duty is expected to report to work any day he/she is excused from jury duty.

Upon receipt of the notice to serve jury duty, the employee should immediately notify his/her supervisor, as well as the Human Resources Department. Additionally, a copy of the notice to serve jury duty should be attached to the employee's attendance record for attendance purposes.

Upon the employee's return, the employee must notify Human Resources and must submit a signed Certificate of Jury Service indicating the number of days served.

MILITARY LEAVE

An employee who is a member of the United States Army, Navy, Air Force, Marines, Coast Guard, National Guard, Reserves or Public Health Service will be granted an unpaid leave of absence for military service, training or related obligations in accordance with applicable law. Employees on military leave may substitute their accrued earned time for unpaid leave. At the conclusion of the leave, upon the satisfaction of certain conditions, an employee generally has a right to return to the same position he or she held prior to the leave or to a position with like seniority, status and pay that the employee is qualified to perform.

Continuation of Health Benefits

During a military leave of less than 31 days, an employee is entitled to continued group health plan coverage under the same conditions as if the employee had continued to work. For military leaves of more than 30 days, an employee may elect to continue his/her health coverage for up to 24 months of uniformed service, but may be required to pay all or part of the premium for the continuation coverage. [NOTE: Employees and/or dependents who elect to continue their coverage may not be required to pay more than 102% of the full premium for the coverage elected. The premium is to be calculated in the same manner as that required by COBRA.]

Requests for Leave

- Leave for Active or Reserve Duty

Upon receipt of orders for active or reserve duty, an employee should notify his/her supervisor, as well as Human Resources, as soon as possible, and submit a copy of the military orders to his/her supervisor and the Human Resources Department (unless he/she is unable to do so because of military necessity or it is otherwise impossible or unreasonable).

- Leave for Training and other Related Obligations (e.g., fitness for service examinations)

Employees will also be granted time off for military training (normally 14 days plus travel time) and other related obligations, such as for an examination to determine fitness to perform service. Employees should advise their supervisor and/or department head of their training schedule and/or other related obligations as far in advance as possible. [OPTIONAL: Employees should retain their military pay vouchers. Upon return from training, the employee should submit his/her military pay voucher to the Human Resources Department; the Company will pay an employee's full salary, less base military pay, for the training period.]

Return from Military Leave

- Notice Required

Upon return from military service, an employee must provide notice of or submit an application for reemployment in accordance with the following schedule:

1. An employee who served for less than 31 days or who reported for a fitness examination must provide notice of reemployment at the beginning of the first full regular scheduled work period that starts at least eight hours after the employee has returned from the location of service.
2. An employee who served for more than 30 days but less than 181 days must submit an application for reemployment no later than 14 days after completing his/her period of service, or, if this deadline is impossible or unreasonable through no fault of the employee, then on the next calendar day when submission becomes possible.
3. An employee who served for more than 180 days must submit an application for reemployment no later than 90 days after the completion of the uniformed service.

4. An employee who has been hospitalized or is recovering from an injury or illness incurred or aggravated while serving must report to the Human Resources Department (if the service was less than 31 days), or submit an application for reemployment (if the service was greater than 30 days), at the end of the necessary recovery period (but which may not exceed two years).

- Required Documentation

An employee whose military service was for more than 30 days must provide documentation within two weeks of his/her return (unless such documentation does not yet exist or is not readily available) showing the following: (i) the application for reemployment is timely (i.e. submitted within the required time period); (ii) the period of service has not exceeded five years; and (iii) the employee received an honorable or general discharge.

TIME OFF TO VOTE

Victory Programs encourages employees to exercise their right to vote. If your work schedule and the location of your polling place will make it difficult for you to get to the polls before they close, you are entitled to take up to 2 hours off work, at the beginning of your shift, to cast your ballot. In order to be paid for this time you will need to use accrued earned time.

Employees who will need to take time off work to vote must inform their supervisors at least two days in advance. Employees are expected to work with their supervisors to ensure that their absence doesn't negatively impact program operations. No employee will be penalized or retaliated against for requesting time off to vote.

TIME OFF DUE TO DOMESTIC VIOLENCE

Employees may take up to (15) fifteen days off in a rolling 12-month period for the following reasons:

1. If the employee or a family member of the employee is a victim of “abusive behavior;”
2. The employee is using the time off to seek or obtain medical attention, counseling, victim services or legal assistance, secure housing, obtain a protective order from a court, appear in court or before a grand jury, meet with a district attorney or other law enforcement official, or attend child custody proceedings or address other issues directly related to the abusive behavior against the employee or family member of the employee; and
3. The employee is not the perpetrator of the abusive behavior against such employee’s family member.

“Abusive behavior” is any behavior constituting domestic violence, stalking, sexual assault, or kidnapping as defined by the law.

“Family member” is a spouse, persons in a substantive dating or engagement relationship who live together, persons having a child together, parent, step-parent, child, step-child, sibling, grandparent, grandchild, or persons in a guardian relationship.

Notice of the Need for Time Off

Except in cases of imminent danger to the health and safety of an employee, an employee seeking time off under this policy must provide advance notice of the need for such time off. A 30-day advance notice is required when the need is foreseeable. If the need is not foreseeable because of a lack of knowledge of approximately when leave will be required to begin, a change in circumstances, or an emergency, then the employee must give as much notice as is possible under the particular circumstances involved. When no advance notice is possible, an employee must notify Victory Programs within three workdays that the leave was taken for one of the qualifying reasons set forth above.

Documentation

Victory Programs may require an employee to provide documentation evidencing that the employee or employee's family member has been the victim of abusive behavior. Depending on the circumstances, such documentation may include a protective order, a letter from a public agency or court regarding assistance provided, a police report, conviction information, medical documentation of treatment, a statement by a social worker, health worker, clergy, legal advocate, or other professional providing assistance, a sworn statement from the employee, or other appropriate documentation. Such documentation will be treated as confidential.

Use of Paid Time Off and Other Leave

If the employee has accrued earned time available, s/he may use such time off concurrently with any leave taken under this policy, provided the reason for the leave qualifies for the paid time off benefit. Similarly, if an employee is eligible for Domestic Violence leave under this policy and also qualifies for time off under the Family and Medical Leave Act or other type of leave of absence, such leave time will run concurrently.

ABSENCE DUE TO ILLNESS

To keep the programs running smoothly and efficiently, it is important that every employee be on the job on time regularly. For this reason, careful attention is given to promptness, absence record and overall dependability.

Victory Programs recognizes, however, that an employee may occasionally be disabled by injury or illness. Employees who are unable to perform their jobs due to illness or injury are eligible to use accrued earned time for sick days.

To be eligible for sick pay, employees unable to report to work due to illness must telephone their supervisor directly, as soon as possible, but no later than 3 hours in advance of their scheduled shift. If an employee is unable to make the call personally, a family member or a friend should contact the supervisor. The supervisor must be notified each day of absence. An employee who fails to contact his/her immediate supervisor may be considered as having voluntarily resigned. This policy must be followed unless an exception has been made for a particular absence, and a written memo to this effect has been sent to the Human Resources Department.

If Victory Programs has questions about the nature or length of an employee's disability or ability to return to work, a written certification from a physician or licensed health care professional may be required. Generally, an employee who takes off three or more days consecutively due to illness or injury must provide a doctor's note to substantiate his/her need for time off and his/her ability to return to work.

LEAVE UNDER THE FAMILY AND MEDICAL LEAVE ACT ("FMLA")

In accordance with the Family and Medical Leave Act of 1993 ("FMLA"), Victory Programs will provide eligible employees with a family or medical leave for up to twelve (12) work weeks in any "rolling" 12-month period, measured backward from the date an employee uses any FMLA leave. The leave may be paid, unpaid, or a combination of paid and unpaid, depending on the circumstances as specified in this policy. If an employee is not eligible for a 12-week FMLA leave, an eight (8) week maternity or adoption leave may be granted in accordance with Massachusetts state law, or a medical leave may be granted in appropriate circumstances to an employee as a reasonable accommodation for a disability. In addition, eligible employees may take up to twenty-six (26) weeks of FMLA leave in a single twelve-month period to care for a relative who incurs a serious injury or illness in the course of active military duty as set forth below.

Eligibility

To be eligible for FMLA leave, an employee must be employed by Victory Programs for at least 12 months or 52 weeks (not necessarily consecutive) and have worked at least 1,250 hours during the previous 12 month period. For

employees, who are not eligible for FMLA, Victory Programs will provide maternity and adoption leaves in accordance with Massachusetts law and medical leaves as a reasonable accommodation.

Types of Leave Covered

FMLA leave may be taken for one or more of the following reasons:

- to take a medical leave when the employee is unable to perform the functions of his/her position because of a serious health condition;
- to care for a spouse, child, or parent with a serious health condition;
- for the birth, adoption or foster care placement of a child;
- to care for a covered servicemember with a serious injury or illness if the employee is the spouse, son, daughter, parent, or next of kin of the servicemember; or
- due to a qualifying exigency arising out of the fact that the employee's spouse, son, daughter, or parent is a covered military member on active duty (or has been notified of an impending call or order to active duty) in support of a contingency operation.

Serious Health Condition

A "serious health condition" is an illness, injury, impairment, or physical or mental condition affecting the employee's or family member's health to the extent that inpatient care is required in a hospital, hospice, or residential medical care facility, or a condition that requires continuing treatment by a health care provider. It includes a serious and long-term illness which results in recurrent or lengthy absences for treatment or recovery.

A serious health condition involving "continuing treatment" by a health care provider includes: (1) a period of incapacity of more than three (3) consecutive calendar days and any subsequent treatment or period of incapacity relating to the same condition; (2) any period of incapacity due to pregnancy or prenatal care; (3) any period of incapacity or treatment due to a chronic serious health condition (e.g., diabetes, asthma, epilepsy); and (4) a period of incapacity which is permanent or long-term and for which treatment may not be effective (e.g., Alzheimer's disease).

A serious health condition also includes, although is not limited to, most cancers, strokes, appendicitis, pneumonia, heart attacks, heart conditions requiring bypass or valve operations, back conditions requiring extensive therapy or surgical procedures, severe arthritis, pneumonia, severe nervous disorders, miscarriages, complications or illnesses related to pregnancy, childbirth and recovery from childbirth. Substance abuse may qualify as a serious health condition if certain conditions are met. However, FMLA leave may only be taken for treatment for substance abuse by a health care provider, not for the use of the substance itself or for an employee's self-referral to any treatment program.

The following usually would not be considered serious health conditions: common cold, flu, earaches, upset stomach, minor ulcers, non-migraine headaches, routine dental and orthodontic problems, and periodontal disease. FMLA does not cover voluntary or cosmetic treatments (such as most treatments for orthodontia or acne) which are not medically necessary, unless inpatient hospital care is required.

For any condition which does not require inpatient care, the employee or family member must be receiving continuing treatment by or supervision from a health care provider. Generally, a health condition which, if left untreated, would result in a period of incapacity requiring absence of more than three (3) calendar days from work, school, or other regular daily activities would be considered a serious health condition. However, a regimen of treatment does not include the taking of over-the-counter medications such as aspirin, antihistamines, or salves; or bed-rest, drinking fluids, exercise, and other similar activities that can be initiated without a visit to a health care provider.

Employees with questions about whether a particular situation qualifies as a serious health condition should consult with Human Resources Department.

Leaves Requested Because of Serious Health Condition

To receive FMLA leave because of an employee's own serious health condition or to care for a spouse, child or parent with a serious health condition, employees should give the following notices and/or certifications:

- A 30-day advance notice of the need to take FMLA leave is required when the need is foreseeable. If the need for a leave is not foreseeable because of a lack of knowledge of approximately when leave will be required to begin, a change in circumstances, or a medical emergency, then the employee must give as much notice as is possible under the particular circumstances involved.
- Notice is given when the employee submits a written request for a leave to his/her supervisor, with a copy to Human Resources. If written notice is not possible because the need for the leave was not foreseeable, oral notification should be given immediately to an employee's supervisor and followed up in writing as soon as possible thereafter.
- Satisfactory medical certification must be submitted with the leave request or at least within 15 days of the request for the leave. The certification must support the need for leave due to a serious health condition affecting the employee or the employee's spouse, child or parent, and include the date the serious health condition began, its anticipated duration, diagnosis, and a brief statement of treatment, along with a statement of the employee's intent to return to work.
- Victory Programs may communicate with the employee's health care provider for authentication or clarification of the contents of the medical certification document.
- If the request for leave is for a medical leave because of the employee's own serious health condition, the required medical certification must also include a statement that the employee is unable to perform the essential functions of the employee's position and should note any type of activities the employee can perform.
- If the request for leave is to care for a seriously ill family member, the certification must include a statement that the patient requires assistance and that the employee's presence would be beneficial or desirable.
- Periodic reports may be required during FMLA leave regarding the employee's status, anticipated duration of leave, and intent to return to work. Medical certification is required to cover all periods of absence while on leave.
- Medical documentation will be required certifying the employee's ability to return to work from a leave because of the employee's serious health condition.

When medically necessary, employees may take FMLA leave on an intermittent basis, or by reducing their normal weekly or daily work schedule to care for a sick spouse, child or parent, or because the employee is seriously ill and unable to work. To be eligible for an intermittent or reduced schedule leave, the employee must give thirty (30) days notice, if the leave is foreseeable, and the medical certification must include dates and the duration of treatment and a statement of medical necessity for taking intermittent leave or working a reduced schedule. Further, the employee must discuss with his/her supervisor the scheduling of such leave to minimize disruption to Victory Programs' operations, and Victory Programs may temporarily transfer an employee to an available alternative position with equivalent pay and benefits if the alternative position would better accommodate the intermittent or reduced schedule.

Victory Programs has the right to ask for a second opinion if it has reason to doubt the certification. Victory Programs will pay for the employee to get a certification from a second doctor, which Victory Programs will select. Further, if necessary to resolve a conflict between the original certification and the second opinion, Victory Programs will require the opinion of a third doctor. Victory Programs and the employee will jointly select the third doctor, and Victory Programs will pay for the opinion. The third opinion will be considered final.

Leaves Requested for Birth, Adoption, or Foster Care Placement of a Child

Following successful completion of orientation, Victory Programs provides an unpaid leave of absence for regular employees for the purpose of childbirth or for placement of a child for adoption or foster care. The length of a leave depends on your length of service, as follows:

- After Completion of Orientation: Maximum leave of eight (8) weeks for childbirth or adoption of a child under the age of 18 or 23 years, if physically or mentally disabled.
- After First Year of Employment: For eligible employees, maximum leave of twelve (12) weeks for childbirth, or placement for adoption or foster care for a child under 18 years, or older if incapable of self-care because of a mental or physical disability. This leave must be concluded within 12-months of the birth or placement.

Any leave taken for childbirth or placement of a child for adoption or foster care will be deducted from an eligible employee's maximum of 12 weeks FMLA leave in a 12-month period.

A husband and wife both employed by Victory Programs are entitled to a combined total of 12 work weeks of FMLA leave for the birth or placement of a child for adoption or foster care and to care for a parent (but not a parent-in-law) who has a serious health condition. Each employee may use any remaining leave for other qualifying FMLA purposes.

To receive FMLA leave because of a birth, adoption, or placement of a child in foster care, employees should give the following notices and/or certifications:

- At least two weeks advance notice of the need to take a leave and request therefore is required when the need is foreseeable. However, employees are encouraged to provide the team leader with as much notice as is possible under the particular circumstances involved.
- The notice must include the employee's intention to return to work following the leave, and appropriate documentation from a physician for childbirth, or other appropriate entity for adoption or foster care placement should accompany the notice and request for leave.
- Notice is given when the employee submits a written request for a leave with appropriate documentation to his/her Department Head, with a copy to the Business Office.

While on an approved maternity leave due to childbirth, an employee must use any accrued earned time during the period of the maternity leave when the employee is physically unable to work. Use of vacation or sick pay may not be used to extend the leave period.

A leave for birth or placement for adoption or foster care must conclude within 12 months of the birth or placement. Such a leave must be taken all at once.

Upon return from a maternity/adoption/foster care leave at the conclusion of an eight (8) week or twelve (12) week leave, the employee will be reinstated to his/her previous, or a similar position with the same status, pay and length of service credit, wherever applicable, as of the date of the leave, unless there has been a layoff or other changes in operating conditions affecting employment during the period of such leave.

Leaves Requested to Care for an Injured or Ill Servicemember

Eligible employees may take up to twenty-six (26) weeks of leave in a single 12-month period to care for a current member of the Armed Forces, including the National Guard or Reserves, or a member of the Armed Forces, the National Guard or Reserves who is on the temporary disability retired list, who has a serious injury or illness incurred in the line of duty on active duty for which he or she is undergoing medical treatment, recuperation, or therapy; or otherwise in outpatient status. Leave may also be taken to care for a veteran who is undergoing medical treatment, recuperation, or therapy for a serious injury or illness and who was a member of the Armed Forces at any time during the period of five (5) years preceding the date on which the veteran undergoes that treatment.

A “serious injury or illness” means an injury or illness incurred by a covered servicemember in the line of duty on active duty that may render the servicemember medically unfit to perform the duties of his or her office, grade, rank or rating.

In order to care for a covered servicemember, an eligible employee must be the spouse, child, parent, or next of kin of a covered servicemember.

The “single 12-month period” in which the 26 weeks of leave can be taken begins on the first day the eligible employee takes FMLA leave to care for a covered servicemember and ends 12 months after that date.

Leaves Requested Due to Qualifying Exigencies for Families of Members of the Armed Forces

An eligible employee may take FMLA leave while the employee’s spouse, child, or parent is on covered active duty for certain qualifying exigencies.

“Covered active duty” for a member of the regular Armed Forces means deployment in a foreign country and, for a member of the reserves, deployment to a foreign country under a call to active duty under certain federal laws.

Leave may be taken for one of the following “qualifying exigencies”:

- Short notice deployment: To address any issue that arises from the fact that a covered military member is notified of an impending call or order to active duty in support of a contingency operation seven or less calendar days prior to the date of deployment. Leave taken for this purpose can be used for a period of seven calendar days beginning on the date a covered military member is notified of any impending call or order to active duty in support of a contingency operation.
- Military events and related activities: To attend any official ceremony, program, or event sponsored by the military that is related to the active duty or call to active duty status of a covered military member; and to attend family support or assistance programs and informational briefings sponsored or promoted by the military, military service organizations, or the American Red Cross that are related to the active duty or call to active duty status of a covered military member.
- Childcare and school activities: To arrange for alternative childcare when the call to active duty necessitates a change in the existing childcare arrangement for the covered servicemember’s child; to provide childcare on an urgent, immediate need basis (but not on a routine, regular, or everyday basis) when the need to provide such care arises from the active duty or call to active duty status of a covered military member’s child; to enroll in or transfer to a new school or day care facility for the child of a covered servicemember when enrollment or transfer is necessitated by the active duty or call to active duty status; or to attend meetings with school or day care staff regarding the child of a covered servicemember when such meetings are necessary due to circumstances arising from the active duty or call to active duty status of a covered military member.
- Financial and legal arrangements: To make or update financial or legal arrangements to address the covered military member’s absence while on active duty or call to active duty status, or to act as the covered military member’s representative for purposes of addressing issues involving military service benefits.

- **Counseling:** To attend counseling provided by someone other than a health care provider for oneself, for the covered military member, or for the child of a covered military member when the need for counseling arises from the active duty or call to active duty status.
- **Rest & Recuperation:** To spend up to five days with a covered military member who is on short-term, temporary, rest and recuperation leave during the period of deployment.
- **Post-Deployment Activities:** To attend arrival ceremonies, reintegration briefings and events or other official ceremony or program sponsored by the military within 90 days following the termination of the covered military member's active duty status, or to address issues that arise from the death of a covered military member while on active duty status, such as making funeral arrangements.

Conditions Applicable to FMLA Leaves

An eligible employee can take up to 12 weeks of leave under this policy during any 12 month period. For leaves that do not involve an injured servicemember, Victory Programs will measure the twelve month period as a rolling 12 month period measured backward from the date an employee uses any leave under this policy. For leaves involving an injured servicemember, the employer will measure the single twelve month period beginning on the first day the employee takes the leave and continuing for twelve months thereafter.

Each time the employee takes a leave for one of the reasons covered by the FMLA, Victory Programs will deduct the leave from the 12 (or 26) weeks available. FMLA leave may include absences for which the employee has received paid sick or other leave, or all or part of absences for conditions which progress into serious health conditions to the extent that the leave meets FMLA requirements.

Substitution of Paid Leave

If the employee has accrued paid leave, the employee must use paid leave first and take the remainder of the twelve (12) weeks as unpaid leave.

While on an approved FMLA leave, an employee must use any earned, but unused, paid time off available, provided the reason for the leave qualifies for the paid time off benefit. For example, when the employee is physically unable to work, sick leave must be used, then available vacation or personal time. If the leave is on account of the placement of a child for adoption or foster care, to care for a spouse, child or parent with a serious health condition or the employee has used all of his/her available earned sick time for his/her own serious health condition, the employee must use vacation or any other paid holiday or personal time available. However, use of paid time, including sick, vacation or personal paid time, may not be used to extend the leave period.

Benefit Continuation

As with any other unpaid leave, employees on authorized unpaid FMLA leaves of absence will not accrue any time-off benefits. However, the period of time for which an employee is on leave will not constitute a break in service.

Victory Programs' contribution toward group health insurance will be continued during a FMLA leave. If the employee has paid time available, the employee's required contribution toward group health insurance, if any, will continue to be deducted from the employee's pay. However, in the event that the FMLA leave is unpaid, the employee must make timely payment of his/her required contribution prior to the first day of the month for which coverage is extended, but no later than thirty (30) days following the beginning of the month. If payment is more than thirty (30) days late, the employee's health insurance may be dropped for the duration of the leave. In some instances, if an employee fails to return from a FMLA leave, Victory Programs may recover premiums it paid to maintain health coverage for the employee.

If the employee contributes to a life insurance or disability plan, Victory Programs will continue making payroll deductions while the employee is on paid leave. While the employee is on unpaid leave, the employee must continue to make those payments along with the health care payments. If the employee does not continue these

payments, Victory Programs may discontinue coverage during the leave period, or will recover the payments at the end of the leave period, in a manner consistent with the law.

Restoration to Position

All employees on an FMLA leave will be restored to an equivalent or the same position at the conclusion of an FMLA leave of no greater than twelve (or twenty-six) weeks with the same pay, benefits and other employment terms and conditions. The position will be the same or one which entails substantially equivalent skill, effort, responsibility and authority. However, an employee has no greater right to reinstatement or to other benefits and conditions of employment than if the employee had been continuously employed during the FMLA leave period.

If an employee returns from a leave of longer than eight (8), twelve (12), or twenty-six (26) weeks, his/her position may not be available. However, Victory Programs will make an effort to find a comparable position. Failure to return from a leave of absence on the anticipated date of return will constitute a resignation.

For further information or clarification about FMLA leave, please contact the Director of Human Resources.

SMALL NECESSITIES LEAVE ("SNL")

After twelve (12) months of continuous employment, employees who have worked at least 1,250 hours in the prior year will be eligible to take up to twenty four (24) hours of unpaid leave time during any rolling twelve (12) month period measured backward from the date an employee uses any SNL time.

This time may be used to participate in your child's school activities, to take your child to medical appointments, or to take an elderly relative to medical or care-related appointment. Employees will be paid for SNL if they have accrued earned time available.

Employees should request SNL at least seven (7) days in advance. If the need for such time off is not foreseeable, you should give as much advance notice as possible.

UNPAID LEAVE OF ABSENCE

After completion of the initial employment period of at least six (6) continuous months of employment, an employee may request an unpaid leave of absence for a reason not covered by one of the preceding leave provisions. A written request should be made to your supervisor or the Human Resources Director at least one month before the beginning of the leave and should describe the reasons and the length of the leave requested. The decision to approve the leave will be based upon staffing requirements and on the circumstances of each individual request.

Due to the nature of our business Victory Programs cannot guarantee either that an employee's job will remain available or that a comparable position will exist when return from an unpaid leave is sought. Employees are generally not eligible for agency benefits while on unpaid leave. If your position is not available when are able to return to work you will be eligible to apply for open position that you are qualified for.

Any planned salary increase for an employee returning from an unpaid leave of absence without pay will be deferred by the length of the leave.

EMPLOYEE BENEFITS

DISCLAIMER

Victory Programs has established a variety of employee benefit programs designed to assist you and your eligible dependents in meeting the financial costs that can result from illness and disability, and to help you plan for retirement. This portion of the Employee Handbook contains a very general description of the current benefits offered by Victory Programs. Please understand that this general explanation is not intended to, and does not, provide you with all the details of these benefits. Therefore, this Handbook does not change or otherwise interpret the terms of the official plan documents. Your rights can be determined only by referring to the full text of the official plan documents, which are available for your examination from the Human Resources Department. To the extent that any of the information contained in this Handbook is inconsistent with the official plan documents, the provisions of the official documents will govern in all cases.

As in the past, Victory Programs reserves the right, in its sole and absolute discretion, to amend, modify or terminate, in whole or in part, any or all of the provisions of the benefit plans described herein, including any health benefits that may be extended to retirees and their dependents. Further, Victory Programs reserves the exclusive right, power and authority, in its sole and absolute discretion, to administer, apply and interpret the benefit plans described herein, and to decide all matters arising in connection with the operation or administration of such plans.

For more complete information regarding any of our benefit programs, please contact the Human Resources Department.

HEALTH INSURANCE

Victory Programs currently offers regular full-time and regular part-time employees who have been employed by Victory Programs for 30 days health coverage under a HMO (Health Maintenance Organization).

You have up to 30 days from your employment date to make your medical plan election. Once made, your election is generally fixed for the remainder of the plan year. However, if you undergo a change in family status (as defined in the Plan document), you may make a mid-year change in coverage (i.e., you may change coverage from individual to family or from family to individual, add or delete dependents, or revoke coverage), provided you do so within 60 days from the date of the change in family status. Please contact the Human Resources Department to determine if a family status change qualifies under the Plan document and IRS regulations.

At the end of each calendar year, during open enrollment you are free to change your medical elections for the following calendar year, whether or not you have a change in family status.

The Human Resources Department will assist you in making the necessary arrangements for enrollment.

DENTAL INSURANCE

If you are a regular non-temporary, non-seasonal employee who is regularly scheduled to work at least 20 hours per week, then you are eligible for our Dental Plan after 30 days of employment or during open enrollment.

FLEXIBLE SPENDING ACCOUNT

As part of the Company's Flexible Benefits Plan, we currently offer an employee-funded Flexible Spending Account to regular full-time employees hired on or before January 1 of a calendar year. Just before the beginning of

the calendar year, plan participants may elect an annual amount of flexible dollars (which will be deducted pro rata on a pre-tax basis from each paycheck) to pay for eligible health care expenses. Generally, these are expenses qualifying under IRC Sec. 213 (with some exceptions) incurred during the plan (calendar) year that are not reimbursable from any other source. Eligible health care expenses may include medical or dental insurance deductibles, co-payments, and your out-of-pocket costs for vision care, etc.

According to IRS regulations, if eligible medical or dental expenses that you incur during the calendar year are less than your elected annual amount of flex dollars for that year, you must forfeit the balance. As a result, you should carefully evaluate your potential costs for the next year before designating the amount you will contribute to the plan.

GROUP LIFE INSURANCE

The Company offers regular full-time and part-time employees (who are regularly scheduled to work at least 20 hours per week) who have been employed for 30 days an employer-paid basic group term life policy along with an accidental death and dismemberment policy. Each policy generally pays a death benefit equal to the lesser of their "Life Salary" (as defined in the Plan document) or \$50,000.

SHORT TERM DISABILITY

The Company's short-term disability plan is a benefit that provides partial pay (currently 60% of weekly wages up to a maximum benefit as determined by state law) for employees who are unable to work due to non-work related illness, injury, or disability, after an absence of more than 14 consecutive calendar days. Benefits begin on the 15th day of disability and continue for related absences up to a maximum of 26 weeks. If the employee returns to work and the disability recurs within 90 days, the employee does not have to wait another 14 days for disability benefits.

LONG-TERM DISABILITY

Victory Programs provides eligible employees (i.e., regular full-time and part-time employees who are regularly scheduled to work a minimum of 20 hours per week) a non-contributory Short (STD) and Long-Term Disability (LTD) base plan. Eligible employees are automatically enrolled 3 months as of the first day of the calendar month on or following their date of hire.

401(k) PLAN

Victory Programs makes available to all regular employees an option to participate in voluntary individual tax shelter annuity plan. Human resources will provide specific details of enrollment procedures and benefits.

WORKERS' COMPENSATION BENEFITS

Victory Programs is covered under statutory state Workers' Compensation Laws. Should you sustain a work-related injury, you must immediately notify your supervisor and the Human Resources Department. Should your injury require the attention of a doctor, you can obtain a list of approved physicians by calling our Workers' Compensation Carrier's Physician Network Referral Unit. (The Human Resources Department will give you the Referral Unit's telephone number). In case of an emergency, you should go to the nearest hospital emergency room for treatment and then utilize the Network Referral if additional treatment is necessary.

EMPLOYEE ASSISTANCE PROGRAM ("EAP")

Victory Programs offers a voluntary and professional service that provides information, counseling, and referral services to all full-time and part-time employees and their dependents that may be experiencing personal stress in their lives. Please consult the Human Resources Department for details.

ON THE JOB

ID BADGE POLICY

Protecting the security of our staff, clients, and workplaces is critical. As a vital part of our security system, a Victory Programs identification badge with your photo and program/department will be issued to you on your first day of employment. Everyone is required to wear their ID badge on a lanyard around the neck or on a clip at all times while on agency property or when you attend outside meetings representing Victory Programs.

If your ID badge is lost or stolen, you must obtain a replacement. Lost or stolen badges should be reported to Human Resources, as soon as possible. Failure to wear your ID badge or excessive loss or damage to badges can lead to disciplinary action.

Temporary and consultant staff with assignments of one or more weeks will be issued a photo ID badge.

Upon termination, employees, contractors or temporary staff will be required to return ID badges to Human Resources.

ATTENDANCE, PUNCTUALITY AND DEPENDABILITY

Because Victory Programs depends heavily upon its employees, it is important that employees attend work as scheduled. Dependability, attendance, punctuality, and a commitment to do the job are essential at all times. As such, employees are expected at work on all scheduled work days and during all scheduled work hours and to report to work on time. Moreover, an employee must notify his/her supervisor as far in advance as possible, but not later than three hours before his/her scheduled starting time if he/she expects to be late or absent. This policy applies for each day of his/her absence. An employee who fails to contact his/her immediate supervisor may be considered as having voluntarily resigned. A careful record of absenteeism and lateness is kept by the employee's supervisor and becomes part of the personnel record. To the extent permitted by law, absenteeism and lateness lessen an employee's chances for advancement and may result in disciplinary action up to and including termination.

EXPENSE REIMBURSEMENT POLICY

Employees and members of the Board of Directors may be eligible for reimbursement for travel and entertainment expense incurred in the course of doing business on behalf of the agency. It is intended that this policy provides guidance and limitations on reasonable expenditures.

Below are guidelines for expense reimbursement while traveling on behalf of Victory Programs, Inc. ("VPI") business:

1. Staff travel must be pre-approved or designated within the annual budget.
2. VPI Board members traveling on VPI related business must have approval in advance from the board chair if it is to be reimbursed.

Transportation - When arranging for air travel attempt to book the lowest available fare VPI will reimburse only for economy, coach or economy plus level of airfares. The cost of Business Class and First Class travel is not allowed.

Vehicles may be rented for organizational business in certain circumstances, such as out of town travel and special events. Sub-compact or compact car rental is preferred unless unusual circumstances require a larger vehicle, e.g. transporting several people or a van rental is required to move supplies. Rental cars must be returned with a full tank of gas to avoid extra charges.

The VPI automobile policy covers liability, property damage, and vehicle damage for vehicles rented by employees of VPI, its councils and clubs. The optional insurance features offered by the rental company are not to be purchased.

In the rare instance that anyone other than an employee or volunteer is going to be an authorized driver on the rental agreement, then the optional liability coverage and collision damage coverage should be purchased unless it is determined that these are covered by personal car insurance company or through the credit card used to pay for the rental.

Employees may use ZIP car when it is needed. Supervisor approval and is required for ZIP Car use and sign up with Zip Car is needed well in advance of car use.

Lodging - Room rates in excess of \$175.00 per night require prior authorization

Meals – Reasonable costs for meals will be reimbursed. For business travel this is expected to be in the range of \$40 to \$60 per day as a guideline and tipping is reimbursable.

Local Transportation – Effort should be made to use low cost local transportation when practical. Taxis are an allowed expense but public transportation is preferred. Parking fees are reimbursed when a personal vehicle is used for business travel.

Hosting meals – When hosting a meal or entertainment is needed in the normal course of business with board members, collaborators, donors or volunteers, staff and/or board members may be reimbursed for their expenses.

Entertainment -You may be called upon to entertain a visiting guest. In such cases, all anticipated entertainment expenses must be pre-approved.

Miscellaneous - Reasonable internet connection fees for business needs while traveling are reimbursable. Reasonable porter, bellman, housekeeper, and houseman tips are determined by local practice. Check with the hotel for guidelines if you are not sure. Normally \$1.00 per article for assistance and \$2.00/day for housekeepers are acceptable.

When traveling internationally, currency exchange fees are reimbursable.

Mileage - When using your own vehicle for transportation, VPI will pay mileage at the reimbursement rate of 48.2 cents per mile. This covers all expenses including insurance, maintenance, gas, etc. Mileage reimbursement expenses must be submitted to Accounting within 30 days of travel.

Expense Reports - In general all business expenses (meals, taxis, tolls, parking, car rentals, etc.) submitted for reimbursement must be supported with the original detailed receipt. Submitting a copy of your charge card bill alone, for instance, is not acceptable. This is the only way accounting can be sure a reimbursement has not been paid twice and that it is a legitimate business expenses. If you do not have a receipt, note on your expense report the reason why. Unsupported expenses will be considered for reimbursement on a case-by-case basis.

All expense reports are to be approved by a supervisor or in the case of the board of directors by the Board President. Reports are to be submitted to the accounting department on a timely basis.

MEDICAL DOCUMENTATION

From time to time, employees may be required as a condition of employment to undergo a medical examination or otherwise to provide Victory Programs with requested documentation, such as evidence of the existence or duration of a medically required absence, ability to return to work after an injury or illness, etc. In the event that a physician designated by Victory Programs performs a medical examination at Victory Programs' request, Victory Programs will pay the cost.

DRUG & ALCOHOL ABUSE POLICY

Manufacture, distribution, dispensation, possession, or use of any illegal drug, alcohol, or controlled substance while on Victory Programs premises is strictly prohibited. Employees may not report to work under the influence of alcohol or illegal drugs or even smelling of alcohol. These activities constitute serious violations of Victory Programs rules, jeopardize the agency and can create situations that are unsafe or that substantially interfere with job performance. Employees in violation of the policy are subject to appropriate disciplinary action, up to and including termination.

It is the policy of Victory Programs to maintain an alcohol-free and drug-free workplace. The manufacture, distribution, possession or use of controlled substances or alcohol is prohibited while on duty or on Agency property. Any violations of this policy will be grounds for disciplinary action up to and including immediate employment termination.

It is a condition of employment that each employee abides by this policy and notifies Victory Programs of any violations occurring in the workplace within five (5) days of such violation. Victory Programs has an obligation to notify the appropriate federal agency within ten (10) days of receiving such a notice of conviction. Further, no later than thirty (30) days after notice of a conviction, Victory Programs will take appropriate action up to and including termination of employment or require the employee to complete a drug and alcohol abuse assistance or rehabilitation program approved by a federal, state, local, health, law enforcement, or other appropriate agency.

For safety reasons, an employee on prescribed medications that could affect the employee's job performance should inform the Human Resources Director in writing of medical and medications needs.

DRESS POLICY

While Victory Programs does not wish to limit your expression of taste and individuality, what we wear to work is a reflection of our own professionalism and that of the agency. We ask that you dress appropriately for your position. In addition, certain requirements must be observed. Clothing that work well for the beach, dance clubs, and exercise sessions are not appropriate for a professional appearance at work. Clothing that reveals too much of your back, your chest, or your stomach, is low cut, revealing or extremely tight fitting is not appropriate for the workplace. Casual dress such as halter dresses/tops, tank tops, T-shirts with inappropriate pictures or language (e.g., sexually explicit or four letter words) that show discrimination towards ethnic or religious groups, short-shorts and sweat suits are not appropriate dress for work.

You are not allowed to wear jeans during the week except on casual Fridays or if you work in a program that is authorized to wear jeans during the week due to the kind of work they perform (i.e. farm work at Revision House). Also jeans are not allowed if you are representing the agency at meetings/trainings or participating in New Employee Orientation.

Loafers, boots, flats, dress heels, leather deck shoes, and conservative athletic shoes are acceptable. Flip-flops and slippers are not acceptable.

If clothing fails to meet the standards of this policy, as determined by the employee's supervisor they will be required to take corrective action, which may include being asked to go home and change his or her attire. Non-exempt employees will not be compensated for any work time missed because of failure to comply with this policy.

Please contact Human Resources if you need further clarification regarding this policy.

STANDARDS OF CONDUCT

Victory Programs requires order and discipline to succeed and to promote efficiency, productivity and cooperation among its employees. The orderly and efficient operations of Victory Programs require that employees maintain proper standards of conduct at all times. That includes courtesy, respect, and working collaboratively and

cooperatively, exercising good judgment, and demonstrating the characteristics of high performing team members. Because of the nature of our work, Victory Programs seeks to provide the highest quality of service to our clients. Thus, poor work habits, such as careless work, failure to complete assignments on time, or a failure to follow instructions, are unacceptable.

Conduct that does not meet Victory Programs standards, such as violations of Victory Programs policies, a lack of respect or courtesy to a fellow employee or client, disruptive or disorderly conduct, etc., will not be tolerated and will be grounds for immediate disciplinary action and may result in termination of employment. In addition, any breach of trust or conduct which shows a serious lack of dependability or good judgment, such as theft, falsification of Victory Programs records, destruction of property, conflict of interest, insubordination, etc., may be grounds for immediate discipline up to and including termination.

All instances of misconduct should be referred to the Human Resources Department immediately.

ANTI-NEPOTISM POLICY

Members of an employee's immediate family will be considered for employment on the basis of their qualifications. Immediate family may not be hired, however, if employment would:

- (i) Create a supervisor/subordinate relationship with a family member;
- (ii) Have the potential for creating an adverse impact on work performance; or
- (iii) Create either an actual conflict of interest or the appearance of a conflict of interest.

This policy must also be considered when assigning, transferring, or promoting an employee. For the purpose of this policy, immediate family includes: spouse, parent, child, sibling, in-law, aunt, uncle, niece, grandparent, grandchild, members of household. This policy also applies to romantic relationships.

Employees who become immediate family members or establish a romantic relationship may continue employment as long as it does not involve any of the above. If one of the conditions outlined should occur, attempts will be made to find a suitable position within Victory Programs to which one of the employees will transfer. If employees become immediate family members or establish a romantic relationship, the agency will make reasonable efforts to assign job duties so as to minimize problems of supervision, safety, security or morale. If accommodations of this nature are not feasible, the employees will be permitted to determine which of them will resign. If the employees cannot make a decision, Victory Programs will decide in its sole discretion who will remain employed.

CONFLICT OF INTEREST POLICY

Related party transactions with Victory Programs, Inc. are permitted provided that related party's interest shall be disclosed or shall be known to the Board of Directors or a majority of the directors thereof, and provided further that such person shall neither vote nor be counted in determining the existence of a quorum for voting on such matter.

Although related party transactions are permitted, VPI must avoid engaging in any transactions in which any director, staff members or other related parties have material conflicting interest with the organization resulting from any relationship or business affiliation and VPI must work towards transparency and full disclosure of all related party transactions.

In determining the appropriateness of a related party transaction, the board must make its decisions in good faith and in a manner that it believes to be in the best interests of the organization and in furtherance of the mission and public purposes that the organization seeks to serve.

Persons Covered: This statement is directed not only to directors and officers, but to all employees or individuals who either have access to confidential information that could place them within a conflict situation or could give the

appearance that they have the ability to unduly influence the actions of Victory Programs. For example, this would include all who make purchasing decisions, management personnel, directors, or major donors.

Areas in which conflict may arise: A conflict exists when a covered person (as defined above) proposes to act on any issue, matter, or transaction in which Victory Programs has an interest and the covered person may have an interest separate from Victory Programs. A conflict of interest also exists in situations in which there is an appearance that a covered person is utilizing inside information that is proprietary to Victory Programs for his or her benefit, is acting in his or her own interest rather than the best interest of Victory Programs, has the ability to exercise undue influence over Victory Programs decisions, or is receiving favorable treatment by Victory Programs because of his or her status as a covered person.

Conflicts of interest may arise in the relations of directors, officers, and management employees with any of the following third parties:

- Persons and firms supplying goods and services to VPI
- Persons and firms from whom VPI leases property and equipment
- Persons and firms with whom VPI is dealing or planning to deal in connection with the gift, purchase or sale of real estate, securities, or other property
- Competing or affinity organizations
- Donors and others supporting VPI
- Agencies, organizations, and associations that affect the operations of VPI
- Family members, friends, and other employees

Nature of conflicting interest: A material conflicting interest may be defined as an interest, direct or indirect, with any person and firms doing business with Victory Programs or an improper financial relationship with Victory Programs. Such an interest might arise through:

- Owning stock or holding debt or other property interests in any third party dealing with Victory Programs
- Holding office, serving on the board, participating in management, or being otherwise employed (or formerly employed) in any third party dealing with Victory Programs
- Receiving remuneration for services with respect of individual transactions involving Victory Programs
- Using Victory Programs' time, personnel, equipment, supplies, or good will for other than Victory Programs approved activities, programs, and purposes
- Receiving personal gifts or loans from third parties dealing with Victory Programs. Receipt of any gift is disapproved except gifts of nominal value that could not be refused without discourtesy. No personal gift of money should ever be accepted.
- Receiving gifts, funds or loans from Victory Programs for personal use and such gifts, funds or loans are delivered by means other than through normal mechanism for compensation and expense reimbursement.

Interpretation of this statement of policy: The areas of conflicting interest listed above and the relations in those areas that may give rise to conflict are not exhaustive. Conceivably, conflicts might arise in other areas or through other relations. It is assumed that the trustees, officers, and management employees will recognize such areas and relation by analogy.

The fact that one of the interests described above exists does not mean necessarily that a conflict exists, or that the conflict, if it exists, is material enough to be of practical importance, or if material that upon full disclosure of all relevant facts and circumstances that it is necessarily adverse to the interest of Victory Programs.

However, it is the policy of the board that the existence of any of the interests described above shall be disclosed before any transaction is consummated. It shall be the continuing responsibility of boards, officers, and management employees to scrutinize their transactions and outside business interest and relationships for potential conflicts and to immediately make such disclosures.

Disclosure Policy and Procedure: Transactions with related parties may be undertaken only if all of the following are observed:

- The related party is excluded from the discussion and approval of such transaction and if the related party is a director then he or she will have no vote on the issue and his or her presence shall not count towards the existence of a quorum
- A competitive bid or comparable valuation exists
- The organization's board has acted upon and are satisfied that the transaction is in the best interest of the organization; and
- Material transactions are disclosed in the audited financial statements of the organization.

Disclosure in the organization should be made to the chief executive (or if she or he is the one with the conflict, then to the board president), who shall determine whether a conflict exists and is material, and if the matters are material, bring them to the attention of the board president.

Disclosure involving director should be made to the board president (or if the president has the potential conflict, then the vice-president), who shall bring these matters, if material, to the board. The board shall determine whether a conflict exists and is material, and in the presence of an existing material conflict, whether the contemplated transaction may be authorized as just, fair, and reasonable to Victory Programs. The decision of the board on these matters will rest in their sole discretion, and their concern must be the welfare of Victory Programs and the advancement of its mission and purpose.

Board Membership: Employees of Victory Programs, its subsidiary units, or licensees may not serve on the governing board of VPI, or any other subsidiary unit, except that employees of the charitable organization may serve on the governing Board of any subsidiary in connection with, and as a consequence of, his or her employment.

INTERN POLICY

Victory Programs accepts applications for internships from a variety of educational institutions with which Victory Programs maintains effective working relationships.

Internship candidates are screened and may be interviewed, when indicated, by program staff. Interns are expected to abide by Victory Programs policies and procedures. Prior to the start of the internship they will need to provide an acceptable CORI and evidence of negative TB test. For a variety of reasons current Victory Programs employees are not typically eligible to be interns in any of our programs, but they may apply. The decision for approval will be made on a case by case basis.

RECOGNITION AND SOCIAL FUNCTIONS POLICY

Periodically Victory Programs will hold social events for the entire staff during which an employee is celebrating a special event such as weddings, birth of a child, adoption or placement of a foster child. On these occasions the Program (Director) in which the employee works will be responsible for organizing an acknowledgment of the event. The entire program staff must be included if Victory Programs is financially supporting the event in any capacity.

The agency will provide an all-inclusive agency luncheon or catered event for an employee who has worked for the company seven (7) or more years and is retiring or leaving employment. The type of function will be dependent on how many staff RSVP, as there is a dollar amount limit. All other recognitions will be the responsibility of the program or department the employee worked in with the approval of their division director.

Individuals may choose to contribute to an independent gift fund (which is organized by the program (Director) or the department (Supervisor)). Contributions to a gift fund are voluntary.

In the event of a death of an employee or an immediate member of an employee's family Victory Programs will either send flowers to the funeral and /or a sympathy card. Supervisors are responsible for alerting Human Resources. Human Resources will send an agency wide announcement if appropriate.

EMPLOYEE LICENSURE/ACCREDITATION, CERTIFICATION AND DRIVERS LICENSE POLICY

When it is a job qualification of your position, employees must provide Victory Programs with proof of current professional licenses, accreditation, and certifications.

Employees whose essential job responsibilities include driving must also provide a current Massachusetts driver's license and a safe driving record with a point rating 3 or below. It is the employee's responsibility to keep his/her license, accreditation, certification, and/or drivers license current and to provide his or her Program Director with an original current document or notarized copy of the documentation to be placed in their personnel file.

Employees, who are licensed, have accreditations or certifications will have their documents verified from time to time or at least annually through the Massachusetts Division of Professional Licensure (MDPL) by the Human Resources Director to verify that the information we have on file is the most current. If the information we verify differs substantially from information provided by the employee they will be notified by Human Resources and given an opportunity to explain the difference or 30 days to have their information updated.

Employees who drive for the agency will be asked annually to submit a safe driving record. If at any time an employee fails to provide the necessary documentation they may be terminated. Also, the Program Director and Human Resources Director must be notified if an employee's license, etc. is suspended or revoked for any reason.

The maintenance of current licenses, accreditation, certifications, and/or driver's license are centralized and maintained in the employee's personnel file in the Human Resources office. Employees are able to review their personnel files with written request to do so.

TELECOMMUTING POLICY

Victory Programs is committed to creating a work environment where the needs of our clients, employees, and the Agency are balanced. Therefore, Victory Programs tries to be flexible in its approach to work styles and location. Telecommuting arrangements may be made on an "as needed basis". Employees are encouraged to spend time working in the office whenever possible. This allows employees to be accessible to customers and creates a sense of consistency and collaboration among work teams. When employees desire to work at home, Victory Programs, asks that they do so in a manner which is in keeping with a work style of accessibility, communication, and productivity. All telecommuting arrangements are subject to approval by the employee's supervisor. In general, the following principles should be used in telecommuting:

- Employees should make arrangements with their manager at least one week in advance of telecommuting.
- Employees should check in with the office regularly.
- Employees should inform their manager of their whereabouts so they may be reached easily.
- Working at home means working, not taking time off.
- Employees should not routinely work at home on days prior to or following vacations or holidays if at all avoidable.

Under regular circumstances, telecommuting should not comprise more than one day in a given week, or more than 3 days a month.

SUPERVISION POLICY

Each staff person should have at least one hour of individual supervision each week. The content of supervision is determined jointly by the supervisor and the staff person, who comes prepared to supervision with a written supervision agenda. Supervision addresses issues of client care, job performance and skill development. Supervisors will also monitor job performance via record reviews, observation, monitoring of caseload and

feedback from clients. Supervisors will typically document each supervision session and maintain these notes in a secure place to ensure confidentiality.

STAFF TRAINING POLICY

Victory Programs believes in developing and improving its personnel. To this end Victory Programs offers in-service training programs in addition to other educational programs, in which it hopes employees will participate. The agency may from time to time require workshops or trainings for its employees. Full-time employees are expected to attend 6 trainings per year, part-time employees are expected to attend 4 trainings per year and Relief/Per Diem are expected to attend 2 trainings per year.

EVALUATION SCHEDULE POLICY

Employees will receive constructive work reviews on the following schedule:

FULL-TIME EMPLOYEES:

- a. 6 month work review after initial hire
- b. annual work evaluation at July 1 of each year

PART-TIME EMPLOYEES (including relief and per diem):

- a. 2 month work review after initial hire
- b. annual work evaluation at July 1 of each year

Under usual and appropriate circumstances, employees should receive a performance review annually. If an employee's job responsibilities change substantially at any time after the annual work review, however, another may be performed before the next annual review, after the new assignment has begun.

OPEN DOOR POLICY

Victory Programs promotes an atmosphere whereby employees can talk freely with members of the management staff. Employees are encouraged to openly discuss with their supervisor any problems so appropriate action may be taken. If the supervisor cannot be of assistance, Human Resources Department is available for consultation and guidance. Victory Programs is interested in all of our employees' success and happiness with us. We, therefore, welcome the opportunity to help employees whenever feasible.

USE OF VICTORY PROGRAMS' NAME

It is the policy of Victory Programs that no employee, volunteer, intern, or contracted individual with Victory Programs represent themselves as a spokesperson for Victory Programs without the prior approval of the Executive Director. This includes use of Victory Programs name and use of agency stationery to make personal endorsements or public service product or cause.

Additionally, no press releases or statements are to be issued without the prior knowledge and review of the Executive Director. Press and media calls are handled exclusively by the Executive Director or person designated by the Executive Director. Violation of this policy may be subject to disciplinary action or termination.

DIFFICULTIES ON THE JOB

In every organization, there are situations where an employee's performance does not measure up to the standards of the job established by the employer, or where s/he does not conform to work or conduct expectations. In such cases, Victory Programs will strive to help employees succeed in their work. However, continued employment depends on Victory Programs' needs and the employee's ability to satisfy performance and conduct standards.

We hope problems will be resolved at an early stage with open communication between the employee and the supervisor. When improvements are necessary in the conduct or performance of an employee, Victory Programs will attempt to give the employee advance notice of the problem and that his or her job is in jeopardy if satisfactory improvement is not made. However, because of the circumstances or the nature and seriousness of the conduct or performance deficiencies involved, Victory Programs may immediately terminate an employee's employment.

INTERNAL COMPLAINT PROCEDURES

To foster sound employee-employer relations through communication and reconciliation of work-related problems, Victory Programs provides employees with an established procedure for expressing employment related concerns.

In situations where employees feel a complaint is in order, the following steps should be taken:

If an employee believes that he/she has a legitimate work-related complaint, the employee is encouraged to first attempt to resolve the issue(s) through discussions with his/her immediate supervisor.

If the situation is not resolved within five working days from the time the complaint is discussed with the employee's immediate supervisor, barring extenuating circumstances, it should be brought to the attention of the next level supervisor or the Human Resources Director with written documentation. Victory Programs will attempt to resolve the complaint within a reasonable period of time while preserving the confidentiality and privacy of those involved to the extent feasible.

An employee who is dissatisfied with the decision of the Human Resources Director may promptly submit a written statement of appeal within one week after the decision to the Executive Director. The decision of the Executive Director at this step shall be final.

SOLICITATIONS, DISTRIBUTIONS, AND USE OF BULLETIN BOARDS

Employees may not solicit any other employee during working time, nor may employees distribute literature in work areas at any time. Under no circumstances may an employee disturb the work of others to solicit or distribute literature to them during their working time.

Persons not employed by Victory Programs may not solicit Victory Programs employees for any purposes on agency premises.

Bulletin Boards

Bulletin boards maintained by Victory Programs are to be used only for posting or distributing material of the following nature:

- notices containing matters directly concerning agency business;
- announcements of a business nature which are equally applicable and of interest to employees.

All posted material must have authorization from Human Resources. All employees are expected to check these bulletin boards periodically for new and/or updated information and to follow the rules set forth in all posted notices. Employees are not to remove material from the bulletin boards.

COMPUTERS, COMMUNICATION SYSTEMS, AND NETWORKS

Victory Programs provides computers, communication systems, voice mail, and networks (including access to the Internet) to its employees to enhance communication and operations. Employees must remember that computers, telephone systems, voice mail and networks including E-mail, bulletin boards, access to the Internet and other systems which enhance communication are Victory Programs' assets provided to employees to assist them in performing their job duties. This equipment and the information and work product they contain are Victory Programs property. Victory Programs computers, telephone systems, voice mail, and networks (including access to the Internet) are for Victory Programs business, not for more than incidental personal use, and should not be misused. Examples of misuse include, but are not limited to jokes or materials derogatory to any protected class, developing chain letters, making defamatory statements, inappropriate disclosure of Victory Programs confidential information (about customers, employees, or otherwise), unauthorized access or permitting unauthorized access. Further, employees should not use the internet or write emails for personal purposes on their work time.

To ensure compliance with this policy, the use of computer and telephone systems and networks are subject to monitoring and review on a periodic basis and as otherwise deemed appropriate by Victory Programs. At any time and without prior notice, Victory Programs may examine E-mail, files, web browser cache files, web browser bookmarks, and other information stored on or passing through Victory Programs computers. Victory Programs may also log web sites visited, files downloaded, time spent on the Internet, and related information.

Work related business is to be conducted through Victory Programs' E-mail system, not through personal email accounts such as those provided by Google, Yahoo, AOL, etc. Employees should be aware that use of such personal E-mail accounts through Victory Programs' computers or networks is subject to the same monitoring and review as all other computer and Internet use as set forth in this policy.

In addition, to maintain an efficient and virus free network environment, Victory Programs needs to control all functions of the network and individual computer workstations. Any disk which has come into contact with any computer outside Victory Programs or was produced by someone other than Victory Programs must be virus checked before being placed or used on any Victory Programs computer. Programs not owned and licensed by Victory Programs should not be placed on any hard drive or network system.

Software and hardware purchased by Victory Programs is for use in conducting activities of Victory Programs only and is not to leave the premises without prior written authorization of the department supervisor.

Individuals wishing to post general announcements through E-mail, bulletin boards, or on a network, must receive prior approval from their supervisor. In addition, individuals should report all potential misuse of computers, systems or networks to their supervisor.

SOCIAL NETWORKING ON THE INTERNET

All employees who use Social Networking such as Facebook, Twitter, etc or blogging must comply with both the agency Computer, Communication Systems and Networks Policy and the Use of Agency Name Policy. The use of Social Networking during regular work hours for any purpose is forbidden unless otherwise approved by the Executive Team.

Approved - Work related Social Networking

The use of Social Networking in the course of agency work or for promotional purposes must have prior approval the Executive Team. All posting and communications through an agency approved Social Networking site must be reviewed and approved by the Director of Community Affairs prior to posting.

Personal use of Social Networking

Employees utilizing Social Networking sites for personal purposes and on their own personal time must comply with the Use of Agency Name Policy. The use of Victory Programs' name or the names of any agency employees,

clients, or others in relations to the agency is strictly forbidden. Employees cannot post on personal blogs and social networking sites photographs of employees, clients, or others. Discussion of the agency or agency related issues or internal affairs in any communications and posting to personal social networking sites is strictly forbidden. Victory Programs will respond and investigate all report of violations of this policy and other related policies. Any violation of this policy will result in disciplinary action up to and including immediate termination.

EMPLOYER INFORMATION AND PROPERTY

The protection of Victory Programs business information, property and all other agency assets are vital to the interests and success of Victory Program. No Victory Programs related information or property, including without limitation, documents, files, records, computer files, equipment, office supplies or similar materials (except in the ordinary course of performing duties on behalf of Victory Programs) may, therefore, be removed from the agency's premises. In addition, when an employee leaves Victory Programs, the employee must return all Victory Programs related information and property that the employee has in his/her possession, including without limitation, documents, files, records, manuals, information stored on a personal computer or on a computer disc, supplies, and equipment or office supplies.

TELEPHONE USE PRACTICES

Because a large percentage of our business is conducted over the phone, it is essential to project a professional telephone manner at all times.

Although Victory Programs realizes that there are times when an employee may need to use the telephone for personal reasons, it is expected that good judgment will be used in limiting the length and frequency of such calls. Additionally, no long distance personal calls may be made on Victory Programs' phones without prior approval from the employee's supervisor.

CELL PHONE POLICY

Use of cell phone for personal calls or texting at work takes time away from your job responsibilities and can be disruptive to others in the workplace. As in the case with any type of personal call, such calls on your cell phone should be kept to a minimum during working time.

Employees should make personal calls or send texts only while they are on lunch break. Employees must place cell phones on either vibrate or silent while in the workplace. When use of a personal call is absolutely necessary, an employee must be aware of his/her surroundings, including others present, and keep his/her voice low enough to prevent distracting or disturbing those around him/her.

Employees whose job responsibilities include regular or occasional driving and who are issued a cell phone for business use are expected to refrain from using their phone while driving. Safety must come before all other concerns. Regardless of the circumstances, including slow or stopped traffic, employees are required to pull off to the side of the road and safely stop the vehicle before placing or accepting a call.

As with any policy, management staff is expected to serve as role models for proper compliance with the provisions of this policy and are encouraged to regularly remind employee of their responsibilities in complying with this policy.

Cell Phone Access

Victory Programs will provide a cell phone to every employee whose position requires him/her to be on call or who is required to do in-home visits.

Cell Phone Hardware

Victory Programs has a group plan with a cellular carrier to provide consistent quality service at a low cost. The agency will provide employees with the most affordable cell phone model offered by the carrier that also fulfills the functionality of the position. The actual model and type of phone provided will be the decision of VPI senior management. All cell phone hardware remains the property of the agency and must be returned by the employee upon request.

Victory Programs will replace a VPI provided work phone every two years if the employee elects to replace his/her phone. If a VPI provided work cell phone is accidentally broken or lost by an employee, Victory Programs will replace the phone with the most affordable model offered by the carrier that also fulfills the functionality of the position. If a VPI provided work cell phone is accidentally broken or lost by an employee more than once in a 12 month period, the employee will be responsible for repaying the agency for the cost of providing a replacement phone.

Reimbursement for Personal Cell Phone

If an employee is eligible for an agency provided phone but would prefer to use his/her own personal cell phone, the agency will reimburse the employee monthly based on the equivalent cost of providing a VPI-owned phone. For 2015-16, depending on what phone carrier is necessary for the position, this amount will be either \$20.00/mo or \$30.00/mo.

Once per year, the Finance Department will calculate the average cost of an agency provided cell phone on the VPI company plan. This cost will be paid to eligible employees who submit a check request form with their personal cell phone bill. For 2015-16, this amount will be \$20.00/mo or \$30.00/mo.

If an employee feels that the reimbursement is not sufficient, he or she may apply to receive an agency provided phone.

Google Voice

Employees have the option of receiving a Google Voice phone number, which will anonymously forward calls to their personal device. If approved, the agency will provide the Google Voice number and also pay the employee for the personal use of his/her cell phone. Google Voice numbers are generally required for client-facing employees. For 2015-2016, this reimbursement amount will be \$20.00/mo.

Cell Phone Plan

Victory Programs will provide each employee with a plan that provides the appropriate level of talk, text and data usage required for their position. Employees agree that the telephone number assigned to an agency owned telephone is the property of Victory Programs and is provided for business use only. Data plans will only be assigned to employees with a demonstrated need for data functions as part of their job.

Agency phone activity is monitored and any unusual activity or usage which exceeds monthly plan limits will be reviewed with employee/s. Employees with consistent personal use of an agency phone which results in added cost to the agency may be requested to reimburse Victory Programs.

Questions regarding this policy should be addressed to the COO or CFO.

INTERNAL INVESTIGATIONS AND SEARCHES

From time to time, Victory Programs may conduct internal investigations pertaining to security, auditing or work-related matters. Employees are required to cooperate fully and assist in these investigations if requested to do so.

Whenever necessary, at Victory Programs' discretion, work areas (i.e., desks, file cabinets, etc.) and personal belongings (i.e., brief cases, handbags, etc.) may be subject to a search without notice. Employees are required to cooperate.

Victory Programs will generally try to obtain an employee's consent before conducting a search of work areas or personal belongings, but may not always be able to do so.

REFERENCE CHECKS POLICY

All inquiries regarding current or former Victory Programs employees must be referred to the Director of Human Resources.

Should an employee receive a written request for a reference, he/she should refer the request to the Human Resources Department for handling. No Victory Programs employee may issue a reference letter to any current or former employee without the permission of the Director of Human Resources.

Under no circumstances should any Victory Programs employee release any information about any current or former Victory Programs employee over the telephone. All telephone inquiries regarding any current or former employee of Victory Program must be referred to the Director of Human Resources.

All employees are asked to sign a Reference Release when they become a Victory Programs employee.

SMOKING POLICY

It is the policy of Victory Programs to maintain a smoke free work place in all of our sites. Tobacco smoking of any kind is prohibited on the premises and property of Victory Programs by any employee, client, or visitor.

Any violations of this policy will be grounds for disciplinary action. Victory Programs offers smoking cessation through our EAP agency and In-Service trainings.

Any questions regarding the smoking policy should be directed to the Human Resources Department.

WORKPLACE VIOLENCE PREVENTION AND CRISIS RESPONSE PLAN

It is the policy of Victory Programs Inc. that all staff at any location will function in an atmosphere free of violence from other staff, clients, members, the general public, and family members. Victory Programs, Inc. will not tolerate workplace violence in any program, on any property, or in any vehicle in which Victory Programs, Inc. business is conducted. In compliance with Executive Order No. 442, this policy is intended to prevent and eliminate workplace violence at Victory Programs, Inc. All reports of workplace violence will be taken seriously and investigated.

Procedure

A. Definitions

The following definitions shall have the meanings assigned to them in this policy for purposes of interpreting this policy.

Human Services Workers: any Victory Programs, Inc. employee, volunteer, intern, individually contracted employee, support contract worker, and provider staff in any Victory Programs, Inc. work place.

Programs: any entity operated, licensed, certified, or funded by department, commission, office board, division, institution or other entity with EOHHS under M.G.L. c 6A, 16 that provides direct services to clients.

Workplace: includes any location where Victory Programs, Inc. business is conducted, or site where the human service worker is considered “on duty,” including public or private programs, property, or vehicles.

Workplace Violence: includes, but is not limited to, physical assault or battery, or both; property damage; and intimidation or threats communicated by any means or other disruptive or aggressive behavior that causes a reasonable person to be in fear of his or her own safety or that of a colleague. Workplace violence can include actions or communications in person, by letter or note, gestures, photographs, by telephone, by fax, by electronic mail, through social media or any other show of force. Any direct or indirect threat of physical harm, violence, harassment, aggression, intimidation, bullying, stalking, or any other behavior that causes a reasonable person to be in fear or causes disruption in workplace productivity. Incidents of workplace violence may take place between human services workers, between human services workers and clients or customers, human services workers and acquaintances, partners or spouses and human services workers and the general public.

B. Workplace Violence is Prohibited

- Workplace violence while Victory Programs, Inc., business is being conducted is prohibited and will be subject to discipline.
- Any use of Victory Programs, Inc. resources to engage in workplace violence is prohibited and will be subject to discipline. A non-exhaustive list of examples of resources are work hours or break times, computers, fax machines, scanners, vehicles, interoffice mail, telephones, pagers, beepers, or any other property, supplies, or equipment.

C. Requirement for Reporting and Filing Incidents Reports

For all “incidents” occurring at any program locations, the Incident Report Form must be completed (typed) and submitted via email to the Director of Programs.

Generally, incident reports should be submitted within 24 hours of the incident occurring.

Types of Incidents requiring reporting:

- Physical or Sexual Assault by or on a client (including suspected child/elder abuse or neglect)
- Serious harm to others
- Medical Emergencies including issues with medications
- Psychiatric Emergencies
- Death of a client while still in services with Victory Programs
- Full or partial evacuation or closure of the program for any reason
- Fire
- Suicide
- Serious criminal acts including threats
- Any other program condition, serious incident or accident that involves the health or safety of clients.
- Confirmed case of communicable disease

Telephone reports should also be made to the direct supervisor, as required in certain circumstances, who will in turn contact:

- Division Director (if applicable) and or the Director of Programs, collateral contacts, i.e. guardian, emergency contact, family, other providers, PCP (as appropriate)

The reports will be reviewed by the Director of Programs, who will forward it to the following individuals and/or entities, if applicable:

- Vice President and COO
- CEO and President
- Director of Human Resources

- Department of Public Health, Department of Housing and Community Development, other payer of services, insurance company, managed care organization, etc.

The Director of Programs will also conduct an internal investigation if need be following the guidelines for internal investigations.

D. Response to Individual Instances of Workplace Violence

1. Victory Programs, Inc. is committed to providing support to victims of and witnesses to workplace violence.
2. Any staff member alleged to have committed workplace violence may be placed on administrative leave or temporarily reassigned pending an investigation of the matter. The letter notifying the staff member of these actions will include a provision that the staff member shall have no contact with the victim and, at times, witnesses. Violations of the no contact provision will be subject to discipline, up to and including termination.
3. Director of Programs, Vice President/COO and President/CEO in conjunction with the General Counsel's office if necessary, shall work with the victims of workplace violence to address any personnel and legal issues, and develop a Safety Plan.
4. Victory Programs, Inc. staff may utilize the agency's Employee Assistance Program (EAP) for counseling and other services. EAP is free and confidential.
5. All other requests for victim or witness support shall be addressed to the Director of Programs, Vice President/COO and Director of Human Resources.
6. The Director of Programs or designee will take steps to address the needs of any client witness.

E. Investigation

An internal investigation following specific procedures will be executed when the following situations (or similar situations) are reported:

- safety concerns
- unhealthy conditions
- staff/resident fraternization
- theft by program staff
- violation of agency/program policies
- reports workplace violence
- violation of governing regulations.

When an incident has been reported by a client, staff or other customer of Victory Programs, the following internal investigation procedure is to be followed:

1. The situation will be investigated by the Program Director with support from the corresponding Division Director. The Director of Human Resources and the Director of Programs will participate in the fact gathering as appropriate.
2. The results of the investigation will be communicated to the Director of Programs and or Director of Human Resources who will create and maintain a file containing pertinent information, including but not limited to written statements, notes related to interviews, photos and other documents related to the investigation.

3. On occasion that the Director of Human Resources or the Director of Programs is the first contact for the complaint, the Director will coordinate with the Program Director or Division Director to gather facts pertinent to the situation.
4. The Director of Programs and or the Director of Human Resources will consider the information, consult with other parties as appropriate and make a decision and determination of the response to the situation.
5. The decision/response will be presented to the agency Vice President/COO for review, consultation and approval.
6. The Vice President/COO is responsible for informing the agency President and Executive Team of the ongoing investigation and for communicating the outcome.
7. The Director of Programs is responsible for informing licensing bodies as necessary.
8. Based on the findings of the investigation, the Director of Programs and or Director of Human Resources in conjunction with the Program Director and Division Directors will update policies and procedures as necessary, ensure compliance in the specific program as well as across the agency as a whole.

F. Retaliation

1. Victory Programs, Inc. will not tolerate retaliation by any staff toward another staff or client.
2. Retaliation will result in disciplinary action, up to and including termination.

G. Training

1. Victory Programs, Inc. will provide safety training for its staff members within the first three months of employment and all employees will participate in workplace violence awareness and prevention, including this policy at least once every two years.
2. Existing staff by February 2017.
3. Staff whose primary work function includes spending time in a program site will participate annually in an on-site safety refresher provided by their corresponding Program Director and Division Director.

H. Prevention Strategies

1. Safety Committee meeting will be held on a bi-monthly basis. The committee members will be co-lead by the Director of Facilities and Director of Human Resources. The committee members will comprised of the Director of Programs, Division Directors, Program Directors and one direct staff member from each program.
2. Safety Committee will review and analyze incident reports that involve workplace violence to and or from staff on a yearly basis.
3. Safety Committee will also determine areas of potential safety risks and ensure that additional attention and or training is provided to those areas.
4. Periodic review of the program worksites will be done for recommendations on improving employee safety.

LEAVING VICTORY PROGRAMS

RESIGNATION

When an employee decides to leave for any reason, his/her supervisor and the Human Resources Department would like the opportunity to discuss the resignation before final action is taken. Victory Programs often finds during this conversation that another alternative may be better. If, however, after full consideration the employee decides to leave, it is requested that the employee provide a written two-week advance notice period (bear in mind that vacation days or personal days may not be included in the two-week notice period). If, as sometimes happens, the employee's supervisor wishes for the employee to leave prior to the end of the employee's two-weeks notice, the employee may be paid for the remainder of that period.

DISMISSALS

Every Victory Program employee has the status of "employee-at-will," meaning that no one has a contractual right, express or implied, to remain in Victory Programs' employ. Victory Programs may terminate an employee's employment, or an employee may terminate his/her employment, without cause, and with or without notice, at any time for any reason. No supervisor or other representative of Victory Programs (except the President/Executive Director) has the authority to enter into any agreement for employment for any specified period of time, or to make any agreement contrary to the above.

THE FOLLOWING GUIDELINES MAY BE APPLIED AT THE DISCRETION OF VICTORY PROGRAMS' MANAGEMENT:

Immediate dismissal/misconduct

Any employee whose conduct, actions or performance violates or conflicts with Victory Programs' policies and procedures may be terminated immediately and without warning.

The following are some examples of grounds for immediate dismissal of an employee:

- Breach of trust or dishonesty
- Conviction of a felony
- Dual relationships with clients either sexual or financial
- Willful violation of an established policy or rule
- Falsification of agency records
- Gross negligence
- Insubordination
- Violation of the Anti-Harassment and/or Equal Employment Opportunity Policies
- Falsification of Time Sheets
- Undue and unauthorized absence from duty during regularly scheduled work hours
- Deliberate non-performance of work
- Larceny or unauthorized possession of, or the use of, property belonging to any co-worker, visitor, or client of Victory Programs
- Possession of dangerous weapons on the premises
- Unauthorized possession, use or copying of any records that are the property of Victory Programs
- Unauthorized posting or removal of notices from bulletin boards
- Excessive absenteeism or lateness
- Marring, defacing or other willful destruction of any supplies, equipment or property of Victory Programs
- Failure to call or directly contact your supervisor when you will be late or absent from work
- Fighting or serious breach of acceptable behavior
- Violation of the Alcohol or Drug Policy
- Theft

Violation of the Agency's Conflict of Interest Policy and /or Confidentiality Policy
Gambling, conducting games of chance or possession of such devices on premises or during work hours
Leaving the work premises without authorization during work hours
Sleeping on duty
Use or racial or ethnic slurs

This list is intended to be representative of the types of activities that may result in disciplinary action. It is not exhaustive, and is not intended to be comprehensive and does not change the employment-at-will relationship between the employee and Victory Programs.

In the event of dismissal for misconduct, all benefits end at the end of the month. COBRA may not be available to anyone dismissed from Victory Programs for gross misconduct.

Discipline other than immediate termination

All employees are expected to meet Victory Programs' standards of work performance. Work performance encompasses many factors, including attendance, punctuality, personal conduct, job proficiency and general compliance with Victory Programs' policies and procedures.

If an employee does not meet these standards, Victory Programs may, under appropriate circumstances, take corrective action, other than immediate dismissal.

POST RESIGNATION/TERMINATION PROCEDURES

Exit Interview

In order to improve the working environment and clarify all matter relevant to an employee's termination, Victory Programs requires all personnel leaving the employment of Victory Programs to participate in an exit interview with their supervisor or Human Resources. This interview covers, among other things, conversion of an employee's accrued earned time, extension or termination of insurance coverage and return of Victory Programs' property;

Picture Identification Card
Office keys/security card
Agency-issued credit cards
Any additional Agency-owned or issued property

In order to receive a disbursement of any amounts due from the 401-K Retirement Plan, the employee is required to contact our plan administrator. You can request this information from the Human Resources Department.

Employees may choose the continuation or waiver of comprehensive medical coverage and dental coverage under COBRA. Specific information will be mailed to your home address within seven (7) days of termination.

Benefits Continuation (COBRA)

An employee, unless dismissed for gross misconduct, generally has the option to convert to individual life insurance, and/or to continue Medical/Dental Benefits in accordance with the Consolidated Omnibus Budget Reconciliation Act ("COBRA") regulations.

SAFETY

EMERGENCY WEATHER POLICY

Due to the nature of services provided at Victory Programs, it is necessary that all employees make every effort to report to their work shift in the event of a snowstorm or other adverse weather situation. If you find you cannot report to work, you must call your supervisor as soon as possible so that a replacement worker can be found. If you do not report to work, you must use accrued earned time in order to be paid. Non-exempt employees who stay over a shift will be paid time and one half for the additional shift.

In the event the Governor declares a state of emergency due to poor weather conditions and travel is difficult, employees will be contacted by their supervisors as to who should report to work. Employees who are sent home or are told not to report will be paid. Overtime rules will apply for non-exempt employees who are asked to report to work or asked to stay beyond their regularly scheduled shift. Any exceptions to this policy are at the discretion of the Executive Director.

VEHICLE SAFETY POLICY

The purpose of the vehicle safety program is to provide for the safe and legal operation of Victory Programs owned/leased vehicles. To ensure that Victory Program vehicles are driven in a safe, legal and considerate manner the following policies are to be followed:

- Only Victory Programs employees who are authorized drivers may drive agency motor vehicles.
- Authorized drivers are limited to employees of Victory Programs.
- Drivers must be at least 25 years of age, have a valid Massachusetts driver's license, and have proof of MA Division of Motor Vehicle *surchargeable points* of no more than 3.
- Annually upon original hire date - all drivers must provide a copy of their current driver's license and an updated copy of their motor vehicle driving record for review.
- Licenses and motor vehicle records may also be requested at any time.
- Employees who may occasionally use their personal vehicle to transport clients **in an emergency only** must have prior approval from their Program Director and Human Resources must be notified.

Motor Vehicle Safety & Operating Rules:

- Drivers are to comply with all state laws and federal regulations concerning driving practices and the legal and permissible uses and operation of vehicles.
- Driving Victory Programs owned, leased, or rented vehicles is to be considered a privilege not a right.
- Drivers are not to carry passengers who are not part of authorized business.
- Drivers and passengers are to wear seat belts at all times.
- The use of Victory Programs owned, leased, or rented vehicles for personal purposes is not permitted.
- Smoking and use of cell phones or headphones are not allowed while driving Victory Programs vehicles.
- Vehicles should never be overloaded, i.e. if you have a 7-passenger van you should have no more than 7 passengers including the driver, etc.
- Drivers are responsible for accurately completing the travel log located in each vehicle and must report missing or full log books to the program director for replacement.
- Motor vehicle maintenance is the responsibility of the program where the vehicle is garaged. The program director is responsible for all travel logs and ensuring that vehicle maintenance is in compliance with owner's manual and that these activities are documented in log.
- All traffic offenses fines, payments or penalties are the personal obligation of the driver and should be paid within 14 days so as not to incur late penalties. Copies of traffic tickets, fines, citations etc. should be made

and sent to the Director of Human Resources. Failure to comply will result in disciplinary action up to and including termination.

Driving privileges may be revoked and the employee temporarily suspended or terminated when it has been determined that one of the following offenses occurred:

- Operating a Victory Programs vehicle under the influence of alcohol or illegal drugs.
- Leaving the scene of an accident without completing necessary paperwork.
- Losing his/her driver's license because of suspension, revocation, or denial of a driver's license.
- A driver's surchargeable point total goes above the maximum of 3 points. It is the driver's obligation to notify HR whenever points are added to their motor vehicle record. Failure to update this information could lead to disciplinary action up to and including termination.

Vehicle Inspection & Maintenance

Program Directors will be responsible for ensuring the following:

- Yearly inspection sticker
- 3,000 mile oil change & lubrication
- Safety inspection forms should be completed monthly and turned in to Director of Facilities
- Monthly cleaning inside and out
- 2 sets of keys for each vehicle; 1 set to be kept at Administration in the Director of Facilities office.
- Mileage Logs should be filled out each time an agency vehicle is used. Logs should be turned in on the last day of the month to the Director of Facilities.
- Gas Card should not be kept in the vehicle. Receipts showing Program name and vehicle license number should be sent to the A/P Coordinator.
- Weekly vehicle sign in and out schedules should be maintained.

Accident Reporting

Police report should be filled out within 24 hours for accidents not involving personal injury. Program Director keeps a copy.

Incidents reports should be filled out within 24 hours and attached to the DMV report, signed by the Program Director, and sent to the Executive Assistant at Administration. Care and diligence is to be exercised to obtain accurate information on driver, including name, address, license number, and license expiration date. Information should also be gathered on passengers, witnesses, facts and circumstances of the accident. An Emergency Incident Report should be filled out if employee sustains bodily injury, and a Workers Compensation claim filed within 24 hours.

Driver Education/Training

Victory Programs is committed to the development of responsible drivers. To this end Victory Programs may require designated drivers to attend a mandatory refresher course at the agency's expense. The Director of Facilities and the Directors of Human Resources will review all accidents whether minor or major. Their review will determine whether the employee will still be eligible for driving privileges, and if any other course of action needs to be taken.

Victory Programs maintains the right to revoke, suspend or terminate any employee from driving any Victory Programs vehicle or vehicle replacement for violations of any of these policies.

Accidents and Emergencies

Maintaining a safe working environment requires the continuous cooperation of all employees. Victory Programs strongly encourages employees to communicate with fellow employees and their supervisor regarding safety issues.

All employees will be provided care, first-aid and emergency service, as required, for injuries or illnesses while on Victory Programs premises. Employees should contact their supervisor, the nearest supervisor and or 911 in the event of an accident or emergency.

If an employee is injured on the job, Victory Programs provides coverage and protection in accordance with the Worker's Compensation Law. When an injury is sustained while at work, it must be reported immediately to the employee's supervisor, who in turn will notify the Human Resources Department of the incident.

Failure to report accidents is a serious matter as it may preclude an employee's coverage under Worker's Compensation Insurance.

SAFETY COMMITTEE

Victory Programs has a Safety Committee that meets once a month. The committee is committed to ensuring the safety and well being of all clients and staff. It is also the responsibility of each employee to make sure that all tasks are conducted in a safe and efficient manner complying with all local, state and federal safety and health regulations, program standards, and with any special safety concerns identified for a particular area or with clients. Although most safety regulations are consistent throughout each department and program, it is the responsibility of the employee to identify and familiarize him/herself with the safety manual in their program. The safety manual will have detailed procedures for dealing with emergencies such as fire, weather, no heat, electrical problems, medical emergencies, etc.

