

# Welcome to Policies and Procedures



## To NAVIGATE this manual (best viewed in Internet Explorer):

🕒 View the table of contents/bookmarks:

➤ **Firefox browser:**



➤ **Internet Explorer browser:**

Click green box →

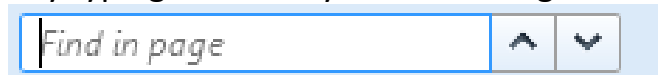
[green box may only be visible in certain browsers]

➤ **Chrome browser:**



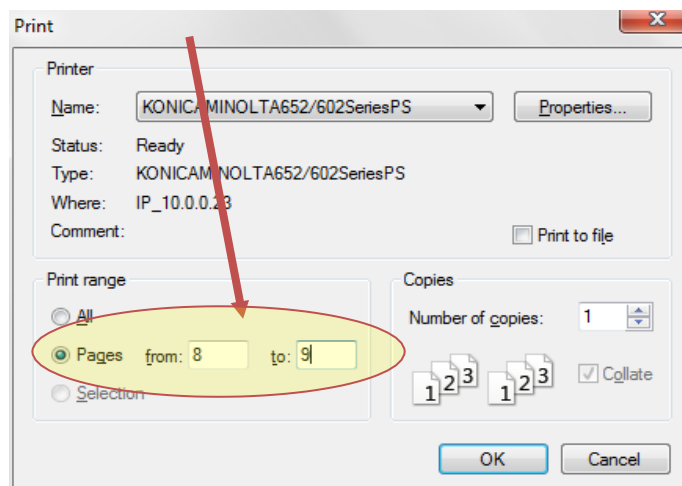
-OR-

🕒 Press 'Ctrl +F' and a search tool will show up on your screen where you can search the entire document by typing the word you are looking for in the box:



## TO PRINT:

In print properties, choose your page range. Otherwise you print the entire document, which would not be very eco friendly.



## ACCIDENT REPORT PROCEDURE

Issued by: Safety Manager

Eff. Date: 4/2018

Rev: A

Pg. 1 of 1

### 1. PURPOSE

To document the steps taken when an accident occurs.

### 2. PROCEDURE

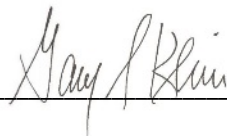
When an accident occurs, the first step for the injured employee is to notify their immediate or nearest supervisor. The reporting supervisor will start the process by obtaining a blank accident report form. The supervisor will do an initial investigation to make sure the area or equipment will not be a danger to anyone else and secure the area or equipment if necessary. The reporting supervisor will contact the Safety Manager at 315-601-5274 and then fill out the accident report form, completing only Section A of the form. Once Section A is completed, the supervisor will hit the **"Click here to email accident report"** tab, which will allow them to e-mail the accident report to [accidentreports@htcorp.net](mailto:accidentreports@htcorp.net). The Safety Manager will send out a Safety Alert from the above listed e-mail notifying all supervisors of an accident. The accident report will be directed to the appropriate Investigator who will complete Section B and Section C. If there is a facility hazard, the Investigator will generate a work order through a maintenance ticket in FMX labeled "Safety Emergency". If FMX is not appropriate for location, the investigator will make appropriate communication for correction to be made.

After the report is completed, it will be filed with the Benefit Specialist and reviewed by our Safety Committee.

### 3. REFERENCED DOCUMENTS

🔗 Accident Report: <http://htcorp.net/employee-pages/>, click "Report an Accident"

Approved by: \_\_\_\_\_



Date: 04/09/2018

## 1. PURPOSE

- a. The purpose of this policy is to provide guidance for breach notification when unauthorized access, acquisition, uses and/or disclosure of Human Technologies employee's protected health information occurs. Breach notification will be carried out in compliance with the American Recovery and Reinvestment Act (ARRA)/Health Information Technology for Economic and Clinical Health Act (HITECH) as well as any other federal or state notification law.

## 2. SCOPE

- a. This policy applies to all employees of Human Technologies and business associates (BA) of Human Technologies.

## 3. DEFINITIONS & ACRONYMS

- a. **AE** – All HT Employees
- b. **ITP** – IT Department Personnel
- c. **HR** – HT HR Personnel
- d. **BI** – Breach Investigator
- e. **BA** – Business Associate – Any partner business which has authorized access to PHI.
- f. **PHI** – Protected Health Information
- g. **HIPAA** - The Health Insurance Portability and Accountability Act (HIPAA) of 1996 (P.L.104-191)

## 4. PROCEDURE

- a. Breach Discovery
  - i. **AE** – Discovery of Breach: A breach of PHI shall be treated as “discovered” as of the first day on which such breach is known to Human Technologies, or, by exercising reasonable diligence would have been known Human Technologies (includes breaches by Human Technologies’ business associates). Human Technologies shall be deemed to have knowledge of a breach if such breach is known or by exercising reasonable diligence would have been known, to any person, other than the person committing the breach, who is a workforce member or agent (business associate) of Human Technologies. Following the discovery of a potential breach, Human Technologies shall begin an investigation, conduct a risk assessment, and based on the results of the risk assessment, begin the process to notify each individual whose PHI has been, or is reasonably believed to by Human Technologies have been, accessed, acquired, used, or disclosed as a result of the breach. Human Technologies shall also begin the process of determining what external notifications are required or should be made (e.g., Secretary of Department of Health & Human Services (HHS), media outlets, law enforcement officials, Board of Directors etc.)
  - ii. **HR** – Breach Investigation: Human Technologies shall name an individual to act as the investigator of the breach. The investigator shall be responsible for the management of

the breach investigation, completion of a risk assessment, and coordinating with others at Human Technologies as appropriate (e.g., administration, human resources, public relations, legal counsel, Board of Directors etc.) The investigator shall be the key facilitator for all breach notification processes to the appropriate entities (e.g., HHS, media, law enforcement officials, etc.). All documentation related to the breach investigation, including the risk assessment, shall be retained for a minimum of six years.

- iii. **HR, BI** – Risk Assessment: For an acquisition, access, use or disclosure of PHI to constitute a breach, it must constitute a violation of the HIPAA Privacy Rule. A use or disclosure of PHI that is incident to an otherwise permissible use or disclosure and occurs despite reasonable safeguards and proper minimum necessary procedures would not be a violation of the HIPAA Privacy Rule and would not qualify as a potential breach. To determine if an impermissible use or disclosure of PHI constitutes a breach and requires further notification to individuals, media, or the HHS secretary under breach notification requirements, Human Technologies will need to perform a risk assessment to determine if there is significant risk of harm to the individual as a result of the impermissible use or disclosure. Human Technologies shall document the risk assessment as part of the investigation in the incident report form noting the outcome of the risk assessment process. Human Technologies has the burden of proof for demonstrating that all notifications were made as required or that the use or disclosure did not constitute a breach. Based on the outcome of the risk assessment, Human Technologies will determine the need to move forward with breach notification. The risk assessment and the supporting documentation shall be fact specific and address:

1. Consideration of who impermissibly used or to whom the information was impermissibly disclosed.
2. The type and amount of PHI involved.
3. The potential for significant risk of financial, reputational, or other harm.

b. Notification

- i. **HR** – Timeliness of Notification: Upon determination that breach notification is required, the notice shall be made without unreasonable delay and in no case later than 60 calendar days after the discovery of the breach by Human Technologies or the business associate involved. It is the responsibility of Human Technologies to demonstrate that all notifications were made as required, including evidence demonstrating the necessity of delay.
- ii. **HR, BI** – Content of the Notice: The notice shall be written in plain language and must contain the following information:
- iii. A brief description of what happened, including the date of the breach and the date of the discovery of the breach, if known.
- iv. A description of the types of unsecured protected health information that were involved in the breach (such as whether full name, Social Security number, date of birth, home address, account number, diagnosis, disability code or other types of information were

involved).

- v. Any steps the individual should take to protect themselves from potential harm resulting from the breach.
- vi. A brief description of what Human Technologies is doing to investigate the breach, to mitigate harm to individuals, and to protect against further breaches.
- vii. Contact procedures for individuals to ask questions or learn additional information, which includes a toll-free telephone number, an e-mail address, Web site, or postal address.
- viii. **HR, BI – Methods of Notification:** The method of notification will depend on the individuals/ entities to be notified. The following methods must be utilized accordingly:
  1. Notice to Individual(s): Notice shall be provided promptly and in the following form:
  2. Written notification by first-class mail to the individual at the last known address of the individual or, if the individual agrees to electronic notice and such agreement has not been withdrawn, by electronic mail. The notification shall be provided in one or more mailings as information is available. If Human Technologies knows that the individual is deceased and has the address of the next of kin or personal representative of the individual, written notification by first-class mail to the next of kin or person representative shall be carried out.
  3. Substitute Notice: In the case where there is insufficient or out-of-date contact information (including a phone number, email address, etc.) that precludes direct written or electronic notification, a substitute form of notice reasonably calculated to reach the individual shall be provided. A substitute notice need not be provided in the case in which there is insufficient or out-of-date contact information that precludes written notification to the next of kin or personal representative.
  4. In a case in which there is insufficient or out-of-date contact information for fewer than 10 individuals, then the substitute notice may be provided by an alternative form of written notice, telephone, or other means.
  5. In the case in which there is insufficient or out-of-date contact information for 10 or more individuals, then the substitute notice shall be in the form of either a conspicuous posting for a period of 90 days on the home page of Human Technologies’s website, or a conspicuous notice in a major print or broadcast media in Human Technologies’s geographic areas where the individuals affected by the breach likely reside. The notice shall include a toll-free number that remains active or at least 90 days where an individual can learn whether his or her PHI may be included in the breach.
  6. If Human Technologies determines that notification requires urgency because of possible imminent misuse of unsecured PHI, notification may be provided by telephone or other means, as appropriate in addition to the methods noted above.

**BREACH NOTIFICATION POLICY**

Issued by: Director of Information Technology

Eff. Date: 11/7/11

Rev: C

Pg. 4 of 5

- ix. Notice to Media: Notice shall be provided to prominent media outlets serving the state and regional area when the breach of unsecured PHI affects more than 500 individuals. The Notice shall be provided in the form of a press release.
  - x. Notice to Secretary of HHS: Notice shall be provided to the Secretary of HHS as follows below. The Secretary shall make available to the public on the HHS Internet website a list identifying covered entities involved in all breaches in which the unsecured PHI of more than 500 individuals is accessed, acquired, used, or disclosed.
  - xi. For breaches involving 500 or more individuals, Human Technologies shall notify the Secretary of HHS as instructed at [www.hhs.gov](http://www.hhs.gov) at the same time notice is made to the individuals.
  - xii. For breaches involving less than 500 individuals, Human Technologies will maintain a log of the breaches and annually submit the log to the Secretary of HHS during the year involved (logged breaches occurring during the preceding calendar year to be submitted no later than 60 days after the end of the calendar year). Instructions for submitting the log are provided at [www.hhs.gov](http://www.hhs.gov).
  - xiii. Sample letter templates which can be used for the above notifications are available; see Sample Breach Notification Letter Forms.
  - xiv. **HR** – Maintenance of Breach Information/Log: As described above and in addition to the reports created for each incident, Human Technologies shall maintain a process to record or log all breaches of unsecured PHI regardless of the number of individuals affected. The log will be maintained on a secure folder located on a centrally located network folder (See HT Breach Notification Log). The following information should be collected / logged for each breach.
    - xv. A description of what happened, including the date of the breach, the date of the discovery of the breach, and the number of individuals affected, if known.
    - xvi. A description of the types of unsecured protected health information that were involved in the breach (such as full name, Social Security number, date of birth, home address, account number, etc.).
    - xvii. A description of the action taken with regard to notification of individuals regarding the breach.
  - xviii. Resolution steps taken to mitigate the breach and prevent future occurrences.
- c. Business Associate Responsibilities
- i. **BA, HR, BI** – The business associate (BA) of Human Technologies that accesses, maintains, retains, modifies, records, stores, destroys, or otherwise holds, uses, or discloses unsecured protected health information shall, without unreasonable delay and in no case later than 60 calendar days after discovery of a breach, notify Human Technologies of such breach. Such notice shall include the identification of each individual whose unsecured protected health information has been, or is reasonably believed by the BA to have been, accessed, acquired, or disclosed during such breach. The BA shall provide Human Technologies with any other



available information that Human Technologies is required to include in notification to the individual at the time of the notification or promptly thereafter as information becomes available. Upon notification by the BA of discovery of a breach, Human Technologies will be responsible for notifying affected individuals, unless otherwise agreed upon by the BA to notify the affected individuals (note: it is still the burden of Human Technologies to document this notification).

d. Workforce Training:

- i. **HR, ITP** – Human Technologies shall train all members of its workforce on the policies and procedures with respect to PHI as necessary and appropriate for the members to carry out their job responsibilities. Workforce members shall also be trained as to how to identify and report breaches within Human Technologies.

e. Complaints

- i. **AE** – Human Technologies must provide a process for individuals to make complaints concerning Human Technologies’ privacy policies and procedures or its compliance with such policies and procedures. Individuals have the right to complain about Human Technologies’ breach notification processes.
- ii. **AE – Retaliation/Waiver:** Human Technologies may not intimidate, threaten, coerce, discriminate against, or take other retaliatory action against any individual for the exercise by the individual of any privacy right. Human Technologies may not require individuals to waive their privacy rights under as a condition of the provision of treatment, payment, enrollment in a health plan, or eligibility for benefits.

f. Sanctions:

- i. **AE**-Human Technologies shall have in place and apply appropriate sanctions against members of its workforce who fail to comply with privacy policies and procedures.

**5. ASSOCIATED DOCUMENTS**

- a. Information Systems Policy Acknowledgement Form
- b. Breach Notification Log
- c. Sample Breach Notification Letter

**6. ASSOCIATED RECORDS**

- a. American Recovery and Reinvestment Act (ARRA)/Health Information Technology for Economic and Clinical Health Act (HITECH)
- b. Information Systems Policy
- c. Email Policy
- d. Internet Use Policy
- e. Social Networking Policy

## 1. PURPOSE

- a. The purpose of this procedure is to promote a work environment based on high expectations and standards of conduct to guide the actions of our board members, officers, employees, and contractors who provide services for or on behalf of Human Technologies, and to prevent, deter and detect fraud, waste and abuse.

## 2. SCOPE

- a. This procedure applies to all board members, officers, employees, business associates, vendors, contractors, students and volunteers and herein will be referred to as Agents of Human Technologies.

## 3. DEFINITIONS & ACRONYMS

- a. Abuse: refers to the intentional destruction, diversion, manipulation, misapplication, mistreatment or misuse of resources or improper use of a person's position of authority.
- b. Agents: refers to board members, officers, employees, business associates, vendors, contractors, students, and volunteers acting for or on behalf of Human Technologies.
- c. Code: refers to the Code of Conduct
- d. Company: Human Technologies
- e. Conflicts: refers to conflict of interest
- f. Fraud: an intentional misrepresentation or deception, usually in the form of a false statement, to obtain money or some other unauthorized personal benefit by deliberate deception to the detriment of another party, organization or entity. Fraud is an act that is committed knowingly, willfully, recklessly, or intentionally.
- g. HT: Human Technologies
- h. Protected Health Information- Individually identifiable health information, including demographic information collected from an individual.
- i. Waste: Incurring unnecessary costs as a result of thoughtless or careless management, practices, systems or controls; the over-utilization of services and the misuse of resources.

## 4. PROCEDURE

- a. APPLICABILITY
  - i. Code of Business Conduct covers a wide range of business practices and procedures. It does not cover every issue that may arise, but it sets out basic principles to guide the



Company.

- ii. All of the Company’s Board members, officers, employees, contractors, and volunteers must conduct themselves accordingly and seek to avoid even the appearance of improper behavior.

**b. PRINCIPLE 1: COMPLIANCE WITH LAWS, RULES AND REGULATIONS**

- i. Agents of HT are required to respect and obey the laws, rules, and regulations of the cities, states, and counties in which we may operate, both in letter and in spirit and,
- ii. If a law conflicts with any policy in the Code, you must comply with the law. Questions regarding any possible conflicts should be addressed to the VP of Human Resources.
- iii. Such laws include, without limitation, to those that apply to procurement integrity, securities, fraudulent conduct, workplace behavior, anti-trust, civil rights and anti-discrimination, copyright protection, campaign finance and taxation.
- iv. While the Company does not expect its employees to be experts in legal matters, it holds each employee responsible for being familiar with the laws governing his or her areas of responsibility and to be generally aware of possible legal issues and exposures or threatened litigation. Employees should seek immediate advice from the VP of Human Resources whenever they have a question concerning any application of the law.
- v. It is the policy of HT to not allow retaliation for reports made in good faith by Agents of misconduct by others. In addition, Agents are expected to cooperate in internal investigations of misconduct.
- vi. Violations of the Code will be subject to disciplinary action, including possible dismissal. In addition, violations of the Code may also be violations of the law and may result in civil or criminal action for you, your supervisor, or the Company.

**c. PRINCIPLE 2: LICENSING, PERMITS, CREDENTIALS, AND CERTIFICATIONS**

- i. The Company requires compliance with all necessary licenses, permits, certifications, and credentials required to perform operations. Each representative is responsible for ensuring these documents are obtainment in accordance with Company policy.

**d. PRINCIPLE 3: CONFLICT OF INTEREST**

- i. A conflict of interest exists when an individual’s private interest interferes in any way, or even appears to interfere, with the interests of the Company. Conflicts can arise and make it difficult for an individual to perform their duties objectively and effectively.
- ii. Agents (or a member of his or her family) are prohibited from receiving improper personal benefits because of his or her position in the Company.
- iii. It is a Conflict for Agents to work for or offer services to a competitor (or potential competitor), customer, or supplier and therefore will require you to fully disclose this to the Company’s Board of Directors (the “Board”), CEO and VP of Human Resources.
- iv. Agents should not recommend or place business with a firm owned or controlled by an

employee or his or her family without first obtaining written consent of the Board and CEO.

- v. Agents should not act as a consultant to a supplier, client or competitor of HT or employed by them or take money from them. An employee having any interest, direct or indirect (other than an interest of 5 percent or less in a publicly held Company) in any supplier, client, competitor or franchisee of the Company should make prompt disclosure to the Company and seek to obtain approval from the board of directors and CEO.
- vi. All conflict of interests are prohibited as a matter of Company policy, except as approved by the board of directors and CEO. Any individual who is aware of a conflict of interest must express this awareness in writing to their supervisor and the VP of Human Resources. Conflicts may not always be obvious, so questions must be directed to the VP of Human Resources.

e. **PRINCIPLE 4: ETHICAL PRACTICES**

- i. HT aspires to conduct its business in accordance with uncompromising ethical standards. Therefore, adherence to such standards should never be traded in favor of financial or other business objectives.
- ii. High ethical standards are necessary to maintain our focus on Mission, the pride and confidence of our employees, and the ability to provide quality services and products to our customers.
- iii. Agents of HT will conduct their practices ethically, fairly, in the best interests of the people we serve, and able to withstand the scrutiny of outsiders.
- iv. The diversity of HT's Agents is a tremendous asset. HT is firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment based on race, color, religion, sex, national origin or any other protected class.
- v. Agents will treat employees with personal dignity and respect no matter their role or responsibility.
- vi. Agents are prohibited from harassment of any form and withhold that all employees are entitled to work in an environment free of verbal, physical and sexual harassment.
- vii. HT may use marketing and advertising activities to educate customers and the public, increase awareness of our services and business offerings, and recruit new employees. HT is committed to representing its services and offerings fairly, honestly and accurately. Advertising, marketing and promotional materials cannot contain unfair, inaccurate or deceptive statements or grossly exaggerated or unwarranted representations.

f. **PRINCIPLE 5: RECORD-KEEPING, FINANCIAL CONTROLS, DOCUMENTATION AND DISCLOSURES**

- i. HT requires honest, accurate, and timely reporting of information in order to make responsible business decisions.

- ii. All HT books, records, accounts, and financial statements must be maintained in reasonable detail; must appropriately reflect the business transactions; must be promptly disclosed in accordance with any applicable laws or regulations; and must conform both to any applicable legal and any internal policy requirements.
- iii. All Agents will document any business expense accounts in a timely manner and in accordance with HT policy.
- iv. If an Agent is involved in proposals, bid preparation, or contract negotiations, he or she must be certain that all statements, communications, certifications and representations to prospective customers and payers are accurate and truthful.
- v. All Agents are prohibited from making false statement or submit a false claim in accordance with applicable regulatory or federal and state laws.
- vi. Agents are prohibited from seeking loopholes, taking shortcuts, or relying upon “technicalities” to avoid responsible conduct. Agents understand that “deliberate ignorance” is not acceptable and they are required to know applicable standards.
- vii. All reports submitted to government authorities must be made accurately, timely and in compliance with all applicable laws and regulations. All employees must cooperate fully with internal and external auditors during their examinations of company books, records and operations.
- viii. All Agents are required to submit charges and documentation of time to the appropriate government contracts and only charge their time to the project that they specifically worked on.
- ix. Agents are required to know that business records and communications often become public and should avoid exaggerations, derogatory remarks, guesswork or inappropriate characterizations of people or companies that may be misunderstood. This applies to client records, e-mails, internal memos, and formal reports.

**g. PRINCIPLE 6: CONFIDENTIALITY**

- i. Agents must maintain confidentiality of protected health or proprietary information entrusted to them by HT, its customers or suppliers, except when disclosure is authorized in writing or required by laws or regulations.
- ii. Agents are prohibited from mishandling confidential information and understand that by doing so can have serious consequences. No section of this Code of Conduct is intended to supersede HT’s HIPAA policies and together constitute our organizations response to confidentiality.
- iii. As a non-profit organization operating in the public interest, certain related information is available to members of the public upon request and with proper authorization to do so. Agents will conduct due diligence to ensure that confidential information is not inappropriately shared and in violation of applicable laws and regulations.
- iv. The President/CEO, with the advice of Corporate Counsel, will have the sole discretion to deem any information protected and order Agents to follow directives within the

confines of the law.

- v. Agents are required to label and handle confidential information as required by laws, regulations, and Company policies. Furthermore, Agents understand that the careless or inappropriate handling of that information may result violating confidentiality and will be subject to disciplinary action.
- vi. Agents agree to only share confidential information with other personnel who need to know the information to carry out their responsibilities. The sharing of confidential information with other personnel who does not have a need to know is a violation of confidentiality.
- vii. Agents are prohibited from sharing confidential information with any outside organization or person without proper authorization or when the law or regulations require you to do so.
- viii. Agents will safely store confidential information in accordance with laws, regulations, and Company policies.
- ix. Agents will not remove confidential information from the Company unless it is done so in accordance with Company policy and under the direct authorization of a supervisor and the VP of Human Resources. Individuals transporting confidential information are responsible for the safe transport of information and will never leave confidential information unattended.
- x. Third party information received while acting on behalf the Company is protected and only disclosed internally to individuals with a need to know. Third party information received prior to a representative's business relationship with the Company is prohibited and subject to re-disclosure laws.

**h. PRINCIPLE 7: COMPANY ASSETS/ PROPRIETARY INFORMATION**

- i. All Agents should protect HT assets and ensure their efficient use and profitability. Agents are prohibited from carelessness and agree to protect against Fraud, Waste and Abuse.
- ii. All company assets are to be used for legitimate company purpose and in accordance with HT policies for use of such property or proprietary information.
- iii. Proprietary information includes intellectual property such as trade secrets, patents, trademarks and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information, and any unpublished financial data and reports.
- iv. Agents are required to follow the HT's Visitor Confidentiality and Nondisclosure Policy to protect assets and proprietary information and are prohibited from sharing information outside the confines of Company policy and without written consent of the President/ CEO.
- v. Agents are prohibited from taking opportunities that are discovered through the use of corporate property, information or position for themselves without the written consent from the Board. No representative may use proprietary information to gain or compete with the HT directly or indirectly.

- vi. All current and former Agents are bound by these rules of confidentiality and Company policies. Agents that leave or end business with the HT, regardless of the circumstances of such leaving, may not use or share with anyone else confidential or proprietary information learned while employed here. Any breach of this rule may result in legal action.
- i. **PRINCIPLE 8: COMPETITION AND FAIR PRACTICE**
  - i. Outperformance of competition will be done so fairly, ethically and honestly. HT seeks competitive advantages through superior performance and never through unethical or illegal business practices.
  - ii. Agents are prohibited from stealing proprietary information, possessing trade secrets obtained without the owner's consent.
  - iii. Agents will respect the rights of and deal fairly with the HT's customers, suppliers, and competitors and will refrain from unfair advantages through Fraud, Waste, and Abuse or any illegal trade practice.
- j. **PRINCIPLE 9: ENVIRONMENTAL, HEALTH AND SAFETY**
  - i. HT expects its Agents to follow all applicable environmental laws and regulations.
  - ii. HT strives to provide each representative with a safe and healthy work environment and therefore requires all Agents to be responsible for maintaining such environment by following environmental, safety, and health rules and practices.
  - iii. Agents are required to follow HT's Accident and Incident policy for reporting injuries, violence, harassment, and any potential hazardous conditions.
  - iv. Agents are required to perform business in a safe manner, free from the influences of alcohol, illegal drugs, or controlled substances. The use of illegal drugs in the workplace or presenting impaired will not be tolerated.
- k. **PRINCIPLE 10: AUDITORS**
  - i. Agents are prohibited from directly or indirectly taking any course of action to coerce, manipulate, mislead, or fraudulently influence the Company's independent auditors for rendering a favorable but misleading outcome.
  - ii. Agents are required to present fair, accurate and comprehensive reporting to any auditor in order to perform the necessary review and will not withhold information that is directly asked of them.
- l. **PRINCIPLE 11: POLITICAL CONTRIBUTIONS, GIFTS AND FEDERAL**
  - i. Agents are prohibited from directly or indirectly taking any course of action (improper payment, gratuity or gift) to coerce, manipulate, mislead, or fraudulently influence the Company's independent OR Governmental auditors-affiliates for rendering a favorable but misleading outcome, securing services or influencing governmental decisions.
  - ii. Agents shall not accept gifts or gratuities as a direct result of their services or while carrying out their respective jobs for which they are being paid by HT.
- m. **PRINCIPLE 12: FRAUD, WASTE AND ABUSE.**

- i. HT has a zero-tolerance approach to Fraud, Waste and Abuse. The Company will identify and promptly investigate any suspected Fraud, Waste and Abuse against the Company or other parties with whom the Company has dealings. The Company will take all appropriate disciplinary and legal actions if Fraud, Waste or Abuse are discovered.

**5. ASSOCIATED DOCUMENTS**

- a. NONE

**6. ASSOCIATED RECORDS**

- a. Visitor Confidentiality and Nondisclosure Policy
- b. Whistleblower Policy



**ARTICLE I - Purpose**

The purpose of this Conflict of Interest and Confidentiality Policy (this "Policy") is to protect Human Technologies Corporation ("HTC") when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an HTC officer, Director (defined below) or Key Person (defined below). This Policy provides guidelines for handling any perceived, potential or actual Conflict of Interest (defined below) and addresses the procedures to be followed, and the disclosures to be made, in cases involving a Related Party Transaction (defined below). This Policy is intended to supplement, but not replace, any applicable state and federal laws governing conflicts of interest applicable to nonprofit and charitable organizations.

**ARTICLE II - Definitions**

**Section 2.1. Definitions.** As used in this Policy, the following underlined, capitalized words shall have the following meanings:

- (a) **Affiliate of HTC.** An Affiliate of HTC means any entity controlled by, in control of, or under common control with HTC. As of the date hereof, Human Technologies Properties Corporation is an affiliate of HTC.
- (b) **Board.** The Board is the board of directors of HTC as defined in the By-Laws.
- (c) **Conflict of Interest.** A Conflict of Interest exists if an outside interest or activity (including a Financial Interest) influences or appears to influence the ability of an individual to exercise objectivity or impair the individual's ability to perform his or her responsibility in the best interests of HTC.
- (d) **Director.** Director means a voting director of HTC
- (e) **Disinterested Director.** A Disinterested Director is any Director who is not an Interested Person.
- (f) **Financial Interest.** An individual has a Financial Interest if the individual has, directly or indirectly, through business, investment, or a Relative:
  - (I) An ownership or investment interest in any entity with which HTC has a transaction or arrangement;
  - (II) A compensation arrangement with HTC or with any entity or individual with which HTC has a transaction or arrangement; or
  - (III) A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which HTC is negotiating a transaction or arrangement.



As used in this Section 2.1(f), compensation includes direct and indirect remuneration as well as gifts or favors that are not insubstantial.

A director may still be independent even if employed by or has a financial interest in another entity, as long as the amount paid or received during each of the past three fiscal years:

1. is less than \$10,000 or 2% of the nonprofit's consolidated gross revenues, if the consolidated gross revenues are less than \$500,000,
2. is less than \$25,000 for nonprofits with consolidated gross revenues falling between \$500,000 and \$10,000,000; and
3. is less than \$100,000 for nonprofits with consolidated gross revenues of \$10,000,000 or more.

(g) **Interested Person**. An Interested Person is any Director, officer, or Key Person who (i) has a Conflict of Interest and/or (ii) is a Related Party.

(h) **Key Person**. A Key Person is any person, other than a Director or officer, whether or not an employee of HTC, who:

- (I) has responsibilities, or exercises powers or influence over HTC as a whole, similar to the responsibilities, powers, or influence of Directors and officers,
- (II) manages HTC, or a segment of HTC that represents a substantial portion of the activities, assets, income or expenses of HTC, or
- (III) alone or with others controls or determines a substantial portion of HTC's capital expenditures or operating budget.

(i) **Related Party**. A Related Party is:

- (I) any Director, officer or Key Person of HTC or any Affiliate of HTC;
- (II) any Relative of any Director, officer or Key Person of HTC or any Affiliate of HTC; or
- (III) any entity in which any individual described in clauses (I) and (II) of this Section 2.1(i) has a thirty-five percent (35%) or greater ownership or beneficial interest or, in the case of a partnership or professional corporation, a direct or indirect ownership interest in excess of five percent (5%).

(j) **Related Party Transaction**. A Related Party Transaction means any transaction, agreement or any other arrangement in which a Related Party has a Financial Interest and in which the HTC or any Affiliate of HTC is a participant. Certain transactions are

excluded as follows:

- (I) where the transaction itself or the related party's financial interest in the transaction is *de minimis*,
  - (II) where the transaction would not customarily be reviewed by the Board or boards of similar organizations in the ordinary course of business and is available to others on the same or similar terms, or
  - (III) where the transaction that constitute a benefit provided to a Related Party only as a member of a class of the beneficiaries that HTC intends to benefit as a part of its mission, as long as the benefit is available to similarly situated members of the same class on the same terms.
- (k) **Relative.** A Relative of an individual means:
- (I) his or her spouse or domestic partner as defined in Section 2994-a of the Public Health Law,
  - (II) his or her ancestors, brothers and sisters (whether whole or half blood), children (whether natural or adopted), grandchildren, great-grandchildren, and
  - (III) spouses or domestic partners of his or her brothers, sisters, children, grandchildren and great-grandchildren.
- (l) **Substantial Financial Interest.** A Financial Interest in a Related Party Transaction is a "Substantial Financial Interest" if, in the discretion of the Board or Audit and Finance Committee, after giving due consideration to the material facts and circumstances of the Financial Interest as presented, the Board or Audit and Finance Committee determines that such Financial Interest is substantial.

### **ARTICLE III - Disclosure**

**Section 3.1. Initial Disclosure.** Prior to the initial election of any Director, officer, or engagement of any Key Person, the prospective Director, officer or Key Person, shall complete, date, sign and submit to the Secretary of HTC a written Conflicts of Interest Disclosure Statement, on the form which is attached hereto as **Exhibit A**, identifying, to the best of his or her knowledge, at least the following information:

- (a) any entity of which such prospective Director, officer or Key Person is an officer, director, trustee, member, owner (either as a sole proprietor or a partner or otherwise), or employee and with which HTC has a relationship; and
- (b) any transaction in which HTC is a participant and in which the prospective Director,

officer or Key Person, might have a Financial Interest that may give rise to a Conflict of Interest or Related Party Transaction.

In addition, such prospective Director, officer or Key Person shall affirm in the Conflicts of Interest Disclosure Statement that he or she has received a copy of this Policy, has read and understands this Policy, agrees to comply with this Policy, and understands that HTC is a tax-exempt charitable organization and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

**Section 3.2 Annual Disclosure.** Each Director, officer and Key Person, shall annually submit to the Secretary of HTC a written Conflicts of Interest Disclosure Statement, on the form attached hereto as **Exhibit A**, in which such person:

- (a) identifies, to the best of his or her knowledge, at least the information specified in Sections 3.1(a) and 3.1(b) hereof; and
- (b) affirms that he or she has received a copy of this Policy, has read and understands this Policy, agrees to comply with this Policy, and understands that HTC is a tax-exempt charitable organization and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

**Section 3.3 Continuing Duty to Disclose.** In connection with any actual or possible Conflict of Interest or Related Party Transaction which may arise in the ordinary course of the year and within Board or committee meetings, an Interested Person must disclose the existence of the Conflict of Interest or Related Party Transaction and be given the opportunity to disclose all material facts to the Board or to the Audit and Finance Committee. Such disclosure may be made in a written statement or orally at a meeting of the Audit and Finance Committee, provided that such oral disclosure must be documented in the minutes of the meeting at which such disclosure is made.

**Section 3.4 Provision of Disclosure Statements to Audit and Finance Committee Chair.** The Secretary of HTC shall provide to the Chair of the Board and the Chair of the Audit and Finance Committee copies of all such Conflicts of Interest Disclosure Statements submitted to him or her.

## **ARTICLE IV - General Procedures**

### **Section 4.1. General Prohibitions.**

- (a) An Interested Person is precluded from being present at or participating in any Board or Audit and Finance Committee deliberation or vote related to the transaction or arrangement giving rise to a Conflict of Interest or Related Party Transaction. Notwithstanding the foregoing, the Board or Audit and Finance Committee may request that the Interested Person present information to the Board or Audit and Finance Committee prior to the commencement of deliberations or voting relating thereto.

- (b) An Interested Person shall not directly or indirectly attempt to influence improperly the deliberation or voting on the transaction or arrangement giving rise to the Conflict of Interest or Related Party Transaction.

**Section 4.2. Determining Whether a Conflict of Interest or Related Party Transaction Exists.**

- (a) After the Interested Person's disclosure of the existence of and all material facts relating to his or her Financial Interest as required under Article III hereof, and after any discussion among the remaining members of the Board or Audit and Finance Committee and the Interested Person regarding the facts and circumstances of the Financial Interest has concluded and the Interested Person has absented himself or herself from the proceedings, the Audit and Finance Committee shall discuss and make each of the determinations required by Sections 4.2(b) and 4.2(c) hereof.
- (b) Upon discussion, the remaining Board or Audit and Finance Committee members shall decide and document in the meeting minutes if the transaction or arrangement constitutes a Related Party Transaction as defined in Section 2(j) hereof. If so, then the Board or Audit and Finance Committee must also determine and document in the meeting minutes whether the Related Party has a Substantial Financial Interest, as defined in Section 2(l) hereof, in the proposed Related Party Transaction. Regardless of whether or not the Financial Interest is a Substantial Financial Interest, a Related Party Transaction is subject to the procedures set forth in Article V hereof.
- (c) If the transaction or arrangement does not constitute a Related Party Transaction as defined in Section 2(j) hereof, then the remaining Board or Audit and Finance Committee members in their discretion shall decide if a Conflict of Interest, as defined in Section 2(c) hereof, exists nonetheless, after giving due consideration to the material facts and circumstances presented. If the Board or Audit and Finance Committee determines that the transaction or arrangement involves a Conflict of Interest, then such transaction or arrangement is subject to the procedures set forth in Article V hereof.

**ARTICLE V - Procedures for Addressing Conflicts of Interest & Related Party Transactions.**

**Section 5.1. Consideration of Alternatives.**

- (a) If the transaction or arrangement is a Related Party Transaction in which the Related Party has a Substantial Financial Interest, then consideration of alternatives in accordance with this Article V is mandatory. For Conflicts of Interest which do not involve a Substantial Financial Interest, consideration of alternatives is within the discretion of the Audit and Finance Committee.
- (b) After disclosure and discussions with the Interested Person, the Board or Audit and Finance Committee may appoint a Disinterested Director or committee of Disinterested Directors to investigate alternatives to the proposed transaction or

arrangement. Alternatives must be presented to the Board or Audit and Finance Committee and must be documented in the minutes of the meeting at which the determination is made.

- (c) If alternatives are investigated and presented to the Board or Audit and Finance Committee, then after exercising due diligence and giving due consideration for any such alternative transactions presented, the Board or Audit and Finance Committee shall determine whether HTC can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a Conflict of Interest or Related Party Transaction.

**Section 5.2. Board or Audit and Finance Committee Decision.**

- (a) If alternatives are considered, whether mandatory or discretionary, and if the Board or Audit and Finance Committee determines that a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a Conflict of Interest or Related Party Transaction, the Board or Audit and Finance Committee shall determine by a majority vote of the Board or Audit and Finance Committee members present at the meeting (where there is a quorum present) whether the transaction or arrangement is fair and reasonable to HTC and in HTC's best interest at the time of such determination.
- (b) In conformity with the above determination, in accordance with HTC's Bylaws, the Board or Audit and Finance Committee shall make its decision as to whether to enter into the transaction or arrangement.
- (c) If the transaction or arrangement involves a Related Party Transaction in which the Related Party has a Substantial Financial Interest, then a majority of the Board or Audit and Finance Committee members present at the meeting (where there is a quorum present) is required in order to approve such transaction.

**Section 5.3. Documentation Required.** In connection with all actual or possible Conflicts of Interest and Related Party Transactions, the Board or Audit and Finance Committee shall document in the minutes of the meeting at which such determinations are made the following:

- (a) The names of the persons who disclosed or otherwise were found to have a Financial Interest in connection with an actual or possible Conflict of Interest or Related Party Transaction, the nature of the Financial Interest, any action taken to determine whether a Conflict of Interest or Related Party Transaction was present, and the Board or Audit and Finance Committee's decision as to whether a Conflict of Interest, Related Party Transaction or Substantial Financial Interest in a Related Party Transaction in fact existed.
- (b) The names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussions at the meeting regarding

the proposed transaction or arrangement, including the alternatives to the proposed transaction or arrangement considered, if any.

- (c) The determination as to whether the transaction or arrangement is fair and reasonable to HTC and in HTC's best interest at the time of such determination.
- (d) The determination as to whether to enter into the transaction or arrangement which gives rise to the Conflict of Interest or Related Party Transaction. If the Board or Audit and Finance Committee approves a Related Party Transaction in which the Related Party has a Substantial Financial Interest, then the minutes must also include the basis for such approval.
- (e) A record of any votes taken in connection with the proceedings.

## **ARTICLE VI - Oversight & Reviews**

**Section 6.1. Oversight Responsibility.** The Board or Audit and Finance Committee shall oversee the adoption of, implementation of, and compliance with this Policy in accordance with the procedures contained herein and within the process and authority granted to it by the Board under HTC's Bylaws and the Audit and Finance Committee Charter.

### **Section 6.2. Violation of the Conflict of Interest Policy.**

- (a) If the Board or Audit and Finance Committee has reasonable cause to believe a prospective Director, Director, officer or Key Person has failed to disclose an actual or possible Conflict of Interest or Related Party Transaction, it shall inform such person of the basis for such belief and afford such person an opportunity to explain the alleged failure to disclose.
- (b) If, after hearing the response of the prospective Director, Director, officer or Key Person and after making further investigation as warranted by the circumstances, the Audit and Finance Committee determines that the prospective Director, Director, officer or Key Person has failed to disclose an actual or possible Conflict of Interest or Related Party Transaction, it shall take or recommend appropriate disciplinary and corrective action, up to and including dismissal or termination.

**Section 6.3. Periodic Reviews.** To ensure that HTC operates in a manner consistent with its charitable purposes and does not engage in activities that could jeopardize its tax-exempt status, the Board or Audit and Finance Committee shall conduct periodic reviews. The periodic reviews shall, at a minimum, include the following subjects:

- (a) Whether compensation arrangements and benefits are reasonable, based on competent survey information, and the result of arm's length bargaining.
- (b) Whether partnerships, joint ventures, and arrangements with other organizations



conform to HTC's written policies, are properly recorded, reflect reasonable investment or payments for goods and services, further charitable purposes and do not result in impermissible or excessive benefit.

**Section 6.4. Use of Outside Experts.** When conducting the periodic reviews as provided for in Section 6.3 hereof, the Board or Audit and Finance Committee may, but need not, use outside advisors. If outside experts are used, their use shall not relieve the Board or Audit and Finance Committee of their responsibility for ensuring periodic reviews are conducted.

## **ARTICLE VII - Confidentiality**

**Section 7.1. Confidentiality.** Confidential and proprietary information is crucial to the operation of HTC. Such information includes, but is not limited to, grant or donor information, financial information belonging to HTC and/or to companies or individuals with whom HTC is doing business, proposals, criteria or decisions made with regard to the business of HTC. HTC, its directors, officers, employees and committee members have an ethical and legal obligation to protect confidential and proprietary information obtained in the course of their duties, and to preserve the restricted nature of this information except where it becomes publicly available, its release is authorized pursuant to court order or by operation of law, or is otherwise lawfully obtained.

- (a) Best efforts shall be made by the Board or Audit and Finance Committee ensuring that Conflict of Interest Disclosure Statements containing personal, financial and/or vocational information shall be kept confidential and access to such statements shall be limited to persons who have a reasonable need to know their contents.
- (b) Board members, officers, employees and committee members shall be prohibited from utilizing any confidential information acquired in connection with that person's work for HTC, for their personal benefit or to the detriment of HTC. If it is discovered that such confidential information has been disclosed for personal benefit and/or to the detriment of HTC by a Board member, officer, employee or committee member, appropriate disciplinary action may be taken. Such disciplinary action may include the removal of such Board member, officer, employee or committee member from his or her respective position(s), after giving such person notice and a fair opportunity to be heard and the ability to present any material or mitigating facts and other relevant evidence on the matter. Notwithstanding the foregoing, Board members, non-employee officers and committee members shall not be prohibited from utilizing confidential information for their personal benefit after such confidential information becomes publicly available provided, however, that such confidential information did not become publicly available because it was improperly disclosed by HTC or any of its Board members, committee members, officers, employees, agents or representatives (collectively, the "HTC Parties") or otherwise became publicly available through some misconduct or wrongdoing on the part of any of the HTC Parties.
- (c) Nothing in this Article shall be deemed to restrict or prohibit the release of information pursuant to a lawful court order or as required by local, state or federal laws.



**EXHIBIT A**

**Conflicts of Interest Disclosure Statement**

Capitalized terms used in this Conflicts of Interest Disclosure Statement (the “Disclosure Statement”), but not defined herein, shall have the meanings ascribed to them in HTC’s Conflict of Interest and Confidentiality Policy.

After completing, dating and signing this Disclosure Statement, please return it to

Human Technologies Corporation  
2260 Dwyer Avenue  
Utica, New York 13501  
Attn: Secretary

**Question 1.** Are you aware of any relationship or transaction with HTC (including, but not limited to, sales of property, goods or services, loans or lines of credit or other contractual arrangements of any type) that occurred during the past year, or is proposed for the upcoming year, which involves or could benefit:

(a) You; Yes  No

(b) any Relative of yours; or Yes  No

(c) any organization (including, but not limited to, for-profit entities, not-for-profit entities, trusts, etc.) in which you or a Relative of yours is a director, trustee, officer, committee member, member, partner, owner, employee or beneficiary? Yes  No

If yes, please list all such relationships or transactions below, including specific information concerning the essential financial terms thereof (e.g., a description of the property, goods or services in question, the duration of the arrangement, the consideration or price) and whether approval of the relationship or transaction has been obtained from the Board of Directors (or the Audit and Finance Committee). Attach additional sheets, if necessary.

Name(s)	Type of Relationship/Transaction	Approved by Board

**Question 2.** Are you aware of any relationship or transaction (other than those which you disclosed in response in Question 1 above) which involves HTC and in which you, a Relative of yours or any other Related Party has or might have a Conflict of Interest?

Yes  No

**CONFLICT OF INTEREST AND CONFIDENTIALITY  
POLICY of HUMAN TECHNOLOGIES CORPORATION**

Adopted on April 24, 2019

If yes, please provide the details below. Attach additional sheets, if necessary.

---

---

---

The answers to the foregoing questions are stated to the best of my knowledge and belief.

I also acknowledge that I have received a copy of, read and understood HTC's Conflict of Interest and Confidentiality Policy and Whistleblower Policy and agree that I have complied with and will continue to comply with such policies.

Additionally, I understand that in order to maintain its federal tax exemption HTC must engage primarily in activities that accomplish one or more of its tax exempt purposes.

***REMINDER: If at any time there is a matter under consideration in which you have or may have a Conflict of Interest, it is your obligation to disclose the facts regarding such matter to the Board or Audit and Finance Committee, to remove yourself from any deliberations relating to the matter, and otherwise to refrain from using your personal influence on the matter.***

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

## DISCIPLINARY ACTION POLICY

Issued by: VP of Human Resources

Eff. Date: 3/2013

Rev: C

Pg. 1 of 5

### 1. PURPOSE

- a. Human Technologies strives to hire the best qualified and conscientious people, but despite that, problems do arise from time to time with employee behavior and performance. When such problems do occur, Human Technologies will initiate disciplinary procedures in an attempt to change the behavior and encourage the employee to comply with the Corporation's rules, policies and procedures.

### 2. SCOPE

- a. All employees receive and sign an Employee Handbook and a Job Description upon hire. Their signature is their commitment to comply with all Human Technologies policies. Should an employee violate a Human Technologies policy or should performance issues arise the supervisor will access this Disciplinary Action policy to make the employee aware of their supervisor's concerns for their performance.

### 3. DEFINITIONS & ACRONYMS

- a. CEO – Chief Executive Officer
- b. HR Team – Includes VP of Human Resources or Human Resources Specialist
- c. HR Specialist – Human Resources Specialist
- d. IT – Information Technology
- e. VP- VP of Human Resources

### 4. PROCEDURE

- a. Premise
  - i. Disciplinary actions may include verbal counseling, verbal disciplinary action, written disciplinary action, suspension with or without pay and termination of employment. The supervisor will consult with a member of the HR Team prior to accessing the progressive discipline process to determine the appropriate action.
  - ii. Because certain acts are considered more serious, verbal counseling is not necessarily the first step in the process. The nature and extent of the misconduct will dictate the action taken, therefore, Human Technologies reserves the right to determine the appropriateness of disciplinary action.
  - iii. The following may be considered as reasons for disciplinary action (list is not all inclusive of every possible situation):
    1. Breach of confidentiality

## DISCIPLINARY ACTION POLICY

Issued by: VP of Human Resources

Eff. Date: 3/2013

Rev: C

Pg. 2 of 5

2. Chronic or habitual absenteeism or tardiness
  3. Insubordination
  4. Fighting (physical and/or verbal)
  5. Gross misconduct
  6. Sleeping on the job
  7. Violation of company policy or procedure
  8. Continued unsatisfactory job performance
  9. Failure to comply with safety rules
  10. Falsifying documents
  11. Endangering others
  12. Theft
  13. Conviction of a crime (if appropriate based on relevance of crime and job duties)
  14. Compliance Violations
- iv. When a supervisor identifies a performance issue with an employee, the supervisor is to contact a member of the HR Team to review the situation and discuss a plan of action.
- v. Appropriate written documentation will occur in all situations.
- vi. There must be a witness present during the delivery of all levels of disciplinary actions with the exception of verbal counseling. The witness should be part of the management chain of command. If management of the particular person is not available within a reasonable period of time, another manager can be present.
- vii. Should there be a need for an interpreter; Human Technologies will make the appropriate arrangements.
- b. Verbal Counseling
- i. Verbal counseling should be used when the supervisor has identified that an employee is on a path that is leading toward violating company policies or is exhibiting behavior that is not in line with expectations.
  - ii. Direct supervisor will meet with the employee to discuss the situation. The areas of concern will be discussed along with outlining expectations for changing the behavior or resolving the situation.
  - iii. Documentation will consist of a written summary of the issue, the date of the meeting, who is involved, expectations for changing the behavior, what will happen should behaviors continue and the timeline for change. Documentation should be maintained in the supervisor files.
  - iv. It is the responsibility of the employee to meet the expectations and the responsibility of

the supervisor to hold the employee accountable to the expectations.

c. Verbal Disciplinary Action

- i. A verbal disciplinary action may be the first step toward documentation in an employee's personnel file regarding an employee's behavior and/or violation with the employee's signature acknowledging the disciplinary action process has begun.
- ii. Direct supervisor will contact a member of the HR Team to discuss the appropriate disciplinary action and approve the disciplinary action document prior to the supervisor meeting with the employee. The direct supervisor will meet with the employee to discuss the situation. A witness will be present. The witness should be within the chain of command of the employee. If this is not possible, another supervisor of equal or higher level may be substituted.
- iii. The area of concern will be discussed along with expectations for changing the behavior or resolving the situation. Documentation will consist of a written HRF-62-07 Disciplinary Action Notice documenting what is happening/happened, the date of the meeting, who is involved, expectations for changing the behavior, what will happen should behaviors continue and the timeline for change.
- iv. Documentation will be maintained in the employee's personnel file.
- v. It is the responsibility of the employee to meet the expectations and the responsibility of the supervisor to hold the employee accountable to the expectations.

d. Written Disciplinary Action

- i. A written disciplinary action may be used as the second step in the disciplinary action process but can also be used as a first step in the process if the supervisor and HR Team deems a written disciplinary action appropriate for the behavior and/or violation that have occurred.
- ii. Direct supervisor will contact a member of the HR Team to discuss the appropriate disciplinary action and approve the disciplinary action document prior to the supervisor meeting with the employee. The direct supervisor will meet with the employee to discuss the situation. A witness will be present. The witness should be within the chain of command of the employee. If this is not possible, another supervisor of equal or higher level may be substituted.
- iii. The area of concern will be discussed along with expectations for changing the behavior or resolving the situation.
- iv. Documentation will consist of a written HRF-62-07 Disciplinary Action Notice documenting what is happening/happened, the date of the meeting, who is involved, expectations for changing the behavior, what will happen should behaviors continue and the timeline for change.

## DISCIPLINARY ACTION POLICY

Issued by: VP of Human Resources

Eff. Date: 3/2013

Rev: C

Pg. 4 of 5

- v. It is the responsibility of the employee to meet the expectations and the responsibility of the supervisor to hold the employee accountable to the expectations.
- e. Suspension with or without Pay
  - i. A suspension may occur if there is an allegation of abuse, violence or harassment while an investigation is being conducted. A suspension may also occur if the employee's behavior indicates a need for a suspension as the appropriate step in the disciplinary action process.
  - ii. No suspension will occur without the prior approval of the VP of Human Resources. Direct supervisor or HR Specialist will contact the VP of Human Resources to discuss the appropriate disciplinary action and approve the disciplinary action document prior to the supervisor meeting with the employee
  - iii. Direct supervisor and HR Team or designee will meet with the employee to discuss the situation. The area of concern will be discussed along with expectations for changing the behavior or resolving the situation.
  - iv. Documentation will consist of a written HRF-62-07 Disciplinary Action Notice documenting what is happening/happened, the date of the meeting, who is involved, expectations for changing the behavior, what will happen should behaviors continue and the timeline for change.
  - v. The employee will leave the premises immediately following the meeting and will not be allowed on the premise until the suspension is complete.
  - vi. There will be no contact with other employees other than their immediate supervisor or a member of the HR Team while out on suspension.
  - vii. Upon returning from suspension the supervisor and the employee will meet prior to the employee beginning work.
  - viii. The suspension issues will be discussed along with the expectations and timeline for change and the outcome should the behaviors occur again or should any other violation of company policy or procedure occur.
  - ix. It is the responsibility of the employee to meet the expectations and the responsibility of the supervisor to hold the employee accountable to the expectations.
- f. Termination:
  - i. Termination of employment may occur if the behavior of the employee indicates a need for termination as determined by the supervisor and a member of the HR Team.

## DISCIPLINARY ACTION POLICY

Issued by: VP of Human Resources

Eff. Date: 3/2013

Rev: C

Pg. 5 of 5

- ii. Reasons for termination may include but are not limited to the list above.
- iii. A member of the HR Team will work with the supervisor to gather all appropriate documentation. Documentation should include:
  - 1. All relevant documentation including any prior counseling and Disciplinary Action Notices;
  - 2. Any investigatory documents;
  - 3. Separation Record filled out; and
  - 4. Termination memo outlining reason for termination (if applicable).
- iv. Human Resources department will notify IT to disconnect employee access to the company's computer system & ID Badge and Payroll to process outstanding unpaid time (if applicable).
- v. Direct supervisor will meet with the employee to deliver the decision to terminate employment along with a member of the HR Team. A member of the HR Team will be present while employee is packing their things. The terminated employee should not be left alone at any time during the termination process.
- vi. The employee should leave the premises immediately.
- vii. All paperwork will be processed immediately. Payroll will process and mail all outstanding wages within the regular pay roll cycle. Any outstanding expense reports and mileage reports are to be approved by the supervisor and forwarded to the Finance Department immediately and the Finance Department will issue and mail a check for all outstanding approved expenses within 5 business days of the termination.

### 5. ASSOCIATED DOCUMENTS

- a. Disciplinary Action Notice
- b. Separation Record

### 6. ASSOCIATED RECORDS

- a. None



## 1. PURPOSE

- a. The purpose of this policy and procedure is to define that Human Technologies is a federal contractor within the meaning of the Drug-Free Workplace Act of 1988 (The "Act"). Consequently, Human Technologies is required to take certain steps toward maintaining and certifying to federal contractors and grantors that it strives to maintain a drug-free and alcohol-free workplace. Accordingly, Human Technologies adopts the following policy:

## 2. SCOPE

- a. This procedure applies to all Human Technologies Personnel

## 3. DEFINITIONS & ACRONYMS

- a. HT – Human Technologies
- b. Personnel – any person who is employed or retained by HT to provide services on behalf of the corporation paid or unpaid.

## 4. PROCEDURE

- a. Premise
  - i. HT prohibits employees from engaging in the unlawful manufacture, distribution, dispensation, possession or use of controlled substances in our workplace.
  - ii. The workplace includes not only the physical facilities of HT but all sites within the community where our staff works and/or provides a service. Further, employees are prohibited from being at work under the influence of alcohol, any controlled or synthetic substance.
  - iii. Any employee engaged in such prohibited conduct or convicted of a crime involving a workplace drug violation may be subject to disciplinary action up to and including termination. HT will weigh all relevant facts and circumstances in reaching a decision to discipline.
  - iv. In addition, an employee must report to their supervisor any criminal conviction for a workplace drug violation within five days of the conviction. The term "conviction" means a finding of guilty (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charges with responsibility to determine violations of State or Federal criminal drug statutes.
  - v. Within 10 days of being notified by an employee of a drug conviction, HT will notify the Contracting Officer of the conviction.

## DRUG FREE POLICY & PROCEDURE

Issued by: VP of Human Resources

Eff. Date: 9/1/2012

Rev: D

Pg. 2 of 2

- vi. Within 30 days after receiving notices of such convictions, the company will impose the following sanctions or remedial measures on the individual(s) involved: (A) Take appropriate disciplinary action up to and including termination; or (B) Require such individual to satisfactorily participate in a drug abuse assistance or rehabilitation program approved for such purposes.
  - vii. Nothing contained in this policy statement concerning employees shall be construed to limit, or in any way restrict, HT's treatment of drug-related incidents involving any of its employees.
  - viii. HT will establish an on-going drug-free awareness program to inform employees about the dangers of drug abuse in the workplace, to reinforce the company's commitment to maintenance of a drug-free workplace within the meaning of the Act and review the penalties that may be imposed on employees for drug and alcohol abuse violations. In addition, the drug-free awareness program will apprise employees of the availability of drug and drug rehabilitation counseling through community resources.
  - ix. Employees shall be provided with a copy of this policy statement and shall be required to acknowledge in writing, receipt of this policy and attendance at the drug-free awareness program specified in paragraph 4, above.
- b. Drug Testing
- i. Should an HT customer require anyone working on their contract to pass a drug screening as part of the contract, HT will conduct a drug test in accordance with the customer's requirements and federal, state and local law.

### 5. ASSOCIATED DOCUMENTS

- a. Employee Handbook

### 6. ASSOCIATED RECORDS

- a. Drug-Free Workplace Act of 1988

## 1. PURPOSE

- a. The purpose of this procedure is to establish policy with regard to the proper use, access and disclosure of electronic mail messages created, sent or received by employees using Human Technologies electronic mail system.

## 2. SCOPE

- a. This procedure applies to appropriate use of any email sent from a Human Technologies email address and applies to all employees, vendors, students, and agents operating on behalf of Human Technologies.

## 3. DEFINITIONS & ACRONYMS

- a. AE – All Employees
- b. HR – Human Resources Department
- c. HIPAA - The Health Insurance Portability and Accountability Act (HIPAA) of 1996
- d. HT- Human Technologies Management
- e. IT- Information Technology Department
- f. USER- Any person who has been authorized to read, enter, or update information created or sent through the electronic mailing system.
- g. E-MAIL- Electronic mail

## 4. PROCEDURE

- a. User Procedures
  - i. (AE) Electronic mail systems are intended to be used to assist in conducting HT business, to facilitate communications and to exchange information as needed.
  - ii. (AE) Users must use discretion when communicating electronically and understand that e-mail can be intercepted, forwarded, printed and stored by other users. E-mail users must ensure they maintain the same procedures and caution for protecting confidential information as required for communication of any other form.
  - iii. (AE) User will keep their mailbox clean, deleting messages as they become no longer necessary. Messages should be stored for no longer than 6-months and should be archived to your PC hard disk drive thereafter. Your mailbox cannot exceed 500 megabytes in size unless authorized by the IT Manager. The system will warn you when your mailbox reaches 475 megabytes and will discontinue your ability to send messages at 500 megabytes.

- iv. (AE) Users should understand that e-mail in your live mailbox is backed up on a regular basis for the purpose of business recovery. Mail in your local email archive is not backed up. All stored e-mail communication is subject to legal proceedings and can be subpoenaed.
- v. (AE) The HT email system has Virus protection as well as a SPAM filter, however it is the employee's responsibility to always exercise prudent judgment when opening email messages. Even messages from known, trusted persons should be suspect and reviewed before opening the message. All email hyperlinks and attachments should be suspect and not clicked on unless from a trusted source. If in doubt always contact the IT Department for their assessment of the message, attachment or hyperlink.
- vi. (AE) The confidentiality of any messages should not be assumed. Users understand that 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. All passwords created by a staff member must be disclosed to the company.
- vii. (AE) Users understand that e-mail should not necessarily replace a telephone call. Use each appropriately.

**b. Prohibited Use**

- i. (AE) Users are prohibited from using individuals protected health information for marketing purposes without their explicit permission.
- ii. (AE) Users are prohibited from disclosing protected health information via e-mail without appropriate authorization. E-mail disclosure is not best practice and should only occur with explicit written consent from the individual in question.
- iii. (AE) Users understand that the electronic mail system may not be used to solicit or proselytize for commercial ventures, religious or political causes, outside organizations, or other non-job-related solicitations.
- iv. (AE) Employees shall not use a password, 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. All computer passwords must be provided to the IT Director. No password may be used that is unknown to the company.

**c. Informed Consent**

- i. (AE) Users understand that the electronic mail system shall not be used to send Protected Health Information or any information which is in violation of the HIPAA Privacy Rule. If you suspect a violation please contact the HR department and refer to Breach Notification Policy.
- ii. (AE) Users will only transmit information inside or outside the company with proper authorization and on a need to know basis and in direct compliance of sections V (f) and VI (a) of this part.
- iii. (AE) Users will note in the subject line of all e-mail transmission that the information is confidential.

- iv. (AE) Users will ensure that when communicating by e-mail they complete the Release for Information and Release of Email Release forms.

d. Ownership

- i. (AE) The electronic mail system hardware is HT property. Additionally, all messages composed, sent, or received on the electronic mail system are and remain the property of HT. They are not the private property of any employee.
- ii. (AE) should have no expectation of privacy in anything they create, store, send or receive on the company's email system and that any of their messages may be viewed without prior notice. Such cases may include, but are not limited to:
  - iii. Location and retrieval of lost information
  - iv. Performance of duties when employee is out of the office
  - v. Control maintenance and system analysis
  - vi. System recoveries
  - vii. Investigations of potential violations in protected health information with probable cause.
  - viii. Electronic information is occasionally visible to IT staff engaged in routine testing, maintenance, and problem resolution.
- ix. (AE) Virus or other malware warning mass mailings from (HT) shall be approved by the IT Director before sending.
- x. (HT) reserves and intends to exercise the right to review, audit, intercept, access and disclose all messages created, received or sent over the electronic mail system for any purpose. The contents of electronic mail property obtained for legitimate business purposes may be disclosed within HT without the permission of the employee.
- xi. (AE) Notwithstanding HT's right to retrieve and read any electronic mail messages, such messages should be treated as confidential by other employees and accessed only by the intended recipient. Employees are not authorized to retrieve or read any email messages that are not sent to them unless authorized by the person for whom the email was intended.

e. Compliance

- i. (AE) Any employee who discovers a violation of this policy shall notify HT's, IT Director.
- ii. (AE) Any employee who violates this policy or uses the electronic mail system for improper purposes shall be subject to discipline, up to and including termination of employment.
- iii. (AE) Each email user must sign the "Information Systems Policy Acknowledgement Form" acknowledging their understanding of the Corporate Policies.

**5. ASSOCIATED DOCUMENTS**

- a. Information Systems Policy Acknowledgement Form

**6. ASSOCIATED RECORDS**

- a. The Health Insurance Portability and Accountability Act (HIPAA) of 1996
- b. Information Systems Policy
- c. Internet Use Policy
- d. Social Networking Policy
- e. Network Security Policy
- f. Breach Notification Policy

## 1. PURPOSE

- a. HT complies with the Family and Medical Leave Act (FMLA) of 1993 as amended. In doing so, an employee may be eligible for up to twelve (12) weeks of unpaid leave during any twelve (12) month period.

## 2. SCOPE

- a. To be eligible for FMLA, the employee must have been employed at HT for at least 12 months and have worked at least 1,250 hours during the immediate 12 month period preceding the commencement of the requested leave. Those employees whose worksite has less than 50 people within a 75 mile radius are not eligible for FMLA.
- b. The twelve-week period of leave may be taken within a twelve-month period which begins on the first day that leave is granted under this policy.
- c. The following are the circumstances that are covered under this policy/law:
  - i. To care for the employee's newborn child
  - ii. To accommodate the employee's adoption of a child or placement of a child with the employee for foster care.
  - iii. To care for employee's spouse, child or parent if such individual has a serious health condition.
  - iv. To accommodate the employee's serious health condition that prevents the employee from performing the duties of his/her job.
  - v. To care for a covered service member with a serious injury or illness.

In addition, FMLA also provides certain military family leave benefits. Eligible employees may take FMLA leave for specified reasons related to certain military deployments. Additionally, eligible employees may be eligible to take up to 26 weeks of FMLA leave in a single 12-month period to care for a covered service member with a serious injury or illness, when the employee is the spouse, son, daughter, parent, or next of kin of the service member.

- d. Method of Taking Leave:
  - i. An employee may take leave on an intermittent basis or reduced work schedule for cases involving serious illness/injury when medically necessary. However, when intermittent or reduced leave is taken, HT has the rig to temporarily transfer the employee to an available alternative position that has equivalent pay and benefits to the employee's current position that accommodates the recurring periods of leave.

## 3. DEFINITIONS & ACRONYMS

- a. HT – Human Technologies
- b. PTO – Paid Time Off
- c. HR Dept – Human Resources Department



#### 4. PROCEDURE

a. Notification and Reporting Requirements:

- i. When the need for leave is foreseeable, such as the birth or adoption of a child, or planned medical treatment, the employee must provide thirty days prior notice or if that is not possible make efforts to schedule leave so as not to disrupt the employer's operations.
- ii. In case of illness, the employee will be required to report periodically on his/her leave status and intention to return to work

b. Substitution of Paid Leave:

- i. When taking family leave for any reason HT may require that employees exhaust paid time off (PTO) before receiving the remainder of the leave as unpaid.
- ii. The HR Dept will forward a DB450 to employees that may be eligible for replacement income under New York State Disability.
- iii. The HR Dept will forward the appropriate Paid Family Leave form to employees that may be eligible.

c. Regulations and Conditions of Leave:

- i. HT may require Medical Certification to support a claim for leave for an employee's own serious health condition or to care for a seriously ill child, spouse or parent. This Certification must include the date on which the serious health condition began and the expected duration or schedule of any intermittent or reduced scheduled leave. For the employee's own medical leave, the certification must include a statement that the employee is unable to perform the functions of his/her position. Forms are available in the Human Resources Dept.
- ii. Spouses who are both employed by HT are entitled to a total of twelve weeks of leave (rather than twelve weeks each) for the birth or adoption of a child, the care of a sick parent or child or care of a current service member or certain veterans.
- iii. HT reserves the right to require medical certification justifying the need for medical leave under the provision of this policy. If the need is to care for a dependent child, spouse or parent of the employee, HT will require certification that the employee is needed to care for the person along with estimate of time that will be required to care for the individual.
- iv. HT reserves the right to require a second medical opinion, by a physician of the company's choice, to verify the information presented in the initial certification for the employees and their dependents. The cost for the second opinion will be a HT expense. If the second opinion differs from the initial certification, then HT and the employee will jointly select a third physician to provide a third opinion. The cost will be at HT expense.

d. Benefits Protection:

- i. Leave will not result in any loss of employment benefit granted prior to the date on which

the leave began. HT will maintain its portion of the employee's health insurance premium(s) during FMLA. Employees are required to continue paying their portion of their health insurance premiums while out on leave. Payments are due the first of each month. Failure to do so will result in termination of health insurance coverage.

e. Employment Protection:

- i. Upon return from FMLA leave, the employee will be restored to his/her original position or to an equivalent position with equivalent pay, benefits and other terms and conditions of employment.
- ii. HT reserves the right, as granted under the FMLA, to deny reinstatement to salaried employees who are among the highest paid 10% of the work force, if necessary to avoid "substantial and economic injury."
- iii. A Medical Certification of Ability to return to work will be required.
- iv. In the event an employee is unable to return to work within the twelve week period, there may be an automatic separation of employment.
- v. Any questions relating to FMLA leave will be addressed by our Human Resources Department.

**5. ASSOCIATED DOCUMENTS**

- a. Employee Handbook
- b. Family Medical Leave Request Form
- c. New York State Disability form – DB450
- d. Paid Family Leave Forms (PFL-1, PFL-2, PFL-3, PFL-4, PFL-5)

**6. ASSOCIATED RECORDS**

- a. Family and Medical Leave Act of 1993

**1. PURPOSE**

- a. To provide employee identification, so all employees can easily recognize employees from visitors, contractors etc.

**A. YOUR RESPONSIBILITY:**

- a. Your badge must be worn and visible at all times during your work shift, while in the building. Wear your badge between your shoulders and knees.
- b. Dwyer Ave and the Distribution Center have magnetic locks installed at the main entrance. Access to the building requires an employee badge with access rights to the facility. If you do not have access rights you must sign in at the reception desk.
- c. Building access hours for employees who work at Dwyer will be between 7:00 AM and 5:00 PM.
- d. Badges are the responsibility of the employee and if lost or stolen must be reported to your supervisor as soon as possible. Supervisors must report lost or stolen badges to IT as soon as possible.
- e. If you forget your badge you must request a temporary employee ID badge from the receptionist and return it at the end of your shift.
- f. Any employee visiting a building other than the one where they work will need to sign in for safety reasons.

## 1. PURPOSE

- a. The purpose of this procedure is to inform HT Information System users of the requirement to read all related Information Systems policies and sign the Information Systems Policy Acknowledge form.

## 2. SCOPE

- a. This procedure applies to new and existing HT employees.

## 3. DEFINITIONS & ACRONYMS

- a. **AE** – All Employees
- b. **IT** – Information Technology Department Personnel
- c. **HR** – HR Department
- d. **IV** – PROCEDURE

## 4. PROCEDURE

### a. Information Systems

- i. **HR** – This information will be issued through HR. The Information Systems Policy Acknowledgement Form once signed will be retained by HR in the employees' personnel file.
- ii. **AE** – All new employees will have read the E-mail Policy, Internet Use Policy, Social Networking Policy, Breach Notification Policy and Network Security Policy.
- iii. **IT** – The IT will not add anyone to the Corporate Information Systems users list unless they are advised by HR or the eligible employee's manager that their job requirements require this access.
- iv. **HR** – When an Information Systems user is either added, dropped or leaves HT, HR will advise IT through the use of the IT Help Desk of their addition/removal from the corporate network.

## 5. ASSOCIATED DOCUMENTS

- a. Information Systems Policy Acknowledgement Form

## 6. ASSOCIATED RECORDS

- a. Email Policy
- b. Internet Use Policy
- c. Social Networking Policy
- d. Network Security Policy
- e. Breach Notification Policy

## 1. PURPOSE

- a. Access to the Internet has been provided to staff members for the benefit of the organization and its customers. This policy covers appropriate use of the Internet at Human Technologies (HT).

## 2. SCOPE

- a. This procedure applies to all HT locations and applies to all employees, visitors, vendors, and agents operating on behalf of HT.

## 3. DEFINITIONS & ACRONYMS

- a. **AE** – All Employees
- b. **HT** – Human Technologies
- c. **IT** – IT Department Personnel
- d. **HIPAA** - The Health Insurance Portability and Accountability Act (HIPAA) of 1996 (P.L.104-191)

## 4. PROCEDURE

- a. HT Property & Equipment
  - i. **AE** - The equipment, services and technology used to access the Internet are the property of HT and the company reserves the right to monitor Internet traffic and monitor and access data that is composed, sent or received through its online connections of any type, including any future innovations which may be employed by HT.
  - ii. **AE** - Acceptable Use of the Internet
    1. Employees accessing the Internet are representing the company. All communications should be for professional reasons. Employees are responsible for seeing that the Internet is used in an effective, ethical and lawful manner.
    2. Internet Relay Chat channels and Instant Messaging services may be used only to conduct official company business, or to gain technical or analytical advice, not for personal use.
    3. Databases may be accessed for information as needed and authorized by HT and email may be used for business contact. Internet access to corporate email and other software from outside computers must be to transact company business only.
    4. Proper security measures must be taken to safeguard sensitive information and to safeguard your company username and password per the Network Security Policy.
- b. Unacceptable Use of the Internet
  - i. Access to sites that contain obscene, hateful, pornographic, unlawful, violent or otherwise illegal material.

- ii. Sending or posting discriminatory, harassing, or threatening messages or images on the Internet.
  - iii. Using computers to perpetrate any form of fraud, and/or software, film or music piracy.
  - iv. Disclosing or sharing information which is in violation of the HIPAA Privacy Rule.
  - v. Stealing, using, or disclosing someone else's password without authorization.
  - vi. Downloading, copying or pirating software and electronic files that are copyrighted or without authorization.
  - vii. Sharing confidential material, trade secrets, or proprietary information outside of the organization.
  - viii. Hacking into unauthorized websites.
  - ix. Sending or posting information that is defamatory to HT, its products/services, colleagues and/or customers.
  - x. Introducing malicious software onto the company network and/or jeopardizing the security of the organization's electronic communications systems.
  - xi. Sending or posting chain letters, solicitations, or advertisements not related to business purposes or activities.
  - xii. Passing off personal views as representing those of the organization.
  - xiii. The Internet should not be used for personal gain or advancement of individual views. Solicitation of non-company business, or any use of the Internet for personal gain is strictly prohibited.
  - xiv. Use of the Internet must not disrupt the operation of the company network. It must not interfere with your productivity or your co-workers productivity.
  - xv. Employees may not "surf" the Internet on Company time or engage in the use of personal streaming media (video's, internet radio etc.).
- c. Protection against Spyware and Viruses
- i. **IT** All computer systems will have spyware and virus protection software installed and functioning for protection from viruses, spyware and malware.
  - ii. **AE** It is the employee's responsibility to take reasonable precautions when using the internet and not expose the computer network to these threats unknowingly. Only well known, reputable websites should be visited and only to conduct company business. Even well-known and trusted websites can become compromised. If there is any doubt as to the validity or safety of a website the employee must contact the IT Department for their assessment before visiting the website.
- d. Communications
- i. Each employee is responsible for the content of all text, audio or images that they place or send over the Internet. Fraudulent, harassing or obscene messages are prohibited. All messages communicated on the Internet should have your name attached. No messages will be transmitted under an assumed name. Users may not attempt to obscure the origin of any message. Information published on the Internet should not violate or infringe upon the rights of others. No abusive, profane or offensive language is transmitted



through the system.

e. Software

- i. To prevent computer viruses from being transmitted through the system there will be no unauthorized downloading of any software. All software downloads will be coordinated through the IT Department. No personal software of any kind, including screen savers and custom windows cursors, shall be installed on Company computers without the permission of the IT Manager. No illegal / pirated software will be allowed on company computers under any circumstances.

f. Copyright Issues

- i. Copyrighted materials belonging to entities other than this company may not be transmitted by staff members on the Internet. One copy of copyrighted material may be downloaded for your own personal use in research. Users are not permitted to copy, transfer, rename, add or delete information or programs belonging to other users unless given express permission to do so by the owner. Failure to observe copyright or license agreements may result in disciplinary action from the company or legal action by the copyright owner.

g. Security

- i. All messages created, sent or retrieved over the Internet are the property of the company, and should be considered public information. The company reserves the right to access and monitor all messages and files on the computer system and is not private. All communications including text and images can be disclosed to law enforcement or other third parties without prior consent of the sender or the receiver.

h. Harassment

- i. Harassment of any kind is prohibited. No messages with derogatory or inflammatory remarks about an individual or group's race, religion, national origin, physical attributes, or sexual preference will be transmitted.

i. Violations

- i. Violations of any guidelines listed above may result in disciplinary action, up to and including termination. If necessary, the company will advise appropriate legal officials of any illegal violations.

**5. ASSOCIATED DOCUMENTS**

- a. Information Systems Policy Acknowledgement Form

**6. ASSOCIATED RECORDS**

- a. The Health Insurance Portability and Accountability Act (HIPAA) of 1996 (P.L.104-191)
- b. Information Systems Policy
- c. Email Policy
- d. Social Networking Policy
- e. Network Security Policy
- f. Breach Notification Policy

## 1. PURPOSE

- a. The purpose of this policy is to describe the requirements for attaching and securing a computer to the Human Technologies (HT) Network. Furthermore, to avoid expensive and disruptive security incidents by ensuring that all systems installed on the HT network are protected from the most common computer security threats.

## 2. SCOPE

- a. This policy applies to all employees of HT and anyone who attaches a computer or device to the HT Network.

## 3. DEFINITIONS & ACRONYMS

- a. **AE** – All Employees
- b. **HT** – Human Technologies
- c. **IT** – IT Department
- d. **HR** – HR Department

## 4. PROCEDURE

- a. Network
  - i. **IT** – Devices connected to the HT Network must have all relevant security patches applied, or the associated vulnerabilities must be otherwise effectively eliminated on a timely basis. When software vendors package fixes for Critical Vulnerabilities together with numerous other fixes to repair non-critical problems (such as Microsoft Service Packs), the risk of the combined fix introducing new problems is considerably higher. Consequently, systems administrators are not required to apply such "roll-up" software fixes in a timely manner, but rather are strongly encouraged to first consult with other technical staff at HT and elsewhere to determine whether sufficient testing has been done.
  - ii. **IT, AE** – Computers and Servers connected to the HT Network must have Anti-Virus software installed. The software must be up-to-date and have the auto-update feature turned on and functioning. This also applies to any system that remotely accesses the HT Network through the use of VPN or Citrix software.
- b. Passwords
  - i. Passwords are an important aspect of computer security. They are the front line of protection for user accounts. A poorly chosen password may result in the compromise of HT's entire corporate network. As such, all HT employees (including contractors and vendors with access to HT's systems) are responsible for taking the appropriate steps, as

outlined below, to select and secure their passwords.

- ii. **AE** – General password guidelines are as follows:
  - iii. All HT Network passwords must be at least 8 characters long and be composed of alpha-numeric characters. Furthermore, at least one character must be uppercase and one special character along with the lowercase and numbers.
  - iv. All passwords must be part of the IT Department administered password management database.
  - v. Passwords must not be inserted into email messages or other forms of electronic communication.
  - vi. Passwords are not allowed to be stored on paper or electronic format except for the HT approved solutions. The current approved solutions are Lastpass, One Password or KeePass. Please see IT to get any of the approved password storage software.
  - vii. Do not share HT passwords with anyone. All passwords are to be treated as sensitive, confidential HT information.
  - viii. Don't reveal a password over the phone to anyone
  - ix. Don't talk about a password in front of others
  - x. Don't hint at the format of a password (e.g., "my family name")
  - xi. Don't reveal a password on questionnaires or security forms
  - xii. Don't share a password with family members
  - xiii. Don't reveal a password to co-workers while on vacation
  - xiv. If an account or password is suspected to have been compromised, report the incident to the IT Department and request that all of your passwords are changed.
- c. System Lockout Policy:
- i. **AE**-System lockout is a procedure whereby a computer is locked and requires a password to access it upon your return. All HT Employees are required to lock their computer system when they leave their office. This can be accomplished in one of two ways:
  - ii. Press the Windows key + L
  - iii. Press Ctrl + Alt + Delete, and then click the "Lock Computer" button
  - iv. Secondly, your computer system will have a standard Windows screensaver turned on and set to "Upon return, require a password". The screen saver will be set to activate in a time period not to exceed 10 minutes of computer inactivity.
- d. Removable Storage Device Policy
- i. It is the policy of Human Technologies Corporation that mobile computing and storage devices containing or accessing the information resources on the HT network must be

approved by IT prior to connecting to the information systems at HT. This pertains to all devices connecting to the network regardless of ownership.

- ii. Mobile computing and storage devices include, but are not limited to: laptop computers, personal digital assistants (PDAs), plug-ins, Universal Serial Bus (USB) port devices, Compact Discs (CDs), Digital Versatile Discs (DVDs), flash drives, modems, handheld wireless devices, wireless networking cards, and any other existing or future mobile computing or storage device, either personally owned or HT owned, that may connect to or access the information systems at the HT.
- iii. Mobile computing and storage devices are easily lost or stolen, presenting a high risk for unauthorized access and introduction of malicious software to the HT network. Please report lost or stolen mobile computing and storage devices to the IT manager as soon as possible.
- iv. The use of Floppy Drives, USB flash drives and CD / DVD recorders (burners) is allowed. The employees who possess such devices are required to protect them from unauthorized access. These devices present the risk of introducing a virus or spyware to the HT network as well as removal of data and sensitive information. Sound security practices by all employees can substantially reduce this risk and still allow use of these devices. If training in security practices is needed please see the IT Department.

e. Computer Hardware Policy

- i. If your job requires it, a Desktop or Notebook (Laptop) computer system will be assigned to you by the IT Department. Once assigned the computer CPU, monitor and related peripherals are your responsibility. This responsibility includes the proper use and care as well as following all security procedures outlined in this document. The computer hardware and all related information contained on the computer must be protected from unauthorized access, theft and abuse. Any data contained on the system is the property of Human Technologies Corporation. Failure to adhere to any of these policies can result in disciplinary action up to and including termination.

**5. ASSOCIATED DOCUMENTS**

- a. Information Systems Policy Acknowledgement Form

**6. ASSOCIATED RECORDS**

- a. Information Systems Policy
- b. Email Policy
- c. Internet Use Policy
- d. Social Networking Policy

**1. PURPOSE**

- a. The purpose of this procedure is to ensure accuracy & consistency in how Human Technologies (HT) interacts with the media, all inquiries by the news media should be referred to the President/CEO. Employees may not respond to the media on behalf of HT without prior approval of the President/CEO. All information released to the media must have the approval of the President/CEO.

**2. SCOPE**

- a. This procedure applies to all employees.

**3. DEFINITIONS & ACRONYMS**

- a. HT – Human Technologies

**4. MEDIA INQUIRIES**

**a. Procedure Name**

- i. The Director/Manager will obtain from the media the purpose of the inquiry and any other relevant information, notify the CEO of the inquiry, and help determine the most appropriate person to respond to the inquiry.
- ii. The Director/Manager will then discuss the topic with any individual seeking approval to interact with the media and provide information and support as appropriate.
- iii. The CEO and Corporate Officers will analyze the impact of the media contact on the company, employees, customers and vendors. If warranted employees, customers, vendors, and board members will be notified by the CEO or corporate officer as appropriate.

**b. NEWS RELEASES**

- i. All news releases will come from the office of the President/CEO or at his discretion from an appointed individual.
- ii. All news releases must be approved by the President/CEO before its release to the media.
- iii. A copy of the news release will be sent to all officers and department managers the same day as its release to the media as appropriate. This information should be disseminated to all employees and staff as appropriate.

**5. ASSOCIATED DOCUMENTS**

- a. none

**6. ASSOCIATED RECORDS**

- a. none

## 1. PURPOSE

- a. Human Technologies (HT) is committed to its corporate mission and is also committed to acting in a fiscally responsible manner to ensure the future growth and success of the company. There are occasions when this responsibility causes HT to eliminate certain positions, ie: contract expirations, corporate restructuring, loss of supporting revenue, etc. This process is difficult for our employees and the company and therefore HT follows through with its responsibility in a fair and consistent manner.

## 2. SCOPE

- a. This procedure applies to all employees.

## 3. DEFINITIONS & ACRONYMS

- a. HT – Human Technologies
- b. RIF – Reduction in Workforce

## 4. PROCEDURE

### a. Criteria for Selection

- i. The following criteria are followed when determining which positions will be eliminated or laid off:
  1. Contract Demand - is the first criterion that determines which positions will be eliminated. A position will be eliminated when a contract expires, the direct/indirect labor workload demand decreases, or there is no work or less work for the contract that they are working on. Each employee is assigned to or hired for a specific contract. As a contract is due to expire or there is no work or a slow period, those employees working on that contract will be the employees impacted first.
  2. Disabled or Non-disabled - Does the employee have a documented disability and is HT compliant with its bona fide occupational qualifications ratios? Disability - As a Federal and State Contractor under the AbilityOne and NYSID programs, HT is required to maintain, at a minimum, a 75/25 disabled to non-disabled employee ratio for all direct labor positions by contract and an overall company direct labor ratio. Contract performance is monitored, for example, should our labor ratios fall below 75% then HT could possibly lose that contract opportunity and future State or Federal contract opportunities.
  3. Productivity - Individual productivity including meeting quality standards as determined by the contract specifications is critical to the success of the company

and therefore an important part of the criteria to deciding whose positions will be eliminated.

4. Skill set – Individual skill set and ability to transfer skills to other contracts, if needed on other contracts.
5. Attendance and attitude - Individual behavioral performance will also be considered when deciding whose position will be eliminated.
6. Tenure - It is HT's intention to honor tenure with the company when determining whose position will be eliminated. The employee that has been employed with HT the longest (consecutive time) will have priority over an employee with a shorter tenure with the company.

## 5. ASSOCIATED DOCUMENTS

- a. None

## 6. ASSOCIATED RECORDS

- a. None



## 1. PURPOSE

- a. The purpose of this policy is to provide guidelines to employees who are engaged in online social networking. Nothing in this policy is designed or intended to interfere with employees' [Section 7] rights.

## 2. SCOPE

- a. This procedure applies to all employees of Human Technologies Corporation.

## 3. DEFINITIONS & ACRONYMS

- a. **AE** – All HTC Employees
- b. **HIPAA** - The Health Insurance Portability and Accountability Act (HIPAA) of 1996 (P.L.104-191)

## 4. PROCEDURE

- a. Staff Responsibility
  - i. **AE** – Human Technologies Corporation respects the right of any employee to engage in online social networking using the Internet and other technology. This specifically includes websites such as Facebook, Instagram, YouTube, Twitter as well as various chat services and blogs and any previous or future similar social network. The policy covers instant messages, text, video, photos and audio. While we respect the employee's rights of self-expression, in order to protect the company's interests and ensure employees focus on their job duties, employees must adhere to the following rules.
  - ii. **AE** – Employees may not engage in such activities during work time or at any time with company equipment or property; unless the duties of their job require it.
  - iii. **AE** – All policies regarding confidentiality and personnel policies such as the policy prohibiting harassment and discrimination should be followed. Information regarding persons receiving services must not be disclosed. Other employee's privacy rights must be respected including the HIPAA Privacy Rule.
  - iv. **AE** – If the employee mentions HTC while engaging in social networking and also expresses a political opinion or an opinion regarding the company's actions, the person must specifically note that the opinion expressed is his/her personal opinion and not that of HTC. This is funding and regulatory bodies, referral sources, families and others.
  - v. **AE** – Any conduct that is illegal if expressed in any other forum is expressly prohibited.
  - vi. **AE** – Further, HTC encourages all employees to consider the manner and the speed by which information can be relayed using technology, and how such information can be misunderstood. We promote a culturally sensitive environment. We expect that any employee who is engaging in social networking is sensitive to cultural, ethnic, religious,

sexual orientation and other beliefs. While an employee's free time and personal equipment is generally not subject to any restrictions by HTC, the company urges all employees to not post information about HTC or their jobs which could lead to morale issues in the workplace or which could detrimentally affect the company's interests. We expressly reserve the right to discuss questionable material with the employee.

- vii. **AE** – Employees must use their best judgment. If you are about to post something that makes you uncomfortable, or that could be offensive to others, you should review the rules above.

## **5. ASSOCIATED DOCUMENTS**

- a. Information Systems Policy Acknowledgement Form

## **6. ASSOCIATED RECORDS**

- a. The Health Insurance Portability and Accountability Act (HIPAA) of 1996 (P.L.104-191)
- b. Information Systems Policy
- c. Email Policy
- d. Internet Use Policy
- e. Network Security Policy
- f. Breach Notification Policy
- g. Harassment and Violence Complaint Policy

**1. PURPOSE:**

- a. Human Technologies values its employees and recognizes that special times within their lives necessitate extra support by friends and co-workers. It is with this in mind that Human Technologies operates a Sunshine Fund for employees.

**2. SCOPE:**

- a. Human Technologies will send acknowledgement of the following situations with either flowers, fruit basket, dish garden or a donation:
  - ⌚ Birth/Adoption(s): Employee/Spouse
  - ⌚ Hospitalization: Employee
  - ⌚ Absence for 5 or more days due to outpatient surgery.
  - ⌚ Absence for 5 or more days due to an illness, accident or injury
  - ⌚ Death: Employee, or their immediate family member

**3. DEFINITIONS & ACRONYMS:**

- a. HR Department – Human Resources Department
- b. Immediate family member - spouse, domestic partner, child, parent, sibling, grandchild and grandparents

**4. RELATED DOCUMENTS & FORMS:**

- a. Related Forms: Sunshine Fund Acknowledgement Request form

**5. PROCEDURE:**

- a. Employee's manager or direct supervisor will notify the HR Department, providing the pertinent information supporting the event, such as obituary, birth announcement
- b. HR Department will confirm eligibility and process approved requests.

**6. ASSOCIATED DOCUMENTS**

- a. None

**7. ASSOCIATED RECORDS**

- b. None

**1. PURPOSE**

- a. The purpose of this procedure is to encourage better health and safety of our employees. Progressive research has continued to show that the use of tobacco products is the single most significant controllable threat to the maintenance of good health. The threat not only affects the voluntary user, but extends to non-users as well, as the aggressive effects of second-hand smoke are increasingly well documented.

**2. SCOPE**

- a. This procedure applies to any person at any time on any property owned, leased, operated or otherwise controlled by Human Technologies or its affiliates.

**3. DEFINITIONS & ACRONYMS**

- a. CEO – Chief Executive Officer
- b. VP – Vice President

**4. PROCEDURE**

- a. Premise
  - i. Accordingly, Human Technologies has elected to be a tobacco-free organization as a matter of policy, which includes these provisions:
  - ii. The use by any person at any time of any tobacco product, whether by smoking, chewing, vaping (e-cigarettes) or other manner, is prohibited in or on any property owned, leased, operated or otherwise controlled by Human Technologies or its affiliates, to include: Buildings, Offices, Grounds, Parking Lots, Driveways, Walkways, Vehicles owned or leased by Human Technologies or situated on any space owned, leased, operated or otherwise controlled by Human Technologies
  - iii. The use by any person of any tobacco product is prohibited at any activity sponsored or paid – in whole or in part – by Human Technologies or its affiliates within the area encompassing the activity, regardless of the location, ownership or lessee of the property or Human Technologies’ relationship to them, with the exception of private residences.
  - iv. The sale, exchange or transfer by any person at any time of any tobacco product, is prohibited in or on any property owned, leased, operated or otherwise controlled by Human Technologies or its affiliates.
- b. Communication
  - i. Signs are posted on all entrances to buildings advising that all tobacco use is prohibited.
  - ii. Applicants for employment are advised of this policy via a statement pre-printed on the Application for Employment form. The application can be found on Human Technologies’ website at [www.htcorp.net](http://www.htcorp.net)



## TOBACCO-FREE ENVIRONMENT POLICY

Issued by: VP of Human Resources

Eff. Date: 9/3/2012  
Rev 3/20/19

Rev: D

Pg. 2 of 2

### 5. ASSOCIATED DOCUMENTS

- a. Application for Employment Form

### 6. ASSOCIATED RECORDS

- a. None

## 1. PURPOSE

- a. The Company recognizes that Personnel of the Company may be required to travel or incur other expenses from time to time to conduct Company business and to further the mission of the company. The purpose of this Policy is to ensure that (a) adequate cost controls are in place (b) travel and other expenditures are appropriate, and (c) to provide a uniform and consistent approach for the timely reimbursement of authorized expenses incurred by Personnel. It is the policy of the Company to reimburse only reasonable and necessary expenses actually incurred by Personnel.

## 2. SCOPE

- a. This applies to all business related approved travel, entertainment and meetings.

## 3. DEFINITIONS & ACRONYMS

- a. Personnel: Board members, officers and employees of the Company (family members may also fall under this policy on certain select trips and outings).
- b. Official Worksite: The site where an employee reports to work and performs the majority of their duties.
- c. Mileage Reimbursement: Reimbursement at an authorized rate for approved business related travel in an employee's personal vehicle.
- d. Travel Reimbursement: Reimbursement for travel expenses for approved business related travel outside the employee's scheduled work day and business related entertainment expenses.

## 4. PROCEDURE

### a. Criteria for Reimbursement

#### i. Mileage Reimbursement

1. Travel between home and official worksite is considered commuting and not reimbursed.
2. Travel to and from an employee's official worksite and a different work assignment site will be reimbursed.
3. When an employee travels to a work assignment site and leaves from or returns to their home, reimbursable mileage should not include an employee's mileage between home and their official worksite. The miles related to an employee's normal commute should be subtracted from the mileage claimed for reimbursement. If a business-related trip is less than the employee's normal commute, no mileage should be claimed for reimbursement.

ii. Reimbursable Charges:

1. Calculation of distance traveled will be by actual odometer readings or through internet travel guides. Significant deviations need to be explained. Make sure to note miles deducted for normal commute.
2. Parking fees and toll expenses, including airport and hotel parking, connected with the authorized trip are reimbursable. Tolls paid by E-Z pass will be reimbursed.
3. Charges for gasoline, repairs, maintenance and other similar expenditures are not allowed as they are included in the mileage allowance.
4. The costs of parking tickets, fines and car washes for personal vehicles are the responsibility of the employee and will not be reimbursed.
5. The rate per mile will be at the currently approved IRS rate per mile.

iii. Travel Reimbursement:

1. **AIR TRAVEL:** Air travel reservations should be made as far in advance as possible in order to take advantage of reduced fares. Personnel traveling on behalf of the Company may accept and retain frequent flyer miles and compensation for denied boarding for their personal use. Human Technologies (HT) will not reimburse personnel for the use of frequent flyer miles as part of travel on behalf of HT

Use of Commercial Airlines:

- a. **Coach Class:** Coach class or any discounted class shall be used in the interest of economy. This policy applies to all travel (domestic or foreign, or any combination thereof) regardless of the purpose or fund source.
- b. **Business or First Class\*:** Use of business or first-class (first class is only acceptable on a 2 class airline) or other higher-cost services may be authorized under the circumstances listed below.
  1. Business class may be used if a single leg is more than 5 hours in flight duration or total travel time exceeds 8 hours.
  2. Business or first-class is the only service offered between two points.
  3. The use of coach class would be more expensive or time consuming, e.g., when, because of scheduling difficulties, traveling by air coach would require an unnecessary hotel expense, circuitous routing, or an unduly long layover when making connections.
  4. An itinerary involves overnight travel without an opportunity for normal rest before the commencement of working hours.



**TRAVEL POLICY**

Issued by: Chief Financial Officer

Eff. Date: 9/3/2012

Rev: B

Pg. 3 of 7

5. The use of business or first-class travel is necessary to reasonably accommodate a disability or medical need of a traveler.

Documentation of such circumstances should be provided in advance of scheduling travel. When a traveler prefers to use a higher class than the one authorized for reimbursement, the traveler must pay the incremental cost of the airfare. In cases other than those described above, a written authorization to use business or first-class or other higher-cost service shall be obtained in advance from an Officer. The traveler shall submit such authorization with a Purchase Requisition Form. Baggage fees imposed by the airline are also reimbursable expenses.

- 2 **LODGING:** Personnel traveling on behalf of the Company may be reimbursed at the single room rate for the reasonable cost of hotel accommodations. Convenience, the cost of staying in the city in which the hotel is located, and proximity to other venues on the individual’s itinerary shall be considered in determining reasonableness. Personnel shall make use of available corporate and discount rates for hotels.
- 3 **MEALS:** Personnel traveling on behalf of the Company are reimbursed for the reasonable and actual cost of meals. **Expenses for alcohol must be recorded on a separate receipt or able to be readily segregated on a detailed receipt.** Guidelines for per person costs (including tip) are:
  - o Breakfast: \$20
  - o Lunch: \$25
  - o Dinner: \$50

**Full itemized and detailed receipts** must be provided when meal charges exceed \$30. The name and affiliation of all people for whom expenses are claimed should be included.

- 4 **GROUND TRANSPORTATION:** Personnel are expected to use the most economical ground transportation appropriate under the circumstances and should generally use the following:
  - a. Courtesy Cars/Vans – Many hotels have courtesy cars which will take you to and from the airport at no charge. Employees should take advantage of this free service whenever possible and practical.
  - b. Airport Shuttle or Bus – Airport shuttles or buses generally travel to and from all major hotels for a small fee. Airport shuttle or bus services are generally located near the airport’s baggage claim area.

- c. Taxi Service – When courtesy cars and airport shuttles are not available or practical, a taxi is often the next most economical and convenient form of transportation.
- d. Rental Car – Employees will be allowed to rent a car while out of town, if the individual's supervisor has given advance approval and that the cost is less than alternative methods of transportation. Advance reservations should be made whenever possible and a compact to full sized model requested. Any vehicle above a full sized model will not be reimbursable unless there is a no cost upgrade. HT will reimburse for fuel expenditures unless the personnel fails to adhere to the return policy of the rental car company at which point the additional fuel surcharges are not reimbursable.
- e. When individuals use their personal car for travel to and from the airport, mileage will be allowed at the currently approved IRS rate per mile. In the case of individuals using their personal cars to take a trip that normally would be made by air, mileage will be allowed at the currently approved rate; however, the total mileage reimbursement will not exceed the sum of the lowest available round trip coach airfare.

- 5 GRATUITIES: Gratuities on meals are reimbursed at 20% maximum. Tips for porters, drivers, maids, etc. should be reasonable.

iv. Entertainment and Business Meetings

- 1. Reasonable expenses incurred for business meetings or other types of business-related entertainment will be reimbursed only if the expenditures are approved by the employee's supervisor. Any form of business meeting or business-related entertainment must be in conformance with the Code of Conduct policy. Detailed documentation for any such expense must be provided including:
  - a. Date and place of entertainment
  - b. Nature of expense
  - c. Names and business affiliation of those entertained
  - d. Description of the business purpose for the activity
  - e. Receipts must be provided

v. Method of Reimbursement

1. General:

- a. Expense Report must be submitted at least monthly and should include all expenses incurred during the month. An expense Report should be submitted within two weeks of the completion of travel if a travel advance has been received and/or if travel expense reimbursement is requested.

**TRAVEL POLICY**

Issued by: Chief Financial Officer

Eff. Date: 9/3/2012

Rev: B

Pg. 5 of 7

- b. The employee is responsible to ensure that the expense Report is completely and accurately filled out. Expense Reports will be returned to supervisors if not complete and accurate. This could cause a delay in reimbursement.
- c. Each employee and their supervisor are responsible to submit the completed monthly Expense Report to the Finance department within the first three business days of the month following the month in which the expenses were incurred.
- d. Expense Reports require approval before they are submitted. If an expense Report is not approved, the expense Report will be returned/rejected.
- e. The Finance department will issue reimbursement checks by the 15<sup>th</sup> day of the month in which an approved Expense Report has been received.

2. Requesting a Travel Advance

- a. An employee whose travel includes an overnight stay may request a travel cash advance of \$95 for each day away from their official worksite. A travel cash advance for travel not requiring an overnight stay must be approved by the Employee's Supervisor.
- b. The HT Travel Cash Advance Request is completed electronically using a Purchase Requisition Form. The Request must include: Reason for the Advance, Start Date of Travel, Employee's Department and Amount Requested.
- c. Request is submitted to the Employee's Supervisor and upon their Approval is forwarded to Accounts Payable for payment processing.

3. Preparing the Expense Report

The form may be amended from time to time but at a minimum will include the following:

- a. Heading: Employee's Name, Department charged for the Travel and Date Completed.
- b. Destination and Purpose of Travel. Be specific.
- c. Date and Description of Expenses
- d. Mileage - Travel From/To: The place where the travel started and where it ended. If the travel was round trip, it should be indicated as such.
- e. Total Miles traveled (note miles deducted for normal commute if applicable).
- f. Cost of Tolls or Parking. Receipts must be provided
- g. Activity for which Reimbursement is claimed. For example, Travel to and from Airport (100 miles) - \$55.50; Breakfast - \$7.00; Lunch - \$10.00; Thruway Tolls - \$2.50; Airport parking - \$30.00. Receipts must be provided.

- h. Any expenses listed under "Other" must include General Ledger Account Code to be charged.
- i. Total columns and calculate Total Amount of Expenses.
- j. Enter the amount of any Cash Advance received and subtract from Total Expenses.
- k. If Total Expenses exceed Cash Received, indicate the amount due the Employee. If Cash Received exceeds Total Expenses, indicate Amount due to HT and include reimbursement with Expense Report.
- l. Employee must certify, Supervisor must approve.

vi. Use of Corporate Credit Cards

- 1. Authorized employees\*\* are issued a Corporate Credit Card to use for business related travel and entertainment expenses.
- 2. All receipts or confirmations must be properly documented and submitted to the Sr. Accountant within one week for verification to the invoice.
- 3. Proper documentation includes: Purpose of expense, all individuals covered by the expense and their affiliations and General Ledger Account Code/Department to be charged.

vii. Submission of Expense Report for Employees with HT electronic submission.

- 1. The Expense Report should be completed as indicated above in the Excel format on the appropriate Expense Report form.
- 2. The Excel document should be attached to the Expense Report Request. Receipts should be recorded, scanned and also attached to the request.
- 3. The request is submitted by the Employee to his Supervisor for approval. Upon approval by the Supervisor the request goes to the Accounts Payable Specialist for payment processing.

viii. NON-REIMBURSABLE EXPENDITURES:

The Company maintains a policy that expenses in any category that could be perceived as lavish or excessive will not be reimbursable. The following expenses are deemed to be non-reimbursable:

- 1. First class tickets or upgrades\* HT will cover the expenses of air travel in Business Class for any single leg trip exceeding 5 hours or total travel exceeding 8 hours. First class is only acceptable on a 2 class airline and the rules of acceptable Business Class travel apply
- 2. When lodging accommodations have been arranged by the company and the individual elects to stay elsewhere, reimbursement is made at the amount no higher than the rate negotiated by the Company
- 3. When food costs are covered in the expense of a conference, meeting, training, etc. there will be no reimbursement for additional meal expenses even though HT has a \$95 per day.

4. Limousine travel
5. Movies, including in hotel room
6. Hotel mini bar or Hotel additional amenities
7. Membership dues at any country club, private club, athletic club, golf club, tennis club or similar recreational organization
8. Participation in or attendance at sporting events, without the advance written approval of the supervisor approving the travel
9. Purchase of any sporting equipment
10. Gambling losses, lottery, games of chance
11. Traffic or parking citations/fines
12. Credit card interest charges or late fees due to untimely submittal of expense related receipts
13. Spa, massage, exercise charges, salons, shoe shines, toiletry articles
14. Clothing purchases
15. Car washes for personal vehicles
16. Expenses for spouses, friends or relatives. If a spouse, friend or relative accompanies Personnel on a trip, it is the responsibility of the Personnel to determine any added cost for related expenses and to make the appropriate adjustment in the reimbursement request.
17. Political or charitable contributions on behalf of the individual employee or behalf of HT

Employees are expected to reimburse HT for any non-reimbursable expenditure at the time of the Expense Report submission.

\*\*Credit Card Authorization form is a separate authorization

## **5. ASSOCIATED DOCUMENTS**

- a. Expense Report

## **6. ASSOCIATED RECORDS**

- a. None

## TUITION REIMBURSEMENT POLICY

Issued by: Human Resources

Eff. Date: 1/2003

Rev: D

Pg. 1 of 2

### 1. PURPOSE:

- a. Human Technologies (HT) is committed to continuous learning and professional advancement that enhances the skill development of its employees. To encourage this, Human Technologies Corporation has established a Tuition Reimbursement Program for its full time employees following (1) one year of continuous employment.
- b. The focus of the Tuition Reimbursement Program is to help employees build relevant work skills within their current position. HT will not provide reimbursement for courses unrelated to one's current job or for general college degrees.
- c. HT will budget money annually for tuition reimbursement. Employees can request reimbursement if they are taking a course from an accredited institution. Courses must be job related or part of a degree program that is job related.
- d. A maximum amount of \$500 per semester will be reimbursed to employees taking an approved course. A maximum of \$1,500 will be reimbursed within a one year period. Applications will be submitted to an employee's immediate supervisor for approval. The supervisor, if not a Director, will forward to the Director in their chain of command followed by the VP of Human Resources for final approval.
- e. Employees must receive a final grade of B or better in order to receive reimbursement. Individuals who leave the Company prior to completing the course will not receive the tuition reimbursement.

### 2. PROCEDURE:

- a. Employee will complete and submit the ***Tuition Reimbursement Request Form*** prior to the semester starting, to their immediate supervisor for approval. The employee must provide a copy of the course description and the tuition cost. The supervisor, if not the Director, will forward the request to the Director in their chain of command followed by the VP of Human Resources for final approval.
- b. You will be notified by the VP of Human Resources within 72 hours if your application is approved or denied.
- c. Within two weeks of the end of the semester in which the class was taken, complete the ***Tuition Reimbursement Claim Form*** with your grade and tuition amount to the VP of Human Resources.
- d. Your reimbursement check will be sent out within three weeks of receipt of the above information.

### 3. ASSOCIATED DOCUMENTS

- a. Tuition Reimbursement Request Form
- b. Tuition Reimbursement Claim Form



## TUITION REIMBURSEMENT POLICY

Issued by: Human Resources

Eff. Date: 1/2003

Rev: D

Pg. 2 of 2

#### 4. ASSOCIATED RECORDS

c. None



## 1. PURPOSE

- a. The purpose of this policy is to support Human Technologies' commitment to preventing workplace violence and to maintaining a safe work environment. Given the increasing violence in society, HT has adopted a policy of "zero tolerance" with regard to violence in the workplace. Therefore, HT expects that all relationships among persons (Applicants/Employees/Interns/Students/Visitors) in the workplace or at any HT function will be professional, respectful and free of violent behavior.

## 2. SCOPE

- a. This policy applies to all applicants, employees, interns, students, and visitors (Visitors is defined as but not limited to: outside vendors, consultants, customers, friends, and family members).
- b. Conduct prohibited by this policy is unacceptable in the workplace and in any work related setting outside the workplace, such as but not limited to: during business trips, business meetings and business related social events.

## 3. DEFINITIONS & ACRONYMS

- a. CEO – Chief Executive Officer
- b. HT – Human Technologies
- c. Threats of violence - Any threat, behavior or action such as: verbal intimidation, gestures, abuses which is interpreted by a reasonable person to carry the potential to harm or endanger the safety of others, result in an act of aggression, destroy or damage property.
- d. Violence - Any act that is physically assaulting; such as hitting, pushing, kicking, and touching.
- e. VP of HR – Vice President of Human Resources
- f. Weapons - include any firearms, knives, explosives, and any other items with the potential to inflict harm or the perceived potential to inflict harm.

## 4. PROCEDURE

- a. There is no need to follow any formal chain of command when filing a complaint and you may bypass anyone in your direct chain of command. Please understand that the company takes complaints of violence very seriously!
- b. All employees are responsible for working in a manner that prevents violence in the workplace. Violence in the workplace is against our policy and will not be tolerated. Employees are required to report incidents of violence and can use the Complaint Form. The

**VIOLENCE IN THE WORKPLACE POLICY**

Issued by: VP of Human Resources

Eff. Date: 9/3/2012  
Rev 9-20-19

Rev: D

Pg. 2 of 4

Complaint Form can be found on the HT website: <http://htcorp.net/employee-pages/>.

- c. HT specifically prohibits the possession of weapons by any Applicant, Employee, Intern, Student, and Visitor while on company property, company sponsored event or performing services off the company property.
- d. HT will conduct a prompt and thorough investigation that ensures due process for all parties, whenever management receives a complaint about violence, or otherwise knows of possible violence occurring. HT will keep the investigation confidential to the extent possible. Effective corrective action will be taken whenever a form of violence is found to have occurred. All employees, including managers and supervisors, are required to cooperate with any internal investigation.
- e. All employees are encouraged to report any acts of violence, suspicious person or erratic behaviors that violate this policy regardless of the offender's identity or position. HT will provide all employees a complaint form for employees to report violence. An employee can also call the VP of HR by calling (315) 570-6910 or (315) 527-5120. To file a complaint with a Department Director/Manager, a Corporate Officer or the President/CEO, you can call (315) 724-9891.
- f. Managers and supervisors are **required** to immediately report any complaint that they receive, or any forms of violence they observe or become aware of, to the VP of HR, immediately.
- g. Retaliation is prohibited: Retaliation can be any action that could discourage a person from coming forward to report an act of violence. Adverse action need not be job-related or occur in the workplace to constitute retaliation (e.g., threats of physical violence outside of work hours).
- h. Even if the alleged behavior does not turn out to rise to the level of a violation of the policy, the individual is protected from retaliation if the person had a good faith belief that the behavior was a violation. However, the retaliation provision is not intended to protect persons making intentionally false charges of violence in the workplace.
- i. Early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of violence. HR requires the prompt reporting of complaints or concerns so that rapid and constructive action can be taken.
- j. Violation of this policy is subject to disciplinary action up to and including termination of employment.

**Complaint and Investigation of Harassment / sexual harassment**

**All** complaints or information about violence in the workplace will be investigated, whether that information was reported in verbal or written form. Investigations will be conducted in a timely manner, and will be confidential to the extent possible.

An investigation of any complaint, information or knowledge of suspected violence will be prompt and thorough, commenced immediately and completed as soon as possible. All persons involved, including complainants, witnesses and the alleged will be accorded due process, as outlined below, to protect their rights to a fair and impartial investigation.

Any employee may be required to cooperate as needed in an investigation of suspected violence. HT will not tolerate retaliation against employees who file complaints, support another's complaint or participate in an investigation regarding a violation of this policy.

While the process may vary from case to case, investigations should be done in accordance with the following steps:

- Upon receipt of complaint, the VP of HR, or designee, will conduct an immediate review of the allegations, and take any interim actions (e.g., instructing the respondent to refrain from communications with the complainant), as appropriate. If complaint is verbal, encourage the individual to complete the "Complaint Form" in writing. If he or she refuses, prepare a Complaint Form based on the verbal reporting.
- If documents, emails or phone records are relevant to the investigation, take steps to obtain and preserve them.
- Request and review all relevant documents, including all electronic communications.
- Interview all parties involved, including any relevant witnesses;
- Create a written documentation of the investigation (such as a letter, memo or email), which contains the following:
  - A list of all documents reviewed, along with a detailed summary of relevant documents;
  - A list of names of those interviewed, along with a detailed summary of their statements;
  - A timeline of events;
  - A summary of prior relevant incidents, reported or unreported; and
  - The basis for the decision and final resolution of the complaint, together with any corrective action(s).
- Keep the written documentation and associated documents in a secure and confidential location.
- Promptly notify the individual who reported and the individual(s) about whom the complaint was made of the final determination and implement any corrective actions identified in the written document.

**5. ASSOCIATED DOCUMENTS**

- a. Complaint Form

**6. ASSOCIATED RECORDS**

- a. None

## 1. PURPOSE

- a. The purpose of this procedure is to develop a system of ensuring the confidential matters of Human Technologies are safeguarded at all times.

## 2. SCOPE

- a. This procedure applies to all Human Technologies Corporation facilities and staff.

## 3. DEFINITIONS & ACRONYMS

- a. Board - All HT board members are exempt
- b. Company – Human Technologies
- c. Exempt Visitors – Individual such as: Fed-Ex, postal services, pick up and/or deliveries not moving beyond the general waiting area.
- d. HT – Human Technologies
- e. Sponsor Employee – Any Human Technologies Corporation employee who has requested the visitor to gain access to company facilities
- f. Visitor – All individuals who are not employees or individuals receiving services from Human Technologies Corporation

## 4. PROCEDURE

### a. Sign-In

- i. In order to maintain records of who is present on sites at all time, visitors will sign in at the front desk when they arrive at any facilities owned or operated by HT. It is imperative that all visitors follow this procedure so that staff is aware of their presence in case of an emergency.
- ii. All visitors will sign out when exiting the company.
- iii. Visitors will be assigned a badge that must be worn while on company grounds and appropriately turned back in when exiting.

### b. Visitor Confidentiality and Non-Disclosure Agreement

- i. Visitors must sign a Visitor Confidentiality and Non-Disclosure form upon entering for their first visit to HT.
- ii. Exempt visitors are not required to sign agreement.
- iii. Copies of signed agreements will be issued upon request of the visiting party.
- iv. Visitor refusal to sign agreement will result in lack of entry to HT facilities.

- v. Signed visitor agreements and visitor logs will be turned in weekly as instructed by the Assistant to the President.

**c. Visitor Sponsor**

- i. All visitors shall be accompanied by an HT sponsor employee with exceptions given to contractors or vendors who are on an extended assignment.

**5. ASSOCIATED DOCUMENTS**

- a. Visitor Confidentiality and Non-Disclosure Form

**6. ASSOCIATED RECORDS**

- a. None

**WHISTLEBLOWER POLICY**  
**of**  
**HUMAN TECHNOLOGIES CORPORATION**

Adopted on April 27, 2022

All directors, officers, employees, and volunteers of Human Technologies Corporation (“HTC”), in the performance of their duties, shall conduct themselves with honesty and integrity and observe the highest standards of business and personal including its Conflict of Interest and Confidentiality Policy (collectively, “HTC’s Policies”) as well as in accordance with all applicable laws, rules and regulations (collectively, the “Applicable Legal Requirements”).

Each director, officer, employee, and volunteer of HTC is responsible to make a complaint (each, individually a “Complaint” and, collectively, the “Complaints”) with respect to any action or suspected action taken by or within HTC that is or may be illegal, fraudulent or in violation of HTC’s Policies and/or any Applicable Legal Requirements. Anyone making a Complaint must be acting in good faith and have a reasonable basis for making such Complaint.

Complaints shall be made to HTC’s President/CEO who is hereby designated to administer this Whistleblower Policy (the “Policy Administrator”) and coordinate further action with regard thereto. To the extent that a Complaint involves HTC’s President/CEO, HTC’s Chair of the Audit and Finance Committee shall serve as the Policy Administrator. The Policy Administrator shall investigate and handle each Complaint in a timely manner, and shall report to the Audit Committee with respect thereto.

The Policy Administrator shall take such steps as are reasonable or practicable under the circumstances to preserve the confidentiality of any Complaint and any information reported in connection therewith. Such information shall be disclosed only to the extent necessary to facilitate the investigation and review of the Complaint or as otherwise may be required by law or this Policy.

Any person who is the subject of a Complaint may not be present at or participate in board or committee deliberations or voting on the matter relating to the Complaint (although the board or committee will be allowed to request that person present background information or answer questions prior to the commencement of deliberations or voting).

Complaints may also be made to public bodies if permitted under Applicable Legal Requirements, provided they comply with Applicable Legal Requirements.

No director, officer, employee or volunteer of HTC or, in the case of New York Labor Law §740.1(a), any other individual defined as an "employee" under New York Labor Law §740.1(a) who, acting in good faith and having a reasonable basis therefore, makes a Complaint or otherwise exercises their rights under any Applicable Legal Requirement, including, but not limited to, reporting to a public body, shall (1) suffer or be threatened to suffer any intimidation, harassment, discrimination or other retaliation; (2) in the case of employees, be subject to adverse employment consequence, including, but not limited to, discharge, suspension or demotion; (3) be subject to actions or threats to take actions that would adversely impact a former employee's current or future employment; or (4) be subject to contact or threats of contact with the United States immigration authorities or otherwise reporting or threatening to report an employee's suspected citizenship or immigration status or the suspected citizenship or immigration status of an



employee's family or household member ("Retaliating Conduct"). Anyone who engages in Retaliating Conduct against someone who, acting in good faith and with a reasonable basis therefore, makes a Complaint or otherwise exercises their rights under any Applicable Legal Requirements, will be subject to disciplinary action, including, but not limited to, termination of employment or removal as a Board member, volunteer or contractor. Regardless, any claim of retaliation will be taken and treated seriously and irrespective of the outcome of the Complaint, will be treated as a separate offense. Any Complaint made or action taken that proves to have been made in bad faith and without a reasonable basis therefore, will be viewed as a serious disciplinary offense.

A copy of this Whistleblower Policy shall be distributed to all directors, officers, employees, and volunteers of HTC who provide substantial services to HTC.

# Workplace Rules for Environmental Services (ES) & Facilities Management Services (FMS)

**You are part of a team of people that works together and strives to exceed expectations.  
As a member of the team, everyone has to follow the same rules as listed in this handout:**

- ⌚ It is important that you are always dressed in the appropriate attire. Once you are issued uniforms, you should come to work in complete uniform. Your uniform consists of long pants, shirt and sneakers or boots. Your clothes must be clean and neat, free from any offensive slogans. If you are wearing a hat, the bill of the hat should be facing forward. You will be properly groomed and looking professional.
- ⌚ Your name badge is part of your uniform and will be displayed on your shirt at all times while on the job site.
- ⌚ It is your responsibility to come to work on time and prepared to begin work.
- ⌚ **When unable to work your scheduled hours you must call your supervisor 2 hours prior to your shift start time.**
- ⌚ If you need to take time off or leave early for an appointment, you must request time off from your supervisor as far in advance as possible.
- ⌚ Everyone should treat supervisors and coworkers with respect and courtesy.
- ⌚ Report all unsafe conditions to your supervisor immediately.
- ⌚ Report all accidents to your supervisor immediately.
- ⌚ Cell phone use is **not allowed** during work hours, unless there is an emergency. Phones may be used during lunch and breaks only.
  - *Use of an electronic device to listen to music/media, may be permitted with the use of a single ear bud so long as it does not impact your, or others, ability to complete designated tasks.*
- ⌚ Human Technologies is a tobacco free company. The use by any person at any time of any tobacco product, whether by smoking, chewing, vaping (e-cigarettes) or any other manner, is prohibited in or on any property owned, leased, operated or otherwise controlled by Human Technologies or its affiliates, to include: building, offices, grounds, parking lots, driveways, walkways, vehicles owned or leased by Human Technologies or situated on any space owned, leased, operated or otherwise controlled by Human Technologies. *Smoking is permitted in designated areas only when working at a customer site.*
- ⌚ When working from a Human Technologies' vehicle, the vehicle must be left clean and supplies filled for the next crew.
- ⌚ The borrowing or lending of money between employees, including supervisors, is not allowed.
- ⌚ Illegal drugs, alcohol or weapons are not allowed on company grounds, work site or at any company function.
- ⌚ Working while under the influence of alcohol/illegal drugs is not allowed. If you are under the influence of such, you will be subject to disciplinary action up to and including termination.
- ⌚ You are allowed two 15 minute breaks and one ½ hour unpaid meal period during a full time shift. Should you be working less than a full time shift, your breaks and meal period will be adjusted accordingly.

- ⌚ **While working at a customer site it is against company policy to remove items from the site that belong to the customer or any of the customer's employees, including money or other items found on the floor.**
- ⌚ If there are items that appear to be garbage but you are unsure, before throwing away check with supervisor for approval. The supervisor will check with the customer before disposing.
- ⌚ **Customer property can not be removed from the customer site, even if it appears to be trash and the customer says it is ok to take the material. This includes bottles/can with deposits.**
- ⌚ When working in an area, you must return all items to the same location that you found them.  
For example:
  - Return contents of a desk after dusting, to their same location on the desk.
  - When emptying a garbage can from an office, return it to the same location.
  - If moving furniture, return to same location
  - Etc...
- ⌚ While working at a customer site it is against company policy to consume any food or drink that belongs to the customer or any of the customer's employees unless you have prior approval from your supervisor. Examples of these items are:
  - Candy on a desk
  - Food in a break room
  - Food out of a refrigerator
  - Fund raiser boxes (unless you have paid for the item)
  - Food or drink left behind after a meeting
  - You are not permitted to use the customer's property, such as:
    - Computer
    - Telephone
    - Desk
    - Office Machines (copier, fax, etc.)

### **Expectations**

Our customer's have high expectations. Therefore, Human Technologies has the following expectations of you:

- ⌚ Strive to produce at or above established standards at all times.
- ⌚ Produce at 100% quality.
- ⌚ Deliver exceptional customer service.
- ⌚ Maintain a good attendance record and be on time for all scheduled shifts.
- ⌚ Maintain a clean and safe work environment.
- ⌚ Demonstrate a positive attitude and maintain a team atmosphere in the department.

# Workplace Rules for Logistics & Manufacturing (L&M)

**You are part of a team of people that works together and strives to exceed expectations.  
As a member of the team, everyone has to follow the same rules as listed in this handout:**

- 🕒 It is important that you are always dressed in the appropriate attire. Your clothes must be clean and neat and free from any offensive slogans. If you are wearing a hat, the bill of the hat should be facing forward. You will be properly groomed and looking professional. Shoes with closed toe and heel must be worn when on the work floor.
- 🕒 Your name badge must be displayed on your person at all times while on the job site.
- 🕒 It is your responsibility to come to work on time and prepared to begin work.
- 🕒 **When unable to work your scheduled hours, you must notify your supervisor no later than 15 minutes beyond your normal start time.**
- 🕒 If you need to take time off or leave early for an appointment, you must request time off from your supervisor as far in advance as possible.
- 🕒 Everyone should treat supervisors and coworkers with respect and courtesy.
- 🕒 Report all unsafe conditions to your supervisor immediately.
- 🕒 Report all accidents to your supervisor immediately.
- 🕒 Cell phone use is **not allowed** during work hours, unless there is an emergency and you have received approval from your supervisor/manager. Phones may be used during lunch and breaks only.
  - *Use of an electronic device to listen to music/media, may be permitted with the use of a single ear bud so long as it does not impact your, or others, ability to complete designated tasks.*
- 🕒 Human Technologies is a tobacco free company. The use by any person at any time of any tobacco product, whether by smoking, chewing, vaping (e-cigarettes) or any other manner, is prohibited in or on any property owned, leased, operated or otherwise controlled by Human Technologies or its affiliates, to include: building, offices, grounds, parking lots, driveways, walkways, vehicles owned or leased by Human Technologies or situated on any space owned, leased, operated or otherwise controlled by Human Technologies.
- 🕒 The borrowing or lending of money between employees, including supervisors, is not allowed.
- 🕒 Illegal drugs, alcohol or weapons are not allowed on company grounds, work site or at any company function.
- 🕒 Working while under the influence of alcohol/illegal drugs is not allowed. If you are under the influence of such, you will be subject to disciplinary action up to and including termination.
- 🕒 You are allowed two 15 minute breaks and one ½ hour unpaid meal period during a full time shift. Should you be working less than a full time shift, your breaks and meal period may be adjusted accordingly.
- 🕒 Bags and other personal belongings must fit inside lockers and cannot be brought to the work floor.
- 🕒 Other than water or other liquids held inside closed containers, no food or beverages are allowed on the work floor.

## **Expectations**

Our customer's have high expectations. Therefore, Human Technologies has the following expectations of you:

- 🕒 Strive to produce at or above established standards at all times.
- 🕒 Produce at 100% quality.
- 🕒 Deliver exceptional customer service.
- 🕒 Maintain a good attendance record and be on time for all scheduled shifts.
- 🕒 Maintain a clean and safe work environment.
- 🕒 Demonstrate a positive attitude and maintain a team atmosphere in the department.