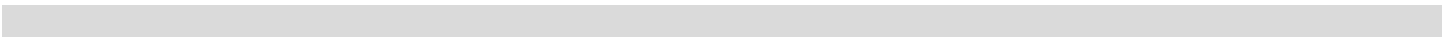




---

# Employee Handbook



# Employee Handbook

Corporate Policy Manual, Chapter 4		Human Resources
Effective Date: October 1, 2018	Last Revision:	

## Contents

- 4.1 Introduction** \_\_\_\_\_ **6**
  - Overview \_\_\_\_\_ 6
  - Handbook for Employees \_\_\_\_\_ 6
  - Corporate Policy Manual \_\_\_\_\_ 6
  - Other manuals- procedures or handbooks \_\_\_\_\_ 7
- 4.2 Employment Relationship & Equal Opportunity** \_\_\_\_\_ **8**
  - Employment Relationship: “At Will” \_\_\_\_\_ 8
  - Equal Opportunity Employment \_\_\_\_\_ 8
  - Open positions \_\_\_\_\_ 8
  - Verification of eligibility to work in the United States \_\_\_\_\_ 8
- 4.3 Hilltop Purpose and Governance** \_\_\_\_\_ **10**
  - Hilltop Purpose \_\_\_\_\_ 10
  - Hilltop Operates for Charitable Purposes \_\_\_\_\_ 10
  - Hilltop is governed by a Board of Directors \_\_\_\_\_ 10
- 4.4 Definitions** \_\_\_\_\_ **11**
  - Definitions \_\_\_\_\_ 11
    - Exempt \_\_\_\_\_ 11
    - Non-exempt \_\_\_\_\_ 11
    - Regular Employees \_\_\_\_\_ 11
    - Full Time Employee \_\_\_\_\_ 11
    - Part Time Employee \_\_\_\_\_ 11
    - Seasonal Employees \_\_\_\_\_ 11
    - Variable Hour Employees \_\_\_\_\_ 12
    - Management Team \_\_\_\_\_ 12
    - When referenced in this handbook, the Management Team is defined as those managers who are on the Operations Team, which includes Senior Leadership. \_\_\_\_\_ 12
    - Hire Date / Length of Service \_\_\_\_\_ 12
    - Proselytize: \_\_\_\_\_ 12
    - Salary Review Date \_\_\_\_\_ 12
    - Relative \_\_\_\_\_ 12

Harassment _____	12
Abuse _____	13
Compromise of a Professional Relationship _____	13
Family Member of a Client _____	13
Grievance _____	13
Prohibited Relationship _____	13
<b>Enforcement Officers _____</b>	<b>13</b>
Compliance Officer _____	13
Privacy _____	14
Security _____	14
Information Technology Officer _____	14
Fiscal Year _____	14
<b>4.5 Code of Conduct _____</b>	<b>15</b>
<b>Applicable Laws _____</b>	<b>15</b>
<b>Duty to report suspected abuse and neglect _____</b>	<b>15</b>
<b>Code of Ethics and Business Conduct _____</b>	<b>15</b>
<b>Anti-Violence and Weapons _____</b>	<b>18</b>
<b>Professional Behavior _____</b>	<b>19</b>
Business dealings between employees _____	19
Employee owned businesses _____	19
Employee Code of Ethics _____	20
Harassment Prohibited _____	20
Protected Disclosure & Whistleblower _____	21
Empowered Employees _____	22
Duty to report suspected violation of law, code or policy _____	22
Hilltop Management Responsibilities after report is made _____	23
Dress _____	23
Personal Habits _____	24
Work area organization _____	24
<b>4.6 Alcohol and Substance Use _____</b>	<b>25</b>
<b>Prohibited use _____</b>	<b>25</b>
Prescription drugs _____	25
Alcohol, marijuana or other substance _____	25
Report required _____	25
<b>4.7 Commitment to Clients &amp; Client Rights _____</b>	<b>26</b>
<b>Services for Clients _____</b>	<b>26</b>
<b>Client Rights _____</b>	<b>26</b>
No Proselytizing or Faith Based Requirement _____	26
<b>Confidentiality _____</b>	<b>27</b>
<b>Client Protection _____</b>	<b>27</b>
Relationships between Clients & Employees _____	28

Client Complaints or Concerns _____	29
What Hilltop will do, when a report is made _____	29
<b>4.8 Confidentiality _____</b>	<b>30</b>
Client information _____	30
Other information _____	30
<b>HIPAA Privacy Practices _____</b>	<b>30</b>
<b>4.9 Representing Hilltop _____</b>	<b>32</b>
Social Media, Media Interaction and Public Appearances _____	32
Communication & Marketing _____	33
Privacy: use of Hilltop name _____	33
Lobby activities by designation only _____	34
<b>4.10 Use of Company Property _____</b>	<b>35</b>
Hilltop Buildings and Equipment _____	35
Use of Computers and Office Equipment _____	35
Generally prohibited activities _____	35
Software _____	36
Specialized Equipment _____	36
Conference Rooms _____	36
Records _____	37
Hilltop vehicles _____	37
Driving Requirements _____	37
Driver's License _____	39
Accidents _____	39
Parking tickets; violation of traffic laws _____	39
Use of Portable Electronic Devices in Motor Vehicle _____	39
Purchasing Green & Recycling _____	40
Employee Participation _____	40
<b>4.11 Absences, leaves and holidays _____</b>	<b>41</b>
<b>Attendance, Absenteeism and Tardiness _____</b>	<b>41</b>
Holiday Pay _____	41
Jury Duty / Subpoenaed Witness _____	42
Military Duty _____	42
Domestic Violence Leave _____	43
Family and Medical Leave _____	43
How to request FMLA leave _____	44
Returning to work after FMLA leave _____	45
Sabbatical Leave _____	45
<b>4.12 Pregnancy and Child Birth Support _____</b>	<b>47</b>

<b>4.13 Wage &amp; Salary, Payroll processes</b>	<b>48</b>
<b>Payroll period and general process</b>	<b>48</b>
Employer paid taxes	48
Required Payroll Deductions	48
Withholding responsibilities	49
<b>Hours of Work</b>	<b>49</b>
Time Records	49
Electronic time sheets	49
Breaks, Lunch and Rest Periods	50
Lunch and breaks; unplanned absences	50
Overtime	51
On-call	51
Payroll advance	51
<b>4.14 Health &amp; Safety</b>	<b>53</b>
<b>Safety Expectations</b>	<b>53</b>
<b>Prohibited items</b>	<b>54</b>
<b>Smoke Free Facility</b>	<b>54</b>
<b>Security Inspections</b>	<b>54</b>
<b>Workers Compensation</b>	<b>55</b>
What to do if you are injured on the job	55
Modified Duty	55
<b>Health &amp; Wellness Program</b>	<b>56</b>
Required Vaccinations & Flu Shots	56
<b>Drug Testing</b>	<b>56</b>
Employee Assistance Program	57
<b>4.15 Additional employment related information</b>	<b>58</b>
<b>Employment of Relatives</b>	<b>58</b>
<b>Prohibited behaviors or relationships with clients</b>	<b>58</b>
<b>Personnel Records</b>	<b>58</b>
<b>Training Requirements</b>	<b>59</b>
<b>Performance Appraisals</b>	<b>59</b>
<b>Promotions</b>	<b>59</b>
<b>Termination of Employment</b>	<b>59</b>
<b>4.16 Benefits</b>	<b>60</b>
<b>Paid Time Off (“PTO”)</b>	<b>60</b>
Scheduling PTO	61
PTO for recognized holidays	61
Cash out	62

<b>Extended Illness Bank (“EIB”)</b> _____	<b>62</b>
EIB may be paid upon resignation _____	63
<b>Tuition Reimbursement</b> _____	<b>64</b>
<b><i>4.17 Unacceptable Conduct &amp; Corrective Actions</i></b> _____	<b>65</b>
<b>Unacceptable Conduct</b> _____	<b>65</b>
Problem Resolution _____	66
How do I report a problem? _____	66
<b>Infractions of Policy or code of conduct</b> _____	<b>67</b>
<b>Administrative Leave</b> _____	<b>67</b>

## 4.1 Introduction

ID: 4.1		Human Resources	
Effective Date: 2017	Last Revision:		

### Overview

Please read this handbook carefully. It will acquaint you with many of the important rules, policies, benefits, and practices that apply to all employees of Hilltop Community Resources, Inc.

This handbook is not intended to create and shall not be construed to create a contract between employees and Hilltop Community Resources, Inc., either express or implied.

Policies may be changed at the sole discretion of the Hilltop Chief Executive Officer (“CEO”) without prior notice to or approval by the employees. No other supervisor or individual is authorized to modify the terms of these policies either verbally or in writing.

### Handbook for Employees

This **employee handbook** is a part of the policy manual for Hilltop Community Resources, Inc.

Policies are detailed in Hilltop’s Corporate Policy Manual.

The Employee Handbook is written as a specific employee handbook that will give employees general information concerning employment at Hilltop. It should be used as a supplement to, but not in place of, the Corporate Policy Manual.

If you are uncertain about any policy, please ask your supervisor.

### Corporate Policy Manual

The Corporate Policy Manual contains **policies**, which prescribe **the rules and methods of conducting Hilltop’s business**.

The audience for the Corporate Policy Manual is anyone who wishes to know how Hilltop functions and is administered.

You, as an employee, are encouraged to read the Corporate Policy Manual.

Reading the Corporate Policy Manual will provide high-level informative information on the regulations and guidelines established by Hilltop to ensure efficiency of operations, the safeguarding of assets, achievement of goals and compliance with laws and regulations to achieve the mission of Hilltop Community Resources, Inc.

## Other manuals- procedures or handbooks

Hilltop has attempted to separate policy from procedure. **Procedures** are defined as specific actions, conduct, **routines and processes used to comply with policies**. Procedures are normally tied to policies, but may be simply instructions on how to do something.

The audience for procedures is internal, and usually only available to employees who need to know and follow a procedure or process.

Because Hilltop has a variety of service lines, it is challenging to place all procedures in one manual, at one time. Please refer to departmental procedures or reference manuals for specific procedures. For example, employees seeking instructions on how to make a purchase or use a purchasing card will refer to the Purchasing Handbook, or purchasing procedures. Employees seeking how to conduct the business of the department or program where they are assigned should read the departmental or program handbook, or follow procedures established by the director of the program or department.

Failure to know and follow Hilltop policies and procedures could result in disciplinary action up to and including termination.



## 4.2 Employment Relationship & Equal Opportunity

ID: 4.2	Human Resources
Effective Date: October 1, 2018	Last Revision: October 1, 2018

### Employment Relationship: “At Will”

**Your employment with Hilltop is entered into voluntarily and is considered “at will”. You are free to resign at any time, with or without notice, and for any reason. Hilltop is free to terminate the employment relationship at any time, with or without notice, and with or without cause.**

No policy, verbal statement, or written document shall modify or alter the employment at will relationship in any way.

This handbook is not intended to modify or alter the employment at will relationship in any way.

### Equal Opportunity Employment

**Hilltop will not to discriminate against any employee or job applicant.**

No aspect of employment with Hilltop will be influenced by age, race, genetics, sex, color, religion, national origin, pregnancy, disability, veteran status, ethnicity, military obligations, gender expression, sexual preference, marital status, or any other status protected by state or local law. This prohibition includes unlawful harassment based on any of these protected classes. Unlawful harassment includes verbal or physical conduct which has the purpose or effect of substantially interfering with an individual’s work performance or creating an intimidating, hostile, or offensive work environment.

This provision applies to all employees, including managers, supervisors, co-workers, and non-employees such as volunteers, customers, clients, vendors and consultants.

All equal opportunity matters from any source shall be referred to Hilltop Human Resources.

### Open positions

Job postings for open positions at Hilltop are provided through reasonable sources for advertising and recruitment, including but not limited to: online and printed media, the Mesa County Workforce Center, and on Hilltop’s website at [www.htop.org](http://www.htop.org).

### Verification of eligibility to work in the United States

Hilltop adheres to the requirements concerning verification of employee eligibility to work in the United States as set forth in the Federal Immigration Reform and Control Act of 1986. An I-9 Form (Employment Eligibility Verification Form) must be completed at the time of hire.

Hilltop will require new hires to provide documentation establishing identification and employment eligibility within three (3) business days from date of hire.

If documentation has been misplaced or lost, the new hire has three (3) days to provide to Hilltop Human Resources a receipt showing application for the documentation. Failure to produce the requested receipt within three (3) days may result in termination of employment.

If an employee provides false information in the application for employment process, the employee may be terminated upon Hilltop's discovery of the falsification, regardless of when the falsification or the discovery of falsification occurs.

## 4.3 Hilltop Purpose and Governance

ID: 4.3	Human Resources
Effective Date: October 1, 2018	Last Revision: October 1, 2018

### Hilltop Purpose

Hilltop Community Resources, Inc. has been serving the community since 1950. Since that time, Hilltop’s programs and divisions have changed to meet the needs of our community. These adaptations and changes will likely continue as new programs or business deliveries are created by Hilltop to serve the community and fulfill the Hilltop mission to *“lead through action to make a difference for people of all ages.”*

To achieve its mission, Hilltop provides services to people of all ages to navigate life’s challenges and build a healthy community. Hilltop promotes education, economic stability, wellness and health care, built environments, and social cohesion. Hilltop’s programs assist individuals confronting poverty, violence, mental or physical limitations, aging, and other circumstances. Hilltop collaborates with other organizations to provide services efficiently and effectively.

### Hilltop Operates for Charitable Purposes

Hilltop Community Resources, Inc. is organized under and governed by the Colorado Revised Nonprofit Corporation Act, CRS §7-121-101 et seq. and shall be operated exclusively for “Charitable Purposes,” as established by Hilltop’s Articles of Incorporation<sup>1</sup> and Bylaws.

- The term “Charitable Purposes” means those charitable, benevolent, civic, cultural, literary, educational, religious, scientific, and other charitable purposes described in Code §501(c)(3) and Code §170(c)(1)

### Hilltop is governed by a Board of Directors

The **Board of Directors for Hilltop Community Resources, Inc.** is responsible for setting the mission and strategic direction of Hilltop, as well as providing oversight of the finances, operations and policies of Hilltop. The Board of Directors does not manage the day-to-day affairs of Hilltop.

All corporate powers are exercised by or under the authority of the Board of Directors, and the affairs of Hilltop are managed under the direction of the Board.

The Board of Directors of Hilltop Community Resources, Inc. has obligations and fiduciary duties under state and federal law and obligations related to the federal tax exemption granted to Hilltop.

---

<sup>1</sup> Hilltop’s Articles of Incorporation were filed with the Colorado Secretary of State in 1984 and amended in 2016.

## 4.4 Definitions

ID: 4.4	Human Resources
Effective Date: October 1, 2018	Last Revision: October 1, 2018

### Definitions

#### Exempt

Employees who are exempt from overtime pay. These positions meet specific tests of the Fair Labor Standards Act, as determined by the Human Resource Department. Refer to job description for status.

#### Non-exempt

Employees who are paid a multiple of their regular rate for hours worked in excess of forty hours in a week and twelve hours in a day. Refer to job description for status.

#### Regular Employees

Full time and Part time employees hired for an indefinite period of time.

#### Full Time Employee

Full time employees are regular employees hired for an indefinite period of time to work a regular schedule of 30 -40 hours per week.

#### Part Time Employee

Part time employees are regular employees hired for an indefinite period of time to work a regular schedule of less than 30 hours per work week.

#### Flexible Schedule Employees

Flexible Schedule employees are hired for a specific number of hours in a pay period, but may not have a set schedule of days and hours. The schedule is at the discretion of the scheduling supervisor to meet the needs of the program, and may vary from day to day.

#### Seasonal Employees

Seasonal employees are those who are hired into a position for which the customary annual employment is six months or less, and for which the period of employment begins each calendar year at approximately the same time of year, such as summer or winter.

## Variable Hour Employees

A new employee may be considered a Variable Hour employee if, based on the facts and circumstances on the hire date, the employer cannot reasonably determine whether the employee will average 30 hours per week during the initial measurement period.

The initial measurement period at Hilltop is 6 months from date of hire.

## Management Team

When referenced in this handbook, the Management Team is defined as those managers who are on the Operations Team, which includes Senior Leadership.

## Hire Date / Length of Service

The date of the employee's most recent date of hire.

For purposes of computing employee's benefits rights, the length of service will be all time worked since employee's most recent date of hire as a regular employee, as well as time worked during any previous employment period with Hilltop.

## Proselytize:

To induce someone to convert to one's faith; to recruit or convert to a new faith, institution or cause; espouse, persuade, talk into, convert, convince.

## Salary Review Date

The month and day of the employee's most recent date of salary increase.

## Relative

Relatives include spouse, domestic partner, parent, child, sibling (brother, sister), grandparent, grandchild, aunt, uncle, first cousin, in-laws (brother, sister, father, mother, son, daughter), and any significant other living in the employee's household, as well as "step" relation in any category listed above.

## Harassment

Unlawful harassment includes verbal or physical conduct which has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature.

## Abuse

For purposes of Hilltop policies and processes, abuse includes any of the following:

1. Physical Abuse: Violent non-accidental contact, which results in injury. This includes, but is not limited to, striking, biting, or shaking. Injuries include bruises, fractures, cuts, burns, or other physical injury.
2. Sexual Abuse: Any sexual act or sexual threat imposed on another person.
3. Emotional Abuse: An attack on a person's self-esteem e.g. through bullying, name calling, threatening, ridiculing, intimidating or isolating the person.
4. Neglect: Where a person is harmed by the failure to provide the basic physical or emotional necessities.

## Compromise of a Professional Relationship

Requesting or granting of a favor or privilege or the making of a concession or an agreement, which is not consistent with the assigned duties of an employee of Hilltop.

## Family Member of a Client

Any person related to a resident or client by blood or by marriage. This may include, but is not limited to, spouse, child, stepchild, adoptive child, foster child, parent, stepparent, adoptive parent, foster parent, brother, sister, niece, nephew or cousin.

## Grievance

A complaint; a cause of distress felt to afford reason for complaint or resistance.

## Prohibited Relationship

Any relationship between an employee of Hilltop and a client or family member or a client who is currently or who, within the past year, has been a client of Hilltop.

Relationships between former employees and Hilltop clients are generally prohibited for one year following the employee's departure from employment with Hilltop. Exceptions may be made on a case by case basis by Hilltop Management.

## Enforcement Officers

### Compliance Officer

Manager responsible for the ongoing monitoring of the regulatory requirements under HIPAA. Assists with ensuring all departments are in compliance and department leaders are informed of their responsibilities to uphold regulatory compliance, and that the HIPAA Committee is evaluating, documenting and revising HIPAA related policies and procedures as operations and programming changes throughout the organization. The Compliance Officer is the Chief Operating Officer.

### Privacy

Manager responsible for maintaining client confidentiality and security. Ensures that privacy policies are in place, and HIPAA training is provided routinely. Investigates privacy breaches. The Privacy Officer is the Sr. Director of Human Resources

### Security

Holds the overall responsibility for the security of individually identifiable health information, in electronic and all other forms. Approves and oversees the administration, implementation and selection of Hilltop's security controls for the Network. Ensures that the threats and risks to the confidentiality, integrity, and availability of ePHI are monitored and evaluated. The Security Officer is the Chief Financial Officer

### Information Technology Officer

Ensures that the Network activity is monitored and audited to identify Security Incidents and malicious activity. Assesses whether established security controls reasonably and appropriately protect against the risks identified for the Network. Participates in breach notification investigations, determinations, and responses.

### Ethics

Manager responsible for the maintenance of corporate ethical standards. The Ethics Officer is the Sr. Director of Learning.

### Fiscal Year

Hilltop's Fiscal Year is August 1 through July 31.

### Workweek

A seven day period starting at 12:01 a.m. Sunday morning and ending at 12:00 midnight Saturday evening. This period is significant for purposes of computing overtime hours for Non-Exempt Employees.

### Work Hours

Hours actually worked. This does not include Paid Time Off (PTO), Extended Illness Bank (EIB) hours, Family and Medical Leave or other leave periods, or holiday time not actually worked.

## 4.5 Code of Conduct

ID: 4.5	Human Resources
Effective Date: October 1, 2018	Last Revision: October 1, 2018

### Applicable Laws

**The conduct of Hilltop Community Resources, Inc. and its employees shall be in compliance with the laws and regulations relating to Hilltop’s business.**

### Duty to report suspected abuse and neglect

All employees of Hilltop Community Resources are expected to report any suspected abuse or neglect of children, at-risk adults, elders and all Hilltop clients in compliance with all applicable reporting laws. If you witness or become aware that an at-risk child or adult or elder has been or is at imminent risk of mistreatment (abuse or neglect), you must make a report to your Program Director or Human Resources immediately.

### Code of Ethics and Business Conduct

**Hilltop Corporate Policy 1.4, Code of Ethics and Business Conduct, states the code of conduct expected of all employees, volunteers and Board of Directors.** Portions of that Policy are included below for your ease of reference:

#### *Policy*

Hilltop Community Resources, Inc. is committed to being an ethical and responsible member of society. In order to ensure the highest standards of ethics, honesty, governance, and integrity are maintained, Hilltop has adopted this Code of Ethics Policy. We refer to the elements of this policy as our Code. Our Code provides the guidelines and standards for acceptable business conduct.

It is our policy that all employees, volunteers, and board members shall abide by and comply with the Organization’s Code.

When an employee, volunteer or board member believes they have discovered a matter that appears to be in violation of the Code, they have a duty to report the matter. This matter may be reported to the employee’s supervisor, the Ethics Officer or other management level employee.

Hilltop has also adopted a *Protected Disclosure & Whistleblower Policy*<sup>2</sup> to ensure that employees, volunteers and board members reporting a genuine concern or complaint will not be discriminated or retaliated against and have the opportunity to make such reports anonymously.

---

<sup>2</sup> Refer to Hilltop Corporate Policy 1.8, Protected Disclosure and Whistleblower, for more information.



### *Mission*

All programs and services of Hilltop Community Resources, Inc. shall support the mission of “leading through action to make a difference for people of all ages”.

### *Codes and Values*

Hilltop will achieve its mission by empowering our employees, volunteers and board members to take action, lead the way, and not always follow along the beaten path.

Hilltop’s core values revolve around DOING THE RIGHT THING, which is demonstrated by:

- Putting people first
- Building relationships
- Striving for excellence
- Challenging the status quo
- Taking responsibility for our actions

### *Safety and the Environment*

Hilltop is committed to full compliance with all safety and environmental laws and regulations. All employees, volunteers and board members are expected to comply with these laws, regulations and Hilltop policies.

Additionally, Hilltop has adopted a purchasing green and recycling policy. Refer to Hilltop Corporate Policy 1.21, Purchasing Green & Recycling.

### *Generally Accepted Accounting Principles (GAAP)*

Employees are expected to maintain accurate and reliable corporate records that comply with GAAP and Company policies and procedures.

The Company CEO, Chief Financial Officer (hereinafter “CFO”), and others identified by the CEO have specific legal obligations to manage its funds responsibly and prudently and to ensure the Company provides full, fair, accurate, timely, and understandable financial reports and exercises internal controls.

### *Confidential Information*

Employees, volunteers and board members may not divulge confidential or proprietary information except as authorized by the Chief Executive Officer.

### *Fundraising*

To the extent that Hilltop raises funds from the public or from donor institutions, Hilltop is truthful in its solicitation materials and will disclose important and relevant information to potential donors. Hilltop will respect the privacy concerns of individual donors and expend funds consistent with donor intent.

### *Conflicts of Interest*

No employee, officer, or director shall be, potentially be, or appear to be, subject to influences, interests, or relationships, which conflict with the best interests of Hilltop.

Employees, without prior approval of the Chief Executive Officer, may not serve as an officer, director, manager, employee, or agent of any company that is a competitor, supplier, or customer of Hilltop.

Employees should not engage in outside interests that divert time and attention from properly attending to Hilltop affairs.

Hilltop does not make loans to or guarantee obligations of Hilltop officers or directors.

### *Political Activities*

Hilltop considers itself an apolitical organization. As such, no Hilltop funds or assets will be contributed or used for the purpose of influencing any partisan election. With the approval of the Chief Executive Officer and notification to the Board of Directors, the services of a lobbyist to advocate for issues significant to the organization can be secured. For additional information, please refer to Hilltop Corporate Policy 1.9, Lobbying.

### *Inclusiveness & Diversity - Equal Employment Opportunity*

Hilltop promotes inclusiveness and diversity. Hilltop takes meaningful steps to promote inclusiveness in its hiring, retention, promotion, Board recruitment and constituencies served. Hilltop does not tolerate unlawful discrimination or harassment of any kind.

### *Loyalty*

All employees, volunteers and board members have a duty of loyalty to Hilltop and may not take personal advantage of any opportunity that properly belongs to Hilltop.

### *Kickbacks and Gratuities*

Hilltop considers it to be unethical and illegal for any employee to accept or offer payment, gift, gratuity, or employment to or from clients, vendors, contractors, or government officials as an inducement for preferential treatment. All offers for kickback and gratuity shall be reported to the Chief Financial Officer or a program director.

### *Transparency & Disclosure*

Hilltop may, at its sole discretion, disclose this Code of Ethics on its website, or other locations.

Hilltop provides appropriate and timely information to the public, and is responsive to reasonable requests for information.

Hilltop will comply with all requirements of the IRS pertaining to organizations with 501 (c)(3) nonprofit status.

### *Compliance and Reporting*

Any person who knows there to be violations to this Code, or has reason to believe there are violations of this Code or to any other Hilltop policy, is expected to promptly report the violation to Hilltop's Ethics Officer or any management level employee.

Reporting may be anonymous.

No employee or volunteer will be subject to retaliation, discrimination, or other adverse treatment for reporting known or suspected violations of this and other Hilltop policies and procedures.

All employees receive information concerning ethics, and the Ethics Officer name and contact information, during NET (New Employee Training). Inquiries may also be made to Human Resources.

*For more information, please refer to:*

- Hilltop Corporate Policy 1.4, Code of Ethics & Business Conduct;
- Hilltop Corporate Policy 1.8, Protected Disclosure & Whistleblower.

### **Anti-Violence and Weapons**

Hilltop strictly prohibits weapons of any type in its facilities, and at any Hilltop-sponsored events. This includes visible and concealed weapons, even those for which the owner has obtained the necessary permits.

This policy does not include an employee, who is legally permitted to possess a firearm, to store the firearm in a personal vehicle in Hilltop's parking lot. The firearm must not be in plain view, and the unoccupied vehicle must be locked.

While this list is not all-inclusive, "weapons" includes firearms, knives, any explosive materials, and any other objects that could be used to harass, intimidate, or injure another individual. Violators of this policy will be subject to disciplinary action, up to and including termination.

Employees must not engage in intimidation, threats or hostile behaviors, physical abuse, vandalism, arson, sabotage, use of weapons, bullying, or any other act, which, in management's opinion, is inappropriate to the workplace. In addition, employees must refrain from making bizarre or offensive comments regarding violent events and/or behavior.

Employees are expected to report any prohibited conduct to management immediately. Employees should directly contact proper law enforcement authorities if they believe there is a serious threat to the safety and health of themselves or others.

## Professional Behavior

Employees are expected to conduct themselves professionally at all times.

Employees must be in compliance with the prohibitions against alcohol and substance use.

All employees are required to make certain they are physically and mentally ready and prepared for work.

Each employee is expected to arrive to work on time, fulfill job duties to the best of ability, interact openly and honestly and avoid harassing behaviors.

### Business dealings between employees

**Employees are to refrain from seeking, and offering business dealings to, Hilltop co-workers, Hilltop's clients, or a client's family.**

This rule is stated to ensure employee and client privacy, and to ensure that activities do not create a conflict of interest, inadvertently disclose confidential information, or place employees of Hilltop in possession of knowledge that is private and protected from disclosure, or that may cause potential discrimination in the workplace, or violation of HIPAA privacy.

Any violations of these guidelines may be grounds for corrective action.

### Employee owned businesses

Employees of Hilltop may own or operate a business outside of the hours they work for Hilltop.

However, employees are to refrain from seeking (soliciting) business from co-workers, Hilltop's clients, or a client's family, without express CEO approval.

Hilltop establishes this policy for several reasons:

1. Providing business services may place one employee in the position of gaining personal knowledge of another employee or client, which is not appropriate within the workplace environment, such as financial situation, marital status, living arrangements, health status, or other personal information. Possession of such knowledge may cause discomfort at least and a conflict of interest or claims of discrimination at worst.
2. Hilltop employees may feel pressured, or may feel a risk of retaliation for not using the employee's business.
3. If a business relationship is established, yet eventually does not satisfy one or the other of the co-workers, Hilltop does not want a position where employees are unhappy with the other for something that occurred outside work.

### Examples

**Example 1.** If an employee owns a house cleaning service, it is not appropriate to provide services to another employee, employee's family, clients or client's family. Being in a home, or around a family, places an employee in the position of gaining personal knowledge of the

employee or client, such as health status, financial situation, marital status, living arrangements or other personally held knowledge.

**Example 2.** If an employee owns a car wash, it would not be appropriate to ask (solicit) your direct reports or your co-workers/colleagues to use your car wash, as they may feel pressured or that you may retaliate against them for not using your business. However, colleagues may select your car wash on their own, and use it, because often the use would be without your knowledge and you are not gaining any personal information while the car wash is operating.

### Employee Code of Ethics

Hilltop, through its workplace standards, policies and processes, seeks to promote an ethical corporate culture among its employees and volunteers, involving both internal and external relationships.

Hilltop expects employees and volunteers to provide care and service grounded in fundamental ethical principles.

Hilltop asks that employees and volunteers:

1. Commit to remain sensitive to, and be respectful of, the ethnic, cultural, religious and lifestyle diversity of employees, volunteers, clients and client family members.
2. Respect and protect the confidentiality of information and privacy.
3. Refrain from giving or accepting gifts of value or monetary compensation or to solicit or accept loans of any sums of money from any client or client family.
4. Honor the intent of benefactors and donors who support Hilltop programs.
5. Maintain professional boundaries with clients and client family members.
6. Become familiar with Hilltop's Corporate Policies, including but not limited to:
  - a. Hilltop's Corporate Policy 1.4, Code of Ethics and Business Conduct;
  - b. Hilltop's Corporate Policy 1.5, Commitment to Clients;
  - c. Hilltop's Corporate Policy 1.6, No Proselytizing or Faith Based Requirement;
  - d. Hilltop's Corporate Policy 1.7, Compliance & Protection from Fraud; and
  - e. Hilltop's Corporate Policy 1.8 Protected Disclosure & Whistleblower.
7. Become familiar with all applicable procedures and processes established for the purpose of conducting the business of Hilltop.

### Harassment Prohibited

All employees are required to prevent harassment in the workplace.

Harassment of Hilltop employees, volunteers or Hilltop's clients is prohibited. This applies to all employees, including managers, supervisors, co-workers, and non-employees such as customers, clients, vendors and consultants.

There are two types of workplace harassment: hostile environment or sexual harassment.

**Unlawful harassment** includes verbal or physical conduct which has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

Harassment includes, but is not limited to:

- Communications, implicit or explicit about another's sex life, preferences or appearance and whether in:
  - written form, such as cartoons, posters, calendars, notes, letters, e-mail, etc;
  - Verbal form, such as comments, jokes, foul or obscene language or gestures, gossiping or questions about another's sex life, or repeated unwanted requests for dates, and;
- Physical gestures and other nonverbal behavior, such as unwelcome touching, grabbing, fondling, kissing, massaging, and brushing up against another person's body.

**Sexual harassment** is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

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

Hilltop prohibits retaliation against any employee for filing a complaint for harassment, or for assisting in a complaint investigation.

If you believe harassment has occurred, please file a report. Please refer to Hilltop's Corporate Policy 1.8, Protected Disclosure and Whistleblower.

### [Protected Disclosure & Whistleblower](#)

Hilltop encourages honest reporting of violations of any law, any illegal or unethical conduct, violation of Hilltop Code of Ethics, or violation of any Hilltop policy.

Reporting such concerns is known as whistle blowing.

Hilltop adopted a policy designed to provide a mechanism for employees to 'blow the whistle,' while at the same time protecting employees from retaliation for making a report.

### Definition

A whistleblower is a person or entity that makes a complaint relating to a protected disclosure.

A protected disclosure is a communication made in good faith that discloses a potential violation of an organization's ethics and policies. The disclosure may be related to suspected violations of laws, regulations, ethics, or the organization's policies.

### Empowered Employees

Hilltop empowers its employees to prevent, investigate, detect, report, and correct any and all illegal or unethical activities, be they accidental or intentional, which could be considered fraud, waste or abuse of local, state, or federal funds.

### Duty to report suspected violation of law, code or policy

Any employee suspecting, in good faith, that a violation of a law, Hilltop's code or policies, or other unethical or concerning situation has, will, or may likely occur has a duty to report the violation to Hilltop and he or she shall be able to do so without fear of retaliation, harassment, or dismissal.

*For more information, please refer to: Hilltop Corporate Policy 1.8, Protected Disclosure & Whistleblower.*

### Procedure

**You have many options to file a concern, or complaint:**

- Contact your supervisor, program director, or HR Business Partner;
- Contact Hilltop's Ethics Officer in person or by email.
- Contact Hilltop's Compliance Officer in person or by email.
- Email the Vice Chair of the Board of Directors at: [boardethics@htop.org](mailto:boardethics@htop.org)

If you are not comfortable making a genuine complaint about a violation of the Hilltop Code for any reason, or if you are not satisfied with Hilltop's response, Hilltop has a mechanism for you to pursue the matter, and to do so anonymously if you prefer.

### Things to know

- Any good faith report, concern or complaint is fully protected by this policy, even if the report, question or concern is, after investigation, not substantiated. Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code of Ethics, Hilltop policy, or law.
- Protection under this policy does not extend to false or bogus allegations knowingly made by a whistleblower. Person making allegations in bad faith or intention may be subject to disciplinary actions.
- Hilltop will take no disciplinary action or otherwise change the terms and conditions of employment against employees in retaliation for making a report of fraud, waste, or

abuse with any merit. Nor will Hilltop tolerate any harassment from other employees directed at an employee who has reported a legitimate concern.

- Hilltop will use its best efforts to protect the confidentiality of the complainant for any good faith report. Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

### Hilltop Management Responsibilities after report is made

1. It is the responsibility of the Compliance Officer, the Ethics Officer and the Vice Chair of the Board of Directors to maintain a log of all protected disclosure complaints tracking their receipt, investigation, and resolution. The log shall be kept according to the Records Management Policy.
2. The Senior Leadership and the Executive Committee shall be informed of complaints or reports and the action taken.
3. Upon the receipt of the complaint, Hilltop's Compliance Officer or the Hilltop Ethics Officer shall investigate whistleblower complaints.
4. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.
5. The complainant will be informed that follow-up has or is occurring within two weeks after the Ethics Officer, Compliance Officer or Board Officer has received the complaint or report.

Complaints that are found to not be an ethical or legal issue but which need to be addressed will be done through the Problem Resolution Process.

In the event you do not feel comfortable speaking with the Compliance or Ethics Officers, or you are not satisfied with the response, you are encouraged to report to the Vice Chair of the Board of Directors.

### Dress

Employees shall dress and groom appropriately, so as to present a professional, businesslike image to clients, visitors, customers and the public. Acceptable personal appearance is an ongoing requirement of employment with Hilltop.

All employees are expected to present a neat appearance, and are not permitted to wear ripped, frayed or disheveled clothing, clothing with obscene writing or graphics, revealing or excessive clothing that is inappropriate for business image, or that may pose a safety risk.

Depending on the nature of the job, certain employees may be required to meet special dress, grooming or hygiene standards. Uniforms and protective clothing may be required for certain positions.



You should refer to your assigned department or program manual, and consult with direct supervisors for any exceptions applicable to the department to which you are assigned.

Hilltop will reasonably accommodate workplace attire for individually held religious beliefs. Employees who wish to request a workplace attire accommodation must consult with Human Resources.

Employees not in compliance with the attire or grooming standards set by Hilltop will be required to leave the premises to change clothing. In such event, employees will not be paid for the time required to change clothing.

### Personal Habits

Be aware that your personal habits may impact others.

Wearing too much perfume/cologne, speaking loudly, tapping your pen, talking to yourself, slurping your drink, etc. may be irritating to your co-workers.

You are encouraged to maintain a high sense of personal awareness and your co-workers are encouraged to let you know if they find any of your personal habits annoying.

### Work area organization

All employees are expected to keep their work area free of hazards and safety violations.

## 4.6 Alcohol and Substance Use

ID: 4.6	Human Resources
Effective Date: October 1, 2018	Last Revision: October 1, 2018

### Prohibited use

While conducting the day to day business of Hilltop, no employee may use, possess, distribute, sell, or be under the influence of alcohol or drugs.

Specific exceptions may be granted by a Hilltop manager. For example, when alcohol may be served at Hilltop sponsored events and the employee is required to attend.

Violations may lead to corrective action, up to and including immediate termination of employment. Such violations may also have legal consequences.

### Prescription drugs

The legal use of prescribed drugs is permitted on the job only if it does not impair ability to perform the essential functions of the job effectively and in a manner that does not endanger clients or other individuals in the workplace.

### Alcohol, marijuana or other substance

Possession of a medical marijuana card does not permit employees to be under the influence of marijuana at work.

Employees who smell of, or appear to be under the influence of alcoholic beverages, marijuana, or other illegal substances while performing the duties of assigned employment may be required to undergo a reasonable suspicion drug screening test, and may be suspended or discharged regardless of the level of impairment or influence of alcohol, marijuana or other illegal substances.

Violations of this policy may lead to disciplinary action, up to and including immediate termination of employment. Such violations may also have legal consequences.

### Report required

Under the Drug-Free Workplace Act an employee who performs work for a government contract or grant must notify Hilltop of a criminal conviction for drug-related activity occurring in the workplace. All Hilltop employees must notify Hilltop of any criminal conviction for drug-related activity. The report must be made within five days of the conviction.

*For more information, please refer to:*

- *Hilltop Corporate Policy 1.4, Code of Ethics & Business Conduct;*
- *Hilltop Corporate Policy 1.19, Employment.*

## 4.7 Commitment to Clients & Client Rights

ID: 4.7	Human Resources
Effective Date: October 1, 2018	Last Revision: October 1, 2018

**Each employee must recognize and respect that Hilltop’s clients have a variety of backgrounds and needs.**

### Services for Clients

Hilltop provides services as indicated for clients within the policies and procedures of the program and the organization.

### Client Rights

**All employees will become familiar with, and respect the following rights of Hilltop clients:**

1. All clients will be treated with respect. Clients will be listened to and their ideas and opinions valued.
2. No client shall be discriminated against on the basis of age, gender, race, culture, religion, or sexual orientation.
3. Employees will be professional in their actions through their use of language, presentation, and manner.
4. Food, rest, and toileting will not be denied or forced upon a client as a means of punishment.
5. Separation, when used as discipline, will be brief and appropriate for the client’s age.
6. Client safety shall at all times be a priority for staff.
7. Conflicts will be resolved fairly and promptly. Clients shall report and management will act on any breaches of these standards of behavior through established procedures.

*For more information, please refer to:*

- *Hilltop Corporate Policy 1.5, Commitment to Clients & Client Rights.*

### No Proselytizing or Faith Based Requirement

**Employees and volunteers of Hilltop shall not proselytize to any client.**

Hilltop honors each client’s faith and will accommodate and facilitate participation as possible.

Hilltop Community Resources, Inc. is a 501(c)(3) not-for-profit corporation and is not a faith based organization. Hilltop serves clients of all faiths and beliefs at many facilities and through many programs.

Hilltop does not provide services with a religious or faith based requirement, nor does Hilltop require clients to attend religious activities or instruction in exchange for, or as a requirement to receive any services that Hilltop provides.

### *Definition*

Proselytize: to induce someone to convert to one's faith; to recruit or convert to a new faith, institution or cause; espouse, persuade, talk into, convert, convince.

*For more information, please refer to:*

- *Hilltop Corporate Policy 1.6, No Proselytizing or Faith Based Requirement.*

## Confidentiality

As an employee of Hilltop Community Resources, Inc., you may have access to confidential Client information and Client records.

**Employees are expected to know the HIPAA policies and practices specific to his or her assigned department.**

**Every employee and volunteer has a responsibility to manage and maintain all information in a confidential manner.**

All applicable Health Insurance Portability and Accountability Act (HIPAA) privacy and security requirements will be met, and the personal health information of clients will be shared only through appropriate HIPAA processes.

No information shall be released to any outside individuals or agencies without a properly signed Release of Information form or appropriate court order. A release of information form is not necessary for meetings where the resident/client and/or legal representative are present.

Infractions by employees will result in immediate disciplinary action up to and including termination.

*For more information, please refer to:*

- *Hilltop Corporate Policy 1.20, HIPAA Privacy Practices;*
- *Your assigned department procedure handbook.*

## Client Protection

**All employees of Hilltop Community Resources, Inc. must share Hilltop's commitment to providing services to clients in a safe and professional manner.**

All employees, Board members, and volunteers of Hilltop must ensure the physical and emotional well-being of clients of Hilltop at all times.

Each employee and volunteer is expected to provide client services and address behavioral concerns with clients within the policies and procedures of the program and organization.

- Client abuse is unacceptable employee performance and will result in disciplinary action up to and including termination of employment.

- Clients shall not be subjected to physical or emotional harm or humiliation. Employees or volunteers shall not use or be permitted to use, corporal or other harsh punishment, including but not limited to pinching, shaking, spanking, punching, biting, kicking, rough handling, hair pulling, or any humiliating or frightening method of discipline.
- Clients shall not be subjected to abusive or foul language from any individual. Employees shall endeavor to intervene and remove a client from the area of another client or visitor if employees become aware of the use of language which humiliates, belittles or degrades another client.
- Verbal abuse and derogatory remarks about the clients are not permitted. Employees should not use prejudicial or oppressive behavior, social media, language, clothing or other forms of inappropriate communication.
- Any employee who has an allegation of abuse or neglect made against him or her or who has engaged in behaviors inconsistent with job duties, placing a client at risk to injury or maltreatment, may be placed on administrative leave. This procedure ensures the safety of all clients and employees during the investigative stage (Internal and/or External) of any report of abuse, neglect or behavior that may have placed a client or employee at risk of injury or maltreatment. The employee in question will remain on administrative leave until such time that a finding can be made regarding the allegations. If client abuse or neglect is determined to have happened, disciplinary action up to and including termination of employment will result.

*For more information, please refer to:*

- *Hilltop Corporate Policy 1.5, Commitment to Clients & Client Rights;*
- *This handbook: Definitions and Corrective Actions.*

### Relationships between Clients & Employees

There shall be no financial or business relation between employees and clients of Hilltop, or family members of clients.

Hilltop establishes this policy to avoid potential conflict of interest and to avoid compromise of professional relationship.

Some examples include, but are not limited to:

- Business dealings on either a profit or nonprofit basis.
- Fraternization after working hours or away from work.
- Compromising personal contact, such as consumption of alcoholic beverages or engaging in a sexual relationship with a client or his /her family member.
- Violations of contraband statues, policies, procedures, or operational memorandums.
- Meeting with juveniles on escape status for any reason other than to assist in their apprehension.

- The granting of favors or services to a client which, in the view of other employees and/or clients, is preferential in nature by either not being given or being only minimally given to other clients who have similar circumstances, including the bringing of gifts; the performing of personal errands within or outside the agency; extending extra privileges; or extending significantly more counseling time to one individual than to other clients.
- Accepting gifts, discounts, favors, loans, or services from a client.

Exceptions may be made for certain situations by the CEO. Infractions of this policy will result in disciplinary action up to and including termination of the employee.

Relationships between former employees and Hilltop clients are generally prohibited for one year following the employee's departure from employment with Hilltop. Exceptions may be made on a case by case basis by a Sr. Director.

*For more information, please refer to:*

- *Hilltop Corporate Policy 1.5, Commitment to Clients & Client Rights;*
- *This handbook: Definitions and Corrective Actions.*

## Client Complaints or Concerns

Hilltop strives to live up to its values and always do the right thing. Hilltop knows that sometimes it may fall short. Hilltop welcomes feedback from concerned people – clients, family members, or the public. In these cases, Hilltop requests the concerned persons let Hilltop know immediately. The process to report a concern is called a “grievance.”

Verbal reporting of a grievance is acceptable, if made to a Hilltop manager. Grievances may also be placed in writing.

At any point in time, a concerned person may bring concerns to Hilltop's Board of Directors.

Employees should be aware that Hilltop may receive reports or concerns relating to employee conduct.

## What Hilltop will do, when a report is made

1. All written and verbal grievances will be treated confidentially and will immediately be referred to the appropriate Hilltop manager.
2. The appropriate Hilltop manager will be assigned to investigate and report.
3. If a grievance is anonymous, Hilltop personnel will investigate based on the information provided and to take appropriate action.
4. The person raising the issue will be contacted within 5 – 7 business days to inform of the status of Hilltop's review of the grievance.

## 4.8 Confidentiality

ID: 4.8	Human Resources
Effective Date: October 1, 2018	Last Revision: October 1, 2018

As an employee of Hilltop Community Resources, Inc., you may have access to confidential information from:

1. Client information and client records;
2. Other Hilltop employee personnel information and records; and/or
3. Hilltop financial records or privileged corporate information.

**Every employee has a responsibility to manage and maintain all information in a confidential manner.**

**Infractions will result in immediate disciplinary action up to and including termination.**

### Client information

Employees are required to meet all applicable Health Insurance Portability and Accountability Act (HIPAA) privacy and security requirements. Only when necessary, may employees share personal health information of clients through appropriate HIPAA processes.

- Every employee is expected to know the Client - HIPAA policies and practices specific to his or her assigned department.
- No information shall be released to any outside individuals or agencies without a properly signed **Release of Information form** or appropriate court order. (A release of information form is not necessary for meetings where the resident/client and/or legal representative are present.)

### Other information

Employees are also expected to maintain information learned through your job in confidence and utilize professional discretion and exercise a loyalty to Hilltop.

Employees are expected to maintain the privacy of other employees.

Employees are also expected to maintain in confidence the business dealings of Hilltop.

*For more information, please refer to:*

- *Hilltop Corporate Policy 1.4, Code of Ethics & Business Conduct;*
- *Hilltop Corporate Policy 1.5, Commitment to Clients; and*
- *Information in this handbook.*

## HIPAA Privacy Practices

See Hilltop Corporate Policy 1.20, HIPAA Privacy Practices, and, Hilltop All Employee HIPAA Policies and Procedures for more information on this subject. For your ease of reference, portions of the Policy are included below:

**Hilltop expects all employees, volunteers and board members to reasonably safeguard personal identifiers from intentional or unintentional use or disclosure.**

Hilltop provides a Notice of Privacy Practices to clients and employees. Contact Human Resources for a copy of the Notice of Privacy Practices to employees. Contact the program for a copy of the client's Notices of Privacy Practices.

Hilltop is committed to protecting the privacy of client and employee health information which is sometimes referred to as Protected Health Information ("PHI")<sup>3</sup>. A part of this commitment involves compliance with the **privacy standards** contained in the regulations promulgated under the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the first comprehensive federal protection of health information. The regulation is known as the Privacy Rule.

Hilltop recognizes its status as a Covered Entity under the definitions contained in the Act. Hilltop also acknowledges a duty to support and facilitate the timely and unobstructed flow of health information for lawful and appropriate purposes.

Hilltop acknowledges a duty and responsibility to protect the privacy and security of the following personal identifiers:

- Name, address, telephone number;
- Social security number;
- Date of birth;
- Admit date;
- Other identifying number or symbol.

Hilltop established the following written procedures with respect to PHI:

- Designation of Privacy Officer;
- Physical safeguards;
- Technical safeguards;
- Follow the KYSS rule;
- Breach notification;
- Release of information;
- Violations of policy.

See Hilltop Corporate Policy 1.20, HIPAA Privacy Practices, for more information on this subject. Refer to your department, program or supervisor for specific HIPAA-related processes and procedures within your work area.

*For more information, please refer to:*

- *Hilltop Corporate Policy 1.20, HIPAA Privacy Practices.*
- *Hilltop All Employee HIPAA Policies and Procedures*

---

<sup>3</sup> Credit for portions of this policy to American Health Care Association (2017) retrieved from: [https://www.ahcancal.org/facility\\_operations/privacysecurity/Pages/HIPAAPolicyProcManual.aspx](https://www.ahcancal.org/facility_operations/privacysecurity/Pages/HIPAAPolicyProcManual.aspx)



## 4.9 Representing Hilltop

ID: 4.9	Human Resources
Effective Date: October 1, 2018	Last Revision: October 1, 2018

### Social Media, Media Interaction and Public Appearances

**Only designated employees of Hilltop are authorized to make public statements on behalf of Hilltop.**

**This includes statements on social media, or in response to social media postings.**

Employees may not consent to or engage in any public relations activity on behalf of Hilltop with clients, suppliers, distributors or others without Hilltop management approval.

To ensure that your activities do not create a conflict of interest or inadvertently disclose confidential business information, without prior approval from your manager and the Marketing & Communication team, you may not:

- Publish, post or link to any Hilltop material, refer to Hilltop clients, employees or volunteers in written or electronic format (including books, articles, podcasts, webcasts, blogs, website postings, photos, videos or other media);
- Make speeches, give interviews or make public appearances on behalf of or as a representative of Hilltop and make mention Hilltop's operations, clients, products or services.

Employees tasked with working with Hilltop social media will ensure all posting:

1. Respects client confidentiality and all HIPAA guidelines;
2. Protects sensitive or personal information of clients, employees and others;
3. Avoids advertisements, sponsorships and endorsements;
4. Stays within area of expertise;
5. Is monitored, especially user comments;
6. Is accurate;
7. If mistakes are made, they are corrected;
8. Is considerate;
9. Respects copyrights and trademarks.

*If you are making comments on a Hilltop social media page, you should expect*

1. Hilltop's Marketing & Communication department to review your comment.
2. Your comment to become a public record.
3. Hilltop reserves the right to delete comments or submissions that:
  - a. contain vulgar language, personal attacks of any kind, offensive comments, comments that target or disparage any group;
  - b. are spam, or include links to other sites;

- c. are clearly off topic;
  - d. advocate illegal activity;
  - e. promote services, products or political organizations;
  - f. infringe on copyrights or trademarks;
  - g. use personally identifiable medical information;
  - h. contain case specific and or other confidential information;
  - i. Purport to reflect the opinions and positions of Hilltop or its officers and employees.
- If a representative from the media contacts you seeking a statement on behalf of Hilltop, you must refer them to the Marketing & Communication Team, who will take care of connecting the media with the authorized individuals.
  - Hilltop has public disclosure requirements for its senior leadership and Board of Directors and all business officers, as well as employees who may be in the position to review confidential records, or medical records of Hilltop's clients.

## Communication & Marketing

All Hilltop communication shall reflect the organization's mission and values, be effective, consistent, and maintain consistent branding messages.

Hilltop communications will avoid implied endorsement of products, businesses, religious and political entities and non-approved causes.

Only Hilltop Marketing and Communication may prepare and disseminate communications concerning Hilltop, especially communication and marketing material using Hilltop name or logo.

### *Things to keep in mind*

1. Contact the Marketing & Communication department:
  - a. Before using Hilltop's name in any way that implies endorsement of non-Hilltop agencies, services or other causes;
  - b. If you wish to send out communication using Hilltop's logo, program name or program logos;
  - c. If you are hosting an event, fundraising, or supporting Hilltop programs and wish to display signage, banners, or issue a media release.
2. As an employee, you will receive internal communication from Hilltop's Marketing & Communication department, in the following ways:
  - Hilltop employee portal;
  - Hilltopics newsletter;
  - Hilltoppers email communications.

## Privacy: use of Hilltop name

Employees shall not use Hilltop's name, facilities or established business relationships, logo, trademarks or contact lists for commercial purposes unrelated to your job, including outside work.

Use of Hilltop’s name, facilities or relationships for charitable or pro bono purposes can be made only with prior approval from your Senior Manager, and only after any other necessary notification and approvals are provided as required to insure that there is no conflict of interest or violation of privacy.

Any violations of these guidelines may be grounds for corrective action.

## Lobby activities by designation only

Employees not designated by job description or by direct assignment may not lobby on behalf of Hilltop.

Nothing written here is intended to prevent an employee, as an individual voter and resident of the State of Colorado, from expressing personal views in writing to or calling a state senator, representative, county commissioner, city councilperson or other elected official to advocate a position or to discuss legislation.

Employees shall be clear that the position taken is a personal view, and not offered in connection with professional employment or that of Hilltop.

### *Lobbying*

Seeking to influence on an issue. “Attempting to influence legislation,” IRS, Lobbying, 2017<sup>4</sup>).

### *Direct lobbying*

Communication with a legislator that expresses a view about specific legislation.

Examples of direct lobbying include visiting a legislator to discuss a particular bill or contacting a legislator to ask them to support a bill. The key element of lobbying is mentioning or discussing specific bills or pieces of legislation.

### *Grassroots lobbying*

Communication with the public that expresses a view about specific legislation and includes a call to action.

Examples of grassroots lobbying include requesting in a newsletter that readers contact their legislator to ask for more funding for domestic violence programs or giving a television interview and stating your organization’s support for a particular bill.

*For more information, please refer to:*

- *Hilltop Corporate Policy 1.9, Lobbying.*

---

<sup>4</sup> IRS, 2017. Retrieved from <https://www.irs.gov/Charities-&-Non-Profits/Lobbying>.

## 4.10 Use of Company Property

ID: 4.10	Human Resources
Effective Date: October 1, 2018	Last Revision: October 1, 2018

### Hilltop Buildings and Equipment

**Hilltop expects that you treat Hilltop's equipment, buildings and surroundings with care.**

All employees are expected to respect Hilltop's buildings, office furniture, outdoor landscaping and parking lots. Employees shall refrain from conduct that may harm or degrade Hilltop property.

Some employees may be issued portable electronic devices, such as a cell phone, pager, laptop, camera or other electronic device to carry out work for Hilltop.

If you are assigned devices, you are expected to treat them with care. When you terminate your employment with Hilltop, you are expected to return all Hilltop equipment.

### Use of Computers and Office Equipment

**All employees using any Hilltop property or equipment shall have no expectation of privacy.**

**Hilltop may monitor, and record and store data related to all use of its property, including but not limited to email and phone systems.**

Hilltop owns all company computers, copiers, phones, desks, and other resources you use in connection with your job. Hilltop may invest in other specialized equipment to enable employees and representatives of Hilltop to further Hilltop's purpose.

Access to Hilltop owned property and equipment, including but not limited to email, internet, telephone, two way radio, and cell phone is provided to Hilltop employees whose duties require it for the conduct of Hilltop business.

Use of such resources by employees constitutes consent for Hilltop to monitor, inspect, audit, collect and remove any information without permission or further notice.

### Generally prohibited activities

- Using a logon ID and password that is not your own.
- Stealing or copying electronic files without permission. Hilltop's data, files, or software may not be copied onto private computers or other computers not owned by Hilltop, or onto any other media, without prior permission from a Senior Manager.
- Performing non-work related activities on Hilltop equipment and devices. This may include playing of electronic games, streaming media.
- Performing activities intended to degrade Hilltop's system performance.
- Performing activities intended to, or which may result in, the circumvention of security or access controls of Hilltop or any other organization. This prohibition includes the

possession or use of hardware or software tools intended to defeat software copy protection, discover passwords, identify security vulnerabilities, decrypt encrypted files, or compromise information security by any other means.

- Writing, copying, executing, or attempting to introduce any computer code designed to self-replicate, damage, or otherwise hinder the performance of or access to any Hilltop computer, network, or information.
- Performing any act that may defame, libel, abuse, embarrass, tarnish, present a bad image of, or portray in false light, Hilltop or any person.
- Acquiring, browsing, posting, or sending sexually explicit or sexually oriented material, hate based material, hacker-related material, racist or offensive material, chain letters, unauthorized mass mailings, malicious code, or other material that Hilltop may determine, in its sole and absolute discretion, to be off-limits.
- Unencrypted transmission or conveyance of protected health or financial information. This includes but is not limited to conveying protected health or financial information via unencrypted email or through an unsecure website or software application.

Violation of any of these provisions is unacceptable conduct and may be subject to disciplinary action up to and including immediate dismissal. Employees may also be subject to legal repercussions or criminal prosecution.

## Software

All Hilltop employees, volunteers and contractors shall abide by software copyright laws and shall not obtain, install, replicate, or use software except as permitted by the software licensing agreements.

All software used on Hilltop's information resources shall be procured and installed with the approval of Hilltop's Information Technology department, and shall be licensed, and registered in the name of Hilltop.

Employees shall not use personally owned software on Hilltop information resources. This includes, but is not limited to: purchased and licensed applications; shareware; freeware; downloads from bulletin boards, Internet, Intranet, FTP sites, and other personally-owned or controlled software.

Violation of any of these provisions is unacceptable conduct and may be subject to disciplinary action up to and including immediate dismissal. Employees may also be subject to legal repercussions or criminal prosecution.

## Specialized Equipment

Hilltop specialized equipment must remain on Hilltop premises and may not be removed.

## Conference Rooms

Employees may use Hilltop facilities, including conference rooms, for Hilltop related business.

Employees may not use conference rooms or Hilltop facilities for outside interests that divert time and attention from properly attending to Hilltop affairs.

Any proposed after business hours use of Hilltop facilities and properties must be discussed with your supervisor.

## Records

Every employee is responsible for making and keeping records related to work performed for Hilltop.

Hilltop departments and programs will keep records for a variety of reasons. Not every employee will make the same type of record, keep paper files, or come in contact with client records. However, employees must be aware of the responsibilities associated with records within his or her assigned department or program.

### *Creation*

You are expected to create the necessary records to do business for Hilltop. This may include recording transactions, decisions, actions taken, and documentation of activities for areas which you are responsible.

### *Maintenance*

You should maintain and take care of the records so that information can be found when needed. This means setting up good directories and files, and filing materials (in whatever format) regularly and carefully in a manner that allows them to be safely stored and efficiently retrieved when necessary.

### *Disposition and Archive*

Carry out the disposition of records under your control in accordance with the guidelines established in your department or program. Do not destroy records without permission from your supervisor.

## Hilltop vehicles

Hilltop owns vehicles and may allow employees to use Hilltop owned vehicles when certain licensure and driving requirements are met by the employee.

Access to Hilltop owned vehicles may be revoked by Hilltop at any time, in Hilltop's sole discretion.

## Driving Requirements

**Employees driving for Hilltop programs must have appropriate training and licensure.** The Transportation department of Hilltop is responsible for establishing procedures, processes and requirements for driving.

Driving privileges may be revoked by Hilltop at any time, in Hilltop's sole discretion.

Before driving for Hilltop, the following requirements shall be met by Employees:

1. An employee driving a Hilltop vehicle or transporting clients in any vehicle shall be at least 21 years of age.
2. Employee must hold a valid Colorado driver's license, provide proof of personal vehicle insurance, and possess an acceptable Motor Vehicle Record.
3. Employee must participate in classroom training and pass examinations, the content and nature of which determined by Hilltop.
  - a. Generally, training and examination will expect employees to show satisfactory understanding of policies and procedures and demonstrate appropriate driving capability and skill.
4. Hilltop may require an employee to pass an on-the-road driving test of driving skills.
5. The Hilltop Transportation database and the Employee's personnel file must contain copies of:
  - a. Valid Colorado driver's license;
  - b. Proof of personal vehicle insurance;
  - c. Motor Vehicle Record;
  - d. Hilltop driving test results.
6. Expired documentation will result in revoked driving privileges.
7. Supervisors and employee are responsible for obtaining current documentation and providing the documentation to Hilltop's Transportation department.

#### *Acceptable motor vehicle record*

Hilltop has determined that an acceptable motor vehicle record means:

1. No (0) major violations in the prior three (3) years;
2. Not more than three (3) moving violations in the prior three (3) years;
3. Not more than two (2) moving violations and one (1) at-fault accident in the prior three (3) years;
4. Not more than two (2) at-fault accidents in the prior three (3) years.

Major violations are defined as including:

- Leaving the scene of an accident
- Vehicular Homicide
- School Zone violations
- Aggravated assault with a motor vehicle
- Operating a vehicle without the owner's authority (grand theft)
- Fleeing from or attempting to elude a police officer
- Reckless or careless driving
- No proof of insurance coverage

## Driver's License

Hilltop defines a 'valid driver's license' as a Colorado driver's license not under suspension, revocation, cancellation, denial, or expired.

Employees shall, within 24 hours, or the next working day, inform supervisor of any suspension, revocation, or license expiration.

**Employee shall no longer drive for Hilltop if an employee's license is suspended, revoked or expired, or if the employee is no longer certified.**

## Accidents

**Employees shall immediately report any accident that occurs while the employee is driving for Hilltop purposes.**

This reporting requirement includes accidents that occur in a Hilltop vehicle, or in a private vehicle driven while on Hilltop business.

The report of accident shall be made to supervisor and to the Transportation coordinator.

## Parking tickets; violation of traffic laws

Hilltop is not responsible for any traffic violations or parking tickets acquired by employees who act in violation of city or town ordinance, state or federal laws as a result of the driving habits of the employee or the employee's operation of a private motor vehicle.

Employees are expected to comply with all procedures relative to using Hilltop vehicles.

## Use of Portable Electronic Devices in Motor Vehicle

**Hilltop prohibits the use of all cell phones / electronic devices while driving a motor vehicle on company business.** A passenger may make or take calls for the driver, provided the interaction does not affect the driver's performance.

For purposes of Hilltop's definition, the term "use" includes: all functions of the device, including but not limited to, phone calls, text messaging (SMS), email, internet use, MMS, and camera use.

Hilltop considers the term "driving a motor vehicle" to include:

- Driving a Hilltop car, whether on business or not;
- Transporting a Hilltop client, resident or coworker in any vehicle, personal or otherwise;
- Driving a personal vehicle while performing duties as a Hilltop employee.

## Exception

The use of headsets or hands-free devices while driving is permissible, if the use of the hands free device does not cause undue distraction, conversations do not interfere with the driver's ability to drive safely and road conditions do not threaten safety.

Cell phones may be used for calls placed to 911.



*For more information, please refer to:*

- *Your department, program or supervisor;*
- *Hilltop's Transportation Coordinator.*

## Purchasing Green & Recycling

Hilltop encourages waste prevention in all Hilltop departments and programs.

Hilltop will support the purchase of recycled and environmentally preferred products, so long as the product performs satisfactorily and is available at a reasonable, competitive price.

The Purchasing Department may assist Hilltop employees, departments and programs with review and recommendations for the purchase of environmentally preferable products.

### Employee Participation

Hilltop employees are encouraged to:

- Generate less waste material.
- Adopt and support department and program-level based:
  - Recycling of waste material.
  - Use of recycled supplies and materials.
- Consider durability and reparability of the products being purchased.
- Conduct routine maintenance on products and equipment to increase the useful life and reduce waste.
- Send and store information electronically when possible.

For more information, please refer to:

- Hilltop Corporate Policy 1.21, Purchasing Green and Recycling.
- Your department, program or supervisor.

## 4.11 Absences, leaves and holidays

ID: 4.11	Human Resources
Effective Date: October 1, 2018	Last Revision: October 1, 2018

### Attendance, Absenteeism and Tardiness

All employees are expected to report promptly for duty as scheduled.

Reporting promptly for duty means that employees arrive at their Hilltop site with sufficient time to be at their assigned work area at the scheduled starting time, and remain until their scheduled workday is completed.

Review your department rules for attendance, and discuss the rules with your supervisor.

Failure to comply with this requirement handicaps the functions of the department and Hilltop, and employees may be disciplined, up to and including termination.

#### *What to do if you know you will be absent or tardy:*

1. Notify your supervisor or departmental designee(s) when you discover you will be unable to report at the expected time to perform your job. Notification should be in the form established by your department.
2. Where guidelines are not established, telephone to notify your department supervisor or designee, at least one hour in advance of your scheduled starting time.
3. Notify each time you may be tardy/late, or absent due to illness or other reason.
4. For extended absence, it is expected that you advise your supervisor when you expect to return to work.

#### *Definition*

Absenteeism: Voluntary, or involuntary, absence from a scheduled work shift, or failure to report to work. An absence of more than one consecutive day or shift caused by the same illness or reason may be considered one absence.

#### Holiday Pay

Hilltop recognizes six holidays for all employees. These holidays are:

1. New Year's Day (January 1)
2. Memorial Day (last Monday in May)
3. Independence Day (July 4)
4. Labor Day (first Monday in September)
5. Thanksgiving Day (fourth Thursday in November)
6. Christmas Day (December 25)

Holiday pay will be paid to non-exempt employees working the designated holiday.

Exempt employees do not qualify for holiday pay.

Holiday pay will be paid for actual hours worked within the designated holiday. The holiday is considered to be the actual legal holiday from 12:01 a.m. to midnight of that calendar day.

The amount paid is based on one and one-half (1½) times the employee's regular rate of pay (as of the date of the holiday) times the number of hours worked on the actual holiday. If the holiday and overtime hours worked fall on the same day, only one premium rate of pay for that day will apply.

PTO hours will be used for scheduled hours not worked on the above listed holidays. Consult your department supervisor for how this is handled in your area.

### *Jury Duty / Subpoenaed Witness*

Hilltop supports employees in their civic responsibilities, such as appearing for jury duty, serving on a jury, and appearing in court in response to subpoenas.

Regular employees will receive their regular pay, up to three (3) consecutive days of jury duty.

Part time and temporary employees will receive regular wages for the days originally scheduled to work, or would have been scheduled to work, for the first three days of jury duty.

#### *What to do if you receive a Jury Summons:*

1. Inform your supervisor as soon as possible after receiving a summons for jury duty.
2. List your jury duty, or subpoenaed witness time for the first three days, as regular hours worked on your timecard.
3. Provide to Hilltop a copy of either the Juror Service Certificate as provided by the court, or the subpoena to appear as witness in court.

#### *Things to keep in mind:*

- Employees who may be party to an action, and require time off to appear in court as a party, or in the absence of a subpoena, must use PTO, or take leave without pay if PTO is exhausted.
- Employees subpoenaed as witness, so long as they are not party to the action, are authorized leave with pay to testify or appear in court.
- Hilltop has no obligation to pay wages for jury duty until and unless the employee tenders to Hilltop a juror service certificate as provided by the court.

### *Military Duty*

Hilltop abides by the Federal Uniformed Services Employment and Reemployment Rights Act (USERRA).

If you are a member of the U.S. Armed Forces Reserve or National Guard, you are granted an unpaid leave of absence when called for active or inactive duty training.

This time is granted in addition to earned vacation time. However, if you desire to use our vacation time for this purpose, you may voluntarily do so if you make a request in writing.

If you are inducted into a branch of the U.S. Armed Forces for an extended period, upon returning to Hilltop after separation from military service, you may be reinstated in accordance with the provisions of the Law.

### Domestic Violence Leave

Hilltop permits employees who are victims of domestic abuse, stalking, sexual assault, or any other domestic violence related crime, to take up to three days of leave to:

- Seek a restraining order;
- Obtain medical care or counseling;
- Locate safe housing or make their home secure;
- Obtain legal assistance and prepare for or attend court-related proceedings.

#### *Things to keep in mind:*

Eligible employees should provide advanced notice to their supervisor “except in cases of imminent danger to the health or safety of the employee.” Employees may be required to provide documentation.

Paid time off (PTO) will be used for the leave taken. If PTO is exhausted, leave without pay will be authorized. Additional time off may be approved by the appropriate Manager.

### Family and Medical Leave

In accordance with the Family and Medical Leave Act (FMLA), Hilltop grants leave to eligible employees.

To be eligible for Family and Medical Leave, an employee must be employed at least 12 months by Hilltop and have worked at least 1,250 hours during the 12 months before the commencement of leave.

Under Family and Medical Leave, **employees must use any earned PTO and EIB hours (if appropriate) at the beginning of the leave.** Family and Medical Leave is, otherwise, unpaid leave (unless employee is entitled to Worker’s Compensation benefits). As with other types of unpaid leave, PTO and EIB will not accrue during the unpaid leave.

Leave is granted for the following reasons:

- Employee’s own serious health condition;
- Pregnancy disability;
- Father’s attendance at birth of child;
- Parent’s care of newborn, following the birth of child, placement of a child with employee for adoption or foster care;
- Serious health condition of employee’s child under 18 years, or older if child is disabled;
- Serious health condition of employee’s relative (see definition of relative in section 4.4);

- For any qualifying exigency if the employee’s spouse, son, daughter, or parent is on active duty or has been notified of an impending call or order to active duty in the Armed Forces.

### How to request FMLA leave

Notify your department Supervisor as soon as possible. (Hilltop asks at least 30 days prior to the leave, if the leave may be planned for);

1. Complete and submit the Hilltop **FMLA Leave Request Form** to your supervisor or Human Resources. This form is posted in Ultipro – My Company/Electronic Forms/Benefits
2. The Form will request you state in writing:
  - a. The reason for the leave;
  - b. The starting date and planned date of return to work.
  - c. Agreement to provide certification of the need for leave for your own personal medical condition, or to care for an eligible family member.
  - d. An understanding of the need to pay for any medical insurance premiums while on Family Medical Leave.

### *Things to keep in mind:*

- Appropriate physician certification for any serious health condition may be requested.
- Hilltop may require a second medical opinion. If this is required, it will be obtained at Hilltop’s expense.
- If notification and appropriate certification are not provided in a timely manner, approval for leave may be denied.
- Continued absence after denial of leave may result in disciplinary action.
- Please make every effort to provide advance notice to your supervisor. In your absence, your supervisor must arrange for another employee to perform your work. This takes time and approval from management.
- If leave is granted, your supervisor may request that you report periodically on your medical status and intent to return to work.
- If an employee is currently covered by Hilltop’s medical insurance, these benefits continue for employees on FMLA leave. Employees must continue to pay their portion of any insurance premium while on leave.
  - The employee’s failure to pay their share of the premiums may result in loss of coverage.
  - Should an employee fail to pay their share, Hilltop may elect to pay the employee’s share as an advance against future wages in order to maintain coverage during the leave. In this event, Hilltop then has the right to deduct the amount advanced from the employee’s paycheck upon return to work.

## Returning to work after FMLA leave

Employees on leave must contact their department supervisor at least two days before their first day of return. Certification of “Fitness for Duty” may be required for an employee who is on leave for his or her own serious health condition.

Employees returning from Family and Medical Leave, except for certain highly compensated employees, will be returned to the same position, or an equivalent position subject to the requirements of FMLA.

### *Things to keep in mind*

- The maximum time allowed for Family and Medical leave is a total of 12 weeks in the 12-month period measured forward from the first day of an employee’s leave. The one exception is leave for an employee who is caring for an injured service-member. Those employees are entitled to up to 26 weeks of leave. A “week” is equal to the average weekly hours worked by the employee during the 12 weeks prior to the start of the leave. Although most leaves would be taken in a single block of time, intermittent leaves or reduced leave schedules also may be granted, where medically required, or in cases where both Hilltop and the employee agree.
- Employees taking intermittent leave or reduced schedules when the leave is foreseeable based on planned medical treatment or as an agreement after the birth or adoption of a child may be required to temporarily transfer to another job with equivalent pay and benefits that better accommodates that type of leave.

## Sabbatical Leave

Hilltop grants eligible employees up to four (4) weeks Sabbatical Leave.

During this leave, Hilltop will pay employee regular shift hours at the employee’s base rate for a current normal staffing schedule.

Employees in good standing are eligible for Sabbatical Leave on their 10 year anniversary, and 10 years after their last sabbatical leave.

### *How to request sabbatical leave*

90 days prior to leave, the employee shall provide to his or her supervisor a written request for Sabbatical Leave. The supervisor will then present the request to a Senior Manager for approval.

### *Things to keep in mind*

- Sabbatical Leave is not an accrued benefit.
- When calculating eligibility, all time with Hilltop is considered, including previous Hilltop employment. Employees who previously worked for Hilltop and returned after working elsewhere must work 5 additional years after their return before being eligible for a sabbatical leave.

- Length of sabbatical for General Employees is 4 weeks, taken consecutively, at time of eligibility.
- During the course of the leave, the employee must be completely removed from work as well as work related contacts.
- If the employee is currently covered by Hilltop's medical insurance, these benefits continue for the Sabbatical Leave. Employee must continue to pay their portion of any insurance premiums while on leave.
- PTO and EIB will continue to accrue during leave. A total PTO Cash Out of up to 80 hours will be allowed during the Sabbatical year, as long as 100 hours remain in the employee's PTO bank after Cash Out (Also see PTO).
- Sabbatical Leave and FMLA do not run concurrently. The employee, upon return from Sabbatical Leave, will return to the same position held when leave commenced.
- Any exceptions must be approved by the Chief Executive Officer.

## 4.12 Pregnancy and Child Birth Support

ID: 4.12	Human Resources
Effective Date: October 1, 2018	Last Revision: October 1, 2018

Employees of Hilltop shall not be subjected to discriminatory or unfair employment practices because of pregnancy, a health condition related to pregnancy, or the physical recovery from childbirth.

Employees who are otherwise qualified for a position may request a reasonable accommodation related to pregnancy, a health condition related to pregnancy or the physical recovery from childbirth.

Hilltop will make every effort to support employees who wish to continue breastfeeding when the employee returns to work. For up to two years after childbirth, Hilltop will provide nursing employees reasonable daily unpaid break time to express breast milk.

### *Recommended procedure*

1. An employee wishing to request a reasonable accommodation for pregnancy or breastfeeding should contact a Human Resources Representative or the Employee Health Nurse.

### *What to expect from Hilltop*

1. When an employee requests an accommodation, Hilltop will engage in a timely, good-faith, and interactive process with the employee to determine whether there is an effective, reasonable accommodation that will enable the employee to perform the essential functions of her position.
2. Hilltop may require employee provide a note from the employee's health care provider detailing the medical advisability of the reasonable accommodation.
3. A reasonable accommodation will be provided unless it imposes an undue hardship on the Hilltop's business operations.
4. Hilltop will not deny employment opportunities or retaliate against an employee because of a request for reasonable accommodation related to pregnancy, a health condition related to pregnancy, or the physical recovery from childbirth.
5. An employee will not be required to take leave or accept an accommodation that is unnecessary for the employee to perform the essential functions of the job.



## 4.13 Wage & Salary, Payroll processes

ID: 4.13	Human Resources
Effective Date: October 1, 2018	Last Revision: October 1, 2018

### Payroll period and general process

Hilltop's pay period is two consecutive workweeks. Pay is distributed on the Friday following the end of a pay period. If pay day falls on a day on which the Hilltop Human Resources Office is closed, pay shall be available earlier; on the last work day before the usual pay day.

By 9:00 a.m. Monday following the end of pay period, all non-exempt employees are required to properly fill in their time card with all required information including start and end times rounded to the nearest ¼ hour.

By 4:00 p.m. on the Monday following the end of pay period, authorizing supervisor will approve departmental time cards.

### Employer paid taxes

Employers are responsible for paying a portion of payroll taxes for each employee. The employer-portion of payroll taxes includes the following:

- Social Security taxes (6.2% up to the annual maximum)
- Medicare taxes (1.45% of wages)
- Federal unemployment Tax Act (FUTA)
- State Unemployment Tax Acts (SUTA)

### Required Payroll Deductions

Hilltop will deduct from an employee's gross pay all amounts required by government agencies. Hilltop relies upon the W-4 forms completed by employees at the time of hire or updated by the employee as their personal situation changes.

Required payroll deductions are deductions that are required by government agencies. These include:

#### *Federal Income Taxes*

All employees must have income taxes deducted from their wages based upon their current Withholding Allowance Certificate (W-4 form).

#### *Social Security Taxes*

The rate and maximum liability for Social Security withholding is set annually by the Social Security Administration.

#### *Medicare*

The rate for Medicare tax is set annually by the Social Security Administration.

### *State Income Taxes*

State income tax rates are set by each state.

### *Withholding responsibilities*

Employees are responsible for updating their W-4 form as their personal financial situation changes.

The payroll clerk is responsible for entering the employee's W-4 forms in the payroll software.

The Human Resources department is responsible for ensuring the payroll system withholding rates are current and calculate correctly in the payroll software.

### *Hours of Work*

Your required work hours may include overtime and may vary from week to week. Your supervisor will provide your schedule.

Hilltop's normal workweek is a seven day period starting at 12:01 a.m. Sunday morning and ending at 12:00 midnight Saturday evening. This period is significant for purposes of computing overtime hours for nonexempt employees.

Work hours are hours actually worked. This does not include Paid Time Off, which is also referred to as "PTO", Extended Illness Bank ("EIB"), Family and Medical leave or other leave periods, or holiday time not actually worked.

### *Time Records*

Your time card is the property of Hilltop and the legal record of the hours you work.

You and your supervisor must initial any changes on your time record.

Falsification of time cards or delayed submittal may result in disciplinary action, up to and including discharge.

### *Electronic time sheets*

Each employee is required to complete his/her own electronic time sheet in an accurate and timely manner.

Hourly employees will record the time they arrive at work and leave work in the method specified by the department or program to which he or she reports.

Exempt employees should maintain a schedule as specified by the department or program to which he or she reports.

### *Things to keep in mind*

- If you have trouble filling out your timesheet, please contact your department timesheet processor, Payroll, or your HR Business Partner

- Do not allow other employees to write or sign your time sheet.
- By submitting your time card, you are stating that the information contained is correct and accurate.
- Please report timesheet corrections to your time keeper as soon as possible.
- If you discover a discrepancy on your pay check, please bring it to your supervisor's attention.
- The timesheet processor may initial incomplete timecards.
- Enter PTO on the timecard. If you take time off from a normal schedule and you have PTO available, you must use PTO.
  - If you do not know your available balance of PTO, please refer to your most recent paystub, or go to Myself/Benefits/ PTO Plans, which are both accessible in Ultipro.
- If you were asked by your supervisor not to work due to a "low census" situation within the department or program: write "low census" in the Notes section of your timecard for that day. You may use PTO if you choose.
- The department timesheet processor must have timesheets corrected and approved not later than 4:00 p.m. on the Monday of the payroll week.

### Breaks, Lunch and Rest Periods

Each employee is expected to take a paid, 10-minute break for each full four (4) hours worked. An unpaid 30-minute break is required for a scheduled work period of 5 complete hours or more.

For employees working on 12 hour shift cycles, a 10 minute break is allowed for each full 4 hours worked. An unpaid 30 minute break is allowed twice a shift, following every 5 hours of work.

Due to the nature of the business conducted in direct care programs, the department directors may allow certain positions to have a paid 30-minute working meal.

Consult your department supervisor for how breaks are handled in your area.

### Lunch and breaks; unplanned absences

Hourly employees stopping work duty for lunch break or any other reason will 'clock out' and 'clock in' when returning to duty, using the method specified by the department or program to which he or she reports.

All employees leaving a work duty station will inform their supervisor before leaving an assigned work station.

Failure to respect the established process and properly record time and breaks may result in disciplinary action, up to and including termination.

## Overtime

Overtime shall not be worked without the prior approval of the Supervisor, a request of management, or if necessary to serve the best interest of Hilltop and our customers and clients.

Absent compelling reasons, employees are expected to work overtime when requested.

Overtime for non-exempt employees is defined as hours worked in excess of 40 hours per workweek or 12 hours in one day. Nonexempt employees shall receive premium pay (1.5 times their rate of pay) for all overtime hours worked.

A workweek is defined as a seven day period starting at 12:01 a.m., Sunday morning, and ending at 12:00 midnight Saturday evening.

### *How overtime is calculated*

When computing overtime, hours considered include all work hours, breaks and meal periods of less than 30 minutes, and attendance at scheduled Hilltop meetings.

Time not considered in computing overtime includes all leave time (such as: Paid Time Off, "PTO"; Extended Illness Bank, "EIB" and FMLA), holidays, unless actually worked, normal travel to and from work, and meal periods of 30 minutes or more.

## On-call

Non-exempt employees may be designated "on-call" to respond to after-hours situations.

Employees designated to be working on-call are to record the hours worked "on-call" on their electronic timesheet. For purposes of calculating the hours "on-call":

- Phone time is considered work time while on-call;
- On-call physical work time begins when the employee leaves their personal activity to respond to Hilltop situations.

On-call will be compensated as follows:

- All regular hours worked;
- Flat fee for carrying a pager, according to program designation;
- Any hours worked due to being called in;
- Any overtime resulting from the above.

## Payroll advance

At the sole discretion of Hilltop, and upon proof of emergency and immediate need, an employee may be granted an advance on pay once per calendar year.

A maximum of \$300, or the net of the check, (whichever is less), is allowed per advance. Repayment of the pay advance will be in full from the employee's next payroll check.

Hilltop may require proof from the employee as to the nature of the emergency or need for advance.

Generally, Hilltop management will consider emergency reasons for a pay advance, such as:

- Immediate medical need for the employee or their immediate family;
- Threat of eviction or loss of home;
- Vehicle repair, where the employee would otherwise not be able to get to work; or
- Other serious circumstance, as determined on a case by case basis by Hilltop supervisor and management.

*How to request an advance in pay*

1. Employee shall review the terms and become familiar with the obligations associated with a pay advance. The terms and obligations include:
  - a. One pay advance allowed per calendar year.
  - b. Re-payment of the pay advance will be in full from the employee's next payroll check.
  - c. A maximum of \$300, or the net of the check, (whichever is less), is allowed per advance.
  - d. Employee may be required to submit proof/documentation of the emergency.
2. Employee shall write a brief summary of the emergent nature of circumstances requiring the request for advance of pay and then present the written request to direct supervisor.
3. Supervisor will direct the request for pay advance to Department director.

## 4.14 Health & Safety

ID: 4.14	Human Resources
Effective Date: October 1, 2018	Last Revision: October 1, 2018

### Safety Expectations

It is Hilltop's goal to maintain a high standard of employee health and safety. Toward this end, Hilltop provides training, safeguards, and programs to promote safety and to prevent accidents and damage to property.

Each employee is responsible for abiding by all applicable safety rules and regulations. It is the employee's responsibility to locate, read, and understand all such rules and regulations, and to ask his/her supervisor any questions he/she may have.

We expect every employee to do his/her job in a manner that ensures his/her personal safety and that of fellow employees.

Safety is the responsibility of everyone.

In order to provide a safe workplace for everyone, every employee must follow our safety rules:

1. Horseplay, roughhousing, mud wrestling, and other physical acts that may endanger employees or cause accidents are prohibited.
2. Employees must follow their program/department's safety instructions.
3. Employees in certain positions may be required to wear protective equipment, such as hairnets, hard hats, safety glasses, work boots, earplugs, masks or any other safety protection required by supervisors or other applicable standards. Your supervisor will let you know if your position requires protective gear.
4. Employees in certain positions may be prohibited from wearing lanyards, dangling jewelry or loose apparel and may be required to pull back or cover their hair for safety purposes. Your supervisor will tell you if you fall into one of these categories.
5. All equipment and machinery must be used properly. This means all guards, restraints, and other safety devices must be used at all times. Do not use equipment for other than its intended purpose.
6. All employees must attend safety training as required by their supervisor.
7. Every safety precaution should be observed no matter how routine or urgent a job might become.
8. All employees must immediately report any workplace condition that they believe to be unsafe to their supervisor or Hilltop's Safety Officer. Hilltop will look into the matter promptly.

## Prohibited items

Hilltop prohibits the possession, transfer, sale or use of illegal drugs, firearms, explosives, pornography or other improper or illicit materials on its premises.

## Smoke Free Facility

There shall be no chewing or smoking of tobacco, marijuana or illicit material within any Hilltop building, including the use of e-cigarettes and vaping.

Tobacco use areas may be allowed in designated, outdoor areas, near or at certain Hilltop facilities.

Smoking marijuana or other illicit material is prohibited at any time on any Hilltop property.

Employees choosing to smoke shall do so only in these designated smoking areas and shall not infringe on the rights of clients and non-smokers.

Employees are responsible for awareness and compliance with Hilltop facility and supervisory guidelines concerning smoking.

Employees shall properly extinguish cigarettes and properly dispose of all waste.

See your supervisor for guidelines as to campus/program/locations that may have designated outdoor areas where tobacco smoking is permitted.

## Security Inspections

Hilltop prohibits the possession, transfer, sale or use of illegal drugs, firearms, explosives or other improper materials in Hilltop facilities, and requires the cooperation of all employees in administering this policy.

Hilltop reserves the right to perform security inspections at any time, with or without notice and at its sole discretion.

Desks, lockers, and other storage devices may be provided by Hilltop for the convenience of employees. At all times, these storage devices remain the sole property of Hilltop.

Accordingly, any agent or representative of Hilltop may search or inspect the storage devices, as well as any article found within, at any time, either with or without prior notice.

Further, Hilltop may, at its sole discretion, cause its representative to inspect persons entering and/or leaving the premises, and any packages or other belongings.

Any employee who wishes to avoid inspection of any articles or materials should avoid bringing items onto Hilltop's premises.

## Workers Compensation

Hilltop carries insurance to cover the cost of work-related injury or illness. These benefits help pay for your medical treatment and part of any income you may lose while recovering. Specific benefits are prescribed by law, depending on the circumstances of each case.

Within four (4) working days of the injury or accident, employees must provide written notice of injury (Employee Injury Report Form) to Hilltop, or benefits may be reduced or denied.

### What to do if you are injured on the job

1. Call 911 **if injury or illness is life-threatening.**
2. Call 911 **if ambulance transportation to the nearest hospital is needed.**
3. Tell the medical providers the injury is “Occupational Health” and advise the provider you are employed with Hilltop.
4. Notify your supervisor immediately.
5. Contact Hilltop’s Worker’s Compensation Coordinator to report the injury, as soon as it is possible to do so.
6. For non-emergency injury or illness:
  - a. Go to the Hilltop - designated medical provider.
  - b. If an injury occurs after clinic hours or on weekends, report directly to:
    - i. Community Hospital’s Emergency Room, Grand Junction;
    - ii. Montrose Memorial Hospital, Montrose.
  - c. Tell the medical providers the injury is “Occupational Health” and advise the provider you are employed with Hilltop.
7. Employee must be evaluated by Hilltop’s designated medical provider.
8. Within 4 days, fill out Employee Injury Report form. Return it to your supervisor, Hilltop employee health nurse or Human Resources.

If employee does not go to a designated medical provider, worker’s compensation benefits or medical expenses may be denied.

### Modified Duty

The designated medical provider may recommend an injured employee return to work on modified duty. In such event, Hilltop may require the employee to return to work performing duties within the medical restrictions even if such work is different from the employee’s regular job duties.

In Hilltop’s sole discretion, there may be situations where modified duty is not feasible. The employee, if eligible, may have up to 480 hours of job protected leave under the Family and Medical Leave Act, in which event, the employee may take such leave.

The employee may not be entitled to receive worker’s compensation temporary disability benefits if employee refuses modified duty.



## Health & Wellness Program

Hilltop values the health of all employees and believes that healthy employees are essential to the success of Hilltop. Hilltop offers employee access to Hilltop's Health & Wellness Program. This program provides free immunizations, incentive programs, health concern counseling and more through Hilltop's own staff nurse.

Hilltop may offer to all employees an on-site health assessment. This allows for employees to participate in blood draws, blood pressure and other related health status checks.

The services provided at the annual health assessment, and the health & wellness program is paid 100% by Hilltop for its employees.

### Required Vaccinations & Flu Shots

Employees may be required to receive vaccinations and flu shots.

Please discuss with your supervisor, or refer to your department or program processes. Direct any questions you may have to the Hilltop employee health nurse or Human Resources.

## Drug Testing

Hilltop is committed to providing a safe, efficient, and productive work environment for all employees.

Using or being under the influence of alcohol or drugs on the job may pose serious safety and health risks. To help ensure a safe and healthy working environment, job applicants and employees may be asked to provide body substance samples (such as urine and/or blood) to determine the illicit or illegal use of drugs and alcohol.

Questions should be directed to the Human Resources Department.

### *Things to keep in mind*

1. Employees who refuse to submit to "reasonable suspicion" requests to undergo a drug or alcohol test while on the job may be disciplined, up to and including termination.
2. If you are exhibiting behavior at work for which a reasonable suspicion may be made that you are under the influence of alcohol or drugs, your supervisor or other Hilltop management may:
  - Document the behaviors that caused reasonable suspicion.
  - Schedule an appointment at an appropriate medical facility, where you will be required to provide a urine specimen to be tested.
    - A certified tech at the medical facility will administer the test.
    - You will be expected to show picture identification.
  - You will be driven by your supervisor or other Hilltop management to and from the medical facility.
  - Your supervisor or other Hilltop management will accompany you into the medical facility and wait while you provide a specimen.

- You will be placed on administrative leave until the results are finalized.
- Results may be instant, or may be sent out for confirmation. Generally, results are returned within 72 hours.
- If results are positive:
  - You will be transported to your home by supervisor, management or other third party.
  - Disciplinary action will be taken, up to and including immediate termination.

### Employee Assistance Program

Hilltop provides an Employee Assistance Program (EAP) to all Hilltop employees. This EAP service provides confidential counseling and referral services to employees for assistance with such problems as drug and/or alcohol abuse or addiction.

It is the employee's responsibility to seek assistance from the EAP prior to reaching a point where his or her judgment, performance, or behavior has led to imminent disciplinary action.

Participation in the EAP after the disciplinary process has begun may not preclude disciplinary action, up to and including termination of employment.

Questions should be directed to the Human Resources Department.

## 4.15 Additional employment related information

ID: 4.15	Human Resources
Effective Date: October 1, 2018	Last Revision: October 1, 2018

### Employment of Relatives

Hilltop's Chief Executive Officer will evaluate and approve any case involving employment of relatives. Hilltop does not allow the employment of relatives when:

1. There is an actual conflict of interest.
2. Where one relative would exercise direct supervisory authority over another.
3. If a relative would have access to sensitive information regarding another that may be inappropriate.

All employees are required to inform the Human Resources representatives of any relatives working for the company and of any changes in relatedness of an employee.

### Prohibited behaviors or relationships with clients

Hilltop prohibits inappropriate relationships or behaviors between employees, current and recent clients, or the families of clients. Some examples include, but are not limited to:

- Business dealings on either a profit or nonprofit basis.
- Fraternization or other social situations after working hours or away from work.
- Compromising personal contact, such as engaging in a sexual relationship with a client or his /her family member, or unauthorized consumption of alcoholic beverages or illicit drugs.
- Violations of contraband statues, policies, procedures, or operational memorandums.
- Accepting gifts, discounts, favors, loans, or services from a client.

*Please refer to Hilltop Corporate Policy 1.5, Commitment to Clients.*

### Personnel Records

Your personnel file at Hilltop contains information regarding your employment. Information in this file may include your employment application, resume, commendations, and change of status records, corrective action warnings, performance reviews, salary history, emergency contacts, tax reporting and other information. This file is maintained at the Corporate Office of Hilltop.

Personnel files are the property of Hilltop. Information contained in a personnel file is confidential. You may, upon written request, review your personnel file at the Human Resources department.

Employees are obligated to provide information for this file, such as emergency contact, telephone numbers, address, tax status and family status that may impact your employee benefits. Please notify your supervisor or Human Resources immediately if there are changes in your personal data.

Hilltop may release the file, or parts thereof, at the discretion of Hilltop, or in response to an approved judicial subpoena. All outside inquiries for employee information, including requests by process servers, subpoenas, or other legal action requests must be directed to Human Resources or a company director before any information related to an employee is released.

## Training Requirements

Hilltop requires a variety of training for new employees. Hilltop programs and departments may have specific training programs and may require employees to participate in training not outlined here.

At minimum, Hilltop employees should anticipate participating in New Employee Training “NET” and will receive additional training as determined by the department or program to which the employee is assigned.

## Performance Appraisals

Generally, performance appraisals, or Quarterly Check-Ins, are given quarterly in a calendar year. Performance appraisals may or may not include pay increases.

## Promotions

Hilltop recruits and hires the most qualified individual for any particular job opening. At the same time, Hilltop promotes from within whenever practicable.

## Termination of Employment

Employment with Hilltop is “at will” and either Hilltop or the employee may terminate the employment relationship at any time, with or without cause, and with or without notice.

A no call, no show for an assigned shift extending beyond 24 hours, may be considered job abandonment and, as such, a reason for termination.

An employee who is unable to work an assigned shift due to illness or other reason is encouraged to contact their supervisor as soon as possible.

On or before the last day of work all Hilltop property, such as Hilltop- issued phone, credit card, name badge, electronic data, keys, and other items, shall be returned to supervisor.

## 4.16 Benefits

ID: 4.16	Human Resources
Effective Date: October 1, 2018	Last Revision: October 1, 2018

**Hilltop is committed to providing quality benefits to employees.**

Please refer to the most current Hilltop Benefit Listing, available from Human Resources. This is a helpful listing of the dozens of benefits provided to you by Hilltop. The list identifies the benefit, which employees are eligible, the co-pay if any, and a brief description of the benefit.

### Paid Time Off (“PTO”)

Hilltop provides a bank of Paid Time Off for employees to use for holidays, bereavement, vacation, sick, personal days and other time away from work.

Eligible employees are those classified as “regular full-time” and “regular part-time.” All employees are eligible to accrue or use PTO benefits.

Rehired employees will begin accrual at the new hire accrual rate and be eligible for the six month and one year PTO distributions.

PTO is an accrued benefit. This means that you earn PTO based on the number hours you worked in each pay period. The PTO accrual rate is based on your length of service with Hilltop.

As an added benefit, Hilltop gives you a lump sum distribution of PTO award on your 6 month anniversary and on your one year anniversary. Each award is equal to one week of the average number of annual hours worked per pay period.

PTO hours are accrued based on the regular hours paid in each pay period. PTO hours are not accrued on overtime hours, or leave without pay.

Here is an example:

	Accrual Rate	6-month Distribution	12-month Distribution
Date of Hire	0.0462 hours	One week of the average of annual hours worked per pay period.	One week of the average of annual hours worked per pay period.
1-3 Years of Service	0.0847 hours		
4 or more Years of Service	0.1038 hours		

You may accrue a maximum of 240 hours of unused PTO in your bank.

Once you reach 240 hours, the PTO accrual stops until you use some of your PTO time and your balance falls below 240 again. In other words, you need to use the time or lose your future accruals.

Your current PTO balance is shown on your paystub. You may also view your balance through your Ultipro account under Myself/Benefits/PTO Plans.

## Scheduling PTO

Consult with your supervisor for time you would like to take off work and use your PTO.

PTO must be used to cover any time missed from the employee's normal schedule (for example, due to vacation, illness or holiday).

Employees are responsible for making certain:

1. PTO request forms are complete and submitted to supervisor in accord with department process.
2. PTO taken does not exceed the hours employee has accumulated.

### *Things to keep in mind*

- A negative PTO balance is not allowed.
- When considering your request for PTO, your supervisor will give precedence to client care needs and business necessity.
- Approval of your PTO request remains at your supervisors' discretion and scheduling by department directors may vary.
- For non-exempt employees, PTO must be used on an hour by hour basis for time taken away from work.
- For exempt employees, PTO must be used in full day increments for absences of one or more full days.
- Not more than 80 hours PTO and/or EIB may be paid in any pay period.
- PTO must be exhausted before employees may apply for leave without pay.
- For the first week of an employee's own illness, PTO will be used. (A "week" is equal to the average weekly hours worked by that employee). After the employee has used one week's worth of PTO, or taken time without pay if no PTO is available, EIB may be used for an employee's own injury or illness. (See Extended Illness Bank (EIB)). After EIB is exhausted, PTO will be used.
- Employees not working due to low census and are not using PTO should use the LWOP-Low Census code when completing their time sheet.
- Upon resignation or termination, PTO accrued to the last day worked, and not used, will be paid to employee in a final check.
- There are special rules for holiday, negative PTO situations, and other things you should know about our PTO benefit. Be sure to discuss PTO with your supervisor or your Human Resources Business Partner.

### PTO for recognized holidays

For New Years, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day, the following procedure shall be followed:

All buildings or departments that routinely operate five (5) days per week or less will be closed for the observed holidays listed above, and the regularly scheduled employees will use regularly scheduled hours of PTO or available accrued PTO for the holiday.

All building or departments routinely working more than five (5) days per week will be adequately staffed during these observed holidays by the department director and requests for paid time off (PTO) will be approved at the direct supervisor's discretion. Employees should check with their supervisor to see how it is handled in their department.

It is the responsibility of the employee to ensure that PTO taken does not exceed the maximum accrued hours.

### Cash out

Hilltop allows, once in a fiscal year (Aug 1 to July 31), an employee to request a check for accrued PTO time without taking the time off.

A maximum of 40 hours of PTO may be cashed out annually, to include hours donated to the Making a Difference Fund or other donations.

Minimum PTO balance after cash out of PTO must be at least 100 hours.

Exceptions to maximum hours cashed out and/or PTO balance remaining after cash-out may be made with Senior Leadership approval.

During an employee's Sabbatical year a maximum of 80 hours may be cashed out (see Sabbatical Leave).

### Extended Illness Bank ("EIB")

Hilltop created the Extended Illness Bank (EIB) to provide a paid leave program for employees, in the event of employee's **own** extended illness, injury, surgery or hospitalization. EIB may also be used for maternity leave of the mother. New fathers may use up to 80 hours of EIB following the birth of their child during the initial 120 days following the birth or adoption.

Eligible employees may use earned EIB hours after absence of five (5) scheduled work days for any one event.

An event is considered a non-work related injury, illness, medical procedure, surgery or birth or adoption of a child that temporarily prevents the employee from performing the essential functions of his or her position.

### Accrual rate for EIB hours

EIB hours are accrued each pay period, based on the number of regular hours worked in each pay period.

Accrual rate for eligible employees is .02692 for each hour worked.

Example:

80 hours worked x .02692 = 2.16 EIB

This accrual rate remains the same throughout employment at Hilltop.

Maximum accrual is 560 hours of EIB.

#### *Transfer of EIB to PTO*

Employees with more than 500 hours may transfer EIB to PTO bank. Request the transfer in writing.

Two (2) EIB hours = one (1) PTO hour. A maximum of 48 hours EIB (24 PTO) may be transferred each year.

#### *How to apply for EIB benefit*

- To access EIB, make a request, preferably in writing, to your supervisor.
- If EIB will be used for two weeks or longer, explore with your supervisor eligibility for Family Medical Leave. If you are determined not eligible for Family Medical Leave:
  - 1. Please provide to a physician note to your Department director.
    - The physician note must be from a licensed medical doctor. The note shall include:
      - The length of time the employee will be away from work;
      - The start date of the leave (or the date of surgery) and the date employee is anticipated to return to work.
  - 2. Before returning to work, please obtain a physician note indicating you are “released” to work, and provide a copy to your Department director.

#### *Things to keep in mind*

- In all cases, a request for EIB must be made to your supervisor.
- If EIB benefits are needed for two weeks or more, a physician’s note is required.
- You must miss five (5) days/one scheduled week of work, due to illness or injury, before applying for EIB. This applies to each individual illness.
- PTO will be used the first 5 days of the illness or injury. If you have no PTO balance, one week of leave without pay must be used before you may access EIB.
- Pregnancy, or post-delivery convalescence for mothers is an approved EIB event. EIB pay for post-delivery convalescence may not exceed twelve weeks.
- Being out with an illness or injury for 5 days or more may result in Family Medical Leave exploration and initiation.

#### *EIB may be paid upon resignation*

An employee serving Hilltop continuously for ten (10) years or more may receive employee’s accrued hours of EIB, to be paid out at resignation or termination.

Employees with fewer than 10 years with Hilltop will not receive EIB compensation at termination.



Accumulated EIB will be compensated, based on length of service, in the following manner:

10 years+ but less than 15 years	25% of EIB accumulation
15 years + but less than 20 years	50% of EIB accumulation
20 years + but less than 25 years	75% of EIB accumulation
25 years + or more	100% of EIB accumulation

## Tuition Reimbursement

At Hilltop's sole discretion, Hilltop may reimburse employees for all or a portion of the cost of attending educational courses that will be of benefit to the employee, or to Hilltop, presently or in the future.

The maximum reimbursement per employee is \$375 per semester, and \$750 per fiscal year. This amount is regardless of school, program or number of classes or courses taken.

A limited pool of tuition dollars exists in each fiscal year. Requests will be taken on a first come basis and prioritized in order of the education needs of Hilltop. Hilltop management may allocate these dollars to specific certification/training areas. Determination concerning the terms, eligibility and granting of this benefit shall be final.

### *How to apply*

Fill out a Tuition Reimbursement form and submit it to your department director for pre-approval.

### *Keep in mind*

- The course must be of benefit to the employee or to Hilltop, presently or in the future.
- In all cases, the source providing the course must be accredited or recognized.
- The maximum reimbursement of \$375/per semester and \$750/per fiscal year may be granted regardless of school, program, or number of classes/courses taken.
- Hilltop may request proof of registration and/or course completion prior to reimbursement.
- Financial need – other grants, funding, or scholarships available will be taken into consideration before approval is given.
- The Department Director is responsible for reviewing the application for accuracy, completeness, and appropriateness under the guidelines. The department director may request from the employee: details concerning the course, financial need and proof of registration/ course completion.

## 4.17 Unacceptable Conduct & Corrective Actions

ID: 4.17	Human Resources
Effective Date: October 1, 2018	Last Revision: October 1, 2018

### Unacceptable Conduct

Although employment with Hilltop is at will, meaning that either the employee or Hilltop may terminate the employment relationship at any time, with or without cause, certain conduct is unacceptable and may result in discipline, suspension or immediate termination.

The list below is not all-inclusive. Other conduct not listed may also lead to discipline, suspension or termination.

Unacceptable conduct includes, but is not limited to:

- a. Violation of a law, Hilltop policy, or Hilltop departmental or program rule that results or could result in serious damage to Hilltop's property or interests or could endanger the life of the Employee, clients or others;
- b. Disloyalty to Hilltop that may be harmful to Hilltop's relationship with customers, clients or the public in general;
- c. Falsification of records or reports required by Hilltop, including the falsification of time records, or other acts of dishonesty;
- d. Theft;
- e. Insubordination;
- f. Assaulting or threatening to assault another person;
- g. Willful neglect or damage to Hilltop's property or interest;
- h. Incarceration after conviction of a violation of any law;
- i. Loss of driver's license, professional license, certification or other professional designation essential to job performance;
- j. Failure to participate in or to complete an approved program of corrective action to deal with an addiction to intoxicating beverages or controlled substances;
- k. Failure to properly safeguard, maintain, or account for Hilltop's property when this obligation is an essential part of the job;
- l. Behavior in the workplace that is or may be harmful to morale or work performance;
- m. The presence in the Employee's system, during working hours, of not medically prescribed controlled substances.
- n. Rudeness, insolence or offensive behavior toward a customer, client, supervisor or fellow employee;
- o. Taking unauthorized vacations or other leave;
- p. Excessive tardiness or absenteeism;
- q. Sleeping on the job;
- r. Failure to meet job performance standards;

- s. Failure to observe work rules;
- t. Refusal to perform any reasonable work request;
- u. Revealing confidential information obtained through employment to any person or to other employees who do not need to know in the performance of their duties or dealings on behalf of Hilltop or in pursuit of Hilltop's best interests;
- v. Violation of personnel policies, and/or violation of the policies of your department or program.

## Problem Resolution

Employees concerned about Hilltop policies, procedures or practices are encouraged to express their concern through discussion with the employee supervisor, program director, Senior Director or Human Resources.

No employee will be penalized, formally or informally, for voicing a complaint with Hilltop in a reasonable manner.

Hilltop has adopted Corporate Policy 1.8, Protected Disclosure and Whistleblower, intended to encourage and enable employees and others to raise serious concerns within Hilltop prior to seeking resolution outside of Hilltop. Refer to that Policy for more information.

## How do I report a problem?

1. Find a time to discuss the situation with your immediate supervisor.
2. If the problem has not been resolved, or if the problem involves the supervisor, the problem shall be described in writing and discussed with the program director or Human Resources.
3. If the problem remains unresolved after discussion, or if the problem involves the program director, the problem may be discussed with the appropriate Senior Manager or Human Resources.
4. The employee must state in writing the efforts made at each of the above steps to resolve the problem. The Senior Manager will appropriately explore the issue, and communicate their findings and/or decision to the appropriate parties.
5. If the employee is not satisfied with the Sr. Manager's decision or opinion, the employee may appeal to the Chief Executive Officer within ten (10) calendar days of the date of the decision. The appeal must be in writing. The Chief Executive Officer's decision on the appeal is final.

## Infractions of Policy or code of conduct

Violations of Hilltop policy shall be addressed as soon as possible with the employee.

Appropriate action will be taken according to the extent, or significance, of the violation. These actions may include:

- Verbal warning
- Written reprimand
- Final Warning
- Administrative Leave for investigation
- Suspension
- Termination.

## Administrative Leave

Hilltop Corporate Policy 1.19 states:

If an allegation has been made against an employee for improper conduct, the management, in its sole discretion, may determine to place an employee on Administrative Leave.

During the course of the Administrative Leave, the employee shall not be permitted to be on any Hilltop campus, or to have contact with any Hilltop employee or client. Exception may be made by his or her supervisor.

Administrative Leave may be used at the sole discretion of management, in connection with conducting an internal and/or external investigation of an allegation of improper conduct by an employee.

### *What employees should expect*

- If an allegation has been made against an employee for improper conduct, the management, in its sole discretion, may determine to place an employee on Administrative Leave.
1. The employee will receive notice from supervisor that Administrative Leave is warranted. [The Administrative Leave Notification form may be found electronically in Ultipro, or by contacting Human Resources.]
- Administrative Leave shall be unpaid leave during the course of an investigation.
  - During the course of the Administrative Leave, the employee shall not be permitted to be on any Hilltop campus, or to have contact with any Hilltop employee or client.
  - Administrative Leave may be used while conducting an internal and/or external investigation of an allegation of improper conduct by an employee, or while the results of drug or alcohol testing are pending.
  - Pay may be provided to the employee placed on administrative leave if the allegations are determined to be unfounded and the employee returns to work.

### *How the Administrative Leave process works*

2. *Determination.* The supervisor of the employee in question, in concert with Human Resources, shall determine if Administrative Leave is warranted.

Upon such determination, the supervisor must meet with the employee to complete the Administrative Leave Notification form, outlining the allegations being investigated, and the guidelines to be followed during the course of the investigation.

3. *Notification; Investigation.* The supervisor must immediately provide a copy of the Administrative Leave Notification form to Human Resources.

An investigation shall be conducted by the appropriate party or parties as soon as possible. Investigation, information and circumstances will be confined to appropriate Hilltop employees who will assist or need to know. Every effort will be made to maintain confidentiality at all times.

The outcome of the investigation will be shared with employee.

4. *During Leave.* The employee shall not visit any Hilltop campus, or have contact with any Hilltop employee or client.

Except to comply with law enforcement or with Hilltop's own investigation, the employee being investigated shall not discuss the situation while on Administrative leave.

5. *Outcome.* The outcome of the investigation will be shared with the employee. Hilltop will take appropriate action(s), including disciplinary action.