

ASSOCIATE HANDBOOK



VERITAS
HEALTHCARE GROUP

Issued: February 1, 2022



VERITAS
INCARE



VERITAS
SENIOR LIVING

Handbook Reviewed and Updated February 1, 2022

There are several things to keep in mind about this handbook. First, it contains general information and guidelines supported by the Veritas policies and procedures (available on website and printed copy) and is subject to change at the discretion of Veritas. It is not intended to be comprehensive or to address all the possible applications of, or exceptions to, the general policies and procedures described. For that reason, if you have any questions concerning eligibility for a particular benefit or the applicability of a policy or practice to you, communicate your specific questions to the Executive Director (ED) or VP of Administration.

Neither this handbook nor any other Veritas policy confers any contractual right, either expressed or implied, to remain in the employment of Veritas. Nor does it guarantee any fixed terms and conditions of your employment. Your employment is not for any specific time and may be terminated at will with or without cause and without prior notice by Veritas, or you may resign for any reason at any time. No supervisor or other representative of Veritas (except the CEO/President/Owner) has the authority to enter into any agreement for employment for any specified period of time or to make any agreement contrary to the above.

The procedures, practices, policies and benefits described here may be modified or discontinued from time to time. The ED or VP of Administration will inform you of any changes as they occur. You will be required to sign an acknowledgment that you have received, understand, and will comply with any changes.

If you have any questions about this Handbook or need further information about any subject, consult with the ED or VP of Administration.

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Welcome to Veritas!

Dear Associate:

I want to personally welcome you to the Veritas team. I hope that you will find your work satisfying and rewarding.

This Associate Handbook includes policies and procedures which will help you get off to a good start with some expectations of your employment. It serves as a review of the personnel policies and procedures that will govern your employment. More detailed policies and procedures are retained on our website, www.veritashcg.com under the “Veritas Administration” tab, and printed copies are available at your community upon request. You are welcome to review all policies and procedures.

As an Associate of this community you are now a member of an important team. The effective operation of this community depends on the respect and compassion it’s extends to the community's residents. I would like to share with you information about Veritas, our mission and philosophy of care.

‘Veritas` (meaning `truth`) – Veritas was founded in 2007. Our goal is to develop and manage quality-driven senior communities, providing the amenities that they deserve and services they desire. We want to create an atmosphere where their new home is an extension of their families; where their independence, security and comfort are nurtured by caring professionals – which is you.

The mission of Veritas is simple; to provide a satisfying living experience to everyone that calls a Veritas community their home.

Our Core Values are more than just “Corporate Speak”; they are the common essentials that you, our Associate’s demonstrate in their commitment to our residents. While other companies publish a litany of values, we feel that Caring, Passion and Respect are the vital ingredients in what we do and what our residents deserve.

Caring ... Many companies can assist with the activities of daily living (ADLs), while Veritas communities reach beyond those daily needs and endeavor to enrich the quality-of-life of every resident, through individualized social, spiritual, and physical attention.

Passion ... Our Associates are carefully selected, assuring they possess the heart, spirit and compassion that our residents deserve and demand. Our Associates take pride in what they do and are driven in making a difference in our resident’s lives. We are passionate about what we do!

Respect ... Our respect for our Residents, our fellow Associates, our Company, and our Communities motivate us to be the best we can be.

Our philosophy of care and goal at each Veritas Community is to provide the highest quality-of-life possible for each of our residents. We strive to consistently deliver services at a level that all can be proud of. We believe each of our residents is an individual – no Cookie Cutter approaches. We believe in the sanctity of resident rights with CHOICE being core to our care processes. Our main objective is to be an advocate for each of the residents that live in our communities. Maintaining and attaining resident independence drives our clinical processes. Collaboration with families, residents, medical professionals is imperative to our mission. Providing opportunities for our residents to exercise their mental, physical, social and spiritual selves is core to every interaction. At Veritas, our residents truly come first!

As a team and as individuals, we have an extremely important role to perform in this community. Every job position is a part of this team. By diligent efforts on the part of each Associate and by cooperating in the team approach, we will succeed in our endeavor.

It is the policy of this community and Veritas to hire the best qualified applicant available for each position and to promote, when possible, those who have best performed their duties and fulfilled their responsibilities. We are an equal opportunity employer; both hiring and promoting is done without consideration of race, sex, color, religion, age, national origin, veteran status or handicap.

The policies and procedures herein shall apply to all Associates and serve as a guide for your future employment with us. They explain the community's policies and benefits, what is expected of the Associates and what the Associate can expect of the community.

Detailed job descriptions for the individual Associate, together with job classifications and responsibilities, are provided by the community at the time of employment.

If you need any point clarified or explained, you are encouraged to talk with your supervisor.

Once again, welcome!

J. Christopher Landers

CEO/President and Owner

Compliance with Federal & State Regulations

Employment at Veritas is based upon persons who meet screening requirements, licensure/certification requirements for particular professional positions (and remain in good standing there under), and who meet their job description duties consistently based on their level of education, training, preparation, and experience.

Veritas complies with all applicable federal and state regulations. And, the state specifications (form or guideline or regulation) will substitute Veritas policy and procedure when the state specification requires a higher standard. For more information, consult the state-specific form or guideline or regulation.

No Veritas policy or disciplines created in this handbook is designed, intended, or enforced in a manner to curtail any concerted protected activities under Section 7 of the National Labor Relations Board (NLRB) employee rights.

For more information on compliance, see the Appendix B of this handbook.

General Information for Employment

Application & Employment Process

As positions become available within each Veritas community and prior to recruitment, in collaboration with the VP of Administration, Executive Director (ED) or designee will determine if the position will be posted internally, externally or a combination. While career development is always a consideration the prevailing consideration is what skill set best serves the Veritas community.

Prospective associates are selected through an onboarding process which includes application, personal interviews, background/reference checks and drug screening. The ED and/or designee oversees the process and assures that department designees comply with all pre-employment forms, benefit applications, and enrollment forms; having their picture taken for personnel records; and providing policies and procedures; and completing associate orientation within the first thirty (30) days of employment.

Any false information provided on the application and/or during the application process will result in disciplinary actions including immediate termination, and ineligibility for future employment consideration.

Offer Letter

The VP of Administration completes the offer letter with a job description for the ED, RCD, regional management, Home Office staff, and others as requested. The ED or designee provides an offer letter with a job description to all other prospective new hires.

- The prospective new hire identifies their acceptance by signing the job description and offer letter, and returning each to the ED or designee who then makes a copy for the new hire and places a copy in their personnel file.
- The offer letter is contingent on the candidate completing the onboarding process and successfully passing all reference and background checks.
- The hire date also known as date of hire (DOH) is the month/date/year that the associate begins work. This date is also used to mark the associate's anniversary with the company (subject to adjustment for the portion of any future leave of absence in excess of thirty (30) days).

Employment At-Will

Associates of Veritas do not have a written employment contract of specific terms and are employed at the will for an indefinite period. The employment at-will relationship is one created and maintained by the continuing will of the associate and the employer and that either party, regardless of the date of payment of wages, performance evaluations or longevity of employment, remains free to end the employment relationship, with or without cause, at any time without prior notice, unless otherwise prohibited by law.

None of Veritas' policies may be construed to create a contract of employment or any other legal obligation, express or implied, and any policy may be amended, revised, supplemented, rescinded or otherwise altered, in whole or part, at any time at the sole and absolute discretion of Veritas.

Job Description

Job descriptions are established and maintained by the VP of Administration for each associate position. The associate's supervisor and/or the ED will review the job description annually with the associate to assure that each job description is accurate. The job description is utilized when evaluating the associate and/or a performance improvement plan (PIP).

Probationary Period

Each new associate is scheduled for a probationary period which is a period of adjustment in order to learn about Veritas and about their job. During this time, the associate has the opportunity to find out if they are suited to, and will enjoy their job description, responsibilities and tasks. During this time the associate's supervisor or designee is also provided a time to evaluate if the new associate's performance is satisfactory and/or progressing satisfactorily.

The probationary period is generally ninety (90) days; however, it can be less or it can be extended as described below.

- At any time during the probationary period, if the new hire is found not to be suited for the position, the probationary period ceases and the associate is terminated.
- If the supervisor requests that the probationary period be extended and the ED approves, the probationary period can be extended up to four (4) additional weeks. Any extension of the original 90-day probationary period revises the eligibility date for group benefits and/or perks.
- As is true at all times during employment (both during and after the probationary period), the supervisor in conjunction with the ED may terminate employment at will, with or without cause or without prior notice.

During the probationary period the following are the minimum goals to achieve:

1. Establish appropriate associate-employer communication/rapport/teamwork/work schedule compliance;
2. Review job description, responsibilities, and tasks;
3. Conduct tour of the community and work areas;
4. Present an overview of the Veritas culture, history, goals and expectations;
5. Provide information for associate benefits and eligibility parameters;
6. Answer any questions from the associate.
7. Complete the New Associate Orientation Documentation Form for each associate (HR Form 100-22-A).

Associate Classification and Categories

All associates are designated as either nonexempt or exempt in compliance with state and federal wage and hour laws. The following is intended to help associates understand employment classifications and categories with respect to their employment status and benefit eligibility. These classifications do not guarantee employment for any specified period of time. The right to terminate the employment-at-will relationship at any time is retained by both the associate and Veritas.

Associate Classifications

Nonexempt associates are associates whose work is covered by the Fair Labor Standards Act (FLSA). They **are not** exempt from the law's requirements concerning minimum wage and overtime. These associates receive overtime pay for hours worked over forty (40) hours per work week. Examples of Veritas nonexempt associates include

Resident Assistant (RA) who are unlicensed, Sr. Resident Assistant (CNA, Medical Assistant, Medical Technician), Shift Nurse, Dietary Staff, Maintenance staff, and Administrative Staff.

Exempt associates are generally managers or professionals, administrative or technical staff who **are exempt** from overtime provisions of the FLSA but have a minimum annual salary set by FLSA. Exempt associates hold jobs that meet the standards and criteria established under the FLSA by the U.S. Department of Labor. These are salaried and do not receive overtime pay. Examples of Veritas exempt associates include the ED, Resident Care Director (RCD), Regional and Home Office staff.

Associate Categories

- **Regular, full time:** Associates who are not in a temporary status and who are regularly scheduled to work the full-time schedule of at least 30 hours per each week during a calendar year (JAN – DEC). Generally, these associates are eligible for the full benefits package, subject to the terms, conditions and limitations of each benefits program. These associates receive a W-2.
- **Regular, part time:** Associates who are not in a temporary status and who are regularly scheduled to work less than 30 hours per each week, but at least 16 hours per week during a calendar year (JAN – DEC). Regular, part-time associates are eligible for some of the benefits offered by Veritas subject to the terms, conditions and limitations of each benefits program. These associates receive a W-2.
- **Temporary/PRN:** Associates who are hired as interim replacements in a calendar year (JAN – DEC) or to temporarily supplement the workforce or to assist in the completion of a specific project and who are temporarily scheduled to work for a limited duration and/or less than 16 hours per week. Employment beyond any initially stated period does not in any way imply a change in employment status. Temporary/PRN associates are not eligible for benefits offered by Veritas. These associates receive a W-2.
- **Contract:** Independent contractors (staff who are not “associates”) who are hired by the CEO/President/Owner or designee as interim replacements or to temporarily supplement the workforce or to assist in the completion of a specific project and who are temporarily scheduled to work for a limited duration. Engagement beyond any initially stated period does not in any way imply a change in status. These independent contractors receive a 1099.

NOTE: Once employed, an associate’s category cannot be revised without approval from the VP of Administration or designee. Requests for a category change require the completion of the BO Form 200-4A&B (PR Action/Status Change).

Associate Personnel Files

The associate personnel files of each Veritas community are maintained by the ED or designee and are considered confidential. The associate’s supervisor may only have access to personnel file information on a need-to-know basis.

A supervisor considering the hire of a former associate or transfer of a current associate may be granted access to the file, or limited parts of it.

Personnel file access by current associates and former associates upon request will generally be permitted within three days of the request unless otherwise required under state law. Personnel files are to be reviewed in the ED’s office and/or designated office. Personnel files may only be removed from community premises for archival purposes. Copies, if requested, can only be made by the ED or designee.

Representatives of government or law enforcement agencies, in the course of their duties, may be allowed access to review and received appropriate file information.

Background and Reference Checks

Veritas conducts background and reference checks on all prospects for hire and/or all new associates to ensure that individuals who join Veritas are well qualified. Background checks may include verification of any information on the applicant's resume or application form. Applicants who provide false information will be eliminated from consideration of employment. Associates who provided false information will be subject to disciplinary action including termination and become ineligible for rehire.

All offers of employment are conditioned on the completion of the onboarding process and receipt of a background check report that is acceptable to Veritas. All background checks are conducted in conformity with the Federal Fair Credit Reporting Act and state and federal privacy and antidiscrimination laws. Reports are kept confidential and are only viewed by individuals involved in the hiring process.

If information obtained in a background check would lead Veritas to deny employment, a copy of the report will be provided to the applicant, and the applicant will have the opportunity to dispute the report's accuracy. Background checks will include a criminal record check. Some criminal convictions do not automatically bar an applicant from employment. Contact the VP of Administration for additional information.

Additional checks such as a driving record or credit report may be required on applicants for particular job categories if appropriate and job related.

Veritas also reserves the right to conduct a background check for current associates to determine eligibility for continued employment, promotion or reassignment in the same manner as described above.

Medical/Drug Testing

Veritas may require applicants and/or associates to undergo medical tests or examinations and/or drug and alcohol tests at testing centers designated by the ED or designee at any time.

- For applicants, this screening is a requirement for the conditional offer of employment and must be completed within 24-hours of the conditional offer. If the applicant does not timely complete the screening or fails the screening, the offer of employment is rescinded, and the applicant is removed from future consideration.
- For a current associate, this screening is a requirement based on the observations of their supervisor and/or other staff in conjunction with the ED or designee, and must be completed within six (6) hours of the screening notice. The supervisor, ED or designee will transport the associate to the screening center and back to the Veritas community.
 - Upon return to the Veritas community, the associate will be directed to exit the premises until the test results are available and the ED or designee contacts the associate with results.
 - If the associate is hourly/non-exempt they will clock-out before leaving the premises.
 - During suspension, the associate is prohibited from the premises or speaking residents/resident families or staff other than the ED or supervisor or designee until instructed otherwise.
 - If the associate fails to pass the screening, disciplinary actions including up to termination can occur.
 - If the associate refuses the screening, the associate is immediately terminated.
 - If the associate passes the screening, the ED in conjunction with the supervisor and/or designee will arrange for the associate to resume their schedule, and will also arrange the appropriate credit for any loss-hour pay back to the associate.

- Drug screenings are required for any workplace accident/worker compensation claim.
- At the time of the screening and if a positive result is received, associates will be provided a notice of their rights to the extent required by state law.

Internal Transfers/Promotions

Each Veritas community is an advocate of promoting from within and may consider current associates with the necessary qualifications and skills to fill vacancies above the entry level, unless outside recruitment is considered to be in the community's best interest. The ED or designee may initiate transfers of associates between departments and/or in collaboration with other Veritas communities to meet specified work requirements and reassignment of work requirements.

The following criteria are used to consider an internal transfer or promotion:

- Associates with twelve (12) months or more of continuous service may request consideration to transfer to another position as a vacancy become available and will be considered along with other applicants.
- Associates must have a satisfactory performance record.
- Associates must not have disciplinary actions and/or performance improvement plan (PIP) in force during the last 12 months.
- Internal transfers/promotions can occur when the skill set required is met or exceeded, and when in the best interest of the Veritas community is served.

Nepotism, Employment of Relatives and Personal Relationships

Each Veritas community assures that we do not create situations such as conflict of interest or favoritism (see Code of Ethics). This extends to practices that involve associate hiring, promotion, transfer, supervision, and residency.

- Close relatives are defined as husband, wife, father, mother, father-in-law, mother-in law, grandfather, grandmother, son, son-in-law, daughter, daughter-in law, uncle, aunt, nephew, niece, brother, sister, brother-in-law, sister-in-law, step relatives, cousins, and/or anyone that lives in the same household of the associate.
 - Close relatives or those in a dating/personal relationship or members of the same household are not permitted to be in positions that have a reporting responsibility to each other.
- Any associate that begins/ends or is currently in a dating/personal relationship with another associate or a resident/resident family member or becomes a relative or lives in the same household (temporary or long-term) with another associate or resident family member must inform their supervisor(s) and the ED on a timely basis.
 - The ED will then contact the VP of Administration for guidance.
 - Veritas reserves the right to apply this policy to situations where there is either a substantiated conflict or a potential conflict regardless of direct-reporting relationship or authority involved.

Employment of Minor

The employment of minors (anyone 17 years old or less) is restricted by the terms and conditions of state and federal Wage and Labor Laws which require a Work Permit.

In addition to the above, written permission from the parent/guardian of the minor must be on file.

Progressive Discipline

Each Veritas community supports the use of progressive discipline to address issues such as poor work performance or misconduct to correct the problem, prevent recurrence of the undesirable behavior and/or performance issue, and prepare for satisfactory service in the future. Progressive discipline has been designed consistent with resident care and safety, our organizational values, human resource best practices and employment laws to help treat all associates fairly and be sure that disciplinary actions are prompt, objective, and impartial.

Outlined below are the steps of our progressive discipline policy and procedure. Veritas reserves the right to combine or skip steps in this process depending on the facts of each situation and the nature of the offense. The level of disciplinary intervention may also vary. Some of the factors that will be considered are whether the offense is repeated despite coaching, counseling and/or training; the associate's work record; and the impact the conduct and performance issues have on our organization such as putting a resident or fellow associate at risk, and/or non-compliance with policies/procedures and state regulations, and/or adversely affects Veritas.

General Definitions of Progressive Discipline

- **Verbal warning (First Warning):** A supervisor or designee verbally counsels an associate about an issue of concern and utilizes the Note to File Form to provide a written record that the issue was addressed and the associate is aware that the behavior/issue should not reoccur. This process is used as an educational opportunity to provide notice and training/re-training. The supervisor updates the ED on the verbal warning/Note to File. A copy of the Note to File is provided to the associate and placed in the associate's file for future reference.
- **Written warning (Second Warning to Final Warning):** Written warnings are documented via the Disciplinary Action Form (DAF) for behavior/issues or violations that are considered serious or in situations when the first warning (verbal warning/Note to File) has not helped change unacceptable behavior/issue. Written warnings are placed in an associate's personnel file. An associate must recognize the grave nature of the written warning. The supervisor must consult with the ED prior to issuing the written warning.
- **Performance improvement plan (PIP):** Whenever an associate has been involved in a disciplinary situation that has not been readily resolved or when they have demonstrated an inability to perform assigned work responsibilities effectively, the associate may be given a discharge warning and/or placed on a performance improvement plan (PIP). PIP status will last for a predetermined amount of time not to exceed 90 days. Within this time period, the associate must demonstrate a willingness and ability to meet and maintain the conduct and/or work requirements as specified by the supervisor and the community. At the end of the predetermined time, the PIP may be closed or, if established goals are not met, further discipline including up to termination may occur.

PROGRESSIVE STEPS DEFINED:

The ED in collaboration with the VP of Administration or designee reserves the right to determine the appropriate level of discipline for any inappropriate conduct, including verbal and written warnings, suspension with or without pay, PIP, demotion, or termination of employment.

STEP 1 — First Notice (Verbal Warning/Note to File) — When the supervisor observes or is made aware of an inability or unwillingness to perform the job properly, they check the facts and then discuss the problem privately with the associate. This must be done with a sense of urgency, and the Note to File Form, HR Form 100-10-A, must be completed and filed in the personnel file. The supervisor will help the associate understand what is wrong, what is expected, and obtain agreement that the problem will not occur again. The progressive discipline process and the consequences of inadequate performance will be explained. A copy of the form is provided to the associate and placed in the associate's personnel file.

STEP 2 — Second Notice — More serious than the first notice, this step is recorded on the Disciplinary Action Form (DAF), HR Form 100-13-A, must be completed and placed in the personnel file. When performance continues to be unsatisfactory, or if the problem is of a serious and urgent nature, the DAF will state the consequences if the problem is not solved — further disciplinary action which can include suspension and/or termination. The supervisor will monitor the progress to ensure the problem has been resolved. The associate will be asked to provide their statement and sign the DAF. The signature does not indicate agreement with the content of the DAF, only that the issue has been presented to the associate. Another supervisory person will be present to witness the meeting. The associate will be given a copy of the DAF.

STEP 3 – Final Notice – This is the last step before punitive action is taken when any systemic performance issue continues. The supervisor assures that another supervisory staff is present to witness the DAF. The supervisor will inform the associate that further disciplinary action will include a Discharge Warning and/or Discharge from Employment. As with the Second Notice, the associate may provide their comments on the DAF and then they will sign and date the form. A copy of the DAF will be provided to the associate, and the DAF will be placed in the associate’s personnel file.

STEP 4 — Discharge Warning — If performance continues to be unsatisfactory, or if the problem is of a serious and urgent nature, the next step involves counseling with a written report and witness as in the previous steps, but also a suspension from duty without pay. (Some EDs prefer to pay the associate for the day. Giving the message that it is a very serious problem, Veritas wants the associate to carefully consider whether they intend to correct the issue or would prefer to leave Veritas employment — then this is called a “paid decision-making day.”) A discharge warning that includes suspension with pay will not exceed one (1) day, while suspensions without pay will not exceed three (3) days. Suspension is a serious move, and by now the associate should have been clearly told and should understand that their continued employment is in serious jeopardy.

STEP 5 — Discharge from Employment — There are times when an associate is unable or unwilling to achieve satisfactory performance, or when their actions require termination. The DAF and a witness will be required as in previous steps.

By using progressive discipline, Veritas hopes that most associate problems can be corrected at an early stage, benefiting both the associate and the company, and in the end benefiting the resident.

CATEGORIES OF INFRACTIONS AND PROGRESSIVE STEPS

Class I: These are normally lesser breaches of policy which can be simply corrected without serious disciplinary measures. Example of Class I (but not limited to) are:

1. Failure to comply with code (policy, procedure, regulations, law, etc.).
2. Minor disruptive, unruly behavior, or carelessness on Company premises.
3. Improper or wasteful use of equipment and/or supplies.
4. Minor infraction of Company safety rules (policy, procedure, regulations, law etc.).
5. Minor disrespect to any supervisor.
6. Not attending mandatory training, meeting, or other required function.
7. Smoking and/or use of any tobacco or vaping product in non-designated areas.
8. Being away from assigned duties without authorization (which includes tardiness, leaving early or unexcused absence).

9. Failure to follow proper call-in procedure.
10. Working unauthorized overtime.
11. HIPAA violation.

Class I: Progressive Disciplinary Action:

- First Offense: First Notice
- Second Offense: Second Notice
- Third Offense: Final Notice
- Fourth Offense: Discharge Warning
- Fifth Offense: Discharge from Employment

Class II: These are critical breaches of policy which can be corrected with serious disciplinary measures. Example of Class II (but not limited to) are:

1. Behavior or misconduct or failure to adhere to policies/procedures which results in repairable damage to property or minor/moderate injury to person.
2. Conduct engaging in disruptive behavior or interaction that could interfere with the workplace or adversely impact the quality of resident care. (i.e., shouting, yelling, screaming, threatening violence, or inappropriate physical conduct).
3. First occurrence of non-compliance with infectious disease control policy/procedure/regulations/law, etc.
4. Failure to report to the supervisor an on-the job accident or injury.
5. Use of profane, obscene, vulgar or abusive language.
6. Deliberate failure to perform duties.
7. Accepting gratuities or gifts of any kind from residents, families or visitors.
8. Disobeying a supervisor's directive or instructions.
9. Violations of Resident's Rights.
10. Repeated excessive personal phone calls during non-break periods.
11. Repeated HIPAA or serious violation of HIPAA policies and procedures.

Class II Progressive Disciplinary Action:

- First Offense: Final Notice
- Second Offense: Discharge Warning
- Third Offense: Discharge from Employment

Class III: These are breaches of policy which justify immediate Discharge from Employment, but are not limited to:

1. Theft or willful destruction or damage of property.
2. Behavior or misconduct or failure to adhere to policies/procedures which results in permanent damage to property or critical injury or death to person.
3. Continued occurrence of non-compliance with infectious disease control policy/procedure/regulations/law, etc.
4. Falsification of any document.
5. Disorderly conduct or fighting on Veritas premises or while conducting Veritas business, resulting in injury to any individual or major property damage.
6. Unauthorized removal of any records or unauthorized giving out of confidential information on co-workers or residents.
7. Under the influence of **or** in the possession of alcoholic beverages or illegal drugs.
8. Sleeping during assigned duty hours.
9. Departing the community without being relieved by replacement staff.
10. Being in possession of weapons or bringing weapons onto Veritas premises.
11. Harassment of any form (See Appendix C).
12. Verbal, emotional, and/or physical abuse/neglect to a resident that has been substantiated by an investigation.
13. Negligence in the performance of one's job that is detrimental to the orderly and ethical operation of the business.
14. Unauthorized access, dissemination, tampering and/or destruction of Veritas data.

DISCIPLINARY ACTION FORM (DAF) RETENTION

Personnel Files will be reviewed annually and the following deletions will be made:

1. Class I DAFs will be purged annually on the associate's anniversary date if the associate's performance has improved and the progressive disciplinary process has been halted.
2. Class II DAFs will be purged every two years on the Associate's anniversary date.
3. Class III DAFs will be retained indefinitely.

Separation of Employment

Separation of employment from Veritas can occur for several different reasons. The most common are listed below.

- **Resignation:** Although we hope your employment with us will be a mutually rewarding experience, we understand that varying circumstances cause associates to voluntarily resign employment. Resigning associates are encouraged to provide notice, preferably in writing, to facilitate a smooth transition out of the Veritas community.
 - All associates which are non-exempt are asked to provide a two (2) week notice. If the associate provides less notice or no notice, the associate forfeits accrued unused PTO, and Veritas may deem the individual to be ineligible for rehire depending on the circumstances.
 - All associate which are exempt are asked to provide a thirty (30) day notice. If the associate provides less notice or no notice, Veritas may deem the individual to be ineligible for rehire depending on the circumstances.
 - Due to the needs of the community and/or the behavior of the associate, Veritas may make the resignation effective at any time during the notice period and the associate is paid through their last day at work.
- **Retirement:** Regular full-time associates who wish to retire are required to notify their supervisor, their ED, and the VP of Administration in writing at least ninety (90) days before the planned retirement date. It is our practice to provide special recognition of associates at their retirement.
- **Job abandonment:** Associates who are absent from their assigned shift (...i.e., fail to report to work) and/or fail to contact their supervisor (who are absent from their assigned shift), for three (3) consecutive work days are considered to have abandoned the job without notice effective at the end of their normal shift on the third day. The associate's supervisor notifies the ED at the expiration of the third work day and initiates the paperwork to terminate the associate's employment. Associates who are separated due to job abandonment are ineligible for rehire and are reported to the appropriate state agency.
- **Termination:** Associates of Veritas are employed on an at-will basis, and Veritas retains the right to terminate an associate at any time.

Exit Interview

Veritas requests that the separating associate complete an Exit Interview (using HR Form 100-13-D) with the ED or designee before leaving employment. This is a good time to document any comments from the separating associate and to also confirm mailing address information for upcoming W-2, confirm that all Veritas property and associate's personal property is accounted for, and to answer any questions from the associate. The ED sends the Exit Interview to the VP of Administration and the associate's Supervisor for review and appropriate discussion/reporting/etc. See *Appendix I* for a sample of the Exit Interview Form.

Return of Veritas Property

The separating associate must return/provide all Veritas community property at the time of separation, including non-gifted logo wear or uniforms, equipment, keys, supplies, documentation (books, CDs, etc.), identification badges/cards, business cards/letterhead, and logon IDs with passwords. Failure to return/provide items may result in deductions from the final pay in accordance with applicable laws. Upon hire, an associate is required to sign the Wage Deduction Authorization Agreement to deduct the costs of such items from the final pay.

Reference/Referral/Verification of Employment on Former Associate

Veritas does not respond to oral requests for references on former associates. Potential employers must fax or email or mail via the USPS the VP of Administration to confirm dates of employment and the request the associate's last title. (Typically the specific community will get these and just scan/forward onto the VP.)

Along with scanning/forwarding the request, the ED or designee provides the reason that the previous associate separated and if they deem the associate as eligible for rehire and why.)

If the previous associate completes a written letter and/or signs a release form, VP of Administration or designee may provide a reference to potential employers.

No other Veritas associate is authorized to represent Veritas from a reference/referral on a former associate.

Rehire & Reinstatement Policy

Veritas reserves the right to employ at will whomever they choose. Typically, the following criteria applies:

- An applicant who is a previous Veritas associate who was terminated for violating Veritas policy or who resigned in lieu of termination from employment due to a Veritas policy violation is ineligible for rehire.
- An applicant who is a previous Veritas associate who chooses to separate from Veritas without the requested notice is ineligible for rehire.
- An applicant who is a former Veritas associate who left Veritas in good standing and was classified as eligible for rehire may be considered for rehire. An application must be submitted to the ED or designee, and the applicant must meet all minimum qualifications and requirements stipulated in the job description for the position. The entire onboarding process must be completed, including completion of a new I-9 and all other new federal and state forms are also required.
- Supervisors must obtain prior approval from the ED **and** the VP of Administration prior to considering or speaking to a former associate about re-employment.
- Rehired associates eligibility to group insurance and benefits begin just as any other new associate.

Workplace Expectations

It is the expectation at each Veritas community that each associate has the duty and the responsibility to be aware of and abide by existing rules (policies and procedures). Each associate also has the responsibility to perform their duties to the best of their ability and to the standards as set forth in their job description or as otherwise established.

Code of Ethics

All associates and volunteers shall perform their duties and responsibilities in an ethical manner whereby each recognizes, values, and exemplifies caring, passion, and respect for every resident and one another. Any unethical behavior will not be tolerated and will be subject to disciplinary action, up to and including termination.

General examples of improper acts of conduct include:

- Any act that is subject to prosecution under criminal or civil codes of law.
- Any act that is either morally or ethically contrary to the Veritas policies and procedures.
- Any act that would intimidate, harass, bully, abuse or violate any right of a resident or family member of a resident or community associate. See Appendix C.

While not all-inclusive, listed below are examples which are synonymous with a code of ethics.

- Associates **will**:
 - Maintain accurate books, files, information, and records.
 - Inform their supervisor and/or contact appropriate authorities if residents or fellow associates are at risk...i.e., there is clear and imminent danger. When possible, the resident and/or fellow associate will be advised that this notification will occur.
 - Inform their supervisor, the ED, and the VP of Administration if they are/are should they become in a dating/personal relationship or become a relative and/or member of the same household of a fellow associate or resident family member.
 - Assure that every resident and as appropriate the resident's family/representatives participate fully in the development of the Resident Service Plan (RSP).
 - Avoid any appearance of, or perception of, preferential treatment or loss of impartiality which means that each associate is prohibited from accepting individual and additional compensation/rewards/gifts or other items of worth for their work from a resident/resident family members/healthcare provider. If a resident/resident family member/healthcare provider insists, the associate will forward the individual and additional compensation/rewards/gifts/or other items of worth to the ED or designee for return to the resident/resident family member/healthcare provider.
 - Staff-wide recognition/appreciation events...i.e., where every associate is eligible for the same treatment are acceptable with the ED's approval:
 - Recognition meals/snacks, special drawings, etc.
 - Plaques and similar service-recognition items.
 - Honorariums, payments for expert witness testimony or responding to a subpoena, and similar forms of compensation should be paid to Veritas. Compensation can be accepted for actual costs incurred such as mileage reimbursement, lodging, and meals (as long as no other entity is providing the same compensation.)
 - Refer all requests to witness documents (power of attorney, guardianship, advance documents, etc.) for the resident or by the resident's guardian/power of attorney to the RCD and ED.
- Associates (and volunteers) **will**:
 - Be cognizant that they are in positions of influence and will avoid dual relationships (personal and professional) that could impair their judgement or lead to the potential for exploitation or special treatment.
 - Be courteous and respectful when working with a resident, resident family member, or other representatives of the resident, advocacy and other professional organizations, and third-party health providers.
- Associates (and volunteers) **will not**:
 - Be disrespectful or insubordinate or participate in actions that can be detrimental to Veritas (or perceived as detrimental).

- Be on community property unless working and/or with permission of the ED or designee.
- Bully, demean, fight, harass, or threaten abuse or violence. (See Appendix C.)
- Conduct personal business for profit on community premises.
- Disclose inappropriately any HIPAA (HIPPA) information or Veritas confidential information.
- Disregard Veritas policies or procedures.
- Disrupt the community.
- Gamble on community premises.
- Intentionally conceal, destroy, falsify, or mislead information of any record.
- Inappropriately use or remove or possess property of a resident or the community.
- Neglect appropriate resident care.
- Possess, distribute, sale, transfer alcohol or illegal drugs, and/or be under the influence of alcohol or illegal drugs.
- Sell/solicit/distribute goods and services, fundraising and/or promotional products on community premises. However, as a community project, the ED can pre-approve selling products, non-perishable food/clothing drives for non-profit charities/organizations/schools. Refer to Appendix F.
- Show favoritism to any person or group.
- Smoke on Veritas premises which do not have designated smoking areas.
- Spread gossip and rumors.
- Violate health or safety policy/procedure of the community and/or regulation/rule of the federal/state/local government.

NOTE: Associates or their immediate family members who reside at a Veritas community will not be served by the team on which they work.

Violations of Code of Ethics:

Violations of the Code of Ethics can result in disciplinary action including termination. Any report and/or violation of Code of Ethics is reviewed by the associate's or volunteer's supervisor and then referred to and investigated by the ED and that supervisor. If the ED is the individual with the reported violation, the Regional Director or VP of Administration or designee oversees the investigation.

Any violation that is reported is reviewed and a decision made regarding discipline and/or termination within fourteen (14) days.

Confidential Information/Confidentiality

The resident and their families and other parties of each Veritas community with whom we interact entrust Veritas associates with important information relating to their personal information and/or medical care. It is our policy that

all information considered confidential will not be disclosed to external parties or to associates without a “need to know.” If an associate questions whether certain information is considered confidential, they should first check with their immediate supervisor or the ED.

This policy is intended to alert associates to the need for discretion at all times and is not intended to inhibit normal medical-care communications. Each associate is required to sign and comply with the Veritas HIPAA (HIPPA) compliance policy.

As a Veritas associate or previous associate, any information labeled as “confidential” remains confidential until you receive a release in writing stating otherwise.

Community Identity Badges

All community associates shall wear their Veritas issued Identity (ID) Badges while on duty. The badge shall include name, title, and designated license or certification as a healthcare professional. This badge must be returned to the community upon last day of employment.

Community Property Use (Building/Room/Vehicle, etc.)

Each Veritas community’s buildings, rooms, grounds, and vehicles are generally and first-priority for the exclusive use of the care of our residents. Personal use by any Veritas associate or individual is prohibited.

Conflicts of Interest

Associates at each Veritas community must avoid any relationship or activity that might impair, or even appear to impair, their ability to make objective and fair decisions when performing their jobs. At times, an associate may be faced with situations in which actions taken on behalf of Veritas or by Veritas which may conflict with the associate’s own personal interests. Associates are prohibited from utilizing the community’s property, information, name, or contracted vendors for personal gain.

Associates with an actual or potential conflict-of-interest must seek advice from their supervisor and ED before engaging in any activity, transaction or relationship that might give rise to a conflict of interest.

Conflicts of interest could arise in the following circumstances at your Veritas community:

- Being employed by, or acting as a consultant to, a Veritas supplier or contractor or healthcare provider, regardless of the nature of the relationship with the supplier or contractor or healthcare provider, while employed with Veritas.
- Hiring or supervising family members/anyone living in your household or closely related persons.
- Serving as a board member for an outside commercial company or organization that is engaged to perform services at Veritas.
- Owning or having a substantial interest in a vendor, supplier or contractor that is engaged to perform services at Veritas.
- Accepting individual gifts, discounts, favors or services from a vendor/potential vendor/supplier, unless equally available to all Veritas associates.

Associate Relationships:

Veritas strongly discourages romantic or sexual relationships between an associate and their supervisor/manager/director/co-worker/resident/resident family member, or any conduct (such as dating) that can lead to the formation of a romantic or sexual relationship. Such relationships may disrupt the workplace and affect

associate productivity and morale and impact resident care. While Veritas does not intend to inhibit social interaction between associates, the following requirements must be adhered to:

- The supervisor/manager/director/associate must promptly disclose the existence of a relationship with another associate and/or resident/resident family member and/or with a community third-party vendor/community contractor to the ED. If the relationship involves the ED, the ED is required to disclose the relationship to the VP of Administration and CEO/President/Owner.
- Veritas may take all steps that is deemed appropriate with respect to the relationship.
 - At a minimum, the supervisor/manager/director/associate must withdraw from participation in activities or assignments that could reward or chastise an associate or resident with whom the supervisor/manager/director/associate has or has had such a relationship.
 - Also, any associate who believes that they have been adversely affected by such a relationship is encouraged to make their views about the matter know to the ED and the VP of Administration, or the CEO/President/Owner. Refer to Appendix C.
- This policy applies to all associates without regard to gender, gender orientation or sexual orientation of the associates.

Outside Employment or Activity:

Associates are permitted to engage in outside work or to hold other jobs, subject to certain restrictions as outlined below.

- Associates are cautioned to carefully consider the demands that additional work activity will create before accepting outside employment. Outside employment will not be considered an excuse for poor job performance, absenteeism, late arrival/tardiness, leaving early, refusal to travel or refusal to work overtime or different hours. If the associate's supervisor in collaboration with the ED determines that an associate's outside work interferes with performance, the associate may be asked to terminate the outside employment, or be terminated from Veritas employment.
- If the associate feels that it is necessary to attain additional work, Veritas must always be the priority.
 - Before starting outside work, a full-time Veritas associate must submit a written request to their supervisor and the ED who will discuss the request before rendering a decision.
 - Full-time work (30-hours or more in a work week) for another employer will generally be deemed to be inconsistent with full-time employment by Veritas.
- Activities and conduct away from the job must not compete with, conflict with or compromise Veritas' interests or adversely affect job performance and the ability to fulfill all job responsibilities.
 - Associates are prohibited from performing any services for customers on nonworking time that are normally performed by Veritas.
 - This prohibition also extends to the unauthorized use of any Veritas resources (staff, tools, equipment, etc.) and the unauthorized use or application of any confidential information.
 - In addition, associates are not to solicit or conduct any outside business during paid working time.

Attendance and Punctuality

Each associate is expected to be present in their assigned department and adhere to a timely schedule. Attendance and punctuality are critical to the medical care of our residents and operations of our communities; therefore, early departure, late arrival (tardiness), and unexcused absences must not occur.

- The Executive Director and/or the associate’s supervisor/designee uses Veritas BO Form 200-500-A to track attendance for hourly/non-exempt associates.
- No associate may depart from the community and their assigned duties unless they are properly relieved by replacement staff and/or their departure is approved by their supervisor.

Consequences - Early Departure/Late Arrival (Tardiness)

Early departure from an assigned shift or the late arrival to an assigned shift without prior supervisor approval is a serious matter and is classified as a Class I disciplinary action.

- Unapproved early departure is defined as leaving five (5) minutes are longer before the assigned shift is completed.
 - Upon one (1) early departure within a one (1) month period, a first notice is issued by the immediate supervisor.
 - Upon two (2) occurrences of early departure within a two (2) month period, a second notice is issued by the immediate supervisor as a final notice.
 - Upon three (3) occurrence of early departure within a three (3) month period, the associate’s employment is terminated.
- Unapproved late arrival is defined as arriving late/being tardy five (5) minutes are longer of the assigned shift. The following corrective action will occur:
 - Upon one (1) late arrival/tardy occurrence within a one (1) month period, a first notice is issued by the immediate supervisor.
 - Upon two (2) occurrences of late arrival/tardy within a three (3) month period, a second notice is issued by the immediate supervisor as a final warning.
 - Upon three (3) occurrences late arrival/tardy within a six (6) month period, the associate’s employment is terminated.

Absence

For regular schedule change requests, the associate should notify their supervisor at least fourteen (14) working days in advance. Each request will be considered and the decision is based on the associate’s request and the community’s needs.

If an associate is unable to report for work for any reason, the associate must:

1. Contact their supervisor before their regular start time and identify the reason for the absence. Except in the case of emergency (hospitalization, accident, etc.), it is not acceptable to send a text or leave a voicemail message (unless the supervisor has pre-approved this type of notification).
2. When the associate is out for an illness for more than two (2) days, the associate is required to contact their supervisor daily until they return to work, and they are required to provide a physician’s work release to return to duty.
3. Upon return to work the associate must complete a Leave of Request Form.

Absences that qualify under the Family and Medical Leave Act (FMLA) will not be counted against an associate's attendance record. Medical documentation within the guidelines of the FMLA may be required in these instances. For further information on FMLA, refer to Appendix B.

Absence Without Notice:

Not reporting to work and not calling to report the absence is defined as a no-call/no-show and is a serious matter.

- The first instance of a no call/no show will result in a final written warning.
- The second separate offense results in termination of employment with no additional disciplinary steps.

Consequences - Unexcused Absence:

When an absence is classified as unexcused the following corrective consequences will occur:

- Upon one (1) unexcused absence occurrence within a one (1) month period, a first notice is issued by the immediate supervisor.
- Upon two (2) unexcused absence occurrences within a three (3) month period, a second notice is issued by the immediate supervisor as a final warning.
- Upon three (3) unexcused absence occurrences within a six (6) month period, the associate's employment is terminated.

Absenteeism Pattern:

An absentee pattern is defined as any absence after a second disciplinary action is filed. Patterns of absenteeism include Associates who demonstrate a pattern of absences (i.e., absent every Friday before a long weekend, or the day before or after payday, or frequent calling outs, etc.). Patterns of absenteeism will result in disciplinary actions which can include termination of employment.

Job Abandonment:

A no call/no show lasting three days is considered job abandonment and is deemed an associate's voluntary resignation of employment. **Job Abandonment by a licensed associate is reportable to state agencies.**

Attire and Grooming

It is important for all associates to project a professional image while at work by being appropriately attired. All associates at each Veritas community are expected to be neat, clean, well-groomed, and compliant with infectious-disease control policies/procedures while on the job. Clothing must be consistent with departmental standards and must be appropriate to the type of work being performed.

- Hands must be washed between services to residents, after going to the bathroom, before meals, and before placing gloves on hands for work tasks.
- Nails must be kept trimmed short and kept clean.
- Hair must be kept of natural tint, clean, neatly cut or restrained so as not to interfere with work requirements and infection control policy.

- Clothing must be neat, clean, appropriate, and in compliance to any department’s specific clothing requirement.
 - Uniforms are community dependent and the community leadership team will decide if scrubs, company logo wear, or business attire is worn.
 - All associates must be covered from shoulders to knees at all times. See-through or sleeveless clothing, tank-tops, and strapless shirts/blouses are not permitted.
 - Any article of clothing with inappropriate messages/wording are not allowed.
- Shoes must be closed toe and slip-resistant for direct care staff, dietary, housekeeping, and maintenance. The ED will ensure compliance and determine if the community will provide an allowance to cover the cost of slip-resistant shoes.
- Community name badges supplied from the approved third-party vendor will be worn by associates when on community premises.
- Natural and artificial scents may become a distraction from a well-functioning workplace and are also subject to this policy.
- Jewelry is to be kept to a minimum. No ring(s) in nose, tongue or eyebrows are permitted when an associate is present on Veritas premises.
- Any tattoo which has the potential to offend a resident, resident’s family member or associate is to be covered while on community premises. See the ED for more information.

NOTE: The ED reserves the right to determine appropriateness. Any associate who is improperly dressed will be counseled or in severe cases may be sent home to change clothes. Continued disregard of this policy is cause for disciplinary action, which may result in termination.

Media Inquiries (Local, State, National)

All inquiries from the media including reporters from local, state, national outlets must be referred to the ED and CEO/President/Owner and VP of Administration.

Parking on Community Premises

Veritas associates/residents/visitors park at their own risk on Veritas premises. Veritas is not responsible for theft or damage to any vehicle parked on or near the Veritas community. Also, Veritas is not responsible for personal property left in vehicles that is either lost, damaged, stolen or destroyed.

Staff Meetings

Daily Stand-up Meeting & Called Meetings

Any associate scheduled for a meeting is expected to attend and participate in the meeting.

- Every associate in a leadership role at each community is expected to attend and participate at the daily stand-up meeting.
 - This meeting is critical to review the daily operations needs as well as perform any quality assurance planning and/or resolution.
 - The ED and/or Designee convenes the meeting and is responsible for its agenda and assuring that directives are performed.

- Hourly associates scheduled for any meeting are to clock-in and be paid for their attendance/participation.

Training / In-Service Programs

Every scheduled associate is expected to attend, participate, and be paid for any departmental training and/or in-service-program.

- Associates shall communicate with the trainer any questions/concerns or if you do not understand the standards and guidelines presented.
- Contact your supervisor or the ED if you have further questions or concerns.

Telephone Use

Community phones are intended for the use of serving our residents and conducting Veritas business. Personal use of community phones are prohibited except for emergencies. When an associate is on shift, use of their personal cell phones for personal use is prohibited except during the associate's break.

WORKPLACE SAFETY

General Safety

It is the responsibility of each associate to conduct all tasks in a safe and effective manner complying with the Veritas Workplace Safety program and all applicable local, state and federal safety and health regulations and program standards, and with any special safety concerns for use in a particular area or with a third-party vendor or healthcare provider.

Although most safety regulations are consistent throughout each department and program, each associate has the responsibility to identify and familiarize themselves with the emergency plan for their working area. Each department will refer to the community's Emergency Management Plan (EMP) and train/in-service associates and post appropriate EMP details for handling emergencies such as fire, weather-related events, and medical crises.

It is the responsibility of the associate to complete an Accident and Incident Report for each safety and health infraction that occurs by an associate or that the associate witnesses. Failure to report such an infraction may result in associate disciplinary action, including termination.

Furthermore, Veritas requires that every associate in the community assumes the responsibility of individual and organizational safety. Failure to follow Veritas safety and health guidelines or engaging in conduct that places a resident, associate, third-party vendor/healthcare provider, or community associates and property at risk can lead to disciplinary action including termination.

The Maintenance Director at each Veritas community is typically designated as the safety coordinator. The safety coordinator in collaboration with the ED has the responsibility to develop and the authority to implement the safety and health program in the interest of a safer work environment, and helps facilitate the community's EMP. For more information on workplace safety and/or EMP, the safety policies and forms on the website or request a printed copy from your ED.

Infection Disease Control

Generally, you are not to come to work if you have any open lesions or an infectious disease or became ill and/or you have contagious symptom(s).

- Exceptions can be made if symptoms/issues are mitigated by approved/regulated personal protective equipment (PPE), protocols, etc. All exceptions require approval/collaboration with state-specific guidelines and from the associate's supervisor, ED, DCS, RDO, or the VP Administration.
- For more information, see the infection control policy and safety policies. Contact your supervisor or ED immediately.

Weapon-Free Workplace

Each Veritas community is a weapon-free workplace. Except for sanctioned use of law enforcement agencies, weapons of every kind, including firearms, are prohibited from community premises. Each resident in their residency agreement and each associate is required to acknowledge in writing their compliance with the community's weapon policy. For more information on weapon compliance, associates refer to Veritas HR Form 100-4-F.

Smoke-Free Workplace

In order to provide and maintain a safe and healthy work environment for all associates, each Veritas community is a smoke-free/tobacco product free workplace. However, in communities that provide a designated smoking area for residents, associates are permitted to use that area as well during their assigned break. Veritas defines smoking as the "act of lighting, smoking or carrying a lighted electronic cigarette device, cigarette, smoldering cigar, pipe of any kind, or use of any tobacco product."

The smoke-free workplace policy applies to any community area which is not designated as a smoking area, and

- Any areas which includes buildings, grounds, and parking lots of community property.
- Any Veritas-sponsored on-site conferences and meetings.
- Any vehicles owned or leased by the Veritas community.
- Any residents and visitors/guests to community premises.
- All contractors and consultants and/or their associates working on community premises.
- All associates, temporary associates, contractors and interns.

Smoking is not permitted in parking lots and/or parked vehicles in the parking lots.

Associates who violate the smoking policy will be subject to disciplinary action up to and including immediate termination.

Drug-Free Workplace

Each Veritas community provides a safe and productive work environment. Alcohol and drug abuse pose a threat to the health and safety of residents and associates and to the security of Veritas equipment, operations and premises. For these reasons, Veritas is committed to a drug-free workplace (DFW) which includes the elimination of drug and/or alcohol use and abuse in the workplace.

This DFW policy outlines the practices and procedures designed to correct instances of identified alcohol and/or drug use in the workplace which applies to all associates and all applicants for employment at Veritas. The ED or designee will oversee community compliance with a DFW.

Crimes Involving Drugs

Each Veritas community prohibits all associates from manufacturing, distributing, dispensing, possessing or using an illegal drug or misuse of prescribed medication or over-the-counter (OTC) drugs in or on Veritas premises or

while conducting Veritas business. Law enforcement personnel shall be notified, when criminal activity is suspected or confirmed.

Associate Assistance and Drug-Free Awareness

Illegal drug use and/or alcohol misuse have a number of adverse health and safety consequences. As part of our DFW commitment and in collaboration with our insurance carrier, the VP of Administration circulates DFW announcements, education, training tools, etc. to each community. In addition, an Employee Assistance Program (EAP) is available to all associates (full-time and part-time) to help promote well-being and enhance the quality of life for you and your family. Support and guidance is available for assistance with family and personal issues online at www.ibhworklife.com or email eapcounselor@ibhcorp.com or by calling 800.386.7055 (24 hours a day/days a week). For the benefit of the residents, you and/or your family, the company, your supervisor can instruct you to contact the EAP if they believe you need assistance.

Veritas will endeavor to assist and support associates who voluntarily seek help for such problems before becoming subject to discipline and/or termination under this or other policies. Such associates may be allowed to use accrued PTO, or placed on leaves of absence, or referred to treatment providers and otherwise accommodated as required by law. Such associates may be required to document that they are successfully following prescribed treatment and to take and pass follow-up tests if they hold jobs that are safety sensitive or that require driving or if they have violated this policy previously.

Associates should report to work fit for duty and be free of any adverse effects of illegal drugs or alcohol or use of prescribed medication. This policy does not prohibit associates from the lawful use and possession of prescribed medications. Associates must, however, consult with their doctors about the medications' effect on their fitness for duty and ability to work safely and promptly disclose any work restrictions to their supervisor and the ED. Associates should not, however, disclose underlying medical conditions unless directed to do so.

Workplace Rules

The following workplace rules apply to all associates:

- Whenever associates are working, are operating a community vehicle, are present on community premises, or are conducting related work off-site, they are prohibited from:
 - Using, possessing, buying, selling, manufacturing or dispensing an illegal drug (to include possession of drug paraphernalia), or misuse of prescribed medication, or misuse of over-the-counter (OTC) drug.
 - Being under the influence of alcohol or an illegal drug or prescribed medication without a proper prescription
- The presence of any detectable amount of any illegal drug or illegal controlled substance in an associate's body while performing Veritas business or while at a Veritas community is prohibited.
- Veritas prohibits any associate to perform their duties while taking prescribed drugs or OTC drugs that are adversely affecting the associate's ability to safely and effectively perform their job duties. Associates taking a prescribed medication must carry it in the container labeled by a licensed pharmacist or be prepared to produce it if asked.
- Any illegal drugs or drug paraphernalia or misused prescribed medication or misused over-the-counter (OTC) drug may be turned over to an appropriate law enforcement agency and may result in criminal prosecution.
- From working once symptoms of infectious disease occur and which cannot be mitigated by the use of appropriate personal protective equipment (PPE).

Required Testing

Each Veritas community retains the right to require any of the following tests:

- **Pre-employment:** Applicants who have received an offer of employment are subject to a physical exam (based on their assigned job description) which includes a drug screen before beginning work. Refusal to submit to testing will result in disqualification of further employment consideration.
- **Random:** Veritas reserves the right to require random tests for associates.
- **Reasonable suspicion:** Any associate is subject to testing based on observations by any supervisor of apparent workplace use, possession, impairment, or displaying active symptoms. Once contacted, the ED will arrange an appointment and transportation (if screening/test is off community premises) for the associate. Associates who are suspected of a policy violation will not be allowed to return to work while awaiting the test results.
- **Post-accident:** Associates are subject to testing when they cause or contribute to workplace accidents that damage a community vehicle, machinery, equipment or property and/or result in an injury to themselves or another associate, resident or individual while on company premises or participating on a community event. In any of these instances, the investigation and subsequent testing must take place within two (2) hours following the accident, if not sooner. Veritas reserves the right to require a test after any type of accident or injury.
- **Follow-up:** Associates who have tested positive, or otherwise violated this policy, are subject to discipline up to and including termination of employment.

Testing Confidentiality

The ED or designee is the Medical Review Officer (MRO). Information and records relating to positive test results, drug and alcohol dependencies and legitimate medical explanations provided to the MRO is kept confidential to the extent required by law and maintained in secure files separate from normal personnel files.

Consequences – Refusal to Drug Screen

Applicants who refuse to cooperate in a drug screen or who test positive will not be hired and will not be considered for future employment.

Associates who refuse to cooperate in required tests or who use, possess, buy, sell, manufacture or dispense an illegal drug or misuse of a prescribed medication or over-the-counter (OTC) drug in violation of this policy will be terminated.

The first time an associate tests positive for alcohol or illegal drug use under this policy results in disciplinary action up to and including discharge. Depending on the circumstances and the associate's work history/record, Veritas may offer an associate who violates this policy or tests positive the opportunity to return to work on a last-chance basis pursuant to mutually agreeable terms, which could include follow-up drug testing at times and frequencies for a minimum of one (1) year but not more than two (2) years. If the associate either does not complete their rehabilitation program or tests positive after completing the rehabilitation program, they are subject to immediate discharge from employment.

Associates are paid for time spent in alcohol/drug testing and then suspended without pay pending the results of the drug/alcohol test. After the results of the test are received, a date/time will be scheduled to discuss the results of the test; this meeting will include the associate's supervisor and the ED. **If** the results prove to be negative, the associate receives back pay for the times/days of suspension.

Inspections

To ensure the physical safety to anyone on Veritas premises and for the general safety of Veritas premises, each Veritas community reserves the right to inspect all portions of its premises for drugs, alcohol, illegal items or other contraband. Inspections can be announced or unannounced. All associates, contract staff and guests/visitors may be asked to cooperate in inspections of their persons, work areas and the associate's property that might conceal a drug, alcohol, illegal items or other contraband. Associates who possess such contraband or illegal items or refuse to cooperate in such inspections are subject to appropriate discipline up to and including discharge.

Emergency Evacuation

As part of each Veritas community's safety practices and Emergency Management Plan (EMP), building evacuation plans are posted (and discussed during orientation and/or renovation projects), exit signs are posted, and evacuation drills are conducted. The Maintenance Director or designee acting as safety coordinator, will oversee evacuation drills. Associates shall adhere to the general guidelines listed below.

- Count the doors or desks between your work area and nearest exit(s). During a fire, you may need to find your way out in the dark.
- Know the location of the nearest fire alarm and/or fire extinguisher and learn how to use it. (See the Maintenance Director for training.)
- Post emergency numbers by each departmental phone.
- In the event of fire, activate the alarm, escape quickly and safely as follows:
 - Guide residents, and leave the immediate area and close all doors as you pass through them,
 - Go to the nearest exit that is not blocked by fire,
 - Remember that heat, smoke, and toxic fumes rise quickly. This leaves the safest air near the floor. If you encounter smoke, stay low and/or crawl.
 - Test doors before you open them. Kneel/crouch at each door and touch the door, the door knob, and the space between the door and the frame with the back of your hand.
 - If door or any part of door is hot, use a different escape route.
 - If door is cool, open it cautiously, and proceed.
- Once outside, move away from the building to your designated "safe place." The Maintenance Director designates safe places which are at least 100 feet from the building. Check with your supervisor or the Maintenance Director for your designated safe place.

For more information on emergency evacuation, refer to the safety policies and EMP for your community.

Safety Data Sheets (SDS)

Each Veritas community complies with applicable state and federal chemical management and injury/illness compliance solutions. Each workplace area that contains chemicals is provided the Safety Data Sheets (SDS) information and procedures. Contact the Maintenance Director for more details and SDS orientation.

Violence in the Workplace

All associates, residents, third-party vendors/healthcare providers must be treated with courtesy and respect at all times. Associates are expected to refrain from conduct that may be dangerous to others.

Conduct that threatens, demeans, intimidates or coerces another person will not be tolerated. Veritas community resources may not be used to threaten, stalk or harass anyone at the workplace or outside the workplace. Veritas classifies a “threat” coming from an abusive personal relationship identical to any form of violence.

Indirect or direct threats of violence, incidents of actual violence and suspicious individuals or activities should be reported as soon as possible to a supervisor and the ED. When reporting a threat or incident of violence, the associate should be as specific and detailed as possible. Associates should not place a resident or themselves in peril, nor should they attempt to intercede during an incident.

Associates should promptly inform their supervisor and the ED of any protective or restraining order that they have obtained that lists the workplace as a protected area. Associates are encouraged to report safety concerns with regard to any violence.

Each Veritas community will promptly and thoroughly investigate all reports of threats of violence or incidents of actual violence and of suspicious individuals or activities. The identity of the individual making a report will be protected as much as possible. Veritas will not retaliate against associates making good-faith reports of violence, threats or suspicious individuals or activities. In order to maintain workplace safety and the integrity of its investigation, Veritas may suspend associates who are being investigated of workplace violence or threats of violence, either with or without pay, pending investigation. For more information, consult *Appendix C – Veritas Anti-Harassment Policy and Complaint Procedure* and the VP of Administration.

Anyone found to be responsible for threats of or actual violence or other conduct that is in violation of these guidelines will be subject to prompt disciplinary action up to and including termination of employment.

Veritas encourages any associate to bring their disputes to the attention of their supervisor and the ED or designee before the situation escalates. Veritas will not discipline associates who make good-faith reports.

Workplace Bullying

Veritas defines bullying as “repeated inappropriate behavior, either direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment.” Such behavior will not be tolerated as each associate will be treated with dignity and fairness. Associates found in violation of this policy will be disciplined up to and including termination.

Bullying may be intentional or unintentional. However, it must be noted that where an allegation of bullying is made, the intention of the alleged bully is irrelevant and will not be given consideration when meting out discipline. As in sexual harassment, it is the effect of the behavior upon the individual that is important. Veritas, while not exclusive, considers the following types of behavior examples of bullying:

- **Verbal bullying:** Slandering, demeaning, ridiculing or maligning a person or their family; persistent name calling that is hurtful, insulting or humiliating; using a person as the butt of jokes; abusive and offensive remarks.
- **Physical bullying:** Pushing, shoving, kicking, poking, tripping, assault or threat of physical assault; damage to a person’s work area or property.
- **Gesture bullying:** Nonverbal threatening gestures or glances that convey threatening messages.
- **Exclusion:** Socially or physically excluding or disregarding a person in work-related activities.

For more information, consult *Appendix C – Veritas Anti-Harassment Policy and Complaint Procedure*.

Compensation & Work Schedule

Veritas endeavors to attract and retain associates with competitive wages in the community's marketplace that is fair and equitable based upon experience, education, prior performance, skill, abilities, and consistently exceptional job performance. Wages vary with individual and budget considerations and in compliance with all applicable statutory requirements. With this in mind, our wage program is built to balance both associate and Veritas community needs.

Generally Veritas leadership does not publish or discuss an associate's individual wages with anyone other than the individual associate. The VP of Administration maintains a pay range schedule.

Work Day and Work Week

Each Veritas community's work day is defined as the 24-hour period starting at 12:00am and ending at 11:59pm.

For nonexempt associates, a work hour is any hour of the day that is worked and should be recorded to the nearest hundredth of an hour (1/100).

The work week covers seven consecutive days beginning on Sunday (Saturday night at midnight/12:00am) and ending on the following Saturday (Friday night at 11:59pm). The usual work week period is 40 hours and applies to all non-exempt associate categories.

Payment of Your Compensation

Currently, payroll distribution occurs bi-monthly based on designated pay periods (see pay period section below). In a calendar year which is defined from January through December there are 24 pay periods. Payroll is delivered by ACH/auto-deposit into your account at the financial institution of your choice or by a Global Cash Pay Card if the associate does not choose a financial institution. Cash payments are prohibited. Each associate does receive a paystub that confirms payroll payment. For more information, contact the ED or BOM.

Associate paystubs will only be given personally to that associate or mailed to their home address.

If an associate's marital status changes or the number of exemptions previously claimed increases or decreases, a new W-4 Form and the appropriate state tax withholding form must be submitted to the ED or BOM or designee.

Pay Period Schedule

Currently, each month has two (2) pay periods and each adheres to the work week in determining overtime pay for non-exempt associates. The ED or Business Office Manager (BOM) distributes a calendar of pay periods and payroll distribution dates each year. This information is also posted in the associate break room. The current pay periods are as follows:

- **Veritas Senior Living Communities:** Work completed from the 16th of the previous month thru the end of month (EOM) of previous month is paid on the 10th of the current month. Work completed on the 1st thru the 15th of the current month is paid on the 25th of the current month.
- **Veritas Incare Communities and Home Office:** Work completed on the 26th of the previous month thru the 10th of the current month is paid on the 15th of the current month. Work completed on the 11th thru 25th of the current month is paid on the end of month (EOM) of the current month.

NOTE: Exceptions occur due to national holidays and/or bank holidays. For example, new banking laws or banking issues not under our control sometimes delay the aforementioned schedule. When these issues occur or approach the ED will notify all associates.

Overtime

During busy periods associates may be required to work extended hours. Prior approval of your supervisor and/or the ED is required before any nonexempt associate works overtime.

In accordance with Federal and State regulations, overtime is calculated on the work week, not the pay period. Nonexempt associates are paid for work performed beyond forty (40) hours in a work week at a rate of 1.5 times the average rate (which is sometimes called the regular rate, and which will be calculated pursuant to applicable wage laws).

For purposes of overtime (OT), PTO or holiday pay does not apply toward the calculation of work time. OT begins after any type of PTO pay.

- If a nonexempt associate has 42.5 hours in a work week which included 2.5 hours of PTO, the associate would not receive OT for the 2.5 hours, but would receive the average rate (straight time) for the 42.5 hours.
- If a nonexempt associate worked 44.5 hours in a work week which included 2.5 hours of PTO, the associate would receive 42.5 at the average rate (straight time) and 2 hours at the OT rate (1.5 times).
- Nonexempt associates who work OT without approval will be paid, but will be subject to disciplinary action which includes termination for working without authorization.

A nonexempt associate who anticipate the need for overtime to complete the week's work must notify their supervisor in advance and obtain approval before working hours that extend beyond the normal work schedule.

Remember that the work week begins each Saturday at midnight and goes through the following Friday at 11:59pm.

Payroll Deductions

Veritas complies with various payroll deductions required by law, such as federal income tax, state income tax, FICA, and any court-ordered garnishments*. You must complete appropriate state and federal forms to authorize optional and voluntary deductions from your payroll. See the ED/BOM or designee for details.

Your payroll stub itemizes all amounts withheld.

Your annual W-2 reflects all your earnings and withholdings per calendar year.

***NOTE:** When court-ordered/state-agency ordered deductions are received in writing, we will comply with the order through payroll deduction and provide notification to the associate. Veritas acts in accordance with the Federal Consumer Credit Protection Act which places restrictions on the total amount that may be garnished from your paycheck.

Time Records & Reporting

All absences from work schedules should be appropriately recorded.

All Hourly/Nonexempt associates are required to use the time clock system so that accurate time records are maintained. Nonexempt associates are never allowed to work off the clock system unless it is malfunctioning. When this occurs the associate is required to follow the time clock exception policy. If you are an Hourly/Nonexempt associate, your supervisor or ED or BOM or designee will assign/enroll you to the electronic timecard system. Only you are allowed to clock in/clock out for your records. Your supervisor, the BOM or designee can document corrections.

Time Clock Exceptions Policy

Missed punches, recording time on a log, or communicating time other than using the clock is an exception. Using the time clock is a part of expected job performance and will be a part of your annual evaluation.

- A Time Clock Edit Form must be completed and submitted to correct any time clock punch or mis-punch issues.
- First and second exception within a quarter receives verbal warning, confirmation that you understand the process, and documentation to the associate's personnel file.
- Third exception within a quarter receives a written warning.

General Rules for Time Clock

1. Associates are not allowed to clock in/clock out for other associates.
2. Associates are not allowed to share their time clock passcode with other associates.
3. If an associate forgets to clock in/clock out, or if time clock malfunctions, they must notify their Supervisor immediately so that the time may be accurately recorded by completing a Time Clock Edit Form.
4. Associates must clock out if they are leaving the Veritas community premises for non-Veritas activity and then clock back in upon their return to the Veritas community.
5. Unless prior approval is received, associates may not clock in more than five (5) minutes before their scheduled starting time or five (5) minutes after their scheduled quitting time. Please note that it is not permitted to clock in 5 minutes early and 5 minutes late on the same day without prior approval.
6. Failure to comply with time clock procedures will result in a disciplinary action including up to termination.

Time Clock Malfunction or Error or Required Correction

It is always the hourly/non-exempt associate's responsibility to contact their supervisor or designee to acknowledge that the time clock is malfunctioning or if a time clock correction is warranted when the following occurs:

- If the time clock system malfunctions ,or
- If accidental oversight has occurred by the associate, or
- If the associate's meal break is interrupted or cancelled due to work responsibilities.

In all occurrences listed above, the associate is required to use the Time Clock Edit Form so that the supervisor or designee assures that the associate is properly compensated.

Unreported Hours

All hourly/non-exempt associates are required to use the time clock system appropriately and accurately each shift.

- Intentional or careless working off the clock is prohibited.
- Forgetting or ignoring to utilize time clock and/or the Time Clock Edit Form is unacceptable.

Violations listed above will result in disciplinary action up to and/or including termination.

Falsification, Tampering & Unauthorized Viewing

Due to the severity of the violations below, there will be immediate discipline enforced which can include termination.

1. Any attempt to falsify information.
2. Any attempt to tamper with timekeeping hardware or software.
3. Clocking in/Clocking out for an absent or late associate by another associate.
4. Interference with an associate attempting to use the time clock system.
5. Unauthorized viewing of another associate’s time clock information.
6. Sharing associate time clock passcode.

Work Break/Rest Period or Meal Break

The scheduling of or revisions to work breaks/rest period or meal break is set by the associate’s supervisor or ED with the goal of providing the best productivity and associate health and the least possible disruption to the Veritas community.

- Exempt associates, as they are paid a salary regardless of the hours they work, may choose to take breaks as needed, but the breaks should not interfere with completing their work.
- Nonexempt associates work break/rest period or meal break policy is listed below.
 - A paid work break/rest period of fifteen (15) minutes is provided for any associate working over four (4) hours in a shift and two (2) fifteen (15) minute breaks if working eight (8) hour shift. For this kind of break, the time clock is not used as this time is considered “time worked” and is compensable. This break period must be taken away from the associate’s work area, preferably in the associate break room.
 - Associates who have a meal break as part as their schedule take a thirty (30) minute meal break when working more than six (6) hours on a shift and take two thirty (30) minute meal breaks or one sixty (60) minute meal break when working nine (9) or more hours on a shift. For this kind of break, nonexempt associates are required to clock out and take the meal break away from their work area preferably in the associate break room or offsite.
 - Associates are to be completely relieved of all job duties while on meal breaks. An associate cannot take their breaks at their work desk/station. If the meal break is interrupted due to job responsibilities the associate must notify their Supervisor so that an adjustment can be made by completing the Time Clock Edit Form.
 - All food and snacks must be consumed in the designated break room or dining room or offsite.
 - No associate is permitted to give up a specified break period in order to leave their shift early.
 - No type of break may be used to account for an associate’s late arrival or early departure or to cover time off for other purposes...i.e., you may not accumulate 15-minute breaks (or in portion of a 15-minute break) to extend or combine other breaks.

Associate Travel and Reimbursement

Associates will be reimbursed for reasonable expenses incurred in connection with approved travel on behalf of Veritas. All travel for staff must be authorized in advance. Upon completion of the trip, and within thirty (30) days, the traveler must submit receipts and a completed check request form to obtain reimbursement of expenses.

- Exempt associates will be paid their regular salary for weeks in which they travel.
- Nonexempt associates' wages will include travel time in accordance with federal and state wage payment laws.

All travelers seeking reimbursement should incur the lowest reasonable travel expenses and exercise care to avoid the appearance of impropriety. If a circumstance arises that is not specifically covered in the travel policies, the most conservative course of action should be chosen.

Mileage reimbursement is based on the I.R.S. mileage reimbursement rate for any given calendar year (JAN – DEC). Travelers are to document the starting mileage and ending mileage when driving their vehicle on behalf of Veritas business. Some associates receive a car allowance in their annual compensation and do not receive mileage reimbursement.

For more details, contact the ED or Director of Business Office Operations and/or refer to the Business Office Policy - Travel & Expense 1.31 (issued November 1, 2019).

Wage Review

Wage adjustments are based on funding to each Veritas community's annual budget and are not guaranteed.

When possible, budget allocations for merit increases are planned for and allocated in the annual budget. Depending on the associate's start time, an increase may be pro-rated. The wage review program is designed to assist the ED in planning and allocating merit and promotional increases that reward individual performance, that are market competitive and that are internally equitable.

Any wage adjustment must be approved by the ED in collaboration with the associate's supervisor and the VP of Administration or designee. The VP of Administration monitors all wage increase/adjustment requests to assure internal equity and compliance with Veritas policies and guidelines.

Benefits

Although benefits described in this handbook are currently available, the benefits may be adjusted by the Veritas Home Office. Considerations for adjustments include, but are not limited to, an increase/decrease in the costs of the benefits and/or increase/decrease of funds or revenue received by the Veritas community which may have an effect on a community's fiscal capacity.

Benefits are based on regular full-time associates and a calendar year (356 continuous days). Regular full-time associates work a minimum of thirty (30) hours per work week in a calendar year. Regular part-time associates with a minimum average of 16-hours per week are not eligible for all benefits, but for those benefits that are provided for regular part-time associates, the benefits are pro-rated based on their average work week.

Paid Time Off (PTO)

Each Veritas community recognizes the need for eligible associates to have time away from work for rest and relaxation, conducting personal business, and to provide against lost earnings due to illness. Paid Time Off (PTO) is the method used to provide and calculate the time available while an associate is employed at Veritas. The PTO program includes general guidelines as well as separate guidelines for associates who are hourly/non-exempt and salary/exempt.

The Leave Request Form (HR Form 100-21-A) must be completed for **all** PTO requests for **all** associates.

PTO is paid at the associate's base rate at the time the PTO is taken. PTO pay is not included in overtime calculation and does not include any special forms of compensation such as incentives, commissions, bonuses or shift differentials.

With the exception of emergency events or sudden illness, all PTO must be scheduled in advance with the associate's supervisor and/or the ED.

PTO Requests

Planned time away requests must be made via Veritas HR Form 100-21-A (Leave Request/PTO Form) at least fourteen (14) days in advance (preferably 30 days). If an unexpected/unplanned time away occurs, the associate must contact their supervisor prior to their next shift and submit the form upon their return to work. All requests must be approved based on a number of factors, including department operating and staffing requirements. With all PTO requests, the associate's supervisor must return the PTO request form to the associate within seven (7) business days of the date it is submitted indicating that the request has been approved or denied. If the request for PTO is denied, the supervisor will provide an appropriate reason on the form returned to the associate.

PTO Policy for Salary/Exempt Associates

The PTO policy for regular/full-time Salary/Exempt Associates foregoes implementation or accrual system of any sort and supports a Flexible PTO Leave Policy. While the PTO request form and supervisory approval is required, these associates are able to take PTO leave when approved without the formalities of a tracking system or maximum days. However, PTO taken will be noted on the associate's payroll stub. Under this policy, the eligible associates are expected to:

- Recognize that the associate must plan time away in advance when possible and communicate with their supervisor appropriately.
- Typically, eligibility for PTO begins after ninety (90) days of continuous service. If PTO is permitted prior to 90-days, the probationary period is extended to assure 90-days of continuous service is achieved.
- Take a minimum of fifteen (15) days of PTO annually.
- Understand that due to staffing needs, sometimes, not all PTO leave requests can be honored. Advance requests are still subject to the appropriate approval, and supervisors reserve the right to request verification of absences (doctor notes, obituary for funerals, etc.)
- Meet established goals and responsibilities despite the PTO leave.
- Flexible PTO leave does not apply to eligible associates on maternity leave, military leave, ADA leave, FMLA leave, work-injury leave, or other types of leave. For more information on these types of leave, refer to the corresponding policies and/or consult the community ED or VP of Administration.
- If expectations outlined in the Flexible PTO Leave Policy are not met, Veritas reserves the right to temporarily or permanently revoke the Flexible PTO leave for any eligible associate.
- If gross abuse of the Flexible PTO Leave is observed, disciplinary action will be taken, which may include termination of employment.

PTO Policy for Hourly/Non-Exempt Associates

PTO is based on hours worked and the number of years of continuous service. It is calculated each pay period based on the hours worked, subject to the cap on accrued balances discussed below. The amount of PTO accrued and paid is noted on the associate’s payroll stub.

Years of Service and Equivalent Hours for Hourly/Non-Exempt Associates

Hourly/Non-Exempt Associates first become eligible for PTO after 90 days of continuous employment. Their PTO program is:

- During the first year of employment, PTO shall accrue at the rate of 1 PTO hour for every 37 hours worked up to a maximum of 56 hours in a calendar year.
- After the first year of employment and up to the fifth year of employment, PTO shall accrue at the rate of 1 PTO hour for every 18.5 hours worked, up to a maximum of 112 hours.
- After the fifth year of employment and subsequent years of employment, paid time off shall accrue at the rate of 1 PTO Hour 12.4 hours worked, up to a maximum of 168 hours.
- Hours worked will include Regular, Overtime, Training, and Holiday hours worked.
- PTO earned but unused by the end of the calendar year will be carried over to the next calendar year up to the amount of hours listed below. Veritas encourages all Associates to use their earned PTO.
- If an hourly/non-exempt associate resigns and if a proper notice is provided and a proper notice is successfully completed, accrued unused PTO earned through the current year of active employment will be paid at the associate’s base rate of pay and distributed in the final paycheck. Accrued unused PTO from prior years are forfeited.
- If an hourly/non-exempt associate is terminated, any accrued unused PTO earned is forfeited. If an associate does not complete the probationary period, then any accrued but unused PTO is forfeited.
- In the event of an hourly/non-exempt associate’s death, all earned unused PTO time is paid to the associate’s estate.

Hourly/Non-Exempt Associate Accrual Metric Chart

Years of Employment	Hours Earned per Hours Worked	Max Hours per Year	Max Carryover Hours
Hire – 1 Year	.027	56	40
1+ - 5 Years	.054	112	80
5+ Years	.0807	168	80

PTO – General Rules for Hourly/Non-Exempt Associates

1. Associates must use the *Leave Request Form* to request PTO. This form must be approved by the associate's Supervisor and/or the ED. PTO Forms that are not properly approved and submitted prior to each pay period will be delayed until the next pay period. The approved PTO Request Form is routed to the ED or designee for PTO tracking and payroll payment.
2. Accrued PTO and the amount of PTO used (paid) is summarized on each payroll stub.
3. PTO is accrued according to the schedule in this policy as illustrated in the above grid, subject to the cap on accruals discussed below. Under no circumstances will associates be permitted PTO if it has not been accrued.
4. PTO begins accruing upon hire, but associates are not eligible to use PTO until after ninety (90) days of continuous service.
5. PTO will not be earned during an unpaid leave of absence.
6. PTO is paid at the regular-rate of pay (straight time). Payments for PTO are provided to the associate on the regular payday following the pay period that PTO is used. Associates may use their PTO however they wish at any time of the year provided the PTO is accrued and approved by their Supervisor and/or the ED.
7. PTO cannot be paid-out during an associate's tenure.
8. PT associates do accrue PTO.
9. PRN (temporary) associates do not accrue PTO and are not eligible for PTO.

PTO Limitations and Cap on Accruals for Hourly/Non-Exempt Associates

1. The maximum carryover for accrued PTO from the current calendar year to the next calendar is listed in the Associate Metric chart above.
2. If at any time the maximum accrual is reached, PTO stops accruing. See the Associate Metric chart above.
3. PTO is not transferable from one associate to another associate.

Disposition of Accrued PTO for Non-Exempt Associates

Accrued unused PTO earned during the current year of employment is paid in the non-exempt associate's last payroll **unless:**

1. Veritas terminates the associate for cause in which case any accrued unused PTO is forfeited.
2. Associate resigns without giving appropriate notice period and/or does not successfully complete such notice period, in which case any accrued unused PTO is forfeited.
3. Associate does not complete the probationary period, in which case any accrued unused PTO is forfeited.

Other Paid Time Away

Holiday

Each Veritas community holidays observed are listed below. Exempt associates do not receive additional compensation for working observed holidays. Hourly/non-exempt associates who work during these days will receive the Holiday Pay Rate which is 1.5 pay for each hour worked. This is the same rate as the overtime (OT) rate. The associate receives the Holiday Pay Rate even if they are not already in OT. Eligibility of the Holiday Pay Rate does not require fulfillment of the 90-day probation period.

- New Year’s Day
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day
- Christmas Day
- Floating Holiday (Associate can request one floating holiday of their choice per calendar year.)

In order to be eligible for holiday pay for a holiday that is worked, the hourly/non-exempt associate must:

1. Be scheduled to work on the observed holiday.
2. Complete the associate’s regular shift on the observed holiday.
3. Did not call-off a scheduled shift in the pay-period in which the holiday occurs.

NOTE: An associate is not eligible for holiday pay for a holiday that falls during an unpaid leave of absence.

Special Days

Veritas provides time away from work without interruption of your regular pay or benefits for certain “special days.” These special days are defined below.

- **Leaves of Absence:** A leave of absence is a period of time when Associates’ absence from work is approved and any benefits accruing to an associate are continued. Leaves should normally be requested in advance.
 - Leaves of seven (7) days or longer must be requested in writing.
 - Available accrued PTO will be used along with the prior to the initiation of the Leave of Absence.
 - This Personal leave of absence is only eligible to associates who have met the 90 probationary period and can only last for 60 days.
 - Any time off past 60 days must be discussed with Executive Director (ED). When an emergency exists, a leave request may be made by phone to the ED; however, a written request must be submitted as soon as possible.
 - Veritas complies with the national Federal Medical Leave Act (FMLA). For more information see Appendix B of this handbook and refer to the federal link of www.dol.gov/general/topic/benefits-leave/fmla.
- **Bereavement Leave:** To help associates through the difficult period after the death of an immediate family member, Veritas grants up to three (3) days off for bereavement (prepare for funeral and/or attend the funeral). Every effort will be made to grant your request unless prohibited by unusual business needs or staffing requirements. Eligibility of this leave does not require fulfillment of the 90-day probationary period.
 - For the purpose of this policy, “immediate family” is defined to include: spouse, parents (including in-law), children, brother, sister, grandparents and grandchildren.
 - The associate is required to submit documentation to their supervisor or ED to confirm the family relationship.
 - Full time associates receive time off with regular pay for bereavement;
 - Part time associates receive time off without pay; however, they can use their PTO.
 - PRN associates can-receive time off without pay.

- Any approved days off must include the burial services.
- Any time in excess of three days must be approved by the ED.

- **Jury Duty:** Veritas grants time off for jury duty for non-probationary associates so they may meet their civic responsibility within the community. When an associate is summoned for jury duty, they must contact their supervisor immediately, but in no event less than two weeks prior to the date they are required to report. Eligibility of this leave does not require fulfillment of the 90-day probationary period.
 - Full-time and part-time associates are eligible for up to fifteen (15) days of jury pay for scheduled time missed.
 - Compensation will be limited to straight-time pay. When an associate is released from jury duty and all or part of their shift remains, they must contact their supervisor to determine if they must return to work.

- **Subpoena Duty:** In the case of a subpoena, an associate will be paid for no more than three (3) scheduled days to testify in court. Pursuant to specific-state law, the above parameters may vary. The ED will ensure compliance and update accordingly. Eligibility of this leave does not require fulfillment of the 90-day probationary period.

- **Military Leave:** Veritas is committed to protecting the job rights of associates absent on military leave. Associates should request military leave as far in advance as possible. While absent on military leave they remain in good standing, but do not receive pay.
 - Veritas will subsidize their group health care benefit for up to thirty (30) days.
 - Associates absent on military leave for thirty-one (31) days or longer are eligible for family health benefit coverage from the military.
 - Associates can also arrange to continue their coverage under the group health plan for up to eighteen (18) months under **COBRA at the full premium cost.**

- **FMLA Leave: Veritas complies with the national Federal Medical Leave Act (FMLA). Eligibility for FMLA requires a minimum of twelve (12) months of tenure. For more information see Appendix B of this handbook and use the federal link of www.dol.gov/general/topic/benefits-leave/fmla.**

Days Away Without Pay

Each Veritas community realizes that there are times when it may be necessary for the associate to be absent from work without pay. For these situations, the associate must contact their supervisor and/or the ED prior to the start of the associate's scheduled shift or work day. Examples of this situation are defined below.

- **Voting:** Veritas encourages every associate to exercise their voting privileges. Except in states that limit employers from interrupting regular wages to vote, each associate is expected to be able to vote prior to their shift or following their shift. If for some reason this is not possible, non-exempt associates are allowed to have up to three (3) hours away without pay to vote.

- **Personal Leave:** Associates who have successfully completed the probationary period and need additional time off in addition to accrued and available PTO may request a personal leave of absence without pay for up to thirty (30) days. Approval is subject to the associate's supervisor approval in collaboration with the ED. Job performance, absenteeism and departmental requirements will all be taken into consideration before a request is approved. The associate must return to work on the scheduled return date or be considered to have voluntarily resigned from their employment.

Group Insurance Program Overview

Each program year Veritas endeavors to offer the most competitive group insurance program available. The program includes both employer-paid and shared-costs as well as 100% paid costs by each participating associate for their optional choices.

- Eligibility occurs at designated times during the probationary period and annually at open enrollment.
- Each selection made by the associate is a contracted service and the options selected and costs are not eligible for revision unless an approved insurance-event/life change-event occurs in the plan year.
- The insurance carriers are pre-paid monthly by Veritas and the amount that the associate is responsible to reimburse occurs through payroll deduction through a Payroll/CAF 125 Plan. If the associate resigns and/or is terminated for cause and has worked one (1) day of any month, the entire premium(s) are payable and the associate is covered until the end of that month. Sometimes this requires the associate to write a personal check to Veritas to cover the monthly amount due.
- Some coverages are available through COBRA if the associate pursues coverage after separation of employment. The insurance carrier will contact the associate via their contact information on file.

Basic Life and AD&D Policy

Veritas funds 100% of a basic life insurance policy and accidental death & dismemberment policy for each eligible full-time associate (those working at least 30-hours per week in a calendar year and who are eligible base on their date of hire). The base amount is \$10,000.00 but actual coverage will vary based on the associate's age. Participation is required and you must provide your beneficiary details to the insurance representative during open enrollment and/or during new hire enrollment. Refer to the Benefits Guide Booklet for more details.

Employee Assistance Program (EAP)

The Basic Life and AD&D policy also provides an Employee Assistance Program (EAP) which is available to all full-time and part-time associates. The EAP helps promote well-being and helps enhance the quality of life for you and your family. Support and guidance is available for assistance with family and personal issues online at www.ibhworklife.com or email eapcounselor@ibhcorp.com or by calling **800.386.7055** (24 hours a day/days a week). For the benefit of the residents, you and/or your family, the company, your supervisor can instruct you to contact the EAP if they believe you need assistance.

Liability Insurance

In addition to the expectation that each Veritas associate is to perform their responsibilities properly and professionally at all times, liability insurance is included in the company's insurance package which covers individual associates in the performance of their duties at each Veritas community. Licensed staff may opt to purchase additional coverage with the carrier of their choice.

Unemployment Insurance

Each Veritas community is covered under statutory unemployment insurance laws. For more information, contact the appropriate state-specific regulation.

Workers' Compensation Insurance

Each Veritas community is covered under statutory state workers' compensation laws. Associates who sustain workplace injury or illness must immediately notify their supervisor, RCD, and the ED.

Workers' Compensation Insurance coverage is carried for every associate. It is important that you report any workplace injury or illness in writing immediately – regardless of how minor you may think it to be. Your supervisor (or you) must also report to the RCD and the ED during your shift or within 24-hours of the injury/illness so that proper documentation is completed. **All workplace injuries or illnesses that require medical attention require a drug screening in order to return and/or continue work duties.**

Veritas makes no claim on the benefits paid to the Veritas for medical costs incurred as a result of workplace accidents. The benefits are governed by statutory law and the insurance carrier.

Prior to an associate's return to work, after being absent because of a workplace injury or illness, the associate must provide their supervisor and the ED with the attending physician clearance/orders/work-restrictions based on the associate's job description. A call to the attending physician's office will be made to confirm this documentation. Failure to provide this documentation will delay the associate returning to work.

NOTE: All worker's compensation incidents and claims are subject to review and inquiry by the VP of Administration.

Group Employment Insurance Program

The following group insurance is offered for all eligible full-time associates (those working at least 30-hours per week in a calendar year). Participation occurs during open enrollment and during new hire enrollment. All participation is voluntary, but if you do not want to participate in the voluntary group plan you must waive coverage. If you waive coverage you will not be eligible for enrollment until the next annual enrollment and/or if an insurance-defined qualifying event occurs. For more information, refer to the Veritas Webfile library for details, or request a printed copy of enrollment instructions and Benefits Guide Booklet from your ED.

Medical Group Insurance

The Veritas Medical Insurance Plan currently has three (3) options. Veritas shares the cost of the employee-only coverage with the community's eligible associates by funding **\$281.62** a month towards the medical plan that the associate chooses. Regional and/or Home Office associates contact the VP of Administration for your options.

Any additional cost for the community associate and/or the cost for their dependent coverage is paid 100% by the associate. All costs incurred by the associate is through payroll pre-tax deduction. For more information, contact the ED/BOM or designee or the VP of Administration for questions of eligibility, required paperwork for newly hired associates, and open enrollment.

Part-time or PRN associates are not eligible for the Veritas Medical Insurance Plan.

Regular full-time associates become eligible for the Veritas Medical Insurance Plan as follows:

- Hourly/non-exempt associates are eligible on the first day of the first month following sixty (60) days of their date of hire (DOH).
- Salary/exempt associates are eligible on the first day of the first month following their date of hire (DOH).
- The associate's portion of medical coverage is paid through Payroll/CAF 125 Plan deduction.

- If any newly hired associate fails to complete the enrollment process, the associate will not be eligible for insurance coverage until the next annual open enrollment.
- Selections made are contracted through the plan year and cannot be revised unless an insurance-event/life event occurs and is confirmed.
- If an associate resigns and/or is terminated for cause and has worked one (1) day of any month, the entire premium(s) are payable and the associate is covered until the end of that month. Sometimes this requires the associate to write a personal check to Veritas to cover the monthly amount due.
- Following the completion of termination paperwork by the ED or designee, the ED or designee sends the Insurance Provider notice of termination and the Insurance Provider sends the separating associate the Information for Consolidated Omnibus Budget Reconciliation (COBRA) information to decide if they want to continued health coverage. The separating associate is responsible for the total cost of this coverage.

Optional Group Insurance

At the regular full-time associate's cost, a variety of optional insurance plans are available and paid through Payroll/CAF 125 Plan deduction. **Optional insurance plans follow the medical insurance enrollment requirements.**

- Accident: At the regular full-time associate's cost.
- Critical Illness: At the regular full-time associate's cost.
- Dental: At the regular full-time associate's cost.
- Life Insurance/Accidental Death & Dismemberment (AD&D): At the regular full-time associate's cost. (This coverage is in addition to what is paid by the company.)
- Long-Term Disability (LTD): At the regular full-time associate's cost. (TBD/Investigating Carriers.)
- Short-Term Disability (STD): At the regular full-time associate's cost.
- Vision: At the regular full-time associate's cost.
- Dependent Coverage: At the regular full-time associate's cost.

Disposition of Employer-Paid and/or Employee-Paid Insurance

Insurance coverage is based on an actual month (JAN – DEC). Veritas pre-pays the premium and the associate reimburses Veritas through payroll deduction or the associate provides a check due at the beginning of each month for their part of the premium. This means that usually the associate is reimbursing the Veritas in arrears. All employer-paid insurance and associate coverage terminates on the last day of the last month of your employment.

- However; since our pay periods overlap the actual month, usually the deductions for the last payroll will be doubled to make sure that Veritas has been appropriately reimbursed. See the Pay Period section of this Handbook to confirm your specific pay period schedule.
- The ED and/or designee will confirm the termination date vs. the pay period and determine if the full month's premium(s) is due or just a single pay-period due on the last payroll.

Following the completion of termination paperwork by the ED or designee, the ED or designee sends the Insurance Provider notice of termination and the Insurance Provider sends the separating associate the Information for Consolidated Omnibus Budget Reconciliation (COBRA) information to decide if they want to continued health coverage. The separating associate is responsible for the total cost of this coverage.

Group Insurance Questions

For more information on eligibility or enrollment or carrier information, refer to the Associate Benefits Guide and Election Forms on the website, and/or contact the Propel Insurance Representative, or ED/BOM or VP of Administration.

Appendix A – Staff Positions

Community Leadership

- Executive Director (ED)
- Resident Care Director (RCD), Assistant Resident Care Director, Memory Care Director
- Business Office Manager (BOM), and/or Administrative Coordinator
- Community Relations Director, Community Relations Coordinator
- Shift Nurse (NP, RN, LPN, LVN)
- Senior Resident Assistant (C N A, Medical Assistant, Medical Technician)
- Program Director
- Maintenance Director
- Dietary Manager/Chef/Lead Cook

Community Associates

- Clinical Staff: Resident Assistant (RA), Registered Dietician (RD).
- Dietary Staff: Dietary Assistant (Cook, Dishwasher).
- Maintenance Staff: Maintenance Assistant, Housekeeper.
- Office Staff: Administrative Assistant, Concierge/Receptionist, Departmental Assistant, Driver.

Regional and Home Office Associates

- Business Office Assistant
- Regional Director of Operations (DO)
- Regional Director of Clinical Services (DCS)
- Regional Director of Business Office Operations (DBOO)
- VP of Finance
- VP of Administration
- CEO/President/Owner

Appendix B – Compliance with Federal & State Regulations

Each Veritas community complies with all applicable federal and state regulations.

Americans with Disabilities Act (ADA) and (ADAAA)

Veritas will not unlawfully discriminate against qualified individuals with disabilities with regard to any aspect of their employment and complies with the Americans with Disabilities Act (ADA), as amended by the Americans with Disabilities Amendments Act. The ADA is a federal law that prohibit employers with 15 or more associates from discriminating against qualified applicants and individuals with disabilities and requires employers, when needed to provide reasonable accommodations to applicants and associates who are qualified for a job, with or without reasonable accommodations, so that they may perform the essential job duties of the position.

Veritas will reasonably accommodate qualified individuals with a disability so that they can perform the essential functions of a job unless doing so causes a direct threat to these individuals or others in the workplace and the threat cannot be eliminated by reasonable accommodation and/or if the accommodation creates an undue hardship as defined by law.

If you are currently disabled or if you become disabled during your employment and are in need of a reasonable accommodation to perform your duties, you are encouraged to come forward and request reasonable accommodation by contacting the RCD and ED. For more information on ADA refer to the federal link www.eeoc.gov/publications/ps-ada.cfm. For more information on ADAAA refer to the federal link www.eeoc.gov/laws/statutes/adaaa_info.cfm.

Equal Employment Opportunity Policy (EEO)

Equal Employment Opportunity (EEO) has been, and will continue to be, a fundamental principle at each Veritas community. Veritas prohibits unlawful discrimination because of race, color, sex, national origin, age, disability, genetic information, or any other characteristic protected under applicable law. This policy applies to all terms and conditions of employment which includes hiring, placement, promotion, recruitment, termination, layoff, recall, transfer, leaves of absence, compensation, and training.

Veritas expressly prohibits any form of unlawful associate harassment based on race, color, religion, sex, national origin, age, disability, genetic information, or any other characteristic protected under applicable law. Improper interference with the ability of associates to perform their expected job duties is absolutely not tolerated. For more information on EEO, refer to the federal link www.dol.gov/general/topic/discrimination.

Immigration Reform & Control Act of 1986

Veritas complies with federal and state laws and will not knowingly hire or continue to employ anyone who does not have the legal right to work in the United States.

All offers of employment are contingent on verification of your identity and right to work in the United States. Within your first 48-hours of employment you must provide original documentation which verifies your identity and right to work, including completion of Federal Form I-9, Employment Eligibility Verification Form. If any new hire does not comply, Veritas is obligated to terminate your employment. Former associates who are rehired must also complete this process. For more information on the immigration act, refer to the federal link www.usa.gov/immigration-and-citizenship.

Family and Medical Leave Act (FMLA)

Veritas complies with the Family and Medical Leave Act (FMLA). Upon hire, all new associates are provided with notices required by the U.S. Department of Labor (DOL) on Employee Rights and Responsibilities under the Family and Medical Act.

The function of this policy is to provide associates with a general description of their FMLA rights. In the event of any conflict between this policy and the applicable law, associates will be afforded all rights required by law.

Under this policy, Veritas will grant up to 12 weeks (or up to 26 weeks of military caregiver leave to care for a covered service member with a serious injury or illness) during a 12-month period to eligible associates. The leave may be paid, unpaid or a combination of paid and unpaid leave, depending on the circumstances of the leave and as specified in this policy.

If you have any questions, concerns or disputes with this policy, you must contact the ED or designee in writing. For more information on FMLA, refer to the federal link www.dol.gov/general/topic/benefits-leave/fmla.

Appendix C – Anti-Harassment Policy and Complaint Procedure

Each Veritas community is committed to a work environment in which all individuals (residents and associates) are treated with respect and dignity. Each associate has the right to work in a professional atmosphere that promotes Equal Employment Opportunity (EEO) and prohibits discrimination practices, including harassment, intimidation, hostility or other offenses which might interfere with work performance. Therefore, Veritas expects that all relationships among individuals (associate, applicant, vendor, resident, or resident family member) in the workplace/community will be professional and free from any form of harassment.

Harassment can constitute discrimination and can be illegal under federal, state, and local laws. Harassment on the basis of any protected characteristics under applicable law is strictly prohibited. Harassment of any form by any individual will not be tolerated.

Definitions of Harassment

Veritas defines harassment includes:

- Intimidation, hostility, or other offenses that interfere with work performance,
- Presence of any bias or prejudice,
- Any action or inaction that leads to discrimination,
- Any hostility: verbal, physical, or visual (subtle or not so subtle behaviors)
- Any sexual (subtle or not so subtle behaviors)
 - For the purposes of this policy, sexual harassment is defined as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example a) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; b) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or c) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.
 - Sexual harassment may include a range of subtle and not-so-subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering, whistling or touching; insulting or obscene comments or gestures; display in the workplace of sexually suggestive objects or pictures; and other physical, verbal or visual conduct of a sexual nature.

Harassment on the basis of any other protected characteristic under applicable law is also strictly prohibited. Under this policy, harassment is verbal, written or physical conduct that denigrates or shows hostility or aversion toward an individual because of their race, color, religion, sex, national origin, age, disability, genetic information or any other characteristic protected by applicable law or that of their relatives, friends or associates, and that:

- a. Has the purpose or effect of creating an intimidating, hostile or offensive work environment;
- b. Has the purpose or effect of unreasonably interfering with an individual's work performance; or
- c. Otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes epithets, slurs or negative stereotyping; threatening, demeaning, intimidating or hostile acts; denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group and that is placed on walls or elsewhere on Veritas community premises or circulated in the workplace, on Veritas time or using Veritas equipment via e-mail, phone (including voice messages), text messages, tweets, blogs, social networking sites or other means.

Vericare Response Line

An inquiry hotline hosted by Frontline Call Center (a national leader in customer service) is available 24/7. For Veritas this service is called the Vericare Response Line. This inquiry hotline is provided for associate concerns and resident care concerns when either feels dis-satisfaction from a response by community leadership, etc.

This inquiry hotline does not replace the complaint procedure outlined in this Appendix. It is intended to serve as an enhancement to the chain of command; providing real-time valuable information and input. Anyone that feels that they are being treated unfairly and/or feels that a resident is being placed at risk is encouraged to contact the Vericare Response Line. The Vericare representative will take your information and assure that it is provided to the correct department for resolution. Refer to Appendix H.

Individuals and Conduct Covered

These policies apply to all applicants and associates, whether related to conduct engaged in by fellow associates or residents or someone not directly connected to a Veritas community (e.g., an outside vendor/healthcare provider). Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and Veritas-related social events.

Process for Concerns or Complaint

Individuals who have a concern and/or believe that they have been the victim of conduct prohibited by this policy statement or who believe they have witnessed such conduct should promptly discuss their concerns with their immediate supervisor and the ED and/or Regional Director of Operations (RDO). When possible, Veritas encourages individuals who believe they are being subjected to such conduct to promptly advise the offender that their behavior is unwelcome and request that it be discontinued. Often this action alone will resolve the problem. Veritas recognizes, however, that an individual may prefer to pursue the matter through complaint procedures.

- The typical process includes the Veritas associate with the concern contacting their supervisor and the ED. If the associate is not comfortable with contacting their supervisor or the ED, they should contact their RDO and the VP of Administration.
- The associate is encouraged to directly communicate with the alleged harasser and make it clear that their behavior is unacceptable, offensive or inappropriate. It is not required that associate do so; however, it is required that the associate notifies their supervisor and ED or designee. If the harasser is the ED or RDO, you are to contact the VP of Administration.
- Once notified, the ED/RDO/HRD will facilitate an investigation. Prompt action to correct any violation will be taken which includes disciplinary action up to and including termination of staff or vendors.

Any reported allegations of harassment, discrimination or retaliation will be investigated promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge.

Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action.

Retaliation against an individual for, in good faith, reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or

discrimination itself, will be subject to disciplinary action. Any act of retaliation should be reported immediately and will be promptly investigated and addressed.

Misconduct constituting harassment, discrimination or retaliation will be dealt with appropriately.

If a party to a complaint does not agree with its resolution, that party may appeal to the VP of Administration or CEO/President/Owner.

False and malicious complaints of harassment, discrimination or retaliation may be the subject of appropriate disciplinary action including termination and/or eviction for a resident.

Appendix D – Electronic Communication and Internet Use

The following guidelines have been established for using **all** Veritas systems and services via the internet/email and electrical devices to assure appropriate, ethical, and professional practices:

- Veritas systems and services include any company owned hardware, software, email address, website, password/passcodes/pin numbers, or social media site.
- Veritas systems and services may not be used for transmitting, retrieving or storing any communications of a defamatory, discriminatory, harassing or pornographic nature.
- The following actions are forbidden on Veritas systems and services: using disparaging, abusive, profane or offensive language; creating, viewing or displaying materials that might adversely or negatively reflect upon Veritas or be contrary to the best interests of a Veritas community; and engaging in any illegal activities, including piracy, cracking, extortion, blackmail, copyright infringement, etc.
- Unauthorized access of Veritas systems and services is prohibited.
- Associates **may not or allow others to:**
 - Copy, retrieve, modify or forward copyrighted materials, except with permission or as a single copy to reference only.
 - Use Veritas systems or services that disrupts its use by others.
 - Send or receive large files that could be saved or transferred via thumb drives.
 - Send or receive files that are not related to Veritas work.
- Associates should not open suspicious e-mails, pop-ups or downloads. Instead, contact the community's designated technology third-party vendor with any questions or concerns to reduce the release of viruses or to contain viruses immediately.

NOTE: Internal and external e-mails are considered business records and may be subject to discovery in the event of litigation. Be aware of this possibility when sending e-mail within and outside the Veritas community.

Right to Monitor

All Veritas systems and services and work-related records belong to Veritas and not to the associates.

Veritas routinely monitors use of Veritas systems and services.

Inappropriate or illegal use of Veritas systems and services may be subject to disciplinary action up to and including termination of employment as well as legal proceedings.

Appendix E - Social Media & Network Policy — Acceptable Use

The following guidelines have been established for Veritas social media outlets and networks.

Associates (current or past) may not post financial, confidential, sensitive or proprietary information about the Veritas community including residents, guests, third-party vendors/healthcare providers, associates or applicants. Violation of this policy will result in severe penalties including HIPAA penalties.

Associates may not post obscenities, slurs or personal attacks that can damage the reputation of Veritas community including residents, guests, third-party vendors/healthcare providers, associates or applicants.

Veritas highly recommends that associates **do not** accept friend requests from residents/resident families or fellow staff or interact with either in their personal social media sites to assure that their personal lives and professional responsibilities are not impacted and become in conflict. Each community's Facebook (FB) page provides ample interaction between residents, families, and staff.

When posting on their personal social media sites, associates must use the following disclaimer if they choose to discuss Veritas job-related matters, *"The opinions expressed on this site are my own and do not necessarily represent the views of my employer – Veritas."*

Right to Monitor

Veritas routinely monitors content found on the Internet.

Any policy violations may result in discipline up to and including termination of employment as well as legal proceedings.

Appendix F – Access, Solicitation, Distribution or Posting of Materials on Veritas Premises

Each Veritas community limits access to the premises and prohibits the solicitation, distribution or posting of materials on or at the community’s premises which includes Veritas social media outlets (see Appendix E) by any associate or non-associate, except as may be permitted by this policy.

The sole exceptions to this policy are charitable and community activities supported by Veritas and Veritas-sponsored programs related to the Veritas community, and/or pre-approved by the ED.

Access Provisions:

- Former associates are not permitted onto Veritas community premises without prior approval of the ED.
- Associates may only admit non-associates to work areas with ED pre-approval or as part of a Veritas-sponsored program.
 - These visits should not disrupt workflow.
 - An associate must accompany the non-associate at all times.

Solicitation, Distributions and Posting of Materials:

- Non-associates may not solicit associates or residents, or distribute literature of any kind on Veritas premises at any time.
- Associates may not solicit other associates during work times, except in connection with a Veritas-approved or sponsored event, or during break times which do not affect resident care.
- Associates may not distribute literature of any kind during work times or in any work area at any time, except in connection with a Veritas-sponsored event.
- The posting of materials or electronic announcements are permitted with approval from the ED or designee.

Violations:

Any policy violations may result in discipline up to and including termination of employment as well as legal proceedings.

If the ED or Home Office deems it appropriate, law enforcement measures will be utilized.

Appendix G – Lactation/Breastfeeding

For up to one year after a child's birth, any associate who is breastfeeding a child will be provided reasonable break times as needed to express breast milk for her baby. See the Resident Care Director (RCD) for the designated room designated for each community.

A small refrigerator reserved for the specific storage of breast milk is available. Any breast milk stored in the refrigerator must be labeled with the name of the associate and the date of expressing the breast milk. Any nonconforming products stored in the refrigerator may be disposed of. Associates storing milk in the refrigerator assume all responsibility for the safety of the milk and the risk of harm for any reason, including improper storage or refrigeration and tampering.

The nursing parent/guardian wishing to use this room must request/reserve the room in writing with the RCD. Additional rules for use of the room and refrigerator storage are posted in the room. Associates who work off-site or in other locations will be accommodated with a private area as necessary.

Breaks of more than 20 minutes in length will be unpaid, and the associate should indicate this break period on her time record.

Appendix H – Vericare Response Line

The Vericare Response Line is scheduled to be replaced in 2022. More details to follow; however, below is how the current Vericare Response Line operates.

Veritas endeavors that all comments and concerns are received and handled in a proactive manner. To assist with this goal, an inquiry hotline hosted by Frontline Call Center (a national leader in customer service) is available 24/7 by dialing 800.291.6768. For Veritas this service is called the Vericare Response Line.

Each community posts the Vericare information in the associate breakroom and provides a Vericare handout to each associate upon hire, and also includes the information in the resident agreement packet.

This inquiry hotline does not replace the leadership of the community, but serves as an additional means of communication so that associates and residents (and their families) can share questions, concerns, suggestions, and praises.

The information from your call is directed to the appropriate Veritas department.

Appendix I – New Associate Orientation Documentation Form (Sample)

Community: _____

Associate Name: _____ Title/Jdesc: _____ DOH: _____

Orientation Schedule: (start date) _____ (end date) _____

Orientation/Training Subject	Date Completed	Associate Initials	Trainer Initials
<i>All Associates</i>			
Company History, Mission, Culture, Philosophy and Structure			
Industry Marketplace Position, Competition			
General Policies & Acknowledgements			
Associate Handbook			
Contact Information (Associate & Supervisors)			
Code of Ethics			
ED Quick Start (ED, BOM, RCD, Regionals)			
Community-Specific Policies & Procedures			
Background Checks			
Drug Testing & Search			
Immunization/Screening/Vaccine (HEP B, TB, etc.)			
HIPAA (Resident Confidentiality & Company Confidentiality)			
No Call / No Show Policy			
Smoking Policy (Any tobacco or vaping products)			
Telephone: Landline /Mobile Use (By Associates)			
Internet Use (By Associates)			
Social Media Use (By Associates)			
Vericare Hotline			
Weapon Policy			
Other:			
Other:			

Orientation/Training Subject	Date Completed	Associate Initials	Trainer Initials
Pay Policies & Acknowledgements			
Benefits / Group Insurance Enrollment			
Classifications (RFT, RPT, PRN)			
<ul style="list-style-type: none"> • Hourly/Non-Exempt (Gets OT Pay) 			
<ul style="list-style-type: none"> • Salary/Exempt (Does Not Get OT Pay) 			
Compensation			
<ul style="list-style-type: none"> • Offer Letter 			
<ul style="list-style-type: none"> • Overtime Authorization 			
Expense Reimbursement Policy			
Meal & Rest Breaks (Meal provided on Shift)			
Payroll Distribution & Pay Periods			
PTO / Leave Requests			
Schedules / Staffing			
Time Clock / Timekeeping Procedures/ Time Clock Edits			
Work Day & Work Week			
Other:			
Other:			
Associate Development			
Job Description & Requirements			
90-Day Probationary Period			
Training Requirements/Opportunities/Note to File			
Trainer/Mentor to Trainee Expectations			
Maintaining Expertise with State Regulations			
Other:			
Other:			
Other:			

Environmental & Workplace Safety	Date Completed	Associate Initials	Trainer Initials
Workplace Safety Program			
Workman’s Compensation Procedures			
SDS (Safety Data Sheets for Chemicals, etc.)			
OSHA Compliance & Reporting			
Emergency Management Plan (EMP)			
<ul style="list-style-type: none"> • Drills (Fire & Life Safety) 			
<ul style="list-style-type: none"> • Evacuation 			
<ul style="list-style-type: none"> • Staff Preparedness 			
Dumpster / Refuse Removal			
Community System(s) Orientation			
<ul style="list-style-type: none"> • Doors (Interior & Exterior) 			
<ul style="list-style-type: none"> • Electrical & Electrical Panel(s) 			
<ul style="list-style-type: none"> • Elevator(s) 			
<ul style="list-style-type: none"> • Emergency Alarm(s) 			
<ul style="list-style-type: none"> • Emergency Generator 			
<ul style="list-style-type: none"> • Emergency Lighting 			
<ul style="list-style-type: none"> • HVAC (Heat & Air Conditioning) 			
<ul style="list-style-type: none"> • Gas Shut-off 			
<ul style="list-style-type: none"> • Irrigation 			
<ul style="list-style-type: none"> • Pest Control Services 			
<ul style="list-style-type: none"> • Plumbing 			
<ul style="list-style-type: none"> • Security System/Key Pad/Code(s) 			
<ul style="list-style-type: none"> • Sprinkler and Fire Extinguisher(s) 			
<ul style="list-style-type: none"> • Thermostat(s) 			
<ul style="list-style-type: none"> • Water Shut-off 			
<ul style="list-style-type: none"> • Other: 			
<ul style="list-style-type: none"> • Other: 			
<ul style="list-style-type: none"> • Other: 			

Orientation/Training Subject	Date Completed	Associate Initials	Trainer Initials
Professionalism & Hospitality Services			
Best first impressions begin with Caring, Passion, & Respect towards prospects, residents, visitors, and staff.			
Proper behavior/etiquette by staff (see Code of Ethics)			
<ul style="list-style-type: none"> • Front desk/Lobby area/Reception 			
<ul style="list-style-type: none"> • Answering or Sending texts, emails, voicemail, and/or phone calls. 			
Transportation/Community Shuttle Service			
<ul style="list-style-type: none"> • Resident medical appointments & activities 			
<ul style="list-style-type: none"> • Availability is based on schedule and weather 			
<ul style="list-style-type: none"> • Program Director coordinates schedule 			
<ul style="list-style-type: none"> • Transportation & Driver Policies/Procedures 			
ALF & Memory Care Associates			
Resident Rights			
RCD & Nurse Handbook (All ALF & MC Staff)			
Resident Emergencies			
Basic CPR / First Aid Training			
Basic Infection Control/Protocol			
911			
Resident Care & Reporting			
2-Hour Minimum Check Policy			
Accident / Incident Reporting / Reporting Tree			
Adverse Incident Reporting / Reporting Tree			
Behavior Observation / Reporting			
Change of Condition / Reporting			
E-Call / Pendant Service & Response Times			
Fall Risk & Response			

Orientation/Training Subject	Date Completed	Associate Initials	Trainer Initials
Resident Care & Reporting			
<ul style="list-style-type: none"> Identifying / Assessment(s) / Compliance 			
<ul style="list-style-type: none"> Protocol(s) / Mitigation 			
<ul style="list-style-type: none"> Shared Risk Agreement 			
Nutritional Needs for Elderly			
<ul style="list-style-type: none"> Meals 			
<ul style="list-style-type: none"> Hydration 			
<ul style="list-style-type: none"> Snacks 			
<ul style="list-style-type: none"> Physician Orders / Allergies / Diabetic Diet 			
Skin Care Observation & Reporting			
Shift Exchange Report			
ALF & Memory Care Associates			
ALF & MC Infection Control			
Avoiding Needle Stick / Sharps Injury			
Biohazard			
Bloodborne Pathogens			
Contagions			
Communicable Diseases			
Other:			
Medication Management / Administration (per state-specific regulations)			
EMAR / MAR			
Assistance with Self-Administration			
Staff Administered Medication			
<ul style="list-style-type: none"> Nurse(s), or 			
<ul style="list-style-type: none"> Sr. RA who are C N A, C M A, MT/MA (per specific-state regulations), or 			
<ul style="list-style-type: none"> Med-Delegated RA in Texas. 			
<ul style="list-style-type: none"> Other: 			

Orientation/Training Subject	Date Completed	Associate Initials	Trainer Initials
Medication Management / Administration (per state-specific regulations)			
Medication Error Prevention			
Medication Error Reporting			
ALF & MC General Policies & Procedures			
Residents Assessments (All Types)			
Resident Care Introduction & Guidelines			
Resident Medical Chart / Charting			
Resident Service Plan (RSP)			
Resident Observation & Re-Direct & Reporting			
Resident Activity Plan (Customized & Group Offerings)			
Activities of Daily Living (ADL / ADLs)			
Elopement/Attempted Elopement/Missing Resident			
End of Life Care			
<ul style="list-style-type: none"> • Advanced Directives / DNR, etc. 			
<ul style="list-style-type: none"> • Hospice 			
Fall Prevention & Protocols / Response			
HIPAA (Resident Confidentiality)			
Therapy / Third-Party Medical Provider(s)			
Other:			
Other:			
ALF & MC Housekeeping / Laundry			
Housekeeping Schedule			
Laundry Schedule			
<ul style="list-style-type: none"> • Clean Linen Services 			
<ul style="list-style-type: none"> • Soiled Laundry/Linen Area 			
<ul style="list-style-type: none"> • Other: 			

Orientation/Training Subject	Date Completed	Associate Initials	Trainer Initials
Memory Care Associates			
State Rules & Regulations for MC Units			
Basic Orientation			
<ul style="list-style-type: none"> • St. Gabriel MC Operation Manual 			
<ul style="list-style-type: none"> • St. Gabriel MC Program Manual 			
<ul style="list-style-type: none"> • Learning Management System (Collins Learning) for continued education/training/certificates. 			
Additional Community Required Training/Topics:			
1.			
2.			
State Specific ALF & MC			
FLORIDA			
Florida 2-HR Pre-Service Orientation Requirement			
<ul style="list-style-type: none"> • Tour & Layout (45 Minutes) 			
All Common Areas			
Employee Only Areas			
Resident Apartments			
Laundry & Soiled Linen Areas			
Soiled Diaper Areas			
Supply Areas			
<ul style="list-style-type: none"> • Resident Care Procedures (45 Minutes) 			
License Type & Services			
Mission Statement (Care, Passion, Respect)			
Roster of Resident Names & Apt Numbers			
Observation & Reporting Change of Condition or Health Changes			
Fall Procedures & Protocols			
Incident Reporting			
Resident Bill of Rights with Examples			

Orientation/Training Subject	Date Completed	Associate Initials	Trainer Initials
FLORIDA			
<ul style="list-style-type: none"> • Emergency Procedures (20 Minutes) 			
<ul style="list-style-type: none"> • Fire Alarm Procedures & Protocols 			
<ul style="list-style-type: none"> • Fire Extinguisher Locations 			
<ul style="list-style-type: none"> • Evacuation Zone Locations 			
<ul style="list-style-type: none"> • Staff Rules & Code of Conduct (10 Minutes) 			
<ul style="list-style-type: none"> • Certificate of Training Completed (Printed/Distributed/Filed) 			

OTHER / NOTES:

Signature: _____

Date: _____

Trainer Signature: _____

Date: _____

Trainer Signature: _____

Date: _____

Trainer Signature: _____

Date: _____

ED Signature: _____

Date: _____

Appendix J – Associate Exit Interview (Sample)

Community Name: _____ Termination Date: _____

Associate Name: _____ Job Title: _____

Reason for Termination

Voluntary

Involuntary

Another Position

Attendance

Personal Reasons

Violation of Company Policy

Relocation

Lay Off

Retirement

Reorganization

Return to School

Position Eliminated

Other _____

Other _____

Employee Comments:

Interviewer Comments:

Associate Signature: _____ Date: _____

Interviewer Signature: _____ Date: _____

Questionnaire

1. What is your primary reason for leaving? _____

2. Did you understand what was expected of you? Yes or No _____

3. What did you find most satisfying about our job? _____

4. What did you find most frustrating about your job? _____

5. What suggestions or changes do you recommend for Veritas? _____

6. Would you recommend Veritas as a good place to work? Yes or No _____

7. Would you consider returning to Veritas in the future? Yes or No _____

Appendix K - Associate Handbook Acknowledgment and Receipt

I have received my copy of the Associate Handbook.

The associate handbook describes important information about Veritas, and I understand that I should consult my supervisor or Executive Director (ED) regarding any questions not answered in the handbook. I have entered into at will employment with Veritas voluntarily and acknowledge that there is no specified length of employment. Accordingly, either I or Veritas can terminate the relationship at will, with or without cause, at any time, so long as there is not violation of applicable federal or state law.

I understand and agree that only the Veritas CEO/President/Owner is the only company representative that can enter into an agreement for employment which is not at will employment, and that any such agreement must be properly signed and executed by both the individual and the Veritas CEO/President/Owner.

This handbook and the policies and procedures contained herein supersede any and all prior practices, oral or written representations, or statements regarding the terms and conditions of my employment with Veritas. By distributing this handbook, Veritas expressly revokes any and all previous policies and procedures that are inconsistent with those contained herein.

I understand that, except for employment-at-will status, any and all policies and practices may be changed at any time by Veritas, and that Veritas reserves the right to change my hours, wages and working conditions at any time. All such changes will be communicated through official notices, and I understand that revised information may supersede, modify or eliminate existing policies. Only the ED in collaboration with written documentation and approval from the Veritas Home Office has the ability to adopt any revisions to the policies in this handbook.

I understand and agree that nothing in the Veritas Associate Handbook creates, or is intended to create, a promise or representation of continued employment and that employment at Veritas is employment at will, which may be terminated at the will of either myself or Veritas. Furthermore, I acknowledge that this handbook is neither a contract of employment nor a legal document.

I have received the handbook, and I understand that it is my responsibility to read and comply with the policies contained in this handbook and any revisions made to it.

Print Associate's Name

Associate's Signature

Date

TO BE PLACED IN ASSOCIATE'S PERSONNEL FILE