



PERSONNEL HANDBOOK
2020

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COVID-19 Pandemic Update: This handbook was produced prior to the COVID-19 pandemic. As with so many things, the pandemic will have an impact on some of the policies contained in this handbook. For example, the CARES Act has broadened paid sick time coverage under various circumstances, and the Star Island Corporation will eagerly comply with these provisions. This handbook does not include CARES Act and other relevant updates, but the intention of the Star Island Corporation is to fully comply with various COVID-19 related impacts on our policies and procedures. A future version of this handbook will be fully updated as it relates to COVID-19. In the meantime, if you have any specific questions about these policies as they pertain to COVID-19, please do not hesitate to reach out to HR.

We will have a small caretaking/security workforce on the island in 2020, when we expect to be closed to the general public. **There are very specific health and safety protocols that will be in effect throughout the season, and we expect 100% compliance with these protocols.** Prior to your first day of work on the island, you are required to have a video conference or phone meeting with our Island Nurse to discuss these protocols and make sure you have a chance to ask questions. Additionally, there will be a mandatory orientation session on your first day of work, as well as ongoing training. If you have any questions or concerns about our health and safety protocols, please do not hesitate to reach out to our Island Nurse.

INTRODUCTION

About the Handbook

Star Island Corporation's intent is to create an employment environment that is fair, humane, responsible, and consistent with Beloved Community. To that end, Star Island Corporation (SIC) has created this handbook, which contains policies and procedures that govern employment practices, outline legal obligations, and provide guidelines for personnel decisions at SIC. It is a practical guide for employees on workplace practices, benefits available to them as SIC employees, and other pertinent personnel information.

Every employee is required to review this employee handbook or any amendments hereto upon hire.

The policies of the handbook have been developed at the discretion of management and may be amended or cancelled at any time at SIC's sole discretion.

SIC encourages employees to regularly share their suggestions and comments through their supervisors or directly to SIC's Human Resources Department.

These policies supersede all existing policies and practices and may not be amended or added to without the express written approval of the Chief Executive Officer of SIC.

About Star Island

Star Island is a membership corporation whose more than 400 members meet annually. It is governed by a thirteen-member board of directors and has several standing committees.

Our mission is to hold and administer Star Island and other properties we own for religious, educational, and kindred purposes consistent with the principles of the Unitarian Universalist Association and the United Church of Christ. Our vision is to create on Star Island an environment that frees all who come to renew spiritually, explore matters of consequence, and gain knowledge about the world as it might ideally be.

Culture of Employment at Star Island

Star Island is a unique place. Working for SIC brings with it benefits beyond the typical wage and benefit package, though SIC does strive to offer competitive compensation. SIC is a place of natural and rugged beauty, and each employee is able to share in the experience of Star Island's location, environment, and community.

At work, SIC promotes a culture that stimulates openness, interpersonal communication, professionalism, and a high appreciation for process. Employees are recognized for their hard work and the skills they bring to the job.

The seasonal nature of Star Island's business means employment at SIC is transitional for many of its employees. SIC strives to counter this transitional nature by cultivating an environment that is welcoming to all employees regardless of the length of their employment. Part of that is involving year-round as well as seasonal staff in short and long range planning for the organization.

EMPLOYMENT

Employment at Will

Star Island does not offer guaranteed employment. Either SIC or the employee can terminate the employment relationship at any time, with or without cause, with or without notice so long as there is no violation of applicable federal or NH state law.

This at-will employment relationship exists regardless of any other written statements or policies contained within this Employee Handbook or any other SIC documents, or any verbal statement to the contrary.

Equal Employment Opportunity

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at SIC will be based on merit, qualifications, and abilities. SIC does not discriminate in employment opportunities or practices on the basis of age, sex, race, creed, color, marital status, familial status, sexual orientation, gender identity, physical or mental disability, genetic information or national origin, or any other characteristic protected by law.

This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training.

Any employees with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of the Chief Executive Officer (see *Grievance Procedure* under **Communications** for details). Anyone found to be engaging in any type of unlawful discrimination will be subject to disciplinary action, up to and including termination of employment.

Americans with Disabilities Act

SIC is committed to complying with Americans with Disabilities Act (ADA) and ensuring equal opportunity in employment for qualified persons with disabilities. SIC endeavors to conduct all employment practices and activities on a non-discriminatory basis. Hiring procedures have been reviewed and established to provide persons with disabilities meaningful employment opportunities. Pre-employment inquiries are made only regarding an applicant's ability to perform the duties of the position. All employment decisions are based on the merits of the situation in accordance with defined criteria, not the disability of the individual.

Reasonable accommodation is available to all employees with disabilities, where their disability affects the performance of job functions. Qualified individuals with disabilities are entitled to equal pay and other forms of compensation (or changes in compensation) as well as in job assignments, classifications, organizational structures, position descriptions, lines of progression, and seniority lists.

SIC is also committed to not discriminating against any qualified employees or applicants because they are related to or associated with a person with a disability. SIC follows applicable or pertinent New Hampshire state or local law that provides individuals with disabilities greater protection than the ADA.

This policy is neither exhaustive nor exclusive. SIC is committed as fully as practicable to taking all other actions necessary to ensure equal employment opportunity for persons with disabilities in accordance with the ADA and all other applicable federal, state, and local laws.

Anti-Discrimination Policy

SIC does not discriminate in policy or in practice against any of its employees because of age, sex, sexual orientation, gender identity, race, creed, color, marital status, familial status, physical or mental disability, genetic information or national origin.

SIC policies comply with federal and NH state anti-discrimination laws including Title VII of the Civil Rights Act, the Age Discrimination in Employment Act, the Americans With Disabilities Act, the Equal Pay Act, and New Hampshire's RSA 354-A.

Immigration Law Compliance

SIC is committed to employing only individuals who are authorized to work in the United States and does not unlawfully discriminate on the basis of citizenship or national origin. In compliance with the Immigration Reform and Control Act of 1986, each new employee, as a condition of employment, must complete the Employment Eligibility Verification Form I-9 and present documentation establishing identity and employment eligibility. Former employees who are rehired must also complete the form if they have not completed an I-9 with SIC within the past year, or if their previous I-9 is no longer retained or valid.

Employment Categories

Employment classifications are provided so that employees understand their employment status and benefit eligibility. The following classifications do not guarantee employment for any specified period of time. Accordingly, the right to terminate the employment relationship at will at any time is retained by both the employee and SIC.

Each employee is designated as either NONEXEMPT or EXEMPT from federal and state wage and hour laws.

1. NONEXEMPT employees are typically entitled to overtime pay under the specific provisions of federal and state laws. However, non-exempt employees of seasonal businesses, such as SIC, are not eligible. Hence, SIC does not pay overtime to its employees, though employees are paid at their regular hourly wage for all hours worked, including those over 40. Non-exempt positions typically include Pelican positions, both supervisory and non-supervisory, or technical/specialized positions that are non-management (*e.g.*, Island Clerk). Non-exempt employees are paid on an hourly basis.
2. EXEMPT employees are excluded from specific provisions of federal and state wage and hour laws. Exempt positions typically include program or department heads or technical/specialized positions that are management (*e.g.*, Environmental Services Manager). Exempt employees are paid on a salary basis.

In addition to the above categories, each employee will belong to one other employment category:

1. FULL-TIME/YEAR-ROUND employees are those who are not in a temporary, part-time, part-time/year-round position or probationary status, and who are regularly scheduled to work SIC's full-time schedule, which is a minimum of 40 hours per week. Generally, they are eligible for SIC's full benefit package, subject to the terms, conditions, and limitations of each benefit program.
2. PART-TIME/NON-SEASONAL employees are those who are not assigned to a temporary or probationary status and who are regularly scheduled to work less than 40 hours per week. Part-time employees will receive all legally mandated benefits (such as Social Security and workers' compensation insurance). They also may be eligible for some SIC benefit programs on a pro-rated basis based on the number of hours worked. (See the **Employee Benefits** section for details regarding the prorating of benefits).
3. SENIOR SEASONAL (FULL-TIME and PART-TIME) employees are typically hired to support the organization's conference season. Employment assignments in this category are mostly of a limited duration and typically extend from 3 months to 6 months. Employment beyond any initially stated period does not in any way imply a change in employment status. Seasonal staff retain this status unless notified to the contrary by SIC management. Seasonal staff will receive all legally mandated benefits (such as workers' compensation insurance and Social Security); they may also be eligible for other SIC benefits programs (see the **Employee Benefits** section for details regarding benefit eligibility for seasonal staff).
4. PELICAN (FULL-TIME and PART-TIME) employees are typically hired to support the organization's conference season. Employment assignments in this category can be as short as a week or as long as 8 months. Employment beyond any initially stated period does not in any way imply a change in employment status. Pelican employees retain that status unless notified by SIC management of a change. Pelican employees will receive all legally mandated benefits (such as workers' compensation insurance and Social Security); they may also be eligible for other SIC benefits programs (see the **Employee Benefits** section for details regarding benefit eligibility for Pelican employees - refer to *Sick*, *Crime Victim* and *Bereavement* leave sections).

Employment of Relatives

The employment of relatives in the same area of an organization may cause serious conflicts and problems with favoritism and employee morale. In addition to claims of partiality in treatment at work, personal conflicts from outside the work environment can be carried into day-to-day working relationships.

Notwithstanding the above, Star Island is, by its very nature, a place where two or more members of a family may be employed at the same time. While the intent of this policy is to ensure fair treatment of all employees, the policy is not intended to discourage the hiring of relatives. Employed relatives, however, may not be in a direct supervisory relationship. To ensure objective oversight and adherence to the intent of this policy, the Chief Executive Officer shall be informed of such personnel decisions at least one week prior to the hiring of a relative of an existing employee. If, in the opinion of the Chief Executive Officer, the proposed employment or assignment contradicts the intent of this policy, the CEO can mandate an alternative reporting relationship and/or prevent the hire if an alternative reporting relationship is not feasible. If the applicant is related to the Chief Executive Officer, the same process will be followed with the Board President acting in place of the CEO.

For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

COMPENSATION

Wages

SIC provides employees with compensation packages comprising wages and benefits based on employment status. Wages are determined based on the relative difficulty and responsibility of the position, prevailing wages for similar positions within relevant and comparable employment markets and other economic considerations, such as the financial resources of SIC.

Paycheck Distribution

All employees are paid bi-weekly on Friday. Each paycheck will include earnings for all work performed through the end of the previous payroll period, which ends the preceding Friday at 11:59PM.

In the event that a regularly scheduled payday falls on a day off such as a holiday, employees will receive pay on the last day of work before the regularly scheduled payday.

Direct deposit of an employee's paycheck is available and can be activated with written authorization from the employee. An employee who elects to use direct deposit will receive an itemized statement of wages rather than a paycheck.

Pay Advances

SIC does not provide pay advances on unearned wages to employees except in the following conditions. Seasonal staff who are living on Star Island may receive a pay advance during their first week of employment only. Such an advance will be accompanied by a written loan agreement and is to be paid back to SIC within two weeks of the date of issue. The loan may be repaid by payroll deduction at the employee's discretion.

Pay Deductions

The law requires that SIC make certain deductions from every employee's compensation. Among these are applicable federal, state, and local income taxes. SIC also must deduct Social Security taxes on each employee's earnings up to a specified limit that is called the Social Security "wage base." SIC matches the amount of Social Security taxes paid by each employee. Employees may elect to have additional benefit deductions taken from their paychecks, if applicable. Each voluntary deduction requires a signed authorization form from the employee. For details of these benefit deductions, see the Human Resources Department.

Per New Hampshire state law, SIC cannot make deductions from employees' paychecks for items purchased via credit at its retail operations.

If you have questions concerning why deductions were made from your paycheck or how they were calculated, see the Finance Department.

Administrative Pay Corrections

SIC takes all reasonable steps to ensure that employees receive the correct amount of pay in each paycheck and that employees are paid promptly on the scheduled payday. In the unlikely event that there is an error in the amount of pay, the employee should promptly bring the discrepancy to the attention of the Finance Department so that corrections can be made as quickly as possible.

ON THE JOB

Work Schedule

The workweek for SIC starts on Saturday at 12:00 a.m. and ends on Friday at 11:59 p.m. An employee working at 12:00 a.m. on a Saturday is in that employee's first hour of work for that week and the last hour if working on Friday at 11:59 p.m.

The required work schedules for employees vary throughout the organization. Supervisors will advise employees of their individual work schedules. Staffing needs and operational demands may necessitate variations in starting and ending times, as well as variations in the total hours that may be scheduled each day and week.

Employees under the age of 18 shall not work more than 6 consecutive days or 48 hours in any one week during which there is no school. Supervisors will be informed by SIC if an employee under the age of 18 is under their supervision and will be responsible for ensuring this policy is adhered to.

Time Sheets

SIC utilizes a web-based timekeeping system to accurately record time worked by each of its employees; most nonexempt employees are required to utilize this system. It is the employee's responsibility to accurately record time worked.

Federal and state laws require SIC keep an accurate record of time worked in order to calculate employee pay and benefits. Time worked is all the time actually spent on the job performing assigned duties.

- ❖ Nonexempt employees must accurately record the time work begins and ends, as well as the beginning and ending time of each meal or break period that is 20 minutes or greater. Employees should also record the beginning and ending time of any split shift or departure from work for other reasons.

- ❖ If a non-exempt employee utilizes leave time, such as sick leave or bereavement leave, a “day off” slip should be completed and then submitted to the Island Administrator. The type of leave should be indicated, *e.g.*, sick. See the **Employee Benefits** section for the rules regarding usage of leave time.
- ❖ Exempt employees should accurately record the number of hours they take off as paid time off. The type of leave should be indicated, *e.g.*, vacation, sick, personal.

Supervisors must review the time records of the employees they supervise to verify their accuracy.

Altering, falsifying, tampering with time records, or recording time on another employee's time record may result in disciplinary action, up to and including termination of employment.

Timesheets and leave requests of non-exempt employees who work on island (with a few exceptions) are submitted for payroll processing via the Island Clerk. Other employees are required to submit their time sheets directly to the Finance Department via email.

Attendance and Punctuality

To maintain a safe and productive work environment, SIC expects employees to be reliable and to be punctual in reporting for scheduled work. Absenteeism and tardiness place a burden on other employees and on SIC. In the rare instances when employees cannot avoid being late to work or are unable to work as scheduled, they should notify their supervisors as soon as possible in advance of the anticipated tardiness or absence.

Poor attendance and excessive tardiness are disruptive. Either may lead to disciplinary action, up to and including termination of employment.

Meal and Rest Periods

Meal Periods

According to NH state law, every *non-exempt* employee is entitled to a thirty-minute meal break for every five hours worked. It is SIC policy to allow each non-exempt employee up to a one-hour meal break if the position allows. This break period is uncompensated and must be taken unless the following conditions exist:

1. The employee voluntarily forfeits the lunch break; supervisor approval and acknowledgment in writing is required.
2. The employee is able to eat while working, in which case the employee will be compensated for the time.

The duration of an employee’s lunch break will not be less than 30 minutes and is generally determined based on the requirements of the job. Some jobs will require a shorter meal break than others and some may require employees to eat while working. The lunch break determined for the employee’s position will be communicated to the employee by the relevant supervisor at the start of employment.

In scheduling lunch breaks, supervisors must accommodate the operating requirements of SIC but will attempt to schedule them in the middle of a shift whenever possible. Employees will be relieved of all active duties and restrictions during meal periods and are free to leave the workplace to the extent it is possible.

If an employee is called to duty during a lunch break and as a result the lunch break falls below 30 minutes, the employee will be compensated for the time.

All uncompensated lunch breaks must be recorded on an employee's timesheet.

Rest Periods

State law does not require SIC to offer any breaks beyond a 30-minute meal break for every five hours worked. However, it is SIC policy to offer a 15-minute rest break to Pelican staff who work at its island location. 15-minute rest breaks are compensated time and do not need to be recorded on an employee's timesheet. Due to the nature of the work for some Pelican positions, 15-minute rest breaks are not possible; for such positions, the employee will be notified upon hire if the position is eligible for a daily rest break.

If in an unusual circumstance a supervisor grants a 20+ minute rest break to an employee, it must be recorded on the employee's timesheet and treated as uncompensated time.

At the discretion of the relevant supervisor, a rest break can be skipped to accommodate SIC's operating requirements.

Exempt Employees and Breaks

Generally, exempt employees are covered by the provisions of this policy in the sense that SIC assumes exempt employees will take lunch breaks or periodic rest breaks during the work day. SIC does not officially offer this option to exempt employees; rather, it is understood that exempt employees have the flexibility to exercise judgment both in how and when their work is done. The nature of an exempt employee's responsibilities may require irregular hours and work time beyond the typical eight hour day, so a greater emphasis is placed on meeting the responsibilities of the position rather than on working a specific number of hours or realizing a certain number of breaks.

Overtime

Overtime is a term used to describe hours worked over forty in a single week for non-exempt employees. SIC, based on its status as a seasonal business, is not required by law to pay overtime. All non-exempt employees will be paid for their hours worked.

Flextime

Flextime is the practice of adjusting an employee's weekly schedule to accommodate either the employer or employee's needs; such an adjustment is typically temporary. All SIC employees are eligible for flex time in certain circumstances, with the permission of the relevant supervisor and the CEO.

Flextime is available in some cases to allow employees to vary starting and ending times on a particular day or to vary their work schedule to accommodate personal needs, such as childcare responsibilities. Flextime, within employer defined limits, may be possible if a mutually workable schedule can be negotiated with the supervisor involved. However, such issues as staffing needs, the employee's performance, and the nature of the job will be considered before approval of flextime. Employees should consult their supervisors to request the use of flextime and all staff are expected to have regular presence in the office or another agreed-upon worksite, even if a provisional flextime schedule is approved.

In some instances, SIC may institute a use of flextime, such as curtailing an employee's work week so that the employee does not exceed a maximum number of hours worked or to relieve an employee who due to unforeseen circumstances worked an excessively long day and might benefit from an extended rest period.

Telecommuting

Telecommuting is the practice of working at home or at a site near the home instead of physically traveling to a central workplace. It is a work alternative that SIC may offer to some employees when it would benefit both the organization and the employee.

Employees who believe telecommuting can enhance their ability to get the job done should submit written requests to their supervisors proposing how telecommuting will benefit SIC and themselves. The request should explain how the employee will be accountable and responsible, what equipment is necessary, and how communication barriers will be overcome. Telecommuting is generally approved on an exception basis as regular on-site office time is important to staff coordination.

The decision to approve a telecommuting arrangement will be based on factors such as position and job duties, performance history, related work skills, and the impact on the organization.

The employee's compensation, benefits, work status, work responsibilities, and the amount of time the employee is expected to work per day or per pay period will not change due to participation in a telecommuting program (unless otherwise agreed upon in writing).

The employee's at-home work hours will conform to a schedule agreed upon by the employee and the relevant supervisor. If such a schedule has not been agreed upon, the employee's work hours will be assumed to be the same as they were before the employee began telecommuting. Changes to this schedule must be reviewed and approved in advance by the employee's supervisor, and on a regular basis, at least annually.

During working hours, the employee's at-home work space will be considered an extension of SIC's work space. Therefore, workers' compensation benefits may be available for job-related accidents that occur in the employee's at-home work space during working hours. All job-related accidents will be investigated immediately.

SIC assumes no responsibility for injuries occurring in the employee's at-home work space outside the agreed-upon work hours. The employee agrees to maintain safe conditions in the at-home work space and to practice the same safety habits as those followed on SIC's premises.

In the case of an injury while working at home, the employee will immediately report the injury to the relevant supervisor to get instructions for obtaining medical treatment.

Telecommuting is an alternative method of meeting the needs of the organization and is not a universal employee benefit. As such, SIC has the right to refuse to make telecommuting available to an employee and to terminate a telecommuting arrangement at any time. All requests for a temporary or part time telecommuting arrangement must be approved by the employee's supervisor and the Human Resources Department and include regular weekly onsite office time.

Transportation Disruptions

Because of the remote location of Star Island and the unexpected nature of marine transport, it may happen that an employee is unable to be transported to work. Non-exempt employees who cannot be transported to the island in such a situation will not be compensated; however, they are not required to make up the missed work. In most instances, employees will be notified of transport issues by their supervisors. However, employees should also be proactive and communicate with the island if they become aware of any external indications that might impact transport (*e.g.*, storms).

If an employee who lives on the island is working on the mainland when a transportation disruption occurs, alternative lodging and meal arrangements will be provided, under the following circumstances:

- ❖ The employee is scheduled to return to the island for work that same day or the day immediately following; and
- ❖ The employee does not have a reasonably accessible mainland residence; or
- ❖ There is a lack of available transport to the employee's mainland residence or the employee is required to return to the island at the soonest possible opportunity, requiring that the employee lodge in the immediate vicinity.

Alternative arrangements will be provided for up to 3 days maximum at which point the employee may be required to find alternative lodging and/or to return to the employee's primary residence. Alternative arrangements may include lodging with a Star Island employee or volunteer who lives in the Portsmouth area, or overnight accommodations at a local hotel or motel and a \$30 meal per diem for each full day of layover. A partial meal per diem will be provided for less than a full day of layover as follows: \$5 for breakfast, \$10 for lunch and \$15 for dinner. A one-time \$10 stipend will be provided to supply the employee with incidentals required for an overnight stay (i.e. toothbrush, toothpaste, deodorant, etc.).

During the conference season, Star Island's Front Desk may maintain a list of mainland employees and volunteers with available lodging as well as a list of acceptable commercial lodging facilities. The employee should make lodging arrangements through the SIC Front Desk, if lodging is needed. During open up and close up of Star Island, SIC's Portsmouth office will serve as the primary resource for lodging arrangements for a transportation disruption.

The employee should check in with the relevant supervisor, at least daily, to confirm continued lodging and/or transport arrangements.

Employees who have left the island for an overnight day off do not qualify for a transportation disruption per diem. However, an employee on an overnight day off may utilize the employee/volunteer lodging network, if needed, by calling the Front Desk or SIC Office Manager in Portsmouth.

Emergency Closings

At times, emergencies such as severe weather, fires, power failures, or earthquakes can disrupt SIC operations. In extreme cases, these circumstances may require the closing of a work facility.

Compensation during emergency closings that **last three days or less** is determined as follows:

For non-exempt and exempt employees, loss of time due to office or facility closure called by SIC management does not have to be made up.

Non-exempt employees who opt not to come to work due to weather or other conditions when the office is open can take annual leave, floating holiday, deduction from pay, or make arrangements to make up the time as determined by the relevant supervisor. Work days/hours missed must be made up within two weeks.

SIC is not required to compensate non-exempt employees if it determines its operations must close. However, SIC will review such instances on a case-by-case basis and assess the feasibility and reasonableness of compensating non-exempt employees during a disruption in business operations.

Exempt employees who opt not to come to work due to weather or other conditions when the office is open can work remotely, or take annual leave, floating holiday, or make arrangements to make up the time as determined by the relevant supervisor. Exempt employees will be paid their weekly salary if SIC is forced to close its operations.

Compensation and work make-up procedures during emergency closings that last three days or longer will be determined per occurrence.

Use of SIC Property

Use of Equipment

Employees use various types of equipment in the performance of their jobs at SIC. Equipment includes but is not limited to such items as: computers, cell phones, power tools, automobiles, golf carts, handheld radios, and appliances. Equipment is often expensive and may be difficult to replace. When using SIC equipment, employees are expected to exercise care, perform required maintenance, and follow all operating instructions, safety standards, and guidelines.

An important first step for all employees is to familiarize themselves with the proper use of and care of any piece of equipment prior to its use. Some equipment cannot be used without prior training or clearance from the employee's supervisor. Employees will be informed of the protocols for the usage of specific equipment.

Please notify your supervisor if any equipment, machines, or tools appear to be damaged, defective, or in need of repair. Prompt reporting of damages, defects, and the need for repairs could prevent deterioration of equipment and possible injury to employees or others. Your supervisor can answer any questions about an employee's responsibility for maintenance and care of equipment used on the job.

It is SIC policy to provide employees with the equipment needed to do their jobs. If an employee's negligence results in damage or loss of a piece of equipment, SIC may not provide the employee with a replacement; if the equipment is necessary for the job, the employee will be required to replace it personally.

The improper, careless, negligent, destructive, or unsafe use or operation of equipment can result in disciplinary action, up to and including termination of employment.

Golf Cart ("Vic's Vehicle") Use

SIC provides a golf cart for the use of the following crews under the following circumstances:

Bell Hop & Conference Services Crew

- ❖ When a conferee or island visitor with physical disabilities needs to be transported between or to the pier, the front porch (Cottage A side), the First Aid Station and the stone village.
- ❖ In the case of a medical emergency.

Night Crew

- ❖ In the case of a medical emergency.

Unless there is an emergency, the cart may only travel on the road between the areas listed above and to where it is parked under the front porch.

No other member of the Star Island staff is authorized to operate Vic's Vehicle and under no circumstances should an employee under 18 years of age or an employee who does not have a driver's license drive the golf cart.

Use of Telephones, Cellular Phones, and Other Communication Devices

SIC provides employees with access to telephones in the Portsmouth office. Employees may use SIC telephones for personal reasons but for a limited duration. Employees are expected to exercise discretion in the use of all SIC phones. For personal calls that are expected to exceed a reasonable duration, employees should use a personal credit/calling card or their personal cell phone.

SIC also provides some employees with cell phones to enhance their ability to perform their jobs. SIC is charged by the minute for cell phone use. Employees should not use cell phones for personal calls, however, limited use for family/personal communications related to work is acceptable. Use of any cell phones, either for personal or business use, is discouraged in common areas such as the lobby, dining room, and front porch.

Star Island is committed to protecting employees and others from the hazards that can be caused by inappropriate use of a cellular telephone or other communication device for telephone calls, text messaging, reading/sending email and/or accessing the Internet (collectively referred to as "Communication Devices").

Accordingly, employees who use Communication Devices while traveling outside of Star Island offices are required to adhere to the following guidelines:

- ❖ No employee shall use a Communication Device while operating a personal vehicle and engaged in Star Island business. Employees who use Communication Devices while in any motor vehicle during work hours or while they are engaged in Star Island-related business are expected to pull over to the side of the road and/or exercise appropriate caution before making or receiving calls, text messaging, reading/sending email, or accessing the Internet.
- ❖ Employees must adhere to all federal, state, and local laws, regulations and ordinances governing the use of cellular telephones and all other Communication Devices while driving.
- ❖ Employees who are charged with traffic violations or any criminal action resulting from the use of a Communication Device will be solely responsible for all liabilities that result from such use. Employees are always expected to exercise discretion and care while utilizing any Communication Device, and to avoid placing themselves or others at risk.

Company cell phones and reimbursement for personal cell phone use

Star Island will purchase and pay all charges for a limited number of company cell phones, and these numbers will be owned by Star Island. Any employee with dedicated use of these phones will be expected to return the phone if they leave Star Island employment unless another arrangement is approved by the CEO. Any employee who is required to use his/her personal cell phone for Star Island business and can demonstrate that Star Island business

constitutes at least 50% of their service need will be reimbursed \$20.00 for each month they routinely use their personal cell. "Required to use" is defined as an expectation that they routinely share their personal cell phone number so that other employees can reach them routinely during the work day on their personal phone. Reimbursement will be made on a quarterly basis (\$20.00/month), and invoices showing the monthly service fee for the cell phone plan must be submitted with the request for reimbursement. Employees will be reimbursed for any and all months they are routinely using their phones for Star Island business at the rate outlined above. Employees are responsible for all repairs and maintenance for personal cell phones, including loss of device.

If there are any questions regarding this policy, please contact the Human Resources Department.

Computer Use

Computers, computer files, the e-mail system, and software furnished to employees are SIC property intended for business use. Employees should only use their computers in the course of doing business on behalf of SIC; however, limited use for personal computer needs is acceptable. SIC has the right to inspect employees' computer files, emails and internet usage at any time and employees should have no expectation of privacy in any materials accessed through SIC's electronic systems.

SIC strives to maintain a workplace free of harassment and sensitive to the diversity of its employees. Therefore, SIC prohibits the use of computers and the e-mail system in ways that are disruptive, offensive to others, or harmful to morale. For example, the display or transmission of sexually explicit images, messages, and cartoons is not allowed. Other such misuse includes, but is not limited to, ethnic slurs, racial comments, off-color jokes, or anything that may be construed as harassment or showing disrespect for others.

Any use of the computer for either personal or business use must be legal. Employees may only use SIC computers in accordance with applicable federal and state law and SIC policy, including but not limited to a prohibition on the purchase of illegal materials and the accessing of child pornography. Employees are strictly prohibited from disseminating confidential information regarding SIC or its clients via electronic communication.

Employees may only use software on local area networks or on multiple machines according to the relevant software license agreement. SIC prohibits the illegal duplication of software and its related documentation. SIC also prohibits employees from downloading files from the internet or installing software programs for personal use or that have not been approved for business use by SIC. SIC reserves the right to act upon any information posted in a public domain that violates confidentiality or that presents concerns to SIC management.

Employees should notify their immediate supervisors upon learning of violations of this policy. Employees who violate this policy will be subject to disciplinary action, up to and including termination of employment.

Handheld Radio (Job com) Use

Handheld radios are a necessary method of communication between staff while working on island. Handheld radios are not an entitlement. Not every job requires the use of a handheld radio, and the IT Manager, in consultation with other senior island staff and crew supervisors, determines which employees are issued radios.

If it is deemed appropriate that an employee have a radio to perform a particular job, usage should be restricted to job-related purposes and follow the provided usage protocols. Certain channels on the handheld radio are restricted in use and as such need to be kept clear. Only emergency personnel may use the handheld radios during an emergency situation.

Employees should be aware that handheld radios are an open communication system and that the other party to a conversation is often not the only person able to hear the communication. Use discretion, brevity, and courtesy in all radio communications.

Each employee provided a handheld radio must be familiar with Star Island's Handheld Radio Usage policy.

Postage Use

The use of SIC-paid postage for personal correspondence is not permitted.

OTHER WORKPLACE POLICIES

Access to Personnel Files

SIC maintains a personnel file on each employee. The personnel file includes such information as the employee's job application, resume, records of training, documentation of performance appraisals and salary increases, pertinent correspondence, and any other federal and state employment records.

Personnel files are the property of SIC, and access to the information they contain is restricted. Generally, only supervisors and management personnel of SIC who have a legitimate reason to review information in a file are allowed to do so. All personnel files are kept in a locked file cabinet.

Employees who wish to review their own files should contact the relevant supervisor. With reasonable advance notice, employees may review their own personnel files in SIC's offices and in the presence of an individual appointed by SIC to maintain the files. Employees may also obtain copies of their personnel files upon request. SIC may charge a nominal copying fee.

SIC retains the right to black out any information in an employee's personnel file that relates to other employees.

All medical, workers' compensation, and I-9 records will be kept in a file(s) separate from the personnel file. These files are also kept in a locked file cabinet.

Anti-Harassment

SIC has an anti-sexual harassment and an anti-discrimination policy which is included in this handbook's appendices. Every employee is required to read this policy and acknowledge doing so via the acknowledgement page of the Personnel Handbook.

Auto Mileage Reimbursement

All employees will be reimbursed for business usage of personal cars, which can include use of an automobile locally for SIC business or travel to and from meetings that are located away from Star Island's business office or its island location. Employees must acquire approval from their supervisors or SIC's Finance Department prior to using a personal car for SIC business for which reimbursement will be required. Mileage reimbursement will only be issued when an employee provides a copy of the insurance policy declaration page covering the car to be used. Employees must submit the declaration page on an annual basis

in order to be eligible to receive reimbursement. If SIC does not have a current copy of an employee's auto insurance declaration page on file, that employee will be not be reimbursed for mileage.

Employees will be reimbursed at the current Internal Revenue Service mileage reimbursement rate. Employees are encouraged to use the most economical means of travel whenever possible, including carpooling, car rental (for longer trips – advance approval required) or, when authorized, the company van. Employees will not be reimbursed for a daily commute to and from work.

Background Checks

SIC performs criminal background checks, sexual offender registry checks, and driver record checks on certain exempt and non-exempt employees as part of an effort to provide a safe and secure environment and protect Star Island's assets.

It is the policy of SIC to conduct criminal background and sexual offender registry checks on all regular season employees. Sexual offender registry checks will be performed on all employees (including those who work for short durations during the end-of-season period). SIC will also conduct driver record checks on any employee routinely required to operate heavy equipment, automobiles and/or marine vessels.

Applicants for the specified positions will be advised that a criminal background, sexual offender registry check and/or driving record check is a condition of employment, and that the determination of either a job-related conviction or falsified conviction information on the application may result in denial or forfeiture of SIC employment. Convictions disclosed or discovered in the employment process will only influence the selection of the applicant where such information is determined to be job-related. In making the determination of job-relatedness, consideration may be given to the recentness of the conviction, the frequency and severity of the crimes, the honesty of the candidate in disclosing the information, and the candidate's subsequent work history.

SIC recognizes that its interests in investigating employees' backgrounds must be balanced with the need to protect the privacy of employees and prospective employees. SIC policy, as well as state and federal law, recognizes the individual's right to privacy and prohibits SIC employees from seeking, using, or disclosing information except within the scope of their assigned duties. Any information related to personal history, including conviction records, must be maintained in confidence. Only those personnel involved in the employment process should be informed and on a need-to-know basis.

Current employees who are selected for a position identified as requiring a background check are also subject to this requirement. Further, checks may be required for individuals identified at any point in the hiring process as having potentially job-related convictions, or as having misrepresented their conviction history or driving record on the application.

A preliminary offer may be made to the selected candidate, contingent on the results of the check. However, the selected candidate will not normally be allowed to begin work before completion of the process.

Any applicant or employee asked to undergo a check will be required to fill out an authorization form entitling Star Island to perform the requisite checks.

Business Meals

Employees who live on-island receive room (housing) and board (food), as part of their total compensation. If an employee is required to be off-island during the day and will thereby

miss a meal, the employee can prepare a bag lunch in the kitchen. A lunch set-up area is available daily for employee use.

Employees who choose not to use the food options available to them are responsible for any food expenses incurred while working off island. SIC does not provide meal stipends. However, in the event an employee is unexpectedly delayed or required to work an extended day on the mainland either due to transport disruption or at the direction of a supervisor, a meal stipend in the amount of \$10 may be provided. Prior approval by the employee's supervisor is required for said meal expenditures to be reimbursed. This should not preclude the employee from planning ahead and utilizing on-island food services when appropriate.

Portsmouth office employees who incur meal expenses when conducting business on behalf of Star Island may be reimbursed for said meal expense if it is pre-approved by the employee's supervisor.

Business Travel

SIC will reimburse employees for reasonable business travel expenses incurred while on assignments away from the normal work location. All business travel must be approved in advance by the employee's supervisor.

When an employee is away overnight on SIC business, SIC will pay for the employee's flight and hotel. SIC will also provide the employee with a per diem of \$50/day to cover the daily cost of meals, incidental living expenses and local transport during travel. Employees do not need to submit receipts for expenses covered by per diem though employees are expected to limit expenses to reasonable amounts. If the employee is traveling to a geographic location at which meal and incidental costs are likely to exceed the daily per diem, the employee may request additional per diem allowance in advance.

If travel expenses legitimately exceed the per diem amount, the employee may request reimbursement. If so, the employee should submit completed travel expense reports within 30 days after which the expenses will become ineligible for reimbursement. Reports should be accompanied by receipts for all individual expenses.

Child Abuse Policy

SIC has a child abuse policy which is included in this handbook's appendices. Every employee is required to read this policy and acknowledge doing so via the acknowledgement page of the Personnel Handbook.

Confidential Information

Star Island recognizes the importance of maintaining the security of personal information, and therefore complies with all laws regulating the retention of such information. Our objective is to create effective administrative, technical, and physical safeguards for the protection of employee and member personal information, and to comply with obligations under law and regulation. For purposes of this policy, "personal information" means an individual's first name and last name or first initial and last name in combination with any one or more of the following data elements that relate to such individual: (a) Social Security number; (b) driver's license number or state-issued identification card number; or (c) financial account number, or credit or debit card number, with or without any required security code, access code, personal identification number or password, that would permit access to an individual's financial account. "Personal information" shall not include information that is lawfully obtained from publicly available information, or from federal, state, or local government records lawfully made available to the general public. It is

important that employees do not reveal personal information about Star's employees or our conferees to third parties that do not need to know such information. It is the policy of Star Island to limit the amount of personal information collected to what is reasonably necessary to accomplish its legitimate business purposes, or to comply with other state or federal regulations. An employee's failure to comply with the standards set forth in this policy may result in disciplinary action, including but not limited to termination of employment.

Conflict of Interest

Star Island Corporation maintains a business culture that recognizes the implicit and explicit value that employees, and their families and friends can bring to Star Island. This conflict of interest policy is intended to balance that value with SIC's desire to assure the Corporation's financial and ethical interests are met in all areas of conducting business. The following procedures govern such business:

Employees have an obligation to conduct business in a manner that promotes Star Island Corporation's interests. Employees must disclose actual or potential conflicts of interest and participate in managing such conflicts in a manner that benefits the corporation. An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in personal gain for that individual, a relative, or a personal friend as a result of SIC's business dealings. For the purposes of this policy, a relative is any person related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

No "presumption of guilt" is created by the mere existence of a relationship with outside firms. However, if employees have any influence on transactions involving purchases, contracts, or leases, it is imperative that the employee disclose, to the relevant supervisor, the existence of any actual or potential conflict of interest at the immediate start of the SIC's consideration of said transaction, so that safeguards can be established to protect all parties.

Personal gain may result not only in cases where an SIC employee, relative, or personal friend has a significant ownership in a firm with which SIC does business, but also when an employee, relative, or personal friend receives any kickback, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving SIC.

In situations where there is actual or potential conflict of interest, the following rules apply:

For any business transaction under the amount of \$10,000, the Chief Executive Officer has sole discretion to allow or disallow said transaction, even and especially in areas where, absent a potential conflict of interest, a department head would typically make the decision. The Chief Executive Officer will use said discretion even in cases where the employee with the conflict is not the department head. Additionally, if the intent is to enter into an ongoing business relationship of any financial scale, the Chief Executive Officer has sole discretion and will a) approve the transaction and b) periodically review the relationship as needed. All such transaction information, regardless of whether for goods or services, will comply with bidding and review processes outlined in the Fiscal Handbook.

For all transactions where the potential or actual conflict of interest is related to the Chief Executive Officer, the Treasurer will review and decide on the transaction.

All year-round staff and senior seasonal staff are required annually to answer and submit a pecuniary benefit transaction questionnaire.

Credit Card Use

SIC allows employees the use of a corporate credit card. The Finance Department determines the need for an employee to have a credit card. You should only use a credit card if it is in your name or you have written authorization to make purchases with a credit card under another employee's name. The employee whose name is on the card is responsible for all charges made with the card and for the submission of receipts. Charges incurred without the submission of receipts are the responsibility of the employee named on the card.

Credit cards should not always be your first choice for making a purchase. SIC often has an account with a vendor or may have a store credit card. If you are uncertain as to the best method of payment, ask the Finance Department. In most instances, the best way is to plan ahead giving SIC the time to make a purchase in the most cost-efficient way.

Data Security Policy

SIC has a Data Security Policy which governs all aspects of the handling, storage, maintenance, access, use, disclosure, transmission, transportation, disposal, and destruction of Protected Information that belongs to the SIC or that is within the SIC's possession, custody or control. This policy applies to all SIC employees, data contractors, and all other persons who have access to or possession, custody or control of Protected Information. One of the main provisions of this policy is that Protected Information must be kept confidential and cannot be divulged. SIC takes its data security obligations seriously, and all employees are expected to comply fully with SIC's Data Security Policy. Questions about this policy should be directed to SIC's IT Manager.

Drug and Alcohol Use

It is SIC's desire to provide a drug-free, healthful, and safe workplace. To promote this goal, employees are required to report to work in appropriate mental and physical condition to perform their jobs in a satisfactory manner.

While on SIC premises and while conducting business-related activities off SIC premises, no employee may use, possess, distribute, sell, or be under the influence of illegal drugs, including marijuana. The legal use of prescribed drugs is permitted on the job only if it does not impair an employee's ability to perform the essential functions of the job effectively and in a safe manner that does not endanger other individuals in the workplace.

Excessive drinking is not tolerated at Star Island. At all times, ALL employees must be able to evacuate themselves appropriately, and must not be a danger to themselves or others, whether there is an emergency or not.

Underage Drinking

Drinking in any amount by anyone under 21 is illegal and is not permitted on Star Island under any circumstances, whether the employee is on or off duty. If a staff member under the age of 21 consumes alcohol, disciplinary action up to and including termination may be taken. Any employee who is caught providing alcohol to anyone under the age of 21 will be automatically terminated.

On Duty Drinking

Employees are not allowed to drink on duty *except* moderate consumption permissible in the course of duty at an SIC-sanctioned event where there is sanctioned alcohol (on- or off-island), and then only if it does not interfere with on-duty responsibilities pertaining to the

event. Examples might include a fundraising event, Annual Meeting, or Corporation-sponsored staff dinner. Under no circumstances can employees consume excessively.

Off Duty, Off Premises Drinking

SIC does not regulate the off-duty, off-premises drinking of its employees. However, consumption of alcohol, to the extent it would impair your performance, should be avoided prior to resuming your work shift for Star Island regardless of your work site location.

Policy Violations

Violation of SIC's Drug and Alcohol Use policy will be handled on a case-by-case basis which includes disciplinary action up to or including termination of employment.

Any employee who is suspected to be under the influence of alcohol or controlled substances on island and/or while performing services as an employee of SIC may also be subject to immediate discipline up to and including dismissal.

If an employee is determined to have a possible drinking problem, the SIC will make reasonable attempts to connect the employee with appropriate counseling services.

Violations of this policy may also have legal consequences.

Reporting of Drug or Alcohol Violations

Any employee observing a violation of this policy must report the violation to a senior management member immediately.

Emergency Watch

Under no circumstances should alcohol be consumed during the four hours prior to the performance of emergency watch duty as the effects of drinking up to four hours prior to duty may impair the employee's ability to make sound and thoughtful emergency decisions and may impact the safety of others.

Off Duty, On Premises Drinking

Employees may drink while off duty in designated areas of the island. Excessive drinking is not tolerated at Star Island. At all times, ALL employees must be able to evacuate themselves appropriately, and must not be a danger to themselves or others, whether there is an emergency or not.

Staff and/or conference sanctioned spaces for the consumption of alcohol include all staff living quarters, the Underworld (except during meal times), Shack Deck, Nichols, Lindquist Deck, Newton Centre, Marshman, Brookfield, and the lawn in front of Vaughn Cottage.

Drug Testing

SIC may request an employee to submit to drug testing at any time in the event SIC has any reason to believe that the employee is in possession of or has consumed excessive alcohol or a controlled substance. Any employee who refuses to submit to a requested drug or alcohol test without good cause shall be deemed to have failed the test. Any drug test which results in a finding of dilute shall be considered a failed test.

Marine employees may be required to undergo drug testing according to rules and procedures determined by the United States Coast Guard. Employees affected by this requirement will be informed prior to hire.

Failure to comply with these policies will result in disciplinary action up to and including termination.

Employment Applications

SIC relies upon the accuracy of information provided by the employee in the employment application, as well as the accuracy of other data presented throughout the hiring process and employment. Any misrepresentations, falsifications, or material omissions in any of this information or data may result in exclusion of the individual from further consideration for employment or, if the person has been hired, termination of employment.

Expense Reimbursement

Purchasing protocols are in place to assist employees in making required purchases and, if followed, should minimize the need for employees to expend their own funds. If normal purchasing procedures cannot be followed (see the Finance Department for details), an employee will be reimbursed for any reasonable expenditure. Requests for reimbursement must be submitted with receipts and an expense reimbursement form to the Finance Department no later than 30 days from the date of purchase.

Fire/Emergency Response

Due to its remote location it is imperative SIC take its life safety responsibilities seriously. While SIC abides by all the laws governing the sale and consumption of alcohol, clearly its obligations extend beyond legal requirements. Simply obeying the law does not ensure safety. The following policy details the procedures developed to ensure we provide the best protection and safety of our guests and employees.

At any given moment, 24 hours a day, seven days a week, SIC must be fully capable of responding to an emergency or fire. To that end, it is the expectation that an employee on emergency watch duty will consume no alcohol during the four-hour period preceding, as well as during, the assigned duty period.

All employees must respond to the fire alarm except for those employees who have signed the “off duty” list at the Front Desk.

1. At the beginning of the conference season, employees will be assigned to a specific emergency watch duty, and will receive training about how to respond to emergencies. Each employee will be assigned specific duty periods, during which **consumption of alcohol is prohibited.**
2. Emergency watch duties will be posted in Pel Hall and at the Front Desk, and employees will be reminded of duty shifts each night at dinner.
3. For each night an employee is assigned to be on duty, that employee must sign up in Pel Hall by the designated time that day.
4. Employees may remove themselves from an assigned duty period for any number of reasons and without explanation, including days off, illness, injury, etc. provided that they secure a replacement for the evening(s).
5. If an employee is unable to carry out assigned emergency watch duty for any reason, that employee must immediately find a replacement and leave the duty. Another person may remove an employee’s name from the watch list provided that employee has obtained a replacement for the watch. **An employee’s obligations for the duty period are not discharged until a volunteer has agreed to replace the employee for the remainder of the duty period and has signed in.**
6. An employee unable to carry out assigned emergency watch duty who fails to obtain a replacement may be removed from the watch by another employee who will serve in the employee’s place or will find another employee to fulfill the duty period. Failure to

remove oneself from emergency watch duty under these circumstances may result in immediate dismissal.

7. The safety of all island guests, volunteers, and employees is a shared responsibility, and employees are expected to fulfill their emergency watch duty obligations. However, SIC understands that not all employees will be able and willing to serve in this capacity. Requests for season-long exemptions from service may be directed to the Island Manager.
8. Employees may choose to volunteer to serve additional emergency watch duty shifts.

Nudity Policy

Public nudity is not permitted on the island.

Personal Appearance

Dress, grooming, and personal cleanliness standards contribute to the morale of all employees and affect the business image SIC presents to the community. While working, employees are expected to present a clean and neat appearance and to dress according to the requirements of their positions. Consult your supervisor if you have questions as to what constitutes appropriate attire.

Personnel Data Changes

It is the responsibility of each employee to promptly notify SIC of any changes in personnel data. Personal mailing addresses, telephone numbers, number and names of dependents, individuals to be contacted in the event of emergency, educational accomplishments, and other such status reports should be accurate and current at all times. If any personnel data has changed, notify the Office Manager.

Recycling

SIC supports environmental awareness by encouraging recycling and waste management in its business practices and operating procedures. This support includes a commitment to the purchase, use, and disposal of products and materials in a manner that will best utilize natural resources and minimize any negative impact on the earth's environment. Special recycling receptacles have been set up to promote the separation and collection of recyclable materials at SIC.

Safety

To assist in providing a safe and healthful work environment for employees, customers, and visitors, SIC has established a workplace safety program. This program is a top priority for SIC and its success depends on the personal commitment of all employees.

SIC provides information to employees about workplace safety and health issues through regular internal communication channels such as supervisor-employee meetings, bulletin board postings, memos, or other written communications. SIC has committees that assist in these activities and facilitate effective communication between employees and management about workplace safety and health issues. In addition to committee responsibilities, SIC urges all employees to take personal responsibility when illness and safety issues impact the community. Extra diligence in the areas of hand washing and personal hygiene help create a safe and positive community for everyone who works at or visits SIC.

Employees and supervisors receive periodic workplace safety training. The training covers potential safety and health hazards and safe work practices and procedures to eliminate or minimize hazards.

Some of the best safety improvement ideas come from employees. Employees with ideas, concerns, or suggestions for improved safety in the workplace are encouraged to raise them

with a direct supervisor, or with another supervisor or manager, or bring them to the attention of a member of a safety committee. Reports and concerns about workplace safety issues may be made anonymously if the employee wishes. All reports can be made without fear of reprisal.

Each employee is expected to obey safety rules and to exercise caution in all work activities. Employees must immediately report any unsafe condition to the appropriate supervisor. Employees who violate safety standards, who cause hazardous or dangerous situations, who fail to report a hazardous or dangerous situation, or, where appropriate, to remedy such a situation, may be subject to disciplinary action, up to and including termination of employment.

In the case of accidents that result in injury, regardless of how insignificant the injury may appear, employees should immediately notify their supervisors. Such reports are necessary to comply with laws and initiate insurance and workers' compensation benefits procedures.

Joint Loss Management Committee – New Hampshire state law requires SIC have a Joint Loss Management Committee (JLMC) to promote safety and health in the work place. SIC has a JLMC that is a collaborative effort between management and employees. Employee representation on the JLMC is determined through peer elections. See your supervisor if you are interested in participating on the JLMC.

Smoking and Open Flames

On Star Island, smoking and the lighting of matches, candles, incense, or any related materials (including e-cigarettes/vaping) is prohibited in all buildings. Outdoor smoking is allowed on specifically identified first floor porches and on the pier, and only in the presence of a “butt can” and when combustible materials (such as propane or gas tanks) are not present. Due to the danger of brush and grass fires, smoking is not permitted on the grounds on any part of the island, including the rocks. Specific exceptions to this policy for special events (such as a bonfire) or other such reasons are only permitted with prior approval of the designated manager on duty. No exception will be granted without prior clearance from authorized manager on duty. **Violators will be required to leave the island for the season on the next available boat.** (If the violator of this policy is an employee, employment will also be immediately terminated). Extreme caution should be exercised at all times, particularly when disposing of smoking materials. Do not extinguish smoking materials in trashcans; butt cans must be used and will be provided in designated smoking areas.

E-cigarettes/vaping and similar devices may only be used in designated smoking areas.

In accordance with New Hampshire state law, SIC does not tolerate tobacco usage by anyone under the age of 19.

Solicitation

In an effort to ensure a productive and harmonious work environment, persons not employed by SIC may not solicit or distribute literature in the workplace at any time for any purpose.

SIC recognizes that employees may have interests in events and organizations outside the workplace. However, employees may not solicit or distribute literature concerning these activities during work hours. (Work hours do not include lunch periods, work breaks, or any other periods in which employees are not on duty.)

In addition, the posting of written solicitations on company bulletin boards is restricted. If employees have a message of interest to the workplace, they may submit it to the Human Resources Department for permission to either post or distribute it.

Work Clothing

Certain SIC jobs require appropriate clothing and/or footwear. Employees are expected to provide the required clothing or footwear at their own expense; however, an employee experiencing a financial hardship may request financial assistance from SIC. See the Finance Director for the requisite form.

Social Media Policy

As part of SIC's commitment to building a community in which all persons can work together in an atmosphere free of all forms of harassment, exploitation, or intimidation when using SIC electronic resources to access on-line social networks, SIC community members are expected to act with honesty, integrity, and respect for the rights, privileges, privacy, sensibilities, and property of others. By doing so, individuals will be abiding by the applicable laws, including copyright law and SIC policy.

Social media use applies to employees' participation in any and all types of social media platforms and communication tools, collectively referred to as Social Media, including but not limited to:

- Blogs (e.g., external blogs or microblogs such as Twitter);
- Wikis (Wikipedia or any other similar sites);
- Multimedia or user-generated media sites (e.g., YouTube);
- Social outlets, including but not limited to: Facebook, Instagram, Snapchat, LinkedIn, Twitter;
- Virtual worlds (e.g., Second Life);
- Text messaging and mobile device communications; and
- Any other kind of Social Media or user-generated media that is currently active or that may become available after the publication of this Policy.

Employees with questions about the Social Media Policy should contact the Community Relations Manager or the Chief Executive Officer.

Social Media includes web applications that facilitate information sharing and collaboration including web-based communities, social networking sites such as Facebook and Linked-In, video-sharing sites, wikis, blogs and micro-blogs, mashups and countless others.

This policy applies to all employees who participate in Social Media or other online activity, regardless of whether SIC equipment is used, unless otherwise indicated herein. The intent of this policy is not to restrict the flow of useful and lawful communications, but to minimize the risk to all employees, and to SIC. This policy should not be interpreted to restrict employee communications that are otherwise authorized and/or protected by law.

Social Media Activity

Except when expressly authorized for work related purposes, employees are prohibited from using social media during "working time" and/or using SIC equipment. "Working time" does not include meal periods or other authorized break periods.

Employees are prohibited from using any online platform, including any form of Social Media, to post or display comments about coworkers, supervisors, or SIC that are vulgar, obscene, threatening, intimidating, harassing, knowingly false, defamatory and/or a violation of SIC's policies, including but not limited to its policies against discrimination and/or

harassment and its corporate disclosure policy. The same principles and guidelines that apply to SIC employees' activities in general also apply to activities online.

SIC recommends that supervisors or managers do not "friend" supervisees on Facebook and vice versa. Employees are not required to "friend" managers and/or supervisors; supervisors, managers, and co-workers are prohibited from coercing any employee, in any way, to gain access to any personal and private on-line information. SIC recommends that in general employees act with caution when "friending" any co-worker on Facebook and to consider private and personal information to which "friending" will provide co-workers with access.

Employees should use good judgment in online activities. Employees should make sure that information they post is accurate and honest. An employee should never post any information or rumors that the employee knows to be false and should always be fair and courteous towards SIC, fellow employees, managers, supervisors, customers, suppliers, or any other person working on behalf of Star Island Corporation. Employees are personally responsible for the content they post on social media. Any post that clearly depicts a violation of SIC's social media or any other SIC policy may result in disciplinary action up to and including termination.

The Corporation reserves the right to review publicly available personal data on social networking sites when making hiring decisions.

Permission to Use Star Island Policy

Star Island is private property, owned and operated by the Star Island Corporation, dedicated to religious and educational activities. Guests to the island, whether attending a conference or as day visitors, come to the island with permission from the Star Island Corporation. This permission may be revoked at any time if, in the sole discretion of those in charge of island operations, such action is deemed to be in the best interests of Star Island Corporation, its employees, or guests. Guests to the island are expected at all times to conduct themselves appropriately and in accordance with Star Island Corporation's published rules and regulations.

Whistleblower Policy

(Reporting of Improprieties)

Scope of Policy

Star Island is committed to facilitating open and honest communication regarding its finances, auditing, governance, and compliance with all applicable laws and regulations. It is important that Star Island be immediately notified about unlawful or improper behavior including, but not limited to, any of the following conduct: theft; financial reporting that is intentionally misleading; improper or undocumented financial transactions; improper destruction of records; improper use of assets, including but not limited to the taking or use of assets for personal use or benefit; violations of any of Star Island's policies; any improper behavior toward or among staff, seasonal or otherwise; and any other improper occurrence regarding cash, financial procedures, or reporting.

Star Island requests the assistance of every employee, director, and officer (collectively, "Star Island Team Members") who have a reasonable belief or suspicion about any unlawful or improper behavior or transaction.

No Retaliation for Reporting

Star Island values this input and each Star Island Team Member should feel free to raise issues of concern, in good faith, without fear of retaliation. Star Island Team Members will not be disciplined, demoted, lose employment, or otherwise retaliated against for asking questions or voicing concerns about conduct of this sort. At the same time, Star Island expects all team members to take this policy seriously, to use it in good faith, and to use it when necessary and in a judicious manner. Reports that are not made in good faith, or otherwise are intended to harass another team member, may result in disciplinary action, including termination.

Making a Report

We encourage any team member who has a concern regarding an action concerning SIC's governance, finances, or compliance with all applicable laws and regulations to raise the concern with the relevant supervisor, SIC's Human Resources Department, or the Chief Executive Officer. If for any reason the team member does not believe these channels of communication are adequate, the concern should be reported immediately, in writing, to the President of Star Island Corporation's Board of Directors. All reports will be handled on a confidential basis. Anonymous reports will be accepted, though they are often harder to investigate and evaluate. The contact information for the Board President is below. Star Island team members should mark the envelope containing the report: "TO BE OPENED BY ADDRESSEE ONLY: PERSONAL AND CONFIDENTIAL." The Board President will lead an investigation and will take action deemed appropriate under the circumstances, which may include formation of an ad hoc committee, use of the Board's Executive Committee, and/or other actions.

Posting and Update of Policy

This policy is to be posted in the office of Star Island Corporation, and communicated to all new Star Island Team Members. In addition, after the election of a new Board President, Star Island Corporation's Human Resources Consultant or the Chief Executive Officer will have the responsibility of updating the contact information for this individual and then sending the policy with the updated contact information to all Star Island team members.

Contact Information

Nick Dembsey, Board President
16 Winslow Street
Shrewsbury, MA 01545
board@starisland.org

SUPERVISION/EVALUATION

Performance Evaluations

Supervisors and employees are strongly encouraged to discuss job performance and goals on an informal, day-to-day basis.

- ❖ The job performance of **year-round** employees is evaluated via the following process:
 - A formal written performance evaluation may be conducted at the end of an employee's initial period of hire, known as the probationary period. Additional formal performance evaluations are conducted to provide both supervisors and employees the opportunity to discuss job tasks, identify and correct weaknesses,

encourage and recognize strengths, and discuss positive, purposeful approaches for meeting goals.

- The performance of year-round employees is generally evaluated according to an ongoing 12-month cycle, which may be determined by the employee's hire date or work pattern.
- ❖ The process for evaluating job performance for **senior seasonal staff** takes place at the end of the conference season. These employees are not required to undergo the probationary period review, though SIC retains the right to perform such an evaluation if it chooses. Pelican employees will have an opportunity to contribute to the evaluation of on-island senior staff employees on the same schedule as that of Pelican employee evaluations.
- ❖ The process for evaluating job performance for **Pelican employees** is two-step. There is an initial mid-season evaluation in July and a second end-of-season evaluation in August.

Performance evaluation for all employees, regardless of classification, entails a self-evaluation and a supervisor evaluation. Each employee has a face-to-face meeting with the relevant supervisor to discuss the overall review, to review major accomplishments, and/or to address work performance issues. Any employee who disagrees with all or part of this evaluation may provide a written statement communicating this disagreement, which will be included in the employee's personnel file.

Progressive Discipline

SIC generally utilizes a progressive discipline policy. Progressive steps will be followed in employee disciplinary matters except in matters which SIC, its representatives, or its management determine need to be addressed outside of the progressive system.

Normally, the employee's immediate supervisor, in consultation with the Human Resources Department, will administer any appropriate corrective or disciplinary action. Appropriate action will be determined based on factors such as severity, frequency, and degree of deviation from expectations, and length of time involved. Because of the great variety of situations that may arise, SIC may need to make decisions related to employment in a manner other than as provided in this section.

Pelicans can have an ombudsperson present at formal disciplinary meetings during the progressive discipline process. Pelicans will be informed of this right when notified of the need for a disciplinary meeting. Suggested ombudspeople are members of the Community Action Team, Res Life Pels, and Pels-at-Large, though employees may choose somebody else. This option may not be available in the case of next boat offenses or urgent issues where logistics prevent it.

Disciplinary actions may take place in several forms, such as verbal counseling, written counseling, suspension and/or dismissal. The form of discipline to be imposed is to be determined at the sole discretion of SIC. An employee who disagrees with the form of prescribed discipline should follow up with the Human Resources Department.

Verbal Counseling

Verbal counseling sessions may take place between employees and supervisors in situations that are deemed less serious in nature. Every effort to determine and resolve the cause of the problem should be made. At the same time, however, it should be specifically stated that the

employee is receiving a formal warning. Documentation of the verbal counseling should be made and maintained in the employee's personnel file for verbal counseling sessions.

Written Counseling

Written counseling sessions take place between a supervisor and an employee when the behavior of the employee: is a repeated violation and verbal counseling has been administered; hinders the progress of the department in which the employee works; or hampers the progress of the SIC. Written warnings should be documented and copies should be distributed as follows: one copy to the employee and one copy to the employee's personnel file.

Suspension

Suspension, or release from duty, is a more severe action that may be used to continue investigations and/or for constructive improvement. Suspensions are issued when it is determined that a second warning would not suffice or that an initial incident is too severe for a warning yet not sufficiently severe for dismissal. Suspensions may vary in length, according to the severity of the offense or deficiency. Where a suspension has failed to produce the proper results, consideration should be given for a more lengthy suspension or the dismissal of the employee.

Copies of all suspensions should be distributed as follows: one copy to the employee and one copy to the employee's personnel file.

Suspension notices should indicate the reason(s) for the discipline and the inclusive dates of the suspension

Dismissals

An employee may be terminated after other disciplinary measures have failed or when a first-time incident occurs that is extremely serious. An employee may be discharged at any time without regard to any progressive steps if the employee commits an offense for which immediate discharge is specified as a penalty or if, in SIC's judgment, the employee's continued presence would be contrary to the well-being of the Corporation, its employees, volunteers, or guests.

COMMUNICATION

Employment Terminations

It is SIC's policy to discuss employee terminations only with staff that are immediately involved with the termination. All personnel matters are kept confidential to the extent possible, including employment terminations.

However, SIC understands that its employees, volunteers, and conferees are interested in the well-being of the other members of the Star Island community and therefore may be curious to know the particulars of an employee's departure. Though SIC cannot discuss the particulars of an employee's departure from Star Island, we can create an opportunity for the employee to do so. With that in mind, SIC will follow the protocol below when a resident Star Island employee is leaving employment, unless the employee's departure was predetermined via an employment agreement in which case no special notice regarding the employee's departure will be given:

1. SIC management will notify the head of Pel Council that the employee is departing.

2. Before the employee departs, SIC will advise the employee of the option to communicate a message about the departure to the greater Star Island community via the head of Pel Council.
3. SIC will provide an opportunity for employees to discuss the employee's departure with senior management via a public meeting or one-on-one; the type of opportunity may be dependent on other factors, such as time of season.

SIC also recognizes that employees will likely be in touch with friends they have made on Star Island after they have left employment. In this context, employees are free to discuss their employment at SIC.

SIC encourages its employees to speak to senior management whenever they have concerns regarding an employee's departure. SIC also asks that employees respect employee confidentiality and SIC management's responsibility to protect it.

Open Door Policy

SIC is committed to providing the best possible working conditions for its employees. Part of this commitment is encouraging an open and frank atmosphere in which employees are encouraged to use interpersonal skills and communication to independently discuss and resolve problems. As well, employees are encouraged to approach management with problems and complaints and receive a timely and constructive response.

SIC strives to ensure fair and honest treatment of all employees. Supervisors, managers, and employees are expected to treat each other with mutual respect. Employees are encouraged to offer positive and constructive criticism. If employees disagree with established rules of conduct, policies, or practices, they can express their concerns to management. No employee will be penalized, formally or informally, for voicing a complaint with SIC in a reasonable, business-like manner.

Not every problem can be resolved to everyone's total satisfaction, but it is through understanding and the discussion of mutual problems that employees and management develop confidence in each other. This confidence is important to the operation of an efficient and harmonious work environment.

If an employee believes that a problem or a management decision affecting the employee is unjust or inequitable, and the employee has been unable to resolve the issue independently, the employee is encouraged to use the SIC *Grievance Procedure* as detailed below.

Grievance Procedure

The SIC Grievance Procedure exists to enhance the well-being and safety of all members of the Star Island community. It does not replace the practice of professional and courteous problem resolution. If you have a grievance, ask yourself if you have first tried to resolve the problem or complaint using interpersonal skills, such as open communication, constructive criticism or third-party mediation through a supervisor or other Star Island community member. If you have, and your grievance remains unresolved, this procedure exists to address such circumstances. **If at any time you feel unsafe, seek immediate assistance.** Grievances can be of a variety of natures, all of which will be addressed through the grievance procedure outlined here, though some grievances may require additional or alternative steps, particularly grievances involving minors. Employment termination is addressed in SIC's *Progressive Discipline* policy (see **SUPERVISION/EVALUATION**) and is not eligible for review under the Grievance Procedure. Details of this grievance policy are also listed in the individual policies that prohibit discrimination, harassment and child abuse

and should be reviewed by all employees annually and as part of this personnel handbook (see appendices).

The Chief Executive Officer, annually, will serve as the Grievance Officer or will appoint a senior staff person of the Star Island Corporation as the Grievance Officer, who will be vested with the authority and responsibility of processing employee, conferee and volunteer complaints. An Alternate Grievance Officer(s) may also be designated. In the event the complaint is against the Grievance Officer when not the Chief Executive Officer, the complaint will be heard by the Chief Executive Officer. In the event the complaint is against the Chief Executive Officer, the complaint shall be heard by the President of the SIC Board of Directors or a person designated by the President.

For this year, Joe Watts (the Chief Executive Officer) has appointed **John Bynum (Island Manager and Food Service Manager) as the Grievance Officer, and Justina Maji (Conference Center Director) as the Alternative Grievance Officer.**

Any member of the Star Island community who has a grievance may report the incident(s) to the Grievance Officer. Anyone (employees, conferees, etc.) can raise concerns and make reports without fear of reprisal. The grievance policy is available for all grievances of a serious nature, including but not limited to incidents of sexual harassment, non-sexual harassment, safety, and child abuse. **NH law requires that any person who suspects an instance of abuse, harassment or neglect of a minor has occurred must report said instance to the State of New Hampshire and can do so by contacting the Division for Children, Youth and Families (DCYF) directly at 1-800-894-5533. Such instances should also be immediately reported to the Star Island Grievance Officer, who can facilitate a report to the DCYF.**

Grievance reports will be handled by the Grievance Officer in a timely and confidential manner.

When a grievance is made, the following process will be used to reach a disposition that protects the safety of all while on Star Island, in the SIC office, or doing the business of the Corporation:

- 1) The Grievance Officer's first step will be to confer with the charging party in order to obtain a clear understanding of that party's statement of the facts. The allegations should be in writing and signed by the reporting party.
- 2) The Grievance Officer will then meet with the charged party in order to obtain a response to the complaint. In cases involving a minor, the Grievance Officer will take whatever action necessary to ensure the child's safety and will guard against subjecting the child to multiple interviews by deferring any investigation to the proper authorities, if applicable.
- 3) The Grievance Officer will hold as many meetings with the parties as is necessary to gather facts, and, if necessary, to interview witnesses.
- 4) In the course of taking any action, the greatest degree of privacy and confidentiality possible shall be maintained by all parties involved in the grievance.
- 5) The Grievance Officer will keep a written record of information gathered throughout the process of resolving the complaint and shall complete a written record of any findings.

- 6) When a person other than the Chief Executive Officer, the Grievance Officer will transfer the record of the investigation to the Chief Executive Officer, and so notify the parties.
- 7) After reviewing the record, the Chief Executive Officer or the designee will decide the next appropriate action. Additional information will be gathered if deemed necessary to resolve the matter formally or informally. With the consent of the reporting party, the Grievance Officer may mediate a resolution between or among the parties. In cases involving a minor, additional information may be gathered if deemed necessary to protect the welfare and ensure the safety of that minor, and that of other children and adults.
- 8) Thereafter the Chief Executive Officer or the designee shall impose any sanctions deemed appropriate, including, without limitation, a warning, suspension, or termination. Any disciplinary action shall be processed in accordance with all requirements of law.
- 9) If a person filing a complaint does not believe the situation has been satisfactorily resolved, that person should then bring the complaint to the Star Island Board of Directors. The Board of Directors will determine if further investigation of the grievance is warranted. If the Board determines further investigation is not warranted, the grievance will rest resolved as determined by the Grievance Officer and/or the Chief Executive Officer. If the Board determines that further investigation is warranted, a panel of three board members and/or their designees will convene to proceed with the investigation.
- 10) Retaliation against any person who has filed a grievance or cooperated in an investigation regarding a grievance is unlawful and will not be tolerated.
- 11) This Grievance Procedure shall be given to all new employees upon appointment and shall be distributed annually to all employees and conference chairs/leaders.

Copies of this policy shall be referenced in the handbook, *Island Living*, with copies available to guests and other visitors, and included as well in manuals developed for administrators and staff of the SIC.

LEAVING STAR ISLAND

Benefits Continuation (see also *Benefits Continuation* under Employee Benefits)

Once employment at SIC is terminated, an employee and/or the employee's beneficiaries may elect to continue health and dental insurance coverage under NH state or federal law. Employees will be provided notice of the actions that must be taken to ensure continuation of benefits within the time periods prescribed by law.

The employee will be required to accept continuation of benefits within a specified period, typically no later than 60 days from written notification of any continuation benefits.

Post-Employment References

While SIC understands that employees often expect to receive a substantive employment reference for a new job, school or other purposes, SIC must also protect itself from lawsuits stemming from the provision of such references. Accordingly, SIC will provide qualitative references only for those employees who have signed a Waiver of Liability Regarding Reference Request Form (please find at the end of the handbook). If an employee does not sign the waiver, then SIC will only provide the following information:

- ❖ Confirmation that the individual was or is an employee of the organization

- ❖ Dates of employment
- ❖ Confirmation of the employee's pay rate and job title

No other information will be divulged.

SIC will withhold the provision of any references for any employee who fails to return all SIC property in working condition prior to termination of employment.

Only the Human Resources Department may respond to a reference request, unless the employee was seasonal and worked on Star Island, in which instance the Conference Center Director can respond to a reference request. Any other reference will be considered a personal, not an organizational, reference. The employee must give the relevant supervisor a copy of the signed waiver before the supervisor can respond to a reference request.

Resignation

Resignation is a voluntary act initiated by the employee to terminate employment with SIC. Although advance notice is not required, SIC requests at least two weeks' written resignation notice from all employees.

Prior to an employee's departure, an exit interview may be scheduled to discuss the reasons for resignation and the effect of the resignation on benefits.

SIC Property

Employees are responsible for all SIC property, materials, or written information issued to them or in their possession or control. All SIC property must be returned by employees on or before their last day of work.

All SIC data created by the employee on SIC equipment and/or equipment owned by the employee belongs to SIC.

ISLAND BENEFITS AND POLICIES

The nature of SIC's business requires that a majority of employees live on Star Island for the conference season; some employees will spend up to half a year on the island. For employees living on the island and their immediate families, SIC provides a basic level of accommodation as part of a compensation package: Year-round and eligible professional seasonal staff who are required to live on the island are allowed to have their immediate family reside on the island as well at no cost to them. **For the purposes of island benefits, SIC defines "immediate family" as a spouse or domestic partner and the children of the employee.** Island benefits are provided at varying levels and depend on employment classification and island residency requirements. Benefits are detailed below.

SIC has also created policies that allow employees to have guests on island. In all instances it is expected that SIC employees living on the island and their guests will conserve resources and comply with all island rules and regulations. As well, employees will use guest privileges with discretion and in moderation so that all employees may partake while minimizing the environmental impact on the island and the financial impact on SIC.

Babysitting Assistance

SIC may provide babysitting assistance to eligible senior seasonal and year-round employees who reside on Star Island during the conference season. The nature of the babysitting assistance will vary depending on the total population of children on island and the options available for providing babysitting. Eligible employees with children should inform SIC management by February 1 of each year (or upon hire if that occurs later) if childcare assistance will be needed while residing on Star Island.

Food

All employees receive three meals a day for themselves and their immediate families that are residing (not visiting) on the island with them. Most employees eat their meals in Pel Hall. Some employees may eat in the main dining hall at a table specifically reserved for Star Island staff. Employee meal times are typically one hour earlier than conferee meal times; staff choosing to eat in the main dining hall will eat at the same time as conferees.

Laundry Service

All employees have access to on-island laundry service for themselves and their immediate families who are residing (not visiting) on island with them. For specific rules regarding the use of laundry service see *Island Living*.

Lodging

Lodging is generally provided for eligible employees and their immediate families. Eligible employees are typically senior seasonal staff and some year-round employees. Knowing the level of seasonal accommodation required by an employee is important and is generally assessed during the hiring process. For Pelicans, lodging is provided for the employee only. Lodging accommodations on Star Island are generally rustic and do not allow for use of major and some minor electrical appliances, including but not limited to computers, hair dryers, irons, etc. Accommodations also include a variety of shared and private living arrangements, and though employee preferences are considered they cannot always be met. Accommodations do include basic linens, such as sheets and towels, as well as basic furniture, such as beds, dressers, and chairs.

Parking

Parking for employees traveling to and from Star Island is available to some SIC senior seasonal staff and year-round employees on an as-available basis. Parking availability is subject to change based on the limitations and restrictions of SIC's contracts for leased parking spaces and SIC budgetary constraints. SIC cannot provide parking to Pelicans.

Pets on Star Island

Staff generally may not have pets (including but not limited to dogs, cats, rodents, birds, turtles, snakes, fish, and exotic wild animals) on Star Island. There are several reasons for this, the most important being that conferee/animal interaction can be difficult to control, and some health risks can arise from having pets on the island. Examples include the spread of poison ivy from pets to people, negative interactions between island pets and wild animals on the island, and potential antisocial pet behavior with regard to people or other pets.

Caged animals may not be brought to the island. For senior staff who must live on the island as a job requirement, allowances for cats or dogs may be made in certain cases where a staff member cannot make other arrangements for the animal.

Senior staff is offered the opportunity to make such requests because they are usually afforded at least semi-private living quarters separate from conferee areas. The concentration of people in Pelican housing makes it poor quality space for housing animals.

However, during the off-season, during open-up and close-up, both senior staff and Pelican employees can make a request for pet accommodations.

The Island Manager will consider requests to bring pets on a case by case basis.

Considerations will include:

- ❖ Temperament and age of the animal
- ❖ History of care

- ❖ The number of other animals living on the island already
- ❖ Appropriate available housing and potential allergies or discomfort of co-housed staff members.
- ❖ No animals with a history of aggression toward people or other animals will be allowed on Star Island.

Animals not approved for living on the island must be cared for (kenned or other arrangements) at the expense of the employee.

A staff member with an approved pet must:

- ❖ Show evidence of an up to date rabies vaccination prior to bringing the pet onto the island.
- ❖ Restrict cats to the inside of the staff person's living quarters at all times.
- ❖ Restrict dogs to being outside only on a leash during the main season.
- ❖ Keep pets out of prohibited areas including conferee areas during the main season, and food service areas and the first aid station at all times.
- ❖ Pick up and dispose of all animal waste.
- ❖ Defer to the comfort of Star Island guests at all times. If a volunteer or conferee exhibits any discomfort about being near a pet, the staff person must keep the pet away from the areas that person may be in.

Violation of these restrictions on pets may result in disciplinary action up to dismissal of the employee.

Service animals are not considered pets and are therefore not covered under this policy.

Transportation

SIC uses a combination of its own boats and contracted boats for use in transporting employees back and forth to Star Island. Your initial arrival date on the island and final departure date is typically determined by the Conference Center Director and based on the requirements of the job. Pelicans are provided transport to and from Star Island at no cost, for themselves only. Senior, seasonal, and year-round Employees are provided transport to and from Star Island at no cost, for themselves and their immediate family. Family members of Pelican staff must pay for their own transport. Due to Coast Guard regulations, SIC is unable to transport guests of any employee. Guests must arrange for transport independently and at their own cost. SIC has made arrangements for reduced cost boat tickets with at least one contracted boat service. Arrangements for reduced cost tickets must be made in advance. Before the full conference season begins, arrangements for transport are made through the SIC facilities staff but typically transfer over to the Star Island Front Desk in June.

SIC boats run on a limited schedule and the number of passengers they can carry at any time is limited. Employees should be aware of the travel restrictions and plan ahead as much as possible when arranging for transport to and from the island. As well, SIC boats are affected by inclement weather and may not run as scheduled due to weather events.

Guests

SIC employees are allowed to have overnight and day visitors on island. At no cost, professional seasonal staff and year-round employees can have on-island guests a reasonable number of times per season (a number of "bed nights" is defined each season), minimizing the number of guests per occurrence. What is reasonable will be determined by the CEO.

Lodging and food will be provided for these guests, again assuming the number of guests is limited and within reasonable expectations.

Pelicans can have on-island guests as well. Pelican guests are provided food and lodging at a discounted rate and must arrange for their own transport to and from the island. All on-island guests are allowed to use employee lodging if it is appropriate and workable within the confines of shared rooming arrangements. Any infraction of Star Island regulations or policies by an employee's guest may result in disciplinary actions against the employee, up to and including termination.

Mainland Business Office Employees

Most year-round employees will be required to periodically work on the island during the conference season. Whenever this is required, the employee will be provided, at no cost, with transport and food as well as lodging, if needed. Parking will also be available to year-round employees according to the terms indicated above for senior seasonal staff. Year-round employees who do not reside on island but would like to use its facilities for recreational purposes for themselves and/or with their families may do so with the following restrictions. One time per season for up to two nights, employees and their families will be provided food and lodging at no cost. Transport will be provided to the employee and may be provided to the employee's immediate family based on availability. Year-round employee requests to use the facilities for recreational purposes will be subordinate to Pelican requests since Pelicans are required to reside on island and these services provide them with an opportunity to visit with family and friends. If a year-round employee wishes to use the island facilities more than one time per season, they may do so at a discounted cost for lodging, food and transport with the same restriction that this request is subordinate to Pelican requests.

EMPLOYEE BENEFITS

Benefits eligibility is determined based on hours worked and employment duration. Employees who work 30 hours or more per week for at least nine (9) months of the calendar year are eligible for most SIC benefits. Part time and/or seasonal employees are eligible for limited paid time off as outlined in their employment offers or below.

Health and Dental Insurance Benefits

SIC provides an opportunity for eligible year-round employees and seasonal staff who work nine months or more during the year and who are regularly scheduled to work at least 30 hours per week to participate in health and dental insurance programs designed to provide support for preventive health care, and to protect employees and their families from financial hardship caused by unanticipated illnesses. Newly hired employees may obtain and submit a completed group insurance application for approval by the insurance company. Approval and acceptance will be based on the terms and conditions of each plan. Upon acceptance by the insurer, insurance for new employees will become effective on the first day of employment or eligible status. Employees should contact the Human Resources Department for an explanation of benefits and costs of each plan.

If an employee declines enrollment because of other health insurance coverage, the employee and/or the employee's dependents may be eligible to enroll in the group health plan in the future based on the terms of the plan. Similarly, if an employee gains new dependents as a result of marriage, birth, adoption, or placement for adoption, the employee and/or the employee's dependents may be able to enroll in the group health plan if eligible under the plan.

SIC pays a portion of the monthly health and dental insurance premiums for individual and family coverage. Employees contribute the remaining balance through payroll deductions. Employees should contact the Human Resources Department for current health insurance rates. In all cases, the actual plan documents are controlling.

SIC's health plans comply with the standards of the Affordable Care Act. For more information contact the Human Resources Department.

Section 125 Plan

Employees who are eligible for health insurance through SIC can use pre-tax dollars to pay for the employee contributions to the health insurance premiums. Employees must enroll within thirty (30) days of eligibility. Employees should contact the Human Resources Department for more information.

Health Savings Accounts

Eligible employees enrolled in the group PPO plan may participate in SIC's Health Savings Account Program. HSA participation is limited to employees who are enrolled in high deductible plans (SIC's PPO plan). Contributions are made into the account by the individual and/or SIC and are limited to a maximum amount each year determined by the IRS. The contributions are invested over time and can be used to pay for qualified medical expenses, which include most medical care costs such as dental, vision, and medication. These accounts are owned by employees. More information on this program is available through the Human Resources Department.

Health Reimbursement Accounts

Eligible employees enrolled in the group PPO plan may participate in SIC's Health Reimbursement Accounts Program. This account is an employer-funded reimbursement account that may be used by SIC to reimburse staff for designated health insurance deductibles. See the Human Resources Department for more information.

Continuation of Coverage under Group Health Plans (COBRA)

Continued coverage under SIC's group health plans may be available to you under applicable state and federal laws following separation from employment from SIC and in certain other circumstances. Continuation of coverage may also be available to your spouse and eligible dependents at the time of separation from employment and in certain other circumstances. Unless otherwise provided by applicable law, the cost of coverage would be paid entirely by you, and may be subject to an administrative fee. Please contact the Human Resources Department for additional information regarding COBRA.

Life Insurance

SIC provides life insurance coverage to each eligible year-round employee and seasonal staff regularly scheduled to work nine months or more during the year and at least thirty (30) hours per week. Coverage begins on the first day of employment or eligibility, and ends on the date of termination or retirement and is paid in full by SIC. SIC provides employees with group life insurance up to \$50,000 and additional insurance may be purchased by the employee as governed by the plan documents. Employees should refer to the plan documents for further details and contact the Human Resources Department for additional information about the plan. In all cases, the actual plan documents are controlling.

Disability Insurance

To protect employees against salary loss due to an accident or illness that results in an extended disability, SIC provides each eligible year-round employee and seasonal staff scheduled to work nine months or more during the year and thirty (30) hours per week with short and long-term disability insurance coverage. SIC pays 100% of the disability premiums for qualified employees. Coverage begins on the first day of employment and ends upon termination. Employees should refer to the plan documents or contact the Human Resources Department for further details. In all cases, the actual plan documents are controlling.

Retirement and Employer Contributions

SIC provides exempt employees scheduled to work at least 25 full-time weeks per year, and non-exempt employees scheduled to work at least 1,000 hours per year, with the opportunity to voluntarily supplement future retirement income by means of a 403(b) retirement plan that allows pre-tax dollars and post-tax dollars to be set aside for retirement.

Additionally, SIC will contribute the equivalent of 5% of an employee's earned salary to the 403(b) annuity plan starting one year after the employee's start date. Employer contributions are 100% vested to the employee two years after the employee's start date. Employees may make contributions to the 403(b) up to the legally allowed amounts; this amount will vary based on age. See your plan document or the Human Resources Department for specific information on contribution limits.

The preceding is a summary only. Actual benefits are governed by the plan documents that are subject to modification.

Statutory Benefits

Workers' Compensation

All SIC employees are covered by Workers' Compensation insurance for work-related injuries and illnesses. Workers' Compensation insurance benefits provide protection in the event that an employee is injured in an on-the-job accident or experiences an occupational illness.

An employee's first responsibility is to make sure that the work area is safe. Prevention is the key. If an employee is concerned that a work area is not safe, or if an employee is involved in an accident, no matter how minor it seems, the employee must notify the relevant manager immediately. In the case of an accident, an employee's manager will assist the employee in obtaining medical care and navigating through the process.

Workers' Compensation insurance benefits do not cover injuries that occur during an employee's voluntary participation in any off-duty recreational, social or athletic activity sponsored by SIC.

SIC pays the total cost of this insurance. Coverage applies to approved medical charges and may provide partial payment for lost wages surrounding the injury, as provided by law.

Social Security

During employment with SIC, employees contribute a specified percentage of their earnings and SIC pays an equal amount for the benefits provided under the Social Security program.

In addition to retirement benefits, the program also provides benefits for eligible employees and their dependents in the event of disability.

LEAVE BENEFITS

Bereavement Leave

Employees who wish to take time off due to the death of an immediate family member should notify their supervisors immediately. For this purpose, SIC defines “immediate family” as grandparents, parents, brothers, sisters, children and grandchildren of the employee or the employee's spouse/domestic partner. Also included is any relative living in the immediate household of the employee.

Up to five days of paid bereavement leave will be provided to year-round employees. Senior seasonal and Pelican employees who work two months or more during a conference season are eligible for three days of bereavement leave. Employees may, with their supervisors’ approval, use any available paid leave for additional time off as necessary.

Crime Victim Leave

In accordance with NH RSA 275:61, employees who are victims of a violent crime or who have an immediate family member who is a victim of a violent crime may take unpaid leave in order to attend court or to address other legal or investigative matters associated with the prosecution of the crime.

For this purpose, SIC defines “immediate family” as grandparents, parents, brothers, sisters, children and grandchildren of the employee or the employee's spouse/domestic partner. Also included is any relative living in the immediate household of the employee.

Holiday Leave

SIC typically offers thirteen (13) paid holidays per calendar year to regular, full-time, year round employees as follows:

- ❖ New Year’s Day
- ❖ Martin Luther King Day
- ❖ Presidents’ Day
- ❖ Memorial Day
- ❖ Independence Day
- ❖ Labor Day
- ❖ Veterans’ Day
- ❖ Thanksgiving
- ❖ Day after Thanksgiving
- ❖ Christmas Day
- ❖ Three floating holidays (dates must be approved by employee’s supervisor)

When a holiday falls on a Saturday or Sunday, it usually is observed on the preceding Friday or following Monday.

Floating Holidays are days that employees may take off for religious observance or other personal reasons. Floating Holidays may not be accumulated and carried over from one calendar year to the next and are not paid if unused prior to termination of employment. A

request to take a day off as a Floating Holiday must be approved in advance by the employee's supervisor.

To be eligible for holiday pay, an eligible employee must be regularly scheduled to work on the holiday and must work the scheduled working days immediately preceding and immediately following the holiday, unless an absence on either day is approved in advance by the employee's supervisor. When a holiday falls during an employee's approved vacation time day(s), the employee will be paid for the holiday without having that day charged against accrued vacation time. When a holiday falls on a regular scheduled work day, year-round part-time employees who work 20 or more hours per week are eligible for prorated holiday paid time off based on the number of hours normally worked that day. Full-time seasonal staff scheduled to work more than nine months or more during the year are eligible to take off holidays that occur during their period of employment, as well as a prorated amount of floating holidays.

Exempt staff who work on a holiday may take another day off in place of that holiday. This exchange must be approved in advance with the employee's supervisor.

Jury Duty Leave

SIC encourages employees to fulfill their civic responsibilities by serving jury duty when required. Eligible year-round employees who work 30 hours or more per week will be paid for the jury duty leave for the entire length of the absence. Due to the seasonal nature of SIC's business, no seasonal staff are eligible for paid jury duty leave.

Employees must show the jury duty summons to their supervisors as soon as possible so that the supervisors may make arrangements to accommodate the absence. Employees are expected to report for work whenever the court schedule permits.

The employee will remain enrolled in all SIC employment benefit plans for which the employee is eligible and enrolled, for the full term of the jury duty. The employee will also continue to earn leave time for which the employee is eligible, during the full term of jury duty.

Personal Days

SIC provides paid personal days to eligible employees who wish to take time off to fulfill personal obligations. Full-time, year-round employees can earn up to 4 personal days annually. For employees who are not full-time, personal days are earned on a pro-rated basis. Due to the seasonal nature of SIC's business, seasonal staff are not eligible to receive personal days.

The scheduling of personal days off is subject to a supervisor's approval. Unused personal days cannot be carried forward from year to year. If not used in the year they are earned, these days are forfeited. Accrued, unused personal days are not paid upon voluntary or involuntary termination from employment.

Sick Leave

SIC provides paid sick leave benefits for periods of temporary absence due to illnesses or injuries to year-round full-time employees; sick leave is typically used for illness and injuries of shorter duration that do not require extended time off from work.

Full-time employees who work more than nine months per year are granted up to 12 sick days per calendar year. Part-time year-round employees working 20 hours or more can earn sick time on a pro-rated basis. Unused sick leave benefits will be allowed to accumulate until a total of up to 90 days' worth of sick leave benefits has been accrued, after which further accrual of sick leave benefits will be suspended until the balance falls below the maximum. An employee with an agreement to work during one calendar year only (employees who work less than nine months per year) may not accrue any sick days beyond the end of the calendar year in which they are employed, even if they are hired to work again in the ensuing year.

Any employee who is unable to report to work due to illness or injury should notify the relevant direct supervisor before the scheduled start of the workday, if possible. The direct supervisor must be notified on each additional day of absence.

The above rules apply to all eligible employees, excluding senior seasonal and Pelicans. These employees earn one paid sick day for each expected full month of seasonal employment. For example, a Pelican working 2.5 months will have two paid sick days available during the Pelican's seasonal employment. Likewise, a senior seasonal staff member who works 8 months during the year will earn one day of sick leave for each full month of seasonal employment, or 8 days. Sick days do not carry beyond the employee's term of employment and the employee is not remunerated for unused sick days.

Pelicans must have approval from their supervisors and the island medical staff to be taken off the work schedule. A Pelican who cannot return to work within two or three days because of illness or injury may be asked to return home for a medical evaluation and recuperation. Senior seasonal/temporary employees must have approval from their supervisors before being taken off the work schedule.

All eligible employees may use sick leave benefits for an absence due to their own illness or injury or that of an immediate family member. For this purpose, SIC defines "immediate family" as a spouse, grandparents, parent, brother, sister, children and grandchildren of the employee or the employee's spouse/domestic partner. Also included is any relative living in the immediate household of the employee.

Sick leave benefits are intended solely to provide income protection in the event of illness or injury; unused sick leave benefits will not be paid to employees while they are employed or upon termination of employment.

Borrowing Unearned Sick Leave

Generally employees may not take sick leave in excess of hours available; however, in extreme circumstances, SIC allows the use of unearned sick leave with the following restrictions:

- ❖ SIC may allow year-round employees to borrow up to 10 days of unearned sick leave. SIC may request a health care provider's statement verifying the need for sick leave before approving the use of unearned leave.
- ❖ As sick leave is earned, the amount shall replace any sick leave advanced until all advanced time is replaced with earned time.

Time Off to Vote

SIC encourages employees to fulfill their civic responsibilities by participating in elections. Employees are encouraged to find time to vote either before or after their regular work schedule. However, if an employee is unable to vote in an election during nonworking hours

SIC will grant up to two hours of paid time-off to assist a year-round employee in fulfilling this civic obligation.

Employees should request time off to vote from their supervisors at least two working days prior to the Election Day.

Vacation Leave

Vacation time off with pay is available to eligible employees to provide opportunities for rest, relaxation, and personal pursuits. Regular year-round full and part-time staff are eligible for paid vacation time (time is pro-rated for part-time staff).

The amount of paid vacation time employees receive each year increases with the length of continuous employment as shown in the following schedule:

- ❖ Upon initial eligibility, an employee is entitled to earn up to 15 vacation days each year, accrued at a rate of 4.62 hours per bi-weekly pay period, beginning on January 1. The number of days to be earned will be prorated for the first year of employment, calculated from the hire date.
- ❖ After the fifth year of eligible service an employee is entitled to earn up to 20 vacation days each year, accrued at a rate of 6.15 hours per bi-weekly pay period, beginning on January 1.

The length of eligible service is calculated on the basis of the calendar year. This is the 12-month period that begins on January 1st and ends on December 31st.

The above assumes a full-time, year-round employee. Other eligible employees will earn paid vacation time on the same schedule, adjusted for the percentage of a full-time schedule worked per year

To take vacation, employees should request advance approval from their supervisors. Requests will be reviewed based on a number of factors, including business needs and staffing requirements. Certain employees, particularly those working full-time on Star Island during the conference season, may be restricted from using vacation leave during certain periods of their term of employment. Employees with such a restriction will be informed.

As stated above, employees are encouraged to use available paid vacation time for rest, relaxation, and personal pursuits. In the event that available vacation is not used by the end of the benefit year, employees may carry forward up to 10 days. Unused time over this carry over limit will be forfeited. All employees will be paid for unused vacation time that has been accrued but unused through their last day of work.

Borrowing Unearned Vacation Leave

SIC may allow the use of unearned vacation leave; however, no employee may borrow more than 50% of the vacation leave the employee is eligible to accrue for the year. As vacation leave is earned, the amount shall replace any vacation leave advanced until all advanced time is replaced with earned time.

Witness Duty Leave

SIC encourages employees to appear in court for witness duty when subpoenaed to do so. If employees have been subpoenaed or otherwise requested to testify as witnesses by SIC, full time employees will receive paid time off for the entire period of witness duty. Due to

the seasonal nature of SIC's business, seasonal staff are not eligible to receive paid witness duty leave.

Regular year-round full-time employees will be granted a maximum of 40 hours of paid time off to appear in court as a witness at the request of a party other than SIC. Year-round part-time employees are entitled to pro-rated witness duty leave. Employees will be paid at their base rates and are free to use any remaining paid leave benefits (such as vacation leave) to receive compensation for any period of witness duty absence that would otherwise be unpaid. An employee who is a defendant convicted in a criminal proceeding, or an employee who appears as an expert witness, is not eligible for paid leave.

The subpoena should be shown to the employee's supervisor immediately after it is received so that operating requirements can be adjusted, where necessary, to accommodate the employee's absence. The employee is expected to report for work whenever the court schedule permits.

Extended Leave Benefits

SIC offers several extended leave benefits that can be used independently or in conjunction with each other. A *medical leave* of absence is typically used for lengthier absences due to serious illness. If the serious illness is related to pregnancy or childbirth, the employee can use *pregnancy leave* and/or family leave. For the serious illness of a family member, such as a child, spouse, or parent, an employee can use *family leave*. *Family leave* can also be used for family obligations related to childbirth, adoption, or placement of a foster child.

When an employee combines the use of a type of leave, such as medical and family leave, the maximum length of the overall leave of absence is not combined. The maximum leave time for either leave benefit is 3 months whether it is used independently or in conjunction with another leave. The only exception to this is pregnancy leave; the maximum amount of leave under this benefit is equal to the length of time the employee is unable to work due to a disability that is related to pregnancy or childbirth. Specific information regarding each leave benefit follows.

Family Leave

Though SIC is not required to do so under the federal Family and Medical Leave Act, SIC provides family leaves of absence without pay to eligible employees who wish to take time off from work to fulfill family obligations relating directly to childbirth, adoption, or placement of a foster child, or to care for a child, spouse, or parent with a serious health condition. A serious health condition means an illness, injury, impairment, or physical or mental condition that involves in-patient care in a hospital, hospice, or residential medical care facility; or continuing treatment by a health care provider. Eligible female employees are also entitled to pregnancy leave; see below for further detail. Employees are required to make full use of available accrued sick leave and disability insurance, if applicable, before requesting unpaid family leave. Employees may elect to use accrued vacation time as well.

Eligible year-round employees may request family leave only after having completed six months of service. Eligible employees should make requests for family leave to their supervisors at least 30 days in advance of foreseeable events and as soon as possible for unforeseeable events.

Employees requesting family leave related to the serious health condition of a child, spouse, or parent may be required to submit a health care provider's statement verifying the need for a family leave to provide care, its beginning and expected ending dates, and the estimated time required.

Eligible employees may request up to a maximum of 3 months of family leave within any 12 month period. Any combination of family leave and medical leave may not exceed this maximum limit. If this initial period of absence proves insufficient, consideration will be given to a written request for a single extension of no more than 60 calendar days.

Employees who are members of the same family, and therefore may be impacted by the same event, are not required to combine their leave for any purposes; however, in order to minimize disruption to SIC's operations, employees from the same household may be asked to stagger their use of family leave, if feasible.

SIC will continue to provide health insurance to eligible employees for the length of the family leave. Subject to the terms, conditions, and limitations of the applicable plans, other insurance benefits will be provided by SIC until the end of the month in which the approved family leave begins. At that time, employees will become responsible for the full costs of these benefits if they wish coverage to continue. When the employee returns from family leave, benefits will again be provided by SIC according to the applicable plans.

Benefit accruals, such as vacation, sick leave, or holiday benefits, will be suspended during the leave and will resume upon return to active employment.

For scheduling purposes, an employee on family leave is requested to provide SIC with at least two weeks advance notice of the date the employee intends to return to work. When family leave ends, the employee will be reinstated to the same position, if it is available, or to an equivalent position for which the employee is qualified.

If an employee fails to return to work on the agreed upon return date, SIC will assume that the employee has resigned.

Medical Leave

Though SIC is not required to do so under the federal Family and Medical Leave Act, SIC provides medical leaves of absence without pay to eligible employees who are temporarily unable to work due to a serious health condition or disability. For purposes of this policy, serious health conditions or disabilities include continuing treatment by a health care provider such as inpatient care in a hospital, hospice, or residential medical care facility. Employees are required to make full use of available accrued sick leave and disability insurance, if applicable, before requesting unpaid medical leave. Employees may elect to use accrued vacation time as well.

Year-round employees may request medical leave only after having completed six months of employment. Exceptions to the service requirement will be considered to accommodate disabilities. Eligible employees should make requests for medical leave to their supervisors at least 30 days in advance of foreseeable events and as soon as possible for unforeseeable events.

A health care provider's statement must be submitted verifying the need for medical leave and its beginning and expected ending dates. Any changes in this information should be promptly reported to SIC. Employees returning from medical leave must submit a health care provider's verification of their fitness to return to work.

Eligible employees are normally granted leave for the period of the disability, up to a maximum of 3 months within any 12 month period. Any combination of medical leave and family leave may not exceed this maximum limit. If the initial period of approved absence proves insufficient, consideration will be given to a request for an extension.

Employees who sustain work-related injuries are eligible for a medical leave of absence for the period of disability in accordance with all applicable laws covering occupational disabilities.

SIC will continue to provide health insurance to eligible employees for the length of the medical leave. Subject to the terms, conditions, and limitations of the applicable plans, other insurance benefits will be provided by SIC until the end of the month in which the approved medical leave begins. At that time, employees will become responsible for the full costs of these benefits if they wish coverage to continue. When the employee returns from medical leave, benefits will again be provided by SIC according to the applicable plans.

Benefit accruals, such as vacation, sick leave, or holiday benefits, will be suspended during the leave and will resume upon return to active employment.

For scheduling purposes, an employee on medical leave is requested to provide SIC with at least two weeks advance notice of the date the employee intends to return to work. When a medical leave ends, the employee will be reinstated to the same position, if it is available, or to an equivalent position for which the employee is qualified.

If an employee fails to return to work on the agreed upon return date, SIC will assume that the employee has resigned.

Pregnancy Leave

In accordance with NH RSA 354-A:7 VI, if you become pregnant, you may request an unpaid leave of absence for the period during which you are unable to work specifically due to your pregnancy or the birth of your child. SIC's short-term disability plan provides paid benefits to pregnant women during a pregnancy leave of absence for up to 11 weeks. The length of pregnancy leave is determined by your ability to return to work.

A health care provider's statement may be required verifying the need for medical leave and its beginning and expected ending dates. Any changes in this information should be promptly reported to SIC. Employees returning from pregnancy must submit a health care provider's verification of their fitness to return to work.

The employee may combine the use of unpaid pregnancy leave with family leave and other accrued leave. The rules regarding family leave do not change; an employee can take up to 12 weeks of family leave to be at home for the birth of a new child. Pregnancy leave is used only for the time during the pregnancy or after the birth of the child for which the employee is unable to work due to a disability related to the pregnancy or childbirth. The maximum amount of pregnancy leave allowed is based on the length of time the mother is unable to work.

SIC will continue to provide health insurance to eligible employees for the length of the pregnancy leave up to a maximum of 12 weeks. The employee is responsible for paying Star for the employee portion of any voluntary benefits and should coordinate with the Human Resources Department to determine the method of payment. All other benefits (excluding paid time off, see below) will continue for up to 12 weeks. Benefit accruals, such as vacation, sick leave, or holiday benefits, will be suspended during the leave and will resume upon return to active employment.

So that an employee's return to work can be properly scheduled, an employee on pregnancy leave is requested to provide SIC with at least two weeks advance notice of the date the employee intends to return to work. When a pregnancy leave ends, the employee will be reinstated to the same position, if it is available, or to an equivalent position for which the employee is qualified.

If an employee fails to return to work on the agreed upon return date, SIC will assume that the employee has resigned.

Military Leave

A military leave of absence will be granted to eligible employees who are absent from work because of service in the U.S. Uniformed Services in accordance with the Uniformed Services Employment and Reemployment Rights Act (USERRA). Please contact the Human Resources Department to determine your eligibility to use military leave. Eligible seasonal staff are only eligible for military leave and its conditions during their employment term. Advance notice of military service is required, unless military necessity prevents such notice or it is otherwise impossible or unreasonable. The leave will be unpaid. However, employees may use any available paid time off for the absence.

Continuation of health insurance benefits is available as required by USERRA based on the length of the leave and subject to the terms, conditions and limitations of the applicable plans for which the employee is otherwise eligible.

Benefit accruals, such as vacation, sick leave, and holiday benefits, will be suspended during the leave and will resume upon the employee's return to active employment.

Employees on military leave for up to 30 days are required to return to work for the first regularly scheduled shift after the end of service, allowing reasonable travel time. Employees on longer military leave must apply for reinstatement in accordance with USERRA and all applicable state laws.

Employees returning from military leave will be placed in the position they would have attained had they remained continuously employed or a comparable one depending on the length of military service in accordance with USERRA. They will be treated as though they were continuously employed for purposes of determining benefits based on length of service.

Personal Leave of Absence

Personal Leave includes gaps in employment for seasonal staff who work nine months or more during the year. SIC provides leaves of absence without pay to eligible employees who wish to take time off from work duties to fulfill personal obligations. Eligible employees may request personal leave only after having completed one year of service. As soon as eligible employees become aware of the need for a personal leave of absence, they should request such leave from their supervisor.

Personal leave may be granted for a period of up to one month for every 24 months of service. If this initial period of absence proves insufficient, consideration will be given to a written request for a single extension to a total of no more than two months. With the supervisor's approval, an employee may take any available sick leave or vacation leave as part of the approved leave of absence.

Requests for personal leave will be evaluated based on a number of factors, including anticipated work load requirements and staffing considerations during the proposed period of absence.

Subject to the terms, conditions, and limitations of the applicable plans, health insurance benefits will be provided by SIC until the end of the month in which the approved personal leave begins. At that time, employees will become responsible for the full costs of these benefits if they wish coverage to continue. When the employee returns from personal leave, benefits will again be provided by SIC according to the applicable plans.

Benefit accruals, such as vacation, sick leave, or holiday benefits, will be suspended during the leave and will resume upon return to active employment.

When a personal leave ends, every reasonable effort will be made to return the employee to the same position, if it is available, or to a similar available position for which the employee is qualified. However, SIC cannot guarantee reinstatement in all cases. If an employee fails to report to work promptly at the expiration of the approved leave period, SIC will assume the employee has resigned.

In very few instances SIC, with Board approval, may provide leaves of absence with pay for long-term employees who wish to take time off from work duties to fulfill personal obligations. Requests for paid personal leave will be evaluated based on a number of factors, including but not limited to anticipated work load requirements and staffing considerations during the proposed period of absence. Subject to the terms, conditions, and limitations of the applicable plans, health insurance benefits will be provided by SIC and the employee's regular deductions for all benefits will continue to be deducted from the employee's paycheck. Benefit accruals for vacation and sick leave benefits will be suspended during the leave and will resume upon return to active employment. When a personal leave ends, every reasonable effort will be made to return the employee to the same position, if it is available, or to a similar available position for which the employee is qualified. However, SIC cannot guarantee reinstatement in all cases. If an employee fails to report to work promptly at the expiration of the approved leave period, SIC will assume the employee has resigned.

Extended Vacation Period (EVP) Policy

The purpose of this Extended Vacation Period Policy is to give long-term employees an additional benefit to thank them for years of service to Star Island. This benefit is intended to allow the employee to recharge, to foster a renewed commitment to SIC, enhance job performance after the extended break, and/or give the employee the opportunity to pursue another personal area of interest. Examples of extended vacation include travel, spending additional time with family, writing a book, and volunteering.

Employees shall be eligible for EVP after they have completed seven (7) years of continuous full-time service to Star Island. Year-round employees who are in good performance standing may request leave. All leave must be approved by the Chief Executive Officer, with the exception of an EVP request made by the Chief Executive Officer, which must be approved by the SIC Board.

The EVP will be no more than two months in length.

Employees, in consultation with the Chief Executive Officer (or the SIC Board, in the event the EVP request is made by the Chief Executive Officer), should select a period that is most compatible with their normal work cycle. For most positions this would be over the winter months, although other periods will be considered. The planning for taking an EVP should be done no later than six (6) months prior to the planned leave.

Employees are expected to utilize at least 50% of their available earned time during their EVP, including vacation days (50% of allotted vacation days for the calendar year during which the EVP will take place) and any holidays which occur during the EVP period. For EVP occurring early in the calendar year, a corresponding request for an advance of vacation time for the calendar year in question will be considered. Additionally, up to four (4) weeks of additional pay will be provided for an approved EVP. If the EVP requires more time off than the above allotments, the remaining time will be unpaid, unless the employee chooses to use any or all remaining vacation days beyond the 50% requirement noted above. If the EVP request results in the use of all available vacation days and there is still remaining time, the remaining time will be unpaid. All other employment relationships and related agreements remain in effect while on leave.

Health, retirement, and related benefits will continue as elected, and deductions will continue as usual, with the exception of unpaid leave, during which time the employee is still responsible for the employee share of health and dental coverage. Employees are requested not to schedule normal vacation time so near to an EVP period as to cause undue hardship on the remaining employees.

Vacation and sick time will not accrue while an employee is on EVP.

In no event will an employee be entitled to any payment for unused or forfeited EVP time, including upon termination of employment, with the exception of unused, regularly accrued vacation days that are not granted through the EVP request.

When a personal leave or EVP ends, every reasonable effort will be made to return the employee to the same position, if it is available, or to a similar available position for which the employee is qualified. However, SIC cannot guarantee reinstatement in all cases. If an employee fails to report to work promptly at the expiration of the approved leave period, SIC will assume the employee has resigned.

Work during the EVP will be strongly discouraged.

EVP is not intended to be an extension of the Family and Medical Leave Act, short-term disability/long-term disability and/or any other current benefit provided by the SIC. This policy does not constitute a guarantee of continued employment. Rather, employment with Star Island is and will continue to be on an “at will” basis. It is understood that all EVP requests are unique, and the Chief Executive Officer, or the SIC Board in the case of an EVP request from the Chief Executive Officer, has discretion to customize this policy to meet the needs of both the Star Island Corporation and each particular EVP request, and will approve requests based on several considerations including the hardship it may present to the organization.

ADDITIONAL BENEFITS

Benefits Continuation (See also Benefits Continuation under Leaving SIC)

The State of New Hampshire’s Benefit Continuation Plan gives eligible employees and their qualified beneficiaries the opportunity to continue health and dental insurance coverage under SIC’s benefit plans for up to 18 months when a “qualifying event” would normally result in the loss of eligibility. Some common qualifying events are resignation or termination of employment; a reduction in an employee’s hours or leave of absence; an employee’s divorce or legal separation; and a dependent child no longer meeting eligibility requirements.

Under this plan, the employee or beneficiary pays the full cost of coverage at SIC's group rates. SIC provides each eligible employee with a written notice describing rights granted under the NH plan when the employee becomes eligible for coverage under SIC's benefit plans. The notice contains important information about the employee's rights and obligations.

Employee Discounts

SIC offers all employees a 20% discount at retail locations that are owned and operated by SIC on Star Island: currently, only the snack bar. The gift store, lobby store, and book store are independently operated so there is no discount for employees unless offered by the ISAUU.

Professional Development

Training – SIC may require employees to attend job-related trainings and/or education classes that will support SIC's efforts to maintain and enhance the knowledge and skill level of its staff. Employees are encouraged to seek out trainings that will support their work. Registration and associated costs for trainings or educational events that an employee is required to attend will be reimbursed by SIC upon successful completion. Proposals for participating in such activities should be submitted for inclusion in the organization's operating budget.

Education Assistance – SIC recognizes that the skills and knowledge of its employees are critical to the success of the organization. The educational assistance program encourages personal development for employees who are voluntarily seeking formal education so that they can maintain and improve job-related skills or enhance their ability to compete for reasonably attainable jobs within SIC.

SIC will provide educational assistance to all year-round employees who have completed one year of employment. To maintain eligibility, employees must remain on the active payroll and be performing their job satisfactorily throughout the completion of each course.

SIC will provide financial reimbursement of up to 50% of the cost of tuition per course but no more than \$750 per year or as funding allows. Generally, SIC can assist employees with only one course per semester, assuming no more than two semesters per year. Employees requesting educational assistance should submit their request for inclusion in the organization's operating budget.

Individual courses or courses that are part of a degree, licensing, or certification program must be related to the employee's current job duties or a foreseeable-future position in the organization in order to be eligible for educational assistance. SIC has the sole discretion to determine whether a course is related to an employee's current job duties or a foreseeable-future position.

While educational assistance is expected to enhance employees' performance and professional abilities, SIC cannot guarantee that participation in formal education will entitle the employee to automatic advancement, a different job assignment, or pay increases.

Relocation

In exceptional cases and at its discretion, SIC may pay for certain costs directly related to relocation when providing a moving allowance is necessary for an individual to accept employment with the corporation. Moving allowances must be negotiated at the time of offering a position.

APPENDICES

Handbook Acknowledgement Page

The Personnel Handbook contains important information about Star Island Corporation (SIC) and I understand that I should consult the Human Resources Department regarding any questions I may have that are not answered in the handbook. I have entered into my employment relationship with SIC voluntarily, and understand that there is no specified length of employment. Accordingly, either SIC or I can terminate the relationship at will, at any time, with or without cause, and with or without advance notice.

Since the information, policies, and benefits described herein are subject to change at any time, I acknowledge that revisions to the handbook may occur at the sole discretion of SIC. All such changes will generally be communicated through official notices, and I understand that revised information may supersede, modify, or eliminate existing policies. Only the Chief Executive Officer of SIC has the ability to adopt any revisions to the policies in this handbook.

Furthermore, I understand that this handbook is neither a contract of employment nor a legally-binding agreement. I understand that I am expected to read the entire handbook and have done so; I also understand that I may ask the Human Resources Department any questions I might have concerning the handbook. I accept the terms of the handbook and also understand that it is my responsibility to comply with the policies contained, including all alcohol and drug related policies, and other policies designed to ensure my safety and the safety of other SIC employees and SIC guests.

I have received a copy of the SIC's Personnel Handbook on the date listed below and or have been advised of its location on the SIC website. Additionally, I will sign this Acknowledgment of Receipt and return it to the Human Resources Department, via the SIC Office Manager, on the date specified. I understand that this form will be retained in my personnel file.

Signature of Employee

Date

Name of Employee - Printed

VERSION: 2020 Personnel Handbook

Reference Waiver

Employee's Name (Please Print): _____

I acknowledge that I have been informed that it is the Star Island Corporation's general policy to disclose in response to a prospective employer's written request only the following information about current or former employees: (1) the dates of employment, (2) position, and (3) salary information.

By signing this release, I am voluntarily requesting that the Star Island Corporation depart from this general policy in responding to reference requests from any prospective employer that may be considering me for employment. I authorize the Star Island Corporation to disclose to such prospective employers any job performance information, including my reason(s) for leaving.

In exchange for the Star Island Corporation's agreement to depart from its general policy and to disclose additional employment-related information pursuant to my request, I agree to release and discharge the Star Island Corporation employees, officers, and directors for all claims, liabilities, and causes of action, known or unknown, fixed or contingent, that arise from or that are in any manner connected to the Star Island Corporation's disclosure of employment-related information to prospective employers. This release includes, but is not limited to claims of defamation, libel, slander, negligence, or interference with contract or profession.

I acknowledge that I have carefully read and fully understand the provisions of this release and that I have decided to sign this release voluntarily and without coercion or duress by any person.

This release sets forth the entire agreement between the Star Island Corporation and me, and I acknowledge that I have not relied upon any representation or statement, written or oral, not set forth in this document.

A photocopy or fax of this authorization shall be as valid as the original.

Signature _____

Date _____

Star Island Contact Information

Following is contact information for key Star Island employees that can answer questions or respond to comments regarding the Personnel Handbook.

Saleha Walsh
HR Consultant
swalsh@Insourceservices.com

Kate Brady
Office Manager
kbrady@starisland.org

John Bynum
Grievance Officer
jbynum@starisland.org

Justina Maji
Alternate Grievance Officer
jmaji@starisland.org

Joe Watts
Chief Executive Officer
jwatts@starisland.org

STAR ISLAND CORPORATION

Safe Community Policy

Policy Statement

Star Island Corporation (SIC) recognizes that violence and physical abuse are realities in our society. This policy is intended to provide a responsible means of addressing this issue, and to reflect our commitment to work toward a safe community for all guests (minors and adults), including but not limited to conferees, conference and staff overnight guests, personal retreaters, and day visitors/boaters, as well as staff, contractors and volunteers visiting and/or working on Star Island or off island for Star Island business.

To achieve these goals we will:

- Conduct background checks of SIC staff and volunteers who work with children.
- Implement supporting policies including harassment, discrimination, and child abuse prevention (hereafter referred to as “Supporting Policies”).
- Emphasize the importance of this Policy and Supporting Policies with conference leadership, including strongly recommending that each conference adapt and implement this Policy and Supporting Policies as its conference policies.
- Require conferences which offer youth programming to conduct sex offender registry information (SORI) checks on all volunteers or employees working with minors, and to attest, in writing, that they have done so. Strongly recommend that conferences which offer youth programming conduct criminal background checks on all volunteers or employees working with minors.
- Provide a specific process by which allegations of abuse are reported to the appropriate senior SIC staff person for initial inquiry and, when abuse is suspected, reported to appropriate agencies pursuant to state law.
- Treat all persons with dignity and respect.
- Make the community aware of this Policy and Supporting Policies through publication (on our web site, Program Catalog and Better Living on Star Island), through conference leadership, and by inclusion in the Personnel Handbook.

While much of this Policy and the Supporting Policies focus upon those directly working with children and youth, all members of Star Island are responsible to work toward a safe and caring community in which all individuals:

- Are respected and their self worth affirmed,
- Are encouraged in their spiritual, social, and intellectual growth.

We will stress in our actions the care of all individuals, safety for our volunteers and staff, and the principles of fairness, kindness and forgiveness that have long been part of our tradition.

Policy Scope

1.1.SIC Business Related Activities

1.1.1.Location

This policy applies to all SIC business related activities either held at Star Island or off site including virtual events on the internet.

1.1.2.Activities

This policy applies to the entire Star Island Community as defined in 1.2. in the course of performing SIC business related activities.

1.2.Star Island Community

This policy applies to all constituency groups, including:

1.2.1 Guests

In this document, “guests” shall mean anyone visiting Star Island, or its offices, including but not limited to conferees, conference and staff overnight guests, personal retreaters, and day visitors/boaters.

1.2.2 Staff

In this document, “staff” shall mean anyone employed by SIC.

1.2.3 Volunteers

In this document, “volunteers” shall mean anyone then enrolled by SIC as a service volunteer.

1.2.4 Contractors

In this document, “contractors” shall mean anyone then under contract with SIC, including consultants.

1.2.5 Minors

In this document, “minor” and “minors” shall mean anyone less than 18 years of age.

1.3.Protective Care of Minors

This Policy considers the necessary precautions and procedures for the overall protective care of minors. It details policies under which SIC volunteers or staff shall have Access to Minors and all polices under which SIC volunteers or staff may Supervise Minors.

1.3.1 Access to Minors

Staff and volunteers who have access to privileged information or work with families or minors in the course of SIC business related activities are considered to have Access to Minors. Except in cases where no screened individuals are available and adult access to minors is necessary, such access should be limited to individuals for whom background checks have been conducted according to the policies outlined below.

1.3.2 Supervision of Minors

For SIC business related activities where parents or guardians are not present and it is explicitly understood that minors are in the care of volunteers or staff, said volunteers or staff are considered to be Supervising Minors. Except in cases where no screened individuals are available and access to minors is necessary, such a responsibility should be limited to individuals for whom background checks have been conducted according to the policies outlined below.

1.4. Protective Care of Community Members

This policy considers the necessary precautions and procedures for the overall protective care of community members. It addresses circumstances under which various parts of our constituencies may assist community members in need, including, but not limited to, elders requiring personal care attendants.

Policy Administration

This Policy is in effect year-round. Due to the potential disclosure of confidential information in connection with the administration of this Policy and Supporting Policies, responsibility for such administration must lie with a senior member of SIC's staff. This Policy and Supporting Policies presume and make reference to a Grievance Officer. Broadly, the Grievance Officer is responsible to manage and oversee the application of the Supporting Policies below and where noted perform specific tasks required by these policies.

The Chief Executive Officer will annually designate themselves or appoint a senior staff person of the Star Island Corporation as the Grievance Officer.

Policy APPROVED by SIC Board of Directors on January 21, 2020 (replaces previous versions)

Policy and Procedure Addressing Discrimination and Sexual and Other Harassment

Note: *This policy will be distributed and reviewed at both a meeting of the Board of Directors and a year-round staff meeting during the first quarter of each calendar year. Through the Personnel Handbook, it will be distributed to and reviewed with all new staff at the time of hire. It will be included in new Board member briefing materials. It will be publicized on our web site, in our Program Catalog, and in Better Living on Star Island, as well as through conference leadership.*

Preface: The SIC shall at all times endeavor to maintain an environment in which all persons are free from sexual or other harassment. All persons associated with the Star Island Corporation, including, but not necessarily limited to, the employees (Pelicans and other staff), the administration, contractors, consultants, volunteer workers and conferees, are expected to conduct themselves at all times so as to provide an atmosphere free from discrimination and harassment. Discrimination and sexual and other harassment will not be tolerated. Any person who engages in these behaviors while a member of the Star Island community will be in violation of this policy. Further, retaliation against an individual for filing a complaint or assisting in an investigation pursuant to this policy is unlawful and will not be tolerated.

1. Harassment refers to unreasonable conduct or behavior, which is personally offensive or threatening, impairs morale, or interferes with the work effectiveness of employees and relates to *race, color, religion, sex, gender identity, age, marital status, sexual orientation, genetic information, veteran status, physical or mental disability, national origin, or ancestry* or other protected category. Examples of harassment include conduct or comments that threaten physical violence; offensive, unsolicited remarks; unwelcome gestures or physical contact, display or circulation of written materials, items or pictures degrading to any members of the above-mentioned group; and/or verbal abuse or insults about or directed at any individual because of their relationship in any of the groups listed above which has the purpose or effect of unnecessarily interfering with an individual's employment or participation in retreat, educational or other activities or creating an intimidating, hostile or offensive environment. Sexual harassment is defined as unwelcome sexual advances; requests for sexual favors, or other verbal or physical conduct of a sexual nature, where:
 - 1.1. Submission to such conduct is made either explicitly or implicitly a term or condition of a person's employment or participation in retreat, educational or other activities sponsored or hosted by the SIC.
 - 1.2. Submission to, or rejection of such conduct by an individual is used as the basis for decisions affecting employment or participation in retreat, educational or other activities.
 - 1.3. Such conduct has the purpose or effect of unreasonably interfering with an individual's work or participation in SIC activities or creating an intimidating, hostile or offensive working, educational or retreat environment.
 - 1.4. The following unwelcome conduct may also constitute sexual harassment, whether intended or not:
 - 1.4.1. use of sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's own or another's sex life, comments on an individual's body, comments about an individual's sexual activity, deficiencies or prowess;
 - 1.4.2. displaying sexually suggestive objects, printed materials, pictures or cartoons;

1.4.3. unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments;

1.4.4. inquiries into one's sexual experience; and

1.4.5 discussion of one's sexual activities.

2. The Grievance Officer: The Chief Executive Officer will annually designate himself or appoint a senior staff person of the Star Island Corporation as the Grievance Officer who will be vested with the authority and responsibility of processing all discrimination and harassment complaints. Alternate Grievance Officer(s) may also be designated. In the event the complaint is against the Grievance Officer when not the Chief Executive Officer, the complaint will be heard by the Chief Executive Officer. In the event the complaint is against the Chief Executive Officer, the complaint shall be heard by the President of the SIC Board of Directors or their designee.

2.1. Any member of the Star Island community who believes that they have been subjected to discrimination or harassment should report the incident(s) to the Grievance Officer.* A parent, guardian or any person who believes that a child has been subjected to harassment of any kind must file a complaint on behalf of the child. Anyone (employees, conferees, etc.) can raise concerns and make reports of discrimination or harassment without fear of reprisal.

Any employee who becomes aware of possible discrimination or harassment must promptly advise the Grievance Officer who will handle the matter in a timely and confidential manner, to the greatest extent possible.

2.2. When a complaint is made, the following process will be used to reach a disposition which balances the interests of all parties with the primary goal of protecting the safety of all while on Star Island, in the SIC office, or doing the business of the Star Island Corporation. If the Grievance Officer or the Chief Executive Officer believes the circumstances require investigation by an independent outside investigator, they may delegate the responsibility for investigation to such an individual, provided they inform the Board President or, when they are unavailable, the Board Vice President.

The Grievance Officer will investigate the matter through the following process:

2.2.1. When the aggrieved is a minor and there is an allegation of child abuse, the Grievance Officer will guide the reporting party through the process of making an oral report of the child abuse or the Grievance Officer will themselves make such report to the Bureau of Children, Division for Children, Youth, and Families, Department of Health and Human Services in accordance with NHRSA 169-C:29 which states "any...person having reason to suspect that a child has been abused or neglected shall report the same..." and NHRSA 169-C:30 which states "An oral report shall be made immediately by telephone or otherwise, and followed within 48 hours by a report in writing, if so requested, to the bureau."

2.2.2. When the aggrieved is an adult, the Grievance Officer will confer with the charging party in order to obtain a clear understanding of that party's statement of the facts.

2.2.3. The Grievance officer will then meet with the charged party in order to obtain their response to the complaint.

2.2.4. The Grievance Officer will use their discretion in determining whether there are witnesses who should be interviewed and to conduct said interviews for the purpose of gathering facts and reaching a conclusion

2.2.5. Privacy and confidentiality: In the course of taking any action, the Grievance Officer shall maintain the highest degree of privacy and confidentiality as possible under the circumstances.

2.2.6. The Grievance Officer will keep a written record of information gathered throughout the process of resolving the complaint, and shall complete a written record of their findings.

2.2.7. The Grievance Officer, if someone other than the Chief Executive Officer shall provide a written record of findings to the Chief Executive Officer, or, if appropriate, the President of the Board of Directors.

2.3. After reviewing the record, the Grievance Officer will decide the next appropriate action. The Grievance Officer may gather additional information as deemed necessary to resolve the matter formally or informally. With the consent of the reporting party, the Grievance Officer may mediate a resolution between or among the parties.

Thereafter the Grievance Officer, in consultation with the Chief Executive Officer, shall impose any sanctions deemed appropriate. If a staff member is found to have violated this policy, the Grievance Officer may, without limitation, impose a warning, suspension or termination.

If a volunteer or guest is found to have engaged in conduct or activities contrary to this policy, Grievance Officer may, in consultation with the Chief Executive Officer, impose any sanctions deemed appropriate, including but not limited to, barring that person from further involvement with the Star Island Corporation and/or being present on the island, either permanently or for a period of time.

3. Retaliation: Retaliation is any form of intimidation, reprisal, or harassment directed against a person who reports discrimination or harassment or provides information during an investigation of such behavior, or witnesses or has reliable information about such behavior.
 4. Retaliation against any person who has filed a complaint of discrimination or harassment or cooperated in an investigation regarding a complaint for discrimination or harassment is unlawful and will not be tolerated.
 5. Policy Dissemination: In accordance with the law, this policy shall be given to all new staff upon appointment via the Personnel Handbook and shall be distributed annually to all staff and conference chairs/leaders for communication to conferees.
 6. Annual Review: This policy shall be reviewed annually by the SIC Board of Directors.
 7. Copies of this policy shall be referenced on our web site, in our Program Catalog, and in Better Living on Star Island; included in the Personnel Handbook; and promoted through conference leadership.
- * The CEO has appointed the Island Manager as the Sexual Harassment Grievance Officer, and the Back-up Island Manager as the Alternate Grievance Officer. The Grievance Officer or Alternates may be reached through SIC's Portsmouth Office (telephone: 603-430-6272; email: office@starisland.org; mail: 30 Middle Street, Portsmouth, NH 03801).

Policy APPROVED by SIC Board of Directors on January 21, 2020 (replaces previous versions)

Policy and Procedure Addressing Child Abuse

Note: *This policy will be distributed and reviewed at both a meeting of the Board of Directors and a year-round staff meeting during the first quarter of each calendar year. Through the Personnel Handbook, it will be distributed to and reviewed with all new staff at the time of hire. It will be included in new Board member briefing materials. It will be publicized on our web site, in our Program Catalog, and in Better Living on Star Island, as well as through conference leadership.*

Preface: The SIC shall endeavor at all times to maintain an environment in which all children are free from child abuse. All persons associated with the Star Island Corporation, including, but not necessarily limited to, the employees (Pelicans and other staff), the administration, contractors, consultants, volunteer workers and conferees, are expected to conduct themselves at all times so as to provide a safe and nurturing atmosphere for children and adolescents. Child abuse is unlawful and will not be tolerated. Any person who engages in behaviors that are defined as child abuse while acting as a member of the Star Island community will be in violation of this policy as held by state and federal laws. Further, retaliation against an individual for filing a complaint or assisting in the initial inquiry pursuant to this policy is unlawful and will not be tolerated.

1. Child abuse shall be defined as in NH RSA 169-C: 3, the New Hampshire Child Protection Act, II and XXVII. [Title 12, Chapter 169-C, New Hampshire Revised States]:

“ ‘Abused child’ means any child who has been:

- (a) Sexually abused; or
- (b) Intentionally physically injured; or
- (c) Psychologically injured so that said child exhibits symptoms of emotional problems generally recognized to result from consistent mistreatment or neglect; or
- (d) Physically injured by other than accidental means.”

“ ‘Sexual abuse’ means the following activities under circumstances which indicate that the child’s health or welfare is harmed or threatened with harm: the employment, use, persuasion, inducement, enticement, or coercion of any child to engage in, or having a child assist any other person to engage in, any sexually explicit conduct or any simulation of such conduct for the purpose of producing any visual depiction of such conduct; or the rape, molestation, prostitution, or other form of sexual exploitation of children, or incest with children. With respect to the definition of sexual abuse, the term ‘child’ or ‘children’ means any individual who is under the age of 18 years.”

- 1.1. NH law defines a child as any person who has not reached their eighteenth birthday [Chapter 169-C: 3]

- 1.2. Under NH law not only professional care givers of children but also “.. any other person having reason to suspect that a child has been abused or neglected shall report the same...” [Chapter 169-C: 29]

1.2.1. Responsibilities: As care providers and the host of care providers for children, the staff and volunteers of the SIC have a very serious responsibility for the health and well being of children. If any staff member or volunteer suspects that a child has been or is in danger of being abused, it is their responsibility to immediately discuss concerns with the Grievance Officer. This applies if the abuse appears to come from another child, from a parent, guardian or other person responsible for the welfare of the child while on Star Island,

or from any person not responsible for the welfare of the child. If the Grievance Officer is not available, the staff member or volunteer shall contact the Alternate Grievance Officer.

1.2.2. Discipline: Staff members and volunteers shall never discipline a child by the use of any physical method including shaking, spanking and slapping. Verbal reprimands shall be calm, yet firm, and shall not include destructive criticism. If a child is disruptive, a parent, guardian or other person responsible for the welfare of the child while on Star Island shall be informed immediately.

1.2.3. Reporting: Any person on Star Island who suspects physical or sexual abuse of a child must report it immediately to the Grievance Officer and/or the Alternate Grievance Officer **and, by law,** the Bureau of Children, Division for Children, Youth, and Families, Department of Health and Human Services in accordance with NHRSA 169-C:29. When the child suspected of being the victim of physical or sexual abuse is a conference guest, the Grievance Officer shall determine if the circumstances merit informing the conference leadership of the suspected abuse.

2. The Grievance Officer: The Chief Executive Officer will annually designate himself or appoint a senior staff person of the Star Island Corporation as the Child Abuse Grievance Officer who will be vested with the authority and responsibility of processing all child abuse complaints. In the event the complaint is against the Grievance Officer when not the Chief Executive Officer, the complaint will be heard by the Chief Executive Officer. In the event the complaint is against the Chief Executive Officer, the complaint shall be heard by the President of the SIC Board of Directors or their designee.

2.1. Anybody on Star Island who believes that a child or adolescent has been subjected to child abuse must report the incident(s) to the Grievance Officer* and file a report on behalf of the child with the Bureau of Children, Division for Children, Youth, and Families, Department of Health and Human Services in accordance with NHRSA 169-C:29. The Grievance Officer may consult on whether reporting is required and/or assist the reporting party in filing such a report (as per 2.2.1.). If the Grievance Officer suspects that the reporting party is unwilling or unable to file the oral report, the Grievance Officer will file such report. Anyone (employees, volunteers, conferees, etc.) can raise concerns and make reports without fear of reprisal.

Any employee, supervisor, staff or other person who becomes aware of possible child abuse shall promptly advise the Grievance Officer who will handle the matter in a timely and confidential manner.

The following process will be used to protect the safety of all while on Star Island, at the SIC office or doing the business of the Star Island Corporation when a charge is made. At the same time, state reporting requirements and using the child protection services of the State of New Hampshire will be complied with so that the child in question is subjected to the least amount of interviewing or other interventions as possible.

- 2.2 The Grievance Officer will ensure an initial inquiry is conducted according to the following process:

2.2.1 The Grievance Officer will guide the reporting party through the process of making an oral report of the child abuse, and the Grievance Officer will offer to assist the reporting

party in filing such report to the Bureau of Children, Division for Children, Youth, and Families, Department of Health and Human Services in accordance with NHRSA 169-C:29 which states **“any...person having reason to suspect that a child has been abused or neglected shall report the same...”**; and NHRSA 169-C:30 states “An oral report shall be made immediately by telephone or otherwise, and followed within 48 hours by a report in writing, if so requested, to the bureau.” If the Grievance Officer suspects that the reporting party is unwilling or unable to file the oral report, the Grievance Officer will file such report.

2.2.2 The Grievance Officer will take actions that are reasonably necessary to ensure the child's safety and they will guard against subjecting the child to multiple interviews.

2.2.3 Privacy and confidentiality: In the course of taking any action, the greatest degree of privacy and confidentiality possible under the circumstances shall be maintained.

2.3 The Grievance Officer may gather additional information as deemed necessary to protect the welfare of the child and ensure their safety and that of other children and adults. The Grievance Officer shall impose any sanctions deemed appropriate. If a staff member is found to have engaged in conduct or activities contrary to this policy, the Grievance Officer may, in consultation with the Chief Executive Officer, impose a warning, suspension or termination. If a volunteer or guest is found to have engaged in conduct or activities contrary to this policy, the Grievance Officer, in consultation with the Chief Executive Officer may, in their discretion, impose any sanctions deemed appropriate, including but not limited to, barring that person from further involvement with the Star Island Corporation and/or being present on the island, either permanently or for a period of time.

3. Retaliation: Retaliation is any form of intimidation, reprisal, or harassment directed against a person who reports discrimination or harassment or provides information during an investigation of such behavior, or witnesses or has reliable information about such behavior
4. Retaliation against any person who has filed a complaint of child abuse or cooperated in an initial inquiry or investigation regarding a complaint of child abuse is unlawful and will not be tolerated.
5. Policy Dissemination: In accordance with the law, this policy shall be given to all new staff upon appointment via the Personnel Handbook and shall be distributed annually to all staff and conference chairs/leaders for communication to conferees.
6. Annual Review: This policy shall be reviewed annually by the SIC Board of Directors.
7. Copies of this policy shall be referenced on our web site, in our Program Catalog, and in Better Living on Star Island, included in the Personnel Handbook, and promoted through conference leadership.

* The CEO has appointed the Island Manager as the Child Abuse Grievance Officer, and the Back-up Island Manager as the Alternate Grievance Officer. The Grievance Officer or Alternates may be reached through SIC's Portsmouth Office (telephone: 603-430-6272; email: office@starisland.org; mail: 30 Middle Street, Portsmouth, NH 03801).

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