



Employee Handbook

Whispering Winds Catholic Conference Center, Inc.

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Introduction

Introductory Statement

Welcome! As an employee of Whispering Winds Catholic Conference Center, Inc. (the “Company”), you are an important member of a team. We hope that you will find your position with the Company rewarding, challenging, and productive.

Because our success depends upon the dedication of our employees, we are highly selective in choosing new members for our team. We look to you and the other employees to contribute to the success of the Company.

Mission and Vision

The mission of Whispering Winds Catholic Conference Center, Inc. is to provide a Christ-centered environment, apart from the everyday world, where all are welcome to increase their knowledge of and commitment to Christ and join as fellow pilgrims on their journey of faith with God.

Handbook Purpose

This employee handbook is presented as a matter of information and has been prepared to inform employees about the Company’s philosophy, employment practices, policies, and the benefits provided to our valued employees, as well as the conduct expected from them. While this handbook is not intended to be a book of rules and regulations or a contract, it does include some important guidelines which employees should know. Except for the at-will employment provisions, the handbook can be amended at any time.

This employee handbook will not answer every question an employee may have, nor would the Company want to restrict the normal question and answer interchange among us. It is in our person-to-person conversations that we can better know each other, express our views, and work together in a harmonious relationship.

We hope this guide will help employees feel comfortable with us. The Company depends on its employees; their success is our success. Please don’t hesitate to ask questions. Every manager will gladly answer them. We believe employees will enjoy their work and their fellow employees here. We also believe that employees will find the Company a good place to work.

No one other than authorized management may alter or modify any of the policies in this employee handbook. No statement or promise by a supervisor, manager, or designee is to be interpreted as a change in policy, nor will it constitute an agreement with an employee.

Should any provision in this employee handbook be found to be unenforceable and invalid, such a finding does not invalidate the entire employee handbook, but only the subject provision. Nothing in this handbook is intended to infringe upon employee rights under Section 7 of the National Labor Relations Act (NLRA) or be incompatible with the NLRA.

We ask that employees read this guide carefully, become familiar with the Company and our policies, and refer to it whenever questions arise.

Employment

Equal Employment Opportunity

Whispering Winds Catholic Conference Center, Inc. is an equal opportunity employer and makes employment decisions on the basis of merit. We want to have the best available persons in every job. It is the policy of the Company to provide equal employment opportunities to all qualified individuals and to administer all aspects and conditions of employment without regard to the following:

- Race
- Color
- Age
- Sex
- Sexual orientation
- Gender
- Gender identity and gender expression
- Religion, including dress and grooming practices
- National origin, including language use restrictions
- Pregnancy, childbirth, or breastfeeding
- Marital status
- Genetic information, including family medical history
- Physical or mental disability
- Military or veteran status
- Citizenship and/or immigration status
- Child or spousal support withholding
- Domestic violence, assault, or stalking victim status
- Medical conditions, including cancer and AIDS/HIV
- Denial of family or medical care leave
- Political activities or affiliations
- Lawful conduct occurring during nonworking hours not on Company premises
- Credit report or credit information
- Prior non-conviction arrest record
- Any other protected class, in accordance with applicable federal, state, and local laws

Discriminatory, harassing, or retaliatory behavior is prohibited from coworkers, supervisors, managers, owners, and third parties, including clientele. The Company takes allegations of discrimination, harassment and retaliation very seriously and will promptly conduct an investigation when warranted.

Equal employment opportunity includes, but is not limited to, employment, training, promotion, demotion, transfer, leaves of absence and termination.

At Will Employment Status

Whispering Winds Catholic Conference Center, Inc. personnel are employed on an at-will basis. Employees are not hired for any definite or specified period of time even though employee wages are paid regularly. Employees are at-will with the Company and their employment can be terminated at any time, with or without cause and with or without prior notice. Company policy requires all employees to

be hired at-will and this policy cannot be changed by any oral modifications. There have been no implied or verbal agreements or promises to an employee that they will be discharged only under certain circumstances or after certain procedures are followed. There is no implied employment contract created by this handbook or any other Company document or written or verbal statement or policy.

Immigration Law Compliance

All individuals hired by the Company will be required to establish and certify their identity and right to work in the United States. Each individual employed by the Company will be required to complete Section 1 of Form I-9 on their first day of employment, and produce, within three business days, proof of their identity and eligibility to work in the United States.

Job Duties

During the introductory period, your supervisor will explain your job responsibilities and the performance standards expected of you. Be aware that your job responsibilities may change at any time during your employment. From time to time, you may be asked to work on special projects, or to assist with other work necessary or important to the operation of your department or Whispering Winds Catholic Conference Center, Inc. Your cooperation and assistance in performing such additional work is expected.

The Company reserves the right, at any time, with or without notice, to alter or change job responsibilities, reassign or transfer job positions, or assign additional job responsibilities.

Introductory Period

The employee's first 60 days of employment with the Company are considered an introductory period. This introductory period will be a time for getting to know fellow employees, managers and the tasks involved in the position, as well as becoming familiar with the Company's products and services. The supervisor or manager will work closely with each employee to help them understand the needs and processes of their job.

This introductory period is a try-out time for the employee and the Company. During this introductory period, the Company will evaluate employees' suitability for employment and employees can evaluate the Company as well. At any time during this first 60 days, employees may resign. If, during this period, employee work habits, attitude, attendance, performance or other relevant factors do not measure up to our standards, the Company may terminate employment.

At the end of the introductory period, the supervisor or manager will discuss each employee's job performance with them. During the course of the discussion, employees are encouraged to give their comments and ideas as well.

Completion of the introductory period does not guarantee continued employment for any specified period of time, nor does it require that an employee be discharged only for cause. Completion of the introductory period also does not imply that employees now have a contract of employment with the Company, other than at-will. Successful completion of the introductory period does not alter the at-will employment relationship.

A former employee who has been rehired after a separation from the Company of more than one year is considered an introductory employee during their first 60 days following rehire.

Background Checks

After making a conditional offer of employment, the Company may conduct a job-related background check. The background check may consist of prior employment verification, professional reference checks, education confirmation, criminal background, and/or credit checks, as permitted by law (if permitted by AB 22). Third-party services may be hired to perform these checks. All offers of employment and continued employment are contingent upon a satisfactory background check.

Employment Classifications

The Company has established the following employee classifications for compensation and benefit purposes only. An employee's supervisor or manager will inform the employee of their classification, status, and responsibilities at the time of hire, re-hire, promotion or at any time a change in status occurs. These classifications do not alter the employment at-will status.

Exempt Employees

Defined as employees whose positions meet specific tests established by the Fair Labor Standards Act (FLSA) and applicable state law and who are exempt from overtime pay requirements

Non-Exempt Employees

Defined as employees whose positions do not meet FLSA and state exemption tests and who are paid a multiple of their regular rate of pay for overtime hours worked. All employees who are covered by the federal or state minimum wage and overtime laws are considered non-exempt.

Regular Full-Time Employees

Regular full-time employees are those who are scheduled for and do work a minimum of 30 hours per week. Following the completion of the introductory period, regular full-time employees are eligible for health and dental benefits described in this handbook. Regular full-time employees must meet additional criteria to participate in our SIMPLE IRA plan.

Regular Part-Time Employees

Regular part-time employees are those who are scheduled for and do work fewer than 30 hours per week. Regular part-time employees are eligible for the following Whispering Winds Catholic Conference Center, Inc. benefits:

- 40 hours of Paid Sick Leave (PSL) per calendar year (refer to "Paid Sick Leave" below)
- SIMPLE IRA upon meeting earnings criteria.

Regular Employees

Regular employees are those who are hired to work on a regular schedule. Regular employees may be classified as full-time or part-time.

Seasonal Employees

Seasonal employees are those employed for short-term assignments. Short-term assignments generally are periods of three months or fewer; however, such assignments may be extended. Seasonal employees are not eligible for employee benefits except those mandated by applicable law.

Personnel Records

Whispering Winds Catholic Conference Center, Inc. will maintain various employment files while individuals remain an employee of the Company. Examples of these files are employee personnel files,

attendance files, I-9 files and files for medical purposes. If any changes with respect to personal information, such as a change in home address and telephone number or a change of name occur, employees are required to notify their supervisor or manager, so the appropriate updates can be made to the files. The Company will take reasonable precautions to protect employee files and employee personally identifiable information in its records.

Employee files have restricted access. Employees, their supervisor or manager, or their designated agents, may have access to those personnel files. In the event that an employee (or former employee) wishes to review their personnel file, they must do so in the presence of a supervisor or manager.

Employees may review or obtain a copy of their personnel file by making a written request to their supervisor or manager. The written request will become a permanent part of the personnel file and the Company will make the contents of those personnel records available to the employee within 30 days of receiving the request.

Disclosure of personnel information to outside sources, other than a designated representative, will be limited. However, the Company will cooperate with request from authorized law enforcement or local, state, or federal agencies conducting official investigations and as otherwise legally required.

Names and Addresses

Whispering Winds Catholic Conference Center, Inc. is required by law to keep current all employees' names and addresses. Employees are responsible for notifying the Company in the event of a name or address change.

Employee References

The Company makes strict provisions regarding information provided to people outside the Company for current and former employees. This information is restricted to the employment dates and positions held in the Company for that person. This is done to protect the Company and its employees. This information will only be released by authorized management.

Job Transfers

Management reserves its right to place employees where, and in whatever jobs it deems necessary. All job transfers, job changes, reassignments, promotions or lateral transfers are solely decided by the Company. Employees are encouraged to seek advancement opportunities within the organization and may submit an internal candidate application for any open position.

Conduct and Behavior

General Conduct Guidelines

Orderly and efficient operation of the Company requires that employees maintain proper standards of conduct and observe certain procedures. These guidelines are provided for informational purposes only and are not intended to be all-inclusive. Nothing here is intended or will be construed to change or replace, in any manner, the at-will employment relationship between the Company and the employee. Nothing here is intended to infringe upon employee rights under Section 7 of the National Labor Relations Act (NLRA). The Company views the following as inappropriate behavior:

1. Failure to follow the policies outlined in this handbook.
2. Negligence, carelessness or inconsiderate treatment of Company clients and/or their matters/files.
3. Theft, misappropriation or unauthorized possession or use of property, documents, records or funds belonging to the Company, or any client or employee; removal of same from Company premises without authorization.
4. Divulging trade secrets or other confidential business information to any unauthorized person(s) or to others without an official need to know.
5. Obtaining unauthorized confidential information pertaining to clients or employees.
6. Changing or falsifying client records, Company records, personnel or pay records, including time sheets without authorization.
7. Willfully or carelessly damaging, defacing or mishandling property of a client, the Company or other employees.
8. Taking or giving bribes of any nature, or anything of value, as an inducement to obtain special treatment, to provide confidential information or to obtain a position. Acceptance of any gratuities or gifts must be reported to a supervisor or manager.
9. Entering Company premises without authorization.
10. Willfully or carelessly violating security, safety, or fire prevention equipment or regulations.
11. Unauthorized use of a personal vehicle for Company business.
12. Conduct that is illegal under federal, state, or local law.
13. Creating a disturbance on Company premises.
14. Use of abusive language.
15. Any rude, discourteous or un-businesslike behavior, on or off Company premises, which is not protected by Section 7 of the National Labor Relations Act (NLRA) and which adversely affects the Company services, operations, property, reputation or goodwill in the community or interferes with work.
16. Insubordination or refusing to follow instructions from a supervisor or manager; refusal or unwillingness to accept a job assignment or to perform job requirements.
17. Failure to observe scheduled work hours, failure to contact a supervisor or manager in the event of illness or any absence within 30 minutes of the scheduled start of work; failure to report to work when scheduled; abuse of sick leave or any other leave of absence.
18. Leaving the office during scheduled work hours without permission; unauthorized absence from assigned work area during regularly scheduled work hours.
19. Sleeping during regular working hours.
20. Recording time for another employee or having time recorded to or by another employee.
21. Use or possession of intoxicating beverages or illegal use or possession of narcotics, marijuana or drugs (under state, federal or local laws), on Company premises during working hours or reporting

to work under the influence of intoxicants or drugs so as to interfere with job performance, or having any detectable amount of illegal drugs in an employee's system.

22. Unauthorized possession of a weapon on Company premises.
23. Illegal gambling on Company premises.
24. Soliciting, collecting money, vending, and posting or distributing bills or pamphlets during working hours in work areas. These activities are closely controlled in order to prevent disruption of Company services and to avoid unauthorized implication of Company sponsorship or approval. However, this general rule is not intended to hinder or in any way curtail the rights of free speech or free expression of ideas. Therefore, such activity by employees during non-working time, including meal and rest periods, is not restricted so long as such activity does not interfere with the orderly and regular conduct of the Company business, is lawful, in good taste, conducted in an orderly manner, and does not create safety hazards or violate general good housekeeping practices. Any person who is not an employee of the Company is prohibited from any and all forms of solicitation, collecting money, vending, and posting or distributing bills or pamphlets on Company property at all times.
25. Falsification of one's employment application, medical or employment history.

Sexual and Other Unlawful Harassment

Whispering Winds Catholic Conference Center, Inc. is committed to providing a work environment free of harassment, disrespectful or other unprofessional conduct. Sexual harassment and unlawful harassment are prohibited behavior and against Company policy. The Company is committed to providing a work environment free of inappropriate and disrespectful behavior, intimidation, communications and other conduct directed at an individual because of their sex, including conduct that may be defined as sexual harassment.

Applicable federal and state law defines sexual harassment as unwanted sexual advances, requests for sexual favors, or visual, verbal, or physical conduct of a sexual nature when: (1) submission of the conduct is made a term or condition of employment; or (2) submission to or rejection of the conduct is used as basis for employment decisions affecting the individual; or (3) the conduct has the purpose or effect of unreasonably interfering with the employees work performance or creating an intimidating, hostile, or offensive working environment. The following list contains examples of prohibited conduct. They include, but are not limited to:

- Unwanted sexual advances;
- Offering employment benefits in exchange for sexual favors;
- Making or threatening reprisals after a negative response to sexual advances;
- Visual conduct such as leering, making sexual gestures, or displaying sexually suggestive objects, pictures, cartoons, or posters;
- Verbal conduct such as making or using derogatory comments, epithets, slurs, sexually explicit jokes, or comments about any employee's body or dress;
- Verbal abuse of a sexual nature, graphic verbal commentary about an individual's body, sexually degrading words to describe an individual, or suggestive or obscene letters, notes, or invitations;
- Physical conduct such as touching, assault, or impeding and/or blocking movements;
- Retaliation for reporting harassment or threatening to report harassment.

Sexual harassment on the job is unlawful whether it involves coworker harassment, harassment by a manager, or harassment by persons doing business with or for the Company, such as clients, customers or vendors.

Other Types of Harassment

Prohibited harassment on the basis of race, color, religion, national origin, ancestry, physical or mental disability, veteran status, age, or any other basis protected under local, state or federal law, includes behavior similar to sexual harassment, such as:

- Verbal conduct such as threats, epithets, derogatory comments, or slurs;
- Visual conduct such as derogatory posters, photographs, cartoons, drawings, or gestures;
- Physical conduct such as assault, unwanted touching, or blocking normal movement;
- Retaliation for reporting harassment or threatening to report harassment.

Retaliation

It is against Company policy and unlawful to retaliate in any way against anyone who has lodged a harassment complaint, has expressed a concern about harassment, including sexual harassment, or has cooperated in a harassment investigation. Therefore, the initiation of a complaint, in good faith, will not under any circumstances be grounds for disciplinary action.

Enforcement

All managers and supervisors are responsible for:

- Implementing the Company policy on harassment, which includes, but is not limited to, sexual harassment and retaliation;
- Ensuring that all employees they supervise have knowledge of and understand the Company policy;
- Reporting any complaints of misconduct to the designated company representative, Executive Director, so they may be investigated and resolved internally;
- Taking and/or assisting in prompt and appropriate corrective action when necessary to ensure compliance with the policy, and; Conducting themselves in a manner consistent with the policy.

Harassment Complaint Procedure

The Company's complaint procedure provides for an immediate, thorough and objective investigation of any claim of unlawful or prohibited harassment, appropriate disciplinary action against one found to have engaged in prohibited harassment, and appropriate remedies for any victim of harassment. A claim of harassment may exist even if the employee has not lost a job or some economic benefit.

Anyone who has been subjected to the conduct prohibited under this policy, or who has knowledge of such conduct, should report this information following the normal Complaint Procedure as soon as possible. However, employees are not required to report any prohibited conduct to a supervisor who may be hostile, who has engaged in such conduct, who is a close associate of the person who has engaged in the conduct in question or with whom the employee is uncomfortable discussing such matters. Complaints regarding harassment or retaliation may be oral or in writing. Any individual who makes a complaint that is demonstrated to be intentionally false may be subject to discipline, up to and including termination.

All reported incidents of prohibited harassment will be promptly investigated. When the investigation is complete, a determination regarding the reported harassment will be made and communicated to the employee who complained and to the accused harasser. During the investigation, confidentiality will be preserved to the fullest extent possible without compromising the Company's ability to conduct a good faith and thorough investigation.

If the Company determines that prohibited harassment has occurred, the Company will take effective remedial action commensurate with the circumstances. Appropriate action will also be taken to deter any future harassment. If a complaint of prohibited harassment is substantiated, appropriate disciplinary action, up to and including discharge, will be taken.

The Company recognizes that actions that were not intended to be offensive may be taken as such. An employee who believes that they have been subjected to sexual harassment by anyone is encouraged, but not required, to promptly tell the person that the conduct is unwelcome and ask the person to immediately stop the conduct. A person who receives such a request must summarily comply with it and must not retaliate against the employee for rejecting the conduct. The Company encourages, but does not require, individuals to take this step before utilizing the above Complaint Procedure.

Abusive Conduct

Abusive conduct means malicious conduct of an employer or employee in the workplace that a reasonable person would find hostile, offensive, and unrelated to an employer's legitimate business interests. Abusive conduct may include repeated infliction of verbal abuse, such as the use of derogatory remarks, insults, and epithets, verbal or physical conduct that a reasonable person would find threatening, intimidating, or humiliating, or the gratuitous sabotage or undermining of a person's work performance. A single act will generally not constitute abusive conduct, unless especially severe and egregious.

The Company considers abusive conduct in the workplace unacceptable and will not tolerate it under any circumstances. Employees should report any abusive conduct to a supervisor or manager with whom employees are comfortable speaking. Supervisors and managers are to assume the responsibility to ensure employees are not subjected to abusive conduct. All complaints will be treated seriously and investigated promptly. During the investigation process the Company will attempt to maintain confidentiality to the fullest extent possible.

It is a violation of Company policy to retaliate or otherwise victimize an employee who makes a complaint or a witness who serves in the investigation of the abusive conduct allegation.

Complaint Procedure

The Company subscribes to the open-door policy. Employees may bring a particular complaint to their supervisor or manager for resolution. When matters cannot be handled on an informal basis, the Company has established a formal procedure for a fair review of any work-related controversy, dispute or misunderstanding. A complaint may be brought by one or more employees concerning any work-related problem where the complaint has not been satisfactorily resolved in an informal manner. Employees may skip to Step 2 if the complaint is related to their supervisor or manager or if they feel they would not provide an impartial resolution to the problem.

Step 1: The complaint should be submitted in writing to a supervisor, manager or designee as promptly as possible. A written request for a meeting must be submitted simultaneously. Generally, a meeting will be held within three working days of the employee's request depending upon scheduling availability. Witnesses will be allowed as necessary. If the problem is not resolved during this meeting the supervisor, manager or designee will give the employee a written resolution within three working days. If the employee is not satisfied, the employee may proceed to Step 2.

Step 2: If the employee is not satisfied after Step 1, the employee may submit a written request for review of the complaint and Step 1 solution to the Executive Director or their designee. Such a request

should be made within three working days following the receipt of the Step 1 resolution. The Executive Director or appointed representative will review the complaint and proposed solution and may call a further meeting to explore the problem. This meeting is to be attended by the employee concerned, the employee's supervisor or manager (if appropriate), and any other employee of the Company whom the aggrieved employee chooses. The Executive Director or appointed representative will render the final decision within ten working days after receiving the Step 2 request, assuming scheduling availability. The decision will be given to the employee in writing and will become part of the employee's personnel file.

Corrective Action

A high level of job performance is expected of each and every employee. In the event that an employee's job performance does not meet the standards established for the position, employees should seek assistance from their supervisor or manager to attain an acceptable level of performance. If employees fail to respond to or fail to make positive efforts toward improvement, corrective action may ensue, including termination of employment.

It is the policy of the Company to regard discipline as an instrument for developing total job performance rather than as punishment. Corrective action is one tool the Company may select to enhance job performance. The Company is not required to take any disciplinary action before making an adverse employment decision, including discharge. Corrective action may be in the form of a written or oral reprimand, notice(s) of inadequate job performance, suspension, discharge or in any combination of the above, if the Company so elects. The Company reserves its prerogative to discipline, and the manner and form of discipline, at its sole discretion.

If employees violate established Company procedures, guidelines, or exhibit behavior that violates commonly accepted standards of honesty and integrity or creates an appearance of impropriety, the Company may elect to administer disciplinary action.

Compensation

Pay Periods & Paydays

Whispering Winds Catholic Conference Center, Inc. pay dates are every other Friday, for a two-week period that ends the previous Sunday. If a regular payday falls on a holiday, the pay date will be on Thursday instead of Friday. The payroll period begins 12 a.m. Monday and ends the second Sunday thereafter at 11:59 p.m. Timecards are due by noon on Tuesday once every two weeks for all hours worked in the previous pay period.

If you believe that an improper deduction has been made, you should immediately report this information to your direct supervisor, or to the Executive Administrator. Reports of improper deductions will be promptly investigated. If it is determined that an improper deduction has occurred, you will be promptly reimbursed.

Wage Garnishments

Whispering Winds Catholic Conference Center, Inc. encourages all employees to meet their financial obligations without involving the Company. The Company will adhere to legally imposed wage arrangements.

Timekeeping Requirements

All non-exempt employees are required to use a time card to record time worked for payroll purposes. All time worked must be accurately reported on your time card.

Employees must record their own time at the start and at the end of each work period. Employees must clock out for their meal period and record the start and end of the meal period.

Employees are not allowed to work "off the clock." Working off the clock violates company policy.

Employees also must record their time whenever they leave work for any reason other than Whispering Winds Catholic Conference Center, Inc. business.

Employees will be required to certify that their time record is accurate.

Any errors on your timecard should be reported immediately to your supervisor.

Please also refer to the Company's Meal and Rest Break Policy.

Overtime

Whispering Winds Catholic Conference Center, Inc. complies with all applicable federal and state laws with regard to payment of overtime work. When operating requirements or other needs cannot be met during regular working hours, you may be required to work overtime. All overtime work must be authorized in advance by your supervisor. Working overtime without prior authorizations or the refusal or unavailability to work overtime may result in disciplinary action.

All non-exempt employees are paid a premium of overtime hours as follows:

- One and one-half times their regular pay for all hours worked in excess of 8 hours per workday, up to 12, or in excess of 40 in a workweek;

- One and one-half times their regular rate of pay for the first 8 hours on the seventh consecutive day of work in a workweek; and
- Double the regular rate of pay for all hours worked in excess of 12 hours in a workday and after 8 hours on the seventh consecutive day of work in a workweek.

Exempt employees are not entitled to overtime pay.

Performance Evaluations

Each employee will receive periodic performance reviews conducted by his or her supervisor. The first performance evaluation will take place after completion of the introductory period. Subsequent performance evaluations will be conducted annually, on or near the employment anniversary date. The frequency of performance evaluations may vary depending upon length of service, job position, past performance, changes in job duties, or recurring performance problems.

Performance evaluations may review factors such as the quality and quantity of the work performed, knowledge of the job, initiative, work attitude, and attitude toward others. The performance evaluations are intended to make employees aware of progress, areas for improvement, and objectives or goals for future work performance. Favorable performance evaluations do not guarantee increases in salary or promotions. Salary increases and promotions are solely at the discretion of Whispering Winds Catholic Conference Center, Inc. and depend upon many factors in addition to performance. After the review, employees will be required to sign the evaluation report simply to acknowledge that it has been presented to them, that they have discussed it with their supervisor, and that they are aware of its contents.

Expense Reimbursement

This policy establishes the reimbursement procedures for travel, entertainment, and other business expenses ("business expenses") incurred during the conduct of Company business. It is Company policy to reimburse employees for ordinary, necessary, and reasonable expenses when directly related to the transaction of Company business. Directly related means:

- There is the expectation of deriving some current or future benefit for the Company
- The employee is actively engaged in a business meeting or activity necessary to the performance of the employee's job duties, or
- There is a clear business purpose for entertainment

Employees are expected to exercise prudent business judgment regarding expenses covered by this policy. Reimbursement for expenses that are outside the scope of this policy requires the prior written approval of management.

The following expenses may be reimbursable under this policy:

- Lodging
- Travel expenses including airfare, reasonable airline luggage fees, train fare, bus, taxi, and related tips
- Meals, including tips between 15-20%
- Business telephone calls
- Laundry and/or dry-cleaning expenses during trips in excess of 5 days
- Car rental
- Personal mileage
- Tolls
- Conference and convention fees

- Business entertainment expenses
- Parking
- Other reasonable and necessary business expenses, not specifically excluded by this policy, and with prior approval

Employees who utilize personal cars for business travel will be reimbursed at the per mile rate established annually by the Company.

The following expenses are not reimbursable under this policy unless approved by the Executive Director:

- Child care costs
- Airline club dues
- Barber/hairstylist
- Toiletries
- Traffic fines
- Tips in excess of 20%
- In-flight movies or refreshments
- Hotel room movies and other forms of personal entertainment
- Luggage, briefcases
- Alcohol
- First class airfare

No policy can anticipate every situation that might give rise to legitimate business expenses. Reasonable and necessary expenses not listed above may be incurred. When prior approval is required, managers are responsible for using professional judgment to determine if an unlisted expense is reimbursable under this policy.

Expense Reimbursement Forms

All expense reimbursement requests shall be submitted on an Expense Reimbursement Form which can be obtained from your direct supervisor or the Executive Administrator.

Employees shall submit completed expense reimbursement forms to their direct supervisor for approval. Managers shall submit completed expense reimbursement forms to the Executive Administrator.

All invoices and all expense reimbursement line items shall be expense-coded by the manager. Expense codes include the four-digit expense account number followed by the three-digit department number. Expense codes can be obtained from the Executive Administrator.

Expenses shall be reimbursed every other week, opposite payroll weeks. Managers may submit for expense reimbursement during off-weeks, acknowledging that they may not receive reimbursement that same week.

Advances & Loans

Whispering Winds Catholic Conference Center, Inc. does not give salary advances or loans to its employees.

Benefits

Benefits Eligibility

During the first 60 days of continuous employment at Whispering Winds Catholic Conference Center, Inc., you will not be eligible for health insurance benefits. Once you have completed the 60 days, you become eligible for the health insurance benefits on the first day of the following month.

Medical Insurance

Whispering Winds Catholic Conference Center, Inc. provides a comprehensive medical insurance plan and a dental insurance plan for eligible employees. Eligible employees are regular, full-time employees who work 30 or more hours per week. Coverage will begin on the first day of the month following their 60-day anniversary (i.e. hire date of April 7, coverage begins July 1). Dependent coverage is available at an additional cost. In the event of an increase in medical insurance premium rates, all employees may be required to contribute to the cost of increased premiums to retain coverage. Details about medical insurance coverage are available in a separate publication distributed by the business office.

Unemployment Compensation

Whispering Winds Catholic Conference Center, Inc. contributes each year to the California Unemployment Insurance Fund on behalf of its employees.

Social Security

Social Security is an important part of every employee's retirement benefit. Whispering Winds Catholic Conference Center, Inc. pays a matching contribution to each employee's Social Security taxes.

Workers' Compensation

Whispering Winds Catholic Conference Center, Inc., in accordance with state law, provides insurance coverage for employees in case of work-related injury. The name of the Company's workers' compensation insurance carrier and other pertinent information is posted. The carrier governs all insurance benefits provided by the Company. These contracts shall not be limited, expanded or modified by any statements of Company personnel or Company documents. Any discrepancies shall be determined by reference to the insuring contracts.

To ensure that you receive any workers' compensation benefits to which you may be entitled, you will need to:

- Immediately report any work-related injury to your supervisor;
- Seek medical treatment and follow-up care if required;
- Complete a written *Employee's Claim for Workers Compensation Benefits* (DWC Form 1) and return it to the business department; and
- Provide the Company with a certification from your health care provider regarding the need for workers' compensation disability leave, as well as your eventual ability to return to work from the leave.

Upon submission of a medical certification that an employee is able to return to work after a workers' compensation leave, the employee under most circumstances will be reinstated to his or her same position held at the time the leave began, or to an equivalent position, if available. An employee returning from a workers' compensation leave has no greater right to reinstatement than if the employee had been continuously employed rather than on leave. For example, if the employee on

workers' compensation leave would have been laid off had he or she not gone on leave, or if the employee's position has been eliminated or filled in order to avoid undermining the Company's ability to operate safely and efficiently during the leave, and no equivalent or comparable positions are available, then the employee would not be entitled to reinstatement.

An employee's return depends on his or her qualifications for any existing openings. If, after returning from a workers' compensation disability leave, an employee is unable to perform the essential functions of his or her job because of a physical or mental disability, the Company's obligations to the employee may include reasonable accommodation, as governed by the Americans with Disabilities Act or state law.

The law requires the Company to notify the workers' compensation insurance company of any concerns of false or fraudulent claims.

Retirement Plan

Whispering Winds Catholic Conference Center, Inc. provides a SIMPLE IRA plan for eligible employees in order to assist in planning for their retirement. For information regarding eligibility, contributions, benefits, and tax status, contact the business department. All eligible participants will receive a summary plan description.

Holidays

Whispering Winds Catholic Conference Center, Inc. observes the following paid holidays:

- January 1 (New Year's Day)
- Memorial Day
- July 4 (Independence Day)
- Labor Day
- Thanksgiving Day
- Christmas Day

When a holiday falls on a Saturday or Sunday, it is usually observed on the preceding Friday or the following Monday, respectively. However, the Company may grant another day off in lieu of closing. Holiday observance will be announced in advance.

If you are a Regular, Full Time employee and you are required to work on a paid scheduled holiday you will receive straight time for the regular time worked and be given another day off with pay to be taken within 30 days of the holiday.

Vacation

Regular, full-time employees are entitled to vacation based upon their years of active service. Active service commences with an employee's first day of work and continues thereafter unless broken by an absence without pay, a leave of absence, or termination of employment. Seasonal and part-time employees do not accrue paid vacation.

Vacation can accrue to a maximum of three weeks (120 hours). An employee who reaches his or her accrual cap will stop accruing vacation until he or she uses some vacation time and reduces his or her accrued vacation below the maximum of 120 hours.

Employees become eligible to take accrued vacation any time after the employee's first day of employment, as work schedules permit.

All scheduled vacations must be pre-approved by the appropriate manager or supervisor prior to being put on the vacation schedule. Employees must check with their managers or supervisors to learn whether they are subject to any restrictions on the use of vacation time at certain times during the year. A vacation request may be denied if it would result in the Company having too few employees on duty to properly fulfill its customer or donor demands during the requested vacation period. Vacation that is used for reasons other than vacation (e.g. for illness, medical appointments, school visitation, etc.) should be scheduled in advance whenever possible.

An employee whose employment terminates will be paid for accrued, unused vacation.

Employees do not accrue vacation during unpaid leave.

Vacation will be accrued on the following basis:

Less than 5 years of employment

Exempt Employees	3.0800 hours per pay period
Exempt Employee (30 hrs/week)	2.3100 hours per pay period
Non-exempt Employees	.0385 hours per hour worked

Over 5 but less than 15 years of employment

Exempt Employees	4.6160 hours per pay period
Exempt Employees (30 hrs/week)	3.4620 hours per pay period
Non-exempt Employees	.0577 hours per hour worked

Over 15 years of employment

Exempt Employees	6.1520 hours per pay period
Exempt Employees (30 hrs/week)	4.6140 hours per pay period
Non-exempt Employees	.0769 hours per hour worked

An employee may not use vacation before its accrual unless authorized in writing by the Executive Director.

Paid Sick Leave

All employees will be granted 40 hours of paid sick leave (PSL) per 12 months on their employment date. Unused PSL will not carry over past the 12 months. Employees will receive a new allotment of PSL on their anniversary date.

Employees may begin using their PSL on the 90th day of employment. PSL may be used for the following reasons:

- When you are unable to work due to your own illness, injury or medical condition;
- When you need to obtain preventative care, medical treatment, a diagnosis or other medical reasons;
- To assist a “designated person,” an individual related by blood or whose association is equivalent of a family relationship, with an illness, injury, or medical condition or in obtaining medical treatment or diagnosis;
- When the Company is closed due to a public health emergency;
- To care for a child whose school or child care provider is closed due to a public health emergency; and
- “Safe time” for you or your family member to obtain assistance services (counseling, relocation,

medical treatment) or legal services (obtaining restraining orders, preparing for or appearing in court) due to domestic violence, sexual assault or stalking.

PSL may be used in minimum increments of two hours. When the need for PSL is foreseeable, employee must give their supervisor reasonable advance notice before taking PSL. If the need for PSL is unforeseeable, employee must provide notice as soon as practicable, and are expected to call their supervisor at least 30 minutes before the start of their scheduled shift. When possible, employees are expected to schedule planned preventative care and medical and dental appointments in a manner that minimizes disruption of work flow. PSL shall run concurrently with time off provided by state and federal leave laws, where permitted by law.

Unused PSL will not be paid on termination. However, if employee is rehired within one year, their PSL time will be reinstated.

Reasonable documentation may be required when taking PSL.

Use of Unpaid Leave

You are required to take accrued and unused Vacation and/or Paid Sick Time (PSL) before taking unpaid leave or having unpaid absences. This does not include leave that is pregnancy-related.

Employees who are absent because of their own disability may be eligible for State Disability Insurance (SDI) benefits. SDI payments do not begin until after you have been absent from work for seven (7) calendar days. If you have unused Paid Sick Leave or accrued Vacation, these will be used for the first seven (7) days before SDI payments begin.

SDI benefits do not replace all of your usual wages. Your SDI benefits can be supplemented with any accrued and unused Vacation pay.

If you are absent for a reason that qualifies you for Paid Family Leave (PFL) payments (explained below), you are required to first use any accrued and unused Vacation, up to a maximum of two weeks in a 12-month period.

PFL benefits do not replace all of your usual wages. Your PFL benefits can be supplemented with any accrued and unused Vacation pay.

State Disability Insurance

The State of California has a partial wage-replacement insurance plan for California workers. The cost of this insurance is fully paid by the employee through payroll deductions. The State Disability Insurance program includes both Disability Insurance and Paid Family Leave.

Disability Insurance

Employees who lose wages when an illness, injury or pregnancy-related disability prevents them from working and who meet all the state eligibility requirements can collect disability insurance benefits.

The benefits are calculated as a percentage of employee salary up to a weekly maximum as specified by law, for up to 52 weeks.

Employees who apply for this benefit must provide written notice of disability, including a doctor's certificate stating the nature of the disability and the expected date of return to work.

Employees are responsible for filing their claim and other forms promptly and accurately with the Employment Development Department. A claim form may be obtained from the Employment

Development Department online, by telephone, or in person.

Paid Family Leave

Employees may be eligible for partial wage replacement benefits under the Paid Family Leave Act for up to a maximum of eight weeks for the following reasons:

- To bond with a new child after birth or placement for adoption or foster care;
- To care for a serious health condition of an employee's child, parent, parent-in-law, grandparent, grandchild, sibling, spouse, or registered domestic partner.

The Paid Family Leave Act provides benefits based on past quarter earnings for up to eight weeks in a 12-month period. The cost of the insurance is fully paid by the employee. The 12-month period begins on the first day an employee submits a claim.

To be eligible for benefits, employees may be required to provide medical and/or other information that supports a claim for time off to bond with a new child or to care for a child, parent, spouse or registered domestic partner with a serious health condition. In addition, there is a seven-calendar day waiting period before benefits begin.

The employee is responsible for filing their claim for family leave insurance benefits and other forms promptly and accurately with the Employment Development Department. A claim form may be obtained from the Employment Development Department by telephone, letter, the Internet or in person. All eligibility and benefit determinations are made by the Employment Development Department.

Employees may not be eligible for Paid Family Leave benefits if they are receiving Disability Insurance, Unemployment Compensation Insurance or Workers' Compensation benefits.

The Paid Family Leave Act does not provide a right to leave, job protection or return to work rights. Further, this policy does not provide additional time off; rather, family leave insurance may provide compensation during an approved leave pursuant to any corporation provided leave.

Temporary Disability Leave

The Company recognizes that a temporary disability may preclude an employee's attendance at work. In such cases, the Company does not have a predetermined specified period of time in which this unpaid leave is granted. Rather, the Company will attempt to reasonably accommodate the needs of the employee as well as the needs of the Company. If a leave is granted, any extensions will be subject to the same considerations.

Employees that request a temporary disability leave must do so in writing. That request should be accompanied by a doctor's statement identifying the temporary disability, the date and the estimated date of return and, where appropriate, diagnosis and prognosis. Should the employee's expected return date change, the employee should notify the Company as soon as possible. Prior to returning to employment with the Company, employees will be required to submit written medical certification of their ability to work, including any restrictions. Upon returning to work, if employees qualify, they will be reinstated to their former position or one that is substantially the same, depending upon the availability of any position at that time.

The California Family Rights Act

An employee who has worked for the Company for at least 12 months, has put in at least 1,250 hours in the 12 months immediately prior to leave, and works at a site where the Company has at least 20 employees within 75 miles, will be entitled to up to 12 weeks of unpaid leave under the California Family Rights Act. The leave must be taken within one year of a new child being born, adopted, or placed in foster care with the employee. The employee will be reinstated to the same position or an equivalent position upon return.

The Company will continue to pay the regular portion, if any, of the employee's health insurance premium while the employee is on leave. The Company reserves the right to recover the costs of maintaining coverage if the employee chooses not to return to work for a reason other than a serious health conditions or circumstance beyond the employee's control.

If foreseeable, an employee should provide the Company with 30 days' notice of the intent to take leave. If this is not possible, notice should be given as soon as possible. If both parents entitled to leave under the Act are employed with the Company, the Company may limit the total leave taken between the two of them to 12 weeks.

Pregnancy disability leave is treated separately from family care and medical leave in California. An employee may take both pregnancy leave and leave for birth, adoption, or fostering of a child. Please contact Human Resources for additional details on which leave laws may apply to your circumstances.

Bereavement Leave

Whispering Winds Catholic Conference Center, Inc. grants leave of absence to employees in the event of the death of the employee's current spouse, registered domestic partner, child, parent, legal guardian, brother, sister, grandparent, or grandchild; or mother-, father-, sister-, brother-, son-, or daughter-in-law. Within three months of such a death in the family, an employee may take leave for up to five scheduled workdays and it may be used intermittently with the approval of the Company. Up to three of the five days will be a paid leave of absence. The employee's supervisor may approve additional unpaid time off.

School Activities

Employees are encouraged to participate in the school activities of their child(ren). The absence is subject to the following conditions:

- Parents, guardians, or grandparents having custody of one or more children in kindergarten or grades 1 to 12 may take time off for a school activity;
- The time off for school activity participation cannot exceed eight hours in any calendar month, or a total of 40 hours each school year;
- Employees planning to take time off for school visitations must provide as much advance notice as possible to their supervisor;
- If both parents are employed by Whispering Winds Catholic Conference Center, Inc., the first employee to request such leave will receive the time off. The other parent will receive the time off only if the leave is approved by his or her supervisor;
- Employees must use accrued Vacation time in order to receive compensation for this time off;

- Employees who do not have accrued Vacation available will take the time off without pay. Employees must provide their supervisor with documentation from the school verifying that the employee participated in a school activity on the day of the absence for that purpose.

School Leave for Disciplinary Matters

The Company will grant unpaid time off for employees who are parents or guardians of school-age children who need time off to attend disciplinary events at school such as hearings and/or meetings for other events including suspension and expulsion. Employees are required to give reasonable notice to the Company that they need to take time off.

The employee must use available vacation or personal leave for school visitation and must take leave without pay if no paid leave is available. Exempt employees may be provided time off with pay when necessary to comply with state and federal wage and hour laws. In agreement with California Labor Code Section 230.7, no discriminatory action will be taken against an employee who takes time off for this purpose.

Time Off for Voting

If an employee cannot vote because of their scheduled work hours, then the employee will be given additional time off to vote in any state or federal election.

Employees must apply for leave at least two days before Election Day. The Company may specify the time during the day that leave can be taken. Generally, time off will be at the beginning or end of their shift, whichever allows the most free time for voting and the least time off from the regular working shift, unless otherwise mutually agreed upon.

Up to two hours will be compensated at the employee's regular rate of pay. Additional time off, when necessary, will be unpaid for non-exempt employees.

Witness Leave

If an employee is absent from work to serve as a witness in a judicial proceeding in which they are the victim, or in response to a subpoena or other order of the court, the employee will be granted leave without pay for such time as it is necessary to comply with the request. The Company may request proof of the need for leave.

Jury Service Leave

Whispering Winds Catholic Conference Center, Inc. recognizes that jury duty is a civil responsibility of our employees. The Company will pay full-time, non-exempt employees normal hourly compensation during jury duty up to two days in a calendar year. If additional time is required, it will be granted without pay. However, employees may use accrued Vacation if available. Employees must provide notice as soon as practicable and provide a copy of their summons notice.

Any fees received for jury duty, including travel fees, are to be retained by the employee. Employees are to report to work on any day, or portion thereof that is not actually spent in the performance of jury service. For each week of jury duty, a certificate of jury service must be certified by the Court and filed with the Company no later than Wednesday of the following week.

Exempt employees who work any portion of a week in which they also serve jury duty will be paid their full week's salary under the Fair Labor Standard Act (FLSA).

If an employee is called during a particularly busy period, we may ask you to request for postponement. Whispering Winds will provide additional documents, if necessary, to obtain such postponement.

Jury duty can last as little as a day or up to several months. During this time, you will be considered on a leave of absence and will be entitled to receive applicable employee benefits. While serving on jury duty, you are expected to contact your supervisor periodically to update them on your status.

Personal Leave of Absence

Once an employee has been employed as a full-time regular employee of the Company for 90 days they may request a personal leave of absence without pay. The employee must submit their request in writing and state the date the leave is to begin, the date of return to work, and the reasons for the leave. The employee will receive either written approval or denial of the request. If approved, employees must use their leave of absence for the approved reason or purpose. Sick leave, vacation time, seniority, and other benefits are not earned during an unpaid leave of absence. Any paid holidays that fall within the leave of absence are not paid. If an employee fails to return to work on the scheduled date of return, the employee will be considered to have abandoned their position and voluntarily terminated their employment.

Pregnancy Disability Leave

The Pregnancy Disability Leave (PDL) Act allows an employee who is disabled due to pregnancy, childbirth, or related medical conditions to take a pregnancy-related disability leave. If you are planning to take PDL, advise the Human Resources department as early as possible. Please make an appointment with the Executive Administrator to discuss the following conditions:

- The length of PDL will be determined by the advice of your physician, but employees disabled by pregnancy may take up to four months of leave per pregnancy (the working days you normally would work in one-third of a year or 17 1/3 weeks). Part-time employees are entitled to leave on a pro rata basis. The four months of leave includes any period of time for actual disability caused by your pregnancy, childbirth or related medical condition. This includes leave for severe morning sickness and for prenatal care, doctor-ordered bed rest, as well as other reasons. Your health care provider determines how much time you need for your disability;
- Whispering Winds will also reasonably accommodate medical needs related to pregnancy, childbirth or related conditions, or temporarily transfer you to a less strenuous or hazardous position (where one is available) or duties if medically needed because of your pregnancy;
- If you need to take PDL, you must inform Whispering Winds when a leave is expected to begin and how long it will likely last. If the need for a leave, reasonable accommodation or transfer is foreseeable (such as the expected birth of a child or a planned medical treatment for yourself), you must provide at least 30 days advance notice before the PDL or transfer is to begin. Consult with Human Resources regarding the scheduling of any planned medical treatment or supervision in order to minimize disruption to the operations of the Company. Any such scheduling is subject to the approval of your health care provider;
- For emergencies or events that are unforeseeable, we need you to notify Whispering Winds, at least verbally, as soon as practical after you learn of the need for the leave;

- Failure to comply with these notice requirements may result in delay of PDL, reasonable accommodation or transfer;
- Pregnancy leave usually begins when ordered by your healthcare provider. You must provide Whispering Winds with a written certification from a health care provider for need of PDL, reasonable accommodation or transfer. The certification must be returned no later than 15 calendar days after it is requested by the Company. Failure to do so may, in some circumstances, delay PDL, reasonable accommodation or transfer. Please see Human Resources for a medical certification form to give to your health care provider;
- Leave returns will be allowed only when your healthcare provider sends a release;
- You may use accrued sick time (if otherwise eligible to take the time) during a pregnancy disability leave. An employee will be allowed to use accrued vacation or personal time (if otherwise eligible to take the time) during a PDL; and
- Leave does not need to be taken in one continuous period of time and may be taken intermittently, as needed. Leave may be taken in increments of [e.g., 30 min., one hour-increment (note: employer may not set minimum increment larger than one hour)].

If intermittent leave or leave on a reduced work schedule is medically advisable you may, in some instances, be required to transfer temporarily to an available alternative position that meets your needs. The alternative position does not need to have equivalent job duties, but must have the equivalent rate of pay and benefits, and you must be qualified for the position. The position must better accommodate your leave requirements than your regular job. Transfer to an alternative position can include altering an existing job to better accommodate the employee's need for intermittent leave or a reduced work schedule.

When your healthcare provider releases you to return to work from PDL, you will be reinstated to your same position held at the time the leave began or, in certain instances, to a comparable position, if available. There are limited exceptions to this policy. An employee returning from a pregnancy disability leave has no greater right to reinstatement than if the employee had been continuously employed.

If you are on PDL, you will be allowed to continue to participate in group health insurance coverage for up to a maximum of four months of disability leave (if such insurance was provided before the leave was taken) at the level and under the conditions that coverage would have been provided if you had continued in employment continuously for the duration of the leave. In some instances, the Company can recover premiums paid to maintain your health coverage if you fail to return from PDL.

In addition, at the start of the SDI wage replacement, Whispering Winds will contribute the difference between the SDI benefits and your wages prior to PDL for up to 10 weeks. If you work less than 40 hours per week, Whispering Winds' contribution will be calculated based on your average weekly wages prior to PDL.

Military Leave

If employees are on an extended military leave of absence, they are entitled to be restored to their previously held position or similar position, if available, without loss of any rights, privileges or benefits

provided the employee meets the requirements specified in the Uniformed Services Employment and Reemployment Rights Act (USERRA).

An employee who is a member of the reserve corps of the armed forces of the United States or of the National Guard or the Naval Militia will be granted temporary leave of absence without pay while engaged in military duty as required by state employment law. A letter from the employee's commanding officer is required to establish the dates of duty.

Military Family Leave

An employee who works an average of 20 or more hours per week whose spouse is a member of the Armed Forces, National Guard or Reserves that has been deployed during a period of military conflict is eligible to receive up to 10 unpaid days off when their spouse is on leave from military deployment.

An employee must provide their supervisor with a notice of intention to take leave within two business days of receiving official notice that their spouse will be on leave from deployment. Employees taking family military leave must also provide the Company with written documentation certifying their spouse will be on leave from deployment.

Civil Air Patrol Leave

The Company will provide not less than 10 days of leave per year for voluntary members of the California Wing of the Civil Air Patrol in order for volunteers to respond to an emergency operational mission.

The employee volunteer must be employed for at least 90 days immediately before the leave begins. Employees are required to give the Company as much notice as possible of the intended leave dates. Upon return, the employee is entitled to their position or position with equivalent seniority, benefits, pay and other terms of employment unless conditions unrelated to leave render such restoration impractical.

Volunteer Emergency Responder Leave

Employees who are volunteer firefighters, reserve peace officers, or emergency rescue personnel will be allowed to take temporary unpaid leaves of absence for the purpose of performing emergency duties. Employees who are volunteer emergency responders should inform their supervisor so that they are aware that the employee may need to take time off for emergency duty. When an employee is called to an emergency and needs to miss work, they should alert their supervisor before doing so whenever possible.

Crime Victim Leave

The Company will grant reasonable and necessary leave from work without pay to employees who are victims, or employees who are not victims themselves, to take time off to help *family members* who are victims, including a child, parent, grandparent, grandchild, sibling, spouse, domestic partner or a "designated person," who is any individual related by blood "or whose association with the employee is the equivalent of a family relationship." A victim is an individual who suffers a "qualifying act of violence," which includes a violent or serious felony, or felonious theft or embezzlement, for the purposes of attending legal proceedings related to the crime.

When feasible, affected employees must provide the Company with advance notice of the employee's

need for leave, including a copy of the notice of the scheduled proceeding. If advance notice is not feasible, affected employees must provide documentation evidencing the legal proceeding requiring the employee's absence within a reasonable time after leave is taken.

Exempt employees may be provided time off with pay when necessary to comply with state and federal wage and hour laws.

Victims of Domestic Violence, Sexual Assault & Stalking Leave

The Company will not discriminate against employees who are victims of domestic violence, sexual assault, or stalking for taking time off from work to obtain or attempt to obtain any relief, including but not limited to a temporary restraining order, restraining order, or other injunctive relief to help ensure the health, safety, or welfare of a victim or their child.

The Company will also not discriminate against an employee who is a victim of domestic violence, sexual assault, or stalking for taking time off from work to seek medical attention for injuries caused by such domestic violence or sexual assault, to obtain services from a domestic violence, sexual assault, or stalking program, to obtain psychological counseling related to the domestic violence, sexual assault, or stalking or to participate in actions to increase safety from future domestic violence, sexual assault, or stalking including temporary or permanent relocation. The Company will make reasonable accommodations for victims of domestic violence, sexual assault, or stalking, including but not limited to the implementation of safety measures.

Affected employees must give the Company reasonable notice that they are required to be absent for a purpose stated above, except for unscheduled or emergency court appearances or other emergency circumstances. In such a case, the Company will take no action against affected employees if, within a reasonable time after the appearance, they provide the Company with documentary evidence that their absence was required for any of the above reasons.

This leave is unpaid. However, affected employees may use any unused sick or vacation time towards the leave. Exempt employees may be provided time off with pay when necessary to comply with state and federal wage and hour laws.

Bone Marrow Donation Leave

Employees who have worked for at least 90 days will be granted up to five paid working days in a one-year period for the purpose of donating bone marrow. Employees are required to utilize any earned vacation or sick leave, but if this leave has been exhausted, the Company will continue to pay regular wages for up to five working days. Leave can be taken intermittently.

Any applicable benefits including the employees' health coverage, accrued paid time off (e.g. vacation, sick leave, etc.), and other benefits will be maintained during the leave. Bone marrow donation leaves of absence do not run concurrently with leaves under the Family and Medical Leave Act (FMLA) or the California Family Rights Act (CFRA). Upon returning to work from a donor leave, the employee will be restored to the same or an equivalent position. The Company may request proof of the need for leave.

Organ Donation Leave

Employees who have worked for at least 90 days who donate an organ to another individual will be granted up to 30 paid working days in a one-year period for this purpose. Employees are required to use any earned but unused sick leave or vacation time (up to a maximum of two weeks), but if this leave has

been exhausted or the leave exceeds two weeks, the Company will continue to pay regular wages for up to 30 days. Exempt employees will continue to receive their full salary in compliance with state and federal regulations.

Any applicable benefits including the employee's health coverage, accrued paid time off (e.g. vacation, sick leave, etc.), and other benefits will be maintained during the leave. Organ donation leaves of absence do not run concurrently with leaves under the Family and Medical Leave Act (FMLA) or the California Family Rights Act (CFRA). Upon returning to work from a donor leave, the employee will be restored to the same or an equivalent position. The Company may request proof of the need for leave.

Rehabilitation Leave

The Company is committed to providing assistance to our employees. Any employee who wishes to voluntarily enter and participate in an alcohol and/or drug rehabilitation program may be granted a reasonable accommodation. This accommodation may include time off without pay and/or an adjusted work schedule, provided the accommodation does not impose an undue hardship on the Company. In general, it is the employee's responsibility to notify their supervisor or manager of the need for accommodation.

This policy does not prevent the Company from refusing to hire or disciplining, up to and including discharge, an employee who is unable to perform his or her duties or cannot perform the duties in a manner that would not endanger his or her health or safety or the health or safety of others because of the current use of alcohol or drugs.

Literacy Education Assistance

The Company will reasonably accommodate and assist any employee who reveals a problem with literacy and requests assistance in enrolling in an adult literacy education program, provided that it does not impose an undue hardship on the Company.

The Company will make reasonable efforts to safeguard the privacy of the employee as to the reason for their request under this policy. Approved time off of work to enroll and participate in an adult literacy education program will be unpaid; exempt employees will be paid in accordance with the Fair Labor Standards Act (FLSA).

School Leave for Activity Attendance

The Company will grant employees who are the parent, guardian, or grandparent having custody of children in grades K-12, or of children attending a licensed daycare facility, up to 40 hours of leave without pay per calendar year to participate in activities of their child's school or daycare facility. This leave should not exceed 8 hours in any calendar month. Requests for such leave must be made in advance of the planned absence and employees must provide documentation from the school or daycare facility as proof of their participation in school or daycare activities.

The employee must use available vacation or personal leave for school visitation and must take leave without pay if no paid leave is available. Exempt employees may be provided time off with pay when necessary to comply with state and federal wage and hour laws.

School Leave for Disciplinary Matters

The Company will grant unpaid time off for employees who are parents or guardians of school-age children who need time off to attend disciplinary events at school such as hearings and/or meetings for other events including suspension and expulsion. Employees are required to give reasonable notice to the Company that they need to take time off.

The employee must use available vacation or personal leave for school visitation and must take leave without pay if no paid leave is available. Exempt employees may be provided time off with pay when necessary to comply with state and federal wage and hour laws.

Company Property

Hardware

Furniture, desks, vehicles, golf carts, tools, machinery and equipment are Whispering Winds Catholic Conference Center, Inc. property and must be kept clean and maintained according to Company rules and regulations. Employees must exercise care to prevent loss and damage. Prior written authorization must be obtained before any Company property may be removed from the premises or used for personal reasons.

Electronics and Software

Computers, iPads, cellphones and application software are Whispering Winds Catholic Conference Center, Inc. property and must be maintained according to Company rules and regulations.

Communications and Data

- Voice mail, email and text messages are Whispering Winds Catholic Conference Center, Inc. property. For example, email messages are considered Company records.
- Information stored in Whispering Winds Catholic Conference Center, Inc. computers and file servers, including without limitation, donor information and lists, vendor lists, spreadsheets and research data is the property of the Company and may not be distributed outside the Company in any form whatsoever without the written permission of the Executive Director.
- Employees are not permitted to access the electronic communications of other employees or third parties unless directed to do so by Whispering Winds Catholic Conference Center, Inc. management.
- It is a violation of Whispering Winds Catholic Conference Center, Inc., policy to use computers, cell phones, communications, data or the Internet in a manner that: is discriminatory harassing or obscene; constitutes copyright or trademark infringement; violates software licensing rules; is illegal; or is against Company policy. It is also a violation of policy to use computers, cell phones, communications, data or the Internet to communicate confidential or sensitive information or trade secrets.
- This description of prohibited usage is not exhaustive, and it is within the discretion of Whispering Winds Catholic Conference Center, Inc. to determine if there has been a violation of this policy. Employees that engage in prohibited use will be subject to discipline and/or immediate termination.
- This policy is not intended to limit the ability of employees to discuss with other employees the terms and conditions of their employment, including such topics as wages, job performance, workload, supervisors, or staffing.

Passwords

Whispering Winds Catholic Conference Center, Inc. may periodically need to assign and/or change passwords for voice mail, email, cellphones, servers, third-party or cloud-based programs and storage, etc. The Company reserves the right to keep a record of and override any passwords.

Monitoring of Company Property & Resources

Whispering Winds Catholic Conference Center, Inc. reserves the right to inspect all Company property to ensure compliance with its rules and regulations, without notice to the employee and at any time, not necessarily in the employee's presence.

Company computers, phones, communications, messages, internet history and data are subject to monitoring to ensure that no misuse or violation of Company policy or any law occurs. No one should expect privacy regarding such use.

Personal Use of Company Resources

Whispering Winds Catholic Conference Center, Inc. provides computers, cell phones, communications, data, and information technology resources, including the Internet, to some of its employees to help them do their job. Generally, these Company resources should be used for business related purposes. However, the Company recognizes that occasional personal use of these Company resources and property may occur during working time. The Company allows such occasional personal use if the usage does not interfere with the employee's work performance, take away from work time, consume supplies, slow other users, slow the servers or computer systems, or tie up printers or other shared resources, or violate any Company policy, including policies against harassment, discrimination and disclosure of confidential or trade secret information. All policies relating to monitoring usage of Company property apply. The Company reserves the right to adjust this policy on a case by case basis as it deems appropriate.

Employee-owned Property

Whispering Winds Catholic Conference Center, Inc. recognizes that occasional use of the employee's own computer or cellphone may occur during working hours. The Company allows such occasional personal use if the usage does not interfere with the employee's work performance, take away from work time or violate any Company policy. All other company policies, including the Company's no tolerance for discrimination, harassment or retaliation in the workplace apply. The Company reserves the right to adjust this policy on a case by case basis as it deems appropriate.

Social Media

Only authorized individuals are allowed to speak/write in the name of Whispering Winds Catholic Conference Center, Inc. using the social media tools of the Company such as the Company Facebook, Instagram and Twitter page. Marketing and Development may authorize you to use these Company social media tools to perform your job duties. Authorized individuals using the Company social media tools shall identify themselves honestly, accurately and completely and comply with all Company policies in using this media.

Your authorization is limited to business purposes and personal use of these Company social media tools or programs is prohibited and can result in discipline up to and including termination. All policies relating to monitoring usage of Company property apply.

Employees can use their own personal devices to engage in social media during non-working times, such as breaks and meal periods; however, all other Company policies against inappropriate usage, including the Company's no tolerance for discrimination, harassment or retaliation in the workplace, and protection of confidential and trade secret information apply.

Nothing in the Company's social media policy is designed to interfere with, restrain or prevent employee communications regarding wages, hours or other terms and conditions of employment.

Workplace Guidelines

Off-the-Clock Work

Non-exempt employees must accurately record all time worked, regardless of when and where the work is performed. Off-the-clock work (engaging in work assignments or duties that are not reported as time worked) is prohibited. No member of management may request, require, or authorize non-exempt employees to perform work without compensation. This includes checking email on personal devices after work hours. Any possible violations should be reported promptly to a supervisor or member of management.

Meal and Rest Periods

Rest Breaks

All non-exempt employees are entitled to rest break periods during their workday. If you are a non-exempt employee, you will be paid for all such break periods, and you will not clock out. You are required to remain on the work premises during your rest break(s). You are expected to return to work promptly at the end of any rest break.

Number of Rest Breaks

You will be authorized and permitted one (1) ten-minute rest break for every four (4) hours you work (or major fraction thereof, which is defined as any amount of time over two [2] hours). A rest break need not be authorized for employees whose total daily work time is less than three and one half (3.5) hours.

If you work a shift from three and one-half (3.5) to six (6) hours in length you will be entitled to one (1) ten-minute rest break. If you work more than six (6) hours and up to ten hours, you will be entitled to two (2) ten-minute rest breaks. If you work more than ten hours and up to 14 hours, you will be entitled to three (3) ten-minute rest breaks.

Timing of Rest Breaks

You are authorized and permitted to take a rest break in the middle of each four-hour work period.

There may be practical considerations that make this general timing infeasible and that require Whispering Winds Catholic Conference Center, Inc. to deviate from this general rule. You will be informed if there are practical considerations that make this timing infeasible.

Your rest break will be scheduled by your supervisor or manager.

Meal Period

All non-exempt employees will be provided an uninterrupted unpaid meal period of at least 30 minutes if you work more than five (5) hours in a workday. You must clock out for your meal period. You will be permitted a reasonable opportunity to take this meal period, and you will be relieved of all duty. During your meal period, you are free to come and go as you please and are free to leave the premises. You are expected to return to work promptly at the end of any meal period.

If your total work period for the day is more than five hours per day but no more than six hours, you may waive the meal period. This cannot be done without the mutual consent of you and your supervisor. You must submit a written request for any such waiver, in advance, to your supervisor.

Timing of Meal Period

Your meal period will be provided no later than the end of your fifth hour of work. For example, if you begin work at 8:00 a.m., you must start your meal period by 12:59 p.m. (which is before the end of your fifth hour of work).

Your meal period will be scheduled by your supervisor or manager.

Second Meal Period

If you work more than ten hours in a day, you will be provided a second, unpaid meal period of at least 30 minutes. Again, you must clock out for your meal period. You will be permitted a reasonable opportunity to take this meal period, and you will be relieved of all duty. There will be no control over your activities during your meal period. During your meal period, you are free to leave the premises and are free to come and go as you please. You are expected to return to work promptly at the end of any meal period.

Timing of Second Meal Period

This second meal period will be provided no later than the end of your tenth hour of work. For example, if you begin work at 8:00 a.m., you must start your second meal period by 5:59 p.m. (which is before the end of your tenth hour of work).

Your second meal period will be scheduled by your supervisor or manager.

Recording Meal Periods

You must clock out for any meal period and record the start and end of the meal period.

Employees are not allowed to work "off the clock." All work time must be accurately reported on your time record.

If for any reason you are not provided a meal period in accordance with our policy, or if you are in any way discouraged or impeded from taking your meal period or from taking the full amount of time allotted to you, please immediately notify the business department.

Anytime you miss a meal period that was provided to you (or you work any portion of a provided meal period), you will be required to report to the business department and document the reason for the missed meal period or time worked.

Please also refer to Whispering Winds Catholic Conference Center, Inc.'s Timekeeping Policy.

Makeup Time

Non-exempt employees may request to make up lost time due to personal obligations, without being paid overtime, provided no more than 11 hours are worked in a workday of 40 hours in a workweek. The makeup hours must be worked in the same workweek as the missed hours. Use of makeup time in lieu of overtime must be approved by management.

Lactation Accommodation

The Company provides a supportive environment to enable breastfeeding employees to express breast milk during work hours for up to one year following the birth of a child. Accommodations under this policy include a place, other than a bathroom, that is shielded from view and free from intrusion from co-workers and the public which may be used by an employee to express breast milk. Discrimination and harassment of breastfeeding mothers in any form is unacceptable and will not be tolerated.

Punctuality and Attendance

As an employee of Whispering Winds Catholic Conference Center, Inc., you are expected to be punctual and regular in attendance. Any tardiness or absence causes problems for your fellow employees and your supervisor. When you are absent, your assigned work must be performed by others.

Employees are expected to report to work as scheduled, on time, and prepared to start work. Employees also are expected to remain at work for their entire work schedule, except for meal periods, breaks or when required to leave on authorized Company business. Late arrival, early departure, or other unanticipated and unapproved absences from scheduled hours are disruptive and must be avoided.

If you are unable to report for work on any particular day, you must under all but the most extenuating circumstances call your supervisor at least one hour before the time you are scheduled to begin working for that day. If you call less than one hour before your scheduled time to begin work and do not arrive in time for your assigned shift, you will be considered tardy for that day. In all cases of absence or tardiness, employees must provide their supervisor with an honest reason or explanation. Employees also must inform their supervisor of the expected duration of any absence.

Repeated absences, excessive absences (excused or unexcused) or a pattern of absences are unacceptable job performance. If an employee is absent for three consecutive days and has not provided proper notification, the Company will assume that the employee has abandoned their position and may be treated as having voluntarily terminated employment with the Company.

Absences protected by state and federal law do not count as a violation of this policy.

Personal Appearance and Hygiene

The Company requires all employees to present a professional image to the public and clients. Accordingly, employees must wear appropriate attire while at the office or conducting Company business.

Expensive clothing is not necessary for a well-groomed appearance. Clothing should be clean and neat in appearance. Employees should consider their level of customer and public contact and the types of meetings they are scheduled to attend in determining what attire is appropriate.

The Company wishes to provide a work environment that is free of safety hazards, offensive behavior and harassment of any kind. Therefore, the following are generally not acceptable:

- Bare feet, flip flops
- Spandex, sweats, or work out attire
- Pants, shorts, or skirts worn below the waistline
- Sexually provocative clothing or exposed undergarments
- Clothing with offensive slogans or pictures
- Clothing showing excessive wear and tear
- Any clothing or accessories that would present a safety hazard
- Tattoos that are not appropriate in content

All employees are expected to maintain clean and appropriate oral and bodily hygiene. Hair (including facial hair) should be clean and neat. Accessories should be moderate and businesslike and should not interfere with an employee's work. The excessive use of perfume or cologne is unacceptable, as are odors that are disruptive or offensive to others or may exacerbate allergies.

Managers are responsible for enforcing dress and grooming standards for their department. Any employee whose appearance does not meet these standards may be counseled. If the appearance is unduly distracting or the clothing is unsafe, the employee may be sent home to correct the situation.

Reasonable accommodation will be made for employees' sincerely held religious beliefs and disabilities whenever possible, consistent with the business necessity. If you would like to request an accommodation or have other questions about this policy, please contact your supervisor.

Customer Relations

Employees are expected to be polite, courteous, prompt, and attentive to every customer. When an employee encounters an uncomfortable situation that he or she does not feel capable of handling, your supervisor should be called immediately.

Customers are to be treated courteously and given proper attention at all times. Never regard a customer's question or concern as an interruption or an annoyance. You must respond to inquiries from customers, whether in person or by telephone, promptly and professionally.

Never place a telephone caller on hold for an extended period. Direct incoming calls to the appropriate person and make sure the call is received.

Through your conduct, show your desire to assist the customer in obtaining the help he or she needs. If you are unable to help a customer, find someone who can.

All correspondence and documents, whether to customers or others, must be neatly prepared and error-free. Attention to accuracy and detail in all paperwork demonstrates your commitment to those with whom we do business.

Never argue with a customer. If a problem develops, or if a customer remains dissatisfied, ask your supervisor to intervene.

Use of Company Cell Phone While Driving

If your job requires that you use your cellphone while you are driving, you must use it hands-free and voice-operated. Violating this policy is a violation of law and a violation of Company rules.

Employees Under Age 18:

A person under the age of 18 years is prohibited from driving a motor vehicle while using a cellphone, even if equipped with a hands-free device. The prohibition would not apply to such a person using a cellphone for emergency purposes. Violating this policy is a violation of law and a violation of Company rules.

Confidentiality

In the course of your work, you may have access to confidential information regarding Whispering Winds Catholic Conference Center, Inc., its suppliers, its customers, or perhaps even fellow employees. There shall be no disclosure of any confidential information or trade secrets to anyone outside the Company without the appropriate authorization. Confidential information may include internal reports, policies, procedures, and other internal business-related communications. Trade secrets may include information regarding the development of systems, processes, products, design, instruments, formulas and technology. In addition, always respect financial disclosure laws and third party intellectual property.

It is an employee's duty and responsibility to safeguard all confidential information. This includes the

dissemination of information by any available means, including but not limited to telephone, fax, and email.

When any inquiry is made regarding an employee or any former employee, the inquiry must be forwarded to a supervisor or manager without comment from the employee. When any inquiry is made regarding any client, the inquiry must be forwarded to a supervisor or manager.

Confidential information shall be disclosed and/or discussed only on a “need to know” basis. Conversation of a confidential nature must never be held within earshot of the public or clients.

This policy is intended to alert employees to the need for discretion at all times and is not intended to inhibit normal business communications. In addition, nothing in this policy is intended to infringe upon employee rights under Section 7 of the National Labor Relations Act (NLRA).

Health, Safety and Security

Health and Safety

All employees are responsible for their own safety, as well as that of others in the workplace. To help us maintain a safe workplace, everyone must be safety-conscious at all times. Employees must report all work-related injuries or illnesses immediately to your supervisor or to the business department. In compliance with California law, and to promote the concept of a safe workplace, Whispering Winds Catholic Conference Center, Inc. maintains an Injury and Illness Prevention Program. The Injury and Illness Prevention Program is available for review by employees and/or employee representatives in the business department's office.

In compliance with Proposition 65, the Company will inform employees of any known exposure to a chemical known to cause cancer or reproductive toxicity.

Security

Whispering Winds Catholic Conference Center, Inc. has developed guidelines to help maintain a secure workplace. Be aware of persons loitering for no apparent reason in parking areas, walkways, entrances and exits, and service areas. Report any suspicious persons or activities to your supervisor. Secure your desk or office at the end of the day. When called away from your work area for an extended length of time, do not leave valuable and/or personal articles in or around your workstation that may be accessible. The security of facilities as well as the welfare of our employees and guests depends upon the alertness and sensitivity of every individual to potential security risks. You should immediately notify your supervisor when unknown persons are acting in a suspicious manner in or around the facilities, or when keys or identification badges are missing.

Non-Smoking

In accordance with California law, smoking is prohibited in any public building and within 20 feet of a main entrance, exit, or window of a public building. In alignment with this law and our commitment to providing a healthy and safe work environment, the Company does not permit the use of any tobacco or nicotine products—including but not limited to cigarettes, cigars, e-cigarettes (vapes), chewing tobacco, snuff, nicotine pouches, and nicotine vaporizers—in any company buildings, facilities, work sites, or vehicles.

Employees wishing to use tobacco or nicotine products may do so only during their designated break periods and **only in designated outdoor areas**, in full compliance with local ordinances and posted signage. These designated areas must be outside of restricted zones and away from main entrances, exits, windows, or ventilation systems.

Use of **FDA-approved nicotine replacement therapy** (such as patches, gum, or lozenges) for smoking cessation is permitted, provided it does not create a disruption or safety concern in the workplace.

Drug and Alcohol Use

Whispering Winds Catholic Conference Center, Inc. is concerned about the use of alcohol, marijuana and illegal drugs as it affects the workplace. Use of these substances, whether on or off the job can detract from an employee's work performance, efficiency, safety and health, and therefore seriously impair the employee's value to the Company. In addition, the use or possession of these substances on the job

constitutes a potential danger to the welfare and safety of other employees and exposes the Company to the risks of property loss or damage, or injury to other persons.

Furthermore, the use of prescription drugs and/or over-the-counter drugs also may affect an employee's job performance and may seriously affect the employee's value to the Company.

The following rules and standards of conduct apply to all employees either on Company property or during the workday (including meals and rest periods). Behavior that violates Company policy includes:

- Possession or use of an illegal or controlled substance not prescribed to you, or being under the influence of an illegal or controlled substance not prescribed to you while on the job;
- Driving a Company vehicle while under the influence of alcohol or any substance (drugs prescribed, over-the-counter, or otherwise); and
- Distribution, sale, or purchase of an illegal or prescribed controlled substance while on the job.

Violation of these rules and standards of conduct will not be tolerated. The Company may also bring the matter to the attention of appropriate law enforcement authorities.

In order to enforce this policy, the Company reserves the right to conduct searches of Company property or employees and/or their personal property and to implement other measures necessary to deter and detect abuse of this policy.

An employee's conviction on a charge of illegal sale or possession of any controlled substance while off Company property will not be tolerated because such conduct, even though off duty, reflects adversely on Whispering Winds Catholic Conference Center, Inc. In addition, the Company must keep people who sell or possess controlled substances off Company premises in order to keep the controlled substances themselves off the premises.

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

Whispering Winds Catholic Conference Center, Inc. will encourage and reasonably accommodate employees with alcohol or drug dependencies to seek treatment and/or rehabilitation. Employees desiring such assistance should request a treatment or rehabilitation leave. The Company is not obligated, however, to continue to employ any person whose performance of essential job duties is impaired because of drug or alcohol use, nor is the Company obligated to re-employ any person who has participated in treatment and/or rehabilitation if that person's job performance remains impaired as a result of dependency. Additionally, employees who are given the opportunity to seek treatment and/or rehabilitation, but fail to successfully overcome their dependency or problem, will not automatically be given a second opportunity to seek treatment and/or rehabilitation. This policy on treatment and rehabilitation is not intended to affect the Company's treatment of employees who violate the regulations described previously. Rather, rehabilitation is an option for an employee who acknowledges a chemical dependency and voluntarily seeks treatment to end that dependency.

Heat Illness

Employees who work outside may be exposed to extreme temperatures or adverse working conditions, particularly in the summer months. All supervisors are trained in the prevention of heat illness. Please refer to the Company's Injury and Illness Prevention Program or talk to your supervisor for details on how to ensure you are protected from heat illness dangers.

Injury and Accident Response and Reporting

In the event that an employee becomes injured or witnesses an injury during working hours, they must report it immediately to the nearest available supervisor or manager. Employees are to render any assistance requested by supervisor, or manager. Questions asked by law enforcement or fire officials making an investigative report should be answered giving only factual information and avoiding speculation. Liability for personal injury or property damage should never be admitted in answering an investigatory question asked by law enforcement or fire officials.

When any accident, injury, or illness occurs while an employee is at work, regardless of the nature or severity, the employee must obtain an injury reporting form and complete and return the form to Human Resources as soon as possible. Reporting should not be allowed to delay necessary medical attention. Once the accident is reported, follow-up will be handled by Human Resources or the designated Safety Officer. The employee may not return to work without the permission of Human Resources or the Safety Officer.

In addition to compliance with safety measures imposed by federal Occupational Safety and Health Act (OSHA) and state law, the Company has an independent interest in making its facilities a safe and healthy place to work. The Company recognizes that employees may be in a position to notice dangerous conditions and practices and therefore encourages employees to report such conditions, as well as all non-functioning or hazardous equipment, to a supervisor or manager immediately. Appropriate remedial measures will be taken when possible and appropriate.

Employees will not be retaliated or discriminated against for reporting of accidents, injuries, or illnesses, filing of safety-related complaints, or requesting to see injury and illness logs.

Mandated Reporting

Obligations of Mandated Reporters

MOST, IF NOT ALL EMPLOYEES OF WHISPERING WINDS ARE CONSIDERED MANDATED REPORTERS.

A list of persons whose profession qualifies them as “mandated reporters” of child abuse or neglect is found in California Penal Code Section 11165.7. The list is extensive and continues to grow. All persons hired into positions included on the list of mandated reporters are required, upon employment, to be provided with the statutes to reference Penal Code 11165.7; 11166 and 11167 and a statement, informing them that they are a mandated reporter and their obligations to report suspected cases of abuse and neglect pursuant to California Penal Code Section 11166.5.

All persons who are mandated reporters are required, by law, to report all known or suspected cases of child abuse or neglect. It is not the job of the mandated reporter to determine whether the allegations are valid. If child abuse or neglect is reasonably suspected or if a minor shares information with a mandated reporter leading him/her to believe abuse or neglect has taken place, the report must be made. No supervisor or administrator can impede or inhibit a report or subject the reporting person to any sanction.

Identification of Child Abuse and Neglect

Child abuse is more than bruises or broken bones. While physical abuse often leaves visible scars, not all child abuse is as obvious, but can do just as much harm. It is important that individuals working with and around children be able to know what constitutes child abuse or child neglect and know how to identify potential signs.

Child Abuse and/or Child Neglect Can Be Any of the Following:

- A physical injury inflicted on a child by another person other than by accidental means.
- The sexual abuse, assault, or exploitation of a child.
- The negligent treatment or maltreatment of a child by a person responsible for the child’s welfare under circumstances indicating harm or threatened harm to the child’s health or welfare. This is whether the harm or threatened harm is from acts or omissions on the part of the responsible person.
- The willful harming or endangerment of the person or health of a child, any cruel or inhumane corporal punishment or any injury resulting in a traumatic condition.

One does not have to be physically present or witness the abuse to identify suspected cases of abuse, or even have definite proof that a child may be subject to child abuse or neglect. Rather, the law requires that a person have a “reasonable suspicion” that a child has been the subject of child abuse or neglect. Under the law, this means that it is reasonable for a person to entertain a suspicion of child abuse or neglect, based upon facts that could cause a reasonable person, in a like position, drawing, when appropriate, on his or her training and experience, to suspect child abuse or neglect.

Red flags for abuse and neglect are often identified by observing a child’s behavior at school, recognizing

physical signs, and observations of dynamics during routine interactions with certain adults. While the following signs are not proof that a child is the subject of abuse or neglect, they should prompt one to look further.

Warning Signs of Emotional Abuse in Children:

- Excessively withdrawn, fearful, or anxious about doing something wrong.
- Shows extremes in behavior (extremely compliant or extremely demanding; extremely passive or extremely aggressive).
- Doesn't seem to be attached to the parent or caregiver.
- Acts either inappropriately adult-like (taking care of other children) or inappropriately infantile (rocking, thumb-sucking, throwing tantrums).

Warning Signs of Physical Abuse in Children:

- Frequent injuries or unexplained bruises, welts, or cuts.
- Is always watchful and "on alert" as if waiting for something bad to happen.
- Injuries appear to have a pattern such as marks from a hand or belt.
- Shies away from touch, flinches at sudden movements, or seems afraid to go home.
- Wears inappropriate clothing to cover up injuries, such as long-sleeved shirts on hot days.

Warning Signs of Neglect in Children:

- Clothes are ill-fitting, filthy, or inappropriate for the weather.
- Hygiene is consistently bad (unbathed, matted and unwashed hair, noticeable body odor).
- Untreated illnesses and physical injuries.
- Is frequently unsupervised or left alone or allowed to play in unsafe situations and environments.
- Is frequently late or missing from school.

Warning Signs of Sexual Abuse in Children:

- Trouble walking or sitting.
- Displays knowledge or interest in sexual acts inappropriate to his or her age, or even seductive behavior.
- Makes strong efforts to avoid a specific person, without an obvious reason.
- Doesn't want to change clothes in front of others or participate in physical activities.
- A sexually transmitted disease (STD) or pregnancy, especially under the age of fourteen.
- Runs away from home.

Reporting Child Abuse or Neglect

All persons who are mandated reporters are required, by law, to report all known or suspected cases of child abuse or neglect. It is not the job of the mandated reporter to determine whether the allegations are valid. If child abuse or neglect is reasonably suspected or if a minor shares information with a mandated reporter leading him/her to believe abuse or neglect has taken place, the report must be made. No supervisor or administrator can impede or inhibit a report or subject the reporting person to any sanction.

Volunteers, while not mandated reporters, should also be encouraged to report any suspected cases of abuse and neglect. Additionally, volunteers are highly encouraged by the law to have training in the identification and reporting of child abuse and neglect. The training offered online to mandated reporters, is equally available to volunteers.

Community members have an important role in protecting children from abuse and neglect. While not mandated by law to do so, if child abuse or neglect is suspected, a report should be filed with qualified and experienced agencies that will investigate the situation. Examples of these agencies are listed below. Parents and guardians of pupils have the right to file a complaint against anyone they suspect has engaged in abuse or neglect of a child. **Community members do not need to provide their name when making a report of child abuse or neglect.**

To make a report, an employee must contact an appropriate local law enforcement or county child welfare agency, listed below. This legal obligation is not satisfied by making a report of the incident to a supervisor. An appropriate law enforcement agency may be one of the following:

- A Police or Sheriff's Department (not including a school district police department or school security department).
- A County Probation Department, if designated by the county to receive child abuse reports.
- A County Welfare Department/County Child Protective Services.

The report should be made immediately over the telephone and should be followed up in writing. The law enforcement agency has special forms for this purpose that they will ask you to complete. If a report cannot be made immediately over the telephone, then an initial report may be made via e-mail or fax. Only the above entities, should investigate child abuse allegations, or attempt to contact the person suspected of child abuse or neglect.

Rights to Confidentiality and Immunity

Mandated reporters are required to give their names when making a report. However, the reporter's identity is kept confidential. Reports of suspected child abuse are also confidential. Mandated reporters have immunity from state criminal or civil liability for reporting as required. This is true even if the mandated reporter acquired the knowledge, or suspicion of the abuse or neglect, outside his/her professional capacity or scope of employment.

Consequences of Failing to Report

A person who fails to make a required report is guilty of a misdemeanor punishable by up to six months in jail and/or up to a \$1,000 fine (California Penal Code Section 11166[c]).

After the Report is Made

The local law enforcement agency is required to investigate all reports. Cases may also be investigated by Child Welfare Services when allegations involve abuse or neglect within families.

Child Protective Services

The Child Protective Services (CPS) is the major organization to intervene in child abuse and neglect cases in California. Existing law provides for services to abused and neglected children and their families. More information can be found at Child Protective Services.

Additional Training Encouraged

Additional training can be found at:

<https://mandatedreporterca.com/training/general-training>

“Zero Tolerance” Sexual Abuse and Molestation Policy

Whispering Winds prohibits and does not tolerate sexual abuse in the workplace or in any camp-related activity. Whispering Winds provides procedures for employees, volunteers, family members, victims of sexual abuse or others to report sexual abuse and disciplinary penalties for those who commit such acts.

Whispering Winds has a zero-tolerance policy for any sexual abuse committed by an employee, volunteer, or third party. Following any report of potential sexual abuse, Whispering Winds will initiate an appropriate investigation. Upon completion of the investigation, disciplinary action up to and including termination of employment and criminal prosecution may ensue, if warranted.

Sexual abuse is broadly defined and “includes any sexual activity with a child where consent is not or cannot be given. This includes sexual contact that is accomplished by force or threat of force, regardless of the age of the participants, and all sexual contact between an adult and a child, regardless of whether there is deception or the child understands the sexual nature of the activity. The sexually abusive acts may include; sexual penetration, sexual touching or molestation, sexual injury or non-contact sexual acts such as exposure or voyeurism, and sexual exploitation.”

Code of Practice and Procedures

Whispering Winds has taken steps to educate staff about the risk related to child sexual abuse, instituted policies and practices designed to protect children from the risk of child sexual abuse and trained our staff and volunteers about proper reporting procedures. This policy is reviewed and signed off on annually with all staff.

Some, but not all of the physical and behavioral evidence or signs that someone is being sexually abused are listed below:

Physical evidence of abuse:

- Difficulty in walking
- Torn, stained or bloody underwear
- Pain or itching in genital area
- Bruises or bleeding of the external genitalia
- Sexually transmitted diseases

Behavioral signs of sexual abuse:

- Reluctance to be left alone with a particular person
- Wearing lots of clothes especially in bed
- Fear of touch
- Nightmares or fear of night
- Apprehension when sex is brought up

Designated Person

Although everyone has a role to play in ensuring that children are safe, Whispering Winds has designated the Human Resources Manager as the executor for this policy. This designated person has specific responsibility for implementing the policy, and acts as the point of contact to receive information and advice from Children's Services and Law Enforcement.

The designated person's general terms of reference include:

- Maintaining an up to date policy and procedures manual.
- Ensuring that relevant staff and/or volunteers are aware of and follow the procedures, including implementing safe recruitment procedures.
- Conduct and document annual training.
- Advising the leadership team on safeguarding and child protection issues.
- Maintaining contact details for local Children's Services and Police.
- If there is a concern, the designated person would:
 - Be the first point of contact for any concerns or allegations, from children or adults, ensuring that confidentiality is maintained in all cases.
 - Decide on the appropriate action to be taken, in line with the organization's procedures and in conjunction with the person in charge.

The designated person may be contacted by phone, via email, or in person.

Reporting Procedures

As you were made aware during the hiring process, according to California Law, you are considered a **Mandated Reporter** and have certain reporting obligations under Section 11166 and confidentiality rights under subdivision (d) of Section 11167 of the California Penal Code.

Included in your California documents you received upon employment are copies of Sections 11165.7, 11166, and 11167 of the California Penal Code. Additional information regarding your obligations as a Mandated Reporter can be found in the Employee Manual. You are also strongly encouraged to complete training provided by the State of California at:

<https://mandatedreporterca.com/training/general-training>

If you are aware of or suspect sexual abuse is taking place, you must immediately report it to your immediate supervisor or member of the Whispering Winds Leadership Team.

Whispering Winds will report any incidents of potential sexual abuse to the appropriate authorities and their insurance agent.

Investigation and Follow up Procedures

Whispering Winds will take all allegations of sexual abuse seriously and will promptly and thoroughly investigate whether sexual abuse has taken place. Whispering Winds may use an outside third party to conduct an investigation. Whispering Winds will cooperate fully with any investigation conducted by law enforcement or other regulatory agencies. It is Whispering Winds' objective to conduct a fair and impartial investigation. Whispering Winds provides notice that they have the option of placing the accused on leave of absence or on a re-assignment to a non-child contact area.

Whispering Winds will make every reasonable effort to keep the matters involved in the allegation as confidential as possible while still allowing for a prompt and thorough investigation.

Anti-Retaliation Statement

Whispering Winds prohibits retaliation made against any employee or volunteer who reports a good faith complaint of sexual abuse or who participates in any related investigation. Making false accusations of sexual abuse in bad faith can have serious consequences for those who are wrongly accused. Whispering Winds prohibits making false and/or malicious sexual abuse allegations, as well as deliberately providing false information during an investigation. Anyone who violates this rule is subject to disciplinary action, up to and including termination.

Staff Expectations

- It is the immediate supervisor's responsibility to monitor day-to-day relationships with campers and their employees, on and off premises.
- Being alone with children – At no time should staff be in a situation where they are alone with a child or children and cannot be observed by others. Whispering Winds will make every attempt to design and structure its programs to eliminate the potential for a staff member to be in a one-on-one situation. Camp staff members are not to have children enter closets or storage areas to retrieve equipment.
- Hugging and touching of children – Appropriate physical contact is important in the emotional development of all children and children at different developmental levels will need differing degrees of physical contact. Therefore, staff members should not perform frontal hugs of children – hugs should be from the side. The staff member should get down to the child's physical level when possible. Staff should not touch children in any body location that would be covered by a bathing suit. Staff members should not pick-up school-aged children (to reduce potential for both abuse allegations and physical injury) and should not allow children to sit on their laps.
- Supervision standards – All children who are registered into programs will be supervised by camp staff at all times. At no time should one staff member have direct care of a single child. If a staff member becomes alone with a child, s/he should promptly move to a location where s/he can be observed by other camp staff members.

Photography

Publishing articles and photos in Camp newsletters, websites, local newspapers etc. is an excellent way of recognizing young people's achievements and of promoting your organization and recreation as a whole. However, it is important to minimize the risk of anyone using images of children in an inappropriate way. Digital technology makes it easy to take, store, send, manipulate and publish images.

- Whispering Winds standard waivers include a consent photography consent form.
- Any photographer or member of the press or media attending an event should wear identification at all times and should be fully briefed in advance on your expectations regarding his/her behavior and the issues covered by these guidelines.
- Do not allow a photographer to have unsupervised access to young people at the event or to arrange photo sessions outside the event.
- Care must be taken in the storage of and access to images.
- When publishing images, make sure they are appropriate and that you do not include any information that might enable someone to contact the child.
- It is preferable to use a general shot showing participants, or a group shot without identifying them by name.
- If you are recognizing the achievement of an individual and wish to publish their name with their photo, DO NOT publish any other information (e.g. where they live, name of school, other hobbies and interests) that would enable someone to contact, befriend or start to 'groom' the child.
- Ensure that the young people pictured are suitably dressed, to reduce the risk of inappropriate use.
- The use of cameras or camera phones in changing areas should not be permitted in any circumstances. Such use by young people should be regarded as a form of bullying.

Websites and Social Media

When promoting Whispering Winds and encouraging your members to interact through a website or social network such as Facebook, there are a few issues to bear in mind in relation to children and young people:

- follow the guidelines on the use of images of children (see Photography section above)
- ensure that the content and language on your site or page, including contributions to blogs, forums etc., is not inappropriate for younger visitors and does not link directly to unsuitable material on other sites
- provide a clear process for parents and others to report inappropriate content or online bullying and to request that content is removed have a robust procedure for handling and assessing such a report or request and acting promptly to remove the offending content.

ACKNOWLEDGING RECEIPT AND UNDERSTANDING OF SEXUAL ABUSE POLICY

I acknowledge that I have received and read the sexual abuse policy and/or have had it explained to me. I understand that Whispering Winds will not tolerate any employee, volunteer, or third party who commits sexual abuse. Disciplinary actions will be taken against those who are found to have committed sexual abuse.

I understand:

- (1) that it is my responsibility to abide by all rules contained in this policy,
- (2) how to report incidents of sexual abuse as set forth in the abuse policy,
- (3) that I shall not retaliate against any employee/volunteer or other exercising his or her rights under this policy,
- (4) that I shall not make false and/or malicious sexual abuse allegations, or deliberately provide false information during an investigation, and
- (5) that violation of this policy can lead to disciplinary action by Whispering Winds, up to and including termination of employment.

Print Name

Date

Signature

Termination

Involuntary Termination and Progressive Discipline

Violation of Whispering Winds Catholic Conference Center, Inc. policies and rules may warrant disciplinary action. The Company has a system of progressive discipline that may include verbal warnings, written warnings and suspension. The system is not formal, and the Company may, in its sole discretion, utilize whatever form of discipline is deemed appropriate under the circumstances, up to, and including, immediate termination of employment. The Company's policy of progressive discipline in no way limits or alters the at-will employment relationship.

Voluntary Resignation

Voluntary resignation results when an employee voluntarily quits his or her employment at Whispering Winds Catholic Conference Center, Inc., or fails to report to work for three consecutively scheduled workdays without notice to, or approval by, his or her supervisor. All Company-owned property, including vehicles, keys, uniforms, identification badges, and credit cards, must be returned immediately upon termination of employment.

Employee Handbook Acknowledgement

Employee Handbook Acknowledgement

I acknowledge receipt of the Company's employee handbook. I agree to read the handbook and to follow the guidelines and policies set forth in the handbook and any amendments to the handbook along with the other policies and procedures of the Company.

I understand that I am not being hired for any definite period of time even though my wages are paid regularly. I further understand that I am an at-will employee and my employment can be terminated at any time, with or without cause and with or without prior notice either by the Company or myself. No promises or representations have been made to me that I can be disciplined or discharged from my employment with the Company only under certain circumstances or after certain events.

I am aware that the contents of the employee handbook are presented as a matter of information and that except for the at-will provisions, the handbook can be amended at any time. I realize that nothing in this handbook is intended to infringe upon my rights under Section 7 of the National Labor Relations Act (NLRA). Additionally, I am hereby made aware that under the Defend Trade Secrets Act I may not be held criminally or civilly liable under federal or state trade secret laws if I disclose a trade secret to a government official or attorney solely for the purpose of reporting or investigating a violation of law, or in a complaint or document filed in a lawsuit, if that filing is made under seal.

I understand and agree that the handbook is for informational purposes only and is not intended to create a contract, nor is it a contract of employment or continuing employment between myself and the Company. I also understand that neither the handbook nor any policy of the Company is a guarantee or promise of employment or continuing employment. I am aware that Company policy requires employees to be hired at-will and this policy cannot be changed by any oral modifications. My at-will employment status with the Company has been fully explained and I have been given an opportunity to ask questions regarding Company policies and my at-will employment status.

Whispering Winds Catholic Conference Center, Inc. reserves the right to change my hours, wages, and working conditions at any time. I understand and agree that other than the Executive Director of the Company, no manager, supervisor, or representative of the Company has authority to enter into any agreement, express or implied, for employment for any specific period of time, or to make any agreement for employment other than at-will; only the Executive Director has the authority to make any such agreement and then only in writing, signed by the Executive Director.

Employee's Signature _____

Employee's Printed Name _____

Date _____

Addendum

Modified 9/1/2021: Mandated Reporting

Modified 10/24/2022: "Zero Tolerance" Sexual Abuse and Molestation Policy

Modified 11/3/2022: Addendum

Modified 01/22/2025: Crime Victim Leave, Pregnancy Disability Leave