

# **Jesuit Worldwide Learning/USA**

## **EMPLOYEE HANDBOOK OF PERSONNEL POLICIES**

**Effective March 1, 2020**

### ***MISSION STATEMENT***

The mission of Jesuit Worldwide Learning/USA (“JWL/USA”) is to accompany, serve, and advocate for the rights of refugees and forcibly displaced people. Our mission serves to constantly remind us of our priorities and the type of work we undertake.

This Employee Handbook of Personnel Policies (hereinafter referred to as the “Handbook”) is designed to acquaint you with JWL/USA and to provide you with information about working conditions, employee benefits, and some of the policies affecting your employment. You should read, understand, and comply with all provisions of the Handbook. It describes many of your responsibilities as an employee and outlines the programs developed by JWL/USA to benefit you as an employee. One of our objectives is to provide a work environment that is conducive to both personal and professional growth.

While every attempt has been made to create these personalized policies consistent with federal and state law, if an inconsistency arises, the policy(ies) will be enforced consistent with the respective applicable law. These personnel policies supersede any and all existing JWL/USA policies and practices in effect prior to the effective date of this Handbook and may not be amended or added to without the express written approval of JWL/USA. No handbook can anticipate every circumstance or question about policy. As JWL/USA continues to grow, the need may arise and JWL/USA reserves, from time to time, the right to revise, supplement, or rescind any policies or portion of the Handbook as it deems appropriate at its sole and absolute discretion. Employees will be notified of such changes to the Handbook as they occur.

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**1. Part One**

**1. INTRODUCTION**

Welcome to JWL/USA. In joining Jesuit Worldwide Learning USA, an international Catholic organization, you become part of a national network of the Jesuits around the world. As a 503(c)(3) not-for-profit entity in the state of Washington, JWL/USA was founded by in 2010, and has since provided access to higher education to those at living at the margins of our society around the world.

The term “JWL/USA,” as used throughout this Handbook refers exclusively to JWL/USA as your employer who is primarily responsible for directing your day-to-day duties. The terms "we," "us," and "our" refer to JWL/USA and not to any other third-party entity that provides employee services for JWL/USA, unless otherwise stated.

Please read the policies carefully and keep them in a convenient place for easy reference. Please discuss any unclear items contained in this Handbook with your supervisor or the US Operations Director or Human Resources Director.

**2. WORKPLACE POLICIES**

This Handbook contains information about the employment policies and practices of JWL/USA. We expect each employee to read this Handbook carefully, since it is a valuable reference for understanding your job and JWL/USA. The policies outlined in this Handbook should be regarded as management guidelines only, which in a developing business, will require changes from time-to-time. JWL/USA retains the right to make decisions involving employment as needed in order to conduct its work in a manner that is beneficial to the employees and JWL/USA. This Handbook supersedes and replaces any and all prior handbooks and any and all prior, inconsistent verbal or written policy statements. Except for the policy of at-will employment, which can be changed only by the JWL/USA Board, JWL/USA reserves the right to revise, delete, and add to the provisions of this Handbook at any time without further notice. All such revisions, deletions, or additions must be in writing and must be signed by the US Operation Director of JWL/USA. No oral statements or representations can change the provisions of this Handbook.

**Policies set forth in this Handbook are for your information and guidance only. It is not intended to create, nor shall it be construed as creating, a contractual obligation of any kind or a contract of employment between JWL/USA and any of its employees. The provisions of the Handbook are not a guarantee of future benefits nor are they intended to alter the employment-at-will relationship in any way.**

Nothing in this Handbook is intended to unlawfully restrict an employee's right to engage in any of the rights guaranteed by Section 7 of the National Labor

Relations Act, including, but not limited to, the right to engage in concerted protected activity for the purposes of mutual aid and/or protection. Nothing in this Handbook will be interpreted, applied or enforced to interfere with, restrain, or coerce employees in the exercise of Section 7 rights.

JWL/USA is an at-will employer. This means that regardless of any provision in this Handbook, either you or JWL/USA may terminate the employment relationship at any time, for any reason, with or without cause or notice. Nothing in this Handbook or in any document or statement, written or oral, shall limit the right to terminate employment-at-will. No Director, employee, or representative of JWL/USA is authorized to enter into an agreement—express or implied—with an employee for employment for a specified period of time unless such an agreement is a written contract signed by the JWL/USA Board (or the representatives the Board appoints—usually the US Operation Director or Human Resources Director).

When this Handbook refers to current benefit plans maintained by JWL/USA and/or its third-party employment services provider (ADP (“ADP”)), please refer to the actual plan documents and summary plan descriptions if you have specific questions regarding the benefit plans. Those documents are controlling. Please note that ADP is not bound by the terms of any contract between an employee and JWL/USA, unless it is executed by the President of ADP.

While preserving its discretion to act, JWL/USA commits itself to recognize the dignity of each employee by providing employees with reasonable expectations of their job duties, the performance criteria used by JWL/USA to evaluate work, and periodic reviews and fairness when disciplinary action may be necessary.

The personnel practices of JWL/USA reflected in this Handbook aim to create within the organization a healthy atmosphere conducive to good work habits, to uphold the dignity of each employee, and to recognize individual abilities and talents in order to best utilize the employee’s expertise.

As part of your orientation, you are asked to read the Handbook to familiarize yourself with the policies that serve as a basis for your work for JWL/USA, and to sign and return the acknowledgement enclosed herein.

### **3. PERSONNEL DEFINITION**

JWL/USA recognizes the following categories of personnel:

1. JWL/USA executives/department directors, administrators, and specialists, all of whom are employees of JWL/USA
2. Support staff who may be full-time, part-time or temporary, all of whom are JWL/USA employees

Jesuits and other vowed religious men and women who volunteer to provide services associated with JWL/USA, as well as unpaid interns, are not considered employees of JWL/USA.

## **Part Two**

### **1. EMPLOYMENT OVERVIEW**

#### **A. Statement on Equal Employment Opportunity**

JWL/USA is an equal opportunity employer. JWL/USA does not discriminate against any person because of race, color, creed, religion, sex, national origin, disability, age, sexual orientation, or any other characteristic protected by law (referred to as "protected status"). This nondiscrimination policy extends to all terms, conditions, and privileges of employment; as well as the use of all facilities; participation in all JWL/USA-sponsored activities; and all employment actions, such as promotions, compensation, benefits, and termination of employment. There may be instances where a bona fide occupational qualification is reasonably necessary for the normal operations of JWL/USA (such as a religious denomination qualification).

Any employees with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their immediate supervisor or the Human Resources Director. Employees can raise concerns and make reports without fear of reprisal. Anyone found to be engaging in any type of unlawful discrimination will be subject to disciplinary action, up to and including discharge of employment.

#### **B. Statement on Religious Accommodation**

JWL/USA complies with Title VII of the Civil Rights Act of 1964, and all applicable state and local fair employment practices laws, and is committed to providing equal employment opportunities to all individuals, regardless of their religious beliefs and practices or lack thereof. Consistent with this commitment, JWL/USA will provide a reasonable accommodation of an applicant's or employee's sincerely held religious beliefs if the accommodation would resolve a conflict between the individual's religious beliefs or practices and a work requirement, unless doing so would create an undue hardship for JWL/USA.

If you believe you need an accommodation because of your religious beliefs or practices or lack thereof, you are responsible for requesting an accommodation from your immediate supervisor or the US Operation Director. JWL/USA encourages employees to make their requests in writing. After receiving your request, JWL/USA will engage in a dialogue with you to explore potential accommodations that could resolve the conflict between your religious beliefs and practices and one or more of your work requirements. JWL/USA encourages you to suggest specific reasonable accommodations that you believe would resolve any such conflict. However, JWL/USA is not required to make the specific accommodation requested by you and may provide an alternative, effective accommodation, to the extent that any accommodation can be made without imposing an undue hardship on JWL/USA.

JWL/USA makes determinations about religious accommodations on a case-by-case basis considering various factors and based on an individualized assessment in each situation. Individuals will not be retaliated against for requesting an accommodation in good faith.

**C. Statement on the Americans with Disabilities Act**

We are committed to providing equal employment opportunities to qualified individuals with disabilities. This may include providing reasonable accommodation where appropriate in order for an otherwise qualified individual to perform the essential functions of the job. It is your responsibility to notify your supervisor of the need for an accommodation. Upon doing so, your supervisor may ask you for your input or the type of accommodation you believe may be necessary or the functional limitations caused by your disability. Also, when appropriate, we may need your permission to obtain additional information from your physician, or other medical, or rehabilitation professionals. JWL/USA will not seek genetic information in connection with requests for accommodation. All medical information received by JWL/USA in connection with a request for accommodation will be treated as confidential.

**D. Employment by a Religious Organization**

In accepting employment at JWL/USA each employee acknowledges that he or she is employed by a Roman Catholic organization providing services to support the mission of Jesuit Worldwide Learning/USA. As such each employee's public actions should not contradict Catholic doctrine or morality, nor shall an employee engage in any activity that may nullify or gravely impede the aims or objectives of JWL/USA; such public activity may lead to dismissal. JWL/USA reserves the right to dismiss or otherwise discipline an employee for such public activity.

**E. Non-Harassment Policy**

It is our policy not to tolerate harassment of any personnel including, but not limited to, race, color, religion, sex, age, disability, sexual orientation, national origin or citizenship. While it is not easy to define precisely what harassment is, it includes: slurs, epithets, threats, derogatory comments, hostility, visual depictions, unwelcome jokes, and teasing. The purpose of this policy is to ensure that, in the workplace, no employee harasses another on any of these bases. This policy applies to all incidents of harassment, including those that occur off-premises or after-hours, where the offender is a supervisor, co-worker, or even a non-employee with whom the employee is involved directly or indirectly, in a business or potential business relationship.

The purpose of this policy is to ensure that in the workplace, no employee is harassed or harasses another for any reason or in any manner. The conduct prohibited by this policy includes conduct in any form including but not limited to e-mail, voice mail, chat rooms, Internet use or history, text messages, pictures, images, writings, words, or gestures.

Sexual harassment is defined broadly as unwelcome sexual advances, requests for sexual favors and/or verbal or physical conduct of a sexual nature including, but not limited to, sexually-related drawings, pictures, jokes, teasing, e-mails, text messages, uninvited touching, or other sexually-related comments which creates a hostile work environment based on sex or gender. In accordance with JWL/USA's policy prohibiting sexual harassment, all individuals shall refrain from engaging in any of the activities described in this paragraph. Harassment of JWL/USA employees by third parties is also prohibited. In addition, no individual shall threaten or insinuate that another employee's or job applicant's refusal to submit to sexual advances will adversely affect that person's employment, work, status, evaluation, wages, or any other condition of employment. Similarly, no individual shall promise, imply or grant any preferential treatment in connection with another employee or job applicant engaging in sexual conduct.

Harassment of an employee will not be tolerated. Violations of this policy may result in disciplinary action, up to and including discharge. There will be no adverse action taken against employees who report violations of this policy in good faith or participate in the investigation of such violations.

**F. Complaint Procedure**

Any employee who feels that she or he is a victim of harassment, sexual harassment, or discrimination should immediately report the matter to the Human Resources Director (or if the Human Resources Director is involved, to the US Operation Director). If a manager or supervisor becomes aware of any actual or potential harassment or discrimination, the manager or supervisor shall contact the Human Resources Director (or if the Human Resources Director is involved, the US Operation Director) to ensure that appropriate action is taken. The Human Resources Director or a designated investigator will make a prompt and thorough investigation of all such claims and, where warranted, ensure that appropriate disciplinary action is taken. To the extent reasonably possible, the investigation and any subsequent action will proceed in an atmosphere of confidentiality.

1. If an employee makes a report to the Human Resources Director and he or she either does not respond or does not respond in a manner the employee deems satisfactory or consistent with this policy, the employee is required to report the situation to the US Operation Director or another member of management.
2. JWL/USA will investigate every reported incident immediately. Any employee, supervisor, or agent of JWL/USA who has been found to have violated this policy may be subject to appropriate disciplinary action, up to and including immediate discharge.
3. JWL/USA will conduct all investigations in a discreet manner and recognizes that every investigation requires a determination based on all the facts in the

matter. JWL/USA also recognizes the serious impact a false accusation can have. JWL/USA trusts that all employees will continue to act responsibly.

JWL/USA prohibits any form of retaliation against any employee for filing a good faith complaint under this policy or for assisting in a complaint investigation. However, if after investigating any complaint of harassment or unlawful discrimination, JWL/USA determines that the complaint was not made in good faith, or that an employee has deliberately provided false information regarding the complaint, disciplinary action may be taken against the individual who filed the complaint or who gave the false information. Employees who have made complaints of harassment or who have participated in an investigation should immediately contact the Human Resources Director (or if the Human Resources Director is involved, the US Operation Director) if the harassment resumes or if they believe that they have been retaliated against.

Violations of this non-harassment policy will not be permitted and may result in disciplinary action up to and including discharge.

#### **G. Categories of Employment**

1. **PROBATIONARY PERIOD:** Full-time and part-time employees are on probation during their first three months of employment. During this time, the supervisors will evaluate the progress of employees and their overall job performance. This probationary period is the final step of the selection process to determine whether the employee possesses the abilities to perform satisfactorily on the job. At the end of the probationary period, or earlier if necessary, the employee's supervisor will formally discuss with the employee his or her job performance. Only if performance and conduct satisfy the job requirements will the employee become a regular Full-Time or Part-Time employee, as applicable, at the end of this period. If the employee's performance or conduct is not satisfactory, or the supervisor does not believe that the employee has the capacity to fulfill the work requirements, the employee may either be terminated or the probationary period may be extended for up to one additional month. Successful completion of the probationary period does not change the at-will nature of the employment relationship between the employee and JWL/USA.
2. **FULL-TIME EMPLOYEES** regularly work 40 hours a week and are eligible for the benefits described herein, subject to eligibility requirements of such benefits.
3. **PART-TIME EMPLOYEES** regularly work less than 40 hours a week, and are eligible for statutory benefits only (except in the case of the retirement plan eligibility discussed later). Part-time employees working less than 20 hours a week are not eligible for benefits (including vacation and sick pay).

#### **H. Certification, Licensing, and Other Requirements**

You will be informed by your supervisor if there are any job-related licensing,

certification, or testing requirements for your job. Failure to qualify or to maintain a job-related certification or license may be sufficient cause for discharge.

## **I. Immigration Reform and Control Act**

In compliance with the federal Immigration Reform and Control Act of 1986 (IRCA), as amended, and any state law requirements if applicable, we are committed to employing only individuals who are authorized to work in the United States.

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.

If an employee is not a citizen or a lawful permanent resident, and is authorized to work in this country for a limited time period, the individual will be required to submit proof of renewed employment eligibility prior to the expiration of that period to remain employed by JWL/USA.

JWL/USA prohibits discrimination on the basis of citizenship status and national origin, and will treat all individuals equally without regard to citizenship or immigration status. During the employment eligibility verification and re-verification process JWL/USA will (1) honor documentation that on its face reasonably appears to be genuine, related to the person, and satisfies the I-9 requirements; (2) not request more or different documents than are required by law; (3) permit all employees to present any document or combination of documents acceptable by law.

## **J. Work Week and Office Hours**

The ordinary work week of JWL/USA is based on a flexible schedule from Monday through Friday from 8 a.m. until 6 p.m. The regular office hours for full-time employees will include eight hours of work time in a given day. For full-time employees, an hour of this time is given to and includes lunch and two break periods each work day. Supervisors may set modified ordinary work days or work hours according to the needs of the various offices or in order to meet JWL/USA contractual stipulations with third parties. Telecommuting work arrangements are allowed on a case by case basis, depending on the nature of the work of the individual employee, and must be approved in advance by the US Operation Director and the Human Resources Director.

## **K. Office Procedures**

JWL/USA expects each employee to:

1. Abide by all of its policies, rules, and regulations (see Policies and Procedures Handbook, Statement of Values and Code of Ethics, Conflict of Interest Policy, Whistleblower Policy and JWL International Code of Conduct; all documents now merged into last the section) as well as JWL's Safeguarding Policy for the

- Protection of Children and Adults at Risk and any other policy that the JWL implements during the employee's time of employment.
2. Accept and fulfill the responsibilities and obligations of their position as planned and assigned by their supervisors.
  3. Report to work on time and not prolong the lunch periods.
  4. Respect fellow employees by not disturbing them through prolonged conversations or unnecessary visiting of offices.
  5. Cooperate with fellow employees by seeking additional tasks from their supervisors when their assigned work is completed.
  6. Initiate suggestions through their supervisors for improvement in any area of the working environment.

**L. Performance Reviews**

Feedback on employee performance is very important. Although feedback should be provided on a regular basis, the intention of JWL/USA is that once each year, in or around January, each employee's supervisor will formally review job progress for the past year and help to set new job performance plans for the New Year. By the end of the first quarter of the new performance year the supervisor and employee should jointly document to the Human Resources Director that the annual evaluation has taken place.

The performance review program is designed to provide a basis for better understanding between the employee and the supervisor, with respect to job performance, potential, and development. In addition to such an annual review JWL/USA may formally or informally review an employee's work performance at any time. It is the intention of JWL/USA that new employees will be reviewed at the end of their probationary period and again during the January cycle if that period does not overlap with the initial review.

**M. New Employee Orientation**

Upon employment by JWL/USA, each person is given a copy of this Handbook and asked to complete personnel, payroll, and any applicable benefit forms. The employee's supervisor is responsible for the operations of the department and is a good information source about JWL/USA and the job.

**N. Grievances**

JWL/USA will try to resolve any grievance you have relating to your employment as quickly as reasonably practicable and in compliance with any statutory rules in force at the time. If you have a grievance you should first raise this with your immediate supervisor. In most cases employment, related problems are resolved informally in this way. If, however, you are not satisfied with the outcome of informal discussions then you may pursue the problem through JWL/USA's Grievance Procedure as outlined here.

There are three stages to the procedure that help to ensure that the grievance is dealt with fairly and objectively. At each stage, the grievance will be investigated thoroughly and you will be informed of the outcome.

**Stage 1:** You should submit a written summary of the grievance to your immediate supervisor. Your supervisor will, within five working days of receipt, investigate the grievance and arrange a meeting to discuss the problem. There may be instances (such as if detailed investigations are necessary) where your grievance cannot be dealt within five working days. In this case you will be notified of such by JWL/USA and a meeting will be arranged as soon as reasonably practicable. The person who heard your grievance will notify you of the outcome within five working days of the meeting.

**Stage 2:** If the grievance is not dealt with to your satisfaction at Stage 1 then an appeal may be made in writing within five working days of you receiving the original decision. This appeal will be dealt with by someone in the next level of the organization.

**Stage 3:** A meeting to discuss your appeal will be arranged within five working days of your appeal letter being received or as soon as reasonably practicable. Where possible the appeal will be heard by a supervisor who has not previously been involved with the matter. The person who heard the appeal will write to you (normally within five working days) of the meeting with the decision. This decision will be final and no further appeal will be possible.

At each stage of the procedure you may be accompanied by a fellow employee.

Where the grievance concerns the employee's immediate supervisor the US Operation Director will make arrangements to hear the first stage of the grievance personally or otherwise refer it to another supervisor unconnected to the events which are the subject of the grievance.

Confidentiality in relation to the grievance (including any investigation and outcome) will be preserved so far as this is possible. Please note however that the outcome of your grievance together with copies of any correspondence will be kept in your personnel file for 12 months.

## **2. *COMPENSATION***

### **A. General Policies**

It is the intention of JWL/USA that compensation is reviewed annually (usually in the month of October) and that any changes to compensation will become effective on January 1. Notwithstanding this intention, JWL/USA retains the right to modify an employee's salary or hourly rate of compensation at any time. The following factors, among others, affect compensation:

1. Financial ability of JWL/USA.
2. Satisfactory job performance as judged by the supervisor.
3. Project and funding requirements.

**B. Specific Policies**

1. Employment and compensation are based on either an annual salary or hourly wage.
2. Payments are made once a month on the last working day of the month.
3. Any payment of compensation or other amounts are subject to federal, state and/or local income taxes or other withholding authorized by the employee and/or which JWL/USA reasonably determines necessary and/or advisable under applicable law.

**C. Employee Classifications**

JWL/USA designates each employee as either exempt or nonexempt in compliance with applicable federal and state law.

1. Exempt employees are paid a fixed salary and are not entitled to overtime pay.
2. Nonexempt employees are entitled to overtime pay at a rate of one and one-half times their regular rate of pay for all hours worked over 40 in one work week, as required by applicable federal and state law.

**D. Timesheets/Leave Reporting**

All employees must accurately record all hours worked for JWL/USA. Employees must submit their hours worked or use of leave time on monthly timesheets/leave report forms to their supervisors by the 27<sup>th</sup> each month. Nonexempt employees should record all hours worked and breaks longer than 20 minutes, including meal breaks.

Off-the-clock work is strictly prohibited. Fraudulent timekeeping and falsification of time records are subject to discipline, up to and including termination of employment.

**E. Pay Day**

Payroll period is once every four weeks (13 payroll periods per year) and the pay day is within five (5) business after the completion of the payroll period. Please review your paycheck for accuracy. If you find an issue, report it to your supervisor immediately. Your supervisor will assist you in taking the steps necessary to correct the situation.

**F. Direct Deposit**

All employees are ordinarily paid through the direct deposit program. Employees that elect not to participate in direct deposit may be issued a check for wages due each payday.

**G. Overtime**

1. There may be times when overtime work is necessary. All overtime should be approved in advance by the employee's supervisor. However, if it becomes necessary to work overtime to meet the needs of the organization and prior approval is not feasible, the employee must report all hours worked and provide an explanation to the supervisor as soon as practicable. Exempt employees do not receive overtime pay.
2. Compensatory time may be negotiated for exempt employees under certain travel itineraries (e.g., extended Africa or Asia trips, etc.) deemed by the supervisor to warrant compensatory time. Compensatory time must be used within the month in which it is accrued. Exceptions to this time limit require written approval in advance by the Human Resources Director. Employees will not be paid in lieu of taking compensatory time.

**H. Paycheck Deductions**

An employer is required by law to make certain deductions from your paycheck each pay period. Such deductions typically include federal and state taxes and social security (FICA) taxes. Depending on the state in which you are employed and the benefits you choose, there may be additional deductions. All deductions and the amount of the deductions are listed on your pay stub. These deductions are totaled each year for you on your Form W-2, Wage and Tax Statement.

It is the policy of JWJL/USA that, other than taking deductions for appropriate taxes, exempt employees' pay generally will not be "docked" or subject to deduction. However, JWJL/USA may make deductions from employees' salaries in a way that is permitted under federal and state wage and hour rules. Employees will be reimbursed in full for any isolated, inadvertent, or improper deductions, as defined by law.

Exempt employees may be subject to salary deductions for the following reasons:

1. Absences of one or more full days for personal reasons (once the two-personal day benefit per year has been exhausted), other than sickness or disability; or
2. Absences of one or more full days due to sickness or disability, if there is a plan, policy, or practice providing replacement compensation for such absences; or
3. Absences of one or more full days before eligibility under such a plan, policy, or practice or after replacement compensation for such absences has been exhausted; or

4. Suspensions of one or more full days for violations of safety rules of major significance; or
5. Suspensions of one or more full days for violations of written workplace conduct rules, such as rules against sexual harassment and workplace violence; or
6. Payment of actual time worked in the first and last weeks of employment, resulting in a proportional rate of an employee's full salary; or
7. Negative paid-time-off balances, in whole-day increments only.

Any deductions from employees' wages are made in accordance with applicable state and federal laws. If questions or concerns about any pay deductions arise, employees may discuss and resolve them with their supervisor or any other member of management. If an error is found, you will receive an immediate adjustment which will be paid no later than on the next regular payday.

**I. Garnishment and Child Support**

When an employee's wages are garnished by a court order, JWL/USA may be legally bound to withhold the amount indicated in the garnishment order from the employee's paycheck, subject to applicable state and federal guidelines that protect a certain amount of an employee's income from being subject to garnishment.

**J. Loans to Employees**

JWL/USA does not make loans, advances on expenses nor salary advances to employees.

**K. Unemployment Compensation**

Upon separation of employment and subject to eligibility requirements, you may be entitled to unemployment insurance benefits. Information about unemployment insurance can be obtained from your local state agency.

**L. Severance Pay**

Full-time employees and part-time employees (working less than 40 hours per week with a minimum of 20 hours per week and a projected continued service of 1,040 hours during any 12-month period following the date of hire) may, at JWL/USA's sole discretion, be provided severance pay if the employment termination is initiated by JWL/USA. The decision whether to offer severance pay in any particular case shall be made by JWL/USA in its sole discretion.

Specifically excluded from severance pay under this provision are employees hired as temporary employees for a specified period of time. Severance pay also will not be paid to employees who are terminated for misconduct.

The Human Resources Director and the US Operation Director must approve all severance packages before the employee is offered severance pay. Severance pay is at the discretion of JWL/USA and is dependent upon the circumstances

surrounding the termination. A “release of claims” is required as a condition for severance pay.

If a JWL/USA employee is terminated as the result of the cessation of a grant, that employee will be considered for severance pay in accordance with the following schedule:

1. *Less than one year of employment:* Proportional payment of up to five working days at the current employee base weekly pay rate;
2. *One year or more years of employment:* Payment of five working days at the current employee base weekly pay rate for each year of employment with JWL/USA.

If a JWL/USA employee is terminated for a reason other than grant cessation or misconduct, JWL/USA may offer severance at its discretion.

Severance pay will be paid one-time as a lump sum payment once the “release of claims” agreement has been signed by both the employee and JWL/USA. Terminated employees may continue health insurance coverage under the provisions of COBRA. Currently, COBRA allows a period of up to 18 months, in effect at that time for employee (and as applicable dependent) coverage.

Accrued vacation time will be paid in accordance with this Handbook, and is considered separate and in addition to severance pay.

### **3. *BENEFITS***

#### **A. General Policies**

This Handbook provides a summary description of JWL/USA benefits. If any term of this Handbook contradicts the plan documents in any way, the plan documents will govern. Eligibility for benefits is governed exclusively by the terms of the specific plan documents. For further information regarding benefits, including eligibility requirements, please contact the plan administrator. JWL/USA retains the right to modify, suspend, or cancel any benefits at any time, unless otherwise prohibited by law.

#### **B. Hospital and Medical Insurance Program**

1. Subject to eligibility requirements based on local state guidelines, medical, dental and vision insurance coverage is offered from the day of employment to full-time employees through the Health Care Exchange.
2. The program is co-shared cost between JWL and the employee and is determined by the most current plan document.
3. Employees are required to enroll or decline enrollment via USA Operations Team.

4. Claims and payments are handled directly between the doctor or hospital and the insurer. JWL/USA does not serve as agent for claims and payments.
5. If an employee declines to enroll in the benefit plan provided by JWL/USA, JWL/USA will not make any adjustment in salary.
6. In the case of termination of employment or reduced working hours, the plan administrator will contact employees concerning their options. Terminated employees covered under this plan must contact the US Operations Director within 30 days of termination of employment or termination of severance pay, when appropriate, for notification of options (whichever is later) if they wish to continue their health care insurance through the Federal COBRA, Consolidated Omnibus Budget Reconciliation Act of 1985, subject to the then current rules regarding such coverage, including the payment by the employee of all premium costs. For a more detailed explanation of the Federal COBRA and Washington, D.C. Continuation of Health Care Coverage, please refer to the appropriate health care plan booklet.

**C. Retirement Program**

1. All full-time employees who have attained age twenty-one (21) and who has successfully completed the three-month probationary period with JWL/USA will be eligible to enrolled in the 401(K)-retirement program of JWL/USA. Any part-time employee of JWL/USA who has attained age twenty-one (21), who has successfully completed the three-month probationary period with JWL/USA and who works more than 20 hours per week will be eligible to enrolled in the retirement program. The retirement plan document will be available from the Finance Office.
2. Once an employee is enrolled in the retirement program, JWL/USA shall contribute an amount equal to 5% of such employee's base salary into the plan. The payments are made monthly either upon enrollment and after the completion of the three-month probationary period. The employee may elect to contribute additional amounts to the plan subject to a maximum amount set by applicable law. The employee's contribution is pre-tax.
3. During any leave of absence without pay (regardless of length), or during the severance pay period JWL/USA will suspend contributions to the retirement plan.
4. Each employee's retirement plan account is for the sole purpose of providing such employee a retirement and/or death benefit, and is the property of such individual participant.

**D. Workers' Compensation**

On the job injuries to full or part-time employees may be covered by a Workers' Compensation Insurance Policy provided at no cost to the employee. If an employee is injured on the job, no matter how slightly, the incident must be reported immediately to the Human Resources Director or his designee. The

State of Washington requires such notification within 30 days. Please check with the Human Resources Director or US Operations Director for notification deadlines in other localities or States. Failure to do so may jeopardize the right to receive any or all compensation with respect to such injury. Assistance is asked in calling attention to any condition which could lead or contribute to an employee accident.

#### **4. *TIME AWAY FROM WORK***

##### **A. General Policies**

The services of all employees of JWL/USA are very important in carrying out JWL/USA's mission. On the other hand, circumstances do arise that make it impossible for an employee to be at work and there is also a necessity for holidays and vacations to sustain both body and spirit. The following policies cover various circumstances in which an employee is away from work. Other than for designated holidays, employees must notify their supervisors in writing (email is acceptable) in advance of such absence (if at all possible) for any time away from work so that personnel records are maintained correctly. It is the responsibility of the supervisor to ensure that an employee's time sheet accurately reflects such time away from work. The Operations Team will periodically provide employees with a report of their leave time accrued and used; these forms will be assumed to be an accurate record unless the employee notifies the office within 15 days of the report's distribution.

##### **B. Vacation**

Vacation days are earned by full-time employees at the rate of 1.25 days per month for an annual vacation leave of fifteen (15) working days with pay. After the 5 year of employment, the monthly earned vacation rate is changed to 1.66 for full-time employees, allowing for annual vacation leave of twenty (20) working days with pay. The rate at which part-time employees earn vacation days is prorated based on the percentage of a full-time schedule that the part-time employee works. Part-time employees working less than 20 hours a week are not eligible for vacation.

Vacation may be taken as accrued at any point during the year with the necessary approval. You should attempt to use all of your accrued vacation time before December 31 of each year. Nevertheless, if you are unable to take all of your allotted vacation time, you may carry-over up to five days of vacation into the following year. As of December 31, of each year, all unused vacation time other than these 5 days of carry-over will be forfeited.

In order to ensure continuity in carrying out necessary work within the office, vacations should be scheduled at least one month in advance with the approval of the employee's supervisor. The supervisor has discretionary authority to limit vacation time to certain months and to deny vacation requests to accommodate JWL/USA staffing needs. The supervisor or the Human Resources Director also

have discretionary authority to request employees to make full use of their vacation leave in cases where such employees have been hired for a position that it is tied to contractual stipulations with a third party. Vacation pay will be at the rate of the current base salary at the time when the vacation is taken. Any special arrangements made between an employee and his or her supervisor should be submitted in writing to the Human Resources Director.

**Extra pay in lieu of actual vacation will not be given.**

Vacation leave may not be accumulated beyond that provided for above. In the case of termination of employment after any continuous year of service, all allowable, accrued but unused vacation time at the end of that year will receive proper remuneration.

**C. Discretionary Leave**

At JWL/USA's sole discretion with specific approval from the US Operation Director or Human Resources Director, full-time and part-time employees may request to take unpaid leave, in full-day increments, of up to ten days per year for full-time employees and five days per year for part-time employees.

**D. Various Types of Leave**

It is the responsibility of the employee to notify the supervisor (if the supervisor is absent, the Human Resources Director) of absences due to sickness and health care.

**1. Sick Days**

Sick days are earned by full-time employees at a rate of 1.25 per month and by part-time employees at a pro-rated rate based on the portion of a full-time schedule regularly worked by such part-time employee. Part-time employees working less than 20 hours a week are not eligible for paid sick days. Employees, after a period of ninety (90) days of continuous employment, may receive sick leave benefits under the following circumstances:

- a. Except as otherwise set forth herein (e.g. see sections g and h below), an employee is eligible for sick leave only when illness or injury makes it impossible or inadvisable for the employee to come to the office.
- b. As sick leave is used, the days will be subtracted from the total number accumulated. Sick is accumulated based on a calendar year.
- c. If the fifteen (15) days of sick leave accumulated in one calendar year are not completely used, the employee will not be paid for the unused number of days nor will the unused number of days be allowed to carry over into the following calendar year. Sick leave time may not be used to extend vacations.
- d. Employees are not permitted to accumulate a negative sick leave balance.

- e. It is understood that if more than the amount of accumulated sick leave is taken, no wages will be paid for such time off in excess of the number of days accumulated.
- f. It is the employee's responsibility to notify JWL/USA of illness. A self-certification note must be presented by an employee after an absence of two consecutive days. The employee self-certification note must include information about your sickness or illness, the date your sickness started, and the date your sickness ended. A physician's verification of illness and of the ability to return to work must be presented by an employee after an absence of three or more consecutive days. For an illness that lasts longer than ten days, an employee may apply for Individual or Family Medical Leave as describe below in Section #5.
- g. It is the office policy that health care and other appointments should not generally be scheduled during office hours. Nonetheless, employees may use up to two accrued sick days per year as personal days for the scheduling of such appointments.
- h. An employee may request sick leave when his or her presence is required because of sickness, injury, death, or another serious reason involving such employee's immediate family. If approved, sick leave will be used for this type of absence before other types of leave will apply.
- i. An employee may apply a part of a work day for sick leave.

## **2. Maternity/Parental Leave**

- a. JWL/USA provides six weeks of paid maternity leave at the current base salary when the leave is taken. To be eligible for such leave, the employee must have worked for JWL/USA for at least twelve months and, during the twelve-month period preceding the leave, must have worked for JWL/USA for at least 1,000 hours.
- b. JWL/USA also provides two weeks of paid parental leave at the current base salary when the leave is taken in order to allow fathers, adoptive, and foster parents to bond with the new child. This leave must be used in the first three months after the birth, adoption or arrival of a child.
- c. JWL/USA allows employees up to six additional weeks of unpaid leave during any twelve-month period for the birth of a child to the employee or the employee's spouse or the placement of a child with the employee for adoption or foster care. When both parents of a newborn or newly adopted child work for JWL/USA, JWL/USA will provide the two employees with a combined total of six weeks of leave. If the employee wishes to have part or all of the leave be paid leave, s/he may use a combination of accrued sick leave and accrued vacation to do so. The leave must be taken within twelve months of the event, but it need not be taken all at once. At least thirty days in advance of the event the employee is expected to reach an agreement with the Human Resources Director on a plan for maternity or paternal leave. An employee on this type of unpaid leave will continue to receive

health insurance under the same terms as if the employee were not on leave, but the employee will not accrue any other benefits while on unpaid leave. Benefits will accrue in the case of paid leave.

### **3. Individual or Family Medical Leave**

JWL/USA allows employees up to sixteen weeks of unpaid leave during any twenty-four-month period due to a serious health condition that makes the employee unable to perform his or her job functions or in order to care for a spouse, son, daughter, or parent with a serious health condition. To be eligible for such leave, the employee must have worked for JWL/USA for at least twelve months and, during the twelve-month period preceding the leave, must have worked for JWL/USA for at least 1,000 hours.

For the purpose of this policy, the term “serious health condition” includes conditions or illnesses that affect an employee’s health to the extent that he or she must be absent from work on a recurring basis or for more than a few days for treatment or recovery. Short-term conditions for which treatment and recovery are very brief, such as minor illnesses that last only a few days and surgical procedures that do not require hospitalization and have only a brief recovery period, are not serious health conditions. The term “serious health condition” specifically includes medical conditions resulting or arising from an ongoing pregnancy, miscarriage, complications or illnesses related to pregnancy (such as severe morning sickness or the need for prenatal care), childbirth and recovery from childbirth.

At least thirty days in advance of beginning individual or family medical leave (to the extent it is foreseeable) the employee is expected to reach an agreement with the Human Resources Director on a plan for this leave. If the need for medical leave is not anticipated this far in advance or is covered under short-term disability, the employee is expected to provide as much notice as is practicable. When a leave is taken due to the serious health condition of an employee or his or her family member and the need for the leave is foreseeable based on planned medical treatment, the employee is required to make a reasonable effort to schedule the treatment so as not to unduly disrupt JWL/USA’s operation and to provide at least thirty days’ notice of the leave, unless the treatment date requires the leave of absence to begin in less than thirty days. Throughout their leaves, employees are to report periodically on their status and their intention to return to work. (Special arrangements may be made for part-time work during these circumstances if this is agreeable to all parties concerned.)

An employee, who takes a leave of absence because of his or her own serious health condition or the serious health condition of a family member, will be required to provide medical certification from the health care provider. Normally, such certification must set forth the date on which the serious health condition began and the probable duration of the condition. If the employee’s

serious health condition is involved, the certification must state that the employee is unable to perform the functions of his or her job. If a family member's serious health condition is involved, the certification must state that the employee is needed to care for that individual and include an estimate of the amount of time that the employee will be needed to do so. If the leave is for planned medical treatment and will result in an intermittent or reduced leave schedule, the certification also must state the dates on which such treatment is expected and the duration of the treatment—to the extent that this is possible. JWLS/USA reserves the right to require an employee, at JWLS/USA's expense, to obtain a second opinion from another health care provider selected by JWLS/USA.

If the employee wishes to have part or all of the leave be paid leave, s/he may use a combination of accrued sick leave and accrued vacation to do so. The leave must be taken within twelve months of the event, but it need not be taken all at once. An employee on unpaid leave will continue to receive health insurance under the same terms as if the employee were not on leave, but the employee will not accrue any other benefits while on unpaid leave. Benefits will accrue in the case of paid leave. At the end of the leave of absence, JWLS/USA normally will reinstate the employee to his or her previous position or to an equivalent one, with equivalent pay, benefits, and other terms and conditions of employment. Before reinstating the employee, however, JWLS/USA will require the employee to provide medical certification stating that the employee is able to resume work.

#### **4. Bereavement Leave**

- a. Absence without loss of pay for up to three work days will be allowed in case of the death of the following members of the immediate family (father, mother, spouse, son, daughter, brother, sister, grandparent, mother-in-law, or father-in-law.)
- b. An employee may take additional vacation time or an unpaid leave of absence if necessary for this purpose and if approved by the supervisor.

#### **5. Military Leave**

Leaves of absence without pay for military or Reserve duty are granted to full-time or part-time employees. An employee who is called to active military duty or Reserve or National Guard training, or an employee who volunteers for the same must notify his or her supervisor and give the supervisor copies of the employee's military orders, or other proof of military obligations, as soon as practicable. The employee will be granted a military leave of absence without pay for the period of military service, in accordance with applicable federal and state laws. An employee who is a reservist or member of the National Guard is granted time off without pay for required military training. The employee's eligibility for reinstatement after his or her duty or training is determined in accordance with applicable federal and state laws. JWLS/USA will not

discriminate or retaliate against any employee or prospective employee with regard to hiring, retention, promotion, or reemployment because of past, present, or future membership, application for membership, or performance of ordered military duty in any of the uniformed services.

All questions concerning this policy should be directed to JWL/USA's Human Resources Director.

## **6. Voting Time**

JWL/USA encourages all employees to fulfill their civic responsibilities and to vote in all official public elections. JWL/USA working hours are generally such that employees will have ample time to cast their vote before or after working hours.

## **7. Jury Duty**

An employee who is selected for jury duty will be paid the difference between the compensation received from the court and the regular base pay, provided that the time away from work for jury duty does not exceed ten (10) work days. After such ten (10) day period, employees may take accrued vacation leave, and conditions for an unpaid leave of absence for employees may apply at this point. Before payment can be made for days on jury duty less than ten (10) days, the employee must give the supervisor a copy of the notification of jury duty selection and statement from the court showing the rate of compensation paid by the court, or the employee may turn in to the Finance Office the payment from the court endorsed to JWL/USA and receive his/her regular paycheck. If the employee is excused by the court on any day at 1:00 p.m. or earlier, she or he is expected to return to work for the remainder of the day. JWL/USA will make no attempt to have the jury service of an employee postponed except when business conditions necessitate such action.

## **8. Witness Leave**

Employees are given the necessary time off to attend or participate in a court proceeding in accordance with state law. This time off is unpaid, unless state law dictates otherwise. We ask that you notify your supervisor of the need to take witness leave as far in advance as possible.

## **9. School Activities Leave**

An employee who is a parent, legal custodian, guardian, aunt, uncle, or grandparent, or the spouse of such a person, may take a total of 24 hours of unpaid leave during any 12-month period to attend or participate in school-related events. To be eligible for parental leave, an employee must notify their supervisor and the US Operation Director at least 10 calendar days in advance. If the employee's need is not foreseeable, the employee should give as much notice as is practical. JWL/USA may deny a request for leave if granting the leave would be unusually difficult and disrupt JWL/USA's business.

## 10. Public Holidays

Full-time employees and part-time employees working less than forty hours per week (with a minimum of twenty hours per week and a projected continued service of 1,040 hours during any twelve-month period following the date of hire) receive an average of twelve (12) public holidays annually with full pay. The following days, when they occur during the standard work week of Monday through Friday, are generally treated as public holidays:

New Year's Day

Martin Luther King Jr.'s Birthday

Presidents' Day

Good Friday

Memorial Day

Independence Day

Labor Day

Columbus Day

Thanksgiving Day

Friday after Thanksgiving

Christmas

Day before or after Christmas (at employer's discretion) \*

Day before New Year's Day (at employer's discretion) \*

*\*JWL/USA will inform employees of any changes in the holidays recognized in this manner.*

## 5. ***STANDARDS OF CONDUCT***

### A. **General Policies**

Each employee has an obligation to observe and follow JWL/USA's policies and to maintain proper standards of conduct at all times. If an individual's behavior interferes with the orderly and efficient operation of a department, corrective disciplinary measures will be taken.

Disciplinary action may include a verbal warning, written warning, suspension with or without pay, and/or discharge. The appropriate disciplinary action imposed will be determined by JWL/USA in its sole discretion. JWL/USA does not guarantee that one form of action will necessarily precede another, and specifically reserves the right to immediately terminate employment in appropriate circumstances.

The following are examples of misconduct that may result in discipline up to and including discharge: flagrant misconduct, violation of JWL/USA's policies or safety rules, insubordination, poor attendance, possession, use or sale of alcohol

or controlled substances on work premises or during working hours, unauthorized possession, use or sale of weapons, firearms or explosives on work premises, poor performance, theft, or dishonesty, physical harassment, sexual harassment, or disrespect toward fellow employees, visitors, or other members of the public. These examples are not all-inclusive. Discharge decisions will be based on an assessment of all relevant factors.

Nothing in this policy is designed to modify our employment-at-will policy.

**B. Absenteeism and Tardiness**

JWL/USA expects all employees to assume responsibility for attendance and promptness. An employee who is frequently absent or tardy and/or absent without notifying his or her supervisor as specified above may be subject to disciplinary action. Except under extraordinary circumstances an employee who is absent without proper notice for three working days may be considered to have resigned his or her position.

**C. Conflict of Interest**

As defined by policy, a conflict of interest is considered to exist in any instance in which an individual's actions or activities on behalf of JWL/USA involve a gain or advantage to the individual, or an adverse effect on JWL/USA's interests. It can also result when the conflict of interests prevents employees from exercising care, skill, and judgment on behalf of JWL/USA in the performance of their assigned duties.

JWL/USA prohibits all employees from accepting any gift or gratuity with a value in excess of \$100 (or multiple gifts or gratuities with an aggregate value in excess of \$100) from outside organizations, corporations, companies, partnerships, or other entities which provide goods or services to JWL/USA.

No employee may accept business entertainment that would be considered excessive from any outside organization that may engage in business with JWL/USA. The acceptance of occasional invitations to dinner, sporting events, theater presentations, etc., is acceptable in most circumstances. Employees must consult with and report to their supervisors any instances of gifts or gratuities offered to them by any outside organization, or any attempt to influence the performance of their assigned duties through the offer of gifts, gratuities, or excessive entertainment, that appears or may appear to be in violation of this policy.

**D. Confidentiality**

All confidential, personal, or proprietary information concerning past and present employees, Jesuits, donors, partners, funders and firms with which JWL/USA does business is to be maintained in strict confidence. Employees should, therefore, never share or discuss such information without clear and prior authorization from their supervisors. Failure to protect confidential information could result in disciplinary action even including termination of employment. This same strict confidentiality shall be observed by employees even after they have left employment with JWL/USA.

Employee may obtain access to information related to JWL's mission (including technical information, strategy plans, student and teacher information, financial data, employee information and proprietary information of third parties provided to JWL in confidence) that JWL considers to be confidential or proprietary or JWL has a duty to treat as confidential. The employee will (a) hold all Confidential Information in strict trust and confidence; (b) not use or permit others to use Confidential Information in any manner or for any purpose not expressly permitted or required to perform their work duties; and (c) not disclose or permit others to disclose any Confidential Information to any third party without obtaining JWL's express prior written consent on a case-by-case basis.

This confidentiality policy does not apply to communications with the EEOC, OSHA, or other administrative or law enforcement agencies. Additionally, this confidentiality policy does not prevent employees from sharing or discussing confidential, personal, or proprietary information as required by law.

**E. Protecting JWL/USA Information**

Protecting JWL/USA's information is the responsibility of every employee. Do not discuss JWL/USA's confidential or proprietary matters, or share confidential, personal employee information with anyone who does not work for us, such as friends, family members, members of the media, or other business entities.

Confidential information does not include information pertaining to the terms and conditions of an employee's employment. Nothing in this policy is designed to limit an employee's rights under Section 7 of the National Labor Relations Act.

**F. Ownership**

All deliverables, ideas, inventions, improvements, methods, processes, works of authorship and other forms of intellectual property that the employee conceives, reduces to practice or develops during the term of their employment at JWL, alone or in conjunction with others, in connection with performance of their job duties and responsibilities, including designs, data, software code, ideas, inventions, know-how, materials, marks, methods, procedures, tools, interfaces, and other forms of technology as well as any intellectual property rights of any kind therein (collectively, the "Work Product"), will be the sole and exclusive property of JWL. Any and all elements of the Work Product that are works of authorship eligible to be "works made for hire" under the U.S. Copyright Act shall be considered works made for hire with JWL as "author." The employee hereby irrevocably assigns to JWL all rights, title and interest worldwide in and to the Work Product and all intellectual property rights therein. This transfer and assignment includes, but is not limited to, the right to publish, distribute, make derivative works of, edit, alter or otherwise use the Work Product in any way JWL sees fit.

**G. Changes in Personnel Data**

It is essential that up-to-date information about employees be maintained in order to assist employees and their families in matters including personal emergency and proper administration of benefits.

Changes in name, address, telephone number, marital status, number of

dependents, or changes in next of kin and/or beneficiaries should be given promptly to the Human Resources Director, the Finance Office, and one's supervisor.

**H. Care of Equipment**

Employees are expected to use proper care when using JWL/USA's property and equipment. No property may be removed from the premises by an employee without notification and proper authorization from his or her supervisor. If any property is lost or damaged it should be reported to the employee's supervisor at once.

**I. Personal Property**

JWL/USA is not responsible for loss or damage to personal property. Valuable personal items, such as purses and all other valuables, should not be left in areas where theft might occur.

**J. Dress Policy**

Employees are expected to maintain the highest standards of personal cleanliness and present a neat, professional appearance at all times. "Business casual" is appropriate dress in the office unless particular circumstances—such as meeting with outside persons—dictates something more formal.

**K. Outside Employment & Contracting**

JWL/USA hopes that employees will not find it necessary to seek additional outside employment. However, if an employee is planning to accept any outside position, be it employment or as an independent contractor, that she or he intends to hold while employed with JWL/USA, then the employee must notify his or her supervisor in writing. Outside employment or independent contracting work must not conflict in any way with responsibilities within JWL/USA. Employees also may not take sick, family, or other leave from JWL in order to fulfill job responsibilities with another employer or contractor.

**L. Travel/Expense Accounts**

JWL/USA will reimburse employees for reasonable and documented expenses incurred through business travel or other JWL/USA related expenditures that have had the prior approval of the supervisor. All cash related expense advances must be accounted for and expense receipts are required. Forms for requesting the reimbursement of business expenses are available in the Finance Office. Requests for reimbursement must be made within 30 days after the costs are incurred.

**M. Good Housekeeping**

Good work habits and a neat place to work are essential for job safety and efficiency. Employees are expected to keep their places of work organized and materials in good order at all times. Anything that needs repair or replacement should be reported to the supervisor.

**N. Work Related Phones**

JWL/USA will provide employees, on a case by case basis, and contingent to the needs of their job responsibilities wireless phone service. Qualifying employees will be offered, at JWL/USA's expense, a standard voice/data plan and will also be provided with a standard smart phone unit. As an alternative, employees may also have the option to receive a reimbursement for business use of their own personal phone at a monthly rate that will be set annually by JWL/USA.

**O. Personal Phone Calls, Faxes, and Mail**

Personal phone calls may occasionally be necessary during working hours. They should, however, be kept to a minimum and should be of short duration. Long distance calls of a personal nature should be charged to an employee's home phone or calling card. If it is absolutely necessary to charge a personal long-distance call or fax to the office, the employee should turn in a record of the date, time, and number called to his or her supervisor and reimburse the office for the call within one month. The honor policy is used in these circumstances, but failure to pay for personal calls and faxes may be subject to disciplinary action.

No smart phone apps charges or other type of smart phone products or services should be charged to the employee's wireless phone service account. In case the employee incurs any of these charges, the employee must reimburse immediately any associated costs to JWL/USA and refrain from incurring in such charges in the future.

Personal mail should not be addressed to the office. Outgoing personal mail may be metered through the postal meter, but an employee is expected to reimburse the office for such postage each month.

**P. Lactation Break**

JWL/USA will provide a reasonable amount of break time to accommodate a female employee's need to express breast milk for the employee's infant child up to one year of age; unless additional time is required by state law. The break time should, if possible, be taken concurrently with other break periods already provided. Non-exempt employees should clock out for any time taken that does not run concurrently with normally scheduled rest periods, and such time generally will be unpaid in accordance with state law. JWL/USA will also make a reasonable effort to provide the employee with the use of a room or other location in close proximity to the employee's work area, for the employee to express milk in private. Employees should notify their supervisor to request time to express breast milk under this policy. No provision of this policy applies or is enforced if it conflicts with or is superseded by any requirement or prohibition contained in a state or local law, or regulation. Anyone with knowledge of such a conflict or potential conflict should contact their supervisor.

**Q. Smoking in the Work Place**

Smoking is not permitted in JWL/USA offices. JWL/USA is committed to

providing a safe healthy environment for employees and visitors that is free from secondary smoke.

**R. Substance Abuse**

No employee shall work, report to work, or be present on JWL/USA's premises, in JWL/USA vehicles, or engage in JWL/USA activities while under the influence of alcohol or illegal substances which may affect job safety or performance. The unlawful or unauthorized manufacture, distribution, dispensation, possession, sale, or use of alcohol or controlled substances on JWL/USA premises, in JWL/USA vehicles, or while engaged in JWL/USA activities is also strictly prohibited. Any violation of this substance abuse policy may result in disciplinary action, including immediate discharge.

JWL/USA further reserves the right to take any and all appropriate and lawful actions necessary to enforce this substance abuse policy including, but not limited to, the inspection of the employees' personal property in certain circumstances, as well as JWL/USA-issued lockers, desks, or other suspected areas of concealment. Full compliance with this substance abuse policy is a condition of employment and continued employment.

Subject to contractual stipulations with third parties, JWL/USA employees may be required to undergo periodic drug testing. In these cases, timely full compliance with this drug testing requirement is a condition of employment and continued employment.

**S. Workplace Safety: Employee Responsibilities**

Safety can only be achieved through teamwork. Each employee and supervisor must practice safety awareness by thinking defensively, anticipating unsafe situations, and reporting unsafe conditions immediately.

Please observe the following precautions:

1. The supervisor should be notified of any emergency situation. If an employee is injured or becomes sick at work, no matter how slightly, she or he must inform the supervisor immediately.
2. Employees should use, adjust, and repair machines and equipment only if they are trained and qualified.
3. Employees should get help when lifting or pushing heavy objects.
4. Employees should know the locations, contents, and use of first aid and firefighting equipment; procedures for emergency evacuation of the building.

A violation of a safety precaution is in itself an unsafe act. A violation may lead to disciplinary action up to and including discharge.

**T. Workplace Violence**

Violence by an employee or anyone else against an employee, supervisor, or member of management will not be tolerated. The purpose of this policy is to minimize the potential risk of personal injuries to employees at work and to reduce

the possibility of damage to JWL/USA property in the event someone, for whatever reason may be unhappy with a JWL/USA decision, or action by an employee, or member of management.

If you receive or overhear any threatening communications from an employee or outside third party, report it to your supervisor at once. Do not engage in either physical or verbal confrontation with a potentially violent individual. If you encounter an individual who is threatening immediate harm to an employee or visitor to our premises, contact an emergency agency (such as 911) immediately.

All reports of work-related threats will be kept confidential to the extent possible, investigated and documented. Employees are expected to report and participate in an investigation of any suspected or actual cases of workplace violence and will not be subjected to disciplinary consequences for such reports or cooperation.

Violations of this policy, including your failure to report or fully cooperate in JWL/USA's investigation, may result in disciplinary action, up to and including immediate discharge.

**U. No Weapons in the Workplace**

Possession, use or sale of weapons, firearms, or explosives on work premises, while operating JWL/USA machinery, equipment, or vehicles for work-related purposes or while engaged in JWL/USA business off premises is forbidden.

This policy applies to all employees, including but not limited to those who have a valid permit to carry a firearm.

Employees who are aware of violations or threats of violations of this policy are required to report such violations or threats of violations to their supervisor immediately. Violations of this policy will result in disciplinary action, up to and including discharge.

**V. Press and Media**

All media communication and interaction must be approved by JWL prior to engaging in such activities. Any news release, public announcement, advertisement, public statement or research publication to be released (including on social media platforms) in connection with JWL's mission work must have the prior written approval from JWL before being published.

**W. Social Media Policy**

Social media is the term given to any digital technology or practice that enables people to use, create and share content, opinions, information and insights over the internet. This includes many of the platforms traditionally identified as social media such as Facebook, Twitter and LinkedIn. It also includes other communication channels such as YouTube, Flickr, Instagram, blogs, wikis and

comments posted on websites. These guidelines apply to both social media use on authorized corporate channels and to any personal use of social media when your communications relate to JWL/USA or the Catholic Church.

Social media can affect JWL/USA's reputation. Social media conduct should not be any different from your regular, everyday conduct as an employee, using sound judgment and common sense. And, of course, you must comply with all applicable law and following all of JWL/USA's policies as set forth in the Handbook, including, without limitation, the JWL/USA's policies regarding confidential, proprietary, or material non-public information, trade secrets, or customer information; JWL'S policies regarding intellectual property; and JWL/USA's policies regarding unlawful discrimination and/or harassment.

When posting online about JWL/USA or the Catholic Church, please be mindful of the following guidelines:

1. Add a disclaimer. Never represent yourself as a spokesperson for JWL/USA when expressing your personal opinions. If you comment on any aspect of JWL/USA's business, please clearly identify your relationship to JWL/USA and include a disclaimer such as, "the views expressed are mine alone and do not necessarily reflect the views of JWL/USA."
2. Be honest and accurate. Make sure you are always honest and accurate when posting information or news, and if you make a mistake, correct it quickly. Never post any information or rumours that you know to be false about the JWL/USA, fellow employees, or people working on behalf of JWL/USA.
3. **You are responsible for your actions. We encourage you to get online and have fun, but use sound judgment and common sense. Ultimately, you are solely responsible for what you post online. Be mindful that what you publish will be public for a long time.**

## **X. Acceptable Use Policy for IT Resources**

### **Use of IT resources**

Use of IT resources by employees of JWL/USA is permitted and encouraged where such use supports the goals and objectives of the organization. However, JWL/USA's IT resources should be used in a professional manner. Occasional personal use of these resources is permitted, but such use should be minimized and should not interfere with employees' work or the business of JWL/USA.

### **Unacceptable behavior**

- Using JWL/USA communications systems to set up personal businesses, send chain letters, or store excessive amounts of personal data, including music files.
- Distributing, disseminating, receiving, viewing or storing images, text or materials that might be considered indecent, pornographic, obscene or illegal.
- Distributing, disseminating, receiving, viewing or storing images, text or

materials that might be considered offensive or abusive, in that the context is a personal attack, sexist or racist.

- Accessing copyrighted information in a way that violates the copyright.
- Attempting to defeat identification procedures, gain passwords or encryption codes, intercept communications meant for another party, penetrate security measures, or otherwise access confidential or personal data other than as authorized for business need, to include information stored in corporate, system, or another individual's folders, computer files, or work areas for subterfuge or with intent to cause detriment to the individual, JWL/USA, or any other third party
- Transmitting unsolicited commercial or advertising material.
- Deliberately undertaking activities that waste IT staff effort or resources. (i.e., installing unauthorized programs that use JWL/USA IT resources.)
- Introducing any form of computer virus, worm, or malware into the corporate network
- Using JWL/USA email lists for non-JWL/USA purposes
- Using file-sharing programs and sites, such as BitTorrent or LimeWire

### **Monitoring**

JWL/USA accepts that the use of IT resources is a valuable tool. However, misuse of this facility can have a negative impact upon productivity and the reputation of JWL/USA. JWL/USA reserves the right to police IT resources. Additionally, it is understood that JWL/USA email resources are provided for business purposes.

Therefore, JWL/USA maintains the right to examine any device, including personal computers and electronics, that is or has been physically connected to JWL/USA network, via wire or wireless link, at the Washington D.C. office and inspect any data recorded in those systems. Devices that access the network solely via *logged and user-verifiable* (VPN, RDP) means are exempted from inspection.

In order to ensure compliance with this policy, JWL/USA also reserves the right to use monitoring software and hardware to verify the use and content of emails that pass through or are stored on JWL/USA network and our network subcontractors.

### **Sanctions**

Failure to comply with these guidelines may result in disciplinary action, up to and including discharge.

### **Agreement**

All JWL/USA employees, interns, contractors or temporary staff who have been granted the right to use the Conference's network and email services will be considered to have agreed to this policy.

## **Y. Personal Background Review and Checks**

All candidates to JWL/USA employment will be required to submit to pre-

employment background checks prior to the start of their employment and also to periodic background checks, if necessary, following their appointment with JWL/USA. Failure to comply with these requirements may result in disciplinary action, up to and including discharge.

**6. TERMINATION OF EMPLOYMENT**

**A. General Policies**

Thoughtfulness at this time will reflect favorably on the employee's record and will be much appreciated.

**B. Types of Termination of Employment**

1. Resignation: Employees resign when they leave of their own accord or fail to return from scheduled sick or other leave.
2. Release: An employee might be released because of the elimination of the job under consideration, or because a grant has expired or been revoked.
3. Discharge: Since employment at JWL/USA is "at will" employees may be terminated at any time, and for any or no reason.
4. Retirement.
5. Permanent disability.

**C. Procedures**

1. Resignation: A two-week notice of intention to resign must be given to the employee's supervisor.
2. Release: If the job is being eliminated, reasonable efforts will be made to give the employee at least four weeks advance notice.
3. Discharge: See Section V.A.
4. Retirement: See Section III. C

**D. Before Leaving**

1. Upon job termination, all properties belonging to JWL/USA (keys, insurance card, job related equipment, etc.) are to be returned to the supervisor or office manager.
2. All JWL/USA property must be returned upon discharge. Otherwise, JWL/USA may take further action to recoup any replacement costs and/or seek the return of JWL/USA property through appropriate legal recourse.
3. This Handbook should be returned to the employee's supervisor.
4. JWL/USA should be notified of address changes during the calendar year in which termination occurs so that tax information may be forwarded to the proper address.

## **ADDENDUM TO HANDBOOK OF PERSONNEL POLICIES**

### ***JWL/USA & Global Statement of Values and Code of Ethics***

#### ***Personal and Professional Integrity***

All employees, board members and volunteers of JWL/USA and globally act with honesty, integrity and openness in all their dealings as representatives of the organization. JWL/USA promotes a working environment that values respect, fairness and integrity.

#### ***Mission***

JWL/USA has a clearly stated mission and purpose, approved by its corporate membership, in pursuit of the public good. All of its programs support that mission and all who work for or on behalf of JWL/USA understand and are loyal to that mission and purpose. The mission is responsive to the constituency and communities served by the organization and of value to the society at large.

#### ***Governance***

JWL/USA has an active two-tiered governing body. That is, a Board of Directors responsible for setting the mission and strategic direction of the organization and also a Global Leadership Team responsible for the oversight of the finances, operations, fundraising and policies of the organization.

The Board of Directors:

- Ensures that members of JWL/USA board of directors have the requisite skills and experience to carry out their duties and that all members understand and fulfill their governance duties acting for the benefit of the organization and its public purpose;
- Is responsible for the hiring, firing, and regular review of the performance of JWL/USA Executive President .

The Global Leadership Team:

- Ensures that the US Operation Director and appropriate employees provide the governing body with timely and comprehensive information so that the governing body can effectively carry out its duties;
- Ensures that the organization conducts all transactions and dealings with integrity and honesty;
- Ensures that the organization promotes working relationships with board members, employees, volunteers, and program beneficiaries that are based on mutual respect, fairness and openness;
- Ensures that the organization is fair and inclusive in its hiring and promotion policies and practices for all board, employees and volunteer positions;
- Ensures that policies of the organization are in writing, clearly articulated and officially adopted;
- Has a conflict of interest policy that ensures that any conflicts of interest or the appearance thereof are avoided or appropriately managed through disclosure, recusal or other means;

(See Addendum I)

- Has a whistleblower policy that encourages employees to report violations or suspected violations of JWL/USA Standard of Values and Code of Ethics described herein; (See Addendum II)
- Ensures that the resources of the organization are responsibly and prudently managed; and,
- Ensures that the organization has the capacity to carry out its programs effectively.

### ***Legal Compliance***

All employees, board members and volunteers of JWL/USA are knowledgeable of and comply with all laws, regulations and applicable international conventions during their dealings on behalf of the organization.

### ***Responsible Stewardship***

JWL/USA manages its funds responsibly and prudently as follows:

- It spends a reasonable high percentage of its annual budget on programs in pursuance of its mission;
- It spends just an adequate amount on administrative expenses to ensure effective accounting systems, internal controls, competent employees, and other expenditures critical to professional management;
- The organization compensates employees, and any others who may receive compensation, reasonably and appropriately;
- In soliciting funds, JWL/USA has reasonable fundraising costs, recognizing the variety of factors that affect fundraising efforts;
- JWL/USA does not accumulate operating funds excessively;
- JWL/USA, as required, prudently draws from its endowment fund consistent with donor intent and to support the public purpose of the organization;
- JWL/USA ensures that all spending practices and policies are fair, reasonable and appropriate to fulfill the mission of the organization; and,
- All financial reports are factually accurate and complete in all material respects.

### ***Openness and Disclosure***

JWL/USA provides comprehensive and timely information to the public, the media, and all stakeholders and is responsive in a timely manner to reasonable requests for information. All information about the organization will fully and honestly reflect the policies and practices of the organization. Basic informational data about the organization, such as JWL/USA annual report, reviews and compilations will be posted on the organization's website or otherwise available to the public. All solicitation materials accurately represent JWL/USA's policies and practices and will reflect the dignity of program beneficiaries. All financial, organizational, and program reports will be complete and accurate in all material respects.

### ***Program Evaluation***

JWL/USA regularly reviews program effectiveness and has mechanisms to incorporate

lessons learned into future programs. JWL/USA is committed to improving program and organizational effectiveness and develops mechanisms to promote learning from its activities and the field. The organization is responsive to changes in its field of activity and is responsive to the needs of its constituencies.

### ***Inclusiveness and Diversity***

JWL/USA has a policy of promoting inclusiveness and its employees, board and volunteers reflect diversity in order to enrich its programmatic effectiveness. The organization takes meaningful steps to promote inclusiveness in its hiring, retention, promotion, board recruitment and constituencies served.

### ***Fundraising***

In raising funds from the public or from donor institutions, JWL/USA ensures the truthfulness of its solicitation materials. Also, JWL/USA respects the privacy concerns of individual donors and expends funds consistent with donor's intent. JWL/USA also discloses important and relevant information to potential donors.

In addition, JWL/USA respects the rights and abilities of donors, as follows:

- To be informed of the mission of the organization, the way the resources will be used and their capacity to use donations effectively for their intended purposes;
- To be informed of the identity of those serving on the organization's governing board and to expect the board to exercise prudent judgment in its stewardship responsibilities;
- To have access to the organization's most recent financial reports;
- To be assured their gifts will be used for the purposes for which they were given;
- To receive appropriate acknowledgement and recognition;
- To be assured that information about their donations is handled with respect and with confidentiality to the extent provided by the law;
- To expect that all relationships with individuals representing organizations of interest to the donor will be professional in nature;
- To be informed whether those seeking donations are volunteers, employees of the organizations or hired solicitors;
- To have the opportunity for their names to be deleted from mailing lists that an organization may intend to share; and,
- To feel free to ask questions when making a donation and to receive prompt, truthful and forthright answers.

## **ADDENDUM TO HANDBOOK OF PERSONNEL POLICIES**

### ***Conflict of Interest Policy***

The standard of behavior at JWJL/USA & globally is that all employees, volunteers, and board members scrupulously avoid any conflict of interest between the interests of JWJL/USA on one hand, and personal, professional, and business interests on the other. This includes avoiding actual conflicts of interest as well as perceptions of conflicts of interest. It would be impracticable to attempt to list all possible conflict of interests' situations, however I understand that the purposes of this policy are: to protect the integrity of JWJL/USA's decision-making process, to enable our constituencies to have confidence in our integrity, and to protect the integrity and reputation of volunteers, employees and board members. Upon or before election, hiring or appointment, I will make a full, written disclosure of interests, relationships, and holdings that could potentially result in a conflict of interest. This written disclosure will be kept on file and I will update it as appropriate. In the course of meetings or activities, I will disclose any interests in a transaction or decision where I (including my business or other nonprofit affiliation), my family and/or my significant other, employer, or close associates will receive a benefit or gain. After disclosure, I understand that I will be asked to leave the room for the discussion and will not be permitted to vote on the question. I understand that this policy is meant to be a supplement to good judgment, and I will respect its spirit as well as its wording.

## **ADDENDUM TO HANDBOOK OF PERSONNEL POLICIES**

### ***Whistleblower Policy***

#### ***General***

JWL/USA Statement of Values and Code of Ethics (“Code”) requires Board of Directors, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of JWL/USA, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

#### ***Reporting Responsibility***

It is the responsibility of all Board of Directors, employees and volunteers to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

#### ***No Retaliation***

No Director, employee or volunteer who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the organization prior to seeking resolution outside the organization.

#### ***Reporting Violations***

The Code addresses the organization’s policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee’s supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor’s response, you are encouraged to speak with someone in JWL Global Leadership Team or anyone in management whom you are comfortable in approaching. Supervisors and managers are required to report suspected violations of the Code of Conduct to the Organization’s Chief Operation Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following the policy describe above, individuals should contact the Chief Operation Officer directly.

#### ***Compliance Director***

The Organization’s Compliance Director is the Chief Operation Officer and is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at his discretion, shall advise the JWL Global Leadership Team and is required to report to the Board of Directors at least annually on compliance activity.

#### ***Accounting and Auditing Matters***

The Chief Operation Officer shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing to the board of directors and will immediately work with the board until the matter is resolved.

### ***Acting in Good Faith***

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

### ***Confidentiality***

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

### ***Handling of Reported Violations***

The Chief Operation Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

## **ADDENDUM TO HANDBOOK OF PERSONNEL POLICIES**

### ***Code of Conduct***

#### ***INTRODUCTION***

JWL is an international Catholic agency that provides higher education learning opportunities to those living at the margins of societies, including to refugees and other forcibly displaced persons around the world. Our mission, to provide equitable high quality tertiary learning to people and communities at the margins of societies - be it through poverty, location, lack of opportunity, conflict or forced displacement – so all can contribute their knowledge and voices to the global community of learners and together foster hope to create a more peaceful and humane world. This mission is built on a faith in God who is present in human history, even in its most tragic moments. All our work is inspired by this faith and by the following core values:

- **Compassion, love and hope**
- **Competence, open mindedness and honest engagement with reality**
- **Commitment and service**
- **Communities of learners, inclusive and diverse, global and local**
- **Conscience for justice and social responsibility**
- **Collaboration**
- ***Cura personalis*, care and respect for the entire person, dignity and freedom**
- **Creativity**
- **Critical and transformative thinking**

#### **SCOPE**

JWL recognizes that its team members are men and women of high integrity whose actions reflect the core values that underlie the Code of Conduct. It is, however, important for all who work for JWL to understand clearly that the highest standard of conduct is expected of them in order to ensure the protection of and care for the people with whom JWL works. This code applies to all those associated with JWL, including paid staff, volunteers, board members, consultants and third-party contractors.

## **CODE OF CONDUCT**

### **A. Professional Behavior**

As a team member of JWL, I commit myself to:

1. Undertake my duties as a JWL team member conscientiously and in keeping with the organization's values and its mission to accompany, serve and defend the rights of refugees and other forcibly displaced persons as well as any persons living at the margins of society.
2. Uphold and promote the highest standards of ethical and professional conduct in carrying out my assigned duties in the workplace and in my life outside the official work environment. Furthermore, I will endeavour to represent and further the values and mission of JWL to the best of my ability.
3. Avoid any public statement which may unnecessarily reflect poorly on the name and reputation of JWL.
4. Maintain the highest degree of confidentiality in professional matters.
5. Receive clear instructions and approval from the Executive President or Vice President Academics and Research or Communication Director before taking part in any publication, research, communications or media task associated with my work for JWL.
6. Never use JWL communication equipment or premises (e.g., phones, computers, e-mail, etc.) to transmit harassing, abusive, sexually explicit, racially or ethically offensive, or defamatory material.
7. Display at all times equal respect for all persons regardless of their race, gender, religion, colour, national or ethnic origin, language, sexual orientation, age, socio-economic status, political conviction, or any other distinguishing features.
8. Help create and maintain a work environment which prevents sexual exploitation and abuse.
9. Facilitate open and honest communication within JWL.
10. Help create a healthy and positive working environment that allows and encourages all team members to work harmoniously even through challenging and stressful times.
11. Follow all JWL Policies as implement by the Organizations during my time of employment.

### **B. Personal Behavior**

As a team member of JWL, I commit myself to:

1. Respect all local laws in the country where I am working and honour my private legal obligations.
2. Abide by the principles of Protection from Sexual Exploitation and Abuse in a Humanitarian Crisis, articulated by the Inter-Agency Standing Committee (IASC), which prohibit acts of sexual exploitation and abuse, and call for particular responsibility and care towards children and vulnerable adults. I

- understand that any proven case of exploitation and abuse, whether of a sexual or non-sexual nature, is grounds for immediate dismissal.
3. Follow JWL's Safeguarding Policy for the Protection of Children and Adults at Risk that prohibits sexual activity with children (persons under the age of 18) regardless of the age of majority or the age of consent locally or with vulnerable adults as described in the policy. Mistaken belief in the age of a child does not serve as a defence for such behaviour.
  4. Recognise that sexual relationships between JWL workers and the people they serve, regardless of age, are strongly discouraged since they may be based on inherently unequal power dynamics.
  5. Report when concerns or suspicions regarding sexual abuse or exploitation by a fellow JWL worker arise, whether in a JWL environment or elsewhere.
  6. Adhere to JWL's strict prohibition against possessing or being under the influence of illegal substances either within or outside the workplace environment. The same prohibition applies for being under the influence of alcohol in the workplace or while representing JWL.
  7. Never bring offensive weapons to the workplace or carry them while conducting JWL work or representing JWL which is grounds for dismissal, unless approval is clearly stated in one's job description (e.g., guards).
  8. Respect JWL position on prohibition of any threat or act of violence, physical or verbal, either within or outside the workplace environment. Any substantiated case, will result in disciplinary sanction.
  9. Behave in a way that does not jeopardize my security or the safety of my team.
  10. Ensure that my conduct neither reflects negatively on JWL nor impacts nor undermines my or others' ability to undertake the role for which I am employed.

### **C. Conflict of Interest, Coercion and Corruption**

#### Furthermore, I agree to:

1. Avoid activities outside the formal work setting (e.g., additional time-consuming employment or volunteer work) that would create a conflict of interest with my JWL duties and responsibilities or detract in any way from my JWL work assignments.
2. Not create business relationships between JWL and members of my own extended family or friends or any private businesses in which I have a financial interest that may lead to a conflict of interest. If I become aware of a potential conflict of interest, I must immediately discuss this matter with my supervisor.
3. Neither offer to nor accept from the people JWL serves, from partners or contractors any favors, bribes or other forms of personal enrichment under any circumstances. Small tokens of appreciation may be offered or received, but I must inform my supervisor of any such gifts.
4. Neither seek nor accept instructions from any other authority external to JWL that could jeopardize the scope or implementation of JWL's work.
5. Be accountable for the property and funds of JWL entrusted to me and to those whom I supervise in JWL. I understand that, if I am proven to have been

- involved in theft or fraud or if I have mishandled JRS assets, funds or records, I will be liable to pay compensatory damages and will be subject to dismissal.
6. Report behaviors of other staff when I have reasonable suspicion of breaches of the standards of the Code of Conduct.
  7. Refrain from the exchange of money, employment, goods, or services for sex, including sexual favors. All other forms of humiliating, degrading or exploitative behaviors are strictly prohibited (IASC PSEA, Principle 3).

I have carefully read this JWL Code of Conduct, and having discussed its contents with my supervisor, I have had time to become familiar with the relevant documents. I am committed to JWL's mission and mandate, and I am aware that JWL expects me to uphold the standards of behavior described in this Code of Conduct.

**I realize that any breach of the Code of Conduct can and may result in the discharge from my employment.**

***Receipt of Employee Handbook, Safeguarding Policy and Employment-  
At-Will Statement***

I hereby certify that I have received a copy of the July 2017 edition of the JWL/USA Employee Handbook of Personnel Policies, that I have read the Handbook, and that I agree to abide by the policies contained therein. I understand that it sets forth the terms and conditions of my employment as well as the duties, responsibilities and obligation of employment with JWL/USA. I understand and agree that it is my responsibility to read the Handbook and to abide by the rules, policies and standards set forth in the Handbook.

I also acknowledge that my employment with JWL/USA is not for a specified period of time and can be terminated at any time for any reason, with or without cause or notice, by me or JWL/USA, except where state law dictates otherwise. I acknowledge that no oral or written statements or representations regarding my employment can alter the foregoing. I also acknowledge that no manager or employee has the authority to enter into an employment agreement- express or implied - providing for employment other than at-will, unless those agreements are in a written contract signed by the JWL/USA Board.

I also acknowledge that, except for the policy of at-will employment, JWL/USA reserve the right to revise, delete, and add to the provisions of this Handbook. All such revisions, deletions, or additions must be in writing and must be signed by the US Operation Director of JWL/USA.

No oral statements or representations can change the provisions of this Handbook.

I also acknowledge that, except for the policy of at-will employment, terms and conditions of employment with JWL/USA may be modified at the sole discretion of JWL/USA, with or without cause or notice, at any time. No implied contract concerning any employment related decision, term of employment or condition of employment can be established by any other statement, conduct, policy, or practice.

I hereby certify that I have received a copy of the JWL Code of Conduct, JWL/USA Statement of Values and Code of Ethics, Conflict of Interest Policy and Whistleblower Policy, that I have read and understood each of these documents, and that I agree to abide by the policies contained therein.

If I have questions regarding the content or interpretation of this Handbook, I will bring them to the attention of the Human Resources Director.

Name \_\_\_\_\_ *Signature* \_\_\_\_\_

*Date* \_\_\_\_\_