



Goodwin
Living

Team Member
Handbook
2024

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INTRODUCTION

Welcome!

We are so pleased that you have chosen to share your abilities and commitment with us, and we would like to extend a very warm welcome to you on behalf of the Goodwin Living family.

You and your team members are our greatest resource at Goodwin Living. Without each one of you, we could not deliver the high standard of senior living services for which Goodwin Living is known. The Human Resources Department supports all team members, and, for that reason, we maintain an open-door policy. All team members are invited to drop in and let us know how you are doing. We are always interested in hearing your suggestions on ways to improve the work environment at Goodwin Living. Please visit us and let us get to know you better.

This Handbook is designed to be a reference for you, and we will update it on occasion. While the Human Resources team is available to answer any questions and respond to any concerns, many of the Goodwin Living policies and procedures are in this Handbook. The Handbook is not to be considered exhaustive, but it does cover the most common issues faced by our team members. Goodwin Living is committed to complying with all federal, state and local labor and employment laws. To the extent any provision of this Handbook conflicts with any law, the requirements of that law will prevail. For more information on a specific policy or procedure, please contact your supervisor or visit us in Human Resources.

Goodwin Living reserves the right to change, add to, or eliminate any of the policies and benefits described in this Handbook at any time without advance notice and at its sole discretion, except as required by law. Employment at Goodwin Living is at-will as described in the “At-will Employment section,” which may only be modified by an express written agreement signed by you and Goodwin Living’s President and CEO.

Where “Goodwin Living” is used in this Handbook, it should be understood as applying to Goodwin Living (GL) and all its affiliated organizations, including all Goodwin Living entities inclusive of life-plan communities, rentals and Home and Community-Based Services.

For the most up-to-date information, please refer to the electronic version of this Handbook, located on ADP. If you do not have convenient access to the electronic version, please visit Human Resources for a copy of the most up-to-date version. As a team member, it is your responsibility to be familiar with Goodwin Living policies and procedures.

NEITHER THIS HANDBOOK NOR ANY OTHER COMPANY GUIDELINES, POLICIES, OR PRACTICES CREATE AN EMPLOYMENT CONTRACT, BARGAIN, OR AGREEMENT OR CONFER ANY CONTRACTUAL RIGHTS WHATSOEVER.

We want to give special thanks to the Goodwin Living team members who assisted with the creation of this new edition of the Handbook. If you have suggestions for how we can improve the Handbook, please let us know.

Please don't forget, the Human Resources team is here for you. If you have a need, question, or concern; if you are ever uncertain as to how to respond to a given situation; if you have an idea for how we can help you perform your job better and develop professionally; please do not hesitate to talk to your supervisor or come to us. We want to see you succeed and grow, and we will be happy to provide whatever guidance and support we can.

The first section of this Handbook introduces you to the vision, mission, and values of Goodwin Living. These brief statements define what we stand for, how we want to serve, how we want to be known, and how we will act.

Our Vision

Expanding the places and ways we serve older adults.

Our vision says that we are about service and about older adults. The word “expanding” has multiple meanings. It means that we want to grow to serve more individuals, but it also means that we are continually open to looking at new and better ways of serving older adults. We rely on all our team members to share ideas about how we can improve the way we serve those who have put their trust in us.

Our Mission

The mission of Goodwin Living is to support, honor and uplift the lives of older adults and the people who care for them through a faith-based, nonprofit organization affiliated with the Episcopal Church.

The mission statement makes it clear that this organization is committed to “support, honor, and uplift” the lives of older adults but also to support, honor and uplift those who care for older adults. This mission specifically includes all the people we serve, our team members, and the hundreds of family members and friends connected to the people of Goodwin Living. If you ask our team members why they work at Goodwin Living or why they have stayed so long, you will always hear: “because I enjoy the residents, members, and patients.” Likewise, our residents, members, and patients recognize that this community would not be what it is without its dedicated staff.

Organizational Values

Service	The call to service is the foundation of our mission.
Integrity	We value the trust of others and by our actions endeavor to be worthy of that trust.
Community	We seek to create and sustain strong and caring communities where those who live, work and visit will find places of welcome and belonging.
Individuality	We believe that each person is of sacred worth. We celebrate the uniqueness and diversity of the members of our community.
Excellence	What we do, we will do well. We strive for excellence in capability and execution.
Leadership And Learning	We seek to learn so that we can lead.
Heritage	We honor and remember the wisdom, charity and dedication of those who created this organization, and seek to serve with the purpose and faith they intended.
Growth	We commit to broaden and extend our charitable purpose and mission through thoughtful and prudent growth.

Our value statements represent the beliefs and ethical guidelines that direct and assist us in how we make decisions.

These three statements are the platform from which we serve. They help make Goodwin Living a unique place to live and work.

GOODWIN LIVING CARES

All Goodwin Living team members are expected to live by the GL CARES philosophy.

Consistent Service
Accountability
Respect
Empowerment
Safety

GL CARES is explained to all new team members during their orientation. It is important that the principles taught are adhered to by all.

Diversity

Goodwin Living is committed to providing a work environment that is free of discrimination, harassment and intimidation because of race, traits historically associated with race (such as hairstyles), gender, ethnicity, national origin, age, religion, sexual orientation, gender identity, disability, veteran status, or other legally protected status. We recognize and value the richness of diversity and strive to tap the individual motivation in each team member. Our expectation is that all team members will meet the same high standards in providing quality service to our residents, members, patients and each other (“residents” as used throughout the handbook are inclusive of patients and members). Our goal is to promote a climate that encourages respect for all individuals, open communication and fair treatment of all people.

COMPLIANCE PROGRAM

Code of Conduct Preamble

Working in a senior care environment is a privilege and a noble endeavor. We challenge and expect all of our team members to deliver the care and service that we would want for ourselves and our loved ones.

Life at Goodwin Living is a new experience for the residents, representing a major and sometimes emotionally difficult transition. It is critical that team members, by our cheerful, professional attitudes, make residents, members, and patients feel welcome and at home. All employees are expected to observe the highest ethical standards in all dealings with residents, members, and patients, other team members, consultants and vendors servicing Goodwin Living. No team member shall do anything illegal in the performance of his or her job, and it is equally important that team members exercise sound moral judgment and promote the highest ethical standards at all times.

In other words, no team member should put himself/herself/their self in a position where someone could question the intent of his/her/their actions from a legal or ethical standpoint, including conflicts of interest or lapses in good judgment. Not only do we require this standard for the benefit of our valued residents and committed team members who deserve a fair and equitable working environment, but also for your own protection. Exercising common sense, compassion and commitment every day will help you excel at Goodwin Living.

While working here, you will become aware of personal, confidential information concerning residents, members, and patients. Unless it is professionally necessary, such information must never be discussed with others. Should anyone ask you for such information, tactfully decline and refer the question to your supervisor.

All criticisms and concerns should be referred to your supervisor or department head. Professional or personal problems or issues should never be discussed with residents, members, patients or family members. Such discussions would violate our Code of Conduct.

Remember that courtesy and respect towards all the people we serve, including co-workers are essential. You are assuming a position of trust, based upon our respect for you, and you should take pride in that responsibility. All team members should strive to provide the highest quality care. This will be possible only by a unified “team effort” built upon mutual trust and open communication.

The typical team member tenure is long at Goodwin Living, due largely to the workplace environment we have established and actively nurture. The positive atmosphere stems from a commitment to the highest ethical standards and mutual respect.

Code of Conduct

It is the intent of the Board of Trustees and management of all Goodwin Living (GL) communities, as well as its affiliated organizations — Goodwin Living Foundation, Goodwin Living Community Services and Goodwin Living Development Corporation — to conduct all business with our residents, members, patients, employees, vendors and third-party payers in a professional manner, emphasizing integrity, honesty and fair dealing. Therefore, Goodwin Living has established standards, policies and procedures to prevent illegal, fraudulent or abusive (e.g., not defrauding Medicare/Medicaid or abusing residents) activities in the delivery of health care and other services within the organization. Where “Goodwin Living” and “GL” are used in this Code of Conduct, it should be understood as applying to Goodwin Living and its affiliated organizations (i.e., Goodwin Living Foundation, Goodwin Living Community Services and Goodwin Living Development Corporation).

All team members, Board members, physicians, contractors and vendors are responsible for ensuring that their conduct is consistent with the Code of Conduct. Conduct that violates the Code of Conduct may result in disciplinary action up to and including termination of employment or other business relationship with Goodwin Living.

The observance of these rules includes, but is not limited to, the following practices:

1. We will endeavor to provide the highest possible quality of care for our residents and to observe the best practices standards.
2. We will respect our residents’ dignity and will treat them with consideration, courtesy and respect. The trust and confidence of our residents is one of our greatest assets and is earned by providing services in a caring and professional manner.
3. We will not use a resident’s/member’s/patient’s financial or other resources for personal or improper purposes, or permit others to do so, regardless of whether the resident has consented to the arrangement.
4. We will only employ or work with persons with proper credentials, experience and expertise. We will maintain an appropriate level of professional knowledge to conform to the standards of our respective professions, and exercise sound judgment in the performance of our duties.
5. We will not ignore or cover up any deficiency or error. Any problem will be brought to the attention of those who can properly assess and resolve the problem.
6. We will take immediate action and report to the appropriate authorities, as required by Goodwin Living policies and procedures and by law, any incident of exploitation, mistreatment, neglect or abuse of a resident /patients.

7. We will comply with all laws, regulations, standards and other requirements imposed by any level of government to which the organization is subject, including, but not limited to, those related to the Medicaid and Medicare programs.
8. We will not use our positions to profit personally, or to assist others in profiting, at the expense of the organization. We will avoid conflicts of interest. A conflict of interest generally exists when our personal interests or activities could influence our judgment in the performance of our duties.
9. We will not pursue any business opportunity that requires engaging in unethical or illegal activity.
10. We will not offer kickbacks or inducements to our customers to obtain their business or for the purpose of billing third parties.
11. We will not give kickbacks or rebates to other providers for performing billable services to our customers. We will pay only in accordance with established fee schedules that are usual and customary for the services provided.
12. We will not pay team members, physicians or other health care professionals, directly or indirectly, in cash or by any other means, for referrals of residents.
13. We will not accept gifts or gratuities, directly or indirectly, in cash or by any other means, from residents, members, patients, physicians, other health care professionals, vendors, suppliers and other similar individuals or organizations in connection with our work. Occasional non-cash gifts provided by a vendor that are limited to reasonable meal and entertainment expenditures in the ordinary course of business or that are of nominal value, although not expressly prohibited, are discouraged.
14. We will report to management any potential conflicts of interest concerning our family members or ourselves.
15. We will not enter into any joint venture, partnership or other risk sharing arrangement with any entity that is a potential or actual referral source unless the arrangement has been reviewed and approved by Goodwin Living's legal counsel.
16. We will bill only for services rendered and in accordance with established fee schedules and submit claims only for covered items and services. To the best of our ability, we will bill in a timely and accurate fashion.
17. We will act promptly to investigate and correct the problem if errors in billings and/or claims that have been submitted are discovered.
18. We will respect and protect the confidentiality of resident records and other personal resident

information. We have a legal obligation to safeguard and maintain the confidentiality of information about our residents, members, and patients. A resident's medical, financial or other personal information will not be disclosed to anyone except as permitted by law and by Goodwin Living policy or with the resident's permission.

19. Goodwin Living has an obligation to maintain the confidentiality of personal information related to team members and to prevent the release of this information beyond those individuals who have a business-related need for it. Personnel files, payroll information, disciplinary matters and other personal information will be maintained in a manner designed to ensure confidentiality.
20. We are responsible and accountable for the proper use of Goodwin Living's funds and property and for accurately reporting financial transactions involving the organization. All financial reports, accounting records, expense accounts, time sheets and other documents must be accurate and completed in accordance with Goodwin Living's policies and legal requirements.
21. We will endeavor to ensure that the books and records of Goodwin Living are accurate and fairly reflect Goodwin Living's financial position and results of operations.
22. We will report all known or suspected practices or incidents that may violate this Code of Conduct, Goodwin Living's Compliance Policies, operational policies and any law or regulation to the appropriate levels of management. Any employee, resident or other individual reporting a violation may do so without fear of retribution.

Corporate policies governing Goodwin Living's business practices and the Code of Conduct are set forth in this Team Member Handbook, as well as corporate and community policy and procedures manuals and employee job descriptions.

Compliance Officials

The Board of Trustees has appointed the Chief Financial Officer and Chief People Officer to serve as Co-Compliance Officers of Goodwin Living. The Compliance Officers are responsible for establishing standards for the organization, for communicating appropriate compliance policies and programs, and for the implementation and enforcement of such policies. When in the best interest of the organization, the Compliance Officers, in cooperation with the President and Chief Executive Officer, will appoint Compliance Task Forces to assist the Compliance Officers in the fulfillment of their duties.

The Compliance Officers shall provide timely, accurate reports to the Board of Trustees to enable management and the Board to reach informed judgments concerning the organization's business performance and the organization's compliance with laws, regulations and standards.

The name of the Compliance Officers and any Compliance Task Force members will be made public, and team members, residents, members, patients and others will be advised of whom to contact if a compliance issue arises.

Reporting Suspected Misconduct

Goodwin Living encourages as much feedback as possible from team members, persons served and others regarding observed or suspected misconduct and makes every effort to keep track of emergent problems and issues as perceived by the organization's team members, residents and others. In the event an individual wishes to report suspected wrongdoing, inquire about practices and policies, and/or obtain information about Goodwin Living's Compliance Program, the following avenues of communication are available:

Individuals may contact the Compliance Officers for anonymous reporting of suspected misconduct at any Goodwin Living community by calling the Goodwin Living Compliance Hotline at (703) 824-1589. To enhance confidentiality, this number is accessible only by the Co-Compliance Officers and is utilized for no other business purpose. Confidential messages can be left at this number, twenty-four hours a day.

Individuals may send an anonymous letter to the Co-Compliance Officers stating concerns, questions, observations, etc., addressed to:

Chief Financial Officer
Attention: Compliance Officer
Goodwin Living
4800 Fillmore Avenue
Alexandria, VA 22311

Or

Chief People Officer
Attention: Compliance Officer
Goodwin Living
4800 Fillmore Avenue
Alexandria, VA 22311

The above reporting mechanisms will be posted prominently at all Goodwin Living communities. All communications regarding observed or suspected misconduct will be handled confidentially, to the extent possible.

Individuals reporting observed or suspected misconduct may do so without fear of retribution. Goodwin Living will not enact, permit, or otherwise tolerate retaliation against any individual who, in good faith, reports a compliance-related concern or question. An individual who is involved in wrongdoing and reports it may be subject to disciplinary action for his or her wrongdoing, although his or her forthrightness will be taken into consideration as the matter is investigated.

Compliance Information and Education

Goodwin Living has established guidelines for team members in doing what is right, appropriate, and proper in the conduct of business, and to ensure that team members know, understand and comply with the legal requirements that apply to our industry. Goodwin Living's orientation program for new team members and annual in-service training for current team members shall include training and education in the compliance process and Goodwin Living's Code of Conduct. The scope and schedule of topics for this training shall be developed by the Compliance Officers in cooperation with Human Resources. Significant changes in applicable federal, state and/or local laws affecting Goodwin Living's team members and/or programs will be reported, as needed, in a team member newsletter.

As part of new team member orientation and/or annual in-service training, each team member will be required to sign a certification that they have read and understand the Code of Conduct and is familiar with Goodwin Living's compliance process and commitment to compliance.

Internal Compliance Audits

Goodwin Living has established internal controls to provide management and the Board of Trustees with a procedure by which the organization's systems (including, but not limited to, accounting, financial and audit systems) can be reviewed and evaluated. The Compliance Officers have the responsibility to develop an internal audit function to ensure that Goodwin Living's Compliance Program is actively implemented and that policies are appropriately and consistently enforced. All potentially fraudulent activities will be promptly investigated to determine if a violation has occurred, and corrective actions will be implemented where needed. The Compliance Officers, with the advice of Goodwin Living's legal counsel, will conduct such investigations. A Compliance Task Force may be appointed by the Compliance Officers, in consultation with the President and Chief Executive Officer, to assist the Compliance Officers in such investigations. Upon discovery of potential improprieties, the organization, fully understanding its reporting and/or disclosure responsibility, shall obtain the advice of legal counsel on how to respond with regard to any voluntary disclosure to the government.

Goodwin Living's Board of Trustees has the ultimate responsibility to ensure that adequate compliance controls are in place and to hold management accountable through the Board's governance. As required by the Code of Virginia, Board members annually provide certification that they are not and have not been involved in or convicted of any felonious, fraudulent or illegal activities.

Persons or Entities Ineligible for Federal Programs

Goodwin Living will not knowingly employ any individual or entity that is listed by a federal agency as debarred, suspended or otherwise ineligible for federal programs.

To carry out this policy, Goodwin Living's Human Resources Department, in compliance with applicable federal and state law, will make reasonable inquiry of any current or potential team members. Goodwin Living's application for employment forms will include a question asking whether the applicant has ever

been excluded from Medicare, Medicaid or any other federal or state program. If the answer is “yes,” the applicant will be asked to provide a letter of reinstatement.

Goodwin Living’s Human Resources Department personnel shall routinely, as part of the organization’s employment policies, follow federal and state law requirements for criminal background checks and shall consult the appropriate registry to ensure that applicants have not been reported for abuse, neglect or misappropriation of an individual’s property.

Privacy — Health Insurance Portability and Accountability Act (HIPAA)

Goodwin Living is committed to ensuring the privacy and security of our residents’ personal health information. We further recognize that an individual’s rights are a critical aspect of maintaining quality care and services, and we are committed to allowing our residents to exercise their rights in compliance with various federal, state, and local laws and regulations.

To comply with the federal privacy rights established by Congress in 1996 (under the Health Insurance Portability and Accountability Act, also known as “HIPAA”) and the regulations subsequently established by the Department of Health and Human Services (the “Privacy Rule”), Goodwin Living has adopted written policies and procedures to address access, use and disclosure of “individually identifiable health information,” also known as “protected health information” or “PHI.” Policies and procedures related to HIPAA are available in the HIPAA directory located in the GL Shared directory.

This means that Goodwin Living has policies and procedures addressing who has access to PHI, how such information may be used by Goodwin Living and how such information may be shared or disclosed outside of Goodwin Living. As a team member of Goodwin Living, you are expected to honor and abide by these policies and procedures. Violations can be serious, and may result in termination of employment, individual fines or imprisonment for gross misconduct imposed by governmental authorities.

To that end, Goodwin Living also has published and shared with each resident a Notice of Privacy Practices that informs them about their privacy rights, possible uses and disclosures of PHI, and Goodwin Living’s obligations regarding their PHI.

This Notice is included in the New Employee Orientation packet and information on HIPAA and privacy is reviewed upon hire, as part of New Employee Orientation, and annually thereafter. Please read it carefully. Though its aim is to inform our residents, you may have similar rights when accessing health care services outside of Goodwin Living. The Notice of Privacy Practices also informs you of how to contact Goodwin Living’s Privacy Officer if you wish additional information. The Privacy Officer serves as a focal point for privacy-related activities and is responsible for implementing policies and procedures, arranging educational programs, and conducting periodic reviews to ensure our ongoing compliance with privacy regulations. Think of the Privacy Office as a resource who can help you with any questions or concerns you might have about privacy-related issues at Goodwin Living. You are required to notify the Privacy Officer or Co-compliance officer if you believe a HIPAA violation has occurred. Additionally, you should notify the Privacy Officer if you have any complaints related to Goodwin Living’s use or disclosure of PHI, or if you

wish to anonymously report a violation of Goodwin Living's practices and/or procedures related to HIPAA.

Elder Justice Act

Reporting Reasonable Suspicion of a Crime

All team members of *Goodwin Living* have the following responsibilities and rights under Federal law:

If you reasonably suspect that a crime has occurred against a resident or person receiving care in Goodwin Living, you must report that suspicion to the **police and State Survey Agency** or if you are not comfortable contacting the authorities directly, you must report the occurrence to either the Social Worker team, Director of Nursing, or Executive Director immediately; however, it is your responsibility to confirm that the appropriate agencies were notified:

Alexandria City Police Department 703-838-4444

Fairfax County Police Department 703-256-8035

Virginia Department of Health 1-800-828-1120

You must make the report within two (2) hours to the **police and State Survey Agency**, or to the Social Work team, Director of Nursing, or Executive Director, after you first suspect that a crime has occurred if the suspected crime involves serious bodily injury to the individual, or within 24 hours if there is no serious bodily injury involved.

In addition to contacting the above authorities, please notify the Social Worker, Director of Nursing, or the Executive Director so that prompt and appropriate action may be taken.

WARNING: If you fail to report your reasonable suspicion of a crime, you may be subject to a civil monetary penalty of up to \$300,000 and/or you may be excluded from participation in any Federal health care program.

No Retaliation

Goodwin Living cannot punish you or otherwise retaliate against you for reporting your reasonable suspicion of a crime against a resident or person receiving care from this facility.

Right to Make a Complaint

You have the right to make a complaint to the Virginia Department of Health (1-800-828-1120) if Goodwin Living punishes you or otherwise retaliates against you for reporting your reasonable suspicion of a crime against a resident or person receiving care from this facility. Please see Goodwin Living's policies and procedures manual for additional details regarding your responsibilities and rights under the federal law.

EMPLOYMENT

At-will Employment

Employment at Goodwin Living is “at-will.” This means that either the team member or Goodwin Living can terminate the employment relationship at any time, for any reason, without advance notice or cause. No one other than the President and CEO of Goodwin Living may enter into an agreement for employment for a specific period of time or make any agreement contrary to the policy of at-will employment. Any such agreement must be in writing signed by the President and CEO of Goodwin Living and the team member.

Equal Opportunity Employment

Goodwin Living prohibits discrimination and harassment of any type and affords equal employment opportunities to employees and applicants without regard to race, traits historically associated with race (such as hairstyles), color, gender, national origin, age, religion, sexual orientation, gender identity or expression, pregnancy, childbirth and related conditions, disability status, marital status, genetic information, military service or protected veteran status, or any other status protected by applicable federal, state or local laws and ordinances. We will make all employment and promotion decisions so as to further equal employment opportunities by imposing only valid requirements for employment and promotion opportunities. All personnel actions including hiring, placement, promotion, transfer, demotion, layoff, terminations, recruitment, pay and other forms of compensation, benefits, company-sponsored training, education, tuition assistance, social and recreational programs will be administered in compliance with all applicable laws relating to discrimination.

Unlawful discrimination is not tolerated in any form in our organization. Any team member who believes he or she has been unlawfully discriminated against or has otherwise been treated in violation of this policy should report it to his or her supervisor, Human Resources, or the Executive Director. All complaints will be appropriately investigated, as defined in the Harassment Policy.

No team member will be subject to, and Goodwin Living prohibits, any form of discipline or retaliation for reporting perceived violations of this policy, pursuing any such claim, or cooperating in any way in the investigation of such claims.

Prohibited Harassment

All Goodwin Living team members and applicants are entitled to be treated with dignity and respect. We do not permit unlawful harassment of applicants or team members by another team member, supervisor, vendor/contractor, customer, resident, member, or any third party.

We support and are fully committed to the principle of Equal Employment Opportunity, and we adhere to that policy in accordance with applicable federal, state and local laws. Any form of harassment on the basis of race, color, gender, national origin, age, religion, sexual orientation, gender identity, pregnancy,

childbirth and related medical conditions, disability, marital status, genetic information, military service or veteran status, or any other status protected by federal, state or local laws and ordinances is prohibited.

Harassment is defined in this policy as unwelcome verbal, visual, or physical conduct, based on an individual's protected characteristic, creating an intimidating, offensive, or hostile work environment that interferes with work performance. Harassment can be verbal (including slurs, jokes, insults, epithets, gestures or teasing), graphic (including offensive posters, symbols, cartoons, drawings, computer displays, or e-mails) or physical conduct (including physically threatening another, blocking someone's way, etc.) that denigrates or shows hostility or aversion towards an individual because of any protected characteristic. Such conduct violates this policy, even if it is not unlawful. Because it is difficult to define unlawful harassment, employees are expected to behave at all times in a professional and respectful manner.

Sexual harassment can include all of the above actions, as well as other unwelcome conduct. Sexual harassment is defined by the federal Equal Employment Opportunity Commission as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when, for example: a) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, b) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or c) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment can be physical and psychological in nature. An aggregation of incidents can constitute sexual harassment even if one of the incidents considered on its own would not be harassing. Examples of acts that can constitute unlawful sexual harassment include, but are not limited to:

- making comments about a person's clothing, body or personal life;
- addressing an individual with a nickname or term of endearment not of that individual's choosing;
- telling sexual jokes;
- making sexual innuendoes;
- subtle pressure for sexual activities;
- unwanted touching, hugging, patting, pinching or kissing;
- unwanted overtures of a sexual nature;
- leering at a person's body
- displaying obscene, vulgar, or offensive pictures or materials such as posters, cartoons and drawings;
- requests for sexual favors or demands for sexual favors in exchange for favorable treatment;
- sexually explicit e-mails or voicemails;
- unwelcome sexually related comments;
- conversations about one's own or someone else's sex life;

- conduct or comments targeted at only one gender, even if the content is not sexual;
- teasing or other conduct directed toward a person because of the person's gender.

Common sense, compassion, sensitivity and decency will help protect you from charges of harassment. The assumption that our behavior is acceptable to everyone with whom we come in contact can create a difficult situation for everyone involved. Whether harassment is intended or not, you may be appropriately accused of harassment if your behavior is unacceptable to another individual. Be aware of how people respond to whatever you do or say. If an individual objects to your behavior toward them, listen to and pay attention to the objections. What is acceptable behavior to some people is not always acceptable behavior to others.

Reporting Procedure

Goodwin Living will investigate promptly any allegation of harassment. If it is determined that harassment has occurred, we will take appropriate disciplinary action, which may include discharge of the offending employee.

If you ever feel you are being harassed or if you believe you have witnessed harassment in violation of this policy, you should promptly take the following steps:

1. Respond immediately; do not ignore the problem. Please notify Human Resources as soon as possible.
2. If you make a complaint under this policy and have not received a satisfactory response that an investigation is underway within five (5) business days, you should contact the Chief People Officer or the Executive Director, and then to the President and CEO for resolution.
3. If a non-employee harasses you, contact your Department Director, Human Resources, or the Executive Director immediately for help. We will investigate and evaluate the situation to the extent possible to ensure an appropriate solution is reached.

Every member of Goodwin Living's management team is responsible for ensuring that no unlawful harassment or discrimination occurs in the workplace. Managers and supervisors must deal expeditiously and fairly when they have any knowledge of sexual harassment within their departments, whether or not there has been a written or formal complaint. They must:

1. Take all complaints or concerns of alleged or possible harassment seriously no matter how minor or who is involved.
2. Report all incidents to HR immediately so that a prompt investigation can occur.
3. Take any appropriate action to prevent retaliation or prohibited conduct from recurring during and after any investigations or complaints.

Managers and supervisors who knowingly allow or tolerate sexual harassment or retaliation, including the failure to immediately report such misconduct to HR, are in violation of this policy and subject to disciplinary action, up to and including termination.

Investigation Procedures

Goodwin Living will promptly investigate the facts and circumstances of any claim of harassment. Confidentiality will be maintained to the extent possible.

1. Investigation of a complaint of harassment will normally include talking with the complainant, alleged harasser and witnesses named by the complainant and alleged harasser.
2. Because of its sensitive nature, a complaint of harassment will be investigated by Human Resources, or the appropriate designee, with particular care and will remain confidential, to the extent possible and permitted by law. If Human Resources is involved in the complaint, the investigation will be led by the Executive Director.
3. Upon completion of the investigation, Goodwin Living will take corrective measures against any person who has engaged in conduct in violation of this policy if Goodwin Living determines such measures are necessary. These measures may include, but are not limited to, counseling, suspension or immediate termination. Anyone, regardless of position or title, whom Goodwin Living determines has engaged in conduct that violates this policy will be subject to discipline, up to and including termination.

No Retaliation

No team member will be subject to, and Goodwin Living prohibits, any form of discipline or retaliation for reporting perceived violations of this policy, pursuing any such claim, or cooperating in any way in the investigation of such claims. If a team member believes someone has violated this no-retaliation policy, they should bring the matter to the immediate attention of the Vice President of Human Resources or the Senior Director of Human Resources. Anyone, regardless of position or title, whom Goodwin Living determines has engaged in conduct that violates this policy against retaliation will be subject to discipline, up to and including termination.

It is important that you inform Goodwin Living if you feel you have been or are being harassed or have been retaliated against in violation of this policy. We cannot do anything to remedy the situation if we are not aware of it.

Reasonable Accommodation of Individuals with Disabilities

Goodwin Living recognizes and supports its obligation to reasonably accommodate job applicants and employees with disabilities who are able to perform the essential functions of the position, with or without reasonable accommodation. Goodwin Living will provide reasonable accommodations to otherwise

qualified job applicants and team members with known disabilities unless doing so would impose an undue hardship on Goodwin Living or pose a direct threat of substantial harm to the team member or others. If you believe you need a reasonable accommodation of a disability, please make your request to Human Resources.

Reasonable Accommodation of Religious Beliefs and Practices

Goodwin Living recognizes and supports its obligations to reasonably accommodate job applicants and employees with religious beliefs who are able to perform the essential functions of the position, with or without reasonable accommodation. Goodwin Living will provide reasonable accommodation to otherwise qualified job applicants and team members, unless doing so would impose an undue hardship on Goodwin Living. If you believe you need a reasonable accommodation of a religious belief or practice, please make your request to Human Resources.

Reasonable Accommodation of Pregnancy

Goodwin Living will make reasonable accommodations for pregnancy, childbirth or related medical conditions, including lactation, unless the accommodation would impose an undue hardship. Examples of reasonable accommodations include more frequent or longer bathroom breaks, breaks to express breast milk, access to a private location other than a bathroom for the expression of breast milk, acquisition or modification of equipment or access to or modification of employee seating, a temporary transfer to a less strenuous or hazardous position, assistance with manual labor, job restructuring, a modified work schedule, light duty assignments, and leave to recover from childbirth. If you believe you need a reasonable accommodation due to pregnancy, please make your request to Human Resources.

Lactation Accommodation

As part of our family-friendly policies and benefits, Goodwin Living supports breastfeeding team members by accommodating a team member who needs to express breast milk during the workday for their infant child. The break time, if possible, must run concurrently with meal periods already provided to the team member. Breaks of more than 20 minutes in length are unpaid, and the team member should notify their supervisor.

Goodwin Living will provide employees with a private area for this purpose. A small refrigerator reserved for the specific storage of breast milk is available. Any breast milk stored in the refrigerator must be labeled with the name of the employee and the date of expressing the breast milk. Any nonconforming products stored in the refrigerator may be disposed of. Employees storing milk in the refrigerator assume all responsibility for the safety of the milk and the risk of harm for any reason, including improper storage or refrigeration and tampering. Please speak to Human Resources if you have questions regarding this policy.

Job Openings and Postings

We take pride in nurturing team members professionally and providing opportunities for growth. With few exceptions, all job openings are advertised for a minimum of five consecutive days. Jobs are posted on the Goodwin Living Careers page of the website.

Application for Employment and Rehire Status

An application is an essential part of the hiring process. Misrepresentations or omissions on an application will disqualify the applicant from consideration and, if already hired, may lead to disciplinary action, up to including immediate discharge.

Applicants who have worked at Goodwin Living previously must also submit an online application for consideration in accordance with standard hiring practices. If a former team member is rehired within thirty (30) days of separation, they may retain their original date of hire for seniority purposes and the preemployment screenings may be waived. However, the following exceptions apply:

- During the first employment, if a team member is separated **before reaching one year of service**, and then returns to Goodwin Living, the original hire date is not retained and only the rehire date is honored.
- During the first employment, if a team member is terminated **after one year** of service and returns to GL **within 1 year** of that original separation date, they retain their original hire date.
- During the first employment, if a team member is terminated **after one year of service** and returns to GL **more than 1 year** after that original separation date, they do NOT retain their original hire date. The rehire date becomes their hire date.

Criminal Records Checks

All offers of employment are conditional pending the results of a criminal record check. Criminal record checks are conducted on all new team members in accordance with the Code of Virginia, Section 63.2-1720, as it relates to adult facilities and Section 32.1-126.01, as it relates to nursing facilities. All applicants must complete and sign a State of Virginia, Department of Social Services Sworn Disclosure Statement at the time of application. Goodwin Living will obtain, prior to New Employee Orientation, an original criminal record clearance. Applicants who have been convicted of “barrier” crimes are ineligible for employment, and all offers shall be withdrawn. If the team member is already working, the employment relationship will be terminated. If an applicant is denied employment because of a criminal record check, Goodwin Living will provide the applicant with a copy of the information obtained through the criminal record check.

Employee Health Review

It is the policy of Goodwin Living that all team members be screened using a questionnaire for tuberculosis upon hire. In addition to completing the screening by the Employee Health Nurse, or designee, all team

members working in clinical capacity and/or on the HCC, AL, Hospice, Rehab or with Home Health, and any other department where it is required, must receive a Quantiferon®-TB Gold Plus blood test (hereafter referred to as 'TB blood test') or chest x-ray if the team member has a positive history of tuberculosis and/or has a positive response to the blood test.

All team members will complete a tuberculosis screening questionnaire form and education upon hire and thereafter (1) on an annual basis, (2) when an exposure occurs and (3) if a team member has been out of the country for 30 or more days, as recommended by the Centers for Disease Control (CDC) best practice for preventing the transmission of mycobacterium tuberculosis in health-care settings.

An employee hired through acquisition are required to comply with the policy as described above. If any GL preemployment testing requirements were not part of the original health screen and/or there is no viable documentation of such testing at the existing organization, it must be completed prior to employment.

All offers of employment are conditional upon completion and favorable outcomes of the health review prior to the commencement of employment. Failure of an applicant to submit to or complete the health review will be considered as a rejection of the offer of employment.

Annual health reviews are required for all employees and must be completed by the anniversary date of the previous review and notification will be sent to employees in advance. If a scheduling conflict occurs, team members may request an alternative date through the Employee Health Nurse. An employee who fails to complete their health review as assigned may be suspended without pay until their health review is complete. Prolonged failure to complete the health review will result in termination.

All pregnant team members are required to comply with the Centers for Disease Control Guidelines. The TB and X-ray examinations for pregnant team members require a doctor's order.

Orientation

Orientation of a new team member is a critical step in establishing a proper foundation for successful performance. Before starting work in the assigned department, team members must read and sign their job description among other required paperwork and participate in required training prior to assuming their role within the organization. All new team members must complete both days of orientation within 30 days of hire. In some cases, orientation may be conducted electronically through Relias if a team member is an off-cycle hire. If Relias is utilized, the new team member must still complete day one of orientation with the next scheduled orientation cycle as well. Exceptions may apply.

Dress Code - Appearance

As guests in the residents' home, team members must present a professional appearance at all times. Goodwin Living expects all team members to exercise appropriate judgment with regard to personal appearance, dress and grooming to be most effective in the performance of their work duties. The following

applies to all team members:

- Pierced jewelry is generally limited to earrings and small nose rings
- Dress should be professional: no denim (except on approved days and/or for specific occasions), leggings as pants, tank tops, shorts, sweatpants, low-cut blouses, crop tops, tight-fitting garments or other inappropriate articles of clothing
- All team members must wear Goodwin Living approved uniforms or suitable business attire. Clothes with printed logos, wording or advertisements are not allowed with the exception of Goodwin Living related and sponsored clothing
- Flip flop-style shoes are prohibited
- Team members must adhere to the shoe policy for their department/work area
- No yoga pants
- Tattoos may be required to be covered
- No perfume or cologne
- Minimal jewelry

Factors that management will consider when determining whether jewelry or tattoos pose a conflict with the employee's job or work environment include:

- Personal safety of self or others, or damage to company property
- Productivity, performance expectations, or required regulations
- Offensiveness to co-workers, residents, vendors or others in the workplace
- Corporate or societal norms.
- Complaints from co-workers, residents, vendors or others in the workplace

If management determines a team member's jewelry or tattoos present such a conflict, the team member will be encouraged to identify appropriate options, such as removal of excess or offensive jewelry, covering of tattoos, transfer to an alternative position, or other reasonable means to resolve the conflict.

An environment of mutual cooperation, respect, and fair and consistent treatment for all is Goodwin Living's goal. Nonetheless, Goodwin Living is legally responsible for ensuring that no team members are subject to harassment or a hostile work environment. As an initial step toward resolution of any complaint or offense under this policy, supervisors and managers will be responsible for explaining the policy and answering employee questions. If an agreeable solution cannot be reached at that stage, Human Resources will follow company procedures to resolve the issue.

Goodwin Living allows reasonable self-expression through personal appearance, unless it conflicts with a team member's ability to perform his/her/their job effectively or within a team member's specific work environment/department, or it is regarded as offensive or harassing towards others. Individual departments may have their own set of guidelines. In departments where uniforms are required, department guidelines

for those uniforms will be followed. If there are any questions regarding appropriate attire in the workplace, please contact your department manager or Human Resources.

Immigration

Goodwin Living will comply with the Immigration Reform and Control Act of 1986 (IRCA) and employ only those individuals authorized to work in the United States. In compliance with federal law, all persons hired will be required to verify identity and eligibility to work in the United States and to complete the required employment eligibility verification form within three (3) business days of hire. Goodwin Living participates in E-Verify and will provide the federal government with your Form I-9 information to confirm that you are authorized to work in the U.S.

Employment of Relatives or Significant Others

It is the goal of Goodwin Living to create an environment that is free of perceived or actual favoritism and conflicts of interest. This means that team members' relatives and significant others may be employed at Goodwin Living, but relatives and significant others may not work in direct reporting relationships to one another. No relatives or significant others of current team members will be hired by Goodwin Living if such hiring would create a supervisory relationship between a current team member and that relative or significant other.

For purposes of this policy, "relatives" are defined as the following persons (naturally, by adoption or through marriage): father, mother, father-in-law, mother-in-law, son, daughter, son-in-law, daughter-in-law, brother, sister, wife, husband, registered domestic partner, grandparent, grandchild, aunt, uncle, cousin, nephew, or niece. Should two team members in a reporting relationship become relatives or significant others during their employment at Goodwin Living, they must report it to the compliance officers of Goodwin Living and, if possible, we may transfer one or both of the team members if a supervisory relationship exists. If no such transfer can be made, one of the team members must either resign or be terminated by Goodwin Living.

Failure to disclose the existence of a relationship governed by this policy can lead to disciplinary action, up to and including termination.

Employment of Minors

Individuals under 16 years of age may be employed only when such employment complies with all federal and state laws regulating the employment of minors.

Serving Alcohol

Team members who are at least 18 years of age may serve alcoholic beverages. Only team members who are at least 21 years of age may prepare, mix or pour alcoholic beverages.

Employment Classification—Definitions

Full-time, Regular team members are regularly scheduled to work at least 30 hours per week. Full-time, regular team members are entitled to benefits as described in the benefits section of this Handbook and the Benefit Guidebook.

Part-time, Regular team members are regularly scheduled to work less than 30 hours per week.

PRN (on-call) team members work only on an as-needed basis.

Temporary team members are employees who are hired for a specific task or project and are generally scheduled to work less than 30 hours per week for a specified time and/or duration of task/project

Non-exempt team members are team members who are eligible for overtime under the federal Fair Labor Standards Act and/or applicable state wage/hour laws. Non-exempt employees are paid overtime in accordance with federal and state law.

Exempt team members are team members who are salaried and whose work duties exempt them from the overtime provisions of the federal Fair Labor Standards Act and any applicable state wage/hour laws. Exempt team members receive a salary which is intended to compensate them for all hours worked.

Team members will be told what their employment classification is at the time of hire. Any change in classification after hire will only be effective upon receipt of a written confirmation from Human Resources of the change in classification.

Reference Requests for Current and Former Team Members

If team members require a professional reference from Goodwin Living, a request must be submitted verbally or in writing. In general, Goodwin Living only releases dates of employment and positions held. Any supervisor or department director who receives a request for a reference from a current or former team member must refer that request to Human Resources. No team members outside of Human Resources are permitted to provide professional references on behalf of current or former team members.

Any team member requesting employment verification must provide written authorization for the release of information.

LEAVE POLICIES

Providing round-the-clock care for individuals is a privilege and an honor, but one that brings with it serious responsibilities. Therefore, Goodwin Living believes team members should take time away from work to rest, reflect, spend time with family and friends, and tend to personal matters.

Team members are requested to schedule medical appointments at the beginning or end of their shifts to minimize time away from work. If time remains in the workday, team members are expected to report or return to work following their appointments.

To take advantage of paid leave, team members must follow department-specific policies. Authorization for such leave is subject to the discretion of the department director and is contingent upon the department’s staffing needs.

For periods of leave without pay, paid time off will not accrue.

Paid Time Off (PTO)

Subject to supervisor’s approval, regular full-time and part-time team members meeting the criteria, may use accrued PTO. Team members who leave Goodwin Living prior to three months of employment forgo any accrued PTO.

The PTO accrual rate is based on years of service and scheduled work hours. The table below shows the annualized accrual for non-exempt team members who are regularly scheduled to work 75 hours per pay period and for exempt team members who are regularly scheduled to work 80 hours per pay period. Team members’ accrual rates increase on their anniversary dates, to maxim of 30 days, as shown below.

Years of Service	Number of Days Accrued in a Year		Years of Service	Number of Days Accrued in a Year
Less than or equal to one year of service	15		9-10	24
1-2	16		10-11	25
2-3	17		11-12	26
3-4	18		12-13	27
4-5	19		13-14	28
5-6	20		14-15	29
6-7	21		15 plus	30
7-8	22			
8-9	23			

PTO balances may be carried over from one fiscal year to the next, to a maximum of five weeks of accrued PTO. Team members stop accruing PTO hours once the maximum accrual is reached.

PTO and Leave Without Pay

Team members may not use leave without pay when PTO is available for use, unless team members are on approved FMLA leave. Leave without pay may be approved by a supervisor under very limited circumstances.

Leave Donation Policy

The Goodwin Living mission is to “support, honor and uplift the lives of older adults and the people who care for them...” The Goodwin Living Shared Leave Bank (SLB) and related leave sharing policy was developed to reduce the hardship that team members experience when Paid Time Off (PTO) is exhausted and unpaid leave is required to (1) care for a sick family member (child or spouse) with a prolonged illness, (2) respond to the death of a spouse or child, or (3) respond to a natural or personal disaster. This policy does not apply to routine and/or short-term medical conditions (in general, short-term medical conditions are illnesses not covered by the Family and Medical Leave Act). The maximum amount any one team member can receive under this policy is 12 weeks per rolling 12-month period (this time period begins on the first day a team member needs to be out due to one of the three items referenced above).

The Shared Leave Bank is a voluntary, confidential program that allows team members to donate accrued PTO hours to co-workers in need. This policy covers team members (1) with a spouse and/or child experiencing a medical emergency that qualifies under the Family and Medical Leave Act (please see the Family and Medical Leave Act policy and procedure located in the Employee Handbook for full details), (2) responding to the death of a family member, and/or (3) responding to a natural or personal disaster, may request funds from the Shared Leave Bank (SLB) after he/she has exhausted all available PTO and his/her sick leave bank, if applicable. This policy provides an opportunity for team members to provide monetary support to co-workers in need. Team members may not designate PTO hours to a specific co-worker. All donated leave goes into the Shared Leave Bank.

This policy does not cover a team member who needs to be out due to a personal illness. Paid time off, optional short-term disability and long-term disability are designed to help team members through short and long-term personal illnesses.

Eligibility

Full-time team members who have been employed by Goodwin Living for a minimum of one-year and are in good standing (no written warnings within the past six months and no more than two written warnings within the past 18 months) are eligible to apply for assistance from the SLB.

Definitions

Medical Emergency: Under IRS Revenue Ruling 90-29, a medical emergency is defined as “a medical condition of a family member that will require the prolonged absence of the team member from duty and will result in a substantial loss of income to the team member because they will have exhausted all paid leave available apart from the leave-sharing plan.”

Family Member: Spouse and child.

Natural Disaster: under IRS Notice 2006-59 a major disaster is “declared by the President under §401 of the Stafford Act that warrants individual assistance or individual and public assistance from the federal government” or 2) “a major disaster or emergency as declared by the President pursuant to 5 U.S.C., Section 6391.”

Personal Disaster: Team members who experience severe damage to their primary residence that requires immediate attention.

Please see HR for full details and to donate or request donated leave.

Meal Breaks

Non-exempt (hourly) team members who are scheduled to work a minimum of six hours are entitled to a 30-minute meal break. If unable to take the 30-minute meal break, the team member **MUST** submit a *Time Clock Changes* form to his/her department director or designee. Missing a meal period should be the exception and must be approved in advance by the department director or designee. This form must be completed each time a meal break is missed or lasts less than 30-minutes. The form is available in all departments, in Human Resources, or on the S: drive on the GL Network. Since Goodwin Living deducts 30-minutes for the meal period, we want to be sure that we compensate team members in the event that a meal period is missed. This 30-minute break is a time to relax and enjoy a meal during the workday.

When dining at Goodwin Living, the meal period is automatically deducted after six hours. All non-exempt team members must clock out prior to leaving the building and clock back in upon return to the building. Taking extended break periods without supervisory approval and without clocking out is prohibited and may result in termination.

Holidays

Full-time, regular team members are entitled to the following paid holidays:

- New Year 's Day
- Martin Luther King Jr. Day
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day
- Christmas Day

For full-time Team Members who are not typically scheduled to work weekends, if one of these holidays falls on a Saturday, it will be observed on the preceding Friday. If the holiday falls on a Sunday, it will be observed on the following Monday.

In addition, each fiscal year (October 1 – September 30), all regular full-time team members who have completed a least three months of full-time employment are entitled to one paid “personal day” and one “floating holiday.” As with all leave, approval remains at the manager's discretion, and we encourage each team members to provide as much notice as possible.

Team Members may request to take an alternative paid day off rather than Christmas Day, but prior approval is required. A leave request form must be given to your supervisor for approval.

To be eligible for any holiday pay, you must work your scheduled workday before and your scheduled workday after a holiday. Failure to do so may result in loss of holiday pay.

For non-exempt full-time team members, holiday pay will be calculated based on the usual number of hours worked at the regular rate of pay, to a maximum number of 8 hours. Non-exempt full-time team members who work on one of the seven holidays specified above will be paid at a rate of two (2) times their regular rate of pay for hours worked on the specified holiday. The maximum pay for all team members is 8 hours; this amount is prorated based on scheduled hours.

Non-exempt part-time and *PRN Team Members who work on one of these holidays specified above will be paid at a rate of one and one-half (1.5) times their regular rate of pay for hours worked on the specified holiday, to a maximum of 8 hours; this amount is prorated based on scheduled hours.

*PRN Rehabilitation and Home Health team members are not eligible for additional pay.

If an exempt Team Member is required to work on one of the seven holidays specified above, the department director may authorize time off with pay later. Such time off will be scheduled at the mutual convenience of Goodwin Living and the team member.

Severe Weather

Our residents, members, and patients need our care every day, and all Goodwin Living team members must report to work during severe weather. We will make every effort to provide accommodation within our facilities to help team members avoid dangerous travel and stay safe. Each department has its own policy related to attendance during severe weather that must be adhered to. Please see your department director for complete details.

Bereavement Leave

Goodwin Living recognizes that a death in the family is difficult for team members, and we will make every effort to ensure that team members are able to tend to family matters during this period.

Regular full-time team members are given three days of paid leave for an absence due to the death of a non-immediate family member. Regular full-time team members will be given up to five days paid leave for absences due to the death of an immediate family member as described below.

“Immediate family” (up to five days of leave) includes mother, father, sister, brother, spouse, domestic partner, children (including step-children), or an individual who took the place of parents during childhood.

“Non-immediate family” (up to three days of leave) includes grandchildren, grandparents and corresponding in-laws to immediate family listed above.

Should a team member require additional time off, for example, because the funeral is located outside of the local area, the team member may use available PTO or may be granted reasonable time off without pay, depending on business needs and up to manager discretion.

Team members on vacation or a leave of absence are not entitled to bereavement leave. Goodwin Living may require verification of death.

Jury Duty and Court Appearances

A team member may receive up to \$75 per day for a maximum of five days when selected for Jury Duty. If a team member chooses, he or she may use accrued PTO for a jury duty absence, however, he or she is not required to do so. A copy of the summons is required for payment. For exempt team members, leave will be unpaid if permissible under federal and state laws.

Any team member who appears for jury duty for four or more hours, including travel time, in one day, will not be required to start any work shift that begins at or after 5:00 p.m. on the day of his or her appearance for jury duty, or begins before 3:00 a.m. on the day following the day of his appearance for jury duty.

Leave for Court Appearances

When a team member receives a subpoena or summons to appear in court, Goodwin Living will grant a leave of absence from work, as long as the team member provides reasonable notice. This policy does not apply to a defendant in a criminal case.

If an employee chooses, he or she may use accrued paid leave in order to receive compensation for a court appearance-related absence. If team members choose not to use their paid leave, any court attendance time will be unpaid for nonexempt team members. For exempt team members, leave will be unpaid if permissible under federal and state laws.

Leave for Crime Victims

When a team member has been identified by law enforcement authorities as a “victim” of a crime, Goodwin Living will grant a leave of absence from work to permit the team member to attend criminal proceedings relating to the crime, unless the leave will create an undue hardship on operations.

For purposes of this policy, a “crime” means a felony or assault, stalking, sexual battery, maiming, or DUI. A “victim” may include not only the specific individual who has suffered harm as the result of a crime, but also that person’s spouse or child, parent or legal guardian (where the victim is a minor), and spouse, parent, sibling or legal guardian, where the victim is incapacitated or deceased.

“Criminal proceeding” applies not only to a criminal trial, but to other judicial proceedings, such as the initial appearance of the suspect, any proceeding in which a negotiated plea is presented to the court, any sentencing proceeding, and all proceedings relating to probation.

A team member taking leave under this policy must provide Goodwin Living with a copy of a form which the victim receives from police after being identified as the victim of a crime, and a copy of notices the team member receives of each scheduled criminal proceeding. Leave under this policy is unpaid for non-exempt team members. For exempt team members, leave will be unpaid as permissible under federal and state laws.

Leave for Election Officials

Team members may take unpaid leave to serve as an officer of election. An officer of election means a person appointed by an electoral board to serve at a polling place for any election. Team members must provide reasonable notice of such service.

Goodwin Living will not discharge or take any adverse action against team members for taking election officer leave, nor will team members be required to use PTO, as a result of such absences, as long as the team members provide reasonable notice of their need for leave.

Election officers who serve for four or more hours on Election Day, including travel time, will not be

required to start any work shift that begins on or after 5:00 p.m. on the day of service or before 3:00 a.m. on the day after service.

Military Leave

If you are called to active duty in the U.S. military National Guard or Reserves, you are eligible for unpaid military leave in accordance with state and federal law. You may also use any available PTO for this purpose. Present your supervisor with a copy of your service papers as soon as you receive them.

During your absence, your length of service accumulates, and your benefits will continue as required by applicable law. Upon application within the appropriate time period after your date of discharge from military service, you will receive the then-current rate of pay and then-current benefits.

If you are required to attend yearly Reserves or National Guard duty, you may apply for an unpaid temporary military leave of absence. However, if you prefer, you may use any available PTO for this purpose. You should give your supervisor as much advance notice as possible so that we can ensure proper coverage while you are away.

FAMILY AND MEDICAL LEAVE ACT (FMLA)

Basic Leave Entitlement

FMLA requires covered employers to provide up to 12 weeks of unpaid, job-protected leave to eligible team members during a rolling 12-month period for the following reasons:

- For incapacity due to pregnancy, prenatal medical care or childbirth;
- To care for the team member's child after birth, or after placement for adoption or foster care;
- To care for the team member's spouse, son or daughter, or parent who has a serious health condition; or
- For a serious health condition that makes the team member unable to perform their job.

Leave to care for the team member's child after birth, or placement for adoption or foster care must be taken within one year of the child's birth or placement.

Military Family Leave Entitlements

Eligible team members with a spouse, son, daughter or parent on covered active duty or call to covered active-duty status in the Reserve component of the Armed Forces for deployment to a foreign country in support of a contingency operation or Regular Armed Forces for deployment to a foreign country may use their 12-week leave entitlement to address certain qualifying exigencies. Qualifying exigencies may include attending certain military events, arranging for alternative childcare, addressing certain financial and legal arrangements, attending certain counseling sessions, caring for the parents of the military

member on covered active duty and attending post-deployment reintegration briefings.

FMLA also includes leave entitlement that permits eligible team members to take up to 26 weeks of leave to care for a covered service member during a single 12-month period. A “covered service member” is a current member of the Armed Forces, including a member of the National Guard or Reserve, who is undergoing medical treatment, recuperation, or therapy, is otherwise in outpatient status or is on the temporary retired list for a serious illness. A covered service member is a current member of the Armed Forces, including a member of the National Guard or Reserves, who is undergoing medical treatment, recuperation, or therapy, is otherwise in outpatient status, or is on the temporary retired list, for a serious injury or illness.

These individuals are referred to in this policy as “current members of the Armed Forces.” Covered service members also include a veteran who was discharged or released from military service under a condition other than dishonorable at any time during the five (5) year period prior to the first date the eligible team member takes FMLA leave to care for the covered veteran, and who is undergoing medical treatment, recuperation or therapy for a serious injury or illness.

These individuals are referred to in this policy as “covered veterans.” The FMLA definitions of a “serious injury or illness” for a current Armed Forces member and covered veterans are distinct from the FMLA definition of a “serious health condition” applicable to FMLA leave to care for a covered family member.

Benefits and Protections

During FMLA leave, the employer must maintain the team member’s health coverage under any “group health plan” on the same terms as if the team member had continued to work. Upon return from FMLA leave, most team members must be restored to their original or equivalent positions with equivalent pay, benefits, and other employment terms.

Use of FMLA leave cannot result in the loss of any employment benefit that accrued prior to the start of a team member’s leave.

Eligibility Requirements

Team members are eligible if they have worked for a covered employer for at least one year and for at least 1,250 hours over the previous 12 months, and if at least 50 team members are employed by the employer within 75 miles of the team member’s worksite.

Definition of Serious Health Condition

A serious health condition is an illness, injury, impairment, or physical or mental condition that involves either an overnight stay in a medical care facility, or continuing treatment by a health care provider for a condition that either prevents the team member from performing the functions of their job, or prevents the qualified family member from participating in school or other daily activities.

Subject to certain conditions, the continuing treatment requirement may be met by a period of incapacity of more than three (3) consecutive calendar days combined with at least two visits to a health care provider or one visit and a regimen of continuing treatment, or incapacity due to pregnancy, or incapacity due to a chronic condition. Other conditions may meet the definition of continuing treatment.

Use of Leave

A team member does not need to use this leave entitlement in one block. Leave may be taken intermittently or on a reduced leave schedule when medically necessary. Team members must make reasonable efforts to schedule leave for planned medical treatment so as not to unduly disrupt operations. Leave due to qualifying requirements may also be taken on an intermittent basis.

Substitution of Paid Leave for Unpaid Leave

Goodwin Living does not require team members to utilize accrued PTO while taking approved FMLA leave. The accrual policy for full-time team members who are on a leave status (FMLA or other approved leave) is the same as if a team member is on active status. To accrue PTO while on leave, a minimum of 60 hours of PTO, sick bank, holiday, or regular hours must be applied each pay period (short-term disability does not count toward PTO accrual).

Team Member Responsibilities

Team members must provide 30-days advance notice of the need to take FMLA leave when the need is foreseeable. When 30-days' notice is not possible, the employee must provide notice as soon as practicable and generally must comply with a Goodwin Living's normal call-out procedures.

Team members must provide sufficient information for Goodwin Living to determine if the leave may qualify for FMLA protection and the anticipated timing and duration of the leave. Sufficient information may include that the team member is unable to perform job functions, the family member is unable to perform daily activities, the need for hospitalization or continuing treatment by a health care provider, or circumstances supporting the need for military family leave. Team members also must inform Goodwin Living if the requested leave is for a reason for which FMLA leave was previously taken or certified. Team members also may be required to provide a certification and periodic recertification supporting the need for leave.

Employer's Responsibilities

Covered employers must inform team members requesting leave whether they are eligible under FMLA. If they are, the notice must specify any additional information required as well as the team members' rights and responsibilities. If they are not eligible, the employer must provide a reason for ineligibility. Covered employers must inform team members if leave will be designated as FMLA-protected and the amount of leave counted against the employee's leave entitlement. If the employer determines that the leave is not FMLA-protected, the employer must notify the employee.

Unlawful Acts by Employers

FMLA makes it unlawful for any employer to:

Interfere with, restrain or deny the exercise of any right provided under FMLA; discharge or discriminate against any person for opposing any practice made unlawful by FMLA or for involvement in any proceeding under or relating to FMLA.

Concerns regarding a possible violation with respect to either of these obligations should be reported to the Human Resources.

Enforcement

An employee may file a complaint with the U.S. Department of Labor or may bring a private lawsuit against an employer.

FMLA does not affect any federal or state law prohibiting discrimination or supersede any state or local law or collective bargaining agreement which provides greater family or medical leave rights.

TRAINING AND DEVELOPMENT

Tuition Assistance for Career Development — Credit and Vocational Classes

An important part of career development at Goodwin Living is the continuation of formal education. We support and encourage such activities through the Tuition Assistance Program. This program:

- provides educational opportunities to team members, regardless of department or position;
- assists team members in achieving educational goals; and
- prepares team members for additional responsibilities in new, more challenging and/or higher-level positions.

How Does It Work?

Tuition assistance is available for all full-time and part-time team members who meet eligibility requirements.

Eligibility Requirements for Tuition Assistance

- Generally, applicants must be full-time or part-time team members having worked a minimum of six months with Goodwin Living (certain exceptions apply). Goodwin Living in its sole discretion may waive this requirement.

How to Apply for Tuition Assistance

- Complete the Tuition Assistance Application online by going to www.worforcenow.adp.com

In-service Education

In-service education is an important part of your professional and personal growth at Goodwin Living. Moreover, the Virginia Department of Health and the Virginia Department of Social Services require specific in-service education for team members of all licensed facilities on an annual basis. This means that all team members must participate in required in-service programs.

Required Training

Team members who fail to complete their required annual training will not receive their merit increase until required training is completed.

BENEFITS – Please see Benefit Guidebook for Detailed Information (located on the ADP home page)

SALARY ADMINISTRATION

Pay Day

For payroll purposes, the workweek starts on 12:01 a.m. Thursday and ends at midnight on Wednesday. Time for shifts beginning at 11:00 p.m. or later Wednesday will be entered the following pay period.

All team members will be paid every other Wednesday after 1:00 p.m. via direct deposit or a pay card, with exception of the first paycheck.

Paystubs are viewable and/or printable on ADP.

When a payday falls on a holiday, paychecks will be distributed the day before the holiday. If you believe there is an error in your pay, bring the matter to the attention of your department director or payroll coordinator immediately.

Exempt Team Members

Exempt/salaried team members receive a salary which is intended to compensate for all hours worked. This salary will be established at the time of hire. While it may be subject to review and modification from time to time, such as during salary review times, the salary will be a predetermined amount that will not be subject to deductions for variations in the quantity or quality of the work you perform.

Under federal and state law, your salary is subject to certain deductions. For example, absent contrary state

law requirements, your salary can be reduced for the following reasons:

- Full day absences for personal reasons.
- Full day absences for sickness or disability.
- Full day disciplinary suspensions for infractions of policies and procedures.
- To offset amounts received as payment for jury duty and witness fees or military pay.
- The first or last week of employment in the event you work less than a full week.
- To account for time missed due to FMLA leave.

Your salary may also be reduced for certain types of deductions such as your portion of health, dental or life insurance premiums; state, federal or local taxes, Social Security; or voluntary contributions to a 401(k) plan.

In any work week in which you performed any work, your salary will not be reduced for any of the following reasons:

- Partial day absences for personal reasons, sickness or disability.
- Your absence on the day before or after a paid holiday or because the facility is closed on a scheduled workday.
- Absences for jury duty, attendance as a witness, or military leave in any week in which you have performed any work.
- Any other deductions prohibited by state or federal law.

However, it is not an improper deduction to use an employee's accrued PTO, personal or other forms of paid time off for full or partial day absences for personal reasons, sickness or disability.

If you believe you have been subject to any improper deductions, you should immediately report the matter to your department director or Human Resources.

Deductions from Pay

Goodwin Living is required by law to make certain deductions from your paycheck. Your pay stub itemizes the deductions made from your gross earnings.

The following deductions may be made from a team member's pay where required and/or applicable:

- Federal and state withholding taxes;
- Social Security taxes;
- Medicare taxes;
- Team member contributions to group insurance (individual or for dependents) if the team member elects this coverage;

- Any other deductions as required or agreed upon (including, but not limited to, section 125 Flexible Spending accounts, optional life insurance, optional vision insurance, 401(k), loan repayments, garnishments and tax levies).

*Group Term Life (GTL) -- IRC section 79 provides an exclusion for the first \$50,000 of group-term life insurance coverage provided under a policy carried directly or indirectly by an employer. There are no tax consequences if the total amount of such policies does not exceed \$50,000. The imputed cost of coverage in excess of \$50,000 must be included in income, using the IRS Premium Table, and are subject to Social Security and Medicare taxes.

Any questions you may have about your paycheck, or the deductions made should be addressed to the Payroll Department or Human Resources.

Timecards

All non-exempt team members are issued cards with a magnetic bar code on the back. These are to be swiped through the time clock whenever clocking-in or out. All time is recorded in 15-minute intervals. Non-exempt team members are responsible for bringing their badges to work for clocking in and out when entering or leaving the building. Clocking-in or clocking-out for another team member is prohibited.

Team members may not “punch/sign-in” **more than seven (7) minutes** prior to the start of their shift without a supervisor’s approval. Team members may not “punch/sign-out” more than **seven (7) minutes beyond** their scheduled hours without prior approval from a supervisor. One replacement card is issued free of charge if the original is lost or damaged by negligence.

Working off the Clock

Non-exempt team members who clock-in and out are not permitted to work when not clocked-in. **NO EXCEPTIONS.**

Overtime

Overtime is allowed only when pre-approved by a department director or designated supervisor. All non-exempt team members are paid time-and-a-half for hours worked in excess of 40 hours in one work week, which begins at 12:01 a.m. Thursday and ends at 12:00 midnight the following Wednesday. PTO, holidays, and other paid leave time is not considered hours worked for purposes of calculating overtime.

Team Member Support Grants and Emergency Loans

Please see the ADP Homepage (or click the link below) for detailed information and applications for both loans and grants. Loans will not be granted if the repayment schedule reduces your hourly income to less than the minimum wage rate.

<https://workforcenow.adp.com/static/clients/content/GLF-Staff-Support-Fund-Application-FY22.pdf?1675778116600>

SAFETY AND SECURITY

Confidentiality

All records (for example, personnel, resident records, and medical records) are the property of Goodwin Living and are to be used for authorized purposes only by management and team members having access to said records. Information obtained from records is to be treated as confidential and should not be discussed except as required in the performance of your job duties.

Communication, Telephone Use, and Recording

Incoming Calls

All team members are requested to provide family, babysitters, schools, and repair persons with the correct telephone number for their departments. When emergency calls come in, team members are alerted by their department directors or supervisors. Team members are given a message for any other calls. Team members may return all non-emergency calls during their break or mealtimes. Unnecessary calls are discouraged.

Personal Cell Phone Use

Personal cell phones are **not to be used during working hours** without prior authorization from your supervisor. If granted permission to carry a cell phone, all conversations should take place in a non-public area, away from the residents (for example, not in a resident dining room or resident living areas).

Company Issued Cell Phones

Team members issued cell phones for work related reasons must follow the established cell phone policy. Each team member who falls into this category will be provided with a copy of the cell phone policy and is required to adhere to it.

Electronic Devices

Team members are prohibited from wearing or using earphones, iPods, and all other forms of electronic communication devices unless specifically instructed to do so by a supervisor for business purposes.

Use of Employer-Issued Cell Phones and Other Hand-Held Devices While Driving

Team members are encouraged to pull off to the side of the road if they need to use a cell phone while

driving. If this option is simply not feasible, the call is to be kept short and a hands-free option must be used.

At no time is a team member permitted to use a Goodwin Living-issued phone or other similar devices to email or send a text message while driving.

Team members who are charged with a traffic violation due to cell phone usage while driving are responsible for all fines and liability associated with the occurrence.

Camera Phones/Recording Devices

Due to confidentiality concerns, HIPAA issues and privacy interests, the use of recording devices anywhere on Goodwin Living property, members' and residents' and patients' rooms/home/apartments is prohibited. Employees are prohibited from making audio or visual recordings of another Goodwin Living employee or of a resident or visitor. This prohibition shall not apply to recordings that are permitted under the National Labor Relations Act.

Team members may not use recording devices during working time. The only exceptions to this policy are instances when a recording device is provided to a team member by Goodwin Living for a specific business purpose and is used solely for that pre-approved legitimate business purpose. Violations of this policy may result in immediate discipline, up to and including, termination of employment.

"Recording devices" under this policy include, but are not limited to, cameras, camcorders, video devices, picture or video capable cellular telephones or smart phones, tablets, cassette recorders and digital voice or image recorders. Cellular telephones, PDAs, MP3 and DVD devices, portable computers, and other devices are covered if they are equipped with any device or technology that has the capability to record images or sounds.

Work Areas

Team members are assigned to designated work areas to ensure optimal care for and the safety of our residents. If we work as a team, with each of us performing our individual duties to the best of our abilities when and where expected, Goodwin Living will continue to deliver top-quality service and be an enjoyable and rewarding place to work. During working time team members are expected to remain in work areas designated by their department directors or supervisors unless there is valid reason and permission to be elsewhere

Building Security

For everyone's safety and security, all team members must follow facility procedures when entering and exiting our buildings. At no time should doors be propped open or tampered with in any way, for example, to alter any locking mechanism, unless so directed by a supervisor.

Goodwin Living may find it necessary to monitor work areas with security cameras when there is a specific job- or business-related reason to do so. The company will do so only after first ensuring that such action follows state and federal laws.

Employees should not have any expectation of privacy in work-related areas. Security cameras are placed throughout each community for the safety of residents, guests, and team members.

Searches of Company and Team Member Property

Because of our concern for the security of our residents and team members, to protect Goodwin Living from theft, and to enforce Goodwin Living policies prohibiting other misconduct, including the possession or use of drugs, alcohol, and weapons, Goodwin Living reserves the right to search team members and their personal property, including vehicles, clothing, packages, purses, bags, lunch boxes, and other containers brought onto Goodwin Living premises, when there is reason to believe the Goodwin Living policy is being violated. Team members are expected to cooperate in the conduct of such searches.

Goodwin Living provides property to team members for their use including company vehicles, desks, file cabinets and lockers. Searches of Goodwin Living facilities and property, including Goodwin Living property in the possession of the team member, may be conducted at any time and do not have to be based upon reason to believe Goodwin Living policy is being violated. Team members may not withhold permission for Goodwin Living to search property that it has supplied for team member use.

Parking

Parking is provided free of charge to all team members. All parking regulations must be adhered to and will be strictly enforced. Team members may park only in spaces designated for team members' use and **never** in a spot marked "Resident". Team members committing parking violations may be subject to discipline, including the loss of parking privileges and/or towing or booting, depending on where the car is parked.

Parking policies and procedures may differ between location and team members are required to comply with the policies and procedures when parked at each community.

Off-duty Employees

Team members are permitted in Goodwin Living work areas only during their scheduled working hours or with administrative approval.

Former team members are allowed on Goodwin Living property when they have a legitimate reason for visiting and are not permitted on Goodwin Living's premises without prior authorization. Team members who were terminated from their employment from Goodwin Living may not return to the premises without prior authorization from Human Resources.

Transfer of Property between Residents and Employees

To ensure uniformity of service by team members to all residents, no individual tips, gratuities, or loans of money may be accepted from residents or their families. Should a resident offer to tip you, simply express your gratitude and then immediately inform the resident that it is against Goodwin Living policy to accept such gifts.

Theft

Theft or unauthorized removal of property belonging to Goodwin Living, a resident, a team member or a visitor will not be tolerated. Any team member involved in such an act will be subject to discipline, including immediate termination of employment and the police may be notified.

Drug-Free and Alcohol-Free Workplace

Basis of the Policy

Goodwin Living is committed to protecting the safety, health and well-being of its team members, residents and all people who come into contact with its team members, workplaces, and property, and/or use its services. Goodwin Living recognizes that drug and alcohol abuse pose a direct and significant threat to this goal, and to the goal of a productive and efficient working environment in which all team members have an opportunity to reach their full potential. Goodwin Living therefore is committed to ensuring a substance-abuse-free working environment for all of its team members and underscores that commitment through implementation and enforcement of this Drug-Free and Alcohol-Free Workplace Policy (“Policy”).

Scope and Applicability

This Policy applies to all team members, including all management team members, and – as appropriate and relevant – to all job applicants.

Drug and Alcohol Prohibitions

(A) Drug Abuse

Goodwin Living strictly prohibits the possession, use, sale, attempted sale, purchase, attempted purchase, conveyance, distribution, transfer, dispensation, cultivation, and/or manufacture of illicit drugs or other intoxicants at any time, and in any amount or any manner – as well as the abuse/misuse of alcohol and prescription drugs.

“Illicit drugs” includes all drugs, narcotics and intoxicants for which possession or misuse is illegal under federal law and includes prescription medications for which the individual does not have a

valid prescription. The deliberate use of prescription medications and/or over-the-counter drugs in a manner inconsistent with dosing directions, and in a manner which may result in impairment, is considered illicit drug use. In addition, the use of chemical intoxicants for other than a legitimate and therapeutic purpose is considered illicit drug use.

(B) Alcohol Abuse and Misuse

Goodwin Living recognizes the enormity and severity of the alcohol-abuse problem in American society and in American workplaces. Goodwin Living therefore prohibits the abuse, misuse, or possession of alcohol while working, present on Goodwin Living's premises (defined as all buildings, facilities, and property – including parking areas – owned or leased by Goodwin Living, and all places where Goodwin Living conducts business, including client facilities), or representing Goodwin Living at any time and in any way.

Goodwin Living also prohibits the use of alcohol, or the possession of opened containers of alcohol, by team members operating Goodwin Living provided vehicles, or operating any other vehicle while on Goodwin Living business. Moreover, the use or abuse of alcohol off-the-job which could impair, to any extent, performance on-the-job, will be considered a violation of this Policy.

Under limited conditions, Goodwin Living's executives may occasionally authorize alcoholic beverages at approved Goodwin Living functions at designated sites. In those situations, a team member may consume a moderate amount of alcohol, provided that the team member's conduct and demeanor remain business-like and professional at all times, and provided further that the team member does not thereafter drive or otherwise engage in any activity which could be hazardous if the alcohol consumed impaired or affected the team member's ability to perform those activities, and does not otherwise engage in conduct which would reflect detrimentally on Goodwin Living.

(C) Use of Prescription Medications

Team members who use prescription and/or over-the-counter medications – that the team member or his or her health-care provider believes may impair the team member's ability to perform his or her job responsibilities safely – are responsible for notifying their immediate supervisor or the Human Resources Department so that steps can be taken to minimize the safety risks posed by such use. Team members may be asked to obtain a doctor's certification that the team member can safely perform the responsibilities of his or her position. Any information Goodwin Living may learn about a team member's health or medicines will be treated as confidential and will be shared with other Goodwin Living team members only on a need-to-know basis.

Discipline

Team members in violation of this Policy will be subject to disciplinary action, up to and including termination, including for a first offense. Team members who are drug tested, and whose drug tests are confirmed positive, will have their employment with Goodwin Living terminated. In circumstances which warrant it, Goodwin Living also will notify law enforcement, and will fully

cooperate with any resulting investigation and prosecution.

Employee Assistance

Goodwin Living strongly encourages team members who believe that they have a problem with alcohol or drugs – legal or illegal – to seek assistance *before* a violation of this Policy is found. For those team members who self-identify a substance-abuse problem to Goodwin Living, sources of help may be provided. The team member would be referred for a medical assessment, possible counseling and rehabilitation, and possible re-testing during and after rehabilitation, and would, at Goodwin Living's sole discretion – be subject to continued employment.

Drug and Alcohol Testing

Team members may be subject to drug and/or alcohol testing as a condition of continued employment as directed by Goodwin Living, at its sole discretion. This includes, but is not limited to, drug and/or alcohol testing: (1) on a for-cause basis; (2) as part of a post-incident investigation; (3) during and post-rehabilitation, including return-to-duty testing; (4) as otherwise deemed necessary and appropriate by Goodwin Living.

A team member's refusal to submit to testing; failure to fully cooperate in the testing process; attempt to tamper with, substitute for, adulterate, dilute, or otherwise falsify a test sample; and/or any other conduct which would intentionally prevent or compromise a valid test result will be considered insubordination and will result in termination of employment.

Consequences of a Positive Test

Any team member whose drug test is positive will be in violation of this Policy and *will* have his or her employment terminated. An employee whose alcohol test is positive will be considered to be in violation of this Policy, and will be subject to adverse employment action, up to and including termination of employment.

Notification of Conviction

Consistent with the requirements of the Drug-Free Workplace Act of 1988, Goodwin Living's team members working on federal government contracts must notify the Human Resources Department of any criminal drug statute conviction for a violation occurring in the workplace no later than five days after such conviction.

Searches

When Goodwin Living has any reason to believe that a team member is violating any aspect of this Policy, he or she may be asked by Goodwin Living to submit immediately to a search or

inspection. Such a search or inspection can be required at any time (including during breaks and meal periods) while on Goodwin Living premises, representing Goodwin Living.

This includes a search of a team member's person and/or the requirement that the team member make his or her desk, workstation, storage locker, briefcase, purse, pockets, wallet, personal belongings, vehicles, accommodations, and/or any other property that he or she uses, has access to, and/or has control of, available for inspection.

Any property provided by Goodwin Living, or its customers, to a team member is provided with only a temporary license of use and/or access, and then only relative to the appropriate performance of the team member's work responsibilities. Such license is specifically subject to the condition that the team member must, on request, grant access to the property for inspection and search. Goodwin Living reserves and retains the right to remove any lock or other device securing the property, as necessary and/or appropriate.

Entry into Goodwin Living's premises constitutes a consent to searches and inspections.

A team member's refusal to consent to a search or inspection when requested by Goodwin Living constitutes a violation of this Policy and – as with other violations of this Policy – is grounds for adverse employment action, up to and including termination of employment.

General Responsibility

Substance-abuse prevention is everyone's responsibility. Goodwin Living expects all team members to recognize and accept this responsibility, and to do their part in assuring that – working together – we can achieve and maintain a substance-abuse-free working environment for all Goodwin Living team members.

Smoking in the Workplace

Goodwin Living is a "Smoke Free Workplace," which means that smoking by team members is prohibited on Goodwin Living grounds. Team members who use their meal break time to smoke must clock-out prior to leaving the building and clock back in upon return. Team members are not permitted to smoke anywhere on the property including personal vehicles.

Hazard Communication Standards

We provide hazard information to our team members through accurate, up-to-date Material Safety Data Sheets (MSDS) available in each department, on labels on containers, and in training appropriate to each team member's level of risk. The overall objective of the Hazard Communication Standard is to ensure that Goodwin Living and its team members are aware of the chemical hazards that exist in their workplace and know how to protect themselves from injury. The Hazard Communication Standard provides workers with the right to know which chemicals they may encounter in the workplace and what hazards these particular

chemicals may pose to their health and safety. The MSDS shall be obtained, reviewed and revised when necessary for each hazardous chemical used in our facilities, and employees shall be made aware of their availability at new team member orientation and at departmental meetings.

Motor Vehicle Safety

To ensure the safe operation of Goodwin Living vehicles, personally owned vehicles used for Goodwin Living business and vehicles rented at Goodwin Living expense, drivers shall at all times comply with all traffic laws, use seat belts and shoulder harnesses at all times, and report all tickets, citations, accidents and moving violations to Human Resources within 12 hours or the next business day.

Information Technology User Policy

Authorized team members have access to the Goodwin Living information technology network and the Internet. Team members are responsible for the legal and ethical use of the network and the Internet. Care must be taken to ensure that accessing the network and the Internet does not jeopardize the interests of Goodwin Living and our residents.

The Goodwin Living network primarily is for the purpose of conducting official Goodwin Living business. Limited personal use of Goodwin Living's network and access to the Internet is allowed on a team member's own time and is not to interfere with the team member's or coworkers' performance of their job responsibilities. Although team members are provided with user names and passwords, team members should not expect that any information sent or received over the Internet or stored on the network, computers or related equipment is confidential. Goodwin Living reserves the right to examine email, personal files and other information stored on the Goodwin Living network, individual workstations and any other electronic medium associated with the network at any time and without prior notice to ensure compliance with policies, support the performance of internal investigations, assist with the management of the network or for other reasonable business purposes.

Team members are prohibited from accessing the Goodwin Living network and the Internet for unethical purposes or purpose that violate Goodwin Living's policies, including, but not limited to, pornography, violence, gambling, and racism in violation of the harassment policy or any other illegal activity. Team members are prohibited from using profanity or vulgarity when using the network or accessing the Internet. Team members are prohibited from using the network or accessing the Internet for any other business or profit-making activities, and they may not download any software without the prior written approval of the Director of IT. Team members are prohibited from using Goodwin Living's e-mail system, Internet, the network, computers or related equipment to engage in any type of solicitation. Team members must comply with copyright and trademark laws when downloading material from the Internet.

Team members must abide by all federal and state laws with regard to information sent through the network and the Internet. The Goodwin Living Code of Conduct requires all team members to:

"Respect and protect the confidentiality of resident records and other personal information. We have a legal obligation

to safeguard and maintain the confidentiality of information about our residents. A resident's medical, financial or other personal information will not be disclosed to anyone except as permitted by law and by Goodwin Living policy or with the resident's permission."

In general, team members should exercise the same restraint and caution in drafting and transmitting messages over the network and the Internet as they would when writing a memorandum and should assume that their message will be saved and reviewed by someone other than the intended recipient.

Please contact the Director of IT for additional information about the Goodwin Living IT User Policy.

Email Policy

Team members with email access are required to (1) follow the GL Information Technology User Policy as outlined in this Handbook; (2) check their GL email each scheduled workday; (3) respond to emails either the same day or the next scheduled workday.

Use of Company Business Relationships

It is not permissible for any team member to take advantage of a business relationship established through Goodwin Living to elicit special consideration, extraordinary services or below-market pricing for personal gain. No team members should seek discounts or other financial benefits from any person or group doing business with Goodwin Living unless the transaction pertains to the team member's professional responsibilities with Goodwin Living.

Any team member who has questions regarding the applicability of these rules to a specific situation should consult the Director of Human Resources, Executive Director or Corporate Compliance Officers.

Social Networking Policy

At Goodwin Living we understand that social media can be a fun and rewarding way to share your life and opinions with family, friends, and co-workers around the world. However, use of social media also presents certain risks and carries with it certain responsibilities. To assist you in making responsible decisions about your use of social media, we have established these guidelines for appropriate use of social media.

This policy applies to all employees of Goodwin Living. Managers and supervisors should use the supplemental Social Media Management Guidelines for additional guidance in administering the policy.

Nothing in this policy is designed to interfere with, restrain, or prevent employee communications

regarding wages, hours, or other terms and conditions of employment.

Guidelines

In the rapidly expanding world of electronic communication, social media can mean many things. Social media includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else's web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or a chat room, whether or not associated or affiliated with Goodwin Living as well as any other form of electronic communication.

The same principles and guidelines found in Goodwin Living policies and these basic beliefs apply to your activities online. Ultimately, you are solely responsible for what you post online. Before creating online content, consider some of the risks and rewards that are involved. Keep in mind that any of your conduct that adversely affects your job performance, the performance of fellow team members or otherwise adversely affects members, customers, suppliers, people who work on behalf of Goodwin Living or Goodwin Living's legitimate business interests may result in disciplinary action up to and including termination.

Know and Follow the Rules

Carefully read these guidelines, the Goodwin Living Code of Conduct Statement, the Goodwin Living Information Technology Policy and the Discrimination and Harassment Prevention Policy, and ensure your postings are consistent with these policies. Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including termination.

Be Respectful

Always be fair and courteous to fellow team members, residents, members, suppliers, or people who work on behalf of Goodwin Living. Also, keep in mind that you are more likely to resolve work-related complaints by speaking directly with your co-workers or by utilizing our Open Door Policy than by posting complaints to a social media outlet. Nevertheless, if you decide to post complaints or criticism, avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating, that disparage residents, members, team members or suppliers, or that might constitute harassment or bullying. Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion or any other status protected by law or company policy.

Be Honest and Accurate

Make sure you are always honest and accurate when posting information or news, and if you make a mistake, correct it quickly. Be open about any previous posts you have altered.

Remember that the Internet archives almost everything; therefore, even deleted postings can be searched. Never post any information or rumors that you know to be false about Goodwin Living, fellow team members, members, customers, suppliers and people working on behalf of Goodwin Living.

Post Only Appropriate and Respectful Content

Maintain the confidentiality of Goodwin Living confidential and HIPAA information. Do not post internal reports, policies, procedures, or other internal business-related confidential communications.

Using Social Media at Work

Refrain from using social media while on work time or on equipment we provide, unless it is work-related as authorized by your manager or consistent with the Goodwin Living Policy. Do not use Goodwin Living's email addresses to register on social networks, blogs or other online tools utilized for personal use.

Retaliation is Prohibited

Goodwin Living prohibits taking negative action against any associate for reporting a possible deviation from this policy or for cooperating in an investigation. Any team member who retaliates against another team member for reporting a possible deviation from this policy or for cooperating in an investigation will be subject to disciplinary action, up to and including termination.

Media Contacts

Team members should not speak to the media on Goodwin Living's behalf. All media inquiries should be directed to the Chief Strategy and Marketing Officer or Corporate Director of Marketing and Communications.

For More Information

If you have questions or need further guidance, please contact Human Resources. Please see Blogging and Social Networking Policy for more in depth information.

Accidents and Injuries

If a team member is injured on the job, he or she will usually be entitled to worker's compensation benefits. Any work-related illness or injury that occurs while a team member is working, regardless of severity, is to be reported to the supervisor or manager on duty immediately. Failure to timely report work place injuries or illness may result in a denial of workers' compensation benefits.

Worker's compensation is solely a monetary benefit and does not provide a guaranteed leave of absence. If your work-related injury requires a leave of absence, this leave may count toward your annual Family and Medical Leave, if you qualify for such leave.

Any accident or injury to a resident or visitor on Goodwin Living premises should also be reported immediately to your supervisor or manager on duty.

Workplace Violence

Workplace violence will not be tolerated. Goodwin Living is committed to supporting a work environment that is free from violence and allowing team members to perform their tasks safely and efficiently without unlawful harassment, intimidation or threatening conduct from other team members, residents or visitors.

Threats, threatening language, images, or any other acts of aggression or violence made toward or by a Goodwin Living team member will not be tolerated. For purposes of this policy, a threat includes any verbal or physical harassment or abuse, attempts to intimidate or to instill fear in others, menacing gestures, bringing weapons into the workplace, stalking, or other hostile, aggressive injurious and/or destructive actions undertaken for the purpose of domination or intimidation.

Team members must immediately report to your director, the Human Resources Director or any other member of management any potentially dangerous situations that they experience, witness or about which they hear. Reports may be made anonymously. All reports will be promptly investigated. No team member will be subject to retaliation for reporting a threat or other potentially dangerous situations under this policy.

If an investigation confirms that a threat of a violent act or violence itself has occurred, Goodwin Living will take appropriate corrective action. Anyone, regardless of position or title, whom Goodwin Living determines has engaged in conduct that violates this policy, including retaliation, will be subject to discipline, up to and including termination.

If you are the recipient of a threat made by an outside party, please follow the steps detailed in this section. It is important for Goodwin Living to be aware of any potential danger in our workplace.

WORK RULES

Attendance and Tardiness Policy

To ensure the smooth operation of Goodwin Living facilities and to ensure a fair, equitable and rewarding workplace for all team members, regular attendance and punctuality is necessary and expected of all team members.

Departments maintain attendance and tardiness policies that relate to department specific time, attendance and tardiness policies. Please see your supervisor for detailed information.

It is expected that team members will be at their scheduled work areas at the start of their shift. Team members are scheduled to be at their workstation on-time. Clocking in after the start of your shift is considered tardy. If you are going to be absent or tardy from work, you must personally notify your direct supervisor in accordance with departmental policy. Failure to report for a scheduled shift without providing proper notice may result in disciplinary action. Unexcused, excessive, and/or patterned absences will result in disciplinary action, up to and including termination.

Management has the discretion to employ whatever disciplinary measure it deems appropriate, given the given the circumstances, in correcting improper conduct related to violations of work rules, common workplace expectations, poor attendance, tardiness, and/or poor performance. Individual departments maintain their own attendance and tardiness policies.

Goodwin Living is committed to complying with all federal, state and local laws providing you with the right to be away from work. All aspects of this attendance policy will be interpreted and applied to ensure compliance with these laws. Any unscheduled absence, tardiness or other occurrence that is protected by federal, state or local law will not count against a team member under these attendance guidelines or otherwise. Consistent with these requirements, Goodwin Living is prepared to consider absences which should be excused and/or additional time provided, as a reasonable accommodation under federal, state or local disability discrimination laws including, but not limited to, the Americans with Disabilities Act. If you believe an absence or tardiness is entitled to legal protection, please contact Human Resources.

Solicitation and Distribution Policy

Goodwin Living prohibits solicitation and distribution of material for any groups or organizations by any person not employed by Goodwin Living. Team members are prohibited from soliciting or distributing literature for any groups or organizations, including charitable organizations, in all working areas, such as resident rooms, resident apartments, recreation areas and dining rooms. Team members are also prohibited from soliciting or distributing literature for any groups or organizations during the team member's working time or the working time of the team member subject to solicitation or distribution. Working time includes the time during which the employee involved is actually scheduled to work and does not include meal and rest break periods or any other time when employees are not expected to perform their work tasks.

No one is permitted to sell merchandise or conduct any for-profit personal business while on the premises. By way of example, no sales of Girl Scout cookies, Boy Scout popcorn, or cosmetics are allowed.

Bulletin Boards

Goodwin Living maintains bulletin boards in suitable places for the posting of Goodwin Living notices and items of general importance. Bulletin boards are a valuable source of information and should be reviewed frequently, so that you can stay up-to-date on important Goodwin Living and work-related developments. You are responsible for reading the notices on the bulletin boards and will be held responsible for the observance of all rules and regulations posted. These bulletin boards are for official Goodwin Living business use only. Team members may not post or remove any material from the bulletin board.

Working for a Resident Outside of Work Hours

No one is permitted to perform “off-the-clock” services for residents or their family members.

General Rules of Conduct

When a team member does not perform satisfactorily or does not abide by our generally accepted rules of good conduct, including, but not limited to, those set forth throughout this Handbook, the team member can expect that appropriate disciplinary action will be taken. Such action may, but is not required to, include verbal warnings, written warnings, suspension and discharge, depending on the severity of the violation. Disciplinary decisions shall be made fairly and uniformly.

Certain specific rules of conduct are observed by Goodwin Living and violations of these rules may lead to disciplinary conduct, up to and including termination.

Examples of conduct that may lead to disciplinary action, up to and including termination include, but are not limited to, the following:

- unsatisfactory performance of duties;
- failure to follow a supervisor’s lawful instructions;
- deliberate restriction of output (for example, slowdown, delaying other employees’ work, etc.);
- leaving the premises during working times without the permission of your supervisor;
- failure to be at workstation at starting time;
- not performing assigned duties during working time
- leaving the department or assigned working area during working hours without permission of a supervisor, except to use the rest rooms;
- sleeping on the job;
- violation of the Goodwin Living Drug-Free and Alcohol-Free Policy;

- stopping work before the time specified;
- failure to notify Goodwin Living of an intended absence in accordance with departmental policy regulations or failure to give a satisfactory reason for absence when requested;
- lying on the application for employment;
- unexcused or excessive absence from work;
- failure to wear the proper uniform;
- violation of the Goodwin Living “No Solicitation/No Distribution Rule”;
- engaging in gambling, lottery or any other game of chance on the premises at any time;
- acceptance of tips, gifts or loans from residents or their families in violation of the Code of Conduct;
- inappropriate discussion or unauthorized disclosure of confidential resident or personnel related information (team members are free to discuss their wages, benefits, etc., but management may not share team member information for non-business related purposes).
- verbal, physical, or emotional abuse of another team member, resident, family member, guest or vendor;
- any deliberate act which may cause harm to any Goodwin Living resident, team member or visitor; neglect of the care of residents affecting their health, safety or mental well-being;
- fighting, threatening or attempting bodily injury to another person on Goodwin Living premises;
- illegal conduct on Goodwin Living property;
- insubordination;
- commission of a criminal offense;
- dishonesty;
- failure to keep your own timecard accurately or completing another team member’s time card;
- deliberately making, using, or assisting another team member in making or using falsified records, employment applications, time cards and similar documents;
- removing of notices or signs, or writing in any form on any bulletin board on Goodwin Living property
- theft of property belonging to Goodwin Living, another team member, resident, or visitor;
- unauthorized removal of Goodwin Living property or property of a resident, team member or visitor;
- malicious mischief that results in injury to another or destruction of property;
- possession of a firearm or any dangerous weapon on the premises;
- willful neglect, mishandling or damage to Goodwin Living property, including medical equipment and other equipment or possessions belonging to a resident or team member;

- waste or personal use of Goodwin Living supplies;
- failure to obtain any required health exam, drug or alcohol screen, doctor's certification, TB test or X-ray required for employment or continued employment;
- inappropriate use of access (for example, reading personal/confidential information while in a co-worker's office);
- engaging in any form of unlawful harassment; or
- failure to follow any other Goodwin Living rule, regulation or job requirement not specifically mentioned herein.

Goodwin Living will address violations of these rules of conduct and any other violations of company policy on an individual basis. Pursuant to Goodwin Living's at-will employment policy, the company reserves the right to impose whatever form of discipline it chooses, or none at all, in a particular instance. Disciplinary action may include, but is not limited to, oral or written warnings, suspension, demotion or involuntary termination. Nothing in this Handbook should be construed as a promise of specific treatment in a given situation.

Language in the Workplace

It is our policy that in the presence of our residents, team members are encouraged to not speak a language our residents do not understand. However, when not in the presence of the residents (e.g., in the team member break room) team members are welcome to speak a language other than English so long as it doesn't interfere with their ability to perform their job and to work with others.

SEPARATION FROM EMPLOYMENT

Resignation

Should a team member decide to leave Goodwin Living, we request a written two-week minimum notice of resignation. Scheduled vacation time and bereavement leave will not be recognized as part of the two-week notice period. To receive accrued PTO balance at the time of separation, a minimum of two-weeks' notice must be provided. Please note: no leave is accrued in the final two weeks of employment.

Department supervisors will work with team members to ensure that all uniforms, equipment and other property of Goodwin Living are returned and will complete a separation checklist confirming receipt of such items. In addition, the supervisor will ensure that any outstanding debts are paid before the final paycheck is issued. If any Goodwin Living item is not returned or paid for, a deduction may be taken from the employee's final paycheck providing the employee has signed an authorization allowing for a deduction from their paycheck.

Job Abandonment

Goodwin Living can only operate successfully if all team members perform their duties when and where they are assigned. It is critical, therefore, that you alert your supervisor of your inability to report to work for any reason. If we do not hear from you and you are absent without notice from work for two successive workdays, we will assume you have abandoned your job, and your employment will be terminated.

Termination

Team members of Goodwin Living are employed on an at-will basis, and Goodwin Living retains the right to terminate a team member at any time.

PTO Payout upon Separation

Team members who have worked at least three months, providing a minimum of two weeks' notice prior to separating from **Goodwin Living**, and working through their final scheduled pay period are entitled to receive accrued PTO. Team members who fail to provide two weeks' notice OR do not work through their notice period are not entitled to receive accrued PTO.

Team members whose employment is terminated involuntarily are entitled to receive accrued PTO providing the separation is not the result of an egregious infraction (i.e., theft, resident abuse, resident neglect, harassment, etc.).

Team members who provide notice but are not required to work through the end of their notice period are eligible to receive their accrued PTO.

Return of Company Property

The separating team member must return all company property on the last day of employment, including, but not limited to, uniforms, cell phones, keys, computers, laptops, and identification cards. Failure to return some items may result in deductions from the final paycheck, as permitted by state law. A team member will be required to sign the Wage Deduction Authorization Agreement to deduct the costs of such items from the final paycheck.

Exit Interview

Goodwin Living team members are encouraged to complete an exit interview with Human Resources upon separation. The exiting team member may be asked for feedback regarding their experience at Goodwin Living. Additionally, a benefits letter for those who qualify, will be provided to the team member to explain continued participation in the healthcare plan at the team member's expense through the Extension of Benefits, continuation of benefits, 401(k) distribution, W-2 mailings and other information will be explained.

OPEN-DOOR POLICY

It is our policy to provide effective channels of communication. We maintain an open-door policy so that team members may communicate openly, directly and comfortably with management. If team members ever feel they have not received fair and equitable treatment, they may, without fear of reprisal, access each level of management for careful and appropriate consideration and resolution.

Goodwin Living grants every team member the right to deal directly with his or her supervisor regarding all working conditions. If for any reason you would prefer to discuss a situation with someone else in management you may do so, and you will not be penalized for so doing. If you are not comfortable speaking with your supervisor, or if your supervisor is the reason for your concern, you are encouraged to go to your supervisor's supervisor before going directly to the Executive Director and/or President and CEO. In addition, you may always seek out the Director and/the Vice President of Human Resources.

We know from experience that our success depends greatly on the helpful thoughts and suggestions of employees. We welcome and encourage your ideas and suggestions. We value your professionalism, commitment, and ingenuity. Let us know how we can improve the quality of service and make Goodwin Living a more rewarding place to work.

Access to Personnel Files

To the extent possible, Goodwin Living will respect each team member's individual privacy. Except as provided below, no personal information will be provided about a team member without the team member's written consent or as required by law or needed for to conduct routine business. All team member records are the property of Goodwin Living and are to be used by Goodwin Living for authorized purposes only.

- Managers may review items in a team member's personnel file on a need-to-know basis only (for example, previous evaluations and write-ups).
- A current team member may review everything but the reference information associated with his or her file.
- Goodwin Living will provide access to team member information pursuant to a valid subpoena or request by federal or state agencies performing investigations. Only information that is pertinent to the request or investigation will be provided.

Team members should keep their personnel files up to date by informing us of any changes to their personnel information. Team members should also inform their supervisors or managers of any specialized training or skills acquired in the future. Unreported changes of address, marital status, etc. can affect withholding tax and benefit coverage. Further, an "out of date" emergency contact or an inability to reach a team member in a crisis may be extremely problematic.

Team Member Grievance Process

The purpose of the grievance process is to provide a mutually acceptable method for the prompt and equitable settlement of employee grievances. A grievance is defined as an incident or report of personal dissatisfaction on the part of any team member with regard to the administration of policies, procedures or other aspects of the working relationship with Goodwin Living. Actual policy and/or established procedures are not grounds for initiating the grievance process. The grievance process can be initiated for issues such as the administration of wages, hours of work, environmental working conditions, adverse disciplinary actions and allegations of personal bias or reprisal.

We encourage you to communicate your concerns to your supervisors, who will make a reasonable effort to address the issue within three working days. If you feel that you have not received a satisfactory answer or resolution from your supervisor, you may take the issue to your department director.

If you do not wish to discuss the matter with your supervisor or department director, or if the resolution provided is unsatisfactory, you may submit a complaint to Human Resources and the Human Resources Director will make a reasonable effort to address the issue within three working days. A written complaint is preferred, but oral complaints will be accepted. Notes of the meeting will be taken by a member of the Human Resources Department and signed by the team member. The complaint should be specific, identifying the policy or practice alleged to have been violated. Human Resources will then schedule an appointment with the Executive Director. If the team member is not satisfied with the outcome, he or she may, as a final appeal, request that the decision be reviewed by the President and CEO of Goodwin Living. The decision made by the President and CEO will be final and binding upon all parties.

RECEIPT OF TEAM MEMBER HANDBOOK

This Team Member Handbook, including any applicable state supplement, is an important document intended to help you become acquainted with Goodwin Living. This document contains management guidelines only; it is not the final word in all cases. Individual circumstances may call for individual attention.

Because Goodwin Living's operations may change, the contents of this Handbook may be changed at any time, with or without notice, in an individual case or generally, at the sole discretion of management, unless otherwise restricted by applicable law.

Please read the following statements and sign below to indicate your receipt and acknowledgment of this Team Member Handbook.

I have received and read a copy of the Team Member Handbook. I understand that the policies, rules and benefits described in it are subject to change at the sole discretion of Goodwin Living at any time, unless otherwise restricted by applicable law.

I further understand that my employment is terminable at will, either by myself or Goodwin Living, regardless of the length of my employment or the granting of benefits of any kind.

I understand that this is not a contract of employment, and that employment is "at will"

I understand that my signature below indicates that I have read and understand the above statements and that I have received a copy of the Team Member Handbook.

Team Member Printed Name: _____

Position: _____

Team Member Signature: _____

Date: _____

The signed original copy of this receipt should be given to Human Resources for your file.