



Sultana New Ventures, LLC Employee Handbook

July 23, 2021

Table of Contents

| | |
|---|-----------|
| Receipt of Employee Handbook | 5 |
| Current Staffing References | 6 |
| Section I: Sultana – Who We Are – An Introduction | 7 |
| History | 7 |
| Origin of the Sultana Name | 8 |
| Guiding Principles of Foraker | 9 |
| Sultana Board | 9 |
| Section II: General Policy | 10 |
| Intent of the Sultana Employee Handbook | 10 |
| Authority and Responsibility | 10 |
| Nature of Employment | 11 |
| Equal Opportunity | 11 |
| Disability Provision | 11 |
| Introductory Period | 12 |
| Employee Protection Policy (also known as Whistleblower Policy) | 12 |
| Section III: Employee Classifications | 13 |
| Full-time Employee | 13 |
| Part-time Employee | 13 |

Temporary Employee 13

Non-exempt Employee 13

Exempt Employee 13

Section IV: Standards of Conduct and Expectations..... 14

Employee Conduct..... 14

Anti-harassment 14

Workplace harassment..... 14

Anti-bullying 16

Outside Activities and Conflicts of Interest 17

Attendance and Punctuality 18

Personal Appearance..... 18

Electronic Communication Policy 18

Confidentiality 20

Media Inquiries..... 20

Safety..... 20

Salary Administration 21

Overtime and Time Reporting 21

Workweek and Schedule 21

Payroll Advances..... 22

Expense Reimbursement..... 22

Personnel Records..... 23

Emergency Office Closure Policy 23

Section VI: Employee Benefits 25

- Health Benefits – Medical, Dental, and Vision 25
- Life Insurance and Accidental Death and Dismemberment Benefits 25
- Long-Term Disability Benefits 25
- Employee Assistance Program (EAP) 25
- Retirement Benefits 25
- Paid Time Off (PTO) 26
- Donated Leave Policy 27
- Family Leave 28
- Administrative Leave 29
- Bereavement/Emergency Leave 29
- Leave Without Pay 30
- Holidays 30
- Jury Duty and Witness Leave 31
- Military Leave 31
- Workers’ Compensation 32
- Workplace Wellness 32
- Section VII: Alcohol and Drug-Free Workplace 33**
- Section VIII: Employee Feedback and Reviews 35**
 - Performance Evaluations 35
- Section IX: Performance/Conduct Issues and Separations 36**
 - Performance or Conduct Issues/Corrective Action 36
 - Separation 36
 - Final Pay 37

Section X: Raising Issues and Addressing Complaints 38
Section XI: Related Documents 39

Receipt of Employee Handbook

I have received a copy of the Sultana New Ventures, LLC's (Sultana) Employee Handbook dated July 23, 2021. I understand that this handbook replaces all previous versions of the employee handbook.

I have reviewed this Handbook and Guiding Documents and understand it is my sole responsibility to ensure my compliance with the policies and practices as set forth in this document. I understand that failure to comply with these policies and practices at any time may result in my immediate termination. I understand the receipt of these policies does not absolve me of any responsibility to comply with future changes in policy and/or practice. I agree that if there is any policy or provision in the employee handbook that I do not understand, I will seek clarification from my direct supervisor, the Director of Sultana, or from the Senior Director of Human Resources.

I also understand that my employment with Sultana is considered at-will. I understand that this employee handbook is not intended or implied to be an employment contract.

I understand that this employee handbook may not address every situation that may arise in the course of my employment. I also understand that these policies and procedures are continually evaluated and may be amended, modified, or terminated at any time.

Name (print) _____

Signature _____ Date _____

NOTE: The original of this form will be placed in the employee's personnel file, and a copy will be returned to the employee.

Current Staffing References

This document refers to positions, not current staff. To limit confusion the following positions referenced in this document are currently held by:

| | |
|-------------------------------------|-----------------|
| President/CEO: | Laurie B. Wolf |
| Vice President/CFO: | Raju Shankar |
| Vice President of Programs: | Chellie Skoog |
| Director of Sultana: | Kimberly Waller |
| Senior Director of Human Resources: | Rebecca Savidis |

Section I: Sultana – Who We Are – An Introduction

The Foraker Group is a nonprofit organization whose purpose is to strengthen the nonprofit sector in Alaska. As a single member LLC in which Foraker is the sole member, Sultana has the same core purpose to strengthen the nonprofit sector as does Foraker.

Sultana’s core values are words that motivate us to achieve our core purpose by weaving the ideas into every product and service we offer. Sultana’s core values:

- Neutral space (*safe space to learn, politically neutral, accountability*)
- Collaboration (*convener, connector, catalyst*)
- Systems change (*transformational, not transactional*)

While several other Alaska organizations currently offer fiscal sponsorships, none provide capacity building services. Sultana’s service, political neutrality, and nonprofit focus and expertise create a transformational experience for Alaska organizations, funders, and leaders – rather than a transactional experience like most traditional fiscal sponsorships.

As an integral part of Foraker, Sultana also fully embraces Foraker’s core values of Sustainability – Strategic – Collaborative – Urban/Rural/Native/Non-Native. The last value reflects our acknowledgement of the land where we live, our commitment to serving nonprofits and tribes in urban and rural Alaska, and our obligation to address the systemic racism and oppression that is deeply rooted in our history as a state. It is from this core value that we begin our understanding of other oppressive systems and structures in our sector that impact people of color, people who experience disabilities, and people who have been subjected to gender and sexual orientation bias. We are committed to living our core values in all that we do to serve the nonprofit sector in Alaska.

Sultana’s main line of business is fiscal sponsorship including incubation, navigation, and capacity building.

History

Formed in October 2013 by The Foraker Group, Sultana New Ventures LLC (“Sultana”) is an incubator providing fiscal sponsorships and capacity building services to grow projects, collaborations, or organizations from the preliminary stages of their development to stability, allowing them to take their next step to independence, merger, or completion. Sultana offers an opportunity to nurture a good idea, employ staff, and provide the stability that funders need to make investments. This safe space to determine the right next steps also allows collaborations to take root and prevents new nonprofits from forming without a long-term trajectory for success.

Sultana was formed as part of a response to two key areas of growth: 1) An increasing number of nonprofits in Alaska. This growth had made it particularly difficult for organizations to fill key staff positions and recruit board members. Research compiled by Foraker for its 2011 *Report on the Alaska Nonprofit Economy* found that the number of Alaska nonprofits had increased by 17% between 2007 and 2010 – from 6,000 organizations to approximately 7,000. To put that in perspective, one nonprofit existed in Alaska for every 100 individuals living in the state – a figure higher than any other state per capita. 2) A recognition that solving community issues would require less single nonprofit focus and more emphasis on a system of collaboration. New systems would need a “backbone” of stability in order to effectively focus on unmet community issues. Fast forward, we see more clearly that Sultana can also offer a backbone of support as a “forever home” for small groups who want to provide health insurance and other supports for staff and new structures.

Understanding that not every new idea, project, or collaboration needs a new nonprofit, and that not every nonprofit is ready to stand on its own, Sultana was envisioned as an opportunity that would allow a neutral space for organizational leaders to focus on mission rather than on creating a business infrastructure. This arrangement was not viewed as a long-term strategy. Instead, it would allow an idea to germinate until it is ready to truly grow into its own system or structure, or merge into something else, or stop.

During the first three years of its operations (Phase 1), Sultana was not promoted to either funders or organizations. This was intentional to allow adequate time and research to develop systems, procedures, policies, and other infrastructure that were needed to ensure success. Still, Sultana took on a limited number of clients and offered some capacity building services to organizations for which it was a fiscal sponsor. These services were considered to be beneficial for both the clients and Foraker staff. However, Sultana leadership recognized that the incubation relationship could be stronger with clearer client and staff expectations, more streamlined services, and a more realistic cost structure.

Phase 2 ran from January 1, 2018 to December 31, 2019. The objectives of this phase were to clearly articulate the value offered by Sultana (focusing on its capacity building and incubating services) and determine the cost structure that will result in long-term financial viability. The role of the Sultana “navigator,” was instituted as a fundamental piece of capacity support and to provide oversight and guidance.

Phase 3 is now in effect with a goal to fully scale the service to meet mission needs across Alaska and provide a more equitable space to see new nonprofit leaders and ideas flourish.

Origin of the Sultana Name

Our name is derived from a particular place that is part of the rugged Alaska landscape and exemplifies partnership. Standing next to Denali is a lesser-known peak called Sultana, or Mount

Foraker. Back in 2001, Foraker seemed an appropriate name for our newly founded organization. We viewed Denali as a metaphor for the nonprofit sector with Mount Foraker/Sultana standing right next to it. Foraker/Sultana is part of the landscape but does not overshadow Denali, the highly esteemed landmark for Alaskans.

Guiding Principles of Foraker

Because Foraker and Sultana are interconnected, we include Foraker's guiding principles as a basis for the whole of Foraker and Sultana to explain how the staff of both operate. These principles and other guiding documents can be found in Section XI Related Documents. We recognize that the individual projects within Sultana will develop their own culture and guiding principles. As long as they do not go against the Foraker/Sultana principles, they can stand.

Sultana Board

Sultana's board is comprised of three people: Foraker's attorney, a member of the Foraker Governance Board, and one other member closely connected to Foraker. As a single member LLC in which Foraker is the sole member, the board acts independently in its decisions but coordinates closely with Foraker.

Foraker's President/CEO is responsible for the oversight and management of Sultana. They do that in concert with several leadership team members including Foraker's Vice President/CFO, Vice President of Programs, and the Director of Sultana.

The Sultana board meets quarterly. Board meetings are a time for the board to fully engage on issues that positively meet mission. Appropriate staff are invited to attend as a resource.

Section II: General Policy

Intent of the Sultana Employee Handbook

Employees in this handbook always refer to “project employees,” because Sultana itself does not have direct employees. All support staff including the President/CEO are Foraker employees and are held accountable to the Foraker Employee Handbook (September 24, 2020).

The intent of this employee handbook is to maximize Sultana’s effectiveness. It is designed to acquaint project employees with Sultana and provide them with information about working conditions, employee benefits, general expectations, and roles and responsibilities, along with policies or practices affecting their employment including all applicable federal, state, and local laws. Sultana project employees are expected to read, understand, and comply with all provisions of this handbook.

If any part of Sultana’s policies or practices conflict with any law or any rule, regulation and/or condition mandated by any funding source or regulatory body, those regulatory specifications shall prevail. Each project of Sultana may have additional operating principles and processes, which should be accessed directly from your supervisor.

No handbook can anticipate every circumstance or answer every question related to Sultana’s policies, procedures, and practices. As Sultana continues to grow, policies in the handbook may need to be revised, supplemented, suspended, or rescinded. Sultana, therefore, in its sole and absolute discretion, reserves the right to revise, supplement, suspend or rescind any policies or portion(s) of policies and practices as deemed appropriate at any time, without prior notice. Any such changes will apply to existing and future employees. Furthermore, no statement of promise by a Sultana or project supervisor or manager may be interpreted as a change in policy nor will it constitute an agreement with an employee contrary to any policy specified in this handbook.

Authority and Responsibility

The Sultana Board is the governing and fiduciary body and is responsible for establishing policies for the overall operation of the organization.

Foraker’s President/CEO is responsible to the board for administering the organization according to the policies established by the board.

Sultana serves as the employer of record for staff members of Sultana projects. The President/CEO also has complete authority and responsibility to hire and discharge all employees and will do that through consultation with each project advisory board.

Project employees will be supervised and evaluated by their supervisor and/or advisory board. All decisions regarding employment, discipline, and direction of project employees are the

responsibility of Sultana's President/CEO with advice provided by their supervisor and/or advisory board who act to support Sultana with regard to employees only.

Employees have a responsibility to know, understand and uphold all Sultana policies including the code of ethical behavior, conflict of interest policy, travel policy, and the staff and consultant principles.

Nature of Employment

This employee handbook is not an employment contract and is not intended to create contractual obligations of any kind. Sultana employment is not for a specified period of time and this handbook does not limit Sultana's right to terminate employment at any time for any reason or no reason. No supervisor or manager is authorized to enter into anything other than an at-will employment relationship with any employee on behalf of Sultana.

Equal Opportunity

Sultana intends to comply with all applicable federal, state, and local laws. Accordingly, it is Sultana's policy to offer equal employment opportunities including recruiting, hiring, training, and promoting without regard to race, religion, color or national origin, age, physical or mental disability, gender, sexual orientation, marital status, changes in marital status, pregnancy, parenthood, changes in military or veteran status, genetic information, citizenship/immigration status, or any other characteristic protected by law, when the reasonable demands of the position do not require distinction of the aforementioned items. This policy applies to all terms and conditions of employment including, but not limited to, hiring, promotion, termination, training, transfers, and compensation.

Disability Provision

Sultana intends to comply with the Americans with Disabilities Act (ADA) concerning the employment of individuals with disabilities. Accordingly, Sultana will not discriminate against qualified individuals who have disabilities with respect to selection and hiring, advancement, discharge, compensation, training, or other terms, conditions, and privileges of employment. Sultana will make an effort to reasonably accommodate qualified individuals with disabilities in order for them to perform the essential functions of a job.

Foraker's Commitment to Diversity, Equity, and Inclusion

Foraker is committed to diversity, equity, and inclusion in all that we do including all operations of Sultana. In an effort to articulate this commitment, we crafted our Diversity Intention Statement to guide how Foraker/Sultana approaches and performs our work. Each Sultana project can adopt their own commitment to diversity, equity, and inclusion but it cannot negate nor lessen

Foraker/Sultana's commitments. All will live by these commitments in their work with projects within Sultana.

Introductory Period

The first 90 days of employment are considered an introductory period for all new Sultana employees. During this time, the supervisor will monitor performance and the employee's ability to fit within the project's core purpose and values and Sultana's standards. During the introductory period, the employee's performance will be evaluated by their immediate supervisor. If, in the judgment of management, employee performance, conduct, or behavior is marginal or unsatisfactory, Sultana may terminate employment or may extend the orientation period for up to another 30 days to further evaluate performance and suitability for the job.

Sultana is an "at-will" employer and, therefore, has the right as does the employee to terminate employment for any reason or no reason at any time during or after the introductory period.

Employee Protection Policy (also known as Whistleblower Policy)

In all that it does, Sultana strives to meet the highest standards of ethical, moral, and legal business conduct. This is best achieved in an environment where all members of the organization are able to communicate with each other openly and honestly. Therefore, this Employee Protection Policy strongly encourages all staff to raise good faith concerns about any and all aspects of Sultana operations and to do so free from fear of reprisal, harassment, discrimination, or other victimization.

If any employee reasonably believes that a policy, practice, or activity of Sultana or an action of another employee violates the law or a policy of the organization (i.e., fraud, unlawful discrimination, etc.), the employee is encouraged to express that concern formally in writing to Foraker's President/CEO unless it is about that person and then the employee should report directly to the chair of the Sultana Board in person or by phone. If the employee wishes to remain anonymous, they can contact Foraker's President/CEO or the chair of the Sultana Board via postal mail at: 161 Klevin Street, Suite 101, Anchorage, Alaska 99508.

Sultana will not retaliate against an employee who discloses to a supervisor, member of Foraker or Sultana leadership, or a public body, as appropriate, any activity, policy, or practice of the organization, or action of another employee that the employee reasonably believes violates law or a policy of Sultana. In like manner, all Sultana employees and supervisors are aware of and have agreed to abide by these policies and as such shall not act in any manner to retaliate should a report be filed.

Section III: Employee Classifications

An employee's wages, benefits, and job duties are affected, in part, by classifications and Fair Labor Standards Act (FLSA) designation.

Full-time Employee

A full-time employee is one who is hired to work at least 40 hours per week and is eligible for benefits.

Part-time Employee

An employee who is hired to work less than 40 hours per week is considered a part-time employee. A part-time employee who is scheduled to work 20 hours per week or more is entitled to paid holidays and leave time on a prorated basis. A part-time employee working less than 20 hours per week does not accrue paid leave benefits. Employees must regularly work at least 24 hours per week in order to be eligible for insurance benefits.

Temporary Employee

An employee who is hired with the expectation that they will be employed for a definite period of time not to exceed six months and is not entitled to benefits is a temporary employee. A temporary employee who is retained beyond a continuous period of six months becomes a part-time or full-time employee.

Non-exempt Employee

An employee who is subject to the minimum wage and overtime provisions of the Fair Labor Standards Act is considered a non-exempt employee. Non-exempt employees are entitled to earn over-time pay for hours worked in excess of eight hours per day or 40 hours per week.

Exempt Employee

An employee who meets the criteria for exclusion from the wage and hour laws (e.g., administrative or professional) is considered an exempt employee. Exempt employees are salaried and do not receive pay for hours worked in excess of eight hours per day or 40 hours per week.

Section IV: Standards of Conduct and Expectations

Employee Conduct

Sultana's reputation for integrity and excellence requires careful monitoring and observation of both the spirit and letter of all applicable laws and regulations, as well as scrupulous regard for the highest standard of conduct and personal integrity.

Sultana intends to comply with all applicable laws and regulations and expects its employees to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct. In general, the use of good judgment based on high ethical principles must guide each employee to lines of acceptable conduct. If a situation arises that is difficult to determine the proper course of action, the first step should be to discuss it openly with an immediate supervisor or if you are the project lead staff member with the chair of the advisory board, or if necessary, Foraker's President/CEO.

Compliance with Sultana's expectations is the responsibility of every employee. If an employee's conduct has a detrimental impact on their performance, the performance of others, or reflects poorly on Sultana, it may result in corrective action, up to and including termination.

Employees have a responsibility to know, understand, and uphold all Sultana policies including the code of ethical behavior, conflict of interest policy, and travel policy.

Anti-harassment

Sultana will not tolerate any harassment of the organization's employees or advisory board members. In keeping with federal and state law and sound business practice, Sultana expressly prohibits any form of harassment, including that based on race, religion, color or national origin, age, physical or mental disability, gender, sexual orientation, marital status, changes in marital status, pregnancy, parenthood, changes in military or veteran status, genetic information or any other characteristic protected by law.

Workplace harassment

Workplace harassment can take many forms; it is not necessarily sexual in nature. It may be, but is not limited to, words, signs, offensive jokes, cartoons, pictures, posters, calendars, email jokes or statements, pranks, intimidation, physical assaults or contact, or violence. This listing by no means precludes the addition of other behaviors under the label "workplace harassment."

Failure of a supervisor or other employee to take action or provide an appropriate response when inappropriate behavior or activities not in accordance with these rules are witnessed can also be considered harassment.

Sexual harassment

Sexual harassment by supervisors, coworkers, customers, consultants, vendors, or volunteers is illegal and will not be tolerated. Unwelcome sexual advances, inquiries, request for sexual favors, derogatory verbal and visual displays, and verbal or physical conduct of a sexual nature constitutes sexual harassment. Additionally, sexual harassment is not limited to but can include when:

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

Reporting

- Sultana intends that employees have a working environment free from all forms of discrimination and conduct that can be considered harassing, coercive, or disruptive.
- Any behavior of an employee that is not welcomed, which is personally offensive, or which debilitates morale and thus interferes with work effectiveness may result in corrective action, up to and including termination. Sexual harassment is grounds for immediate termination.
- If an employee experiences any prohibited workplace harassment, including sexual harassment, or believes that they have been treated in an unlawful, discriminatory manner, the employee should report it immediately to their supervisor, the President/CEO, the Vice President/CFO, the Vice President of Programs, the Director of Sultana, or the Senior Director of Human Resources. Complaints should be submitted in writing. In the event the President/CEO is the alleged harasser, the complainant should make a report directly to the chair of the Sultana Board. Any report made to the project advisory board by the project lead should be reported to Foraker's President/CEO unless they are the alleged harasser and then the report should go directly to the chair of the Sultana Board.
- All reports will be promptly investigated with due and reasonable regard for the privacy of everyone involved. Sultana intends to respect the confidentiality of the claim to the extent possible. If after conducting an investigation, management believes that any employee has acted inappropriately, corrective action will be taken against the offending employee(s).

Retaliation

Retaliation of any kind will not be permitted against any employee making a good faith report of alleged harassment or cooperating in an investigation of alleged harassment.

Anti-bullying

Bullying is contrary to Sultana's organizational culture and core values. Sultana will not tolerate bullying behavior whether or not it is based on protected classes described equal opportunity, disability provisions and/or workplace harassment policies in this handbook. Engaging in bullying behavior may result in corrective action, up to and including termination.

Bullying is defined as repeated, health-harming mistreatment of one or more people by one or more perpetrators. It is abusive conduct that includes threatening, humiliating or intimidating behaviors, work sabotage that interferes with one's ability to perform their work, or verbal abuse.

The following types of behavior are examples of bullying:

- **Verbal bullying:** Slandering, 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 gestures that can convey threatening messages.
- **Exclusion:** Socially or physically excluding or disregarding a person in work-related activities.

In addition, the following examples may constitute or contribute to evidence of bullying in the workplace:

- Persistent singling out of one person
- Shouting or raising one's voice at an individual
- Using obscene or intimidating gestures
- Not allowing the person to speak or express themselves (i.e., ignoring or interrupting)
- Personal insults and use of offensive nicknames
- Public humiliation in any form

- Constant criticism on matters unrelated or minimally related to the person's job performance or description
- Public reprimands
- Repeatedly accusing someone of errors that cannot be documented
- Deliberately interfering with mail and other communications
- Spreading rumors and gossip regarding individuals
- Encouraging others to disregard a supervisor's instructions
- Manipulating the ability of someone to perform their work (e.g., overloading, under loading, withholding information, setting deadlines that cannot be met, giving deliberately ambiguous instructions)
- Assigning menial tasks not in keeping with the normal responsibilities of the job
- Taking credit for another person's ideas
- Deliberately excluding an individual or isolating them from work-related activities, such as meetings
- Unwanted physical contact, physical abuse or threats of abuse to an individual or an individual's property (defacing or marking up property)

Individuals who feel they have experienced bullying should report this to their supervisor (which can include the chair of the project advisory board) or to the President/CEO, the Vice President/CFO, or the Vice President of Programs, the Director of Sultana, or the Senior Human Resources Director before the conduct becomes severe or pervasive. All reports to the advisory board should also be shared with Foraker's President/CEO unless they are the subject of the complaint and then the chair of the Sultana board should be notified. All employees are strongly encouraged to report any bullying conduct they experience or witness as soon as possible to allow Sultana to investigate and take appropriate action.

Outside Activities and Conflicts of Interest

All employees are expected to avoid any conflict between their personal interests and the interests of Sultana. Employees engaging in any other activity, including outside employment, which might constitute a conflict of interest must notify Foraker's President/CEO.

Outside employment may be detrimental to Sultana because of the conflicting demand on employees' productivity or availability for work. Outside employment might also create a conflict or appearance of conflict between Sultana and the proposed employer.

Sultana employees are required to discuss the nature of the activity including outside employment first with their supervisor, then as needed with the project advisory board. If the conflict is deemed significant than the employee should notify the Director of Sultana before engaging in any activity that might pose a conflict. If the Director of Sultana determines that a conflict exists, the employee will be asked to resolve the situation, which normally will require termination of the outside activity that brought about the conflict.

Attendance and Punctuality

The scheduling requirements for each position will vary based on the duties and responsibilities of the position as well as the needs of the project focus within Sultana. Work schedules are established by the employee's immediate supervisor or by each project leadership. Employees are expected to work all of the hours and days assigned regardless of location.

Absenteeism and tardiness place a burden on other employees and make normal operations difficult. Sultana expects employees to be reliable and punctual in reporting to work. In rare circumstances when employees cannot avoid being late to work or are unable to work as scheduled, they should notify their immediate supervisor as soon as possible in advance of the anticipated tardiness or absence.

Poor attendance and excessive tardiness may result in corrective action, up to and including termination.

Personal Appearance

Sultana employees should maintain a professional, neat, and clean appearance, and one that appropriately meets the requirements of the position. Dress, grooming, and personal cleanliness contribute to the morale of all employees and affect the business image Sultana projects present to the public. Questions regarding acceptable personal appearance should be discussed with the employee's immediate supervisor.

Employees who come to work inappropriately dressed may be sent home with the request that they report to work in proper attire. Under such circumstances, employees will not be paid for the time away from work.

Electronic Communication Policy

Sultana projects will maintain an electronic communication system to assist in the conducting of business within the organization – access to the electronic systems is for conducting work on behalf

of the project. Projects can adopt their own rules but they cannot supersede nor lessen the intent of the following guidelines, which employees are expected to observe:

- The electronic systems are for conducting Sultana project business.
- The electronic systems may not be used to solicit or proselytize for commercial ventures, religious or political causes, outside organizations, or other non-job-related solicitations.
- The electronic systems are not to be used to create any offensive or disruptive messages. Among those which are considered offensive are any messages which contain sexual implications, racial slurs, gender-specific comments, or any other comment that offensively addresses someone's race, religion, color or national origin, age, physical or mental disability, gender, sexual orientation, marital status, changes in marital status, pregnancy, parenthood, changes in military or veteran status, genetic information, citizenship/immigration status, or any other characteristic protected by law.
- The electronic systems shall not be used to send (upload) or receive (download) copyrighted materials, trade secrets, proprietary financial information or similar materials without prior authorization.
- Sultana and Sultana project leaders reserve and intend to exercise the right to review, audit, intercept, access and disclose all messages created, received, or sent over these electronic systems for any purpose. Contents properly obtained for legitimate business purposes may be disclosed without the permission of the employee.
- The confidentiality of any message should not be assumed. Even when a message is erased, it is still possible to retrieve and read that message. Further, the use of passwords for security does not guarantee confidentiality.
- Employees are not authorized to retrieve or read any electronic messages that are not sent to them. Any exception to this policy must receive prior approval from their immediate supervisor.
- Employees shall not use a code, access a file, or retrieve any stored information, unless authorized to do so. Employees should not attempt to gain access to another employee's messages without the latter's permission.
- In the event that an employee will be absent from work for any extended length of time, the employee's immediate supervisor may request all computer pass codes.
- Any employee who discovers a violation of this policy shall notify their immediate supervisor who will in turn notify the Director of Sultana.

- All electronic communication is subject to the Document and Information Management Policy found in the Foraker/Sultana Administrative and Financial Policies Manual.

Confidentiality

Throughout the course of a Sultana project's daily operation, and because of the nature of services provided, confidential information may be obtained about other parties and/or organizations. All information that is considered confidential should not be disclosed to external parties or to employees without a "need to know." If there is a question as to whether certain information is considered confidential, the employee should first check with their immediate supervisor. This policy is intended to alert employees to the need for discretion at all times and is not intended to inhibit normal business communications.

Media Inquiries

Each Sultana project will have its own way of handling media inquiries that relate solely to their project. All press inquiries that relate directly to Sultana or Foraker should be referred to Foraker's Director of Communication and Education who will gather information from reporters and determine how to respond to requests. Foraker's President/CEO is the official spokesperson for Foraker and Sultana. The lead staff of each Sultana project is considered to be the official spokesperson for the project. Sultana project staff or advisory board members should not comment to the media either on or off the record about Sultana or Foraker unless advanced permission is given by Foraker's President/CEO.

Safety

Sultana is the employer of record but office space is generally not included with employment. Each Sultana project is responsible for ensuring a safe working environment for staff either on-site or in an off-site/remote working environment. In order to maintain the safest workplace possible, Sultana encourages prompt reporting of any unsafe condition to the Director of Sultana or the Senior Human Resources Director in order to address unnecessary risk.

Sultana and Foraker will share the Emergency Response and Business Continuity Plans as they exist and evolve so that each project has a framework for its own work environment. If a Sultana project does not have a specific emergency response and business continuity plan, then Sultana/Foraker's plan is the official plan.

No project plan can undermine the safety provisions outlined in the Foraker/Sultana plan. Each project plan must be shared with the Director of Sultana in advance of implementation. An employee should speak with their direct supervisor if further clarification is needed.

Section V: Compensation and Payroll Practices

Salary Administration

When an employee begins employment, they are informed of their rate of pay. That rate is based on a number of factors including assessment of the position, training, experience, the market for similar jobs, and available funds. Increases in salary are not guaranteed and will depend on a review of job performance, available funds, and marketplace conditions.

Paydays occur every other Wednesday. On that day, all employees are paid for the two-week period ending the prior Sunday. Sultana provides automatic deposit of wages via electronic funds transfer to each employee's designated bank account.

The following paycheck deductions are required by law: Federal Insurance Contributions Act tax (FICA), Medicare, federal income tax, and employment security taxes. Any other deductions require the employee's written authorization.

Overtime and Time Reporting

The regular workweek is 40 working hours. Some overtime may be required. Any overtime work must receive prior authorization by the employee's immediate supervisor. Failure to obtain prior authorization may result in corrective action up to and including termination. Overtime is paid to all non-exempt employees pursuant to applicable wage and hour laws. The overtime pay rate is one and one-half times the regular rate of pay for all hours worked over eight hours per day and/or 40 hours per week.

Accurate records of the hours worked ensure the employee is paid correctly and receives full credit for work hours completed. Non-exempt employees use timesheets to record hours worked. Exempt employees must submit timesheets documenting the usage of paid time off (PTO) during each pay period. Exempt employees are not eligible for overtime. Any additions, corrections, or changes to timesheets must be initialed by the employee's immediate supervisor. Employees are responsible for the accuracy and completeness of the information reflected on timesheets.

Timesheets are the property of Sultana. Alteration or removal of time sheets from the facility will invalidate them and require the employee to verify the time worked to the satisfaction of their immediate supervisor. An employee may not enter time for another employee, except in extraordinary circumstances (illness, out of town, etc.) and only if approved in advance by the employee's immediate supervisor.

Workweek and Schedule

For payroll and accounting purposes, the workweek begins at 12:00 a.m. Monday and ends at 11:59 p.m. the following Sunday. The normal workday for a full-time employee is eight hours. Sultana may

establish other schedules, workdays, or workweeks for individual employees or certain positions. (Please note that these hours and rules are in place for remote work/off-site work and are not based on a physical location.)

The scheduling requirements for each position will vary based on the duties and responsibilities of the position as well as the needs of the project. Work schedules are established by the project's executive or the employee's immediate supervisor. Employees are expected to work all the hours and days assigned. Requests for changes to the schedule or for particular days off must be made in advance and approved by the employee's immediate supervisor before the change.

If a non-exempt employee is not able to work their regular schedule during a workday, they are encouraged to make up the missing hours on the same day by beginning work early or working after regular hours of operation. If an employee is unable to make up the missing hours during the pay period, paid time off (PTO) may be used to make up the difference between hours required by the position and hours worked. The consistent use of PTO to cover missed work hours is not acceptable and may be subject to corrective action up to and including termination. Nonexempt employees who have completed a work day are not to use electronic communications or cellphones before or after work hours to conduct Sultana work unless in an emergency or with prior permission.

Payroll Advances

As a practice, payroll advances or loans will not be extended to employees. However, at the sole discretion of Foraker's President/CEO, an exception may be made to this policy in emergency or extraordinary circumstances.

In the rare event that a payroll advance is extended, repayment in full is expected, and repayment terms will be clearly established before the payroll advance. Repayment may be automatically deducted from the employee's paycheck. If the employee separates before repayment is made in full, the remaining balance will be deducted from the final paycheck. Any payroll advances may be limited to time worked but not yet paid.

Expense Reimbursement

While there is no expectation that employees will spend their personal funds, it may occasionally be necessary for an employee to incur reimbursable expenses while working on behalf of the project, as determined by the employee's immediate supervisor. Such expenses may include mileage for use of a personal vehicle, parking, meals, lodging, and transportation. If an employee has questions about what expenses are reasonable, they should ask their immediate supervisor before incurring the expense.

Mileage for use of a personal vehicle on Sultana business will be reimbursed at the prevailing mileage rate established by the Internal Revenue Service.

Employees agree to abide by the approved Sultana travel policy found in the Foraker/Sultana Administrative and Financial Policies Manual.

Sultana will reimburse an employee for actual expenses for travel, lodging, transportation, and food for approved work-related travel based on receipts.

If the travel is a billable expense the employee will follow the billing protocol within the same month of travel.

If an employee is uncertain about the nature of a reimbursable expense, then they should consult with their immediate supervisor or the project's executive. An example of a non-reimbursable expense would be movie rentals, alcohol, or personal souvenirs.

Major travel plans resulting in non-billable airfare and hotel costs must be approved in advance by an employee's immediate supervisor. All travel and resulting expenses paid directly by the employee will be reimbursed by Sultana when the employee has documented receipts and no later than one month after travel has occurred.

Personnel Records

It is Sultana policy to keep all personnel files confidential. As a general rule, the content of an employee's personnel file will be revealed to third parties only if the employee authorizes review of their file, or pursuant to request of a government agency with jurisdiction over Sultana, or pursuant to court order, or as otherwise required by law. Human Resources have direct access to all personnel files.

Medical records, I-9s, and personnel records will be kept separate according to statutory requirements and Foraker's Document Retention and Management Policy.

Emergency Office Closure Policy

Each project will determine its policy, procedures, and employee communication for extraordinary or emergency circumstances such as extreme weather, dangerous driving conditions, or power failures. Sultana reserves the right to close operations to ensure the safety of all employees. This determination will be made by Foraker's President/CEO or their designee.

Sultana expects that each project's plans will ensure that employees with supervisory or management duties will notify their direct reports of emergency closures once an official determination is made. In the event of a natural disaster or unforeseen emergency, employees are expected to inform their supervisor via phone, text, or email that they are safe as soon as possible. Each project lead should notify the Director of Sultana or Foraker's President/CEO. When the facilities are officially closed because of emergency conditions, the time off from scheduled work will be paid and will not require the use of PTO.

Employees are encouraged to make appropriate decisions regarding their safety during such circumstances. Employees with the ability to efficiently telecommute may do so. An employee should check with their supervisor in each instance where they believe working from home may be an option. If an employee elects not to work on a given day, they should notify their immediate supervisor as soon as possible in advance of the anticipated absence. In cases in which an emergency closing is not declared, employees must use PTO for the resulting absence. If schools are closed in the community in which the employee lives and/or works because of inclement weather, hazardous driving conditions, or natural disaster, they are encouraged to telecommute from home until conditions improve.

Section VI: Employee Benefits

Health Benefits – Medical, Dental, and Vision

Sultana provides medical, dental, and vision benefits to eligible employees. Employees who work at least 24 hours per week on a regular basis are considered eligible for insurance benefits.

Eligible employees can receive health insurance benefits on the first day of the month following 30 days of employment.

Eligible employees may be required to pay a portion of the premium for their individual enrollment in all medical, dental, and vision benefits. Employees are responsible for 100% of the premium for any dependent coverage (i.e., employee plus spouse/partner, employee plus children, and employee plus family). For an accurate detailed description and eligibility requirements regarding the benefits noted above, employees should refer to the specific benefit booklets provided during orientation or contact Human Resources.

Life Insurance and Accidental Death and Dismemberment Benefits

Full-time and part-time employees are eligible for life insurance and accidental death and dismemberment benefits offered by Sultana.

Long-Term Disability Benefits

Full-time employees are eligible for long-term disability benefits offered by Sultana.

Employee Assistance Program (EAP)

As part of Sultana's group insurance, employees have access to the Employee Assistance Program, which offers counseling and support in a variety of areas including, but not limited to legal questions, financial stress, child and elder care, depression, or anxiety. This program provides three sessions at no cost. It is confidential. Employee use of the resource and topic addressed will not be reported to Sultana.

Retirement Benefits

Full-time and part-time Sultana employees are eligible to participate in a tax deferred annuity (TDA) plan through payroll deduction upon their date of hire.

For an accurate description of the TDA plan, employees should refer to specific plan booklets provided at orientation by Human Resources.

Paid Time Off (PTO)

Sultana offers employees an accrued paid time off (PTO) plan that can be used for illness and vacations. This allows more flexibility because employees may use their annual leave for a wide range of reasons.

Eligible employees begin accruing PTO upon hire and may begin using their accrued PTO after completing three months of employment. Exceptions to this policy will be made at the discretion of Foraker’s President/CEO. Accrual rates are based upon length of service as follows:

| Years with Sultana | Annual Accrual |
|---------------------------|-----------------------|
| 0 – 1 years | 15 days per year |
| 2 – 3 years | 18 days per year |
| 4 – 5 years | 20 days per year |
| 6+ years | 25 days per year |

Employees are provided with an accounting of their leave balance with each paycheck. Employees may carry over up to 25 days (200 hours) of leave to the next fiscal year. Leave balances exceeding 200 hours on the final day of the fiscal year will be forfeited. If inability to take leave is the result of managerial denial of leave requests, Foraker’s President/CEO may review balances at the end of the fiscal year and allow additional hours to carry forward if the project budget allows. This exception can be made for one year only for any individual employee – the 200-hour cap will apply at the end of the subsequent fiscal year.

Employees will be paid for all accumulated leave, up to 200 hours, upon termination. The last hourly rate the employee received will be the pay rate used to pay the accumulated leave.

Scheduling PTO

All requests for PTO must be pre-approved by the employee’s immediate supervisor. If conflicts occur when scheduling leave, an employee's length of service with Sultana will be taken into account and as necessary may be used as the determining factor in resolving disputes. Employees should request leave at least two weeks in advance when possible to allow for adequate time to prepare for the employee’s absence. Approval of PTO will be done with consideration given to the individual's workload requirements.

Donated Leave Policy

A covered employee within the project may donate annual leave *directly* to another employee in the same project who has a personal or family medical emergency or other extraordinary circumstance that requires time away from work and has exhausted their available paid leave. An *extraordinary circumstance* for this policy can include becoming a new parent. It does not include extending a vacation. A *medical emergency* is a medical condition of either the employee or the employee's *family member* that is likely to require the employee to be absent from work for a prolonged period and to result in a substantial loss of income because of the employee's lack of available paid leave. An employee is encouraged to speak to their supervisor, who will then notify Foraker's President/CEO prior to requesting this option to ensure their circumstance warrants application.

- **Application to become a leave recipient:** An employee should apply in writing to become a leave recipient. Each application/letter should include:
 - The name and position title of the leave recipient.
 - The reason(s) donated leave is needed, including a brief description of the reason for the request, anticipated duration of the desired leave amount, and if it is a recurring one.
 - Certification regarding the medical emergency from a health care provider may be required.
- **Limitations on leave donations:** An employee may donate up to 80 hours of their PTO. To ensure that an employee is not exhausting their own PTO balance by donating leave, the employee must retain a total of at least 80 hours of leave.
- **Accrual of benefits and PTO using donated leave:** An employee does not accrue PTO during "time off without pay" status. Health benefits are maintained for the employee. However, the employee must still pay their current designated amount.
- **Restoration of unused donated annual leave:** Any donated and unused PTO remaining from the recipient after they return to work or upon termination or departure of the recipient will be restored to the PTO account of the donor(s).
- **Approval:** Foraker's President/CEO must pre-approve the recipient request for donated leave. Job requirements will be considered before the request is determined. Employee donations will be monitored to determine compliance with minimum PTO thresholds. Donations will not be granted if the threshold is not met.

Family Leave

Sultana is committed to creating an inclusive and equitable workplace that prioritizes relationships as an essential aspect of who we are. This commitment extends to our staff that come to the workplace with full lives that often include living parents and children. As the generations shift in the workplace, it is more common for staff members to be caregivers for their children and their parents. To honor the commitments of our staff, these policies are updated to include increased time for leave to care for one's parents. This policy does not include bereavement leave, which is covered under a separate policy.

Leave pertaining to children

Upon request, employees will be granted up to six weeks of leave in a single year upon the birth or adoption of a new family member. The first 10 business days of family leave are paid by the project. Once these 10 days have expired, the balance of family leave will be taken using PTO, and/or if PTO has been exhausted, the remaining family leave time will be taken without pay. An employee does not accrue PTO during "time off without pay" status. Health benefits are maintained for the employee and their dependents if already enrolled. However, the employee must still pay their current designated amount. Retirement benefits will be calculated on the actual wages paid during family leave.

Leave pertaining to parents

Upon request, employees will be granted up to three weeks of concurrent leave in a single year to care for a parent. The first 10 business days of family leave are paid by the project. Once these 10 days have expired, the balance of family leave will be taken using PTO, and/or if PTO has been exhausted, the remaining family leave time will be taken without pay. An employee does not accrue PTO during "time off without pay" status. Health benefits are maintained for the employee and their dependents if already enrolled. However, the employee must still pay their current designated amount. Retirement benefits will be calculated on the actual wages paid during family leave.

Options for extension of family leave can include use of the Donated Leave Policy (upon approval). Extraordinary circumstances that meet the established criteria in the Administrative Leave Policy could be considered at the discretion of Foraker's President/CEO or their designee and in conjunction with the project's leadership.

Procedures:

- The employee must request family leave from their supervisor.
- The supervisor informs the project's executive who will notify Foraker's President/CEO. All family leave requests must be reviewed by Foraker's President/CEO; family leave requests are approved at the discretion of Foraker's President/CEO.

- The employee will provide a plan to cover all work requirements during their absence. The employee shall work with their supervisor and the Project's executive on the final version of the plan.
- All additional leave requests in this category or in the administrative leave category must be granted by Foraker's President/CEO.
- The financial staff in charge of Sultana's payroll will track and account for the implementation of leave.

Administrative Leave

Upon the recommendation of the project's executive, Foraker's President/CEO may grant at their discretion paid administrative leave to an exempt employee when it is in the best interest of both the employee and the organization. One or more of the following reasons will apply:

- It is used to recognize an employee who consistently works significantly beyond a 40-hour work week.
- It is used to recognize completion of a project or program-related achievement that required significant additional hours to conclude.
- It is used in circumstances deemed appropriate by Foraker's President/CEO and the project's executive.

Bereavement/Emergency Leave

When circumstances arise in which the Family Leave Policy does not apply, Sultana will grant an employee reasonable bereavement or emergency time off without loss of pay when a family death or family emergency occurs that affects the employee's immediate family or other close relative or friend.

Employees will be allowed a maximum of five days leave with pay for situations involving their immediate family. The immediate family includes at minimum the employee's spouse or partner in a committed relationship, parents (including step-parents, foster parents, parents-in-law, and parents of their committed relationship), grandparents, siblings, children, children of a committed relationship, stepchildren, adopted child(ren), or any children for whom the employee has parenting responsibilities. This definition is presented with the expectation that other relationships are significant enough to warrant bereavement leave. A maximum of one day leave with pay will typically be granted for situations involving other close relatives or friends.

At the discretion of Foraker's President/CEO or their designee, leave with pay may be granted to an employee for other emergencies (e.g., serious illness or accident, house or wildfire, etc.).

Leave Without Pay

When paid leave is not warranted under other sections in this handbook, Foraker's President/CEO or their designee may grant leave without pay. An employee does not accrue PTO when on leave without pay status. Retirement benefits will be reduced to the actual wages paid when leave without pay is granted. Health benefits are maintained for the employee and their dependents if already enrolled. However, the employee must still pay their current designated amount.

Requests for time off without pay for periods longer than 10 consecutive working days are to be treated as a request for leave without pay. Leave may not exceed six months, except at the discretion of Foraker's President/CEO or their designee and in conjunction with project leadership. An employee on extended leave without pay may be required to report periodically on their leave status and intention to return to work.

During an approved leave without pay exceeding 30 calendar days, an employee's benefits will be suspended, with the exception of health insurance benefits, provided that the employee pays their portion of the premium during the period of the unpaid absence.

Time spent on leave without pay does not count towards an employee's longevity for purposes of benefit entitlement. For example, an employee who has been with the organization for 2.5 years and takes a six-month leave of absence is not entitled to the same PTO as an employee with three years of service. Service for benefit entitlement purposes will resume upon the employee's return to work.

Holidays

The following 12.5 paid holidays are observed by Sultana for full-time employees:

- New Year's Day
- Martin Luther King's Birthday
- Elizabeth Peratrovich Day
- Memorial Day
- Independence Day
- Labor Day
- Veterans Day
- Thanksgiving Day
- Day after Thanksgiving
- Christmas Eve
- Christmas Day
- Half-day New Year's Eve
- One floating holiday after one year of continued employment (expires each calendar year)

In the event that any of the above holidays falls on a Saturday, the holiday will be observed the preceding Friday. If the holiday occurs on a Sunday, observance will be on the following Monday.

In the event a recognized holiday occurs when an employee is using PTO, the day will be charged as holiday rather than PTO.

Upon request and approval by their immediate supervisor, employees may be granted time off for observance of religious or spiritual holidays in lieu of another approved holiday. Parents of school-aged children may also request observing the paid holiday/in-service days on a different day to align with school closures in which their dependent is enrolled. Employees who would like to swap a work day for a holiday may do so only with the permission of their supervisor in advance of the appointed day. The new day off must be taken within the same month.

Jury Duty and Witness Leave

Sultana supports employees in fulfilling their civic duties. Employees who are called for jury duty or who are subpoenaed to appear as a witness in a judicial proceeding will receive their regular salary during jury or witness service. Employees are expected to return to work in the event they are dismissed during normal working hours. Employees may be asked but are not expected to postpone jury service depending on specific workload issues.

The employee is expected to notify their supervisor upon receiving a jury summons or subpoena to appear as a witness in a judicial proceeding.

Military Leave

Sultana supports active duty reserve service for employees. If a service member is called to active duty, Sultana, in conjunction with the project leadership, will make a reasonable effort to keep the position available for the employee's return but will not guarantee that the same position will be available upon return.

A request for military leave must be accompanied by a copy of the employee's official orders. Absence(s) charged to military leave will not exceed 15 days a year. If additional time is requested for military training purposes, accrued PTO may be used. If an employee uses accrued leave, they will be paid the difference between the military compensation and their regular wages while on military leave.

Extended leave without pay may be granted at the discretion of Foraker's President/CEO in conjunction with project leadership.

Workers' Compensation

All Sultana employees are covered by workers' compensation insurance, which compensates an employee for lost time and medical expenses resulting from a work-related injury or illness. Employees must report any accident or injury immediately to their supervisor and Human Resources so necessary paperwork may be completed and submitted to the appropriate entities.

Workplace Wellness

Workplace wellness encompasses more than good physical health and nutrition. Wellness also includes safety, environmental, social, emotional, and intellectual aspects. Sultana strives to support a culture of workplace wellness and encourages each project to adopt practices that encourage employee behavior towards wellness decisions and actions. Sultana supports projects to share a list of programs and activities with project staff that promote wellness. This list can include:

- Encouraging safe behaviors
- Recycling and purchasing recycled products as appropriate
- Providing professional development and training as funding allows
- Encouraging all staff to take advantage of opportunities to volunteer in the community
- Holding staff retreats
- Offering workplace flexibility including remote work
- Offering periodic wellness activities
- Creating opportunities for children to be in the workplace with their parent as needed and appropriate (COVID protocol not withstanding)

All Sultana employees are encouraged to engage in the wellness practices and programs promoted and adopted by each project.

Section VII: Alcohol and Drug-Free Workplace

Note that workplace is any location where work is being conducted, such as office, home, etc.

Sultana is committed to a drug-free and alcohol-free workplace. The goal of this policy is to prevent the abuse of alcohol, drugs, or controlled substances on or near the workplace and during or close to working hours. As such, Sultana is committed to providing a safe work environment and to promoting and protecting the health, safety, and well-being of employees, consultants, and those we serve.

To meet this commitment, Sultana project employees are prohibited from engaging in the use, possession, sale, trafficking, distribution, or manufacture of illegal drugs, intoxicants, or controlled substances or abuse of prescription drugs or alcohol while in the workplace and/or working on behalf of the project. This also includes prescribed drugs not legally obtained, prescribed drugs not being used for prescribed purposes, and any prescribed drug(s) not taken according to a prescription.

Although the use of cannabis is legal in Alaska, it is still an illegal drug under federal law. For this reason, Sultana considers cannabis an illegal drug. The use of THC for medical purposes does not render it a legally prescribed drug, nor will such use be considered a legitimate explanation for on-the-job impairment.

Occasional exceptions to this policy against the consumption of alcoholic beverages may be made at the discretion of Foraker's President/CEO in conjunction with project leadership for small quantities of such beverages reasonable under the circumstances, usually wine or beer, which may be available at office parties or events sponsored by the project. At such parties and events, all project staff are expected to exercise good judgment and moderation. In no event may any underage individual consume alcohol. All persons are expected to comply fully with all laws (including laws prohibiting the operation of motor vehicles while under the influence), and to take safety precautions including arranging for a designated sober driver.

Any employee who is using prescription or over-the-counter drugs that may impair the employee's ability to safely perform the job, or affect the safety or well-being of others, must notify their supervisor of such use immediately before starting or resuming work while under the influence of such prescription or over-the-counter drug(s).

Employees are encouraged to voluntarily enroll in a rehabilitation program before drug or alcohol use affects their work or the safety or environment of others. An employee who desires assistance or leave time to address an alcohol, drug, or controlled substance abuse problem may seek help by contacting their immediate supervisor or the Senior Human Resources Director. An employee must agree to cease all involvement with alcohol, drugs, or controlled substances that may impact their job duties.

An employee requesting time off to seek treatment may use their available paid time off (PTO), or if the PTO balance is exhausted, they may request an unpaid leave of absence. While it is the employee's responsibility to seek help before the problem adversely affects their work performance or results in a violation of this policy, Sultana stands ready to provide emotional support on their journey. No one will be discriminated against for undertaking rehabilitation.

Violations of this policy are subject to corrective action up to and including termination of employment and possible referral for criminal prosecution.

Section VIII: Employee Feedback and Reviews

Performance Evaluations

The employee performance evaluation process is designed as a tool to provide feedback between the supervisor and the employee. Supervisors are expected to review the employee's performance for the previous review period and provide feedback to the employee. Measures should be developed for the upcoming review period against which to evaluate performance. The measures should support the project's mission, values, strategic and operating plans.

Sultana encourages all project supervisors to conduct formal annual performance evaluations with all employees. However, interim performance evaluations may be conducted at the discretion of an employee's immediate supervisor.

Supervisors may conduct a written performance review with newly hired employees upon the completion of their introductory period. Generally, the first 90 days of employment are considered an introductory period for all new employees.

Wage increases are not guaranteed and should not be expected as a result of an employee evaluation. Wage increases are based upon performance, market conditions, and available funds.

Section IX: Performance/Conduct Issues and Separations

Performance or Conduct Issues/Corrective Action

Whenever an employee's performance or conduct does not meet Sultana's or the project's standards, the employee will be notified of the inadequate performance or unacceptable conduct. Employees who fail to meet performance or conduct expectations or who fail to comply with Sultana policies may be subject to corrective action up to and including termination. Depending on the performance issue or infraction, corrective action may include verbal warnings, written warnings, or termination. Sultana intends to make the corrective action commensurate with the performance issue or infraction. Failure to correct or improve may result in termination. Serious infractions such as conviction of a crime, substance abuse on the job, sexual harassment, insubordination and dishonesty, or placing others in danger may result in immediate termination.

Separation

As previously stated in this handbook, Sultana is an at-will employer. This means that neither Sultana nor the employee has entered into a contract regarding the duration of employment. An employee is free to terminate their employment with Sultana at any time, with or without cause. Likewise, Sultana has the right to terminate employment with an employee at any time, with or without cause.

There are two forms of termination:

1. Resignation
2. Involuntary termination (i.e. discharge)

If an employee decides to resign from their position at Sultana, it is requested that they provide their immediate supervisor with at least two weeks advance notice. Doing so will give the project the opportunity to begin the search process and to transition the employee's responsibilities to another staff member until such time as the position is filled or other determination is made with respect to the position.

The decision to involuntarily terminate an employee will be made by the request of the project leader or advisory board to Foraker's President/CEO and carried out by Foraker's President/CEO or their designee.

The Senior Human Resources Director, or another designated representative, will be responsible for coordinating the termination documentation and making final pay arrangements. The employee will be entitled to all pay earned and benefits accrued through the last day of employment.

Sultana does not provide separation payments other than earnings generated from hours worked. Before separation, employees must account for all outstanding business expenses.

Final Pay

The Senior Human Resources Director, or another designated representative, will be responsible for disbursing the final paycheck to the employee. In all cases the final paycheck will be delivered to the employee pursuant to applicable law.

The project's executive, or another designated representative, will also collect any keys, credit cards, or other property of the project from the employee on the last day of physical presence in the office as an employee.

Section X: Raising Issues and Addressing Complaints

Complaint Resolution

Sultana intends to do what is fair and reasonable in day-to-day relations with its employees. Sultana also understands that throughout the course of business, concerns may arise about a variety of issues. Project employees are encouraged to address each concern as quickly as possible. Employees are urged to bring any problems or concerns to their immediate supervisor in order to provide the supervisor the opportunity to review and propose a resolution to the situation.

- **Step 1:** Employees should attempt to address concerns and resolve complaints informally, as soon as possible.

The following procedure has been established to address concerns or resolve complaints that cannot be resolved informally and immediately with the employee's supervisor. A complaint for the purpose of this process is an allegation by any employee that there has been a violation, misinterpretation, or misapplication of Sultana's policies, or that Sultana's policies have been unfairly administered in a way that adversely affects the employee.

In the event any employee begins to have difficulties with the project or a supervisor, the employee should proceed with the following steps.

- **Step 2:** The employee may report the problem in a written statement to their immediate supervisor within five working days of the occurrence or recognition by the employee that a problem or issue exists. The supervisor will acknowledge receipt of a complaint within 24 hours and respond to a complaint as quickly as possible, but no later than five working days from the date the concern was brought to their attention. The employee's immediate supervisor is responsible for notifying the Director of Sultana within 24 hours of receiving the complaint.

While Sultana encourages employees to discuss problems with the immediate supervisor, Sultana recognizes the problem could involve an immediate supervisor and make an employee reluctant to discuss it with the supervisor.

- **Step 3:** If an employee is reluctant to discuss the problem with an immediate supervisor, or if they are not satisfied with the supervisor's response from Step 1, the employee should discuss the concern with the Director of Sultana within five working days of the response. The Director of Sultana will give a response as quickly as possible, but not later than ten working days from the date the concern was brought to their attention. The Director of Sultana will consult directly with Foraker's President/CEO on all matters of this nature. The decision of Foraker's President/CEO is final.

Section XI: Related Documents

In addition to the employee handbook, employees are also responsible for following all Sultana's policies and procedures.

- Foraker/Sultana Administrative and Financial Policies Manual

Employees are encouraged to review these documents:

- Additional procedures guide for the project
- Additional administrative procedures guide from Sultana
- “Guiding Documents” for our work
 - Foraker Iceberg
 - Foraker Nonprofit Sustainability Model
 - Diversity and Equity Intention Statement (2020)
 - Culturally Aware Project Methodologies for Working with Tribes