



**SKILS'KIN**

# **EMPLOYEE HANDBOOK**

*AUGUST 2014*

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## WELCOME TO SKILS'KIN

From the Governing Body of SKILS'KIN, Congratulations! You have successfully been selected for employment with the leading Community Rehabilitation Program in this region. Our mission is:

*To provide supports and services to adults with disabilities to expand their employment and living opportunities.*

SKILS'KIN has prepared this employment handbook as a guide to assist you in understanding our expectations, to provide you with information concerning personnel policies and procedures and to help make your employment relationship with SKILS'KIN mutually beneficial. This handbook, updated August 2014, replaces and supersedes any and all prior handbooks and/or workplace practices.

I encourage you to communicate with your supervisor if you have any questions. I, also encourage you to take advantage of your supervisor's willingness to provide you with a thorough orientation to our company and to show you how your contributions will enhance our efforts to accomplish our mission.

Having the opportunity to work with people with disabilities is intensely rewarding. Our goal is to create a positive and productive work environment.

Sincerely,

*Brian Behler*

BRIAN BEHLER  
Chief Executive Officer

## **INTRODUCTION**

The purpose of this handbook is to provide information to employees about basic personnel policies observed at SKILS'KIN. The handbook provides basic information as a guideline for employees about general personnel policies.

**THIS HANDBOOK IS NOT AN EMPLOYMENT CONTRACT AND IT IS NOT A GUARANTEE OF EMPLOYMENT FOR A DEFINITE TERM. FURTHERMORE, IT IS NOT PART OF THE EMPLOYMENT RELATIONSHIP. THIS HANDBOOK IS INTENDED AS A GUIDELINE FOR MANAGEMENT AND EMPLOYEES WHICH SKILS'KIN MAY OR MAY NOT FOLLOW IN ITS SOLE DISCRETION.**

This handbook will not address every situation which could concern you as an employee. You are encouraged to consult with the Human Resources Department regarding any particular questions you may have.

## **EQUAL EMPLOYMENT OPPORTUNITY**

Under its policy of Equal Employment Opportunity, SKILS'KIN does not discriminate against any employee or applicant for employment because of age, gender, sexual orientation, religion, marital status, veteran status, creed, color, race, national origin, or the presence of any sensory, mental or physical disability, or family and/or caregiver responsibilities. This policy applies in all areas of SKILS'KIN'S operation including recruitment, advertisement, purchasing, interviewing, hiring, promotions, transfers, demotions, upgrades, compensation, benefits, training and development, position elimination, terminations, return from layoffs, recreation programs, and all other privileges, terms, and conditions of employment.

SKILS'KIN adheres to all guidelines contained in the Americans with Disabilities Act, as well as Title VII of the federal Civil Rights Act of 1964, and all other applicable federal employment laws. SKILS'KIN also adheres to applicable state employment laws, as appropriate depending upon the employee's work location (currently Washington, Montana and Wyoming). You should address any questions or concerns relating to any perceived discrimination to your manager or Human Resources.

## **NATURE OF EMPLOYMENT**

**THE NATURE OF THE EMPLOYMENT RELATIONSHIP FOR SKILS'KIN EMPLOYEES IN WASHINGTON AND WYOMING IS AT-WILL, WHICH MEANS THAT EITHER THE EMPLOYEE OR SKILS'KIN MAY TERMINATE THE EMPLOYMENT RELATIONSHIP WITH OR WITHOUT CAUSE, WITHOUT NOTICE, AT ANY TIME, REGARDLESS OF THE TIME AND MANNER OF PAYMENT OF WAGES OR SALARY.**

**SKILS’KIN EMPLOYEES IN MONTANA WHO ARE SUBJECT TO A ONE YEAR PROBATIONARY PERIOD ARE ALSO SUBJECT TO THIS POLICY. ALL NON-PROBATIONARY MONTANA EMPLOYEES ARE SUBJECT TO MONTANA LAW AND ITS RELATED STATUTE PERTAINING TO JUST CAUSE.**

No representative of SKILS’KIN other than the Chief Executive Officer or his/her designee has authority to enter into any agreement of employment for a definite period of time or to make any agreement contrary to this handbook. Any such agreement must be in writing and signed by both parties. Furthermore, no one other than the Chief Executive Officer or his/her designee may alter or modify any of the policies in this handbook. No statement or promise by the Chief Executive Officer, or any representative, may be interpreted as an official change in policy nor will it constitute an agreement with an employee.

## **EMPLOYMENT BASICS**

### ***EMPLOYMENT CLASSIFICATIONS***

The following are a few of the classifications that are used throughout this handbook. This information is provided so that employees understand their employment status and eligibility for benefits. All employees are hired for an unspecified duration. These classifications do not guarantee employment for any specific length of time. The employer and employee retain the right to terminate employment at any time, without reason or notice, unless otherwise prohibited by law. (See, Nature of Employment Relationship.)

1. **Exemption Status:** Employees are either nonexempt or exempt from federal and state wage and hour laws. Employees will be informed of their exempt or nonexempt status upon hire. If you have further questions regarding your status, please contact your supervisor.
  - a. **Nonexempt** employees are entitled to overtime compensation pursuant to certain provision of federal and state law. Such employees are also covered by minimum wage and record keeping requirements.
  - b. **Exempt** employees are excluded from specific provisions of state and federal law requiring overtime pay, minimum wage, and record keeping. These employees include any employee in a bona fide executive, administrative, or professional capacity, or in the position of outside sales or certain computer personnel and highly compensated employees as defined by federal or state law. Some employees in certain employment categories are exempt only from overtime pay requirements.
2. **Regular Employee:** An employee who has successfully completed the probationary period.

3. **Full-Time Employee Non SCA\*:** An employee who is hired to work on a regular and predetermined schedule of at least 30 hours per week (eff. 1/1/2015). Full-time employees are eligible for benefits once they satisfy the terms and conditions of the various benefit programs.
3. **Full-Time Employee SCA\*:** An employee who is hired to work on a regular and predetermined schedule of at least 30 hours per week. Full-time employees are eligible for benefits once they satisfy the terms and conditions of the benefit programs.
4. **Half-Time Employee Non SCA\*:** An employee who is hired to work on a regular and predetermined schedule between 20 and 29 hours per week (eff.1/1/2015). A half-time employee may be eligible for prorated benefits.
5. **Half-Time Employee SCA\*:** An employee who is hired to work on a regular and predetermined schedule between 20 and 29 hours per week. A half-time employee may be eligible for prorated benefits.
6. **Part-Time Employee:** An employee who is hired to work less than 19 hours per week.
7. **Seasonal Employee:** An employee who is hired for work that is seasonal in nature. Example: May – October work.
8. **Temporary and Work Study Employees:** An employee who is hired on a temporary basis, usually with a determined regular work schedule in mind, with the expectation that he or she will be employed for a finite period of time.
9. **On-Call Employee:** An employee who is hired to work on an as-needed basis and without a regular work schedule in mind. These employees work only when needed by SKILS’KIN, i.e. when production demands exceed the capabilities of our regular work force.

\* SCA- Service Contract Act- Employees who are employed by SKILS’KIN on a federal contract are subject to employment terms as stated in the U.S. Government Service Contract Act.

### ***WORKWEEK AND SCHEDULING***

Various factors such as work load, operational efficiency and staffing needs may require variations in the employee's starting and quitting times and total hours worked each day or each week. Thus, we reserve the right to assign employees to jobs or shifts other than their usual assignment when required. Additionally, employees may be required to work overtime or hours other than those normally scheduled whenever necessary. Punctual and consistent maintenance of standard attendance is a condition of employment.

For payroll and accounting purposes, the workweek begins at 12 a.m. on Sunday and ends at midnight the following Saturday. Our normal business hours differ among departments.



Please check with your supervisor for the normal business hours in your department. SKILS'KIN may establish workdays or workweeks for individual employees or certain positions.

Work schedules are established by your manager or immediate supervisor. You are expected to work all of the hours and days assigned. Employees are also expected to be at their workstations and ready to work at the beginning of their assigned shift. Work schedules may be posted in advance. Review the schedule thoroughly so that you are familiar with your assigned hours and days off.

On occasion, an employee will report to work their regularly scheduled time, only to have their supervisor report that there is no work to perform that day. The employee is sent home due to lack of work. In this event, the employee is not compensated if they were sent home prior to their shift start. Any time worked should be compensated, in 15 minute increments, at their regular pay rate. Exceptions to this policy must be approved by the Human Resources Director.

Personal schedules should be arranged to accommodate established working hours. Requests for changes in schedules or for particular days off must be made ahead of time and approved in advance by your supervisor and the individual who schedules work in your department. Employees absent for three days who have not contacted their supervisor will be considered to have voluntarily terminated employment as of the end of their third day missed.

\*CLS employees- please refer to your specific department's attendance policy

### ***REST AND MEAL PERIODS***

All nonexempt employees receive one 10-minute paid break for each four hours of working time. No employee can be required to work more than three hours without a rest period. Ideally, the break will occur near the midpoint of each four-hour work period, but scheduling will be done by your supervisor or the department head. Break periods may not be used to extend a lunch period, work overtime or leave early.

If nonexempt employees work more than five consecutive hours in a day, they are required to take a meal break two to five hours into their shift unless they have chosen to waive this break in writing. The normal meal break is a 30-minute unpaid period. If you work three or more hours beyond your scheduled shift, you will have an additional meal period before or during that period.

It is expected that personal activities such as smoking will occur only during authorized break periods. Violation of this expectation may result in disciplinary action.

### ***OVERTIME***

The regular workweek is 40 working hours; however, as the need arises, your supervisor may ask you to work beyond your normal shift. Although you may be given advance notice when feasible, this is not always possible. Any overtime must be authorized by your

supervisor or department head before it is worked. Overtime is paid to all nonexempt employees. The overtime pay rate is one and one-half times the regular rate of pay for all hours worked over 40 hours in a single workweek. Exempt employees receive no overtime compensation.

Nonexempt employees must begin work no earlier than seven minutes before their shift starts and end work no later than seven minutes after their shift ends. You may not report earlier or stay later without the specific advance, approval of your supervisor. Unauthorized overtime or other violations of this policy are subject to discipline, up to and including termination.

### ***RECORDKEEPING AND REPORTING***

Accurate records of the hours you work ensure that you will be paid correctly and you will receive full credit for the work you do. All SKILS’KIN employees use the current timekeeping system to record hours worked. Methods of timekeeping may vary based on department and location. You are responsible for the accuracy and completeness of the information on your record of time in the timekeeping system.

Time and attendance records are the property of SKILS’KIN. Unauthorized alteration or falsification of any time record is strictly prohibited and may subject the employee to discipline, up to and including immediate termination of employment. No employee is permitted to clock in or out for another employee. Such action may subject any involved employee to discipline, up to and including immediate termination of employment. If an employee repeatedly has errors on their time record, they may be subject to disciplinary action up to and including termination.

### ***COMPENSATION***

When you begin employment with SKILS’KIN you are told your rate of pay. Pay decisions are based on SKILS’KIN’S assessment of your position, training, experience, the market for similar jobs and the pay relationship between your job, other jobs and other employees.

Increases in compensation can be tied to your overall job performance. However, increases may be granted at any time they are deemed warranted by increased responsibilities or due to changes in market conditions. Similarly, there may be no increase if performance, market or financial conditions do not warrant it. The provision of any increases is solely at the discretion of SKILS’KIN.

It is our policy to ensure exempt employees are not subject to improper salary deductions that would indicate they are being paid on an hourly basis. This organization prohibits deductions from exempt employees’ salary based on hourly quotas, absences of less than a full day that are not taken along with FMLA leave, partial week absences occasioned by our operating requirements, jury duty or attendance as a witness for less than a week, military service of only part of a week, or unpaid disciplinary suspensions that are not related to serious safety infractions and for less than a week. If an employee believes his or her compensation has been subject to improper deductions like those noted above, the

employee should immediately contact his or her supervisor or Human Resources. The matter will be reviewed thoroughly and promptly. If improper deductions have been made, any needed corrections, including the payment of deducted sums, will be made as soon as possible. Employees should raise these concerns in order to protect themselves and the organization and shall not be retaliated against for doing so. Similarly, if you have any questions about exempt status, please speak with your supervisor.

1. **Paydays:** SKILS’KIN paydays are bi-weekly. A schedule of paydays can be provided to you by the Human Resource department.
2. **Payroll Deductions:** The following deductions from your paycheck are required by law: FICA (social security and Medicare), federal income tax, and all other applicable state and federal taxes and for Washington State employees, the employee portion of the industrial insurance premium. SKILS’KIN will honor administrative and court orders for garnishment or wage withholding pursuant to state and federal law. Any other deductions may require written authorization from the employee. Examples of such deductions include deductions for your portion of any insurance premiums or deductions for a bus pass.
3. **Direct Deposit:** SKILS’KIN offers employees the option of direct deposit. Employees may sign up for direct deposit at any time. Please see the Human Resource Department if you are interested in the convenient option.

### ***EMPLOYMENT OF RELATIVES***

SKILS’KIN believes that it is in the best interests of all involved to keep business and professional relationships separate from personal and family relationships so as to avoid potential conflicts of interest. Accordingly, we may not employ close relatives, spouses, two individuals living together in a relationship that is essentially equivalent to marriage, or two individuals involved in a dating relationship, except under circumstances where (1) neither employee will supervise, appoint or discipline the other; (2) neither party will evaluate the work of the other; and (3) the working relationship will not create a conflict of interest or the appearance of favoritism in the opinion of management. If two employees who work in the same department or supervise each other develop a dating or marital relationship after employment, one of the two may be transferred or if no suitable position is available may be terminated.

SKILS’KIN also reserves the right not to employ close relatives of officers or other high-level employees of our customers, competitors or others with whom we have business relationships, where such a restriction is necessary to avoid the actuality or appearance of conflict of interest or to protect confidential information. For purposes of this policy, relatives include: spouses, domestic partners, siblings, parents, step-parents, children, grandparents, grandchildren, aunts, uncles, nieces, nephews and people living in the same household.

## ***PERSONAL INFORMATION AND RELEASE OF PERSONNEL RECORDS***

Your personnel records are considered confidential company property. Although we are required to comply with subpoenas, court orders and government requests directing us to provide information from your personnel records, generally speaking, without written authorization from you, only your job title and verification of employment dates will be released.

Additionally, as part of the enforcement of court ordered child support payments, Wyoming, Montana, or Washington State employers must report all persons hired or returning from leave or layoff to the Wyoming, Montana or Washington State Support Registry, along with relevant details of their employment.

SKILS'KIN shall determine if there is any irrelevant or erroneous information in the file and shall remove all such information from the file. If an employee does not agree with SKILS'KIN'S determination, the employee may, at his or her request, have placed in the employee's personnel file a statement containing the employee's rebuttal or correction. SKILS'KIN is not prevented from removing information.

Requests for personal information shall comply with federal law in regard to HIPAA (protection of personal health information) as well as other state and/or federal privacy laws.

## ***CHANGE OF EMPLOYEE INFORMATION***

In the event of an emergency, SKILS'KIN may need to know how to contact you or your nearest relatives. It is important to both the employee and the company that SKILS'KIN has your most current physical and mailing address ,and telephone number at all times, as well as a current address and telephone number of the person(s) to be contacted in case of an emergency.

When you move, change your telephone number or have other changes in your personal information, inform Human Resources of such changes so we can keep your personnel records accurate and up-to-date. It is your responsibility to be sure that the Human Resources department has your present physical and mailing address and phone number. If your marital status or dependents should change, you may have to change the number of exemptions claimed for income tax withholding purposes and add or delete members of your family on the respective insurance plans.

## ***EMPLOYEE ACCESS TO PERSONNEL RECORDS***

SKILS'KIN will, at least annually, upon the request of an employee, permit the employee to inspect any or all of his or her own personnel file. An employee may petition SKILS'KIN to review all information in the employee's personnel file that is regularly maintained by SKILS'KIN as a part of its business records or subject to reference or information given to persons outside of SKILS'KIN.

You may review your personnel records at a mutually convenient time during regular business hours, one time per year. If you wish to do so, please notify the Human Resources Department so that a mutually agreed upon time may be scheduled. Any concerns regarding the completeness or accuracy of the information contained in your files should be taken up with your immediate supervisor and/or the Human Resources Department. If you disagree with an item in your file, you may appeal to management to have it corrected or removed. If your appeal is denied, you may place your own rebuttal or correction statement in the file.

### ***LEGAL DOCUMENTS***

An employee of SKILS’KIN who is served with legal documents (i.e. subpoena) at work that pertains to the duties that particular employee performs on behalf of SKILS’KIN, should notify the Human Resources Department immediately for further direction.

### ***DISABILITY ACCOMMODATION***

SKILS’KIN will make reasonable accommodations for qualified individuals with disabilities, unless doing so will create an undue hardship on the organization, taking into consideration the nature and cost of the accommodation needed, the employer’s financial resources, and the impact of the needed accommodation on the operation and on other employees and our customers.

An employee of SKILS’KIN who feels he/she is in need of accommodation should communicate that information to his/her manager and Human Resources. Both HR and manager will work with the employee to attempt to accommodate his/her needs through an interactive process between the employee and employer while fulfilling SKILS’KIN’S work requirements, including the essential functions of the employee’s job or duties.

When the disability and/or the need for accommodation are not obvious, the employer may ask the individual for reasonable documentation about his/her disability and functional limitations. All requests for accommodation are treated confidentially, and will only be disclosed to those individuals within the organization who are necessary to the accommodation process.

### ***TRAVEL & EXPENSE REPORTING***

It is SKILS’KIN’S policy to reimburse employees for all business expenses that are necessary, proper, reasonable, permissible and actually incurred while traveling on authorized Company business, provided such expenses are itemized, fully explained and approved on the reimbursement form or expense reporting form currently in use. All travel must be pre-approved by the department manager. Employees who travel on Company business are responsible for knowing and complying with the Company’s Travel Policy, Expense Reimbursement Policy, and any relevant safety policies.

## **COMPANY FACILITIES**

### ***COMMUNICATIONS***

SKILS’KIN wants you to be well informed concerning your workplace, safety rules & regulations, new developments, or changes in policies or your rights under state and/or federal law. The general distribution of memos, payroll slips, and newsletters are utilized for rapid dissemination of information.

Bulletin boards are another official means of communicating information. As a general rule, only those notices which are of general importance or interest will be posted. Such postings are used to communicate announcements required by law, official safety information and other employer notices. Please check these boards frequently, as you are required to be aware of their posted contents. Any item posted on a bulletin board must first be approved by your department manager.

### ***EMPLOYEE PARKING***

Employee parking spaces, in most locations, are provided in the parking lot. General parking is on a first-come, first-serve basis. A number of parking spaces are reserved for SKILS’KIN employees/visitors who have authorized “handicap tags”. You are requested to park only in the spaces provided for employees to ensure ample parking for visitors. Please lock your car while it is parked in the lot. We do not assume responsibility for vehicles or their contents in any parking area, regardless of location.

### ***SMOKING***

Smoking is not allowed in any SKILS’KIN building or vehicle. Smoking by employees is permitted only during rest or meal periods and when on SKILS’KIN property only in areas designated by SKILS’KIN in compliance with state regulations. Additionally, if you are driving your personal vehicle and transporting clients—smoking is prohibited. In the interest of safety, this policy is strictly enforced and violations may result in discipline, up to and including immediate termination of employment.

NOTE: Effective January 1, 2015, SKILS’KIN Boone and Payee Services property will be designated as “Tobacco Free” sites. Use of tobacco products, including E-cigs, is prohibited.

### ***USE OF TELEPHONES***

SKILS’KIN telephone lines are intended solely for business use and should not be used or tied up for personal phone calls. All necessary calls should be made during break periods or the lunch break whenever possible. No personal long distance or toll calls are to be charged to SKILS’KIN. Personal use of your cellular phones should be during break and meal periods. Their use should be kept to a minimum during work hours.

### ***PERSONAL MAIL AND COPYING***

You may not use SKILS’KIN’S name, address or stationery for personal mail. The postage meter and copy machines are available to you on a limited basis.

### ***PROPERTY ISSUE***

During your employment with SKILS’KIN, you may be issued a variety of items that may include clothing, keys, cell phones, laptops, software, etc. You will be expected to sign a ‘Property Issuance’ form that will list these items and their monetary replacement value. Should you lose or not return any of these items, you may be responsible for reimbursing SKILS’KIN in the amount of the monetary replacement value, as permitted by state and federal law.

### ***SEARCHES AND INSPECTIONS***

To ensure security, SKILS’KIN reserves the right to conduct searches of company property, including workstations, desks, file cabinets, lockers and similar areas. This also extends to computers (e-mail and internet), cell phones, and telephones (voice messages). The company may search company areas at any time, either randomly or when there is a reason to believe that prohibited items may be present.

SKILS’KIN reserves the right to conduct searches of your personal possessions, including lunchboxes, briefcases, backpacks, packages or other items carried onto company property. Visual inspections of vehicles may be performed from outside (i.e. looking through the windows). Please be advised that you have no reasonable expectation of privacy or confidentiality as it relates to company property and your personal possessions.

SKILS’KIN reserves the right to deny entrance to any employee who refuses to cooperate with a request to search personal possessions. Employees who refuse to cooperate may be subject to discipline, up to and including immediate discharge from employment.

Any search will be conducted in compliance with all federal, state, local or other laws. Anyone who feels they have been mistreated should report their concerns immediately to their supervisor or Corporate Compliance.

### ***IT POLICIES***

Each employee is required to read the SKILS’KIN network security policies and sign a statement they have read, understand and agree to comply with these policies. A copy of this acknowledgement statement will be kept in their personnel file. The employee’s signature must be witnessed, and the employee will be given a written copy.

All network security policies can be read in their entirety on the company network.

**Violation of these policies or divulging confidential information may lead to immediate termination.**

### **Privacy Policy**

SKILS’KIN provides electronic resources to employees to help them fulfill their assigned work mission. SKILS’KIN routinely monitors electronic data, software, and communications. There should be no expectation of privacy for any information stored, processed, or transmitted on SKILS’KIN IT resources. Users should be aware that any activity on systems and networks may be monitored, logged, and reviewed or may be discovered in legal proceedings. All documents created, stored, transmitted, or received on SKILS’KIN computers and networks are subject to monitoring by systems administrators.

### **Security Awareness**

Employees are SKILS’KIN’S greatest asset as well as its greatest security vulnerability. The purpose of this policy is to ensure that each employee understands their role in maintaining the confidentiality, integrity and availability of critical information assets both internally as well as client’s and member data.

Every employee shall attend an initial security training session as well as annual and periodic training sessions. Employees are required to attend and sign an attendance sheet upon completion. Security Awareness updates will be sent to all users on an as needed basis.

Security reminders will be posted throughout SKILS’KIN’s facilities to remind employees of the common network security risks. Information will also be available on the network.

### **Responsibilities**

Security is a team effort and each SKILS’KIN employee has the responsibility to help maintain information security. SKILS’KIN provides its users with multiple resources that will assist in keeping our network clear of viruses and malware; more importantly, in order for this to work it requires the vigilance of all employees.

Employees are strongly encouraged to report to their manager any suspicious actions or activities pertaining to computers, network addresses, phones, software, hardware, users IDs and passwords.

With the exception of providing a SKILS’KIN employee email address, users shall not divulge network information to anyone asking for such information, but rather ask for their contact information and refer the questions to their manager.



## **Password Policy**

All user-level passwords (e.g., email, web, desktop computer, etc.) must be changed at least periodically. The recommended change interval is every four months. Passwords must not be inserted into email messages or other forms of electronic communication. Passwords should not be written down or stored on-line. All passwords are to be treated as sensitive, confidential SKILS'KIN information.

All user-level and system-level passwords must conform to these requirements described below.

- Contain both upper and lower case characters (e.g., a-z, A-Z)
- Have digits and punctuation characters as well as letters e.g., 0-9, !@#\$%^&\*()\_+|~- =\`{ }[]:"';<>?,./)
- Are at least eight alphanumeric characters long and is a passphrase (Ohmy1stubbedmyt0e).
- Are not words in any language, slang, dialect, jargon, etc.

Do not use the same password for SKILS'KIN accounts as for other non- SKILS'KIN access (e.g., personal ISP account, option trading, benefits, etc.).

**Do not share SKILS'KIN passwords with anyone, including administrative assistants or secretaries.**

The list of "Don'ts":

- Don't reveal a password over the phone to ANYONE;
- Don't reveal a password in an email message;
- Don't reveal a password to the boss;
- Don't talk about a password in front of others;
- Don't hint at the format of a password (e.g., "my family name");
- Don't reveal a password on questionnaires or security forms;
- Don't share a password with family members;
- Don't reveal a password to co-workers while on vacation;  
If someone demands a password, refer them to your manager.
- Do not use the "Remember Password" feature of applications (e.g., Eudora, Outlook, Netscape Messenger);
- Don't write passwords down and store them anywhere in your office;
- Don't store passwords in a file on ANY computer system (including Palm Pilots or similar devices) without encryption. SKILS'KIN does utilize and require users to establish their own PASSWORD SAFE, the master of each is then stored in a Master PASSWORD SAFE vault for emergency access only.

If an account or password is suspected to have been compromised, report the incident to your manager immediately.

## Acceptable Use Policy

- You may use only the computers, computer accounts, and computer files for which you have authorization.
- You may not use another individual's account, or attempt to capture or guess other users' passwords.
- You may not enable unauthorized users to access the network by using a SKILS'KIN computer or a personal computer that is connected to the SKILS'KIN network. This includes family use of SKILS'KIN computers taken home and personal computers that have an established VPN connection to SKILS'KIN networks. (disconnect VPN connection when others use your personal computer)
- SKILS'KIN computers, smart phones and network shall NOT be used for Yahoo Messenger, My Space, Facebook, Nebo, Linked In, or other social websites, other external mail, chat sites, or other sites that may be blocked without the prior notification and approval of your manager.
- In order to maximize bandwidth for business purposes, users shall not use web streaming, streaming media, live streaming or non-streaming music, radio, TV, movies, Internet TV, such as YOU TUBE, etc.
- SKILS'KIN is bound by its contractual and license agreements respecting certain third party resources; you are expected to comply with all such agreements when using such resources.
- You must lock your SKILS'KIN network terminal or computer when you are away from it for more than five minutes (press the "Windows" and "L" keys at the same time), or use screensavers with resume passwords, etc. You should try and move your monitor where it cannot be readily viewed by others.
- You must not attempt to access restricted portions of the network, an operating system, security software or other administrative applications without appropriate authorization by the information owner or your manager.
- You must not develop or use programs, software, processes, or automated transaction-based commands that disrupt other computer or network users or that damage or degrade performance, software or hardware components of a system.
- Do not download and/or use tools that are normally used to assess security or to attack computer systems or networks (e.g., password "crackers", vulnerability scanners, network sniffers, etc.) unless you have been specifically authorized to do so by your manager.
- Do not download and or run any executable (.exe, .vb,) nor open any email attachments from a non-trusted sender that may contain malware.

- Abide by all federal, state and local laws.
- Abide by all applicable copyright laws and licenses.
- Do not use, copy, or distribute copyrighted works (including but not limited to Web page graphics, sound files, film clips, trademarks, software and logos) unless you have a legal right to use, copy, distribute, or otherwise exploit the copyrighted work.
- All users of the SKILS' KIN network and computing resources are expected to respect the privacy and personal rights of others
- Do not access or copy another user's email, data, programs, or other files without the written permission of that person or your manager.
- Be professional and respectful when using computing systems to communicate with others; the use of computing resources to libel, slander, or harass any other person is not allowed.
- Staff shall not disable or otherwise turn off their assigned computer's firewall or anti-virus.

## **EMPLOYEE PERFORMANCE**

### ***TEAM COMMUNICATION***

Good listening is essential for members of any team, especially to successfully influence or lead. Sometimes employees need help in solving a problem. We realize that not only work related problems but also personal problems can affect work performance. Therefore, we will strive to help in all types of situations. Please use the following three important principles as we try our best to improve communication and build mutual trust:

#1 **GIVE THE PERSON WITH WHOM YOU HAVE A PROBLEM THE FIRST CHANCE TO CORRECT.**

Teams are disrupted when communication is "behind the back." Just as you would like to be the first to know if someone has a problem with you, you should bring any concerns you have directly to the person involved. Just as you would not like to be criticized behind your back, give others the chance for a private discussion of your concerns whenever possible.

#2 **LISTEN, LISTEN, LISTEN**

Missing key information is a prime cause of little mistakes and big disasters. Pay attention to what the other person is saying and how they seem to feel about the situation. Clarify any possible misunderstanding. Repeat it to be sure you understand. Ask open ended questions like "How?", "What?", "Why?" .

### #3 PROBLEM RESOLUTION THROUGH INTERVENTION

In our desire and willingness to listen to our employees, we encourage supervisors to assist in problem solving when resolution between parties requires intervention. You are encouraged to see your immediate supervisor with questions, problems or concerns. Your supervisor may secure the assistance of other resource persons. We will listen to your concerns with respect and do our best to help you solve the problem.

If there is some reason you feel that you cannot bring your concern directly to the person involved or your supervisor, you can exercise your privilege of requesting a meeting with someone in the Human Resources Department. Please remember---do not keep the problem to yourself. We cannot help if we do not know a problem exists.

### ***CONFLICT RESOLUTION PROCEDURE***

If you have a complaint or need a problem solved, we encourage you to bring it up as soon as possible with those who can solve it. Our desire is to recognize a problem early and resolve it quickly, so that we may all concentrate on the reason we are here: To Deliver Mission. SKILS'KIN prohibits any form of retaliation against any employee for good faith actions in filing a complaint under this policy.

Most concerns about safety, wages, hours, supervision, discipline, and application of policy or other working conditions can be solved by talking with your immediate supervisor. Most incidents resolve themselves naturally; however, if you believe a work condition or treatment is unjust, inequitable, a hindrance to effective operation, or creates a problem, you should initially direct your concerns with whom your complaint exists. Please note, however, that if an employee feels a violation of our General Prohibition against Harassment (or related policies) they should contact their manager or Human Resources. Employees are not expected or required to confront the alleged harasser as part of the complaint process.

We wish to make it clear that any employee who is confronted with a problem has various means available, which may be used for resolution or clarification of the issue at hand. To be responsive to our employees and their concerns, SKILS'KIN utilizes both formal and informal conflict resolution procedures that have been designed for the benefit and use of employees, supervisors and management to assist in resolving workplace conflicts. These procedures are designed as a guideline only and have no effect on the at will nature of the employment relationship.

## **1. Step One — Informal Procedure**

- A. The employee's supervisor should be the first source of assistance. If the complaint is with the employee's supervisor, the employee should schedule an appointment with the next level supervisor to discuss the problem giving rise to the complaint within five (5) working days in which the incident occurred
- B. The immediate supervisor should respond to the informal complaint within five (5) days of the meeting held with the complainant employee.

## **2. Step Two — Formal Procedure**

- A. If the discussion with the immediate supervisor does not resolve the problem to the mutual satisfaction of the employee and the supervisor, or if the supervisor does not respond to the complaint, the employee may submit a written complaint. The submission of the written complaint is due within five (5) working days of the response (or lack of response) from the supervisor and must include:
  - 1. The problem and the date when the incident occurred.
  - 2. Verbal or written response from immediate supervisor, if provided, and the date when the employee met with their immediate supervisor.
  - 3. Suggestions on ways to resolve the problem.

Employees may receive assistance with writing their complaints from Human Resources. Complaints must be submitted to the employee's department manager and a copy should be forwarded to Human Resources.

- B. Upon receipt of the formal complaint, the department manager should schedule a meeting with the employee within five (5) working days to discuss the complaint.

Within approximately five (5) working days after the discussion, the director/department head should issue a decision both in writing and orally to the employee filing the complaint.

- C. If the employee is dissatisfied with the decision of the department manager, the employee may within five (5) working days, appeal this decision in writing to the Human Resources Department to investigate the complaint.

Human Resources may call a meeting with the parties directly involved to facilitate a resolution or may refer complaints to a review committee if he/she is of the opinion that the complaint raises serious questions of fact or interpretation of policy. Human Resources may gather further information from involved parties. All involved individuals, other than Human Resources,

will be charged with the responsibility of not discussing the situation with any other employee or with the complainant employee.

- D. If the employee is dissatisfied with the decision of the Human Resources Department, the employee may within five (5) working days, appeal this decision in writing to the CEO to investigate the complaint. The decision of the CEO should be final. In the event the HR Director is the subject of the grievance, the employee may inform the CEO directly or through their manager. In the event the CEO is subject of the grievance, The Board of Directors should be notified through the Board President.

If the employee is not satisfied with the decision and wishes to pursue the matter further, he/she may prepare a written summary of the concerns and request that the matter be reviewed by the Board Personnel Committee that is appointed ad hoc by the Board President. This request should be made through the Human Resources Director who will notify the CEO and the Personnel Committee Chairperson. The Committee, after a full review of the facts (which may include a review of the written summary of the problem, interviews with the people involved, and further investigation if necessary) will inform him/her of its decision usually within 30 working days. The decision of the Committee should be final.

If an employee fails to appeal from one level to the next level of the Conflict Resolution procedure within the time limits established in the procedure, the problem should be considered settled on the basis of the last decision and the problem submitted by the employee should not be subject for further consideration.

SKILS’KIN reserves the right to impose appropriate disciplinary action for any conduct it considers to be disruptive or inappropriate or a violation of its policies and procedures contained herein or a violation of either state or federal law. The circumstances of each situation may differ, and the level of disciplinary action may also vary depending upon factors such as the nature of the offense, whether it is repeated, the employee's work record and the impact of the conduct on the organization.

**SKILS’KIN reserves the right to not follow one or more of the procedural steps set forth under Step One and Step Two of the Conflict Resolution Procedure. (This includes the right to bypass the entire Conflict Resolution Procedure if SKILS’KIN management finds that it is warranted.) The Conflict Resolution Procedure is merely a guideline for employees and management that management may or may not follow, with or without notice, at its sole discretion.**

## ***PERFORMANCE REVIEW***

Ongoing performance reviews provide you and your supervisor, the opportunity to discuss how well you are meeting SKILS'KIN'S expectations, to clarify job responsibilities, and to explore possibilities for improving your work performance. Your performance review is part of your personnel records. You are asked to sign your performance review to indicate that it was reviewed with you; your signature does not necessarily imply agreement with the evaluation.

We may conduct performance reviews at the anniversary date of employment and each anniversary date thereafter. Casual or temporary employees do not receive formal performance reviews, although their performance may be monitored. Performance reviews may also be conducted at other times for specific reasons such as promotion, poor work performance or disciplinary problems.

A leave of absence of 30 days or more may result in your performance review being postponed until you have returned to work and have completed continuous employment equal to the length of the leave of absence.

## ***SUCCESSFUL EMPLOYMENT***

SKILS'KIN believes that each and every employee is the key to the organization's success. Here are a few guidelines that you may find useful in your employment with SKILS'KIN.

## ***ATTENDANCE AND TARDINESS***

Maintenance of regular attendance and punctuality are essential functions of any position with SKILS'KIN. In order to serve our clients and provide for efficient operations, employees must be at work. Furthermore, regular attendance and punctuality show respect for your fellow employees who must do your job in your absence.

It is necessary for you to report to work regularly and on time. If you will be unable to report to work or will be late, you must let your supervisor know as soon as you know you will be absent or tardy and always before your scheduled starting time. There are specific guidelines to be followed by each department. You will receive those instructions shortly after you begin working for SKILS'KIN. If you must leave a message at any of our locations, be sure to state: (1) your reason for being late or for not being able to report to work, (2) the probable duration of your absence, (3) and a telephone number where you can be reached. If your absence or tardiness is due to an emergency, you must call in or have someone call in for you as soon as possible. Attendance or tardiness problems as well as failure to call in may result in discipline, up to and including immediate termination of employment. Any employee who fails to report for work or call in for 3 consecutive workdays will be deemed to have abandoned his or her job.

We realize that on occasion everyone misses work for valid reasons. Excessive absences or tardiness (more than 3 in 6 months), however, even for legitimate reasons, may be cause for discipline, up to and including immediate termination of employment.

\*CLS employees- please refer to your specific department's attendance policy

### ***PERSONAL APPEARANCE***

Public perceptions about SKILS'KIN can help us succeed and prosper or contribute to a loss of business. Perceptions are formed, fairly or not, partly by the outward appearance and dress of our employees. A neat and clean personal appearance is essential to our public perception and your own advancement.

You should wear clothing appropriate for each job. The dress code may be more stringent in areas with higher public contact.

Employees who are inappropriately dressed may be sent home without pay and directed to return to work in proper attire. Uniforms, which we furnish, are not designed for use outside the premises and are not a substitute for personal attire. This policy is a general guideline on dress and grooming standards. Contact your supervisor for specific dress standards for your area.

### ***MANDATED REPORTING***

As a member of the SKILS'KIN team and working with a vulnerable population, you are considered a mandated reporter. As a mandated reporter, you must report any suspected incident of abuse and neglect. If you see signs of abuse or neglect or both, or happen to witness signs of abuse or neglect you need to report it immediately to Adult Protective Services//Complaint Resolution Unit and your supervisor. If you report directly to APS/CRU, please notify your supervisor of the incident immediately. You will be given specific departmental training on what to look for and reporting procedures.

### ***STANDARDS OF CONDUCT AND DISCIPLINE***

SKILS'KIN is involved in a highly competitive business in which many individuals and companies rely on the quality and reliability of our services. Thus, all employees are expected to provide excellent and reliable performance. Any failure to meet this high standard is grounds for concern or discipline, up to and including immediate termination of employment.

By way of example and not limitation, the following conduct is strictly prohibited:

- Failure or refusal to carry out legitimate job assignments and management requests (insubordination);
- Unauthorized release of private employer information;
- Swearing or verbal abuse while on our premises;
- Falsification of any work, personnel or other records;
- Removal of property without permission;



- Unauthorized taking of funds or property or unauthorized charges against an account;
- Dishonesty;
- Discrimination against or harassment of coworkers;
- Possession, consumption or being under the influence of alcohol or a controlled substance, legal or illegal, at work or on our premises;
- Deliberate damage to our property;
- Altercations, fighting or threatening to fight with another;
- Fraternization between staff and client or supervisor and subordinate;
- Participation in a business directly competing with SKILS'KIN;
- Carrying firearms;
- Carrying unauthorized passengers;
- Serious misconduct of any kind;
- Inefficient, substandard, careless or negligent performance of an assigned duty or responsibility; or in the care or use of SKILS'KIN property;
- Excessive absenteeism or tardiness in reporting to work or returning from rest periods or meal periods;
- Failure to report an absence in accordance with the absenteeism policy;
- Failure to comply with safety or security rules and procedures;
- Sleeping on the job; and/or
- Violation of any policy or procedure contained herein.

### ***CONFLICT OF INTEREST/MOONLIGHTING***

All employees should avoid situations that might cause their interests to conflict with those of SKILS'KIN or might compromise our integrity and reputation. A conflict or the appearance of one, occurs when you or an immediate family member use your position at SKILS'KIN for personal benefit through an investment, association or business relationship that interferes with your ability to exercise independent judgment on behalf of SKILS'KIN. An example would be having a financial interest in or moonlighting with, any organization or enterprise that is a customer, supplier or competitor of SKILS'KIN.

Full-time employees are discouraged from accepting second jobs outside, whether self-employment or otherwise. All employees holding or considering second jobs must obtain written permission from their immediate supervisor in order to ensure that the job will not create a conflict of interest or interfere with the proper performance of their duties.

Note: See your manager as department process may vary.

Employees are strongly discouraged from accepting gifts from salespeople, vendors, suppliers or any other type of solicitor. An exception would be if the employee were to be provided a meal during a business meeting or sales presentation. Other exceptions may be approved by your supervisor. Also, before accepting any type of gift or promotional item from an outside entity, you should consult with your supervisor.

## ***GENERAL PROHIBITION OF HARASSMENT***

SKILS’KIN is committed to providing a work environment where all employees are treated with respect and dignity. Therefore, SKILS’KIN expressly prohibits any form of unlawful employee harassment based on race, color, religion, gender, sexual orientation, national origin, age, veteran or marital status, physical or mental disabilities, family and/or caregiver responsibilities or status in any other legally protected group. Harassment may have serious consequences not only for the employees involved, but also for the entire organization. Therefore, it is the responsibility of all employees to cooperate with, and assist in the implementation of, this policy.

It is both illegal and against company policy for any employee, male or female, to harass another employee. By the term “harassment” SKILS’KIN means unwelcome, annoying or offensive conduct directed at another employee such as threats, demands, requests, pursuit, teasing, abuse, taunts, insults, heckling, torment or other similar action.

Each supervisor is responsible for creating and maintaining an atmosphere free of harassment, sexual or otherwise. Furthermore, all employees or supervisors are responsible for respecting the rights of their co-workers, employees, clients, or visitors of SKILS’KIN and strictly adhering to the letter and spirit of this policy.

The provision of detailed information in the policy set forth below relating to “sexual harassment” or “disability harassment” should not be interpreted as a lessened commitment to the prevention of other types of possible unlawful harassment. No type of unlawful harassment is acceptable.

## ***SEXUAL HARASSMENT***

It is both illegal and against policy for any employee or supervisor, male or female, to harass another employee, client, or visitor of SKILS’KIN on the basis of his or her gender. For purposes of this policy, it refers to (1) unwelcome sexual advances, requests for sexual favors, and all other verbal or physical conduct of a sexual nature, and (2) comments, jokes, innuendoes, and other sexually oriented statements, where with respect to any of the above:

- Submission to such conduct is made either explicitly or implicitly a term or condition of employment; or
- Submission to or rejection of such conduct is used as the basis for decisions affecting an individual’s employment; or
- Such conduct has the purpose or effect of creating an intimidating, hostile, or offensive work environment.

Examples of the type of conduct which are likely to violate this policy whether unwelcome or uninvited include, but are not limited to, the following:

- Sexually suggestive touching such as rubbing or massaging someone's neck or shoulders, stroking someone's hair, or intentionally brushing against another's body.
- Grabbing, groping, kissing, or fondling another person, either male or female.
- Lewd, off-color, sexually oriented comments or jokes.
- Sexually suggestive leering or stalking.
- Suggestive or sexually explicit posters, calendars, photographs, graffiti, or cartoons which have the effect of creating a hostile and offensive workplace.
- Sexually explicit or suggestive e-mail or voice mail messages.
- Sexually oriented or explicit remarks, including written or oral references to sexual conduct, gossip regarding one's sex life, body, sexual activities, deficiencies, or prowess.
- Questions about one's sex life or experiences.
- Sexual favors in return for employment rewards, or threats if sexual favors are not provided.
- Sexual assault or rape.
- Any other sexually harassing conduct or behavior deemed inappropriate by SKILS'KIN.

### ***DISABILITY HARASSMENT***

Disability harassment is a form of discriminatory conduct in which the respect and dignity given people of disability is less than that generally given to others. Disability harassment includes, but is not limited to, the following:

- Jokes;
- Slurs or derogatory remarks;
- Posters;
- Graffiti or gestures;
- Unwelcome staring;
- Unnecessary questions about the individual's disability; and
- Conduct intended to interfere with the individual's work performance or create a hostile, intimidating, or offensive work environment.

## ***OTHER HARASSMENT***

Other prohibited conduct may include any of the following actions when such action involves reference to, or is directed at, someone's race, color, religion, gender, sexual orientation, national origin, age, veteran or marital status, physical or mental disabilities, family and/or caregiver responsibilities or status in any other legally protected group:

- Telling jokes, teasing, derogatory remarks;
- Circulating writings, printed material or cartoons; and/or
- Displaying of offensive objects or symbols.

The above examples are for illustrative purposes only. For such behavior to qualify as illegal harassment based upon membership in a protected class it must be sufficiently severe or pervasive so as to reasonably interfere with an employee's terms, conditions, or privileges of employment. Even though a behavior listed above may not qualify as illegal harassment under relevant law, SKILS'KIN still may treat such conduct as inappropriate behavior and discipline the individuals involved. Each and every complaint of harassment, including sexual harassment, will be assessed on a case-by-case basis.

SKILS'KIN will not condone, under any circumstances, illegal harassment, including sexual harassment, by any member of its management team or any other employee, client, visitor, volunteer, or guest. Even conduct that is intended to be "innocent" may still constitute illegal harassment if it falls within the terms of this policy. If a co-worker, client, visitor, volunteer, or guest, or any member of management expresses concern that your behavior may have violated this policy, please respect his or her concern. Regardless of your intent, how others interpret your behavior is important.

This policy is not meant to interfere with or discourage friendships among employees. However, employees must be sensitive to acts or conduct which may be considered offensive by other employees and refrain from engaging in such conduct. Any employee who violates this policy may be subject to discipline up to and including termination.

## ***PROHIBITION OF RETALIATION***

SKILS'KIN prohibits any form of retaliation against any employee for good faith actions in filing a complaint under this policy, reporting suspected harassment, or assisting in a complaint investigation. Improper retaliation may include, but is not limited to, treating the employee who has made a complaint of harassment in a "non-professional" manner, questioning the complaining employee or witnesses about their involvement in an investigation, or otherwise taking retaliatory or negative action against the employee. If you believe that you have been subjected to retaliation for making a complaint of harassment, or if you observe that another employee has been subjected to such retaliation, you are expected to report the matter immediately by using the Complaint Procedure described below.

## ***HARASSMENT /RETALIATION COMPLAINT PROCEDURE***

If you believe that SKILS’KIN’S policies on General Prohibition of Harassment, Sexual Harassment and Prohibition of Retaliation have been violated, you may bring a complaint by contacting any supervisor.

All employees should feel free to make a complaint or discuss this policy with a supervisor if they feel they may have been wrongfully harassed, or if they have questions relating to the issue of harassment. Keep in mind, however, that as a member of management, your supervisor may not take “off the record” complaints and is obligated to provide that information to Human Resources.

In general, if you feel that you have experienced any job related harassment based on your race, color, religion, gender, sexual orientation, national origin, age, veteran or marital status, physical or mental disabilities, family and/or caregiver responsibilities or status in any other legally protected group, you should contact your manager or Human Resources.

## ***DRUG FREE WORKPLACE***

The dangers and costs associated with drug and alcohol abuse (substance abuse) are significant and are manifested in a number of ways. Substance abuse not only leads to decreased productivity, it also leads to increased accidents, tardiness, absenteeism, property damage, workers’ compensation costs, health insurance costs, employee turnover, and employee theft. With this policy, SKILS’KIN intends to provide a working environment free of substance abuse and its attendant dangers and costs. This policy applies to all employees of SKILS’KIN and all applicants applying for such employment.

### **I. DEFINITIONS:**

As used throughout this policy, the following terms have the following meaning:

- A. **Accident** means an event involving a company employee and/or company property while on working time involving injury to or loss of human life, or damage to company property exceeding \$250.00(\$1500.00 in MT), or involving a driving citation for a moving traffic violation arising out of an accident.
- B. **Alcohol** means the intoxicating agent in beverage alcohol, ethyl alcohol or other low molecular weight alcohols including methyl and isopropyl alcohol.
- C. **Alcohol Concentration** (or content) means the alcohol in a volume of breath expressed in terms of grams of alcohol per 210 liters of breath as indicated by an evidential breath test (EBT), or greater than or equal to 0.02% using human saliva.

D. **Collection Site** means a place designated by SKILS’KIN where individuals present themselves for the purpose of providing a specimen of their urine subsequently to be analyzed at a laboratory for the presence of drugs. For purposes of alcohol testing, collection site means a place designated by the employer that conducts alcohol breath testing with an evidential breath testing device (EBT) defined herein. SKILS’KIN may also conduct on-site drug and alcohol testing using a one-step oral fluid test procedure.

E. **Drugs** covered by this policy include marijuana, cocaine, opiates, phencyclidine, amphetamines, and methamphetamines.

F. **Employee** means any person working for SKILS’KIN, including, but not limited to, persons paid hourly, by a salary, temporary personnel, and volunteers.

G. **Evidential Breath Testing (EBT) Device** means a device approved by the National Highway Traffic Safety Administration (NHTSA) for the evidential testing of breath. The device is found on the NHTSA’s “Conforming Products List of Evidential Breath Measurement Devices” (CPL).

H. **Medical Review Officer (MRO)** means a licensed physician (medical doctor or doctor of osteopathy) responsible for receiving laboratory results generated by an employer’s drug testing program who has knowledge of substance abuse disorders and has appropriate medical training to interpret and evaluate an individual’s positive test result together with his or her medical history and any other relevant biomedical information.

I. **Nonprescription Medication** means a drug or medication authorized under federal or state law for general distribution and use without a prescription in the treatment of human disease, ailments or injuries.

J. **Positive Alcohol Test** means scoring a breath alcohol concentration of 0.02 grams per liter or greater on an EBT, or as the result of an oral fluid test, conducted on-site.

K. **Positive Drug Test** means an employee urine specimen which has been tested by a United States Department of Health and Human Services (DHHS) certified drug testing laboratory, and has been determined to contain particular concentrations of one or more of the drugs defined in this policy. A positive drug test could also be determined after reading an oral fluid test result, conducted on-site.

L. **Prescription Medication** means a drug or medication lawfully prescribed by a physician, or other health care provider licensed to prescribe medication, for an individual and taken in accordance with the prescription.

M. **Reasonable Suspicion (R/S)** means specific, contemporaneous, articulable, observations concerning the appearance, behavior, speech or body odors of an employee that leads a company supervisor, manager or other company designated official to reasonably conclude that a testing covered employee is in violation of one or more of the prohibitions set forth in this policy.

N. **Refusing to Submit** to a substance abuse test, whether for drugs or alcohol or both, means: (i) unwillingness to make oneself available for one or more of the substance abuse tests identified in this policy; or (ii) altering, adulterating, diluting or otherwise tampering with a specimen sample. Such action will result in disciplinary action, up to and including immediate termination of employment.

O. **Verified Positive Drug test** means a positive drug test which has been reviewed and confirmed as positive by a MRO in accordance with Guidelines promulgated by the United States Department of Health and Human Services.

P. **Work, Working and on Working Time** either used together or independently throughout this policy, means all time from the time an employee is scheduled to begin work or is required to be in readiness to work (e.g., rest and meal breaks) until the time he or she is relieved from work and all responsibility for performing work, regardless of whether such work is performed at one of the company's places of business or elsewhere.

## II. PROHIBITIONS:

A. **The manufacture, distribution, dispensation, possession and use of, or having in your bodily system, legal and illegal drugs while on working time or on SKILS'KIN premises is prohibited.** Prescription or nonprescription medications are not prohibited when taken in accordance with lawful prescription or consistent with standard dosage recommendations. A positive drug test is prima facie evidence of the use of drugs and having illegal drugs in your bodily system. An employee receiving a positive result will be subject to discipline, up to and including immediate termination of employment.

B. **The use of, being in consumption of, or being under the influence of alcohol while on working time or on SKILS'KIN premises is prohibited.** A positive for cause alcohol test is prima facie evidence of being under the influence of alcohol. Observations of an employee's appearance and behavior may also lead a supervisor to reasonably conclude that the employee is under the influence of alcohol. Such observations include, but are not limited to, the following examples: breath alcohol odor, swaying or staggering walk, bloodshot eyes, etc. An employee receiving a positive result will be subject to discipline, up to and including immediate termination of employment.

C. **Refusal to submit to a substance abuse test, whether for drugs or alcohol or both, including altering, adulterating, diluting or otherwise tampering with or substituting a specimen sample, is prohibited.** Where an individual is found to have refused to provide a sample; has altered, adulterated, or tampered with a sample; or fails to provide a satisfactory medical reason for the dilute state of the sample, the employee will be subject to discipline, up to and including immediate termination of employment.

D. **Prescription Drugs:** Employees may not report for work while taking prescription medications unless the employee has been assured by his or her physician that such usage will not impair the individual's ability to perform his or her job safely.

E. **Expulsion:** Any individual found in violation of this policy is subject to expulsion from company premises and/or disciplinary action, up to and including immediate termination of employment. Such violation may have other civil and criminal consequences for the individual.

### III. SUBSTANCE TESTING:

A. **Job Applicants.** All job applicants, with the exception of Montana, are required to submit to a drug test after SKILS'KIN has extended a conditional offer of employment. SKILS'KIN shall use a refusal to submit to a drug test or a positive test as a basis for not hiring the job applicant

B. **Post-Accident.** Upon the occurrence of an accident which occurs while on working time and requires medical attention beyond first aid, an employee shall make himself/herself available to proceed to the nearest specimen collection site as soon as practicable following the accident to be tested for illegal drugs and alcohol.

C. **Reasonable Suspicion (R/S) or For Cause Testing.** When a supervisor, manager or other designated company official has reasonable suspicion R/S or cause to believe that an employee is in violation of one or more prohibitions set forth in this policy, then the employee will be notified that he or she must undergo a R/S drug and/or alcohol test. The notified employee must make himself or herself immediately available to be escorted to the nearest specimen collection site.

D. **Return to Duty Testing.** Where an employee has received a positive test result, he or she must undergo a return-to-duty test and receive a negative result prior to resuming employment, if the employer, at its discretion, allows such resumption. The cost of any return to duty test shall be borne entirely by the employee.



#### **IV. COLLECTION PROCEDURE:**

A. **Required Samples:** Tests for drugs generally require a urine or oral fluid sample. Tests for Alcohol generally require a breath or oral fluid sample.

B. **Privacy:** The collection and testing procedure is designed to ensure, to the extent possible, that individual dignity and privacy are preserved. As such, collection will generally be performed in an unobserved, unobtrusive manner.

C. **Situations Leading to Observed Collection:** As noted above, generally urine samples will be collected in a manner preserving individual dignity and privacy to the greatest degree. This policy will be modified, however, where concern for sample integrity exists. Such circumstances include, but are not limited to, the existence of a previous adulterated, altered or tampered with sample; a previous attempt to adulterate, alter or tamper with a sample; a reasonable suspicion test; a previous positive result; or a measurement thought to be inconsistent with a fresh voiding. In such cases, the modified collection will include observed collection wherein the individual is accompanied by a same sex medical professional during provision of the sample.

#### **V. DISCIPLINARY ACTION:**

Violation of any portion of this policy may result in disciplinary action up to and including termination, even for the first offense.

#### **VI. REFERRAL FOR EVALUATION AND LAST CHANCE AGREEMENT:**

A. **First-time Positive Test for Alcohol or Drugs:** At its discretion, the employer may decide not to use a first-time positive test for alcohol or drugs as the basis for termination of an employee where the employee opts to participate in a last chance agreement. The last-chance agreement shall require an employee to:

1. Submit to a Substance Abuse Professional (SAP) for evaluation of dependency, and to any alcohol or drug testing recommended in conjunction with any recommended rehabilitation program. Referral shall be at the cost of the employee, to the extent such services are not covered by health insurance).
2. Comply with any treatment recommendations (treatment shall be at the cost of the employee after referral by the SAP, to the extent not covered by health insurance).
3. Be subject to follow-up drug and alcohol testing for up to two years, at a frequency of at least four times per year, unless entry into treatment was voluntary and not the result of a positive drug or alcohol test.

4. Meet the same standards of performance and conduct that are set for other employees.
  5. Authorize the employer to receive all relevant information regarding the employee's progress and treatment, if applicable.
- B. **Treatment Program:** When substance abuse treatment is necessary, employees must use treatment services approved by the employer, which shall include a continuing care component lasting for up to two years.
- C. **Treatment Facility to Monitor Employee Compliance with Treatment Recommendations:** The treatment facility or program shall monitor the employee's progress while in treatment, including the continuing care component, and notify the employer when an employee is not complying with the program's treatment recommendations.
- D. **Failure to Comply as Cause for Termination of Employment:** Failure to comply with all the terms of the last-chance agreement normally will result in termination of employment.
- E. **Other Conduct Resulting in Cause for Termination of Employment:** The employer may terminate an individual's employment for the following reasons:
1. Refusal to submit to a drug or alcohol test;
  2. A positive test result for drugs or alcohol.
  3. Refusal to agree or failure to comply with the conditions of a last-chance agreement;
  4. After a positive test for alcohol or drugs, any violation of employer rules pertaining to alcohol or drugs.
  5. Coming to work or failing to appear for work because of being under the influence of alcohol and/or drugs.
- F. **Policy does not Limit or Alter "At-Will" Employment Status.** This policy in no way limits or alters the at-will nature of employment with SKILS' KIN.
- G. **Possession, Use, Sale or Solicitation of Drugs or the Possession or Use of Alcohol in the Workplace is Strictly Prohibited:** The possession, use, sale, or solicitation of drugs in the workplace, and the possession or use of alcohol in the workplace, is prohibited, and may result in immediate termination of employment.

## **VII. VOLUNTARY SELF-REFERRAL:**

A. The Employer encourages voluntary self-referral. Employees who feel they may have a substance abuse problem are strongly encouraged to seek assistance. Employees who voluntarily acknowledge a substance abuse problem will be given an unpaid leave of absence not to exceed 30 work days in which to seek treatment.

## **VIII. CONFIDENTIALITY:**

SKILS’KIN will make all reasonable efforts to maintain confidentiality in dealing with matters involving an individual employee’s drug test, test results and employee use of an employee assistance program. Generally, only those managers, supervisors or other company designated officials such as the Chief Executive Officer who have a need to know the information will have access to the same. Release of information under other circumstances will be made only by express written authorization of the individual, entered into knowingly and voluntarily, unless release is otherwise required by law.

The employer may utilize a drug testing policy stated in the handbook, but must ensure the employees individually sign an authorization and consent to testing. A sample follows:

The undersigned employee acknowledges that he or she has received a copy of and has reviewed and understands SKILS’KIN’S Drug Free Workplace and that such employee agrees to comply in all respects with such policy. Without limiting the foregoing, employee agrees and consents to the substance testing and substance testing procedures described in such policy, and releases SKILS’KIN and its agents, contractors and employees from any claim arising from or incident to substance testing in accordance with such policy.

## **EMPLOYEE STATUS CHANGE & SEPARATION**

### ***TRANSFERS AND PROMOTIONS***

It is our desire to hire the most qualified candidate when filling vacancies or new positions within SKILS’KIN. During the selection process, preference may be given to a current employee if all other factors are relatively equal. However, because of legal requirements, levels of education and other qualifications required for some positions, promotions from within our organization are not always possible. Past performance, qualifications, abilities, job experience and potential are important factors that we consider in the selection process of employees for promotion. Where these factors are deemed to be equal among two or more qualified employees and we decide to promote from within, length of service may be a determining factor. Consideration is also given to a current employee, who is facing a possible lay off due to non-performance related factors.

Notices of open positions are posted on bulletin boards with the exception of certain top management positions. A current employee who meets the minimum qualifications for an announced position, and who is satisfactorily performing in his/ her present job, and, who has been in his/her position for a minimum of six months and is not currently on a Performance Improvement Plan may apply for the job opening by submitting a written request for transfer/promotion to the hiring manager. Management reserves the right to determine relative qualifications for a posted position or to hire from outside SKILS'KIN rather than promote from within. Pending transfers must be communicated to each manager who is affected.

Transfers may be initiated at any time by SKILS'KIN. This allows us to broaden the range of skills within the organization, meet identified needs, and, to enhance employee versatility.

### ***SEPARATION***

With the exception of Montana employees, it is understood that the employment relationship is at will and can be terminated, with or without cause, without notice, at any time by either party, regardless of the method or manner of payment of wages or salary. No employee, manager or supervisor has the right to change this relationship or to make a contract binding on the company except the CEO and then only if done in writing and signed by both parties.

Employees who have resigned their employment with proper notice or were laid off are eligible for rehire based on the same terms and conditions as other applicants.

1. **Voluntary Resignation:** If you voluntarily terminate your employment, we require that non-supervisory employees will give at least two week notice to your supervisor (management employees are expected to provide at least four weeks' written notice), stating the reason for the resignation. An employee that provides notice of their intent to voluntarily resign from their position and does not provide proper notice, risks having their employment status with SKILS'KIN be considered as "ineligible for rehire status."
2. **Layoffs:** There are certain times when it may become necessary to lay off employees as a result of changing business conditions (such as reorganization resulting in the elimination or modification of a job or changes in job functions or technology). If SKILS'KIN determines that a reduction in force becomes necessary or appropriate, we will make every reasonable effort to give you at least a two-week notice. Layoffs within each classification may be based on length of service with SKILS'KIN. Employees will not be retained unless they are capable of performing the job in question at a satisfactory level. For the purposes of this policy, length of service will be measured from an employee's last date of hire; however, any periods of absence due to a leave of absence or break in service shall be taken into consideration on a case-by-case basis.

Employees informed that they are to be laid-off may seek transfers or promotions. All layoffs are considered permanent. Laid-off employees are entitled to reemployment according to the provisions on rehiring former employees. Any employee recalled from layoff must return to work within five working days when offered reemployment.

### ***EXIT INTERVIEWS***

The Human Resources Department or a designee may try to conduct an exit interview with terminated employees. The purposes for this interview include ensuring the return of all SKILS’KIN property, reviewing financial issues, accrued vacation, reasons for the termination, layoff or resignation, and obtaining the employee's input and suggestions for improvement. You will be informed of any rights to continued benefits coverage at this time. Unless other arrangements have been made for earlier payment, your final paycheck will be available on the payday of the pay period during which your employment terminated. Wyoming employees’ final payment is made within 5 days of their termination date.

## **SAFETY AND SECURITY**

### ***SECURITY***

Security is an important concern for all employees. When leaving the premises at the conclusion of your workday, check your work area for open windows, lights left on, running machinery, coffee makers and teapots left on and other potential hazards.

### ***UNAUTHORIZED PERSONNEL***

SKILS’KIN personnel on duty should make every effort to be aware of strangers on the premises. Anyone who notices an unfamiliar or unauthorized person on the premises should contact the supervisor in charge. Off-duty employees are not to be on the premises, other than public areas except for official business or picking up paychecks on off-duty days. All visitors are required to check in at the front desk.

### ***SELLING AND SOLICITATION***

The following policies are made for the safety and security of all employees and shall be strictly enforced. The purpose of this policy is to maintain an orderly workplace, to avoid intrusion upon employees at their work and to preserve employee safety and security throughout the facility as to funds, supplies, records and confidential information. Accordingly, all employees are to observe the following rules and report violations to their supervisors:

1. No non-employee is allowed to come on to the property of SKILS’KIN to survey, petition or distribute literature to employees. This policy includes charity solicitors, salespersons, questionnaire surveyors, union organizers or any other non-charity solicitor or distributor.

2. Employees may not solicit for any purpose, at any time, in any work area during working time. Work time includes that time for which the employee is paid. Employees are allowed during non-working time and in non-working areas, including breaks and meal periods, to engage in protected speech relating to the terms and conditions of employment as authorized by both state and federal law. Employees may not distribute literature for any non-job related solicitations purpose during work time or in work areas or during non-working time or in non-work areas. All facilities, grounds, and company vehicles are considered work areas, except designated break and meal period rooms or areas.

### ***WORKPLACE VIOLENCE***

SKILS’KIN strives to provide a safe workplace for all employees. To maintain a safe workplace and reduce the risk of violence, the employer has implemented a strong workplace policy and engages in ongoing supervisory and employee training in this area. Further, hiring and employment practices have been implemented to reduce the risks of hiring those with violent histories. For example, applicant’s criminal histories and references are reviewed prior to employment. The employer also conducts annual inspections of SKILS’KIN premises to evaluate workplace hazards, such as vulnerability to workplace violence. Reasonable corrective steps will be taken to remedy any such concerns.

SKILS’KIN does not and will not tolerate any violence or threatened violence against any of our employees, or any other persons on our premises by anyone, including members of the public and/or family, friends, or acquaintances of an employee. The employer prohibits acts of violence on or about employer premises or while carrying out work related activities.

Prohibited Acts: Acts of violence include, but are not limited to, the following behaviors:

- Physically harming another individual;
- Fighting with another individual;
- Pushing or shoving another individual;
- Striking at another individual;
- Intimidating or coercing another individual;
- Harassing another individual in person or by telephonic, electronic or other means;
- Stalking another individual in person or by telephonic, electronic or other means;
- Threatening another individual in person or by telephonic, electronic or other means; and
- Possessing any type of weapon on SKILS’KIN premises, including parking lots.

Warning Signs: The employer does not expect employees to be skilled at identifying potentially dangerous persons or situations. Employees are expected to exercise good judgment and to inform their supervisor or the Human Resources Department if the actions of others may be a sign of impending violence. Behaviors that may indicate a likelihood of violence include, but are not limited to, the following:

- Verbal, nonverbal, or written threats or intimidation;
- Irrational beliefs and ideas;
- Fascination with weaponry and/or acts of violence;
- Expressions of a plan to hurt oneself or others;
- Externalization of blame;
- Unreciprocated romantic obsession;
- Fear among co-workers/clients;
- Drastic change in belief systems;
- Displays of unwarranted anger;
- New or increased source of stress at home or work;
- Inability to take criticism;
- Feelings of being victimized;
- Intoxication from alcohol or other substances;
- Expressions of hopelessness or heightened anxiety;
- Violence toward inanimate objects;
- Stealing or sabotaging projects or equipment; and
- Lack of concern for the safety of others.

Any employee confronting an individual who may be armed and/or dangerous SHOULD NOT attempt to disarm or challenge the individual. Emergency procedures should be followed in order to obtain assistance.

**Reporting:** Any employee having been subject to or having witnessed violent behavior or who has identified the warning signs of violence should immediately contact his or her program director or if not available, the Human Resources Director to report concerns. This report may be made, orally or in writing, regardless of the relationship between the reporting individual and any involved parties. Reports may be made anonymously. All reports will be promptly investigated and kept confidential to the extent possible.

**Consequences:** At any time an employee makes threats, displays threatening behavior, commits violent acts or carries out acts of harassment or stalking on this organization's premises, he or she shall be removed from premises as quickly as safety permits and receive disciplinary action sufficient to eliminate any further prohibited activity, up to and including immediate termination of employment. These consequences will also apply to cases in which employees use or have used company resources, such as telephones, copiers, fax machines, computers, letterhead, social media or vehicles to carry out threats or harassment of any other person, inside or outside this organization. At any time a non-employee, such as a customer, vendor, or family member of an employee, commits an act

prohibited by this policy, the individual will be removed from premises as soon as safety permits and law enforcement will be immediately contacted. The employer will ensure such individual commits no further prohibited acts and may suspend or terminate any business relationship with the individual responsible for the prohibited conduct.

The employer will respond to the unacceptable behavior based on the needs of the affected employees and in a manner that protects all employees and eliminates the threat of further such acts, to the extent possible. Thus, in addition to removal, discipline, and termination of employment or business relationship, the employer may also execute a no trespass letter addressed to the violent, threatening, or harassing individual, assist the affected individuals in receiving restraining orders protecting the workplace, alter affected employees' work schedule or provide him or her with needed time off, refer the employee to community resources and local domestic violence services.

**Reporting Restraining Orders:** We require that all employees who obtain protective or restraining orders list the employer's location as a protected area, provide the Human Resources Director with a copy of the order granted, even if the order is temporary. We prefer to keep a certified copy of the order and will provide for the costs of certification. Further, the employer will work with the employee to fill out a trespasser information sheet so that others may identify the individual restrained. These steps will allow the employer to assist law enforcement and to create a safer workplace for the affected employee, his or her co-workers, and the public SKILS'KIN serves. We understand the sensitivity of the information requested and all information will be treated with discretion. The employer will release this information only to those having a need to know it. Failure to report a protective or restraining order may result in danger to co-workers and members of the public and may result in disciplinary action, up to and including immediate termination of employment.

**Leave:** Should the employee need time off in order to obtain an order of protection, seek medical treatment, or locate safe shelter, the employer may provide reasonable unpaid leave as needed. The employee may utilize available vacation or sick leave benefits during this time. The employer can also provide information regarding community resources in relation to intimate partner violence, harassment and stalking. For discussion of these matters, please contact the Human Resources Director. (See also policy on Washington State Domestic Violence Leave.)

**Law Enforcement Assistance:** Finally, many violent actions, such as assault, battery, and domestic/intimate partner violence, constitute criminal activities. In such cases, this organization will take all steps necessary to ensure that arrest and prosecution occurs.



## ***SAFETY, ACCIDENTS AND ACCIDENT REPORTS***

### **1. BASIC REPORTS**

**SKILS’KIN requires that you cooperate in helping to promote safety and to prevent accidents to yourself as well as to other employees, customers and visitors by observing all applicable state and federal regulations and all company rules. Please refer to our separate safety materials, such as our safety manual and accident prevention program for more specific information.**

- a. Promptly report all unsafe or potentially hazardous conditions to your supervisor.
- b. Learn the posted fire rules, the location of fire alarm boxes, fire extinguishers, escape routes and your own duties in case of fire.
- c. Keep individual work areas clean and orderly.
- d. Do not operate electrical equipment with wet hands.
- e. Store all materials and equipment in their proper areas.
- f. If your job requires protective clothing or equipment, always use it as required.
- g. Do not engage in horseplay.
- h. Drive safely and courteously when operating vehicles.
- i. Do not smoke or permit others to smoke in SKILS’KIN facilities or company vehicles. Smoking on SKILS’KIN property is permitted only in areas designated as (“Smoking” areas).
- j. When lifting heavy objects, follow the proper procedures and use the appropriate number of persons to assist you.

### **2. SAFETY ORIENTATION AND TRAINING**

We also provide specialized safety orientation and training for certain jobs. Attendance is mandatory so that you will be familiar with all safety rules and procedures that are unique to your job and work area.

### **3. ACCIDENTS**

If you should sustain an injury while on the job, you are required to notify the nearest available supervisor immediately. The supervisor will arrange any appropriate first aid, and/or arrange for transportation to obtain appropriate medical attention if necessary. Late reporting of an injury while on the job may be cause for discipline up to and including termination.

## **BENEFITS**

### ***GROUP INSURANCE PROGRAMS***

You may be eligible to participate in certain insurance programs. Programs vary according to your job classification and will be explained during your orientation training. If your classification changes you should discuss possible impact on insurance program availability with the Benefits Coordinator. Any questions that you have regarding group insurance plans should be addressed to the Benefits Coordinator. SKILS'KIN intends to continue the programs indefinitely, but reserves the right to change or discontinue these plans at any time. Participants will be notified of any changes. Participants will receive instruction on converting group insurance to individual policies whenever conversion privileges apply. Please remember that the actual benefits provided and eligibility requirements are determined by the plan documents.

**ACA.** The federal Affordable Care Act (ACA) requires that all individuals must have health coverage as of 1/1/2014. Questions regarding compliance with this law may be addressed to the Benefits Coordinator.

**COBRA.** Federal law requires us to allow employees to continue on the medical plan for 18 months following voluntary or involuntary termination of employment for reasons other than gross misconduct, or spouses or dependents to continue coverage for up to 36 months following a divorce or legal separation of the covered employee.

### ***HOLIDAYS***

SKILS'KIN observes the following days as paid holidays:

| <b>Non SCA Employees</b>  | <b>SCA Employees</b>      |
|---------------------------|---------------------------|
| New Year's Day            | New Year's Day            |
| Martin Luther King Day    | Martin Luther King Day    |
| Presidents' Day           | Presidents' Day           |
| Memorial Day              | Memorial Day              |
| Independence Day (July 4) | Independence Day (July 4) |
| Labor Day                 | Labor Day                 |
| Veterans' Day             | Veterans' Day             |
| Thanksgiving Day          | Columbus Day              |
| Day After Thanksgiving    | Thanksgiving Day          |
| Christmas Day             | Christmas Day             |

If any holiday falls on a Saturday or Sunday, SKILS'KIN will determine whether the observed holiday will be on Friday or Monday. For employees working under the Service Contract Act, the requirements of the coordinating body (i.e. Federal or Department of Defense) will be followed.

SCA employees are paid for the holiday if they are in a pay status during the week of the holiday per the SCA regulations.

For non-SCA employees\*, holiday pay will not be paid out if you are on any type of unpaid leave before and after any of the above listed holidays. Part time, temporary and on-call workers are not eligible for holiday pay. Full time employees receive 8 hours of holiday and half time employees receive 4 hours of holiday pay, regardless of scheduled hours for that holiday.

\*CLS employees, please refer to your specific department’s holiday structure.

**VACATION**

**Eligibility:** For non-SCA employees, \* vacation begins accruing on the employee’s first day of work, however, vacation benefits cannot be used during the first three months of employment. Vacation hours stop accruing at the beginning of the pay period in which the termination occurs. Vacation hours must be accrued to be used (no advanced leave). Vacation leave is not accrued during non-work periods such as unpaid leaves of absence. Employees working under the Federal Service Contract Act are paid vacation in accordance with the terms, conditions and requirements of the contract.

**Scheduling:** The scheduling of vacation leave must be approved and scheduled by the employee's supervisor and depends upon the work load. When possible your leave will be scheduled at the time requested by you, but management’s need to ensure proper service and production coverage will prevail. Leave requests made ahead of time are more likely to be honored, however, if a conflict occurs between two employees in scheduling annual leave, the employee who requested the time off first or is most senior may take preference so long as management determines that proper service and production levels can be met. For Exempt Employees, the minimum amount of annual leave that will be scheduled is one (1) day. **Vacation leave is important to each employee's rest and relaxation.** Each employee is strongly encouraged to utilize their accrued vacation during the course of each year. Further questions regarding the usage of vacation should be directed to your manager or the Human Resources Department.

\*CLS employees, please refer to your specific department’s PTO benefit structure.

**Non-SCA Vacation Accrual Rates**  
**Yearly Accrual**

| Years of Continuous Service | Full Time Exempt |       | Full Time Non-Exempt |      | Half Time |      |
|-----------------------------|------------------|-------|----------------------|------|-----------|------|
|                             | Hours            | Days* | Hours                | Days | Hours     | Days |
| 0-2 years                   | 104              | 13    | 80                   | 10   | 40        | 5    |
| 2+ - 5 years                | 140              | 17.5  | 116                  | 14.5 | 58        | 7.25 |
| 5+                          | 176              | 22    | 152                  | 19   | 76        | 9.5  |

**Hours Accrued Each Pay Period**

| Years of Continuous Service | Full Time Exempt Hours | Full Time Non-Exempt Hours | Half Time Hours |
|-----------------------------|------------------------|----------------------------|-----------------|
| 0-2 years                   | 4.0                    | 3.08                       | 1.54            |
| 2+ - 5 years                | 5.38                   | 4.46                       | 2.23            |
| 5+                          | 6.77                   | 5.85                       | 2.92            |

\*Days are assumed on an eight hour day.

## SCA Vacation Accrual Rates

| Anniversary Dates | Full Time Year-Around |       |
|-------------------|-----------------------|-------|
|                   | Hours                 | Days* |
| 1-4 years         | 80                    | 10    |
| 5-14 years        | 120                   | 15    |
| 15+               | 160                   | 20    |

\*Days are assumed on an eight hour day.

Employees under the SCA contract that work half-time or less, including seasonal workers, accrue vacation based on a formula set in the SCA contract. Please contact your supervisor.

**Benefit Accumulation:** The maximum amount of vacation leave that can be accumulated is 6 weeks (240 hours) for full-time employees and 3 weeks (120 hours) for half-time employees. Additional leave accruals will cease until the balance decreases below the accrual maximum. It is the employee's responsibility to monitor his/her leave balance.

**Payment upon Termination:** After completion of one full year of employment, upon termination, full time non-SCA employees will be paid for vacation balances not to exceed 80 hours. Half-time non-SCA employees will be paid for balances not to exceed 40 hours after completion of one full year of employment. SCA employees will be paid out their earned vacation hour balance upon termination.

### ***SICK LEAVE***

Employees working under the Federal Service Contract Act do not have sick leave per their contracts. The statements below only apply to non-SCA employees.\*

\*CLS employees, please refer to your specific department's PTO benefit structure.

If you miss work because of an illness or other valid reason, you may be allowed to take sick leave (if you have no sick leave hours available, vacation may be used) to cover

payment for lost work hours and to care for sick family members. Absence due to illness may require written confirmation by a doctor's certificate at the time you return to work or earlier, at the discretion of SKILS'KIN. Your accumulated reserve of earned leave may be used for the following situations only:

1. Personal illness; or
2. Personal temporary medical disability (e.g. associated with pregnancy or childbirth); or
3. Health condition of a child under the age of 18 that requires treatment or supervision; or
4. Adult children incapable of self-care because of a physical or mental disability; or
5. Serious health or emergency condition of a spouse, domestic partner, parent, parent-in-law, or grandparent; or
6. Approved Family Medical Leave.

Sick leave is accumulated on the employees start date. Full-time employees accrue sick leave benefits at the rate of 1.85 hours per pay period. Half-time employees accrue sick leave benefits at the rate of .92 hours per pay period. Employees do not accrue sick leave benefits during non-work time such as unpaid leave of absence. Unused sick leave hours are carried over from year to year. Unused sick leave benefits are not paid out upon termination of employment.

**Use of Benefit for Family Care:** Where an employee has accumulated sick leave available, this benefit may be used for family care as noted above. Once the employee has exhausted their sick leave balance, the employee can then utilize their vacation balance. An employee may not take advances on this benefit.

Any employee deemed to have abused sick leave privileges by falsification, misrepresentation, or excessive use may be subject to disciplinary action up to and including immediate termination.

### ***BEREAVEMENT LEAVE***

In case of a death in your immediate family, you may receive up to three scheduled shifts paid leave, during a calendar year. In the event of the death of a member of your immediate family that is more than 500 miles from the workplace, you may take extra days as needed, using your vacation or sick time as appropriate. This time off is intended to be used to attend memorial services as well as to attend to associated family matters. Immediate family includes your spouse, domestic partner, children, step-children, siblings, parents, aunts, uncles, parents-in-law, grandparents or grandchildren. This does not apply to on-call or temporary employees.

### ***JURY DUTY***

Serving on a jury is a fundamental responsibility of citizenship and, unless business

necessity requires it, SKILS’KIN will not ask you to be excused from or postpone jury duty. If you are serving on a jury, you will be paid, up to a maximum of 10 days, the current rate of pay for your time on jury duty with the expectation that you will remit the pay you receive from the courts minus your mileage reimbursement to our front desk where it will be logged and a receipt will be provided. You are expected to work your regular work schedule on days when court is not in session and work the remaining part of your scheduled shift if you are excused from court for 4 hours or longer. In order to be entitled to jury duty leave and pay, you must present to the Human Resource Department within one week of receipt, your summons for duty and a letter or check stub from the Court Clerk showing evidence of jury duty pay and time served.

Under state or federal law, SKILS’KIN must continue to pay the salary of exempt employees while they are on jury duty or in attendance as a witness where the exempt employee’s absence is for less than a full workweek. If the exempt employee is absent for the entire workweek, then SKILS’KIN need not pay salary for that week, except as set forth herein.

### ***FAMILY OR MEDICAL LEAVE***

As provided by the 1993 Family and Medical Leave Act (FMLA) and the 2008 Amendment to the FMLA, employers with at least 50 employees will be covered by the terms of the FMLA. An employee will be covered where he or she is employed in a location with at least fifty (50) employees with-in seventy-five (75) miles; he or she has worked at least 1,250 hours in the past twelve (12) months of employment; and has worked for the employer for at least twelve months, not necessarily consecutive. FMLA requires covered employers to provide up to 12 weeks of unpaid, job protected leave in a 12 month period to “eligible” employees for certain family and/or medical reasons, in most qualifying situations, and 26 weeks in a 12 month period to “eligible” employees for caregiver leave for an injured service member.

Employees are eligible:

For the birth of a son or daughter, or to care for and bond with a newborn child;

For placement with the employee of a son or daughter for adoption or foster care and to care for and bond with the child after placement;

To care for the employee’s spouse, son, daughter, or parent with a serious health condition;

To care for an adult child with a disability;

Because of a serious health condition that makes the employee unable to perform the functions of the employee’s job;

To care for the employee’s spouse, son, daughter, parent, or nearest blood relative who is a member of the Armed Forces who suffers injury or illness while on active duty; and

Because of a “qualified exigency” that required the employee to take leave due to a spouse, son, daughter, or parent being on active duty or having been notified of an impending call or order to active duty in the Armed Forces.

A “rolling” 12 month period measured backward from the date an employee uses any FMLA leave is the method SKILS’KIN uses for calculating leave eligibility. Employees will receive 60 days written notice of any change in the method for calculating leave eligibility. If the employee has accrued paid leave, e.g., vacation, sick, or PTO leave, the employee must use paid leave first and take the remainder of the 12 weeks, if any, as unpaid leave.

FMLA leave may begin before the actual date of the birth of a child. An expectant mother may take FMLA leave pursuant to the Pregnancy Disability Leave Section below before the birth of the child for prenatal care or if her condition makes her unable to work. A pregnant employee may take leave intermittently for prenatal examinations or for her own condition, such as for periods of severe morning sickness. Likewise, leave may be taken prior to the actual date of placement for adoption or foster care in order to attend to the necessary details of completing the placement. Washington’s State Family Leave laws provide greater and additional rights to leave for pregnant employees beyond the 12 weeks of leave provided for under FMLA during the actual period of disability associated with pregnancy or childbirth.

FMLA is available on the same terms for men and women. Such leave may be taken, where appropriate, in a lump sum amount, on an intermittent or reduced leave schedule for the birth or adoption of a child or placement of a foster child with prior approval from SKILS’KIN or on an intermittent or reduced leave schedule to care for a family member with a serious health condition upon a doctor’s certification of medical necessity. Employees needing intermittent FMLA leave or leave on a reduced leave schedule must attempt to schedule their leave so as to not disrupt SKILS’KIN’S operations. Additionally, where the need for intermittent leave is planned SKILS’KIN may assign the employee to an alternative position with equivalent pay and benefits that better accommodates the employee’s intermittent or reduced leave schedule.

Where husband and wife are employed by SKILS’KIN, eligibility for FMLA leave is limited to a combined total of 12 weeks of leave during any 12 month period if the leave is taken:

For the birth of the employee’s son or daughter or to care for and bond with the child after birth; for placement of a son or daughter with the employee for adoption or foster care, or to care for and bond with the child after placement; or to care for the employee’s parent with a serious health condition.

This means that the 12 weeks maximum applies to couples, rather than individual employees, when both members of a married couple work for SKILS’KIN and the leave is taken for one or more of the 3 reasons set forth above.

If one spouse is ineligible for FMLA leave, the other spouse would be entitled to a full 12 weeks of FMLA leave. Where a husband and wife both use a portion of the total 12 weeks of FMLA leave entitlement for one of the purposes set forth above, the husband and wife would each be entitled to the difference between the amount he or she has taken individually and 12 weeks for FMLA leave for a purpose other than those set forth above.

**Example:** If each spouse took 6 weeks of leave to care for a healthy, newborn child, each could use an additional 6 weeks due to his or her own serious health condition or to care for a child or parent with a serious health condition.

An employee must provide at least 30 days' advance notice before FMLA leave is to begin if the need for the leave is foreseeable based on an expected birth, placement for adoption or foster care, or planned medical treatment for a serious health condition of the employee or of a family member. If 30 days' notice is not practicable, such as because of lack of knowledge or approximately when leave will be required to begin, a change in circumstances, or a medical emergency, notice must be given as soon as practicable. Employees, who request leave for their own or a family member's serious health condition, must provide medical certification of the serious health condition. Medical certification is also required indicating that the employee is needed to care for the family member. When the leave is for an employee's own serious health condition, medical certification is required stating that the employee is unable to perform the essential functions of the employee's job. Furthermore, prior to returning to work following leave due to the employee's own serious health condition, the employee must submit a medical fitness for duty certification indicating the employee's ability to work or, if limitations are imposed, specifying such limitations.

Leave for the birth or the placement for adoption or foster care must conclude within 12 months of the birth or placement.

For purposes of confirmation of family relationship, the employee giving notice of a need for leave may be required to provide reasonable documentation or statement of family relationship. This documentation may take the form of a simple statement from the employee, or a child's birth certificate, a court document, etc., as SKILS'KIN deems appropriate.

While an employee is on leave, SKILS'KIN will continue the employee's health benefits during the leave, at the same level and under the same conditions of payment as if the employee continued to work. Any planned changes, (e.g., in coverage, premiums, deductibles, etc.) which apply to all employees of the workforce would also apply to an employee on FMLA leave.

If an employee fails to return to work after the employee's FMLA leave entitlement has been exhausted or expired, the employee will be required to reimburse SKILS'KIN for any portion of the employee's premium paid during the leave. However, when an employee fails to return to work because of a continuation, or occurrence or onset of a serious health



condition, the employee will not be required to reimburse SKILS'KIN for premium payments made.

**Payment during FMLA Leave:**

If the employee has accrued paid leave, the employee must use paid leave first and take the remainder of the 12 weeks as unpaid leave. Vacation, sick, or PTO leave will be taken for the birth of a son or daughter, or to care for and bond with a newborn child; for placement with the employee of a son or daughter for adoption or foster care and to care and bond with the child after placement; to care for the employee's spouse, son, daughter, or parent with a serious health condition; because of a serious health condition that makes the employee unable to perform the functions of the employee's job; to care for the employee's spouse, son daughter, parent or nearest blood relative who is a member of the Armed Forces who suffers injury or illness while on active duty; and, because of a "qualified exigency" that required the employee to take leave due to a spouse, son, daughter, or parent being on active duty or having been notified of an impending call to order or active duty in the Armed Forces., Once an employee's paid leave is exhausted, any additional leave under FMLA will be taken as unpaid.

Vacation and sick leave benefits continue to accrue during an employee's vacation time as well as during any paid leave of absence. Vacation and sick leave benefits do not accrue during the unpaid period of any leave of absence.

Holiday pay will not be granted for holidays which occur during the leave of absence.

***STATE FAMILY CARE AND LEAVE PROVISIONS***

For those employees working in Washington State, Washington State's Family Care Act requires employers to allow employees to use accrued vacation, sick or PTO to care for sick family members. Family members include the following: (1) Children under 18 with a health condition that requires treatment or supervision; (2) a spouse, parent, parent-in-law, or grandparent with a serious health condition or an emergency condition; and (3) adult children incapable of self-care because of a physical or mental disability.

A health condition that requires treatment or supervision encompasses routine illnesses and preventative care, while a serious health condition means an illness, injury, impairment, or physical or mental condition that involves any period of incapacity or treatment connected with inpatient care (i.e., an overnight stay) in a hospital, hospice, or residential medical care facility, and any period of incapacity or subsequent treatment or recovery in connection with such inpatient care; or that involves continuing treatment by or under the supervision of a health care provider or a provider of health care services and which includes any period of incapacity (i.e., inability to work, attend school or perform other regular daily activities).

***PREGNANCY DISABILITY LEAVE***

Employees will be granted leave for absences associated with pregnancy or childbirth. A

pregnant employee may work as long as and return as soon as, her doctor states she may work. Following delivery, the employee must have a written authorization from her physician stating she is able to resume working. An employee on pregnancy disability leave is required to first use available paid vacation leave, sick leave or other PTO. Any additional leave required, if any, will be unpaid. Pregnancy disability leave will be allowed as follows: (1) for time off prior to delivery requested in conjunction with a doctor's statement indicating inability to work; and for time off following delivery not to exceed six (6) weeks unless additional time is requested and supported with a doctor's statement indicating inability to work.

Employer will coordinate with employee to determine beginning and ending dates of the period of time the employee is sick or temporarily disabled, i.e., unable to work because of pregnancy or childbirth. Leave in excess of six (6) weeks following childbirth will be granted only when the period of actual disability (inability to work) relating to childbirth extends beyond six (6) weeks. In that case, leave will continue until the end of the actual period of disability. If the employee returns to active, full-time employment at the end of the six (6) weeks of leave, or at the end of the actual period of disability relating to childbirth, if that extends beyond six (6) weeks, the employee will be permitted to return to the same job or a similar job at the same rate of pay and benefits. Business necessity may require departure from this policy. If the employee elects leave for longer than the actual period of disability, the employee's return to employment will be at SKILS'KIN'S sole discretion.

We ask that pregnant employees provide notice of their anticipated leave requirements as soon as they are able to do so by contacting Human Resources to discuss leave needs. This allows the employee's department to engage in advance planning regarding the employee's need for time away and a smooth transition back into the workplace upon completion of the leave.

### ***MILITARY LEAVE OF ABSENCE***

In general, service members must provide advance written or verbal notice to their employers for all military duty unless giving notice is impossible, unreasonable, or precluded by military necessity.

Employees required to attend annual military reserve training or other short-term active military duty may take the time as either regular vacation or unpaid leave. Reserves are entitled to return to their jobs as provided by federal and state law. For military service of less than thirty-one days, health care coverage continues as if the service member had remained employed.

An employee who enters the state or federal armed services for an extended tour of duty is eligible for an extended military leave of absence, which may continue up to five years. Employees may (but are not required to) receive all accrued vacation pay as soon as their extended military leave begins. An employee who leaves work to serve in the military is

entitled to re-employment consistent with relevant state and federal laws. Such employees are required to report to work within the time frames set forth by applicable federal and state law. For more information, please see the poster regarding USERRA located on company information boards. Individuals performing military duty of more than 30 days may elect to continue employer sponsored healthcare for up to eighteen months. Such employees may be required to pay up to one hundred and two percent of the full premium. All pension plans are protected.

The Washington State Military Leave Act allows spouses of military personnel who work 20 or more hours per week, to take up to 15 days unpaid leave while their spouse is on leave from deployment, or before and up to deployment. Leave is unpaid, but employees may elect to substitute accrued paid time off if available. Upon return from leave, employees must be returned to the same or an equivalent position with respect to pay, benefits, and other terms and conditions of employment. Leave is available only during times of military conflict declared by the President or Congress.

An eligible employee who wants to take a military leave related to the deployment of a family member must notify his or her supervisor in writing within five (5) business days of receiving a spouse's notice of an impending call to duty, an order to active duty, or a leave from deployment. Employees may be required to provide a copy of a spouse's military orders upon request by their supervisor.

### ***DOMESTIC VIOLENCE LEAVE***

The Washington State Domestic Violence Leave Law allows victims of domestic violence, sexual assault, or stalking to take leave from work, paid or unpaid, to take care of legal or law enforcement needs and obtain healthcare. Family members of the victim may also take reasonable leave to help the victim obtain treatment or seek help.

Victims of domestic violence, sexual assault, and stalking may take reasonable leave, intermittent leave, or leave on a reduced leave schedule to: (1) seek legal or law enforcement assistance or remedies to ensure the health and safety of the employee or employee's family members, which may include preparing for or participating in any civil or criminal legal proceeding related to or because of domestic violence, sexual assault, or stalking; (2) seek treatment by a healthcare provider for physical or mental injuries caused by domestic violence, sexual assault, or stalking, or to attend to healthcare treatment for a victim who is the employee's family member; (3) obtain or assist a family member in obtaining services from a domestic violence shelter, rape crisis center, or other social services programs; (4) obtain or assist a family member in obtaining mental health counseling related to an incident of domestic violence, sexual assault, or stalking, in which the employee or the employee's family member was a victim of domestic violence, sexual assault, or stalking; (5) participate in safety planning, temporarily or permanently relocate, take other actions to increase the safety of the employee or employee's family members from future domestic violence, sexual assault, or stalking.

A family member is defined to include an employee's child, spouse, parent, parent-in-law, grandparent, or a person with whom the employee has a dating relationship. An employee may demonstrate a family relationship by providing a birth certificate, court document, or other similar record, or by a statement from the employee seeking leave. Domestic violence is not limited to violence between spouses or intimate partners. The term encompasses physical harm or the infliction of fear of physical harm between the family and household members, such as adult persons related by blood or marriage, or persons with a biological or legal parent-child relationship.

Employees who take Domestic Violence leave will be returned to the position held prior to taking leave, or a position with equivalent benefits, pay, and other terms and conditions of employment, and in a workplace within twenty (20) miles of the employee's previous worksite.

The employee's coverage under any health insurance plan will be maintained during the duration of the leave at the level and under the conditions coverage would have been provided if the employee had not taken the leave.

Employees who request Domestic Violence leave must provide five (5) days advance notice in writing. If the employee cannot give five days advance notice because of an emergency or unforeseen circumstances due to domestic violence, sexual assault, or stalking, the employee or employee's designee must give notice by the end of the first day of leave.

In regards to an employee's request for leave, SKILS'KIN may ask the employee to verify his/her need for leave by providing any of the following: (1) a police report indicating the employee or employee's family member was a victim; (2) court order providing protection to the victim; (3) documentation from an advocate for victims of domestic violence, clergy, attorney, or healthcare provider; or (4) an employee's written statement that the employee or employee's family member is a victim and needs assistance.

All information provided by the employee when requesting leave will be kept confidential, including the fact that the employee or employee's family member is a victim of domestic violence, sexual assault, or stalking, or that the employee has requested or obtained leave.

### ***OTHER LEAVE***

Employees may request personal leave of absence. These types of leaves that fall outside of the above types of leave may be granted on a case by case basis. If you are taking personal leave, vacation or PTO may be used.

### ***OTHER BENEFITS***

This section is provided to let you know that SKILS'KIN makes contributions on your behalf to the Social Security Administration in addition to those each employee makes

through the FICA payroll deductions. Unemployment compensation benefits are generally available after termination to employees who become unemployed through no fault of their own.

## **ETHICS POLICY AND RESPONSIBILITIES**

### ***INTRODUCTION***

- 1.1. The trust and respect of all—fellow workers, customers, elected officials, suppliers, competitors, neighbors, friends, and the public—are assets that must be earned every day. Therefore, it is the policy of SKILS’KIN to conduct its business affairs in an ethical and proper manner. Any conduct that may question our honesty, integrity, or impartiality or any activity that could cause embarrassment to SKILS’KIN or damage its reputation is prohibited. The pursuit of goals, sales, billings or clients will not distort our ethical standards. Self-interests and personal desires will not interfere with teamwork or fairness.
- 1.2. Regardless of one's position at SKILS’KIN, ethics and integrity are critical in all processes. Particular care must be observed when:
  - A. Reporting information
  - B. Using SKILS’KIN’S resources
  - C. Interacting with consumers, suppliers, and competitors
  - D. Confronting a difficult deadline, goal, expectation, or decision.
- 1.3. The ultimate measure of integrity is the degree to which the needs of customers are reliably and consistently satisfied. Therefore, SKILS’KIN is committed to developing, manufacturing, and delivering quality products and services which, in all respects, meet individual planning goals, contractual obligations and quality standards. Accordingly, it is the responsibility of each employee to respond promptly and positively to any complaints concerning our products or services.
- 1.4. The following policies and responsibilities summarize SKILS’KIN standards of conduct. These policies and responsibilities guide ethical decisions in situations that may suddenly and unexpectedly arise. Due to the pace and complexity of modern business activity, situations which are clearly “right” or clearly “wrong” seldom occur. Analyzing problems and exploring solutions often present ethical dilemmas. While a real effort has been made to cover the ethical questions that might surface, no set of policies or procedures can begin to cover every situation.

### ***ILLEGAL & UNETHICAL ACTS***

- 2.1. This policy specifically forbids the following unethical or illegal acts by employees. This applies whether or not the action is a criminal act, subject to prosecution:

- 2.2. Employee theft, fraud, embezzlement, misappropriation, or any form of wrongful conversion of property belonging to SKILS’KIN, its customers, the persons served, or other employees.
- 2.3. Any act of fraud or deception involving SKILS’KIN, its customers, the persons served or other employees, or any other party. Example: billing for job coaching services not delivered.
- 2.4. Any act of bribery, including a promise, offer, or gift of money or anything of value made or offered by an employee to:
  - A. A government official or someone acting for the government;
  - B. A person employed by, or acting on behalf of, a customer, supplier, or other organization with which SKILS’KIN does business or has prospective business.
  - C. Destruction, manipulation, or alteration of records in order to falsify, conceal, or misrepresent information;
  - D. Avoid criticism for errors of judgment or for failure to follow instructions;
  - E. Show a performance record to be better than or different from actual performance achieved.
- 2.5. Paper forms and reports often track accountability. Therefore, the accurate and timely processing of all manner of “paperwork,” including client training reports, case notes, time cards and requests for personal (employment related) employee information is essential. Employees who falsify records will be subject to immediate termination.
- 2.6. Any employee, who is convicted or arrested for any crime or illegal act during their SKILS’KIN employment, must report this information to their immediate supervisor or manager. SKILS’KIN may then conduct an investigation in regards to the findings of this issue and then may issue a decision on the employee’s continued employment with the organization. Failure to report this type of information to SKILS’KIN could lead to immediate termination of SKILS’KIN employment.

### ***CONFLICTS OF INTEREST***

- 3.1. All employees should avoid situations that might cause their interests to conflict with those of SKILS’KIN or might compromise the agencies integrity and reputation. A conflict, or the appearance of a conflict, occurs when an employee or the immediate family member of an employee uses their position (or their family member’s position) at SKILS’KIN for personal benefit through an investment, association or business relationship; or when the relationship may

interfere with the employee's ability to exercise independent judgment on behalf of SKILS'KIN.

### 3.2. **Service on other Boards**

SKILS'KIN requires that all employees obtain prior approval before accepting an appointment as a member of the board of directors or as an officer of any other company, trade association, educational institution or organization similar to SKILS'KIN. This policy is not intended to prevent service to such organizations; rather its purpose is to avoid situations which could present a conflict of interest.

3.3. In the normal course of its business, SKILS'KIN engages outside professionals, such as an independent certified public accounting firm to perform statutory audits. SKILS'KIN may also engage bankers, management consultants, attorneys, advertising agencies, and other firms or individuals. The likelihood or reality of the provision of services by these firms or individuals to companies who may directly compete with SKILS'KIN must be carefully considered in order to prevent unauthorized disclosure of proprietary information.

### 3.4. **Outside Employment and other commercial interests**

Full-time employees are discouraged from accepting second jobs outside even if the second job is as self-employed. SKILS'KIN expects that no outside employment be accepted by any of its employees, which might create a conflict of interest, without prior approval of the CEO. This requirement exists solely to insure that the outside job will not create a conflict of interest or interfere with the job requirements and/or the performance of the employee at SKILS'KIN. The CEO may withhold consent if a conflict of interest is likely.

### 3.5. **Political Activities**

- A. No employee may use SKILS'KIN, or their position at SKILS'KIN, to directly or indirectly coerce, command, or advise to pay, lend or contribute anything of value to any organization or person for political purposes.
- B. No employee may become a candidate for a public or political party elective office in any partisan election that directly influences the way SKILS'KIN does business.

## ***PROPRIETARY AND OTHER CONFIDENTIAL INFORMATION***

4.1. SKILS'KIN'S proprietary information is one of its most valuable assets. Safeguarding this information helps protect the organization's interests and contributes to its ability to compete and grow. Proprietary information includes but is not limited to the following:

- A. Business contacts
- B. Research
- C. New product plans

- D. Short and long term goals, objectives and strategies
  - E. Sales or profit/loss data
  - F. Any unpublished financial or pricing information
  - G. Information regarding employee compensation
  - H. Employee, customer, and supplier lists
  - I. Detailed information regarding customer requirements, preferences, business habits, and plans
- 4.2. A special category of confidential information is the information collected and known about people served. SKILS’KIN employees are entrusted with confidences concerning clients and their families. It is every employee’s responsibility to hold this information in strictest confidence and to take the utmost care to guard individual privacy. Documents should be properly safeguarded at all times. Any requests for information about people we serve should be directed to the Human Resources Manager or to the individual’s Service Coordinator.
- 4.3. What is known about SKILS’KIN’S business and how it is conducted should remain in the office at the end of each day. Disclosure of information to even seemingly innocent persons such as spouses, friends, and coworkers has the potential to bring undue harm to business endeavors.
- 4.4. The legal obligation to protect SKILS’KIN’S proprietary and other confidential information continues even after the employment relationship ceases. Correspondence, printed matter, documents, records of any kind, policies and procedures and the ways of doing things are all property of and must remain at SKILS’KIN.

***RESTRAINT OF TRADE AND UNFAIR COMPETITION***

- 5.1 SKILS’KIN is committed to free and open competition in the marketplace. The only competitive advantages sought are those gained through superior service delivery, manufacturing, marketing and research. It is SKILS’KIN’S intention to win business through the provision of excellent products and services—certainly never through questionable, unfair, or illegal trade practices.
- 5.2. Strict adherence by all employees to the letter and spirit of the antitrust laws of the United States is absolutely required. The main objective of antitrust laws is to preserve competition by prohibiting practices such as price fixing and restrictive arrangements with competitors or customers on territories, pricing and deals. The list of prohibited activities set forth below is not intended to be exhaustive, but to serve as a general guide. Consult your supervisor prior to taking any action about which there is any question. It is SKILS’KIN’S policy that no employee shall:
- A. Agree or attempt to agree with a competitor to fix or control pricing.



- B. Agree or attempt to agree on the division of markets, territories or customers or on the boycotting of certain customers or suppliers.
  - C. Establish prices that are not competitive and do not include SKILS’KIN’S total costs in an attempt to underbid competitors.
  - D. Sell any product or service on the condition, understanding, or agreement that the customer must purchase another product from us.
  - E. Sell products or services of like grade and quality to competing customers at different prices during the same time period.
  - F. Make false or misleading remarks about other companies, their services or products.
- 5.3. It is not necessary for a formal agreement or handshake to have taken place in order for an actual or planned activity to violate guidance in this section. Responding to pressure can be sufficient. An agreement may also be inferred from actions, such as a “frown”, “wink”, or “knowing look.” Therefore, avoid contact which might infer that an agreement exists.

### ***CONTRACT PRICING AND ACCOUNTABILITY***

- 6.1. Customers have a right to expect, and SKILS’KIN has an obligation to ensure, that products and services are delivered at a fair and reasonable price. Accordingly, we will establish prices that reflect the costs, the technology involved, the difficulty of overall contract performance, market conditions, and other relevant factors.
- 6.2. Employees involved in the negotiation of contracts must ensure that all statements, communications, and representations are accurate and truthful. The submission to a customer of a proposal, quotation, or other document or statement that is false, incomplete, or misleading will be subject to immediate disciplinary action, up to and including termination.
- 6.3. In addition, it is SKILS’KIN’S policy to accurately record all costs in accordance with generally accepted accounting principles. The shifting of charges or costs to inappropriate contracts or accounts is prohibited. Each employee has the responsibility for ensuring that no charge is made to a contract, invoice or billing, that is incorrect, unallowable, or otherwise improper. An employee who is aware of any charging improprieties should report them immediately.
- 6.4. Applicable regulations will be followed which require the maintenance of books, records, and accounts that “in reasonable detail, accurately and fairly reflect the transactions and disposition of the assets” of SKILS’KIN.

### ***WHERE TO GO FOR ANSWERS***

- 7.1. All staff is encouraged to ask questions and to get advice from any of the following recommended sources:

- A. The best and most convenient source for information is your supervisor. Your supervisor is generally closest to the situation and understands how business should be conducted.
  - B. If, for any reason, your supervisor is unavailable, contact the next supervisor or any manager. Follow the chain of command. Asking coworkers or other people not directly involved may result in misinformation.
- 7.2. If there are ethical issues that you wish to discuss, you may contact the CEO or the Human Resources Director openly or anonymously. All discussions will be held in strictest confidence.

### ***REPORTING OF ABUSE OR ETHICS VIOLATIONS***

- 8.1. Any employee who knows or believes that any other employee or agent of SKILS’KIN has engaged in or is engaging in improper conduct on behalf of the Corporation, or that any product, procedure, equipment, or facility is not safe and may injure any person or damage any property, is encouraged to report such information to his or her supervisor. Employees may report such information openly or anonymously, without fear of retribution.

### ***DISCIPLINE***

- 9.1. Proper conduct is very important to SKILS’KIN. Failure to comply with the standards outlined here and in all policies referred to may result in disciplinary action, up to and including immediate dismissal. Disciplinary action may be taken for the following reasons, or for any other reason SKILS’KIN, in its sole discretion, deems appropriate:
- A. Any employee who violates this Ethics Policy or pertinent law;
  - B. Any employee who deliberately withholds relevant information concerning a violation of this Ethics Policy or pertinent law;
  - C. The supervisor of the employee to the extent that the circumstances of the violation reflect participation in the violation, or lack of due diligence;
  - D. Any supervisor or employee who retaliates, directly or indirectly or encourages others to do so against an employee who reports a violation;
  - E. Any employee who knowingly falsely accuses another employee of a violation.
  - F. Any violation determined by SKILS’KIN to have occurred relating to its policies on General Prohibition of Harassment, Sexual Harassment, Disability Harassment or Retaliation.
  - G. Any violation determined by SKILS’KIN to have occurred relating to any other policy contained in the Employee Handbook.
  - H. Any employee who is found to have violated either state or federal law.

## **CODE OF ETHICAL CONDUCT**

### ***RESPONSIBILITIES—ALL EMPLOYEES***

1.1. SKILS’KIN recognizes its employees are essential to successful performance of its mission and that its strengths lie in putting everyone’s good ideas to work. The basic virtues of kindness, courtesy, and integrity are among the elements that provide an environment conducive to mission performance and for a pleasant working environment.

#### 1.2. Employee Responsibilities to Persons with Disabilities

A. People with disabilities, their families, friends and allies teach us much about the importance and value of listening to and being guided by the very people who “experience” the services and supports that we provide. Therefore:

- All people have the right to be treated with dignity and respect.
- All people have the right to access services which allow them to achieve their highest individual potential.
- All people have the right to make their own choices and to direct their own lives.
- All people have the right to develop meaningful relationships with people they care about and who care about them.
- All people should be able to feel good about themselves and have others recognize them for what they contribute to others and to the community.
- All people have the right to be involved—to be active in the community and to do the things they enjoy.
- All people should be able to learn to do things on their own or to be supported to do things for themselves.
- All people should be able to feel safe and to enjoy good health.
- Employees must consider the individuals’ cultural/ethnic backgrounds as well as preferences.

B. All employees must:

- Ensure individual rights are recognized and protected.
- Place the needs of persons with disabilities over personal and other agency needs.
- Guard against any form of exploitation.
- Ensure that services provided are in the least restrictive and most integrated manner.
- Advocate change in existing services in a professional manner.
- Respect the confidentiality of persons served.

### 1.3. Employee Responsibilities to Customers

- A. Respect customers and treat each one objectively, honestly, and fairly.
- B. Maintain open communication.
  - Promote trust.
  - Work cooperatively and promote teamwork with all customers, with our stakeholders, people with disabilities, contractors, coworkers and other agencies.
  - Perform quality, timely, work for all customers, including other staff members and clients.

### 1.4. Employee Responsibilities to Community

- A. Promote public awareness of the rights and capabilities of citizens with disabilities.
- B. Positively reflect the agency and its goals to the community.

### 1.5. Employee Responsibilities to SKILS'KIN

- A. Follow all policies and procedures.
- B. Work safely.
  - Observe rules and procedures developed for the safe operation of machine, tools and equipment, and practice safe working methods.
  - Report all safety hazards and violations.
- C. Dress appropriately for your position and consistent with safety and health regulations.
- D. Efficiently manage one's time.
  - Keep personal telephone calls and visits to a minimum.
  - Minimize outside business or social activities while on duty.
- E. Maintain accurate information.
- F. Maintain equipment and protect property.
  - Use the greatest care when using SKILS'KIN equipment, vehicles, supplies, grounds or materials.
  - Report maintenance and repair problems to your supervisor.
  - SKILS'KIN property should only be used for agency purposes.
- G. Participate in the employee suggestion/request system. Suggestions for improvement are always appreciated.
- H. Be open to new ideas.
- I. Seek continued growth through continuing education.
- J. Maintain membership and participate in professional organizations.

## ***RESPONSIBILITIES—MANAGEMENT***

### 2.1. Management Responsibilities to Persons with Disabilities

- A. Value the individual dignity, worth and rights of people with disabilities

and maintain the highest ethical standards in representing and working with them.

- B. Promote and develop job placements that are integrated in businesses and that offer commensurate wages, benefits, and opportunity for advancement, as well as relationship building and support from non-disabled coworkers.
- C. Advocate change in federal, state and local policy in a professional manner.
- D. Base wages on prevailing wages in the community.

## 2.2. Management Responsibilities to Customers

- A. Maintain open communication and solicit input from all customers and stakeholders: people with disabilities, contractors, co-workers, other agencies, and the general public.
- B. Promote active service coordination among agencies to ensure all needs are considered.
- C. Provide quality products and services that consistently meet or exceed customer expectations.

## 2.3. Management Responsibilities to Community

- A. Develop public awareness of the rights and capabilities of citizens with disabilities.
- B. Educate the community about the agency and its mission.
- C. Responsibly manage resources.

## 2.4. Management Responsibilities to Employees

- A. Encourage initiative.
- B. Challenge individual capabilities.
- C. Create an atmosphere in which individuals can take pride in themselves and in the quality of their work.
- D. Listen to suggestions and ideas for improvement.
- E. Provide an atmosphere where employees may communicate openly and honestly without fear of reprisal.
- F. Promote professional development, continuing education and training opportunities.
- G. Promote equal opportunity and fair treatment to all employees regardless of race, color, sex, sexual orientation, religion, disability, age, national origin, veteran or marital status or family and/or caregiver responsibilities or any other status protected by law.
- H. Evaluate employee performance in a timely manner and in accordance with established procedures.

- I. Provide accurate job descriptions.
- J. Base wages on prevailing wages in the community.

***RESPONSIBILITIES—BOARD OF DIRECTORS***

- 3.1. Insure that the CEO of SKILS’KIN:
  - A. Provides services that enhance the lives of citizens with disabilities.
  - B. Promotes services which integrate adults with disabilities into the community.
  - C. Develops policies and procedures that help in achieving the mission of SKILS’KIN.
  - D. Develops and maintains quality standards.
  - E. Develops long range plans to address the unmet needs of adults with disabilities.
  - F. Maintains a strong and flexible financial structure.
- 3.2. Attend all regularly scheduled meetings of the Board of Directors and its relevant committees.
- 3.3. Actively promote SKILS’KIN within and to the community.

## ***TO BE A SUCCESSFUL EMPLOYEE***

- Know your customer - everyone has one.
- Always clarify your understanding of a job ahead of time.
- Check your own work more carefully than your supervisor.
- Eagerly seek ways to improve your work, both in quality and quantity.
- Show your belief in teamwork by:
  - *Being there on time and ready to work.*
  - *Communicate concerns to someone who can help affect the change.*
  - *Treating others with respect.*
  - *Accepting a variety of tasks for the good of the team.*
  - *Cooperating with leaders - knowing and supporting our policies.*
  - *Supporting and helping others in their work.*
  - *Being Positive - GIVE POSITIVE SUGGESTIONS.*
  - *Solving problems by asking "What is best for my customers? My client?"*

**EMPLOYEE ACKNOWLEDGMENT FORM**  
(This page and this booklet to be given to employee)

I have received and read a copy of the **SKILS’KIN** Employee Handbook, revised August, 2014. I understand that if I have any questions about the policies or procedures, I should ask the Chief Executive Officer (CEO), or their designee, or any other member of management for clarification. I further understand that **THIS EMPLOYEE HANDBOOK IS NOT AN EMPLOYMENT CONTRACT NOR DOES IT CONSTITUTE EMPLOYMENT FOR A DEFINITE TERM. RATHER, THIS HANDBOOK SETS FORTH GENERAL STATEMENTS OF POLICY AS GUIDELINES FOR EMPLOYEES OF SKILS’KIN WHICH SKILS’KIN MAY OR MAY NOT FOLLOW IN ITS SOLE DISCRETION EXCEPT AS WHERE REQUIRED BY STATE AND/OR FEDERAL LAW.**

I understand that there is no expectation of privacy regarding electronic devices that have been provided by the company. I also understand the company may monitor and intercept any and all electronic communications and any continued use is consent to this practice.

I understand that **SKILS’KIN** reserves the right to add to, delete, or otherwise modify any of the policies set forth in this Handbook at any time, without prior notice, at its sole discretion. It is my responsibility to keep current changes provided to me by the Chief Executive Officer, their designee, or any other member of management. I have been informed that this handbook supersedes any and all prior handbooks issued.

I acknowledge that **THE EMPLOYMENT RELATIONSHIP BETWEEN MYSELF AND SKILS’KIN IS AT-WILL, WHICH MEANS THAT EITHER SKILS’KIN OR I MAY TERMINATE THE EMPLOYMENT RELATIONSHIP WITH OR WITHOUT CAUSE OR REASON, WITHOUT NOTICE, AT ANY TIME.** I agree, upon termination, to return to **SKILS’KIN** any property of **SKILS’KIN** I may have in my possession or control, including the Employee Handbook. I understand that no **SKILS’KIN’S** representative other than the Chief Executive Officer, or their designee, has authority to enter into any agreement for employment for a specified period of time or to make any agreement contrary to the foregoing. Any such agreement must be in writing.

\_\_\_\_\_  
Employee’s Signature

\_\_\_\_\_  
Employee Name (printed)

\_\_\_\_\_  
Date



