



Personnel Policy Guidelines

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I. INTRODUCTION

The Snohomish County Transportation Coalition (Snotrac) is committed to fair, clearly stated and supportive relationships between the organization and its staff and volunteers. The personnel policies of Snotrac have been established in order to provide a guide to the personnel practices and to facilitate consistency of personnel decisions. It is the intention of Snotrac to administer the personnel programs in a manner that complies with applicable federal, state, and local regulations.

A positive work environment for staff and volunteers is considered essential to achieving the mission of Snotrac. The employee benefits and support systems defined in this document are intended to contribute to a productive and effective program of service delivery as well as personal and professional growth.

THIS STATEMENT OF POLICIES IS NOT INTENDED TO CREATE A “CONTRACT” BETWEEN SNOTRAC AND ANY OF ITS EMPLOYEES OR VOLUNTEERS. THESE GUIDELINES ARE SUBJECT TO CHANGE AT ANY TIME WITHOUT ANY REQUIRED NOTICE. NOTHING IN THESE GUIDELINES ARE INTENDED TO OVERRIDE OR SUPERSEDE THE “AT WILL” EMPLOYMENT RELATIONSHIP BETWEEN SNOTRAC AND EACH EMPLOYEE.

II. HIRING AND CLASSIFICATION

A. EMPLOYEE CLASSIFICATION

All employees are classified based on three aspects:

1. Regular or Temporary. Regular employees are employees hired without a specific termination date. Temporary employees are employees whose position at the time of hire is for a short term period. Terms of employment will depend on organizational needs.

In no case will a temporary position be construed as being a permanent contract; continuation of employment after the end of a temporary employment contract requires a written and signed amendment to the contract extending the term.

2. Exempt or Non-Exempt. Unless otherwise stated in the employment contract or disallowed by the federal Fair Labor Standards Act or Washington State Minimum Wage Act, all employees shall be considered as exempt from overtime wages.
3. Salaried or Hourly. Most full-time employees will be salaried and paid monthly basis, while most part-time employees will be considered hourly and paid twice per month.

B. NON-DISCRIMINATION AND AFFIRMATIVE ACTION

The policy and intent of Snotrac is to provide equal employment and volunteer opportunities for all persons regardless of race, color, religion, national origin, marital status, political affiliation, affectional orientation or gender identity, status with regard to public assistance, disability, sex, or age or any other basis prohibited by local, state or federal law.

Snotrac intends to respond affirmatively in its employment practices and volunteer opportunities. Affirmative action applies to all aspects of employment practices and volunteer opportunities including, but not limited to, recruiting, hiring, placement, promotion, demotion, transfer, training, compensation, benefits, layoff, recall, and termination. Snotrac seeks to do business with organizations that encourage equal employment opportunity.

C. RECRUITMENT PROCEDURES

Snotrac intends to recruit, hire, and place employment applicants on the basis of the applicant's relative knowledge, skills, and abilities. The decision to employ an applicant will be based solely on the individual's qualification for the particular position along with other requisite job skills. Minimum qualifications shall be specified in the job description.

D. "AT WILL" STATUS

The State of Washington is an "at will" state and Snotrac operates under this "at will" employment relationship, meaning that employment can be ended by either party at any time.

E. CRIMINAL HISTORY

Employment is contingent upon having no criminal history against minors and vulnerable adults.

Employees and volunteers of Snotrac may directly serve minors and vulnerable adults, including people with developmental and physical disabilities (see RCW 74.34.020). These activities may include providing transportation trainings, mobility navigation, and workshops. Although a job description of an employee may not specifically identify a task or activity that would necessitate an interaction with a minor or vulnerable adult, it is reasonably likely that all employees at some point in their course of employment will in fact interact with a minor or vulnerable adult. For this reason, Snotrac needs to take precautionary efforts to protect the people Snotrac serves.

All new employees and direct service volunteers of Snotrac must fill out a disclosure statement concerning conviction of any crime, including specifically any crimes against persons or any civil adjudication of exploitation, sexual assault, physical abuse, or exploitation of any minor or vulnerable person. This disclosure form will be in writing, signed by the applicant, and sworn under penalty of perjury. This form will need to be signed annually by all employees.

In addition, Snotrac will submit a background check for new employees regarding state and federal crimes. Information received from the State Patrol will only be used to make initial employment decisions. Within 10 days after receipt of the background check response, Snotrac will notify the applicant of the response and make a copy available if the applicant wants one.

The background check information will remain protected personnel data and not shared beyond the direct hiring manager and the organization's human resources manager.

F. DRIVING AND PERSONAL VEHICLES

Snotrac encourages all employees to either ride transit or a bicycle for commuting or as part of their work transportation. However, there may be occasions when employees may need to drive their own personal vehicle or a rental vehicle.

1. Snotrac will require any employee or volunteer who may reasonably be expected to drive a vehicle for work or volunteer purposes to annually sign a document: confirming they have a driver's license, identifying the make, model, and license plate of the vehicles they may drive; confirming they have insurance for the vehicles they may drive; disclosing past driving violations and collisions; confirming their vehicle is in good working order and is regularly serviced; committing to not holding a mobile phone or similar device while driving; and committing to safe driving practices, including driving at or under the speed limit at all times.
2. Snotrac may request an employee's driving record and a record of their vehicle's service and maintenance.

G. PERSONNEL RECORDS

A complete and up-to-date personnel record shall be maintained by Snotrac for each employee. It shall be open to the employee for inspection and contain no material that cannot be shared with the employee. The employee may request a copy of the personnel file or items in the file through written request.

The personnel record shall be kept strictly confidential. No information regarding an employee or from a personnel record shall be furnished to persons outside Snotrac except when specifically authorized, in writing, by the employee.

III. COMPENSATION

Compensation will be negotiated during recruitment. At the time of hire new employees will receive a letter of hire, a job description, detailed compensation and benefits description, and a copy of the personnel policy guidelines manual.

A. WORK SCHEDULE

Snotrac will attempt to establish a 40 hour weekly work schedule which is cognizant of each individual's personal commitments and the needs of the organization. Supervisors are authorized to approve flexible work schedules consistent with work objectives of the program.

B. TIMEKEEPING

Accurately recording time worked is the responsibility of every employee. Timesheets shall reflect hours worked and hours of leave taken. Timesheets will be submitted to the employee's supervisor for approval.

C. OVERTIME

Overtime work is sometimes necessary to stay on target for project deadlines, or for other operating needs. At these times, overtime will be assigned. When possible, advance notification of these mandatory overtime assignments will be provided. The nature of overtime, however, is that it sometimes is needed with little or no advance notice. Accordingly, employees must maintain flexibility in order to be available for overtime assignments in accordance with Fair Labor Standards Guidelines.

D. PAYDAYS

All salaried employees are paid monthly. Each paycheck will include earnings for work performed during the payroll period which is the calendar month. Payday is the 5th of the following month.

All hourly employees are paid twice per month. Each paycheck will include earnings for work performed during the immediately preceding period, whether it's the 1st through 15th of the month or the 16th through 28th/31st of the month. Paydays for hourly employees are five days after the periods, on the 20th and 5th of the month.

If the payday falls on a weekend or holiday, payday will be the previous workday.

If a regular payday falls during an employee's vacation, the employee's paycheck will be available upon his or her return from vacation. The employee may request that his or her paycheck be directly deposited in a local bank account, and such request will be granted if possible.

IV. EMPLOYEE BENEFITS

A. HOLIDAYS & VACATION, AND SICK TIME

1. HOLIDAYS

- a. Salaried employees shall have 11 paid floating holidays each year, approved by their supervisor.
- b. Hourly employees shall accrue up to 11 paid floating holidays each year, earned based on hours worked.
- c. The following days shall be approved by supervisors as holidays absent exigent circumstances: New Year's Day (January 1); Martin Luther King Holiday (third Monday in January); Presidents Day (third Monday in February); Memorial Day (last Monday in May); Juneteenth (June 19); Independence Day (July 4); Labor Day (first Monday in September); Indigenous People's Day (second Monday in October); Election Day (first Tuesday in November); Thanksgiving (fourth Thursday of November); Day after Thanksgiving; Christmas Eve (December 24); and Christmas Day (December 25). When a holiday falls on a Sunday, the following day shall be considered a holiday with de facto approval. When a holiday falls on a Saturday, the preceding Friday shall be considered a holiday with de facto approval. A supervisor may also grant a holiday for other cultural or personal reasons.
- d. Exempt employees will not receive additional compensation for working on a holiday. Employees on any form of unpaid leave of absence are not eligible for holiday pay.

2. VACATION

- a. Salaried Employees
 - i. Each salaried employee is provided with an annual allocation of 15 paid vacation days, accrued on a monthly basis of 10 hours per month.
 - ii. Each year of service up to 7 years, will entitle the employee to accrue an extra day of vacation. On the employee's anniversary date each year, the monthly accrual rate will be increased for each additional year of service.
 - iii. Vacation time shall roll over annually, but total accrual of vacation shall be capped at 22 days (176 hours).
 - iv. Accrued vacation time is payable upon termination of employment.
- b. Hourly Employees
 - i. Each hourly employee is provided with an hourly allocation of 10 paid vacation days, accrued on an hourly basis.
 - ii. Hourly employees do not accrue vacation at a higher rate in future years.
 - iii. Vacation time shall roll over annually, but total accrual of vacation shall be capped at 22 days (176 hours). Employees who are scheduled to work a specific number of hours per week less than 40 hours per week shall have their cap reduced proportionately.
 - iv. Accrued vacation time is not payable upon termination of employment.

3. SICK TIME

- a. For both salaried and hourly employees, sick time allocation is 12 days annually to be utilized for addressing health needs. Salaried employees shall accrue sick time on a monthly basis of 8 hours per month. Hourly employees shall accrue sick time based on hours paid.
- b. Accrued sick time shall roll over annually, but shall total accrual of sick time shall be capped at 12 days (96 hours).
- c. Accrued sick time is not payable upon termination of employment.

B. REASONABLE ACCOMMODATION

Snotrac is subject to the Americans with Disabilities Act (ADA), which prohibits discrimination against a qualified individual on the basis of disability in regard to job application procedures, hiring, advancement, or discharge of employees, employee compensation, job training, and other terms, conditions, and privileges of employment.

“Disability” in this policy is as defined by the State of Washington RCW 49.60.040 ruling 2007c317. In general, it means the presence of a documented sensory, physical or mental impairment that has substantially limiting effect upon the individual’s ability to perform his or her job, the individual’s ability to apply or be considered for a job, or the individual’s access to equal benefits, privileges, or terms or conditions of employment. A limitation is not substantial if it has only a trivial effect.

A “qualified individual with a disability” means an individual who, with or without reasonable accommodation, can perform the essential functions of the employment position that the individual holds or desires. All Snotrac job descriptions will include a description of the essential functions of each job.

“Reasonable accommodation” is a modification or adjustment to a job, the work environment, the job application process, or the way things are usually done that enables a qualified individual with a disability to perform the essential functions of the job and to enjoy an equal employment opportunity. It is an accommodation that does not impose an Undue Hardship on the operation of the business or pose a direct threat of substantial harm to the health or safety of the individual or others.

Determination of what constitutes “reasonable” must be made on a case-by-case basis and requests for accommodation will be reviewed at the time the request is made. The request form is available.

“Undue Hardship” means an action requiring significant difficulty or expense, when considered in light of the factors set forth in the ADA or other applicable laws.

C. FAMILY AND MEDICAL LEAVE

Eligible employees may be granted up to 12 weeks of unpaid leave in a 12-month period for family or medical reasons as defined by the FMLA.

The purpose of this section is to define procedures for FMLA leave requests and approval of a leave of absence, and to ensure compliance with the Family and Medical Leave Act.

Procedure & Types of Leave: In order to be eligible for FMLA leave, employees must be employed with Snotrac for a minimum of twelve months AND must have worked a minimum of 1,250 hours during the 12 month period immediately preceding the commencement of the leave.

D. LEAVE OF ABSENCE WITHOUT PAY

1. Employees taking time away from work (not covered by FMLA) must first exhaust all paid leave available before taking unpaid time off.
2. All requests for leave of absence without pay must be submitted in writing and approved in advance by the Executive Director or designee. The request should set forth the reason for the leave and its anticipated duration. All reasonable requests will be considered and will be contingent upon business needs.
3. If an employee fails to report to work at the expiration of the approved leave period, the Agency will assume the employee has resigned. Acceptance of other employment during a leave also will be considered a resignation.
4. Snotrac cannot guarantee that an employee's exact position will be available upon the employee's return from unpaid leave of absence. Before the leave begins, when the leave is approved, the terms and conditions of the leave will be recorded in writing.
5. Additional leave under either one or both of the Washington Family Leave Act and/or the Washington Pregnancy Act may also be available.

E. WORKERS' COMPENSATION INSURANCE

Snotrac provides workers' compensation insurance coverage to all employees for injury sustained in the course of employment in accordance with Washington State law.

Any employee who sustains a work-related injury or illness should inform his or her supervisor immediately and complete a written Incident Report. No matter how minor an on-the-job injury may appear, it is important it be reported immediately. This will enable an eligible employee to qualify for coverage as quickly as possible.

F. UNEMPLOYMENT COMPENSATION

Unemployment compensation insurance premiums will be paid for each employee as required by law.

G. HEALTHCARE

Full-time salaried employees will be able to elect healthcare benefits through an ICHRA program. Current employer coverage is \$400 per month, with the remaining covered by the employee. Hourly part-time employees are not eligible for healthcare benefits.

H. TRANSPORTATION

Every employee is eligible to receive an annual ORCA transit pass.

V. EMPLOYEE REIMBURSEMENT

A. EMPLOYEE EXPENSES

1. Expense Reimbursement

- a. Any and all expenses incurred for business purposes must be authorized in advance.

2. Mileage Reimbursement

- a. Any and all mileage in personal vehicles driven by employees for company purposes must be authorized in advance.
 - v. The employee must state why the trip can not be reasonably made by transit or bicycle instead of by personal vehicle.
 - vi. Carpooling shall be encouraged and may be required by the supervisor.
- b. If an employee drives a private vehicle for company use, the mileage compensation shall be at the current federal rate per mile, providing the employee maintains liability insurance on the private vehicle at a level required by the Snotrac's insurance carrier.
- c. Mileage to and from work at the beginning and end of the day is a commuting expense and is not subject to reimbursement.
- d. Mileage shall be calculated as the distance greater than the employee's standard commute distance from their home to work at 3201 Smith Ave, Everett WA 98201.
- e. Volunteers are not eligible for mileage reimbursement.

3. Smart Phones

- a. If a work phone is not provided to a salaried employee or otherwise full-time employee, the employee shall be compensated up to 50% of the employee's personal phone plan or \$50 per month, whichever is less.
- b. If a salaried employee or otherwise full-time employee conducts a significant portion of their work from home, the employee shall be compensated up to 50% of the employee's home internet service plan or \$50 per month, whichever is less.
- c. An hourly employee who works 20 hours or less per week shall be compensated a total of \$30 per month for use of their personal cell phone and home internet.

VI. TRAININGS

Snotrac prioritizes career development and leadership development of its employees and volunteers, as well as a competent workforce that can more fully understand the requirements of these policies and other organizational best practices. Snotrac may require employees to undergo the following trainings or certifications:

- **Mandatory:**
 - Timekeeping & Recordkeeping
 - Data and Document Management
 - Workplace Environment
 - Anti-Harassment
 - Code of Conduct
 - Whistleblower Policy
 - Diversity, Equity, & Inclusion
- **Dependent on Role:**
 - CPR
 - Child Abuse/Molestation Identification and Reporting
 - Domestic violence and physical abuse identification and reporting
 - Assisting clients onto paratransit vehicles
 - Equipment Management
 - Fiscal management
 - Bicycle safety
 - Anti-Phishing & Cybersecurity
 - Fiscal management
 - HIPAA compliance
 - Diversity, Equity, & Inclusion

VII. WORK ENVIRONMENT

Snotrac recognizes that a healthy work environment is essential to effective work performance. Efforts are made to produce a work environment that offers a safe and positive setting with adequate resources conducive to helping staff achieve their work goals toward the agency mission.

A. SAFETY

Safety is a high priority and efforts are made to maintain a safe work environment. Each employee is required to obey safety rules and exercise caution in all work activities. Employees must immediately report any unsafe conditions to the appropriate supervisor.

In the case of accidents resulting in injury, regardless of how insignificant the injury may appear, employees should immediately notify their supervisor and complete a written

Incident Report. Such reports are necessary to comply with applicable law and to initiate insurance and worker's compensation benefits procedure.

B. SMOKING

In keeping with Washington State law and Snotrac intent to provide a safe and healthful work environment, smoking and vaping are prohibited throughout all facilities, offices, and vehicles. In addition, employees and volunteers may not smoke or vape while interacting with clients or community members while performing Snotrac activities.

Employees who choose to smoke or vape may do so during a break or meal period in outside designated areas in compliance with any Washington State or Federal laws.

C. LACTATION

If requested, lactation space will be provided and time will be arranged during break, lunch or on a flexible schedule basis.

D. RELIGIOUS OBSERVANCE

If requested, space and time for scheduled prayer or other religious observance will be arranged.

D. USE OF EQUIPMENT

Equipment and other tools essential to accomplishing job duties is often expensive and may be difficult to replace. When using agency property, employees and volunteers are expected to exercise care, perform required maintenance, and follow all operating instructions, safety standards, and guidelines.

Employees and volunteers should notify a supervisor if any equipment, machines, tools, or other agency property appear to be damaged, defective, or in need of repair. Prompt reporting of damages, defects, and the need for repairs could prevent deterioration of the property and possible injury. Questions regarding maintenance and care of agency property should be addressed to a supervisor.

E. PERSONAL BELONGINGS

Snotrac is not responsible or liable for personal property that is lost, stolen, or damaged. The responsibility for safeguarding, replacing or repairing personal property lost, stolen, or damaged while on Snotrac premises or in a vehicle owned, leased, or rented by Snotrac is that of the individual.

F. VIOLENT ACTIONS AND WEAPONS IN THE WORKPLACE

It is the intent of Snotrac to provide a workplace for our employees that is free from violence by establishing preventative measures and holding perpetrators of violence accountable. Violent actions on company property or while on company business will not be tolerated or

ignored. Any unlawful violent actions will be prosecuted as appropriate. Snotrac takes a no-tolerance position on workplace violence.

All employees and volunteers are responsible for reporting any incident of workplace violence by notifying the supervisor and completing a written Incident Report. If the act or altercation constitutes an emergency situation (life threatening), all employees and volunteers are empowered to call 911 or the local law enforcement agency.

If the incident does not qualify as an emergency situation, the individual involved or who saw the situation must contact their immediate supervisor or other member of management as soon as possible.

In accordance with this policy, no firearms, switchblades, or knives with blades exceeding four inches are allowed on agency property or in an employee's or volunteer's possession while on agency business.

G. WEATHER POLICY

The agency remains open when it snows. Most staff can work remotely even during a weather event. If an employee was scheduled to be at the office or another location that day but cannot due to weather, the employee must call their supervisor to report the absence and continue to report their status daily. Likewise, if an employee cannot also work at home due to a power outage, the employee must provide every reasonable effort to contact their supervisor. Staff may be able to charge the missed time to paid time off if available.

VIII. ANTI-HARASSMENT

A. POLICY

Snotrac is committed to providing a work environment where all employees are treated with dignity and respect. Discrimination and harassment on the basis of an employee's race, religion, creed, color, national origin, citizenship, marital status, sex, age, sexual orientation, veteran status, or the presence of a physical, mental or sensory disability, or any other status protected by law will not be tolerated.

Prohibited harassment is verbal or physical conduct that shows hostility toward an individual and includes derogatory comments, slurs, jokes, innuendoes, cartoon, pranks, or physical harassment based on an employee's protected class membership. Harassment also includes negative actions based on an employee's participation in activities identified with or promoting the activities of the protected group.

Sexual harassment will not be tolerated. Unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature constitute sexual harassment when (1) submission to such conduct is made either explicitly or implicitly a term or condition of employment, (2) submission to or rejection of such conduct is used as the basis

for employment decisions, or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work or performance or creating an intimidating, hostile or offensive working environment.

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

Every manager is responsible to ensure that the spirit and intent of the Agency's goals and harassment policies are achieved. Employees have the right to be free from harassment on the job either from co-workers or management.

B. INDIVIDUALS COVERED

These anti-harassment policies apply to all applicants, employees, volunteers, and Board members, and prohibit harassment, discrimination and retaliation whether engaged in by fellow employees, by a supervisor or manager or by someone not directly connected to Snotrac (e.g., an outside vendor, consultant, or client).

IX. ETHICAL STANDARDS AND CONDUCT

A. CODE OF CONDUCT

Snotrac is committed to the highest moral and ethical standards of behavior by its employees, Board Members and volunteers. This is rooted in our conviction that the common good of society as well as the agency depends on the honesty, integrity and responsibility of every employee and Board Member.

This code of conduct sets forth Snotrac standards for compliance with applicable laws and regulations; however, the issues listed below are not exhaustive.

1. Individual Responsibility

Individuals are responsible for conducting themselves ethically and in compliance at all times and should avoid even the appearance of impropriety. The ability to conduct oneself ethically and adhere to the standards set forth in compliance plans and the policy and procedures manual are reviewed during performance reviews.

2. Complete and Accurate Records

It is Snotrac policy to maintain and submit accurate and honest records relating to all billing or reporting to agency payers and to comply with all laws and regulations relating to but not limited to local, state and federal funding. Employees who document services shall do so honestly, describing the service actually rendered and the equipment or supplies provided.

3. Confidentiality

Individuals are expected to maintain the confidentiality of all customers, clients, and other agency related private information. Confidential information includes all non-public information pertaining to grantors, donors, our staff or our clients. Employees must maintain the confidentiality of information entrusted to them by Snotrac, except when disclosure is authorized by the Executive Director or required by laws or regulations. Anyone identifying himself or herself as an employee or volunteer of Snotrac is not acting as an individual and thus is expected to adhere to this policy. Employees conducting business with outside agencies including the press, or individuals, may not disclose unauthorized information.

Confidential client information should be furnished outside of the agency only with written, informed consent and approval of the consumer or client or their authorized representative, except as specifically required by law. Use of information internally should be driven by a “need to know” basis.

- a. Confidential Health, Income, and Immigration Status Information. In assisting people with disabilities, low incomes, or recent immigrants with transportation options, employees and volunteers may come in contact with confidential and privileged personal information. At all times, employees and volunteers must protect this information, in compliance with federal, state, and local laws.

4. Business Courtesies and Gifts

Neither Board Members nor staff may accept money or gifts from any competitor, customer, or anyone doing business with, or desiring to do business with the agency. Gifts of nominal value (\$50 or less) given as a sign of appreciation are the only exception. Staff and Board Members may not solicit personal gifts in any manner.

5. Consultant fees, Honoraria, Gifts

All employees and volunteers are encouraged to participate in a variety of community and professional activities. In those instances where an employee's or volunteer's activities are part of their regular Snotrac duties and responsibilities, any compensation shall be turned over to Snotrac. This includes all fees derived from Snotrac's reports, activities, paid training, events, or speaking engagements while employed by Snotrac or while representing Snotrac.

In some instances, an individual may do work that is based on activities or experiences prior to or separate from their regular duties and responsibilities. To avoid actual or appearance of or a bona fide conflict of interest, any employee who engages in any

remunerative activity in any field directly related to Snotrac programs must have prior approval by the Executive Director. The Board of Directors may review these issues for the Executive Director. No employee or volunteer may formally represent himself/herself as a spokesperson for Snotrac without prior approval of his/her supervisor.

B. DRUG AND ALCOHOL USE

The presence or use of illegal drugs or unauthorized alcohol on agency premises will not be tolerated. Illegal drugs, as referred to in this policy, includes drugs that are not legally obtainable, as well as drugs that are legally obtainable, but are used for illegal purposes.

The sale, purchase, transfer, distribution, use or possession of illegal drugs as defined above, by anyone on agency premises, or while conducting agency business, is prohibited.

Moreover, employees are prohibited from reporting to work under the influence of alcohol or illegal drugs. The Agency reserves the right to request testing if there is sufficient reason to believe an employee is under the influence while at work, or in the event of an accident while on company premises or driving a company vehicle.

The use or presence of alcoholic beverages on agency premises or while conducting agency business must be approved by the Executive Director. The agency reserves the right to take necessary action to maintain a work environment free of drugs and alcohol including but not limited to testing and termination.

C. ATTENDANCE AND PUNCTUALITY

To maintain a productive work environment, Snotrac expects employees to be reliable and punctual in reporting for scheduled work. Absenteeism and tardiness place a burden on other employees and on the agency. Employees are expected to report to work on time and maintain daily attendance. Excessive absenteeism may lead to termination.

D. PERSONAL CONDUCT AND APPEARANCE

In order for Snotrac customers to have confidence in the trust they have placed with the agency, and all employees have placed in the agency, the office must have a professional, dignified, and gracious atmosphere. Courtesy and graciousness in dealing with customers are part of our service. Questions regarding appropriate conduct or attire should be addressed to management.

E. AGENCY PROPERTY

Employees are responsible for all Snotrac property, materials or written information issued to them or in their possession. All agency property must be returned to the agency on or before an employee's last day of work.

F. OUTSIDE EMPLOYMENT REFERENCES

During and after employment at Snotrac will only release an employee's job title and dates of employment to third parties.

G. CONFLICT OF INTEREST

Employees and volunteers acting on behalf of Snotrac have a fiduciary duty to Snotrac, including the duties of loyalty, diligence, and confidentiality. Despite the self-interests that employees, volunteers, and Board members inevitably have, those in positions of responsibility, in their fiduciary capacity, must act in utmost good faith on behalf of Snotrac. In accepting their positions, they undertake to give the agency the benefit of their care and best judgment and to exercise the powers conferred solely in the interest of the agency and not for their own personal interest.

A direct conflict of interest arises when an individual holds a position of responsibility with Snotrac and also holds a material interest in the issue at hand. Direct conflicts of interest arise, for example, when an individual engages in a personal transaction with Snotrac or holds a material interest or position of responsibility in an organization involved in a specific transaction with Snotrac. Such a situation places the person in the impossible position of attempting to represent both Snotrac and one's personal interests or those of the other organization. The appropriate and necessary course of action in such cases is to disclose the conflict and recuse oneself, i.e., to remove oneself from deliberations and actions on the issue.

X. WHISTLEBLOWER POLICY

A. COMPLAINT PROCEDURE

Snotrac strongly urges the reporting of all incidents of discrimination; harassment; retaliation; codes of conduct violations; legal or ethical breaches, fiscal mismanagement; or other concerns — regardless of the offender's identity or position. Early reporting and intervention have proven to be the most effective method of resolving actual or perceived issues. Prompt reporting of complaints or concerns assure that rapid and constructive action can be taken.

Individuals who believe they are being subjected to conduct prohibited by these Personnel Policy Guidelines and other organizational policies are encouraged, if they feel comfortable in doing so, to promptly advise the offender that the conduct is illegal, inappropriate, offensive and/or unwelcome and request that such conduct stop.

Snotrac has an open door policy. Employees and volunteers should feel free to share their questions, concerns, suggestions, or complaints with their supervisor.

If, for whatever reason, the employee or volunteer does not feel that the supervisor is a suitable person to whom to report the incident, the employee or volunteer should contact the Executive Director. If the allegation involves the Executive Director then the President of the Board of Directors should be contacted.

Snotrac will also maintain an online form for anonymous tips and complaints from employees, volunteers, clients, and the general public that will be monitored by the Executive Director and an appointee of the Board of Directors.

B. INVESTIGATION

In all instances, a prompt, thorough, fair investigation will take place, giving careful consideration to protect the rights and dignity of all people involved.

The investigation may include individual interviews with the parties involved and, where necessary, with the individuals who may have observed the alleged conduct or may have other relevant knowledge.

Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation.

Snotrac will take those steps it feels necessary to resolve the problem which may include verbal or written reprimand, suspension, or termination.

C. RETALIATION IS PROHIBITED

Snotrac prohibits retaliation against any individual who in good faith reports conduct that violates organizational policy or who participates in an investigation of such reports. Retaliation is a serious violation of this policy and will be subject to disciplinary action.

XI. POLICY CHANGES

It is inevitable that new policies will need to be written from time to time and old policies will need to be revised. These guidelines cannot possibly cover all situations that may arise. Should any employee need further information, or if anyone would like to discuss any policies in the Guidelines, please feel free to speak to a supervisor, or the Executive Director.

RECEIPT OF PERSONNEL POLICIES

I have received a full and complete set of the Snotrac Personnel Policy Guidelines. I acknowledge that it is my responsibility to read said policies and address any questions concerning them to my supervisor.

Employee Signature

Date