

The Guild
FOR HUMAN SERVICES

FY26 Employee Handbook

Revised December 8, 2025

Table of Contents

WELCOME TO THE GUILD

Welcome Letter	8
Mission and Values	9
Employee Classifications	10
I-9 Immigration Form	10
Introductory Period	11
Orientation and Training.....	12
New Hire Packet.....	12

EMPLOYEE ROLES AND RESPONSIBILITIES

Job Descriptions	14
Confidentiality	14
Personal Appearance	15
Conduct.....	16
Human Subject Research.....	19
Nepotism	20

EMPLOYEE DOCUMENTATION

Personnel Files	22
Promotions and Transfers.....	23
Performance Evaluations	23
Background Records Check	24
Use of Images	25

EQUAL EMPLOYMENT AND SAFETY POLICIES

Equal Opportunity Employment	27
Harassment	28
Sexual Harassment	29
Workplace Safety and Nonviolence Policy.....	31
Reporting	32

COMPENSATION AND BENEFITS

Payroll Procedures	35
Salaries	35
Safe Harbor	35
Overtime.....	36
Other Assigned Duties	37
Vacation.....	38
Holidays.....	39
Intercession Holidays.....	40

Personal Time Off.....	41
Health Benefits	43
Retirement Benefits	45
Employee Assistance Plan	45
Education Assistance Programs	46
Meals and Meal Break	47
Workers' Compensation.....	48

WORKPLACE POLICIES

Attendance.....	50
Inclement Weather	51
Secondary Employment.....	51
English Proficiency	52
Drugs and Alcohol	52
Corporate Compliance Program.....	53
Employee Protection Whistleblower Policy.....	55
Conflicts of Interest.....	56
Solicitation.....	57
No Smoking.....	59
Exit Interviews.....	59

PERSONAL AND GUILD PROPERTY

Use of Guild Facilities	62
Maintenance of Work Areas, Residences and Vehicles.....	62
Use of Information Technologies and Systems.....	62
Guidelines for Social Media.....	64
Parking	65
Guests and Visitors	66
Electronic Device Use	66
Guild-Issued Cell Phones	67
Employee Safety and Personal Property	68
Expense and Damage Reimbursement.....	69
Use of Guild Vehicles.....	70
Use of Personal Vehicles	71
Keys.....	71
Employee Identification Badges	72
Security Cameras.....	72
Corporate Credit Card	72
Intellectual Property.....	73

LEAVES OF ABSENCE

Family and Medical Leave	75
Massachusetts Family Medical Leave Law.....	78

Necessities Leave.....	80
Jury and Witness Duty	80
Military Leave.....	81
Bereavement Leave	82
Limitations on Leaves of Absence.....	82
Supervision...	84
Discipline	96
Employee Concerns	87

HEALTH AND SAFETY

Emergency Medical Supplies.....	89
Automated External Defibrillation	90
Worker Injury Protocol	90
Employee Morale, Health and Welfare Activities	91

Important Information about Employee Handbook

The Guild for Human Services, Inc. has developed the Employee Handbook to provide an overview of The Guild's employment philosophy, benefits programs and employee-relations policies. **The Employee Handbook is NOT an employment contract.**

Revocation of Prior Policies

- This Employee Handbook supersedes and revokes any previous Employee Handbook or written or unwritten policies or practices.

Non-Contractual

- The contents of the Employee Handbook are presented as a matter of information only.
- The Employee Handbook is not intended to create, nor is it to be construed to constitute, a contract, express or implied, between The Guild and any employee or employees.
- It does not guarantee any fixed terms and conditions of employment.
- Any written material distributed to employees pursuant to state or federal law does not impose any contractual liability on The Guild.

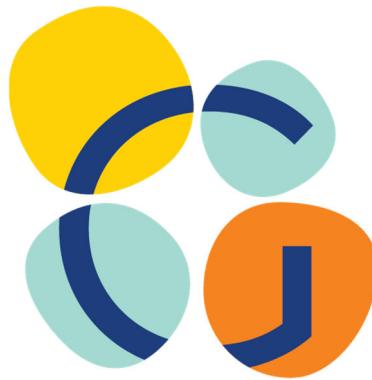
Policies Subject to Change

- While The Guild believes wholeheartedly in the plans, policies and procedures described in the Employee Handbook, they are not conditions of employment, nor are they promises or guarantees of future benefits or any other terms and conditions of employment.
- The Guild reserves the right to modify, revoke, suspend, terminate or change, at its sole discretion, without the consent of any employee, any or all such plans, policies or procedures, in whole or in part, at any time, with or without notice.

At-Will Employment

- Employment at The Guild is at-will.
- As an employee at-will, employment at The Guild is not guaranteed for any specific period.
- An employee may terminate employment, for any or no reason and at any time, with or without any prior notice. However, if an employee does not provide The Guild with reasonable notice of departure, the employee may be considered ineligible for rehire. The Guild may terminate employment at any time, at its sole discretion, for any or no reason, with or without any prior notice, and regardless of the date of payment of wages or salary.
- Neither the Employee Handbook nor any other organizational document confers any contractual right, either express or implied, to remain in The Guild's employ.
- Employment at-will can be changed only by a written employment agreement signed by the employee, the chief financial officer and the chief executive officer or, in

- the case of the chief executive officer, by the chair of the Board of Trustees.
- Employees are expected to consult their supervisor or the Human Resources Department with any questions about interpretation or application of policies.



Section 1: Welcome to The Guild

Welcome Letter

Dear Guild Colleagues,

Welcome to The Guild for Human Services! We are looking forward to having your expertise on our team!

There is a lot to learn as you get started in these first weeks. You may feel a bit overwhelmed with the amount of training and new processes we're throwing at you. We understand. Our best advice is to start by focusing on what is most important, our mission:

The mission of The Guild for Human Services is to educate, encourage and empower individuals with intellectual disabilities so they may achieve their full potential to lead high-quality lives and participate meaningfully in society.

Notice that The Guild's mission is about *quality of life*. That quality extends to you. The Guild's leadership is committed to your professional growth and connection to the people we serve. Your daily work experience should be filled with meaning and impact.

To that end, we encourage you to learn as much as you can while you are at The Guild, including the information outlined in the Employee Handbook. If you need help along the way, we are here to support you.

We can't wait to see all that you accomplish at The Guild!

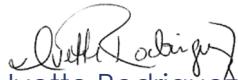
Take care,



Amy C. Sousa, PhD, MSc, MHCDS
Chief Executive Officer



Maureen Costello-Shea, MEd
Chief Program Officer



Ivette Rodriguez, MS
Chief Financial Officer



Michael J. Clontz, MSW, LICSW
Chief Operating Officer



Annie Willis, MS, BCBA
Chief Education Office

Mission and Values

Mission

The mission of The Guild for Human Services is to educate, encourage and empower individuals with intellectual and developmental disabilities so they may achieve their full potential to lead high-quality lives and participate meaningfully in society.

The Guild's Core Values

We, The Guild Staff, believe...

Safety

All people should live in security, free from unwanted fear, harm, coercion, and deprivation.

Autonomy

We advance personal empowerment and decision making over body, work, health, leisure, and relationships.

Community

We enhance connectedness, reciprocity, and belonging.

Dignity

We respect the worth of all people, including their virtues, beliefs culture, preferences, and choices

Growth

We support the ongoing process of inspiration, discovery, and achievement at all levels.

Employee Classifications

All Guild employees fall within one of the classifications below.

Full-time employees - Employees whose job descriptions require them to work at least 40 hours per week on a regular basis. Full-time employees are eligible for The Guild's benefits. For more information, refer to section on Compensation and Benefits.

Part-time employees - Employees whose job descriptions require them to work fewer than 40 hours per week on a regular basis, although such employees may from time to time work 40 hours or more per week. Part-time employees, working a minimum of 20 hours a week, are eligible for certain benefits of The Guild on a prorated basis after the applicable requirements for length of service have been met, and statutory benefits required by law.

On-call/relief/substitute - Employees who have no minimum scheduled hours and no specifically assigned residence at which to work. "On- call/relief/substitute" workers are not eligible for Guild benefits, except for statutory benefits required by law.

Temporary employees - Employees who have been hired for a particular project or a specified period of time. Temporary employees may work a full-time or part- time schedule, depending on the circumstances and The Guild's need, and are not eligible for Guild benefits, except for statutory benefits required by law.

In addition to the above classifications, employees are categorized as either "**exempt**" or "**non-exempt**" for purposes of federal and state wage and hour laws. Employees classified as "**exempt**" do not receive overtime pay; they generally receive the same weekly salary. "**Non-exempt**" employees are all other employees and are paid one and one-half times their regular hourly rate for hours **worked** more than 40 in a work week.

I-9 Immigration Form

The Immigration Reform and Control Act of 1986 requires The Guild to obtain proof of identity and employment eligibility from every new employee. Within the first three days of employment, each employee is required to complete an I-9 Immigration Form. The Guild also is required to reverify the employment eligibility status of certain existing employees. Any employee who fails to provide information regarding employment eligibility or who provides false information regarding employment eligibility will be subject to immediate termination.

Introductory Period

All new and rehired employees, and all current employees who have transferred or been promoted to a new position, are considered in their introductory period for 90 days and will receive a supervisory review during that period. The introductory period gives new employees an opportunity to learn the duties of their position and to evaluate the job and The Guild. It also allows The Guild time to orient, train and assess the aptitude and performance of new employees. The introductory period may be extended at the discretion of The Guild.

While in the introductory period, new employees accrue but may not use vacation time. All new full-time employees will receive a prorated number of personal hours based on their date of hire. Employees can access personal time during the introductory period with supervisor approval and medical documentation. Employees are eligible for health, life, retirement and disability insurance benefits (according to plan eligibility guidelines) during the introductory period.

A new employee's supervisor may discuss unsatisfactory job performance with the new employee during the introductory period and give the new employee an opportunity to improve their work performance. A new employee whose performance is deemed unsatisfactory by The Guild may be discharged at any time during the introductory period without resorting to The Guild procedure regarding Employee Concerns.

In most cases, the introductory period ends upon completion of the oral or written introductory performance review. The new employee's supervisor will evaluate the new employee's performance and discuss that evaluation with the employee at the introductory performance review. Acceptable performance during the introductory period and continued employment after the period ends do not alter the employee's at-will employment status or guarantee employment for any period.

Employee Service Credit

"Length of service" refers to the length of time that an employee spends as active full-time or part-time employee with The Guild for Human Services. Service begins the day the employee becomes full-time or part-time employee.

Length of service may be used in determining certain employee benefits, such as time-off benefits. Employees will not lose credit for service with The Guild provided their last day of service was within 90 days of again

becoming an active employee. Human Resources will discuss this issue with any rehired employees upon hire.

Orientation and Training

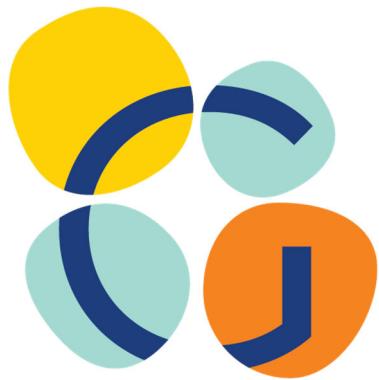
Shortly after an employee begins employment with The Guild, they will receive an orientation session that includes an overview of The Guild's goals, philosophy, organizational structure, personnel policies and procedures, and employee benefits. Eligible employees may sign up for medical, dental, disability and life insurance through the Human Resources Department.

Pre-Service training is conducted for all full and part-time employees. Completion of pre-service is a condition of employment for all Direct Program Employees. These courses cover topics that enable our staff to work with the residents and students of The Guild.

A new employee's supervisor will arrange for any specific training that allows the employee to perform effectively. Attendance at required training courses is the employee's responsibility. An employee desiring additional training should request it from their supervisor.

New Hire Packet

A new employee must complete a New Hire Packet, available from the Human Resources Department. The packet contains a variety of forms, insurance information and other documentation required for an employee to be placed on the payroll. These forms need to be completed within three days of employment. A copy of valid driver's license or government-issued photo identification and work authorization are required.



Section II: Employee Roles and Responsibilities

Job Descriptions

A central job description file is in the Human Resources Department as well as on The Guild's server under "All Staff." Written job descriptions are available for all positions at The Guild. These descriptions serve to identify essential job functions and duties, although those duties may evolve over time. A copy of an employee's specific job description is included with their employment letter. The Guild welcomes employee input for the purpose of keeping job descriptions current. Employees should contact their immediate supervisor to discuss questions or concerns about a job description.

Confidentiality

During work, employees may learn or encounter confidential information about The Guild or the individuals it serves; disclosure of such information would be harmful to The Guild or its clients. Employees are prohibited from disclosing such confidential information to anyone outside The Guild without the written consent of The Guild.

Client Confidentiality

The Guild strictly adheres to all state, federal and ethical guidelines pertaining to issues of confidentiality. All staff are required to respect the confidentiality of the clients, including but not limited to the identity of clients, treatment plans, diagnoses or any other protected health information as identified by Public Law 104-191 or protected educational information as identified by The Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g; 34 CFR Part 99.

The Guild is a covered entity per the Health Insurance Portability and Accountability Act of 1996 (HIPAA). HIPAA requires covered entities to safeguard the privacy and security of protected health information (PHI). All Guild staff and volunteers must safeguard PHI that they access, use and/or disclose. PHI access must be limited to the amount minimally necessary to provide services.

In addition, all professional staff are required to follow the code of ethics of their specific discipline and are subject to the legal provisions for professional licensure, including, but not limited to, confidentiality provisions.

Guild staff and volunteers are responsible for ensuring that appropriate safeguards are implemented to protect confidentiality, integrity and availability of confidential client information in The Guild's care. Such safeguards shall include administrative, technical and physical safeguards pursuant to the HIPAA Security Rule. Safeguards shall apply regardless of form or format of data, device or storage (e.g., verbal, paper, electronic, server, portable device, etc.). All members of The Guild community are obligated to

report immediately a known or suspected information security violation by reporting it to the privacy officer or chief executive officer.

Notification of any person impacted by a breach of confidentiality shall be reviewed and coordinated by the privacy officer and chief executive officer and shall follow appropriate legal requirements.

Exceptions to client confidentiality include but are not limited to the following:

- Guild employees are mandated by law to report a reasonable suspicion of physical abuse, sexual abuse or neglect of a child (under 18 years old) to the Massachusetts Department of Children and Families.
- Guild employees are mandated by law to report a reasonable suspicion of physical abuse, sexual abuse or neglect of a vulnerable adult (18 years or older) to the Massachusetts Disabled Persons Protection Commission.
- Guild employees are required to report credible threats that an individual has an actionable plan to harm himself or another.
- Guild employees are required to report information related to a lawful court order, including but not limited to a warrant.

Proprietary Confidentiality

Confidential information includes any and all information, other than information that at any time becomes lawfully available to the public. Such information includes but is not limited to program information or strategies; business information such as market strategies, employee information, contractual information, billing information and manuals; contracts; and research data.

Confidential information can be in written or oral form. Communication of this type of information outside of normal work channels is expressly forbidden.

All such confidential information is the property of The Guild. Upon termination of employment, and at any other time upon request of The Guild, an employee shall promptly deliver to The Guild any and all physical and electronic records in the employee's possession or control that contain confidential information about The Guild, whether those records were supplied to the employee or prepared by the employee and in whatever form they take. The employee's obligation to observe confidentiality shall be applicable following the employee's separation of employment with The Guild. Nothing herein is intended to restrict an employee's ability to engage in legally protected activities, including protected concerted activities.

Personal Appearance

This policy concerns appropriate attire during working hours and applies to all Guild staff, volunteers and interns and to all offices, facilities and residences of The Guild. The personal appearance of employees should be appropriate for the work environment. Employee attire should be neat, clean, well maintained and appropriate for an

assigned position. Employees should avoid attire that will interfere with their ability to perform job responsibilities safely. Employees' attire should provide an appropriate model for individuals served. No profane or offensive clothing shall be worn.

For safety reasons, these dress code rules always apply:

- Employees providing direct care SHALL NOT wear open toe shoes or beach-style flip flops, scarves, strings or hoodies that dangle away from the body.
- An employee's attire should not interfere with safety or job performance and should not distract others. Large or dangling jewelry is prohibited.
 - Ear jewelry must be less than two inches in diameter and length. If safety is a concern, individual departments may modify this guideline to be more protective of safety.
 - Gauges must be solid and not exceed $\frac{1}{4}$ inch in diameter. Jewelry connectors are not permitted.

This policy is intended to provide guidelines on dress and appearance and is not meant to address all situations. Therefore, depending on the nature of the work environment, work performed, involvement with the public or other circumstances, there may be some variation in dress guidelines. Consistent with this policy, exceptions can be made at the department level by the department director with approval from the chief officer overseeing the division to reflect the nature of the work or special events.

Employees who report to work and are not in compliance with this policy may be sent home to change and return to work, unless some other remedy can be arranged, such as an employee putting on a jacket. Habitual non-compliance with this policy will result in disciplinary action up to and including termination. The Guild may impose whatever additional appearance and safety requirements it deems necessary at its sole discretion.

Employees should address questions regarding this policy or the appropriateness of attire to their department director, chief officer or the Human Resources Department.

Employees who may wish to request reasonable accommodation in connection with this policy should contact the Human Resources Department.

Workplace Expectations

The Guild maintains certain expectations and regulations regarding employee behavior that are necessary for the efficient operation of The Guild and for the benefit and protection of the rights and safety of all. Conduct that interferes with daily operations, that is offensive or discriminatory to students, residents or fellow employees will not be tolerated.

Conduct

All employees are expected to conduct themselves in a manner that is conducive to the efficient operation of The Guild. Examples include, but are not limited to, the following:

- Report to work punctually as scheduled or notify the supervisor when preparing to be absent from work or unable to report for work on time.
- Comply with all health and safety regulations.
- Perform assigned tasks efficiently.
- Observe confidentiality.
- Refrain from behavior deemed offensive or discriminatory toward students, individuals we support, their families or fellow employees.
- Treat parents, guardians and all other visitors with professionalism at all times.
- Maintain workplace and work area cleanliness and orderliness.
- Refrain from smoking/vaping on all Guild properties.
- Dress safely and appropriately.
- Adhere to all Guild policies and procedures.
- Report behaviors that may potentially compromise the health and safety of others.

Failure to adhere to expected work conduct, including conduct not specifically described above, will subject the individual involved to disciplinary action up to and including immediate termination. In addition, there are behaviors that are prohibited and will subject the individual involved to disciplinary action up to and including immediate termination. Examples of such behaviors include, but are not limited to, the following:

- The unauthorized use of alcoholic beverages on The Guild's property.
- Reporting for work while under the influence of alcohol or drugs.
- The possession or use of a controlled substance other than a drug prescribed by a physician.
- The sale or distribution of unauthorized drugs.
- Physical or emotional assault on a fellow employee, student, or resident.
- Theft or intentional misuse of The Guild's property or the property of another employee, student, or resident.
- The refusal of an employee to follow management's lawful instructions concerning a job-related matter.
- The use of profanity or abusive language.
- Illegal or unauthorized gambling on The Guild's property or otherwise on duty.
- The possession of firearms or other weapons on The Guild's property.
- Falsifying any record or report such as an application for employment, a time sheet, incident report, log entry or mileage report.
- Threatening or intimidating other employees or individuals served.
- Leaving assigned area during working hours without supervisor permission
- Sleeping during work hours.
- Harassment of employees or individuals served based on race, sex, religion, color,

age, national origin, disability, sexual orientation or any other protected class.

- Leaving work without permission or before completing a scheduled shift.
- Theft or abuse of Guild property.
- Fraud or misrepresentation on a resume, background record check form, application or reference for employment submitted to The Guild.
- Fraud or misrepresentation with respect to any financial matter, including fraudulent billing to third parties or fraudulent submission of expenses.
- Acts constituting a violation of state or federal criminal law.
- Failure to notify the chief executive officer or the director of human resources of arrest, criminal charge or incarceration of the employee during his or her period of employment.
- Having knowledge of any of the above behaviors by others and failing to report it to the employee's supervisor, Human Resources Department, or the chief executive officer, or covering up such behaviors.

Due Care for Individuals Served

The Guild practices positive behavioral support for individuals served. All employees are expected to foster and promote environments that enhance quality of life through teaching and recognizing positive behavior, acknowledging success and supporting individuals in times of challenge.

Employees are expected to treat individuals served and fellow staff in a courteous, respectful manner always.

Staff are required to support individuals' needs by doing the following:

- Supervise individuals served by The Guild always and everywhere, unless otherwise specified in the student's Individual Education Plan (IEP) or the adult's Individual Support Plan (ISP).
- Always follow all safety rules and regulations everywhere, including on or off The Guild grounds, indoors or outdoors. The physical safety of individuals served is staff's responsibility.
- Handle emergency situations in staff teams, never alone.
- Safeguard medicines, tools and any implements dangerous to individuals served.
- Protect individuals' confidentiality and personal dignity. Do not reveal or allow to be released any information, verbally or in writing, about individuals served to any unauthorized person or agency. This includes conversations in the presence of individuals served or parents and family members.
- Follow behavior management plans and other policies, regulations, rules and procedures to ensure individuals' safety.
- Avoid any action or statements that could initiate, encourage or condone any disruptive or inappropriate behavior by the individuals we support.

Under no circumstances will individuals served be subjected to the following:

- Cruel, hazardous or abusive treatment.
- Corporal punishment.
- Verbal abuse.
- Sexual contact by staff.
- Deprivation of food, sleep, shelter or bathroom facilities.
- Physical restraint as a form of punishment.
- Violation of individual rights.
- Unauthorized disciplinary measures.

These examples are illustrative of the type of behavior expected of staff and activity that is not permitted. Knowledge of any violation must be reported immediately through the prescribed abuse and neglect reporting procedure. This process is described in the abuse and neglect reporting policy contained in the program policies of The Guild. All employees of The Guild are mandated reporters; the failure to report abuse or neglect is a crime under Massachusetts law.

Any employee who has knowledge of such behavior and does not report it to a supervisor, IAIC or chief officer will be subject to disciplinary action up to and including termination. No internal process or supervisory consultation may delay a mandated report to legal authorities.

Human Subject Research

It is the policy of The Guild that all research involving human participants must be conducted in accordance with accepted ethical, federal and professional standards and that all such research must be approved by The Guild's chief executive officer. In the review and conduct of research, The Guild is guided by the ethical principles set forth in the Belmont Report. In addition, all human subject research conducted by or under the auspices of The Guild will be performed in accordance with the U.S. Code of Federal Regulations, DHHS (CFR), Title 45 Part 46 (45 CFR 46), entitled Protection of Human Research Subjects, and Parts 160 and 164, entitled Standards for Privacy of Individually Identifiable Health Information.

In addition, research conducted with human subjects must be performed in accordance with the accepted ethical principles established by professional organizations or societies that are applicable to the area of investigation. The actions of The Guild will also conform to all other applicable federal, state and local laws and regulations.

The Guild does not permit or conduct pharmaceutical or medical research.

Nepotism

Relatives

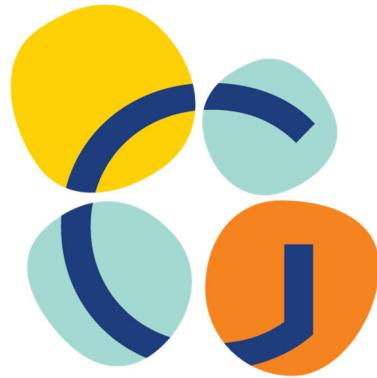
The Guild encourages employees to refer qualified individuals to The Guild for employment. Because simultaneous employment of relatives may pose problems for The Guild, special rules may be enforced in each situation. No employee shall directly supervise a relative, approve budgetary or expense requests of a relative or have any responsibility to evaluate the performance of a relative. Any employee who assumes a position within The Guild in which they are required to perform any of these tasks with respect to a relative should notify their supervisor immediately. Relatives of the individuals served by The Guild cannot work in the same program as the individual.

Personal Relationships

Employees should be aware that romantic relationships between The Guild employees may pose problems both for those individuals and for The Guild. The Guild expects the employees involved to exercise discretion and maturity in the manner in which they relate to each other at work.

Romantic relationships between employees of different levels of authority within The Guild may create actual or perceived favoritism. For this reason, neither party to a romantic relationship should participate in formal or informal supervision, review or evaluation of the other. The Guild may alter the work responsibilities of parties engaged in a romantic relationship to limit their professional contact with one another or may end the employment of either or both parties.

Under no circumstances shall an employee of The Guild be involved in a romantic relationship with an individual served by The Guild.



Section III: Employee Documentation

Personnel Files

The Human Resources Department maintains a personnel file for each employee. An employee's personnel file includes a job description, job title, rate of pay and other compensation, job application, resume, performance evaluation(s), waivers, disciplinary action(s), required training records, termination notice (if applicable), signed consent for Background Record Check (BCR) form(s), documentation that the BRC was conducted and current photo identification.

Personnel records shall not include any information about a person other than the employee if the disclosure of such information would subject the employee to a clearly unwarranted invasion of their privacy.

Employees may review or obtain a copy of their personnel file by submitting a written request to the Human Resources Department, providing five business days' notice. An employee may review their original personnel file only in the presence of the chief executive officer, chief finance officer or their designee. Any employee who believes that information in their personnel file is incorrect may request a correction. If The Guild does not agree with an employee's requested correction, the employee may submit a written statement explaining their position on the matter. This statement will become part of the employee's personnel file. All personnel files are the property of The Guild and no part of them may be removed from The Guild without authorization.

Employees are responsible for maintaining current personal information by updating it in UKG's Employee Self Service Portal or by contacting the Human Resources Department. This includes, but is not limited to, legal name, mailing address, phone number, email address, payroll deposit information, criminal history and work authorization status.

The Human Resources Department will not release information other than job title, dates of employment, and confirmation of salary about an employee to anyone not employed by The Guild unless the employee has given prior written authorization or unless issued with a lawful court order. To authorize the release of any additional information to prospective employers, employment agencies and search firms, an employee must sign a Release for Employment Information as part of the termination checklist or request one after leaving The Guild.

Former employees may request access and/or copies of their personnel record. The Guild shall be given five business days to produce such records. The Guild shall maintain all personnel records for seven years.

Promotions and Transfers

As part of The Guild's commitment to employees' professional growth, The Guild will announce some job openings through an internal posting process. The Guild encourages employees to apply for any position within The Guild for which they are qualified. To be eligible to apply for an open internal position, employees must meet the following requirements:

- be a current, regular full-time or part-time employee;
- have been in current position for at least six (6) months;
- maintain a performance rating of satisfactory or above;
- not be on a conduct/performance improvement plan, probation or warning;
- meet the qualifications of the job as listed on the job posting;
- and provide their current manager with notice prior to applying to the position.

Restrictions on transfers may apply to certain positions and/or programs. The Guild retains sole discretion to decide whether to fill a position by a transfer, a promotion or a new hire.

Compensation for any employee's new position will be governed by that position's salary range. When an employee accepts a lateral transfer, they ordinarily receive no increase in pay. If The Guild chooses to transfer an employee to a lower position, the employee's pay ordinarily will be decreased.

A transfer or promotion is not a guarantee of continued employment. All employees remain employees at will regardless of transfers or promotions.

Performance Evaluations

New employees will receive a performance review after the first 90 days of employment. Thereafter, performance evaluations will take place on a review schedule determined by The Guild, usually on an annual basis.

The performance evaluation provides an opportunity for the employee and supervisor to review the employee's performance and establish performance goals for the next year. The supervisor will complete a written performance evaluation form, which the employee is expected to sign, acknowledging that they have reviewed the evaluation and been afforded an opportunity to provide feedback. All written evaluations are kept in the employee's personnel file.

Employees may request a copy of the evaluation. A performance evaluation does not necessarily result in a salary increase. All salary increases must be approved by the chief executive officer and are at the discretion of The Guild.

Background Records Check

General Information

- A Background Records Check (BRC) includes a Criminal Offender Record Information (CORI) check and a Department of Children & Families (DCF) for The Guild School and Disabled Person Protections Commission (DPPC) check for The Guild's Adult Program. BRC is required for all full- and part-time employees and volunteers. In addition, the Massachusetts General Court requires all full- and part-time employees and volunteers to undergo a Sex Offender Registry Information (SORI) check and fingerprint-based checks of state and national criminal history databases. The Guild will reimburse the cost related to the fingerprint check if the receipt is submitted to the Human Resources Department within 30 calendar days of completion.
- Employees of The Guild School's residential or day programs will have no unmonitored contact with students until the employee has met "Full suitability" status.
- A BRC will be completed for all applicants considered for employment. Every three years, each employee and volunteer will repeat the BRC.
- Authorized personnel who conduct BRC for employees include the chief executive officer (licensee) and the person who oversees the hiring process (reviewer). These individuals are required to submit a reviewer request to licensing agencies every three years to maintain their status as licensee and reviewer.
- A BRC, which includes CORI, DCF, DPPC, SORI and fingerprint checks, will only be conducted at The Guild by authorized personnel and as authorized by licensing agencies. These individuals must submit a Background Record Check: Applicant/Licensee or a Background Record Check: Reviewer Request to gain authorization to process BRC checks for employees.
- All applicants will be notified that a BRC check is going to be conducted, and they will be required to complete and sign a consent for BRC form. Once complete, employees and volunteers will receive notification to undergo a fingerprint- based check of the national and state sex offender and criminal history databases. If requested, the applicant will be provided with a copy of the BRC policy.
- All personnel authorized to perform BRC checks at The Guild will be thoroughly familiar with and trained on the educational materials made available by the Department of Criminal Justice Information Services (DCJIS).

CORI Check Generated no Criminal Record, DCF Finding, SORI or National Fingerprint Record

In those instances when the CORI DCF, DPPC, SORI and National Fingerprint Record check results are processed and there is no indication of a criminal record or findings, The Guild will confirm full employment with the applicant and move the employee from

conditional status to full status.

Documentation

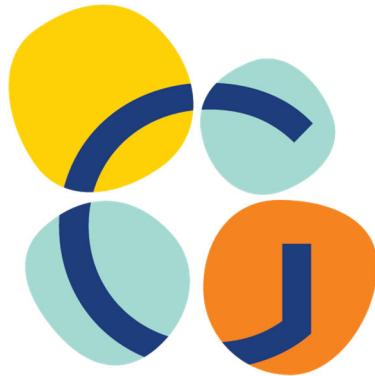
When an applicant is hired, the personnel file will contain a copy of the signed consent for Background Record Check form, documentation that the BRC conducted and a current photo identification.

Use of Images

The Guild for Human Services may at times use photographs, audio and/or video recordings of employees for purposes of publicity, marketing and recruitment. The images will be distributed via the internet, print publications and other media.

Opt-Out Option

Employees who choose to opt out of having their images used in the manner described in the paragraph above should contact the Human Resources Department for the required forms.



Section IV: Equal Employment and Safety Policies

Equal Opportunity Employment

The Guild is committed to providing equal opportunity in employment to all employees and applicants for employment who can perform all essential job functions as described in job descriptions, with or without reasonable accommodation. No employee or applicant shall be discriminated against based on race, religion, color, sex, age, national origin, military/veteran status, disability, sexual orientation or any other category protected by applicable law. Any employee who believes they have been the victim of employment discrimination based on any of these factors should report the matter immediately to their supervisor or Human Resources Department.

Consistent with obligations as a state and federal contractor, The Guild has established written non-discrimination, equal-employment opportunity and drug- free workplace policies. Copies of these policies are posted at all Guild work sites.

Requesting Accommodation

Any employee or applicant who needs accommodation to perform the essential functions of their job should contact the Human Resources Department. The individual will be asked to specify what accommodation is needed to perform the job and submit supporting documentation explaining the basis for the requested accommodation, to the extent permitted and in accordance with applicable law. The Guild will review and analyze the request, including engaging in an interactive process with the employee or applicant, to identify if such accommodation can be made. The individual will be notified in writing The Guild's decision regarding the request within a reasonable period. The Guild treats medical information submitted as part of the accommodating process in a confidential manner. Medical information will not be included as part of a personnel record.

An employee with questions or concerns about equal employment opportunities in the workplace is encouraged to bring these issues to the attention of the chief executive officer. The Guild will not allow any form of retaliation against individuals who raise issues of equal employment opportunity. If an employee feels they have been subjected to any such retaliation, they should contact the chief executive officer.

Rights of Pregnant Workers

Massachusetts Pregnant Workers Fairness Act

Employees have the right to be free from discrimination in relation to pregnancy or a condition related to the employee's pregnancy.

Non-Harassment

It is The Guild's policy to maintain a working environment where no employee is harassed based on the race, color, religion, sex, sexual orientation, national origin, military/veteran status, age, disability or any other protected category of the employee.

Harassment is a verbal or physical conduct that demeans or shows hostility or aversion toward an individual because of his or her protected class status and that may be offensive to the employee and others; create an offensive, intimidating or hostile working environment; or interfere with another employee's work performance. Examples of such behavior include, but are not limited to, the following:

- Epithets, slurs, insults or negative stereotyping;
- Acts or jokes that are hostile or demeaning; or
- Written or graphic material that demeans, ridicules or shows hostility toward an individual or group.

The Guild will not tolerate any form of harassment of employees on the job by supervisors, other employees or by non-employees such as individuals served, vendors, contractors, funders or guardians. An employee who believes that they have been the object of harassment or who observes an incident of such harassment should report the matter immediately to their supervisor or the Human Resources Department. A supervisor who observes an incident that may constitute harassment or who otherwise becomes aware of such an incident should immediately notify the Human Resources Department, which will arrange for an appropriate investigation. All internal investigations of harassment complaints will be conducted confidentially to the fullest extent possible. Upon completion of the investigation, the employees directly involved will be advised of the results to the extent allowable by law.

Any supervisor or other employee who is found to have engaged in harassment of another employee will be disciplined in accordance with The Guild discipline policy. The Guild will not tolerate retaliation against any employee who makes a good faith report of a violation of this policy or who participates in an investigation.

All questions regarding this policy should be directed to the Human Resources Department.

Sexual Harassment

Introduction

In addition to general prohibition on harassment of others, The Guild strives to promote a workplace free of sexual harassment. Sexual harassment of employees occurring in the workplace or in other settings in which employees may find themselves in connection with their employment is unlawful and will not be tolerated by this organization. Further, any retaliation against an individual who has complained about sexual harassment or retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is similarly unlawful and will not be tolerated. The conduct that is described in this policy will not be tolerated, and The Guild provides a procedure to address inappropriate conduct, if encountered by employees.

The Guild will respond promptly to complaints of sexual harassment, and, where it is determined that such inappropriate conduct has occurred, The Guild will act promptly to eliminate the conduct and impose such corrective action as is necessary, including disciplinary action where appropriate.

Please note that while this policy sets forth goals of promoting a workplace that is free of sexual harassment, the policy is not designed or intended to limit The Guild's authority to discipline or take remedial action for workplace conduct deemed unacceptable, regardless of whether that conduct satisfies the definition of sexual harassment.

Definition of Sexual Harassment

Under Massachusetts law, sexual harassment means sexual advances, requests for sexual favors, and verbal or physical conduct of a sexual nature when submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of employment or a basis for employment decisions; or such advances, requests or conduct have the purpose or effect of unreasonably interfering with an individual's work performance or create an intimidating, hostile, humiliating or sexually offensive work environment.

Under these definitions, direct or implied requests by a supervisor for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits or continued employment constitutes sexual harassment. The legal definition of sexual harassment is broad and, in addition to the above examples, other sexually oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating a workplace environment that is hostile, offensive, intimidating, or humiliating to male or female

workers may also constitute sexual harassment. While it is not possible to list all those circumstances that constitute sexual harassment, the following are some examples of conduct, which, if unwelcome, may constitute sexual harassment, depending upon the totality of the circumstances, including the severity of the conduct and its pervasiveness:

- Unwelcome sexual advances, whether or not they involve physical touching;
- Sexual epithets, written or oral references to sexual conduct, gossip regarding one's sex life, comment on an individual's body, comment about an individual's sexual activity, deficiencies or prowess;
- Displaying sexually suggestive objects, pictures or cartoons;
- Unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments;
- Inquiries into one's sexual experiences;
- Discussion of one's sexual activities;
- Making direct or implied requests for sexual favors in exchange for actual or promised job benefits, as further described above.

All employees should take special note that, as stated above, retaliation against an individual who has complained about sexual harassment and retaliation against individuals for cooperating with an investigation of a sexual harassment complaint are unlawful and will not be tolerated by The Guild.

Complaints of Sexual Harassment

If any Guild employee believes they have been subjected to sexual harassment, the employee has the right to file a complaint with The Guild. This may be done in writing or verbally. To file a complaint, the employee may contact their supervisor or the Human Resources Department. These persons are available to discuss any concerns and to provide information about our policy on sexual harassment and the complaint process.

Sexual Harassment Investigation

The Guild will investigate promptly a complaint in a fair and expeditious manner. The investigation will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances. The Guild's investigation will include a private interview with the person filing the complaint and with witnesses. The Guild will interview the person alleged to have committed sexual harassment. When the investigation is complete, The Guild will, to the extent appropriate, inform the person filing the complaint and the person alleged to have committed the conduct of the results of that investigation.

If it is determined that inappropriate conduct has occurred, we will act promptly to eliminate the offending conduct, and where it is appropriate we will also impose disciplinary action.

Disciplinary Action

If it is determined that inappropriate conduct has been committed, The Guild will take such action as is appropriate under the circumstances. Such action may range from counseling to termination from employment and may include such forms of disciplinary action as we deem appropriate under the circumstances.

State and Federal Remedies

In addition to the above, if an employee believes they have been subjected to sexual harassment, the employee may file a formal complaint with either or both government agencies set forth below.

The United States Equal Employment Opportunity Commission (EEOC)
One Congress Street, 10th Floor
Boston, MA 02114
(617) 565-3200

The Massachusetts Commission against Discrimination (MCAD)
Boston Office: One Ashburton Place, Room 601, Boston, MA 02108, 617-727-3990
Worcester Office: 424 Dwight Street, Worcester, MA 01608, 508-799-8010
Springfield Office: 455 Main Street, Springfield, MA 01103, 413-739-2145

Workplace Safety and Nonviolence Policy

The Guild seeks to provide a culture of nonviolence, minimizing risks to safety and security. The Guild strives to provide students, residents and employees with the safest possible environment and the knowledge necessary to carry out their job duties safely. The Guild's safety efforts shall be ongoing and focus on continuous improvement. Working safely is a responsibility shared by all employees. Employees are encouraged to participate actively in The Guild's safety efforts, including engagement with and participation in the Safety Committee.

General Security

- All Guild employees are subject to regular background record checks in accordance with the Background Record Check policy herein.
- Firearms, knives and explosives are not permitted at any Guild location.
- The Guild provides numerous resources to ensure safety and security of The Guild's community, including but not limited to electronic locks and alarms, badging system, external cameras for some locations, and GPS tracking for vehicles.
- Emergency evacuation plans have been developed to meet the needs of each building where employees are located. Evacuations are practiced regularly with staff and individuals served.

Student/Individual Aggression

Many individuals served by The Guild can demonstrate disruptive and aggressive behaviors. Aggressive behavior among individuals with intellectual disabilities and autism does not necessarily reflect willful violence; often individuals lack the requisite social skills, which The Guild may help them learn. As a result, The Guild provides staff members with aggression prevention tools, such as instruction in the social, emotional and cognitive domains in which the individuals exhibit difficulties as well as de-escalation tools, such as verbal and physical intervention training and protective resources. Incidents of aggression at The Guild are met with immediate, nonaggressive consequences. Under no circumstances shall a Guild employee assault or abuse an individual served. The Guild takes measures to prevent aggression, including the following:

- Establishing reasonable norms and expectations.
- Avoiding confrontation.
- Minimizing competition.
- Using both verbal and nonverbal prompts and reminders.
- Providing desirable reinforcers for positive behavior.
- Intervening early (before the onset of aggressive behavior) whenever possible.
- Supervising carefully individuals served.
- Providing individual-specific interventions for challenging behaviors, including functional behavior assessments and behavior support plans.
- The Guild analyzes data to learn from and prevent future aggressive behavior, including multiple layers of review of student/individual aggression, contributing factors to such aggression and opportunities for improved intervention.
- The Guild provides staff members with knowledge of aggressive behavior and instruction in the social, emotional and cognitive domains in which the individuals exhibit difficulties. In addition, The Guild trains all client-facing staff members in verbal de-escalation, self-defense and physical intervention to emergency situations using the Nonviolent Crisis Intervention training program developed by the Crisis Prevention Institute.
- The Guild provides technical support for preventing, responding to and analyzing aggressive behaviors, including cameras in the main building and youth residences; protective equipment, such as pads and arm guards; phones and paging systems; and on-call staff support.
- The Guild works to provide appropriate follow-up and support to witnesses and others affected by students'/individuals' aggression through individual and group debriefings using the Crisis Prevention Institute's COPING (Control-Orient- Patterns-Investigate-Negotiate-Give) Model.
- The Guild reports incidents of individual aggression and/or injury to appropriate authorities, including, but not limited to, the Department of Elementary and Secondary Education, Department of Early Education and Care, Department of Developmental Services and the Occupational Safety and Health Administration.
- The Guild shall not retaliate against any employee for making a report to a lawful

authority, including local police.

Domestic, Interpersonal and Community Violence

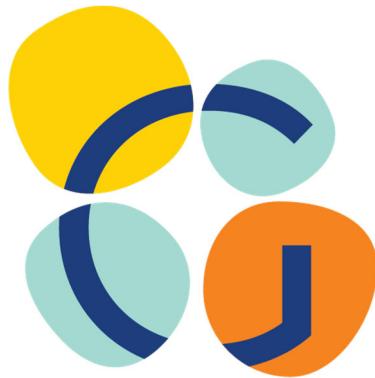
Violence is a public concern that affects employees in the community and the workplace. It is the policy of The Guild to promote safety in the workplace, respond effectively to the needs of victims of violence and hold perpetrators of violence accountable, thus helping to secure the fundamental human right to be free from violence.

- Offenders: The Guild will hold accountable employees who engage or assist in acts of violence. In cases in which The Guild finds that an employee has threatened, harassed or abused any employee or individual by using job-related authority or resources such as work time, workplace telephones, fax machines, mail, email or other means, the employee shall be subject to corrective or disciplinary action up to and including termination of employment. In the event an employee uses job-related authority or resources to assist a perpetrator to locate a victim, assist a perpetrator to perpetrate acts of violence or protect a perpetrator from appropriate consequences for abusive behavior, that employee shall be subject to corrective or disciplinary action up to and including termination of employment.
- Victims: The Guild's Human Resources Department and Employee Assistance Plan are available to support those in need of assistance around issues of violence and to make reasonable accommodations to support a workplace safety plan for employees. The Guild will make every effort to comply and assist with enforcement of all known orders of protection, particularly orders in which perpetrators have been ordered to stay away from work sites.

Employees who are victims, or whose immediate family members are victims, of domestic violence, sexual assault, stalking or kidnapping have the right to 15 days of leave for related needs, such as health care, counseling and victim services; safe housing; care and custody of their children; and legal help, protective orders and going to court. The Guild will make every effort to allow employees to use accrued paid leave before accessing unpaid leave for these purposes.

Reporting

If an employee is aware of unsafe acts, has an idea for performing tasks safer or wants to report a safety hazard, please act. The employee should talk with their supervisor or report the concern through the Safety Committee, Human Resources Department, chief operating officer or chief executive officer.



Section V: Compensation and Benefits

Payroll

The Guild's pay period for all employees is biweekly on Friday.

Direct Deposit

The Guild recommends that every employee initiates and maintains an account capable of direct deposit of pay. An employee may elect to have net pay, or portions of pay, deposited into checking or savings accounts. Employees must complete the appropriate direct-deposit forms and provide legal documentation for an open and valid bank account (voided printed check or bank originated letter).

It is the employee's responsibility to keep their banking information current. Banking information may be updated utilizing the Employee Self Service Portal in UKG or by contacting the payroll coordinator. Should an employee fail to notify Finance that the bank account was closed, The Guild will not issue a paper check until the funds are received back from the banking institution.

Documenting Hours Worked

Non-exempt (hourly) Employees are required to punch in at the start of work shift and out at the end of the shift utilizing The Guild's payroll system, UKG. All shifts must be recorded accurately by the employee. Repeated instances of not punching in/out may result in disciplinary action. Falsification of a time record will result in immediate termination of employment.

Exempt employees are required to track time off in the UKG system.

Salary Advances

The Guild does not permit advances on paychecks or against accrued paid time off.

Safe Harbor Policy for Exempt Employees

It is The Guild's intent 1) to pay all employees qualifying as **exempt** under the current provisions of the Fair Labor Standards Act (FLSA) and applicable state law on a salary basis, 2) to prohibit improper deductions from the salary of exempt employees, and 3) to correct any improper deductions.

An employee qualifying as **exempt** will receive their full salary for any week in which the employee performs any work, regardless of the number of days or hours worked except as follows:

1. If an employee is absent from work for a full day or more for personal reasons other

than sickness or disability;

2. If the employee is absent from work for a full day or more for sickness or disability as long as the deduction is made in accordance with a bona fide plan, policy or practice provided compensation for loss of salary caused by sickness or disability.
3. As a penalty imposed in good faith for violations of major safety rules;
4. As a disciplinary suspension of one or more full days imposed in good faith for violations of workplace conduct rules;
5. For time not worked during an employee's initial or terminal week of employment; and
6. For leave taken under the federal or any state Family and Medical Leave Act.

If at any time, The Guild inadvertently but improperly deducted payment for time not worked from an exempt employee, it is The Guild's intent to reimburse fully that employee in a timely manner.

If an employee believes their salary has been subjected to an improper deduction, please contact Payroll at 781-893-6000. The matter will be reviewed, and steps will be taken if and as necessary to provide reimbursement.

Overtime

The Guild may require employees to work overtime to meet operational requirements. All employees must obtain the approval of their immediate supervisor before working overtime. All overtime hours worked must be recorded on the employee's time sheet and be subsequently approved by the employee and the supervisor. No employee may be scheduled to work more than eighteen (18) hours without an eight (8) hour break. No employee is guaranteed overtime hours.

Employees who are exempt under federal or state wage-and-hour laws are expected to spend whatever time is required of them to meet their commitments to The Guild, without additional compensation or overtime pay.

Employees who are not exempt (including those whose regular work week consists of fewer than 40 hours of work) will be paid at their regular hourly rate for all hours of work up to 40 hours within a single work week and at one and one-half times their regular hourly rate for hours worked in excess of 40 hours within a single work week. An employee assigned to two or more different jobs will be paid for all straight-time hours at the specified rate assigned to that particular job and circumstance. The maximum overtime rate The Guild will pay is one and one-half times the regular hourly rate.

No overtime will be paid until the employee logs 40 hours of regular hours worked within the work week. Paid holidays, personal days and vacation time do not count as regular hours for the purpose of computing eligibility for overtime pay. Also, excused or unexcused absence hours are not considered regular hours in computing overtime.

Necessity of Employees Performing Additional Duties as Assigned

Exempt employees are paid a guaranteed salary for each workweek regardless of the hours worked. Occasionally exempt employees may be required to perform duties above and beyond their usual duties, or work may be available in other departments for which an exempt employee may be eligible for additional pay. For example, an exempt supervisor may have to perform the duties of a subordinate nonexempt employee while the subordinate employee is on leave or cover additional duties during staffing shortages or other emergency situations as determined by the chief executive officer.

Before any exempt employee performs work in addition to their regularly scheduled duties, the employee must receive prior written authorization from the department director, division chief **and** human resources (HR). All work done by an exempt employee will be deemed part of the employee's regular exempt work unless the employee and their direct supervisor previously have established by clear documentation that the work qualifies for additional pay and that written approval was given for such additional pay.

Additional pay may be provided in the following situations:

- The additional work is within the employee's regular job category and will be paid within the regular pay range, but it is performed for another department (other than the employee's regular department) and beyond the employee's regular work schedule.
- The additional work is separate and distinct from the duties and responsibilities of the employee's regular job classification. In this situation, the pay rate will be within the range of the assigned pay grade of the job classification that encompasses the supplemental work or at a pay rate approved by HR. The additional work is of a special or one-time nature, making it infeasible to hire a temporary employee. The rate of pay will be determined at the time of the assignment.

The number of hours for additional compensation should not exceed 520 within a calendar year. An additional pay form must be used to initiate and process additional compensation payments, which can be accessed on The Guild's All Staff drive or obtained from HR. Payments will be processed in the pay period following receipt of the additional pay form.

Vacation

The Guild provides paid vacation time to all full-time employees. Employees earn vacation time each fiscal year at different rates, based on their employment

classification and length of service. Vacation time begins to accrue upon the commencement of employment, but paid vacation may not be taken until employees have completed three months of service. In addition, vacation time cannot be taken in advance of accrual. These three months of service can be as a part-time or full-time employee. Part-time employees do not accrue vacation.

Vacation Accrual Rates

Each employee's vacation accrual rate is determined by his/her anniversary date, based on the number of complete years of active service that the employee has rendered. Accrual rates are governed by the following schedules:

Length of Service as of Anniversary Date	Accrual Rate Per Pay Period *Based on 40 hours worked	Annualized Accrual Rate
Up to two years	.385 hours	10 days
Two or more years	.577 hours	15 days
Five or more years	.769 hours	20 days
Chief officers (upon hire)	.769 hours	20 days

If an employee's employment status changes (for example, if the employee goes from part time to full time) the employee's vacation accrual rate will be adjusted accordingly.

Scheduling

To help The Guild ensure adequate staffing, employees must request vacation time, in writing, as far in advance as possible. Requests for time off in excess of two weeks must be requested 30 days in advance and approved by their division chief or their designee. The employee's immediate supervisor must approve all requests for vacation time. The Guild will attempt to accommodate each request but reserves the right to deny requested vacation time to meet the needs of The Guild. Failure to return to work on the expected return to work date may result in termination of employment.

Cap on Accrual

Employees are encouraged to take vacation in the fiscal year in which it is accrued. Unused vacation days may be carried over from one fiscal year to the next. Employees may not, however, carry over more than 240 vacation hours. Once employees have accumulated 240 vacation hours, their accrual of vacation will stop and will not resume until they have taken vacation and dropped below the 240 vacation hours.

Leaving The Guild

Employees who leave The Guild will be paid for any accrued and unused vacation time earned through the date of termination at the rate of pay in effect for their position as of

the date of departure.

Holidays

Paid Holidays

The Guild's Human Resources Department will distribute the annual holiday schedule at the beginning of each fiscal year, which begins on July 1 and ends June 30. The Guild observes the following holidays:

New Year's Day	Labor Day
Martin Luther King Jr. Day	Indigenous People's Day
President's Day	Veteran's Day
Patriot's Day	Thanksgiving Day
Memorial Day	Friday After Thanksgiving
Juneteenth Independence Day	Christmas Day
Independence Day	

Should a company-recognized paid holiday fall on a Saturday, the holiday will usually be observed on the preceding Friday. If the holiday falls on a Sunday, the following Monday will usually be observed as the holiday.

Eligibility for Paid Holidays

All regular, full-time employees will receive holiday pay at their regular rate of pay.

The Guild operates School and Adult residential programs that are open 365 days per year. There are times when the day program at the academic program and administrative offices will not be in session, but the residences are always open. When the residences are open, staff must be available to work. Residential program staff will work with their supervisors to schedule any paid holiday time off. Time Off approval will be at the discretion of the supervisor and determined by the needs of the program.

- Exempt employees who are eligible for paid holidays, but who may be required to work on a company holiday will receive another day off. Time must be taken within 30 days of the holiday.
- Nonexempt employees who are eligible for paid holidays, but who may be required to work on a company holiday will receive eight (8) hours of holiday pay in addition to their regular pay for time worked.

Holiday pay is not to be considered hours worked in the computation of overtime.

Employees *will not* be entitled to holiday pay in the following circumstances:

- The employee is in out-of-pay status or in layoff status.

- The employee is on leave of absence when the holiday occurs.

If a company holiday occurs on an eligible employee's vacation day that day will be charged as a holiday, not as a vacation day.

Religious Holiday Observance

Employees will be granted time off to observe religious holidays that they sincerely believe are required to be observed by their religion. However, employees must give their supervisor at least 10 days' advance notice of the leave. Such time shall be without pay unless the employee elects to use a personal day or a vacation day.

Intercession Holidays

Intercession Holidays for The Guild School's Educators

The Guild School will operate based on The Guild School Academic Calendar, which provides for 234 days of in-session school, professional days, school closures and snow make up days. The Calendar will be distributed annually for the fiscal year beginning July 1 and ending June 30.

Intersession holidays are the periods between Christmas Day and New Year's Day and between Patriots' Day and the following Friday. During these weeks, The Guild School's academic program is closed and, under most circumstances, employees whose primary work site is The Guild School's educational program will not be required to work.

If non-exempt employees educational staff are required to work on an Intersession closing day they will receive eight (8) hours' pay at their regular hourly rate in addition to pay for any hours worked.

Exempt employees who are required to work on an Intersession closing day will be eligible for a floating holiday. Intersession floating holidays must be used by the end of the fiscal year and will not be carried over. In addition, Intersession floating holidays do not constitute vacation and will not be paid out upon termination of employment.

Floating Holidays for Non-Educational Staff

During The Guild School's Intercession holidays, residential programing and other essential functions will remain open or on call. "Other essential functions" include but may not be limited to nursing, school reception, school administration, admissions, facilities, finance, operations, and human resources. Department supervisors should ensure appropriate staffing of these functions during the Intersession break.

In lieu of intercession holidays, regular, full-time residential staff and other essential functions will receive up to 64 hours of Floating Holiday time annually. Any unused Floating Holiday time will be forfeited on June 30 of each fiscal year. Full-time employees

hired after July 1 receive prorated benefits.

Floating Holiday banks will be granted quarterly based on the following schedule:

- July 1: 16 hours
- October 1: 16 hours
- January 1: 16 hours
- April 1: 16 hours

Employees hired after the quarterly grant date will receive a prorated number of hours for that quarter.

Termination of Employment

Unused Floating Holiday time is not accrued, does not constitute vacation and will not be paid out upon termination of employment.

Notice and Scheduling

Employees are required to provide supervisors with reasonable advance notice and obtain approval prior to using Floating Holidays. This allows the employee and their supervisor to prepare for time off and ensure that all staffing needs are met.

Minimum Increments of Floating Holidays

Floating Holidays may be taken in hourly increments and may be combined with other leave.

Personal Time Off

The Guild expects regular attendance from employees but recognizes that unforeseen illness, personal emergency and non-work-related injury may occur. Accordingly, The Guild provides paid personal time off (PTO) to eligible employees. PTO provides employees the flexibility to use time off to meet personal needs. Personal Time should only be taken for personal reasons, which strictly excludes using them for or in conjunction with vacation time

Eligibility

All full- and part-time employees are required to provide medical documentation if they need to utilize this time before they have completed 90 days of employment. Part-time employees will earn paid personal time off in accordance with the laws in Massachusetts on earned sick time for part-time employees as set forth below.

Benefit

Regular full-time employees will receive 64 hours of personal time off each fiscal year. PTO banks will be credited on July 1. Any unused PTO time will be forfeited on June 30 of each fiscal year. Full-time employees hired after July 1 receive prorated benefits.

Part-time employees will accrue one hour of personal time every 30 hours following Massachusetts sick time earning law worked, up to a maximum accrual balance of 64 hours. Part-time employees may carry a maximum of 40 hours from the prior fiscal year into the new fiscal year but will cease accruals once they reach the 64-hour cap.

Personal time off may be used for any qualifying reason under the Massachusetts sick leave law, including to care for self or a covered family member when ill or injured, preventative medical care for the employee or a covered family member, to address certain physiological, physical or legal effects if the employee or a covered family member is a victim of domestic violence, or if the employee or spouse experience a pregnancy loss or a failed assisted reproduction, adoption or surrogacy.

Termination of Employment

Unused PTO will not be paid out upon termination of employment.

Minimum Increments of PTO

Employees may not take less than one hour of personal time off at a time.

Notice and Scheduling

Employees are required to provide their supervisor with reasonable advance notice and obtain approval prior to using PTO. This allows for the employee and supervisor to prepare for time off and ensure that all staffing needs are met.

To take personal time, employees must, as far in advance as is possible, notify their supervisor. An employee will not have been considered to have notified their supervisor until the supervisor has confirmed receipt, so one-way communication modes (texting, emailing, leaving of voicemail) is insufficient until the supervisor confirms receipt. If a supervisor is unavailable to confirm receipt, the employee should notify the next person up in their reporting structure. Unless otherwise instructed by the direct supervisor, an employee should provide notification each day they take personal time off. If an employee is absent three consecutive days due to injury or illness, a physician's note or other documentation may be required to return to work.

There may be occasions, such as sudden illness, when an employee cannot notify their supervisor in advance. In those situations, the employee must inform their supervisor of the circumstances as soon as possible.

For unscheduled personal time off, employees should notify and receive confirmation from their immediate supervisor as much in advance as possible. If sudden need arises, then employees must notify supervisors at the beginning of the regular business day or four hours prior to the start of their scheduled shift, if feasible.

When possible (for example, in the case of scheduled surgery) employees are asked to give advance notice to allow for appropriate scheduling and coverage. Employees should review the section of the Employee Handbook on employee leaves for further guidelines.

If an employee calls out on a scheduled day, they will be charged with personal and/or vacation time for the day. If an employee picks up an extra shift in the same week, they will be paid regular time for the first 40 hours and overtime for time more than 40 hours. Under no circumstance shall overtime be paid for the first 40 hours worked in each week. Personal time off will be calculated using hours as the primary unit (not days or half-days) for all staff, rounded to the nearest hour.

Anniversary Day

On each anniversary of a full-time employee's original hire date, an additional eight hours of paid personal time off will be granted. Anniversary Day time off must be approved by the employee's supervisor and must be taken between the anniversary date and the next anniversary date.

Administrative Leave

An employee may be placed on administrative leave, with or without notice, to permit The Guild to review or investigate circumstances that warrant removing the employee from the worksite. Administrative Leave may be paid or unpaid.

Health Benefits

Medical and Dental Benefits

The Guild offers medical and dental benefits to all eligible employees beginning from the first day of employment. These benefits are in the form of insurance or HMO coverage, depending on The Guild's current benefits program. Coverage is available for employees on either an individual or family basis, depending on eligibility. The Guild and each covered employee share the cost of these benefits in percentages that are determined from time to time and announced to employees. Each eligible employee may obtain a copy of The Guild's health plan summary booklet and/or governing documents from the Human Resources Department or online at the Employee Navigator.

Employees eligible for health insurance benefits must enroll within 30 days from their start date at The Guild and may change their coverage only during the annual election period or as required by applicable law. For example, if an employee or spouse changes employment status or experiences a significant life event, as defined in the plan, the

employee may also make appropriate changes in coverage at that time. An employee who does not wish to be covered by any of The Guild's health insurance programs must sign a statement to that effect (HIRD form), to be included in his or her personnel file. If it is determined that an employee covered by The Guild's health insurance plan is at the same time covered by a health insurance plan provided by his or her spouse's employer, then that employee must reimburse The Guild for all health insurance premiums paid by The Guild on that employee's behalf during the period The Guild's plan was duplicative.

An employee's share of health coverage costs may be funded with pre-tax dollars deducted directly from his or her paycheck. The Guild's share of health coverage costs will be tax free to each covered employee. The Guild will not contribute to the cost of an employee's health coverage while the employee is on certain leaves of absence or after employment has terminated. However, under federal law, employees on a leave of absence and employees who leave employment with The Guild for a reason other than gross misconduct have rights to continue participation (for themselves and their covered dependents) in The Guild's health coverage programs at their own expense.

Life and Disability Insurance Benefits

Employees are offered short-term disability protection as soon as they become eligible (there is a 90-day exclusion). If an employee declines short-term disability coverage, they may enroll during an annual enrollment period, subject to a 90-day waiting period. Subject to any eligibility rules imposed by the insurance carriers from time to time, employees may change their life insurance and/or disability insurance decisions only during the annual election period. Employees who change employment status or experience a significant life event, as defined in the insurance plans, may also make appropriate changes in life insurance coverage and/or disability insurance coverage at that time.

The Guild's share of life insurance coverage premiums will be tax free for each covered employee up to the cost of the first \$50,000 of coverage. The Guild will not contribute to the cost of an employee's life insurance coverage while the employee is on certain leaves of absence or after employment has terminated. Premiums paid by The Guild for life and long-term disability insurance may result in additional tax liability for the employee.

Dependent Care Assistance Plan and Flexible Spending

The Guild offers a Dependent Care Assistance Plan and Flexible Spending Account to employees who are eligible. Please contact the Benefits Administrator for more information.

Retirement Benefits

The Guild provides a retirement program for eligible full-time and part-time employees. All employees are encouraged to review the plan summary descriptions, which are provided at the time of employment, for details regarding this program. Temporary, seasonal or any employee who works fewer than 1,000 hours a year, is not eligible for this benefit.

Employee Savings

Eligible employees may make contributions to their retirement in a 403(b) tax-deferred savings plan. The Guild follows federal and state allowance for amount of savings. These savings are payroll deducted.

The Guild's Contribution

The Guild may or may not contribute to employee retirement funds. This is reviewed and determined through the annual operating budget process. Please see the Human Resources Department for current contribution information.

Employee Assistance Program

The employee assistance program (EAP) is a resource designed to provide confidential help for employees in dealing with issues that affect their lives. The Guild wants employees to be able to maintain a healthy balance of work and family that allows them to enjoy life. The EAP is a confidential counseling and referral service that can help employees successfully deal with life's challenges.

This free, comprehensive counseling service offers employees three visits per issue each year and a 24-hour hotline answered by professional, degreed counselors. For legal or financial issues, employees receive a 25 percent discount on any services that might be needed.

The company encourages employees to use this valuable service whenever they have such a need. Employees who choose to use these counseling services are assured the information disclosed in their sessions is confidential and not available to the company, and the company is not given any information on who chooses to use the services. For questions or additional information about this program, employees may contact the HR department.

Education Assistance Programs

The Guild supports employees' desire to further their education. The Guild provides financial assistance to eligible employees who attend or have attended externally

sponsored educational courses. Such support is intended to enhance employees' professional development and their skills and knowledge related to the work we do at The Guild. The Guild also wishes to support employees who are paying for or have incurred student debt related to education for their dependents.

Eligibility

Active employees must have six months of satisfactory employment at the time of application and must work at least 20 hours per week on a regularly scheduled basis (part-time staff will be eligible for prorated benefits).

- Only those courses or degree programs that, in the opinion of The Guild, contribute to the development of skill or knowledge applicable to an employee's job responsibilities at The Guild will be eligible for reimbursement under this policy.
- The employee must receive a grade of C or better to receive reimbursement.

Types of Assistance

Assistance when approved is given in the form of student loan repayment or tuition reimbursement. The benefit may be taxable.

- Student loan repayment program: Employees must present documentation of outstanding loan balance for attendance at an accredited degree-granting institution or program through an authorized school tuition lender.
- Tuition reimbursement program: Courses taken at accredited academic institutions will be eligible for consideration. Correspondence courses or online courses will be considered for reimbursement only from accredited academic institutions and only when they are determined to be equivalent or superior to comparable on-site instruction.

Amount of Benefit

Maximum benefit amounts are determined annually, based on length of service and subject to a lifetime maximum. For fiscal year 2025 the maximum of all tuition assistance benefits are by tenure as follows:

- 6 months – 2.99 years - \$1,000
- 3 years – 4.99 years - \$2,000
- 5+ years - \$3,000

Lifetime benefits for student loan and tuition reimbursement will be capped at \$25,000. Employees who receive tuition assistance under the Critical Staffing and Pursuit of Excellence programs are not eligible to receive student loan repayment benefits or additional tuition assistance.

Termination of employment

All educational assistance payments will cease immediately upon an employee's voluntary or involuntary termination from employment with The Guild or change in

eligibility status, such as a reduction in hours.

Payback Agreement

As a condition of receiving educational assistance, the employee must agree that if they voluntarily or involuntarily leave The Guild, the employee will repay The Guild the full amount of any educational assistance received during the 12-month period preceding the employee's termination date. This payback agreement will not be enforced in situations where the employee's position is eliminated.

Critical Staffing

At its discretion, The Guild may provide additional educational benefits to ensure staffing of certain mission-critical positions. Employees pursuing a Massachusetts teacher certification and certain professional licensures in an accredited program may be eligible to receive additional assistance through a grant/scholarship program.

Pursuit of Excellence Scholarship Program

The Pursuit of Excellence Scholarship Program established by The Guild's Board of Trustees in 2025, awards a limited number of full Tuition scholarships to qualifying Guild employees pursuing graduate degrees or certificates. Details are available in the Human Resources Department. Any additional benefits must be approved in advance by the chief executive officer.

Meals

Weekday noon-time meals are available to all employees who work at 521 Virginia Road Monday through Friday. Breakfast, lunch, and dinner are offered free of charge to residential staff on duty at times meals are served.

Meal Break Law and Waiver Option

Employees in the Commonwealth of Massachusetts are entitled by law to a 30-minute **unpaid** meal break for every consecutive six hours worked in a day. To accommodate certain coverage needs, employees may agree to waive this meal break when working on a scheduled shift. It is the employee's free choice to waive a meal break. If an employee waives this break and continues to work, that time will be paid.

Upon hire, employees providing direct care will be provided with a waiver if they choose to forgo the unpaid break. Employees are free to change their status for meal breaks at any time. If an employee decides to waive the meal break but then changes their mind, the employee must notify the direct supervisor as soon as possible to plan for appropriate coverage.

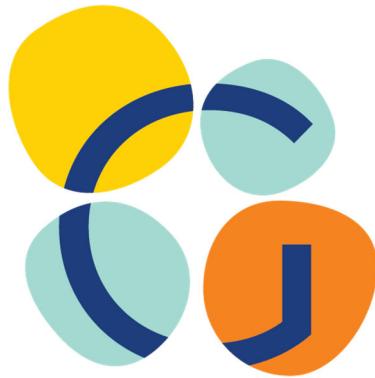
If an employee chooses to waive this meal break they must complete the waiver form and return it to their supervisor and Human Resources Department. If an employee chooses to waive the break, but then revokes the waiver, a new waiver will need to be signed in the future.

Workers' Compensation

Pursuant to state law, employees are covered by workers' compensation insurance for job-related illnesses or injuries. Workers' compensation insurance pays all medical costs and a portion of the employee's regular pay for all approved claims in accordance with Massachusetts law. All employees are eligible for this benefit from the date of employment.

An employee who sustains an accident or injury at work must report the incident to their supervisor as soon as possible. If the claim is approved, The Guild's workers' compensation insurance will pay for the treatment. Claims denied under workers' compensation may be covered by short-term disability insurance if the employee is enrolled in the short-term disability plan. Employees who desire specific information about filing for workers' compensation should contact the Benefits Administrator. Accident reporting forms are available in the Human Resources Department and in each residence.

All claims of work-related injury or illness will be investigated thoroughly. An employee who makes a fraudulent claim will be discharged.



Section VI: Workplace Policies

Attendance

Attendance is a key factor in job performance. Employees are expected to arrive at the job promptly and to be prepared for their assignments at the beginning of their work shift. Employees who are absent from work for any reason or plan to arrive late or leave early are expected to notify and receive confirmation from their immediate supervisor as much in advance as possible. For all absences extending longer than one day, employees must telephone their immediate supervisor prior to the start of each scheduled workday. A physician's statement may be required as proof of the need for any illness-related absence in accordance with applicable law. If sudden need arises, then employees must notify supervisors before the beginning of the regular business day or four hours prior to the start of their scheduled shift. The Guild School begins business at 8 a.m.

Residential day shifts begin at 7a.m. Advance notice will assist in finding a replacement for the absence. Voicemail and email are not acceptable forms of notification when calling out of work.

Employees with a record of excessive tardiness or absenteeism or with a pattern of absenteeism prior to or following scheduled days off, weekends or holidays will be subject to disciplinary action. Except as provided in other policies, employees absent from work for three or more consecutive days without notifying their supervisor will be deemed to have voluntarily resigned. The employee's final paycheck will be mailed to the last mailing address on file with The Guild.

If the employee is unable to contact the worksite for any absence, he or she should ask a representative (such as a family member or friend) to do so on the employee's behalf. If the employee or a representative is unable to contact The Guild due to extreme circumstances (such as a medical emergency or natural disaster that prohibits the employee or his or her representative from contacting the organization within three days), the employee or his or her representative must contact The Guild as soon as practical to explain the situation. In extreme circumstances, the employer will consider the explanation and its timing before determining if the voluntary resignation will be upheld.

If a work site has a crisis occurring, staff must stay until the situation is resolved. Staff will also be required to stay until the next shift arrives or replacement staff who have been called in by the supervisor or director. The residence or school must be staffed adequately to ensure the safety of the individuals served and other staff in all situations.

Excessive absences, tardiness or leaving early will be grounds for discipline up to and

including termination of employment. Depending on the circumstances, including the employee's length of employment, The Guild may counsel employees prior to termination for excessive absences, tardiness or leaving early.

Inclement Weather

The Guild serves residents 24 hours per day, 365 days per year. The Guild remains open regardless of weather conditions. As such, all employees are expected to come to work. If weather conditions appear to exist that make transporting individuals served hazardous, the chief executive officer (or designee) may cancel The Guild School's academic program. At that time, the chief education officer (or designee) will assign The Guild School staff to support students in residences. Decisions related to early closing of school will be made by the chief education officer or designee.

In the event individuals' day or work programs are cancelled, staff on duty must remain at the residence until they are relieved by incoming staff.

The chief executive officer or designee may close The Guild's administrative offices due to inclement weather. If the Commonwealth of Massachusetts designates a state of emergency and driving ban, office personnel will not need to report to work. Essential personnel (those responsible for supervision of individuals served) must make all efforts to report to work, even in a state of emergency. The Guild will utilize every available measure to support staff safety when a driving ban is in place.

Secondary Employment

Individuals employed by The Guild may hold outside jobs if they meet the performance standards of their job with The Guild. Employees should consider the impact that secondary employment may have on their ability to perform their duties at The Guild. All employees will be evaluated by the same performance standards and will be subject to The Guild scheduling demands, regardless of any outside work requirements. For this policy, secondary, part-time positions in other Guild programs are considered "outside employment" and are subject to the same scrutiny as work outside of The Guild.

If The Guild determines that an employee's outside work interferes with their job performance or their ability to meet the requirements of his or her primary job at The Guild (which may be modified from time to time), the employee may be asked to terminate the outside employment if s/he wishes to remain employed with The Guild or The Guild may elect to terminate employment. Such interference includes calling out absent from the primary job to work at secondary employment.

Outside employment that constitutes a conflict of interest is prohibited. Employees may not receive any income or material gain from individuals or organizations for materials produced or services rendered while performing their jobs with The Guild.

English Proficiency

For the health and safety of the individuals in our care, proficiency in written and spoken English is an essential function of all jobs. Unless otherwise specified due to student, resident or guardian needs, all methods of communication with individuals, their guardians and family members, and co-workers while performing job-related duties are to be conducted in English, which is the language of instruction. The Guild may administer English proficiency exams as part of employment at The Guild.

Drugs and Alcohol

The Guild is committed to maintaining a drug- and alcohol-free workplace. Toward this goal, The Guild will adhere to the following:

- All Guild school facilities will be free of the use of alcohol and controlled substances, including legal, illegal and prescription drugs being used without medical supervision. See Human Resources if taking prescription medication that may impair ability to safely perform job duties.
- All Guild adult residences will be free of the use of controlled substances, including legal, illegal and prescription drugs being used without medical supervision. Alcohol may not be consumed by staff in these residences but may be consumed by individuals who reside in the home if determined to be safe by their treating physician and with the consent of their guardian.
- The unlawful manufacture, distribution, sale possession or use of a controlled substance on Guild premises (including Guild-owned vehicles) or while conducting business on behalf of The Guild is absolutely prohibited.
- Reporting to work under the influence of or impaired by alcohol or a controlled substance is strictly prohibited. As a condition of continued employment, employees convicted of or pleading guilty to (including pleas of no contest) a controlled substance-related violation in the workplace must inform the Chief Executive Officer (or designee) within five days of such conviction or plea. The Chief Executive Officer will have discretionary decision-making ability to suspend employment or require continuing documentation to remain employed.

Violations of this policy will result in immediate termination or other appropriate disciplinary action.

Corporate Compliance Program

Purpose

The Guild provides quality, cost-effective services to the people served. This Corporate Compliance Program is developed to provide guidance to all employees, contractors and members of the Board of Trustees in following all federal, state and local laws and regulations. The Corporate Compliance Program is developed to demonstrate The Guild's commitment to ethical and legal behavior, as well as honest and responsible provider conduct. This plan, the Employee Handbook and The Guild's program policies communicate the specific standards of expected conduct to all responsible parties.

Scope of the Corporate Compliance Program

The Corporate Compliance Program is designed to identify, prevent, reduce and correct violations of legal or ethical conduct. The essential fundamental elements of the Corporate Compliance Program include the following:

- Implementation of written policies, procedures and standards of conduct and adherence to the Code of Ethical Conduct.
- The designation of a corporate compliance officer.
- Establishing and maintaining an effective system for lines of communication, including receiving reports of waste, fraud, abuse and other wrong doing.
- The development and implementation of regular, effective education and training for all employees, board members and contractors, including the role of the corporate compliance officer, and The Guild's procedures for allegations of fraud, waste, abuse and other wrong doing.
- Conducting internal monitoring and auditing of areas including, but not limited to, the following:
 - Fair labor practices.
 - Billing for services.
 - Conflicts of interest.
 - Enforcing standards through well-publicized disciplinary guidelines.
 - Establishing a system for investigation and responding promptly to detected offenses and undertaking corrective actions of identified problems or abuse.

Procedures for Corporate Compliance

All Guild employees, volunteers and contractors are required to follow all applicable laws, regulations and Guild policies. All new contractors and employees will be educated about and receive written materials related to The Guild's standards and expected ethical conduct.

Every employee and volunteer will be given the opportunity to read, receive needed clarification and sign the Employee Handbook, which includes information about the role of the Chief Compliance Officer, Whistleblower policy, Waste, Fraud, Abuse and other

Wrongdoing policy and procedures, Code of Ethical Conduct policy, and Confidentiality statement.

The Guild will not tolerate violations of the Code of Ethical Conduct policy and procedure, or activities that are in violation of federal, state, or local laws or regulations.

Through the Corporate Compliance Program, The Guild seeks to do the following:

- Empower all responsible people to prevent, detect, respond and resolve violations of legal or ethical behavior conducted at or on behalf of The Guild.
- Assure that quality services are provided to people served.
- Establish systems that allow responsible parties to raise concerns about compliance issues without fear of retribution.
- Provide oversight for the resolution of any identified problems or potential problem areas.

Agency Designations

To implement The Guild's Corporate Compliance Program, the Corporate Compliance Officer will be accessible to all Guild board members, employees, volunteers and contractors. The Corporate Compliance Officer will do as follows:

- Develop a system to respond to allegations of illegal and/or improper activities.
- Create procedures to ensure access for people to make confidential and/or anonymous reports to The Guild's chief executive officer and board related to reports received or identified areas of concern. This information may be provided to the Board in open session, or closed session as allowed by law in the following circumstances:
 - To consult with an attorney
 - To hear or investigate a complaint or charge against a contractor or employee
 - To hear reports concerning alleged criminal conduct
- Provide leadership for the Incident/Accident Investigation Committee (IAIC) and Safety Committee.
- Assist with development of educational program for all existing and new contractors and employees.
- Identify, prevent and correct systemic problems.
- Coordinate the use of audits and/or other techniques to monitor compliance and assist in the reduction of identified problem areas.
- Monitor matters pertaining to corporate compliance.
- Conduct corporate compliance risk assessments.
- Report on matters pertaining to corporate compliance.

The Guild's Program Leadership Team, IAIC, Emergency Preparedness Committee and Safety Committee have the following responsibilities:

- Develop and assist in the implementation of the Corporate Compliance Plan.
- Assess The Guild's existing policies and procedures that address risk areas.

- Recommend and monitor the development of internal systems and controls to carry out The Guild's standards.
- Develop and refine the system to solicit, evaluate, and respond to complaints and problems.

Employee Protection Whistleblower Policy

This policy encourages staff and volunteers to come forward with credible information on illegal practices or serious violations of adopted policies of The Guild, specifying that The Guild will protect the person from retaliation and identify where such information can be reported.

Encouragement of Reporting

The Guild encourages complaints, reports or inquiries about illegal practices or serious violations of The Guild's policies, including illegal or improper conduct by The Guild itself, by its leadership or by others on its behalf. Appropriate subjects to raise under this policy would include financial improprieties, accounting or audit matters; ethical violations; abuse or neglect of a student or individuals we support; or other similar illegal or improper practices or policies. Subjects on which The Guild has existing complaint mechanisms should be addressed using those protocols, such as raising matters of alleged discrimination or harassment via the Human Resource Department, unless those channels are themselves implicated in the wrongdoing. This policy is not intended to provide a means of appeal from outcomes in those other mechanisms.

Protection from Retaliation

The Guild prohibits retaliation by or on behalf of the agency against staff or volunteers for making good faith complaints, reports or inquiries under this policy or for participating in a review or investigation under this policy. This protection extends to those whose allegations are made in good faith but prove to be mistaken. The Guild reserves the right to discipline people who make bad faith, knowingly false or vexatious complaints, reports or inquiries or who otherwise abuse this policy.

Where to Report

Complaints, reports or inquiries may be made under this policy on a confidential or anonymous basis. They should describe in detail the specific facts demonstrating the basis for the complaints, reports or inquiries. They should be directed to The Guild's chief executive officer or chair of the Board of Trustees. If both of those people are implicated in the complaint, report or inquiry, it should be directed to The Guild's Board clerk. The Guild will conduct a prompt, discreet and objective review or investigation. Staff or volunteers must recognize that The Guild may be unable to evaluate fully a vague or general complaint, report or inquiry that is made anonymously.

Conflicts of Interest

Employees may not engage in any business or financial activity or practice that may conflict with the interests of The Guild. A conflict of interest may arise when an employee is placed in a position in which outside business relationships or other business or financial interests may, in the judgment of The Guild, have an adverse effect on the employee's job performance or may otherwise adversely affect the interests of The Guild. In order to avoid conflicts of interest, employees must obtain the written consent of the chief executive officer to engage in any activity as an officer, director, employee, contractor, supplier or consultant with any enterprise that competes or does business with The Guild.

Guardianship of Individuals Served

To avoid any potential conflicts of interest, The Guild strictly prohibits all employees from accepting an appointment as guardian of any current individuals served.

Political Activity

In accordance with federal law, federal funds cannot be used for partisan political purposes of any kind by any person employed in connection with federally assisted programs. Accordingly, The Guild prohibits any political and/or lobbying efforts or activities in the workplace. Employees must adhere to the following guidelines:

- Employees may not involve The Guild in political activities and/or lobbying efforts during or outside of work hours.
- Employees are not to use Guild materials, equipment or letterhead to aid political campaigns, efforts or organizations.
- Employees are not to use Guild affiliations to aid political campaigns, efforts or organizations.
- Employees are not to distribute literature, post flyers or solicit signatures or money to aid political campaigns, efforts or organizations during work hours or in the workplace.

Any violation of these guidelines set forth may result in disciplinary action up to and including termination of employment.

The Guild recognizes that employees may want to involve themselves as individual citizens in the political process. However, any activity of this nature must take place on the employee's own time and at his or her own expense.

Gifts and Gratuities

The Guild expects its employees to exercise objectivity and good judgment in dealing with The Guild's vendors, suppliers, contractors and agencies. No employee shall accept any gift or gratuity from any person or entity doing business or seeking to do business with The Guild without prior written disclosure to and written approval from the

Advancement Office. Employees are not prohibited, however, from accepting advertising novelties such as pens, pencils, calendars, coffee mugs or other gifts of nominal value (less than \$25) when the gift has not been solicited and is not being made in return for special consideration, favor or decision. Employees should notify the Advancement Office of any gifts or donations given so that The Guild can acknowledge the gift and provide a receipt to the donor.

Solicitation

To prevent disruption of our operations, ensure a productive working environment and create a caring environment for our clients, we have established the following rules governing the solicitation of individuals and the distribution of materials on The Guild premises. It is the policy of The Guild to prohibit solicitation and distribution on its premises by any person except in accordance with the rules outlined below.

Definitions

“Working time” does not include authorized lunch or break periods, or any other specified non-working periods of the day when employees are not in the presence of individuals served or parents/family members or when not expected to be performing job duties or responsibilities, whether such non-work periods are paid or unpaid.

“Working areas” include those areas where employees perform their job duties or responsibilities but do not include locker rooms, employee-only rest areas, employee-only lounge areas or other such non-working areas.

Solicitation of Employees by Other Employees

Employees are permitted to engage in solicitation that is not directly related to work assignments only under the following conditions:

- An employee may not solicit another employee, for any purpose, when either is on working time.
- Solicitation is prohibited in all areas devoted to immediate care of individuals served even during non-working time. These include any area that is used primarily for the care of clients and in which individuals served, or their parents/family members are present, including the hallways, corridors and elevators adjacent to such areas.

Distribution of Materials by Employees

Because we must keep working areas clean and free of litter, employees are permitted to engage in distribution of literature or material that is not directly related to their assigned work only under the following conditions:

- Employees may not distribute any literature, notices or other material to other employees, for any purpose, at any time, in working areas or when either is on working

time, regardless of location. Any such activity must take place in non-working areas of The Guild when both employees are on non- working hours.

- Distribution of literature, notices or other material is prohibited in all immediate client-care areas.
- Employees may not solicit for any third-party organizations (e.g. Girl Scouts, Avon, Tupperware, etc.) or participation in charity events (e.g. Walk for Hunger, American Cancer Society, etc.).

Posting of Materials by Employees

In each office, The Guild maintains bulletin boards for legal notices only. Employees may not post written materials on these bulletin boards.

Non-Employees

People not employed by The Guild are prohibited from soliciting, distributing or posting any literature, notices or other material or selling any item to anyone anywhere on Guild property for any purpose at any time. Employees of The Guild may not solicit non-employees on Guild property, distribute any literature, notices or other materials to non-employees on Guild property, or sell any item to a non-employee for any purpose or at any time. Supervisors and managers have the responsibility to inform such non-employees of these rules, pointing out posted signs and, if appropriate, politely but firmly asking such people to cease their actions and leave the premises or area. If non-employees refuse to cease such activity, contact the Human Resources Department or the division's chief officer.

Official Programs

This policy is not intended to prevent The Guild from carrying on its normal community relations and employee relations programs, which may, from time to time, involve management approval of distributions and solicitations on Guild premises. Programs that have been approved as appropriate recreational or developmental activities for those individuals in our care will continue to be communicated in accordance with established practice.

Offensive Materials

Distributing or selling literature or material that is in any way offensive, harassing or discriminatory is not allowed.

Undue Pressure

If an employee experiences undue pressure from solicitation of any kind, contact a supervisor or the Human Resources Department immediately.

No Smoking

Due to federal and state regulations, The Guild is a smoke-free facility. Smoking is not allowed in any facility of The Guild or at any time in the presence of students or individuals served. This policy includes all residences of The Guild and 521 Virginia Road. Violation of this policy will result in disciplinary action that could lead to termination of employment. Adults who receive residential services may have a designated area where smoking is permitted on the grounds of each location can be found at each location.

Leaving The Guild

Employees who decide to leave The Guild should provide their supervisor with at least two (2) weeks' advance notice of departure. The Guild reserves the right to accelerate an employee's separation date notwithstanding the amount of notice given and will pay an employee only through their last day of work.

All Guild property including, but not limited to, keys, security cards, cell phones, laptop computers, etc., must be returned at separation. To the extent permitted by law, employees will be required to repay The Guild (through payroll deduction, if lawful) for any lost or damaged Guild property. As noted previously, all employees are employed at will and nothing in this handbook changes that status.

Employees who leave The Guild will be paid for any accrued and unused vacation time earned through the last completed month prior to the date of termination at the rate of pay in effect for their position as of the date of departure. During the resignation period employees may only use accrued time for a documented medical reason.

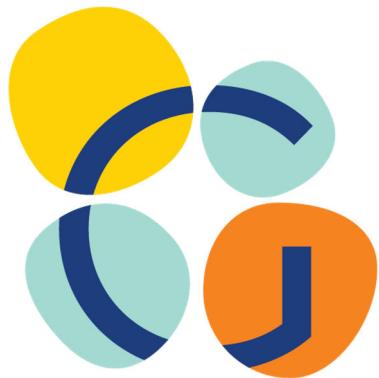
Returning employees or employees switching back to full-time will receive service credit in accordance with the Employee Service Credit policy.

Exit Interviews

The Guild will offer exit interviews to employees upon completion of their employment. At the interview, The Guild will provide information regarding an employee's right to continue health insurance benefits, procedures regarding 403(b) plans (if applicable) and other relevant topics. Employees will have the opportunity to suggest ways The Guild can improve its management, training or other functions.

All property of The Guild must be turned in to the employee's immediate supervisor on the final day of employment, including staff identification badges, keys and any other

property of The Guild. If this is not done, the employee will be charged for the property in their possession.



Section VII: Personal and Guild Property

Use of The Guild's Facilities

The Guild's vehicles, equipment, materials and supplies are to be used only in connection with The Guild's business. Similarly, The Guild's facilities, including the cafeteria, residences and outside grounds, are to be used only for The Guild's business or The Guild-sponsored events or in adult residences for activities planned by the individual residents of the home. Employees may not use these facilities for parties, political fundraising events or other private functions. Incidental personal use of The Guild's vehicles will be considered on a case-by-case basis by the Chief Executive Officer.

Maintenance of Work Areas, Residences and Vehicles

The Guild places a high priority on keeping all premises and vehicles orderly and clean. All employees should attempt to keep work areas, residences and vehicles always clear of debris and clutter. Employees should notify the director of facilities of any ongoing or hazardous conditions as soon as possible, as well as any damage or repairs needed.

Use of Information Technologies and Systems

General

The Guild's email, voicemail, telephones, fax machines, mail facilities, photocopy machines, Internet access and computer network are property of The Guild and are for business use. Email and voicemail messages, Internet communications and computer files are part of The Guild's business and client records and are not to be considered personal records. Employees have no expectation of privacy when using The Guild's technologies and systems. The Guild reserves the right to have authorized personnel monitor, review, track, record and copy all use, messages, communications and files to ensure security, to deal with technical and business issues, and to prevent abuse. System activity will be monitored for these and other lawful purposes.

Everyone must use The Guild's electronic communications and equipment systems in a responsible, professional and ethical manner. Use of such facilities for purposes inconsistent with The Guild's policies or in violation of the law is not permitted and can be a basis for disciplinary action. Prohibited activities include copyright infringement; invasions of privacy; and displaying or transmitting obscene, threatening, racist, sexist, discriminatory or harassing messages or materials. If an employee receives a communication containing material the employee deems to be offensive, please report it immediately to the chief executive officer or the chief financial officer. Do not delete or forward it.

The Guild strongly discourages personal use of these systems. Business uses take priority

and may require restrictions on personal use in addition to those described in this policy.

Archives

All electronic files of The Guild, including email messages, are archived regularly. Most text and data that has at any time been entered into The Guild computer network can be retrieved.

Users should realize that technology exists that makes it possible to restore some email messages and documents that the user believes have been deleted. A deleted text lingers in the computer's memory until the space it occupies is written over, which happens randomly.

All electronic files, including email, may be subject to discovery and disclosure by adverse parties in litigation. All electronic files, including email, are available to The Guild's management.

Internet

Internet access at The Guild is available at the desktop. The Internet offers unique opportunities for finding information but is not risk free. Users should be aware of the following:

- Materials available through the Internet vary greatly in quality. Unless material is obtained from a known and reliable source, do not assume that Internet materials are accurate, complete or up to date.
- Internet communications through websites, bulletin boards and the like are not private and should not be used for private communications.
- To avoid viruses and other drains on our system, never download any software from the Internet without the approval from the chief financial officer or designee.
- The Guild's security systems are designed to protect The Guild's records only. The Guild is not responsible for the security of Internet transactions and communications.

Other

To avoid system malfunctions, do not install software of any kind, including screen savers, games or any hardware, without approval from the Chief Financial Officer. Because The Guild's software is used under licenses, do not copy any of The Guild's software for any purpose.

The Guild recognizes, however, that there may be occasions when employees must make personal use of such equipment. Such use should be kept to a minimum and must not interfere with the employees' work. Residential phone calls, both incoming and outgoing, should be limited to five minutes.

Abuse of The Guild's email, voicemail, telephones, fax machines, mail facilities, photocopy machines, Internet access and computer network for personal reasons may

result in disciplinary action. Employees should reimburse The Guild for all personal long-distance calls and fax transmissions, postage and photocopies.

Guidelines for Social Media

Social networks and other online media are popular modes of engagement and two-way communication. Social networks provide great tools that aid communication, outbound marketing, education and collaboration with others. Given the nature of social networking, two-way and real-time communications, these forums introduce the potential for significant risks associated with inappropriate use. Following guidelines and training, as well as using sound common sense and professionalism, can minimize this risk. The Guild relies on employees to ensure the trust and support of the communities it serves. While The Guild encourages the use of social networking to enhance open communications with several key audiences, we expect these communications will reflect the highest standards of our institution and support the privacy and trust of our students, clients and partners.

Responsibilities

- Follow all applicable policies. This includes, but is not limited, to policies regarding maintaining client confidentiality, professionalism, conduct, ethics, sexual harassment, responsible-use standards, social networking site guidelines, copyright, and intellectual property.
- There is no such thing as a truly "private" social media site: Search engines can turn up posts years after the publication date, comments can be forwarded or copied, and archival systems save information even if the post is deleted.
- Be respectful and professional.
- Do not post derogatory comments about any of these groups or anyone else.
- Do not post work-related information that may compromise organizational practices, client privacy, respect for children and families or security. Take care not to violate intellectual property, copyright or trademark regulations.
- Employees are responsible for their posts on personal sites and those of others.
- Cite and link to sources whenever possible. Correct errors quickly and visibly.
- Use good judgment and strive for accuracy in communications. Errors and omissions may result in liability for the employee.

Transparency

- Use Guild affiliations appropriately. When an employee's connection to The Guild is apparent, make it clear that the employee is not speaking on behalf of The Guild. If communicating institutional information through an official channel of The Guild (the official Facebook page, for example), do so only as approved by the chief advancement officer or the chief executive officer.
- If communicating publicly in an official capacity on the Internet about Guild matters, disclose title and role.

Protection of Private Information

Posting, releasing or otherwise disclosing photos, identifiable case descriptions, images, or records on social media of the educational, clinical or research activities of The Guild is prohibited.

Personal Accounts

- For any personal online activity, use a personal email address (not Guild email address) as primary means of identification. Just as an employee would not use Guild letterhead for a letter to the editor with personal views, do not use Guild email address for personal views. Similarly, please review the Computer Use policy as it pertains to use of The Guild's computer and network resources for non-Guild use.
- Discussions regarding The Guild's clients, research studies and other protected and proprietary information are prohibited, even if all identifying information is prohibited.
- Under no circumstances should photos of individuals served be displayed unless specific written permission to do so has been obtained and submitted in advance to the chief advancement officer or the chief executive officer.
- If identified as a member of The Guild community via personal social media presence(s), employees should clarify that views expressed are individual, not a formal representation of The Guild.
- Do not conceal personal identity for the purpose of promoting The Guild through social media.
- It is strictly forbidden to use The Guild's name to promote or endorse any product, cause, political party or candidate.
- Avoid conflicts of interest and maintain a distinction between personal identity and professional identity represented on behalf of The Guild.

Parking

The Guild makes available certain parking areas, as its resources permit, for the use of employees. When the number of parking spaces is limited, factors such as an employee's travel requirements and seniority may be considered in deciding which employees are permitted to park in The Guild's parking areas.

At 521 Virginia Road, employees may park in any space except the ones marked handicapped (unless the employee has a handicapped placard), Reserved (for Bay Path University) or admissions visitor. At each residence, The Guild vehicle is always parked in the driveway.

The Guild is not responsible for damage to personal property, including vehicles. Park at own risk. In the rare circumstance that a personal vehicle parked at The Guild's site is damaged by an individual served by The Guild, the Human Resources office or their designee will investigate the situation and determine if The Guild can offer reimbursement for repairs. If approved, The Guild will reimburse employees the cost of their reimbursement or deductible up to \$750, whichever is less. Proof of payment or insurance will be required. The Guild will only cover the cost of repair or deductible and will not reimburse any additional transportation costs incurred because of the required repairs.

Other vehicles may also park in the driveway, as space permits. Local parking laws must be observed. Parking tickets are the responsibility of the individual parking the vehicle. The Guild does not reimburse for traffic violations.

A Parking Memo is posted at each residence with specific guidelines relating to parking at that or other residences. This memo applies to staff, families and visitors. This is to promote good relations with neighbors and comply with city/town regulations.

Guests and Visitors

All visitors to The Guild must sign in at one of the lobby areas upon arrival and sign out when leaving. The same procedure is in place at youth homes. Small children must be supervised appropriately while at Guild facilities. All visitors must receive and wear a visitors' badge at 521 Virginia Road. Employees should escort all visitors who are not wearing a badge to the lobby areas to receive a badge.

Electronic Device Use

There shall be no cell phone or electronic device use, including text messaging, when transporting individuals served or when driving a vehicle of The Guild, even if no individuals served are present. If it is necessary to use a cell phone or electronic device in the event of an emergency, the driver should pull over to the side of the road before placing the call.

Personal cell phone or electronic device use is not allowed during work shifts when staff are responsible for supervising individuals served. The use of these devices may distract staff from their primary responsibility, which is making sure the individuals we serve are safe. Personal cell phones or electronic devices must be kept out of sight while staff are

responsible for individuals served. They may not be clipped onto a staff members' belt, for instance, because this is a safety risk and increases the likelihood that the item will be damaged. The Guild will not reimburse employees for damage to personal cell phones or electronic devices.

To avoid disruption to co-workers and business activities, all employees of The Guild must turn off their personal cell phones and electronic devices during staff training or other meetings of The Guild.

Where job or business needs demand immediate employee access, a business cell phone and/or two-way radio may be issued. For business and tax reasons, the personal use of such equipment is not permitted. Phone records may be audited for compliance.

Employees in possession of The Guild cell phones are expected to protect the equipment from loss, damage or theft. Upon resignation or termination of employment, or at any time upon request, the employee must return the equipment.

The Guild-Issued Cell Phones

The Guild may issue cell phones to employees whose jobs require them to make calls while away from work or require them to be accessible for work-related matters. Cell phones issued by The Guild remain property of the organization. Employees must comply with The Guild's requests to make their The Guild-issued cell phones available for any reason, including upgrades, replacement, or inspection. Employees who leave The Guild for any reason must turn in their The Guild-issued cell phones.

Personal Use of The Guild-Issued Cell Phones

The Guild-issued cell phones are to be used only for business purposes. Employees are prohibited from downloading apps (free or otherwise) that are not necessary for business-related functions. If an employee would like to download an app to perform job duties, please seek written approval from the appropriate division's chief officer. In some instances, The Guild may require installation of certain apps.

Security of Guild-Issued Phones

Employees are responsible for the security of Guild-issued cell phones and the information stored on them. Employees must keep Guild-issued cell phones on their person when traveling. They shall not be left unattended anywhere, including cars and hotel rooms. If a Guild-issued cell phone is lost or stolen, notify the Finance Department immediately. Never store confidential information on a cell phone, including protected health information, proprietary materials or human resources documentation.

When using a cell phone, remember that conversations are not necessarily private. Those in surrounding areas can hear all or portions of the conversation. To protect the

confidentiality of The Guild's information, please make cell phone calls in a private place. Cell phone transmissions may be intercepted. For this reason, employees should not conduct highly sensitive or confidential conversations by cell phone. Questions about what types of conversations are appropriate for a cell phone and which are not, please consult with the division's chief officer.

All The Guild-issued mobile devices, including cell phones, must be password protected and encrypted in accordance with the Health Insurance Portability and Accountability Act (HIPAA) technical standards.

Text Messaging

Text messaging is not a secure form of communication. Text messaging may result in loss or theft of protected health information. As such, The Guild does not permit staff members to send text messages to clients, in accordance with HIPAA privacy rules. In the event that a client provides explicit directions to communicate in this format, The Guild staff members will be permitted to schedule appointments or convey other non-clinical information in text messages to that client only. This form of text communication is allowed only with the written consent of the client for a time-limited period and is subject to revocation upon request of the client or The Guild at any time.

Overtime Rules

The Guild's overtime rules apply to any type of work done after hours, including using a The Guild-issued cell phone to make business calls. All overtime work -- including such work-related calls -- must be approved in writing in advance. Working overtime without permission violates The Guild policy and may result in disciplinary action.

Using Personal Cell Phone for Business:

Employees may not use their own personal cell phones to make business calls. At no time should clients have an employee's personal cell phone number. If any employee's job requires a cell phone to perform job duties, please talk with the manager to access a Guild-issued cell phone, landline or other approved technology for communication.

Employee Safety and Personal Property

The Guild strives to maintain a safe and secure work environment. Toward this goal, an employee should keep his or her work area safe and clean and should promptly report all unsafe conditions, accidents or other damage to their immediate supervisor or the director of facilities. Further, employees should notify a supervisor if they see any unfamiliar individuals in the workplace.

The Guild assumes limited liability for damaged personal items (see Expense and Damage Reimbursement policy). Employees are encouraged to leave valuable personal property at home. Personal property that employees bring to work such as

wallets and purses should be stored in a safe place.

Expense and Damage Reimbursement

The Guild will reimburse employees for reasonable and necessary out-of-pocket expenses incurred in connection with required or authorized travel, including attendance at approved conferences, conventions, seminars and other educational functions. Reimbursable expenses include transportation, meals, lodging and registration fees, and conference materials. All expenses must be substantiated with receipts. All reimbursement requests must be received within 15 days of the end of the month of the incurrence to be reimbursed or the request may be denied.

Employees required to use their personal car for The Guild business (other than commuting to and from work) will be reimbursed at The Guild's current rate per mile to cover the cost of gasoline, oil depreciation and insurance. They also will be reimbursed for parking fees and tolls with receipts. Mileage sheets must be turned in within 15 days of each month's end, or the request may be denied. Any fines incurred by an employee due to driving or parking violations are the responsibility of the employee and are not reimbursable. All claims for reimbursement must be approved by the employee's immediate supervisor before they are submitted to the director of human resources for payment.

Employees should be aware of the inherent risk involved when wearing certain types of clothing or jewelry (see Personal Appearance policy). The Guild will reimburse employees in the following amounts for the damage or destruction of their personal property by individuals served during the employee's performance of day or residential duties:

Prescription Eyeglasses

The lesser of the actual costs of repair or replacement shall not exceed \$200 for frames. The lesser of the actual costs of repair or replacement of lenses not to exceed \$150. This is a one-time reimbursement per fiscal year. Eye examinations are excluded as a reimbursable expense as related to the replacement of eyeglasses that are damaged or destroyed.

Each Single Article of Clothing

The lesser of the actual cost of repair or replacement or \$50. The damaged article must be turned in to the supervisor prior to reimbursement.

Personal Electronic Devices

The use of personal electronic devices is prohibited (see Electronic Device Use policy), therefore The Guild will not reimburse employees for damages to their personal electronic devices.

For Personal Vehicle Damage see Parking Policy

Requests for Reimbursement

To qualify for reimbursement for damages to personal property, the incident that caused the damage must be reported, in writing, within three working days to the employee's immediate supervisor and the director of human resources.

The damaged or destroyed item must be turned in to the Human Resources Department when requesting reimbursement. Repairs or replacements must be completed within 30 days from the date of confirmation of the incident by the director of human resources. Subsequent requests for reimbursement for damages to personal property as outlined in this policy by current or former employees will not be honored if the employee failed to perform any of the steps described in this policy.

Use of The Guild Vehicles

The Guild has specific procedures governing the sign-out, use and maintenance of all The Guild vehicles. Employees are expected to always follow those procedures. Only authorized employees may use The Guild vehicles. Vehicles may be used for Guild purposes only. Infrequent, incidental personal use of The Guild vehicles with the Chief Executive Officer's authorization may be permitted in certain circumstances.

Employees whose jobs duties require the driving of The Guild vehicles must have a valid driver's license. Temporary or suspended licenses must be reported to a supervisor and the Human Resources Department immediately. At date of expiration, the Human Resource Department will request a current copy of each employee's renewed license. Employees who use The Guild vehicles in the course of their job duties are expected to exercise care, perform required maintenance and follow all operating instructions, safety standards and guidelines. Employees must notify the appropriate supervisor, the director of facilities and the human resources department if any vehicles appear to be damaged, defective or in need of repair, regardless of the cause of the damage. Any vehicle repair needs should be written up on a maintenance request form and given to the receptionist. If involved in a car accident with a vehicle of The Guild, the employee must fill out an accident report immediately. These reports are attached to each vehicle clipboard and available from the receptionist. Completed reports need to be returned to the program administration as soon as possible.

Driver's Responsibilities

Drivers of The Guild vehicles are required to do the following:

- Report **immediately** any change in safe driving history to the Human Resources Department. If the license is revoked or suspended, operating privileges will be terminated.

- Always wear seat belts and require passengers to wear them. Under no circumstances should the number of passengers exceed the number of seat belts.
- Possess the legal class license required for the vehicle being driven.
- Do not allow alcoholic beverages and/or use of controlled substances in a The Guild vehicle at any time.
- Smoking is not permitted in any Guild vehicle.
- Drivers of The Guild vehicles cannot be under the influence of controlled substances and/or alcohol.
- Drivers must operate The Guild vehicles in accordance with applicable local and federal laws and The Guild regulations.
- Never transport passengers, including hitchhikers, family members and friends, for unauthorized use.
- Texting and other use of electronic devices while driving, including making or taking telephone calls, is strictly prohibited.
- Avoid conditions that can cause the loss of control of the vehicle, including driving while sleepy or inattentive; driving too fast for road conditions; or engaging in activities such as cell phone use.
- Immediately report all accidents to The Guild's Facilities Department.
- Traffic or parking violations and citations incurred while driving on Guild business are the sole responsibility of the driver.

An employee who engages in improper, careless, negligent, destructive or unsafe use or operation of vehicles or who receives excessive traffic and/or parking citations may be subject to disciplinary action. Employees are obligated to pay any fines they are assessed for motor vehicle citations.

Use of Personal Vehicles

An employee who wishes or plans to transport individuals served in his or her personal vehicle must provide The Guild with current evidence of personal automobile insurance coverage with minimum coverage as follows: injury per person, \$100,000; injury per accident, \$300,000; and property damage, \$5,000.

Keys

Upon commencement of employment, new employees will receive key-card access and keys as needed to The Guild premises. Individuals residing in adult residences will also be given keys to the residence when they move in.

Employees or residents of adult homes may not give or lend their keys to any other person, including other employees. Furthermore, employees may not make copies of The Guild keys. Lost or stolen keys should be reported immediately to the Chief Financial Officer. Failure to return keys upon termination will result in a charge of \$20 per key.

Employee Identification Badges

Each employee will be given an employee identification badge. For security purposes, employees should wear badges so they are always visible during the workday and while on The Guild property. Employees working during evenings and weekends will need to use their badges to enter and exit The Guild buildings. Lost or stolen badges should be reported immediately to the director of administration. Employees who lose their badges will be allowed one replacement at no charge. After that, a \$10 charge will be assessed. Upon separation of employment, badges must be returned to The Guild.

Security Cameras

To promote the safety of all individuals served, The Guild uses security cameras in The Guild hallways, corridors and other common areas of The Guild School and youth residences.

Corporate Credit Card

The Guild provides select employees with corporate credit cards for the purpose of conducting The Guild's business. Corporate credit card users and credit limit approvals are at the discretion of the chief financial officer and chief executive officer.

All corporate credit cards are the property of The Guild and authorized users shall take the necessary precautions to ensure the safekeeping of the card. Each cardholder must read and sign a statement agreeing to adhere to the corporate card policy. Corporate credit cards may not be used for personal expenditures of any kind. No cash advances are allowed. Receipts are required for any expense. Confirmation statements, shipping receipts or similar reports may be used to document telephone orders or fax orders. Any exception shall be explained in writing and signed. Reports will be reviewed for validity and accuracy by the chief financial officer or director of finance prior to being paid.

Any employee detecting improper card use (e.g. overdue expense reports or use for non-business expenses) must report the information, in confidence, to the chief financial officer. If the cardholder is the chief financial officer, the employee should bring the information to the chief executive officer's attention. Card holders will be responsible for reimbursing The Guild for any unauthorized charges including interest.

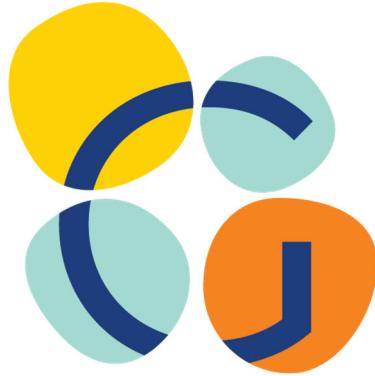
Intellectual Property

This policy governs the handling of inventions, copyrightable works, and other intellectual property and tangible research property made by individuals involved in educational, research, clinical or other activities associated with The Guild, including employees, volunteers, contractors and subcontractors.

Copyrightable works and all other intellectual property created by an employee, volunteer or contractor as a function of their association with The Guild are owned by The Guild. Employees are not authorized to sign, and should not sign, confidentiality agreements, license agreements, material transfer agreements, research agreements or any other agreements that may restrict, commit or affect intellectual property they create while employed by or otherwise affiliated with The Guild.

Individuals should take no action to sell, license or otherwise commit or dispose of intellectual property they create unless and until such action is approved by the Chief Operating Officer or the Chief Executive Officer. Generally, approval will be given for individuals to take such actions on their own only if and after the chief operating officer or the chief executive officer determines that the individual owns the intellectual property. Moreover, prior to using The Guild name in any publication, the individual must request and receive agency approval in writing from either the Chief Operating Officer or the Chief Executive Officer. All research undertaken at The Guild is subject to the Human Subject Research policy.

Individuals should be aware that consulting agreements, in the form proposed by companies, school districts, individual contractors or other third parties, may contain provisions that are inconsistent with this Intellectual Property policy as well as other policies of The Guild. Therefore, individuals are required to submit all consulting agreements to the Chief Executive Officer, Chief Operating Officer or Chief Financial Officer for approval.



Section VIII: Leaves of Absence

Family and Medical Leave

In compliance with the Family and Medical Leave Act of 1993 (FMLA), The Guild will grant up to 12 weeks of unpaid leave during a 12-month period to an eligible employee for one or more of the following reasons:

- For incapacity due to pregnancy, prenatal medical care or childbirth
- To care for the employee's child after birth, or placement for adoption or foster care
- To care for the employee's spouse, son or daughter, or parent who has a serious health condition
- For a serious health condition that makes the employee unable to perform the job.

Military Family Leave Entitlements

Eligible employees with a spouse, son, daughter or parent on active duty or called to active duty status in the National Guard or reserves in support of a contingency operation may use their 12-week leave entitlement to address certain qualifying exigencies.

Separately, eligible employees may be entitled to up to 26 weeks of unpaid leave to care for a covered servicemember with a serious injury or illness.

Use Of Paid Leave

An employee wishing to take FMLA is entitled under The Guild policy to take paid leave (for example, vacation, personal time off, or sick leave) concurrent with FMLA. Unless the employee is also taking approved Paid Family and Medical Leave under Massachusetts law, the employee will be required to use existing sources of The Guild paid leave concurrent with FMLA.

Employees Who Are Eligible

Employees are eligible to take family or medical leave only if they have worked for The Guild for at least 12 months and for at least 1,250 hours over the previous 12 months and only if there are at least 50 employees of The Guild within 75 miles.

Meaning of 12-Month Period

The 12-month period during which an eligible employee can take a leave under this policy is measured backward on a rolling basis from the date when an employee uses any such leave. An employee's leave entitlement consists of any balance of the 12 weeks that has not been used during the immediately preceding 12-month period.

Advance Notice Requirement

Whenever the need for leave is foreseeable, an employee must give The Guild at least 30 days' advance notice before leave commences. A form requesting leave is available from the Human Resources Department. When the need for leave is not foreseeable 30 days in advance, an employee must give notice to The Guild within two working days of learning of the need for leave, absent extraordinary circumstances. If an employee knew about the need for leave but failed to give timely notice to The Guild, The Guild may deny the taking of leave until 30 days after the date of the employee's request.

Mandatory Medical Certification

Any employee requesting leave because of a serious health condition of the employee or family member must furnish The Guild with appropriate medical certification. The certification must be signed by the appropriate healthcare provider on the form provided by the Human Resources Department. Employees should submit the medical certification form along with their leave request. The Guild may deny the taking of leave until the required certification is provided. In cases of unforeseen leave, medical certification must be submitted to The Guild as soon as possible. The Guild may, at its discretion, require any employee seeking leave because of a serious health condition to obtain a second or third opinion at The Guild expense.

When an employee is on leave, subsequent recertification of a medical condition must be submitted to The Guild every 30 days or when The Guild requests certification in appropriate circumstances, such as when an employee seeks to extend the leave or there is a change in the serious health condition for which the leave is taken.

Intermittent or Reduced Leave

When medically necessary, an employee may take intermittent leave (two or more separate leave periods) or reduced leave (where an employee continues to work, but for fewer hours per day or per week). In such cases, the total number of hours or days of leave taken by the employee is limited to the equivalent of 12 work weeks. Employees must make a reasonable effort to schedule the leave in a manner that will not unduly disrupt The Guild's operations. The Guild may transfer an employee to an available alternative position with equivalent pay and benefits for which the employee is qualified if that position can accommodate recurring periods of leave better than the employee's regular job.

Benefits

Employees who take leave will not lose employment benefits that were accrued prior to the date the leave commenced. However, employees will not accrue seniority or PTO benefits during leave. Except for health insurance coverage (see below), no employee benefits will be provided by The Guild while an employee is on unpaid leave.

Health Insurance Coverage

Employees who are out on leave will be kept on The Guild's group health insurance plan at the same level, with the same coverage and under the same conditions as if they had not taken leave. For employees on paid leave, their share of premium payments will be deducted from their salary in the usual manner. Employees on unpaid leave are responsible for making timely payments to The Guild for their share of premium payments, in accordance with the schedule established by The Guild before unpaid leave commences, in order to avoid cancellation of their coverage.

If an employee fails to return to work at the end of the leave period and the failure to return is not due to circumstances considered beyond the employee's control, the employee must reimburse The Guild for health insurance premiums paid by The Guild while the employee was on leave. The Guild will require sufficient medical certification of an employee's inability to return to work because of a serious health condition before the employee will be released from the requirement to reimburse The Guild for health insurance premiums paid during the employee's leave period.

Employee Reporting Requirements During Leave

Employees on leave must report to The Guild every 30 days on their status and intent to return to work. The Guild's obligations under the Family and Medical Leave Act of 1993 cease when an employee gives The Guild notice of his or her intention not to return to work.

Medical Certification of Fitness to Return to Work

When an employee is returning to work after a serious health condition—whether or not the absence was covered under the Family and Medical Leave Act (FMLA)—The Guild may require a fitness-for-duty certification from a licensed healthcare provider. This certification must confirm the employee's ability to safely and effectively perform the essential functions of their position. The Guild will notify the employee in advance if this documentation is required. Employees may not return to work until the certification is received and reviewed. Failure to provide appropriate documentation may delay reinstatement or result in administrative action.

Restoration to Position

Upon return from leave, employees will be restored to either the same position they held when the leave commenced or to an equivalent position with equivalent employment benefits, pay, and other terms and conditions of employment. However, this guarantee of restoration shall not apply to certain highly compensated employees if necessary to avoid substantial and grievous economic damage to The Guild's operation.

Coordination with Other Leaves

FMLA will run concurrently with any other leaves providing benefits similar to FMLA in accordance with applicable law.

Parental Leave under Massachusetts Law

Any full-time employee who has completed their probationary period (90 days) will be eligible for up to eight weeks of unpaid leave for the purpose of giving birth or for placement of a child under the age of 18 (or under the age of 23 if the child is mentally or physically disabled) for adoption or foster care. Parental leave is gender neutral and applies to all new parents.

If an employee is entitled to take FMLA under federal law or PFML under state law at the same time as parental leave under this policy, the leave periods will run concurrently (not be added together).

If an employee is entitled to take Parental leave under this policy alone (either because s/he is not eligible under FMLA/PFML or because s/he has already exhausted their available leave under FMLA/PFML, the employee must give the Chief Executive Officer or the Human Resources Department at least two weeks' notice of her or his anticipated date of departure and intention to return to work. Parental leave will be without pay, except that accrued sick leave and disability benefits can be applied during Parental leave for pregnancy and childbirth-related disabilities under the same terms and conditions that apply to other temporary medical disabilities. Available paid leave may be used during any period of parental leave.

At the conclusion of Parental leave, the employee will be reinstated to her or his previous or a similar position with the same salary that s/he received at the commencement of the leave. The Guild, however, reserves the right not to reinstate an employee on Parental leave to her previous or similar position if other employees of equal seniority and status in the same or similar position have been laid off due to economic conditions or have been otherwise affected by changes in employment conditions during the period of Parental leave. Parental leave shall not affect the employee's right to receive vacation time, sick leave, bonuses, advancement seniority or other benefits for which s/he was eligible at the date of leave, but Parental leave time shall not be included in the computation of such benefits.

MA Paid Family and Medical Leave

Massachusetts employees may be eligible for partially paid leave under the Massachusetts Paid Family Leave Act ("PFML") as follows:

- Up to 20 weeks of paid medical leave in a benefit year if you have a serious health condition that incapacitates the employee from work,
- Up to 12 weeks of paid family leave (i) related to the birth, adoption, or foster care placement of a child, or (ii) because of a qualifying exigency arising out

- of the fact that a family member is on active duty or has been notified of an impending call to active duty in the Armed Forces, or (iii) to care for a covered family member with a serious health condition.
- Up to 26 weeks of paid family leave in a benefit year to care for a family member who is a covered service member with a serious health condition.

However, no more than 26 weeks (in the aggregate) of paid leave may be taken in a benefit year. A benefit year runs for 52 consecutive weeks commencing on the Sunday before the first day of leave.

Employees applying for PFML must provide written notice to The Guild's Benefits Administrator stating the reason for requesting PFML and the approximate dates of the requested leave. The notice must be submitted at least 30 days prior to the start of the leave, or as soon as reasonably practicable.

Employees must apply directly to the Department of Family and Medical Leave (the "Department") for all PFML, in accordance with the forms and procedures prescribed by the Department. The Department will notify The Guild if a request for PFML is approved. All benefits under PFML will be paid directly by the Department, and not by The Guild.

If the Department notifies The Guild that a request for PFML has been approved, the employee will be placed on a PFML leave of absence for the dates approved by the Department. Upon return to The Guild, the employee will be restored to the same or an equal pay position, with the same status, pay, employment benefits, length-of- service credit, and seniority as of the date of PFML.

The employee may, but is not required to, use existing sources of paid time off concurrent with this leave, but may not collect more than individual average weekly wage as determined by the Department. In addition, the employee may not extend leave by using existing sources of paid time off except in the case of extended sick leave. Paid time off (i.e., vacation, personal time off, sick leave, etc.) will not accrue while not actively at work. The Guild will continue to pay its portion of health insurance premiums during such a leave provided the employee continues to pay their share of the premiums. PFML shall run concurrent with any available leave under the FMLA or any other policy or applicable law providing benefits similar to PFML.

The Massachusetts Department of Family and Medical Leave
Charles F. Hurley Building
19 Staniford Street, 1st Floor Boston, MA 02114
(617) 626-6565
www.mass.gov/DFML
Small Necessities Leave

Eligible employees may take a total of 24 hours of unpaid leave during a 12-month period to participate in school or day-care activities that are directly related to the educational advancement of the child, to accompany a child to routine medical or dental appointments or to accompany an elderly relative to routine medical or dental appointments.

An eligible employee is an employee who has worked for The Guild for a total of at least 12 months (whether consecutive or non-consecutive) and for at least 1,250 hours of service within the immediately preceding 12-month period, and only if there are at least 50 employees of The Guild within 75 miles.

The 24-hour leave may be taken intermittently or on a reduced leave schedule. If an employee wishing to take necessities leave is entitled under existing The Guild policy to take paid leave (for example, vacation, personal, family and medical or sick leave), The Guild will require that all available paid leave be taken and exhausted before unpaid small necessities leave may be used. If the necessity for the leave is foreseeable, an employee is required to provide The Guild with at least seven days' notice before the date the leave is to begin. If the necessity for the leave is not foreseeable, then the employee must provide such notice as is practicable.

Upon request by The Guild, an employee must provide written certification from an appropriate person or entity certifying the basis for the requested small necessities leave. Such certification shall be in the form provided by The Guild.

Jury and Witness Duty

Employees who are summoned to serve on a jury will be paid by The Guild for the first three days of jury service at their regular rate of compensation. Thereafter, The Guild will make up the difference between the rate paid for jury service and a full-time non-exempt employee's regular rate of compensation up to 30 days in a year.

Exempt employees will be compensated at their regular daily rate for any week in which they are on jury duty and perform any work for The Guild. An exempt employee who performs no work for The Guild during any week that the employee is on jury duty will be compensated for the week and reimbursed the court compensation amount to The Guild.

Employees are expected to report to work if they are released from jury duty before 1. Employees called for jury duty must give their supervisor a copy of the jury summons as soon as possible after receiving it. Employees are expected to keep their supervisor informed of the anticipated length of their jury service. Time spent on jury duty does not count for purposes of computing overtime.

Employees subpoenaed to appear as a witness in a trial may use accrued vacation to cover their absence. Employees who have no unused, accrued leave may take unpaid leave for the purpose of complying with the subpoena. Employees subpoenaed to be a witness in a trial must give their supervisor a copy of the subpoena as soon as possible after receiving it and are expected to make a reasonable effort to minimize the duration of their witness leave. Exceptions may be decided by the chief executive officer.

Military Leave

The Guild provides unpaid leaves of absence to the extent required by law to employees who leave The Guild's employment to join the armed forces of the United States (including the reserves) for active duty or for training.

Employees called to active duty must notify their supervisor and the Director of Human Resources, before they leave for active duty, of their expected dates of leave from and return to The Guild unless it is impossible or unreasonable to do so due to military necessity. An employee may be eligible for re-employment to the position that the employee held prior to entering the armed forces, or to a position of similar seniority, status and pay, provided that the following apply:

- The employee was discharged or released under honorable conditions.
- The employee is qualified for the job.
- The employer's circumstances have not so changed as to make it impossible or unreasonable to rehire the person.
- The employee's total service in the armed forces is no more than five years (except for additional amounts required by law); and
- The employee applies for re-employment in accordance with applicable law.

Re-employed persons are considered to have been on leave of absence during their period of military service and are eligible for all benefits offered to others returning from a leave of absence, as well as benefits required by applicable law as if the military service member had remained continuously employed.

Employees who are required to miss work to fulfill their military training obligations (including annual reserve training) may take unpaid leaves of absence for that purpose. Employees who learn that they must attend military training must notify the Human Resources Department, in advance of their training, of the expected duration of the training and their anticipated date of return, unless there is a military necessity that makes advance notice impossible or unreasonable.

The complete posting of employee rights under the Uniformed Services Employment and Reemployment Rights Act (USERRA) are posted in the main notice bulletin cabinet at the end of the Conference Room and in the copy area of the administrative wing.

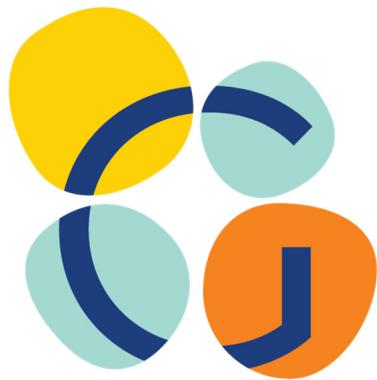
Bereavement Leave

In addition to the personal time off described above, The Guild provides full-time employees with up to 24 hours per occurrence of bereavement time off in the event of a death in an employee's immediate family. Immediate family is defined as spouse, domestic partner, child, parent, spouse's parent, grandparent, sibling or stepfamily members.

In the event of death outside of an employee's immediate family, the employee may use vacation or personal time for up to three working days of leave. Employees may, with the approval of their supervisor, extend bereavement leave by using accrued paid vacation time.

Limitations on Leaves of Absence

Employees on leave of absence are expected to periodically, at least once a month, keep The Guild informed of their status and intention to return to work and to respond promptly to any request by The Guild for such information. Employees who do not keep in touch with The Guild or who do not return to work at the conclusion of their leave are deemed to have abandoned their job.



Section IX: Communication Between The Guild and Employees

Supervision

Receiving supervision is an essential part of work at The Guild. It is a support to help employees do their jobs most effectively. This document provides information about the nature of supervision, including employees' responsibilities and rights.

Purpose of Supervision

Supervision is a collaborative process focused on four major goals:

- Ensuring the quality of care provided and helping employees strengthen the quality of work.
- Ensuring that administrative tasks are completed accurately and on time. This could include documentation, treatment plans and time sheets.
- Providing support to employees as they face work-related challenges.
- Helping employees grow and develop skills.

Supervisors

An employee may have one or more supervisors. If there is more than one, each supervisor will describe their role to the employee. Employees may ask supervisor(s) to clarify who to go to for specific tasks.

Frequency, Length and Format

Supervisors will inform employees about their expectations about the frequency, length, and format of supervision. It is each supervisor's responsibility to meet those expectations. It is each employee's responsibility to participate in the supervision offered. If an employee is unable to attend a supervision session, please notify the supervisor in advance. Try to reschedule.

Supervisors' Qualifications

A supervisor is qualified to supervise all or part of an employee's work. Supervisors may describe their educational background, work experience and areas of expertise. If they do not describe their experiences, an employee may ask them to do so. A supervisor might ask an employee to consult with other individuals in the organization who have unique qualifications on certain topics.

Content of Supervision Sessions

Each supervisor approaches the supervision process in different ways. In general, employees are expected to be active participants in supervision and prepared to review work. Employees should make sure to discuss issues that may affect job performance or challenges faced at work.

Please alert supervisors about clients who have voiced concerns about work, including formal and informal complaints. Supervisors are legally and professionally responsible for employees' work, so employees must inform them of the critical types of information described above.

Supervisors will provide employees with expectations and instructions regarding issues such as caseload size, productivity, documentation and scheduling. Employees also can expect periodic discussion regarding performance, learning needs and opportunities for continuing education. As supervision is a collaborative process, employees are expected to raise with supervisors any concerns about your job, relationships with other employees, other parts of work life or specific supervisory decisions. In all cases, employees ultimately are responsible for following a supervisor's legal instructions and direction about work.

Evaluating Performance

A specific role for supervisors is to help identify employees' work-related strengths and learning needs and to help you improve skills. They have an obligation to provide employees with constructive feedback throughout the year and to periodically complete a written performance evaluation. Employees will have the opportunity to discuss the evaluation with their supervisor and to comment on it in writing. Employees will receive a copy of the performance evaluation.

Confidentiality and Its Limits

Much of what is discussed in supervision will not be shared with others and your supervisors have an obligation to handle sensitive information carefully. However, it cannot be assumed that the information discussed in supervision is confidential because it may be shared or used for several reasons. Some examples include coordinating treatment; crisis intervention; mandated reporting of client risk to self or others; and performance reviews or personnel-related actions. Employees are expected to report client-related information to supervisor(s), especially when risk to the client or others is involved.

Dual Relationships

Having a personal or business relationship with a client, in addition to a treatment relationship, is prohibited by ethical codes and guidelines. If for any reason an employee finds themselves in such a situation, the employee must bring this to the attention of their supervisor. In a similar way, supervisors do not provide employees with psychological counseling or therapy. Employees may talk with them about how personal issues impact work and they may assist in accessing resources or support to help with those problems. Supervisors must pay close attention to dual relationships with their supervisees, especially when friendships existed prior to the supervisory relationship.

Employee Rights

Employees have the right to be treated with respect, dignity and cultural sensitivity. No employees, including your supervisors, have the right to abuse, sexually harass or exploit anyone.

Open Door Process

Employees are encouraged to let a supervisor know if they are not meeting supervision needs or if the employee perceives a problem with the supervisory relationship. Similarly, if an employee is dissatisfied with a performance review given by a supervisor, the employee should first discuss it with their supervisor. If these discussions do not resolve concerns, the supervisor can direct the employee to their supervisor or to someone in the Human Resources Department. For more information, please see the Human Resources Director or consult the Employee Handbook.

Discipline

The Guild expects all employees to be aware of and to follow workplace policies and rules for the well-being of the individuals served, fellow employees and business operations. There are many organizational, divisional and departmental policies and rules at The Guild. Employees are expected to comply with these internal rules as well as requirements from federal, state and local laws, and funding and accreditation agencies.

The Guild ordinarily utilizes a progressive discipline approach to identify and address employee and employment-related problems. Progressive discipline is a step-by-step process designed to modify unacceptable employee behaviors, which also allows discipline to start at a higher step based on the severity and circumstances of the situation, including immediate termination of employment when appropriate.

Of course, no discipline policy can be expected to address each situation requiring corrective action that may arise in the workplace. The Guild reserves the right to take any legal action necessary to address the issue at hand, including immediate termination when warranted. Therefore, The Guild takes a comprehensive approach regarding discipline and will attempt to consider all relevant factors before making decisions regarding discipline.

Probationary employees are held to the highest standards for behavior and job performance. Progressive discipline is the exception rather than the rule for probationary employees.

Progressive Discipline Process

Except as otherwise provided herein, The Guild will adhere generally to the following progressive disciplinary process:

- 1. Verbal Warning:** An employee will be given a verbal warning when an employee engages in unacceptable behavior. Verbal warnings shall be documented in supervision records.
- 2. Written Warning:** A written warning is more serious than a verbal warning. A written warning will be given when an employee engages in conduct that justifies a written warning or the employee engages in unacceptable behavior during the period that a verbal warning is in effect.

The written warning will specifically outline the incident or offense and will include a warning that any further violations of rules will result in either a suspension or termination (whichever is appropriate). The employee shall be requested to acknowledge receipt of the written warning by signature. A copy of this signed document will then be presented to the employee. Written warnings shall be placed in the employee's personnel file

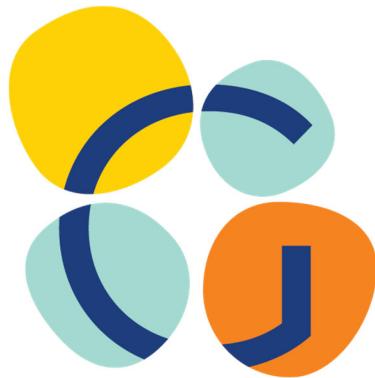
- 3. Suspension:** A suspension is more serious than a written warning. An employee will be suspended when s/he engages in conduct that warrants an investigation. Suspension action must be coordinated with the Human Resources Department prior to implementation.
- 4. Termination:** An employee will be terminated when s/he engages in conduct that justifies termination or does not correct the matter that resulted in less severe discipline.

Again, while The Guild will take disciplinary action in a progressive manner when appropriate, it reserves the right, at its sole discretion, to decide whether disciplinary action will be taken in a given situation. In this regard, an employee failing to comply with the mandated reporting requirements will be terminated without first receiving lesser levels of discipline.

Employee Concerns

The Guild is committed to treating all employees fairly. Any employee who feels that s/he has not been treated fairly may request a meeting with his or her supervisor to help resolve the issue. Employees who are not satisfied after the discussion with their supervisor may request that the next higher level of management review the problem. Any employee who remains dissatisfied may address the matter with the highest appropriate level of management. The decision of that level of management will be final.

Nothing in this section shall prohibit lawful reporting of abuse or neglect of individuals served or negate employee rights outlined in the Employee Protection Whistleblower policy. If an employee is reluctant to raise concerns with a supervisor or is not satisfied with the supervisor's response, The Guild provides several options for employees to raise concerns, including the option of raising a concern anonymously through the Whistleblower Policy.



Section X: Health and Safety

Emergency Medical Supplies

All residences, school buildings and vehicles will maintain first aid supplies. First aid supplies will include, but are not limited to, bandages, gloves, gauze, adhesive tape, hydrogen peroxide or other cleaning solutions

- In the residences, first aid supplies will be in a locked storage unit on each floor.
- At the 521 Virginia Road site, first aid supplies will be maintained in the nursing suite, staff lounge, cafeteria, student lobby desk and visitor lobby desk, and in the physical education area.
- Each Guild vehicle will have a first aid kit in the glove compartment. An employee who is injured at work and requires more extensive medical treatment should immediately notify his or her supervisor or, if the supervisor is unavailable, a fellow employee.

An employee must report all injuries, regardless of severity, to their supervisor. If an employee witnesses or is involved in an accident or emergency, please do as follows:

- Don't panic.
- Use common sense.
- If the emergency seems severe or urgent, call 911 and contact the on-call supervisor.
- In less urgent situations, alert the supervisor and wait for specific instructions on how to proceed.
- For dealing with blood borne pathogens (BBP), a bio-box is located in each residence and in classrooms with red dots on the closets. The BBP policy is distributed during annual training, and a copy is available in the procedures manual in each residence.
- If the injury is workers' compensation-related, see section on Workers' Compensation for reporting of injury.

Automated External Defibrillation

The Guild recognizes the importance of having medical emergency equipment ready should a need arise. The Guild headquarters and school building have an Automated External Defibrillator (AED), which can assist to save lives by way of an electric shock to a heart that has stopped beating.

- The Guild has a Limited Public Access Defibrillation Program with the Automated External Defibrillation (AED) located at the front desk at the student entrance lobby.
- The Limited Public Access Defibrillation Program at The Guild meets the requirements of the Mass General Laws c112 section 12V1/2 relating to public access defibrillation programs, as written and amended in the future.
- The Guild follows the protocol and procedures developed by ENPRO, The Guild's AED overseer. Notification was made to The Guild's medical advisor and the insurance carriers concerning the implementation of an AED program.

- All staff who are currently trained and certified in CPR and AED are designated AED providers at The Guild and can use the AED.
- The AED device will be checked regularly per the ENPRO specifications.
- Any problems with the AED device will be reported to the AED coordinator, who is part of the Training Department.

Worker Injury Protocol

What to Do if Injured at Work: Severe Injury

A non-injured staff person should accompany and assist the injured employee with the following procedures:

- Go directly to an emergency room or call an ambulance.
- Assisting staff should first obtain First Report forms from the Human Resources Department.
- Assisting staff must stay in contact with the employee and supervisor through treatment.
- Assisting staff must contact the Human Resources Department (and on-call supervisor if applicable) and inform them of the situation.
- When possible, the injured employee should follow the above procedure for communicating with the supervisor and the Human Resources Department.
- When it is not possible for the injured employee to return, the assisting staff person and the injured employee's supervisor must ensure that the Human Resources Department receives the completed First Report form within 48 hours of the injury.

What to Do if Injured at Work: Non-Severe injuries

- Provide initial first aid and complete First Report forms from Human Resources, available in the binder at each house and in the Human Resources Department.
- Arrange further treatment if needed
- Regular Business Hours: Contact the Human Resources Department.
- Overnight, Weekends or Holidays:
 1. Inform the on-call supervisor,
 2. If recommended by the on-call supervisor, call an emergency department or an urgent care center for advice on further treatment,
 3. If immediate treatment is recommended, go to a walk-in clinic, emergency room or urgent care center. Bring the First Report form and have the medical provider complete a treatment form. Do not leave the form with the medical provider.
 4. If immediate treatment is not required, contact Human Resources Department no later than the following business day.

Communications and Timing

- Immediately (or within 4 hours): Injured employee must inform supervisor of status, return to work instructions and any restrictions.

- Within 24 hours: The Injury Report form must be reviewed and completed by the injured employee and supervisor.
- No more than 48 hours after injury: the completed Injury Report form must be returned to the Human Resources Department.

For further information, refer to the Workers' Compensation binder kept in each residence, in the residential staff office or in the Human Resources Department in Concord.

Employee Morale, Health and Welfare Activities

The Guild has established this policy to recognize achievement and service, and to maintain staff morale, health and welfare. The Guild believes that these measures further our mission to provide quality support to the individuals we serve. All employees are eligible for these activities. These procedures complement the employee benefit plans administered by The Guild. The activities are incurred as part of an established practice and custom for the improvement of working conditions, employer-employee relations, employee morale and employee performance. Employee morale, health and welfare activities may include the following:

- Organization publications
- Recreational activities
- Health/first aid
- Nominal gift certificates for exceptional accomplishments
- Staff recognition awards
- Employee Assistance Program
- Flowers/fruit baskets to recognize important events in an employee's life (birth, serious illness or death of an employee or immediate relative)
- Holiday gifts

Care will be taken that all costs incurred under this policy will be reasonable, ordinary, allocable and necessary to the provision of program services and adequately supported through written documentation. Any income generated from any of the fees charged or monetary collections taken, if any, for employee functions, will be used to defray the operating costs of the employee, morale, health and welfare activities.

Employee Handbook Cross Reference

(December 8, 2025)

Chief Executive Officer	Amy Sousa
Chief Financial Officer	Ivette Rodriguez
Chief Operating Officer	Michael Clontz
Chief Education Officer	Annie Willis
Chief Program Officer	Maureen Costello-Shea
Director of Human Resources	Matthew Carmichael
Director of Health Services	Elizabeth-Ann Whitkowski
Privacy and Compliance Officer	Michael Clontz