

OUR MISSION

We are a national non-profit organization committed to reducing substance abuse and co-occurring mental health problems through effective and efficient treatment programs.

OUR VISION

We will be the nation's leading treatment provider, helping create access to affordable high-quality healthcare for substance abuse and mental health treatment for all who need it.

OUR CORE VALUES

These values represent who we are and how we pursue our mission ...

- *Our cause is to help people reclaim their lives. We help the people who need us most, especially those without resources. We are invigorated by making a difference.*
- *We respect each other, our clients, and our communities in everything that we do.*
- *We adhere to the highest standards of integrity and business ethics. We strive to be role models for the clients and communities we serve.*
- *We are disciplined about maintaining financial strength. Our stability helps us offer a future to more people in need of treatment.*
- *We are committed to pioneering innovative solutions to meet the ever changing needs of our clients. We enjoy stretching ourselves to learn and grow.*
- *We build lasting partnerships with our clients, payers and referral sources.*
- *We believe in the power of diversity and celebrate differences. The diversity of our staff, clients and Board members helps us achieve our mission.*

REAL ANSWERS FOR LASTING RECOVERY SINCE 1968

Gateway Foundation is a powerful voice and national leader in the fight against alcohol and other drug addiction. For more than 40 years, we have been at the forefront, providing innovative, cost-effective, community-based treatment services and pioneering treatment in correctional institutions. Gateway employs approximately 1,000 people nationwide.

We trace our beginnings to 1968 when the name “Gateway Houses Foundation” was officially recorded with the Cook County Recorder’s Office in Chicago. Gateway’s initial focus was adult residential treatment programs, with Cregier and Ellis Houses in Chicago opening in June and November 1968, respectively.

The early 1980s were a period of growth and expansion for Gateway. We developed programs for new populations seeking treatment, such as corrections and adolescents. The first of Gateway’s four residential adolescent treatment programs opened in Lake Villa, Illinois in November 1985. The original 25-bed program would later be expanded with the opening of the Lake Villa Adolescent Center. Treatment in the Illinois corrections arena began during this time as well, eventually encompassing services for both men and women.

Gateway opened its first Texas program at Jester I Correctional Facility under a contract with the Texas Department of Criminal Justice (TDCJ) in October 1992. Since then our Texas programs have expanded to encompass numerous corrections facilities.

Expansion into states beyond Illinois and Texas began in the summer of 1994 with St. Louis Free & Clean, also known as St. Louis Outpatient, the first of several Missouri programs to come. Gateway expanded eastward in 2002, offering treatment services in several New Jersey correctional institutions. And in 2004, we broadened our east coast presence through a partnership with the state of Delaware to provide community-based treatment on a state-owned campus.

In 2008, Gateway began offering services at its Illinois community programs to those with insurance or the ability to self-pay. With this initiative, Gateway’s mission has expanded to incorporate individuals from all walks of life who are in need of treatment, supporting our vision to be the provider of choice.

While specific programs have come and gone, Gateway’s mission to change lives has not. The 26,000+ individuals who participate in a Gateway program each year are a tribute to our committed staff and dedicated board of directors. Together, we will continue to serve those in need and help change our communities one at a time.



Welcome to Gateway Foundation!

On behalf of the entire Gateway organization, I am pleased that you have chosen to join our team of professionals, and just as pleased that you have decided to commit yourself to our mission. The work we do is important and the services we provide are life changing.

We couldn't do it without people like you. At Gateway, we take great pride in our employees – who you are, what you do and why. So I encourage you to share your thoughts and ideas. Our reputation for leadership in substance abuse treatment is the result of the best efforts of all of us working together.

As part of your *Bright Beginnings* onboarding with Gateway, this Employee Guide will help you become more familiar with our organization and answer questions you may have about our policies and procedures. It has been designed to help you understand our philosophy, objectives and commitment to the highest standards in serving our clients and working with each other. We have also included basic information about employee benefits that may be available to you.

Please bear in mind that the content of this Guide is subject to change. Gateway reserves the right to change, interpret, withdraw or add to any of the policies in this Guide, at its sole discretion. We will, however, endeavor to provide our employees with notice prior to enactment of new or revised policies. This Guide supersedes all prior Guides, policies and practices.

If you have any questions, please ask your supervisor. Or feel free to contact Human Resources. After you have reviewed the Guide, please sign the Employee Acknowledgment Form included in the back and return it to your supervisor.

In the meantime, welcome! I look forward to working with you and trust your experience with Gateway will be a rewarding one.

Sincerely,

Michael Darcy
President and Chief Executive Officer

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THE BASICS

WHO WE ARE AND WHAT WE DO

Gateway Foundation, Inc. is a Chicago-based not-for-profit organization committed to providing real answers to alcohol and other substance abuse as well as the treatment of the frequently co-occurring mental health disorders.

We serve individuals regardless of their ability to pay with community-based residential and outpatient substance abuse treatment services in both Delaware and Illinois – and in Illinois, it's something we've been doing since 1968. Additionally, we pioneered the delivery of treatment services in correctional institutions and currently provide services to corrections clients in Illinois, Missouri, New Jersey and Texas.

Each year, we help more than 26,000 adult and adolescent clients build and maintain productive, socially responsible and healthy lives.

A leader then...A leader now

Over the years, Gateway has earned a reputation for innovation, effectiveness and cost efficiency in treatment.

Why? Because our goal is simple: to make sure people get the treatment, guidance, and support necessary to achieve lasting recovery and become productive citizens in the community.

How? Our programs are designed to succeed with adults and adolescents from all walks of life, including those who have a mental illness. We provide individualized care including residential substance abuse treatment and outpatient support programs to meet the unique needs of those who seek help, as well as their families.

Gateway's committed staff and board of directors forge treatment partnerships with insurance companies, employee assistance programs, government agencies, political leaders, law enforcement and social service organizations to respond to the ever-changing needs of persons seeking treatment. Additional financial support is provided by generous contributions from civic and business communities, along with individual donors.

The work we've done has earned us numerous awards, along with accreditation from The Joint Commission. We also strive to educate policy makers and the public about major issues related to substance abuse, addiction and treatment, and to act as advocates urging adoption of comprehensive treatment programs.

RESOURCES FOR YOU

Of course you want to know more about Gateway, and how you fit in. That's part of what we consider your new employee onboarding, or *Bright Beginnings* with Gateway. You'd like to understand "how we do things around here" and preview the benefits we provide our employees. The two best resources for you are this Employee Guide and your supervisor.

The Gateway Employee Guide

This Guide presents a summary of policies, procedures and practices that are important to you as a Gateway employee. Specific topics are outlined in the Table of Contents and in the Index at the end of the Guide. The information we are providing is as complete and current as reasonably possible. However, what is presented is not all-inclusive. Except for the employment-at-will policy described in the last paragraph of this section, Gateway senior management may make changes to policy and/or practice at any time by adding, deleting, revising or totally revoking any existing policies, practices and procedures, without prior notice.

If you have access to previous guides, please discard them. The information contained in this Guide replaces any and all prior oral or written representations or statements regarding personnel policies, practices and procedures.

This Guide presents policies, procedures and practices that are important to you as a Gateway employee.

As you read through the pages that follow, please be advised that we take our policies and procedures seriously. Violation of any policy may result in corrective action up to, and including, immediate termination of your employment. Final interpretation of any policy, practice or procedure is at the discretion of senior management.

We also want you to remember that this Guide does not constitute any commitment of employment. Neither does it create any express or implied contract rights. You, along with all Gateway employees, are employed at-will, meaning that either you or Gateway may terminate your employment relationship at any time, with or without cause.

Your supervisor as your first resource

If you have questions about the Guide, or your employment with Gateway, your supervisor is your best resource. He or she is also available to discuss any work-related issue or concern with you – confidentially and objectively.

If you still have questions, please contact Human Resources.

WHAT WE EXPECT OF YOU

As a Gateway employee, you are a representative of our organization, and that carries with it a significant responsibility. Gateway has certain basic expectations of all our employees, along with the policies, procedures and practices we have established to guide your work with us. We believe you are capable of meeting our expectations and making a significant contribution to the work of Gateway Foundation.

A positive, team-oriented atmosphere is essential to a productive and satisfying work experience.

Key among our expectations is that you will conduct yourself as a professional and adhere to Gateway's Code of Conduct, described in greater detail later in this Guide.

We also expect you to cooperate and collaborate with your co-workers and to treat them, as well as your supervisor, with respect and trust. A positive, team-oriented atmosphere is essential to a productive and satisfying work experience. Our ability to work well together is an integral reason Gateway has continued to grow and succeed over the years, and we want to continue that success.

As you approach your work each day, we expect that you will keep Gateway's mission in mind. If you work directly with clients, remember that they will look to you as a role model, relying on your integrity and ability to lead them on a path to a better life. Our expectation is that you will not abuse that trust. If you work in a non-clinical role, remember that your efforts directly support our mission and provide the infrastructure that's critical for optimum client care. Our expectation is that you will give your work the creativity and attention to detail it requires.

It will come as no surprise, then, that we further expect you to protect Gateway's reputation at all times. This involves conducting your personal life in a manner that does not adversely affect the organization's reputation. For example, we assume you will be able to separate your political and other personal activities from Gateway business.

We depend on each of you to be committed to doing your best every day at work. Your co-workers count on you to be at work, on time, and to be fit for duty – both mentally and physically. With each of us living up to that expectation, we cannot help but succeed in advancing Gateway's mission!

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EMPLOYMENT POLICIES & PRACTICES

POLICIES: *What we stand for*

Gateway Foundation believes in and is firmly committed to a policy that assures equal employment opportunity for all employees. That is, we are an equal opportunity employer. We are also committed to a work environment that is fair, just, physically and emotionally safe and drug free. We have zero tolerance for violence, harassment and discrimination.

We believe workforce diversity is essential to our growth and long-term success.

EQUAL EMPLOYMENT OPPORTUNITY

At Gateway, we believe our organization and clients have benefited from a diverse team of talented employees. In fact, we believe workforce diversity is essential to our growth and long-term success. By valuing differences among people, we can maximize the skills, knowledge and abilities needed to continuously improve existing processes, along with the services we provide.

Gateway provides equal employment opportunity to all employees and all applicants for employment.

No discrimination

Providing equal employment opportunities means that no applicant or employee of Gateway will be discriminated against on the basis of race, color, religion, sex, sexual orientation, national origin, ancestry, citizenship status, marital status, age, disability, covered veterans' status, or any other protected group status under federal, state or local law.

Gateway also gives consideration to all qualified individuals with disabilities and affords all employees and applicants opportunities for advancement according to their individual abilities without regard to any disability. We do not permit discrimination: no opportunity for hire, advancement or any other condition of employment will be diminished through discriminatory practices. Similarly, in accordance with applicable law, we reasonably accommodate qualified individuals with disabilities.

Discrimination against employees or applicants for employment for any of these reasons is strictly prohibited and may result in corrective action.

PROHIBITION OF DISCRIMINATION AND HARASSMENT

Sexual Harassment

Gateway Foundation does not tolerate sexual harassment. While some persons may make sexual comments, jokes or personal advances without intending harm, such actions can be unwanted. They may also be perceived as threatening or harassing.

For purposes of this policy, sexual harassment is defined as any type of sexually oriented conduct, whether intentional or not, that is unwelcome and either:

- *is implied or stated to be a term or condition of employment or a factor in evaluating the individual's job performance, eligibility for promotion or any other component of employment, or*
- *interferes directly or indirectly with an individual's work performance by creating a hostile, offensive or intimidating environment.*

Inappropriate behavior that may constitute sexual harassment includes, but is not limited to:

- *Sexual jokes, language, epithets, advances or propositions*
- *The display of sexually suggestive objects, pictures, magazines, posters or cartoons*
- *Comments about an individual's body, sexual orientation, sexual prowess or sexual deficiencies*
- *Asking questions about sexual conduct*
- *Touching, leering, whistling, brushing against the body or suggestive, insulting or obscene comments or gestures*
- *Demanding sexual favors in exchange for favorable reviews, assignments, promotions, continued employment or promises of the same.*

Other Harassment

Other kinds of comments, jokes or personal advances may also be unwanted, threatening and perceived as harassment – even though no harm is intended. For purposes of Gateway policy, harassment is defined as verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his or her race, color, religion, gender, national origin, age, disability, covered veterans' status or any other legally protected group or that of his or her relatives, friends or associates – and has the purpose or effect of:

- *creating an intimidating, hostile or offensive environment*
- *otherwise adversely affects an individual's employment opportunities*
- *unreasonably interfering with an individual's work performance*

Harassing conduct includes, but is not limited to, the following:

- *epithets, slurs, negative stereotyping or threatening, intimidating or hostile acts that relate to race, color, religion, gender, national origin, age, disability or any other legally protected category*
- *written or graphic material that is placed on walls, bulletin boards or elsewhere on Gateway's premises or circulated in the workplace – material that denigrates or shows hostility or aversion toward an individual or group because of an individual's protected classification.*

Procedures for reporting cases of perceived harassment

If you believe you have been harassed, or are currently being subjected to harassment of any kind, by a manager, supervisor, coworker, customer, vendor or other person – whether it's based on sex, sexual orientation, race, color, religion, age, national origin, covered veteran status, disability or other protected group status – you should take the following steps as soon as possible:

1. *If you feel comfortable confronting the person who is doing the harassing, state how you feel about this person's actions and politely request that he or she stop the unwanted behavior because you feel offended, uncomfortable or intimidated.*
2. *If the harassment continues, or if you believe some harm may result from speaking directly to the individual, inform your supervisor or manager.*
3. *If you're unable to reach your supervisor or manager, or if your complaint involves your supervisor or manager, take your complaint to your Vice President, or the Employee Relations Officer. Similarly, if you fail to solve your problem by talking with your supervisor or manager, you should discuss the situation with your Vice President, or the Employee Relations Officer.*

When you have made your concerns known, you can be assured that all complaints will be handled in as confidential a manner as possible. When necessary, Gateway will conduct an investigation. If the investigation reveals a violation of company policy, appropriate corrective action will be taken. You will be promptly notified of the result of the investigation.



Protection against retaliation

Retaliation is a serious violation of Gateway policy and should be reported immediately to your Vice President or the Employee Relation Officer. Retaliation against any individual for reporting harassment, discrimination or other unlawful conduct will not be tolerated and may subject the wrongdoer to corrective action. Individuals who are not themselves complainants, but who assist in a harassment investigation, are also protected from retaliation.

Addendum for Illinois employees

Any employee who feels he/she has been subjected to unlawful harassment may also file a charge of discrimination in writing with the Illinois Department of Human Rights within 180 days of the harassment. That charge will be investigated and, if there is substantial evidence that sexual harassment has occurred, a complaint will be issued with the Illinois Human Rights Commission.

The Department of Human Rights can be contacted at:

State of Illinois
Department of Human Rights
State of Illinois Center
100 West Randolph, Suite 10-100
Chicago, Illinois 60601
312-814-6200

The Human Rights Commission can be contacted at:

State of Illinois
Human Rights Commission
State of Illinois Center
100 West Randolph, Suite 5-100
Chicago, Illinois 60601
312-814-6269

DRUG-FREE WORKPLACE

Gateway is committed to providing a safe, alcohol- and drug-free working environment. As such, we do not permit any Gateway employee at any location to:

- 1. possess, use, sell, offer to sell or distribute alcoholic beverages or illegal drugs*
- 2. be under the influence of alcohol or illegal drugs*
- 3. misuse, abuse or use excessively any drug, whether legal or illegal.*

In addition, we hold the same alcohol- and drug-free standard for any Gateway employee on Gateway business, wherever that may be. Besides being dangerous for you, your co-workers and our clients, using and/or selling drugs is against the law.

We also consider it a serious breach of our mutual concern for safety and Gateway policy if you...

- *refuse to submit to drug/alcohol testing, discussed below*
- *refuse to cooperate with personnel conducting the test, discussed below*
- *are convicted of any violation of any criminal drug statute*
- *refuse to comply with Employee Assistance Program (EAP) recommendations regarding treatment*
- *violate the “under the influence” of alcohol or drugs provisions, as defined below.*

Any violation of our alcohol- and drug-free workplace policy may result in your release from employment, if you are the offending employee, or rejection of any individual applying for a Gateway job.

Definition of terms

To be clear about the meaning and intent of our alcohol- and drug-free workplace policy, here are some key definitions:

1. *“Drugs” means both legal and illegal drugs.*
2. *“Illegal Drugs” refers to any drug which...*
 - a. *is not legally obtainable,*
 - b. *is legally obtainable but has not been legally obtained, or*
 - c. *has been legally obtained, but not used in the manner and for the purpose for which it was prescribed or manufactured.*
3. *“Legal Drugs” are prescription drugs and over-the-counter (OTC) drugs which have been legally obtained and used in the manner for which they were prescribed, by the person for whom they were prescribed.*
4. *“Medical Facility” is any physician’s office, laboratory, clinic, hospital or other similar facility.*
5. *“Possess” means to have alcohol or drugs either in or on your person, personal effects, desk, files or similar area.*
6. *“Location” and “Property” are any building, office, warehouse, common area, vehicle, parking lot or similar area owned, leased, managed, used or controlled by Gateway or by any organization for which Gateway provides services or products.*

7. *“Gateway Business” refers to all time when you are engaged in work duties or subject to the control of Gateway. It also includes scheduled breaks, travel from one workplace to another and time spent at a vendor’s location.*
8. *“Under the Influence,” refers to those situations...*
 - a. *when, used in connection with drugs, you are affected by a drug(s) in any discernable manner or have any illegal drug(s) in your body.*
 - b. *when, used in connection with alcohol or alcoholic beverages, you are affected by alcohol in any discernable manner or have a detectable amount of alcohol in your body.*
9. *“Reasonable Suspicion” means any set of facts and circumstances that would lead a reasonable person to believe that you are in violation of our alcohol- and drug-free workplace policy. It may be based on one or more of the following factors:*
 - *first-hand observation of a drug or alcohol violation*
 - *possession of alcohol or illegal drugs or related paraphernalia*
 - *information from public record or court proceedings*
 - *statements by you or witnesses*
 - *your appearance, behavior, speech or body odor – any of which may be manifested by factors including, but not limited to, bloodshot eyes, slurred speech, alcohol on the breath, inability to walk a straight line or perform simple acts of physical dexterity, poor coordination, accidents, odors in your immediate area, physical or verbal altercation, unexplained absence from work area or unusual behavior*
 - *any other reliable information or physical evidence of alcohol or drug use.*
10. *“Work-Related Cause” means 1) you have incurred a work-related injury requiring medical attention at a medical facility, 2) you have caused the injury of another person on Gateway premises or during working time, 3) you have caused damage to Gateway-owned or -leased property or 4) you have committed repeated and/or flagrant violations of safety standards.*

Gateway is committed to providing a safe, alcohol- and drug-free working environment.

Use of legal drugs

We realize that sometimes you may need to take a medication prescribed by a physician or an OTC drug for a specific illness, allergy, cold or other condition. Or you may need to be on a regimen of drugs for a chronic health problem. If this is the case, and you will be under the influence of such a legal drug while you are at work, you are expected to report your use of it to your supervisor if it might interfere with your ability to do your job.

It is up to you to determine whether the legal drug you are taking might have a negative effect on your job performance. That is, it's your responsibility, not Gateway's. It might be wise, for example, to ask your doctor about side effects of the drug you are taking. Again, the safety of your co-workers and our clients is at stake. Failure to declare the use of such legal drugs may result in corrective action.

Testing of employees

Upon reasonable suspicion and/or randomly, you may be required to submit to alcohol and/or drug testing. Either way, the testing will be conducted at a facility selected by Gateway – at our expense. You will be required to sign a consent form and provide a suitable blood, urine, breath or other sample, as directed by the facility staff. Failure to comply with these requirements will result in immediate release from employment.

If you believe you have an alcohol or drug abuse problem, it is your responsibility to seek diagnosis and treatment. Our EAP can help.

If you need help

If you believe you have an alcohol or drug abuse problem, it is your responsibility to seek diagnosis and treatment – for your own health and well-being. We also hope you will seek help before it affects your performance or conduct at work.

The Employee Assistance Program (EAP) is available to you and other Gateway employees as a resource for diagnosis and treatment for alcohol/drug use.

WORKPLACE SECURITY & SAFETY

Safety and security are high priorities at Gateway, meaning we are committed to a workplace that is safe and free from danger. We must all be attentive to the safety and well-being of co-workers and clients. Similarly, we need your help in assuring Gateway property, equipment and assets are protected, safe and secure.

Some of our locations and areas have restricted access at specified hours. Security procedures for your facility will be covered during your orientation. We ask that you report any security-related incidents promptly to your supervisor, or other appropriate personnel, so proper action can be taken.

‘Zero Tolerance’ for workplace violence

Gateway Foundation does not tolerate acts of workplace violence committed by or against employees, clients or visitors. This includes any verbal or physical conduct that harasses, disrupts or interferes with another person’s work performance or that creates an intimidating, offensive or hostile environment. Violations of this policy will result in corrective action.

If you feel you have been, or may be a victim of any type of threat, harassment or violence, you should immediately report it to your supervisor or Human Resources for further investigation.

No weapons

Gateway prohibits the use or possession of weapons of any type, including firearms, while you’re on Gateway property or engaged in Gateway business. Violating this prohibition will result in immediate termination.

‘Safety First’

At Gateway, we do our part to provide you with a safe and healthy place to work, and we count on you to perform your job responsibilities with a “Safety First” attitude each day.

As you exercise common sense and good judgment, we expect you to follow all safety and housekeeping rules and do everything you can to guard against and prevent injury to yourself, co-workers, clients and visitors. If you see or become aware of anything that could be a hazard or cause an accident, please report it immediately to your supervisor, regardless of how insignificant it may seem.

*We must all be attentive to the safety
and well-being of co-workers and clients.*

If you have concerns about the safety or quality of care provided by Gateway, you are encouraged to discuss the matter with your supervisor or manager. For Community Division staff, if you are not satisfied that your concerns have been addressed, you may contact The Joint Commission. No corrective action or retaliation will be taken against you or any employee who in good faith reports safety and/or quality of care concerns to The Joint Commission.

The Joint Commission may be contacted at:

The Joint Commission
One Renaissance Blvd.
Oakbrook Terrace, IL 60181
630-792-5000

Personal property

In addition to your physical safety and that of your co-workers and clients, you want to be sure the property you bring to work is safe. We consider it your personal responsibility to safeguard your personal property. Gateway is not responsible for the loss or theft of personal property brought onto our premises at any of our locations.

To prevent losses, we encourage you not to leave valuables unattended in your office, work area or desk. Remember to lock office doors and desks when unattended. And do not leave articles of personal value on site overnight.

EMPLOYMENT PRACTICES

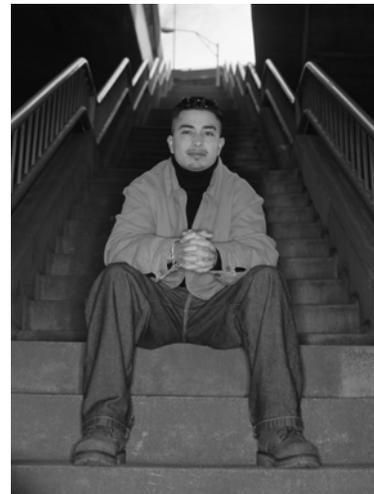
Employment at will

Your employment relationship at Gateway is an at-will relationship, which means you are free to end your employment with Gateway at any time and for any reason, with or without notice. Gateway is also free to end the employment relationship with you and others at any time, for any lawful reason, with or without notice. Exceptions to an at-will relationship must specify the type of employment relationship, such as contractual, in writing, and must be agreed upon and manually signed only by both an “employee” and the President of Gateway.

As has been previously stated, the policies outlined in this Guide are in effect for all employees, except for certain benefits which may not apply to part-time, temporary or on-call employees. The intent of the Guide is to serve as a guide to our policies and procedures. All of our policies, procedures and benefits are subject to change, but Gateway will inform you of any changes made. Gateway, at its discretion, reserves the right to withdraw or modify any provision described herein. Nothing in this Guide should be construed as creating any contract.

Credentialing

If you are in a job that requires you to be certified or licensed, according to Gateway policy, state law and/or contractual requirement, you are expected to attain and maintain the appropriate credentials for your job. If you do not attain or maintain your license or certification, you will be subject to demotion or be released from employment.



Employee Type

When you are employed to do a specific job at Gateway, your work fits into an employment category, which is determined by the number of hours you are scheduled to work and/or the duration of the position. The principal categories are:

Regular Full-time: *Position generally requires a work schedule of at least 37½ hours per week.*

Regular Part-time: *Position generally requires a work schedule of less than 37½ hours per week.*

Temporary: *Position is not expected to continue for more than one year.*

On-Call: *Position is not regularly scheduled for a specific number of hours.*

It is important to know your employee type as you review and determine which Gateway benefits apply to you.

Bright Beginnings

As part of your onboarding experience at Gateway, you will participate in our Bright Beginnings program. Bright Beginnings will give you an opportunity to learn more about Gateway, the organization, and how your role and responsibilities fit into our mission and goals. We want your experience with Gateway to be mutually rewarding and believe it's important for you to understand the initiative we expect from you as well. Bright Beginnings will help give structure to your early days with us, and ensure that our long-term relationship is collaborative and productive.

Introductory Period for New Employees

As you begin your employment with Gateway, we have arranged for an Introductory Period for you to learn about your job, get to know your co-workers and become familiar with your new surroundings. Normally this period lasts 90 calendar days, but it may be extended for up to 60 additional days by your supervisor and Human Resources, based on your circumstances and job performance. During your Introductory Period, you will be observed and evaluated by your supervisor to ensure that you know and meet the expected job standards. This is a good time to ask questions and get clarification on any issues that are important to you.

OPEN POSITIONS & JOB POSTING

After you've been with Gateway awhile, you may decide you're ready for new job challenges. As employees leave the organization or positions are added, a position may become open and be of interest to you. We encourage you to consider the possibilities.

*Open positions are available on our websites:
www.recovergateway.org or www.gatewaycorrections.org*

If you apply for an open position, you will be given consideration based on your qualifications, performance record and ability to perform the essential functions of the job. The final selection will be based on filling the open position with the best qualified candidate. While we prefer to hire from within, we reserve the right to recruit outside candidates for any job within the organization.

RE-EMPLOYMENT

If you decide to leave Gateway and then want to come back at a later date, we will consider reinstating or rehiring you if you performed your job satisfactorily while you worked here and left the organization under favorable circumstances.

Reinstatement

We can usually reinstate your length of service, accrual rates and previous participation in group benefit plans if you're re-employed within 30 days from your termination date.

Rehire

If you're re-employed after 30 days, you are considered rehired, and will generally be treated as a new hire with respect to service, accrual rates and benefits. Participation in the retirement plan may be reinstated in accordance with plan provisions. See your supervisor or Human Resources if you need more information.

EMPLOYEE REFERRAL PROGRAM

As a Gateway employee, you are a good source for new employees because you understand our philosophy, culture and job requirements. Gateway offers monetary incentives to eligible employees to encourage you to refer qualified friends and associates for potential employment. To be eligible, you must be an active, regular employee. Additional details are available from your supervisor.

We consider you and your co-workers a good source for new employees because you understand Gateway's philosophy, culture and job requirements.

ATTENDANCE

Dependable, timely and regular attendance from every employee is essential to Gateway's mission. Otherwise work does not get done, and we let our clients down. Understandably, working your scheduled work hours is a condition for continued employment.

Notification of absences and tardiness

We realize that you may need to miss work occasionally as a result of illness, personal emergencies or family emergencies. If you must be absent, or if you will be late in reporting to work, it is your responsibility to notify your supervisor and to do so according to the call-in procedures established by your program or department.

Normally, you're expected to call no later than two hours before your scheduled starting time. Early notification allows us to alter plans for the day and reschedule any appointments or meetings.

If you will be absent for successive days, you'll need to keep your supervisor informed on a daily basis, unless you have made prior arrangements about an extended absence.

Types of absence

It is a **scheduled absence** when you have requested time off at least 24 hours in advance from your supervisor and he or she has approved the absence. Please be advised that your request might not be approved due to business need.

An **unscheduled absence** occurs when you fail to report to work as scheduled. An absence will be considered unscheduled, even if you comply with the call-in procedure for your department or center, if you did not receive approval in advance from your supervisor.

It is a scheduled absence when you have requested time off at least 24 hours in advance and your supervisor has approved the absence.

Tardiness

Tardiness is reporting to work after your established or assigned starting time, or leaving prior to the end of your assigned shift, without receiving prior approval from your supervisor.

Absences of 5 or more consecutive days

If you are absent for five or more consecutive work days, you are expected to contact Human Resources to discuss your absence as you may be eligible for a leave of absence. You must complete a Leave of Absence (LOA) Application, in accordance with Gateway's Leave of Absence Policy.

If you have less than six months of service, please speak directly with the Employee Relations Officer regarding your absence.

Attendance Issues

Again, your presence at work is important, and we need to be able to count on you. If you have four separate tardies and/or unscheduled absences, you will be subject to corrective action.

No call, no show → job abandonment

'No call, no show' is the term we use when an employee fails to report to work and fails to notify his or her supervisor of an absence. Three consecutive days of 'no call, no show' is considered job abandonment and an official resignation.

CORRECTIVE ACTION GUIDELINES

At times, unfortunately, employee actions may be damaging, or potentially damaging to our mission, reputation or property, or the well-being of clients and co-workers. If you violate Gateway's Code of Conduct or any of our policies discussed in this Guide at any time during your employment, we will take corrective action.

Gateway does not follow a fixed set of progressive corrective action steps but considers the issue or misconduct in deciding the type and level of discipline. Corrective action typically takes the form of a verbal, written or final warning, or release from employment. The course of action is based on the circumstances, as well as the seriousness of the offense or violation and your overall work record.

Gateway management reserves the right to investigate and evaluate each incident as it occurs to determine the appropriate action. Documentation of any corrective action issued will be saved in your personnel file.



Gateway management reserves the right to investigate and evaluate each issue of misconduct as it occurs and to determine the appropriate corrective action.

Employee Appeal Procedure

If you have passed your Introductory Period and receive a corrective action, you may submit a written appeal to have the matter reconsidered. Performance reviews and matters of policy or procedure may not be appealed.

Appeals must be submitted in writing to your Director within ten calendar (10) days of receiving the corrective action. The Director will respond in writing to you within ten (10) calendar days of receiving your appeal. If you are not satisfied with that response, you have ten (10) days in which to send a written appeal to your Vice President, who will, in turn send a written response to you within ten calendar (10) days. If you believe the matter has still not been satisfactorily resolved, you may submit a final appeal to the Vice President of Human Resources within ten (10) calendar days; this appeal decision will be final.

Employee Complaint Procedure

Gateway is committed to treating you with dignity and respect – and to providing you and all employees with a way to discuss problems that affect your work. Whenever you have a problem that makes your time at work difficult, please discuss it with your supervisor, who will work with you to try to reasonably solve the problem. Gateway provides the following procedure that will give you an impartial review of any problem.

- Step One:* Discuss the issue with your immediate supervisor.
- Step Two:* If you feel you cannot discuss the problem with your supervisor, go directly to your Director or Vice President with your concern.
- Step Three:* If step two fails, you should discuss your problem with the Employee Relations Officer who may contact your supervisor or anyone else who is involved. We will promptly investigate the situation and advise you of a final decision within ten (10) calendar days of receiving your complaint.

EMPLOYMENT TERMINATION

If you decide to resign from Gateway, we will be sad to see you go. To ensure as smooth a transition as possible, we request that you give us a two-week notice.

If you are released from employment by Gateway, the terms and timing of your departure will be explained to you.

Exit Interview

If you resign, you are invited to participate in a confidential Exit Interview with a Human Resources representative. We are very interested in learning about your work experience with us, and how Gateway can improve as an employer. Please ask your supervisor for the names of the Human Resources staff you can call for this interview.

What to take, what to leave

Regardless of the reasons you're leaving our employ, all Gateway Foundation property, including your employee ID, Employee Guide, keys, documents and computer data/equipment, must be returned to your supervisor when you depart. We also expect you to take all of your personal property with you.

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BENEFITS

HEALTH & WELFARE

As part of our Total Rewards program, Gateway provides employees with an extensive benefit package. The health, dental and other welfare benefits we offer are designed to be comprehensive and offer choices to meet your needs and those of your co-workers.

It is your responsibility to ensure your dependents are added to a Plan, and to ensure your beneficiary designations are current.

Once you're eligible to participate, we'll provide you with information outlining the benefits available to you. Gateway requires verification of dependent status for any plan in which you enroll eligible family members. Verification of dependent status includes a birth certificate, marriage license, or other such documentation.

Additionally, Human Resources holds the official plan documents for our benefit plans. The nature and extent of these benefits are expressly dictated by these documents, which are available for you to read and review for all relevant terms, conditions, rights and benefits. The official plan documents are solely determinative of your rights and responsibilities, and nothing in this Guide should be construed to alter or amend those documents or the rights stated and defined therein.

Gateway reserves the right to amend or terminate any of the plans or to increase premium contributions, as allowed by law.

LEARNING AND DEVELOPMENT

At Gateway, we value and encourage the professional career development of our employees. We know that our success depends in part on your ability to learn, grow and progress in knowledge and responsibility.

Each year, senior management sets aside funds for continuing education and tuition reimbursement for full-time employees. If you're interested, be sure to talk with your supervisor. To receive funding, you need to submit your application for approval before beginning any continuing education courses or seminars.

Additionally, we provide access to a variety of web-based coursework at no cost to our employees. Several classes also offer continuing education credit upon successful completion.

EMPLOYEE ASSISTANCE PROGRAM

Personal problems can have an impact on your health and well-being, as well as your job performance. At Gateway, we offer an Employee Assistance Program (EAP) as a resource for help with family issues, financial or legal problems or addiction to alcohol or drugs. The EAP offers assessment services, referral to outside agencies, if necessary, and follow-up support. This service is free, confidential and open to all employees and their immediate family members.

We encourage you to use the EAP – to seek help before your job performance begins to suffer. Please be advised, however, that seeking assistance will not protect you from corrective action for policy violations or performance issues.

*The EAP is free, confidential and open to all employees.
Call 1-800-227-8620 to seek assistance.*

GATEWAY TO HEALTHY LIVING

At Gateway, we are proponents of good health and well-being. We have designed a program – *Gateway to Healthy Living* – to engage your interest, energy and dedication to healthy living. Periodically we offer different health incentives and promotions, and we provide a monthly newsletter to encourage employees and their families to focus on their good health and well being.

EMPLOYEE AWARDS

Milestone Award

Gateway recognizes the value of a stable and dedicated workforce. When you reach a milestone anniversary with Gateway – 1 year, 5 years, 10 years, 15 years, and so on – you are recognized for your service through our Milestone Awards program.

Service is calculated based on years of continuous employment. To receive the award, you must be an active employee at the time the Milestone Award is presented.

Perfect Attendance Award

It is an honor and privilege to work with individuals who come to work every day as scheduled. That's why we have the Perfect Attendance Award – to celebrate and recognize the commitment of those employees who are here day in and day out.

If you are an active, regular full-time employee in an eligible job category for an entire calendar year, have had no unscheduled absences or tardies, and were not on a Leave of Absence during that year, you're eligible for this cash award. Employees with five, ten, or fifteen consecutive years of Perfect Attendance receive additional awards and Paid Time Off. Employees absent for jury duty, bereavement, or Military Leave remain eligible for this award.

Your supervisor will notify Human Resources at the end of the year if you meet the criteria for the Perfect Attendance Award. Awards will be presented in the first quarter of the following year. You must be an active employee at the time of the presentation to receive the award.

*Gateway recognizes the value of a stable and dedicated workforce.
That's why we celebrate service anniversaries and perfect attendance.*

HOLIDAYS

If you're a regular full-time employee, you're eligible for 7.5 or 8.0 hours of Holiday Pay, based on the regularly scheduled hours of your program or department, for the following holidays:

<i>New Years Day</i>	<i>Independence Day</i>
<i>Martin Luther King, Jr. Day</i>	<i>Labor Day</i>
<i>Presidents' Day</i>	<i>Thanksgiving Day (and day after)</i>
<i>Memorial Day</i>	<i>Christmas Day</i>

We want you to enjoy your holiday and take this time away from work. If you end up working on a holiday, you'll be eligible for premium pay and allowed an alternate day off on a date approved by your supervisor.

Holiday hours paid but not worked are used in computing overtime hours.

Some Gateway programs may observe different paid holidays than those listed above, based on contractual or legal obligations. Please consult with your supervisor regarding holidays at your program.

PAID TIME OFF (PTO)

Gateway's Paid Time Off, or PTO plan, is designed to give you flexibility and choice in managing your time away from work. PTO may be used for vacations, personal days, scheduled appointments or short-term illnesses.

PTO accruals begin at hire. If you are a regular full-time employee, you are eligible to earn PTO hours for each full pay period worked as follows:

5 Years or Less Service

*Up to 18 days per year
Accruals begin from most recent date of hire, until you complete 5 years of continuous service.*

5 - 10 Years Service

*Up to 23 days per year
Accruals begin from the 1st day of the pay period following the completion of 5 years of continuous service.*

10+ Years Service

*Up to 28 days per year
Accruals begin from the 1st day of the pay period following the completion of 10 years of continuous service.*

If your program/department observes a different paid holiday schedule, your accrued PTO may differ from this schedule.

A few other facts will help you understand PTO and how it works:

- *Your PTO balance may not exceed 28 days at any time.*
- *You may not donate your PTO to another employee.*
- *PTO does not accrue when you are on a leave of absence, including workers' compensation leave.*
- *PTO taken is not counted as hours "worked" for purposes of calculating overtime.*
- *Payments will not be made for unused PTO, except when you have accrued unused PTO at the time of transfer to part-time status, or upon release from employment.*
- *You may only use earned PTO hours.*
- *You must exhaust all PTO hours prior to taking unpaid time off.*

PTO may be used for vacations, personal days, scheduled appointments or short-term illnesses.

CATASTROPHIC ABSENCE TIME (CAT)

Gateway's Catastrophic Absence Time, or CAT plan, works in conjunction with our PTO plan (see section above). CAT may provide you with pay for time off if you should have an extended personal illness, injury or disability and be absent for five or more consecutive work days.

How CAT works

In the case of your own personal illness, you may use your CAT beginning with the fifth consecutive working day of absence. If your absence will more than likely extend five or more days, you (or a designated representative) will need to request a Leave of Absence (LOA) Application from Human Resources, complete the application and return it within 15 calendar days of your request for leave.

For CAT to be authorized on your behalf, we require a completed, approved LOA application to be on file with Human Resources. Failure to submit an LOA application may result in the denial of your request for leave and use of CAT.

If you are on an approved intermittent leave, you may be permitted to use your CAT for related absences once you have satisfied the four-day waiting period.

Earning CAT

CAT accruals begin at hire. If you are a regular full-time employee, you're eligible to accrue seven CAT days per year.

CAT does not accrue when on a leave of absence, including workers' compensation. Any CAT you take is not counted as hours worked for purposes of calculating overtime. You will not be paid for unused CAT.

A few other facts will help you understand CAT and how it works:

- *Your CAT balance may not exceed 60 days at any time.*
- *You may not donate your CAT to another employee.*
- *You may only use earned CAT hours.*
- *You must exhaust all CAT hours prior to taking unpaid time off.*

OTHER TIME OFF PROVISIONS

School visitation

If you are a parent or guardian of school-age children, we understand that sometimes your involvement in their schooling and education requires your presence when you are scheduled to work.

Generally, you'll use PTO to attend school conferences or your child's classroom activities. You may also take up to eight hours of unpaid time each school year, with no more than four hours on any given day, for those school activities that cannot be scheduled during non-working hours – as long as arrangements have been made in advance with your supervisor.

It is our expectation that you will exhaust all PTO accruals prior to taking unpaid time for school visitation.

Bereavement

When there is a death in the family, Gateway understands that you need time to be with other family members as part of the grieving process. If you are a regular full-time employee, you're eligible to take time off from work for bereavement.

If the person who has died is a member of your immediate family, Gateway will pay your wages for a period of up to three regularly scheduled work days. If attending the funeral or memorial service requires you to travel 500 miles or more each way, a fourth day with pay may be made available to you.

Immediate family includes your parent, step-parent, spouse, child, step-child, brother, sister, father-in-law, mother-in-law, grandmother, grandfather or grandchild. For other family members or friends, you will need to request PTO for the period of bereavement.

Please be advised that time off for bereavement leave must be approved by your supervisor, and, depending on the circumstances, you may be required to submit appropriate documentation of the death in your family to your supervisor.

Gateway will pay your wages for up to three regularly scheduled work days in the event of a death in your immediate family.

Voting

We encourage our employees to exercise their right to vote. We want you to have reasonable and necessary time off to vote in state, municipal and national elections.

Because voting stations generally open early and close late, we believe you should have sufficient personal time outside of scheduled working hours to vote. However, if special arrangements are necessary, you should talk with your supervisor. The amount of time off and whether it is paid or unpaid depend on the laws of the state where you live.

If you intend to serve as a judge, clerk or official watcher at an election poll, you may use PTO, or take time off without pay if you have no PTO available. You will need to get your supervisor's approval at least two weeks in advance.

Jury duty

If you are called to jury duty, you will be granted the time off necessary to fulfill this civic responsibility. We ask that you notify your supervisor as soon as you receive the jury summons.

Gateway will generally continue your pay for up to five working days per calendar year. You may also keep any payment you receive for jury service; jury service payments may be considered taxable income.

If you're normally scheduled to work on days when you do not have to appear in court, or if you're excused at least four hours before the end of your scheduled shift, we expect you to report to work and resume your regular job responsibilities.

LEAVES OF ABSENCE

Sometimes it is necessary to be absent from work for an extended period of time. The reasons vary – a family member needs care, you've been called for military duty or you have a serious health condition that requires your full attention. It is our intent to comply with all federal leave provisions, as well as those provided by the states in which Gateway operates, in granting leaves of absence.

Procedure for requesting a leave

Gateway requires that a Leave of Absence (LOA) Application be completed for any personal, military, family or medical absence of five or more consecutive work days.

Any absence of five or more consecutive work days requires an approved leave of absence regardless of the reason for the absence and whether the employee has accrued PTO or CAT or is entitled to any other form of time off benefit.

The process begins with you obtaining an LOA application from Human Resources as soon as you are aware of the need to take a leave. You are required to provide 30-day advance notice when you know ahead of time and such notice is practicable. Human Resources will forward an LOA application to you, generally at your home, once your request for a leave has been made.

We require an LOA application to be completed and on file with Human Resources for any personal, military, family or medical absence of five+ consecutive work days.

The application should be completed by you or your designated representative if you are medically unable to complete the form.

Your completed LOA application must be received by Human Resources within 15 calendar days of your request for leave. If you do not submit the application, your leave may be denied, and you may not be able to use your accrued CAT.

Medical certification

If the reason for a leave is your own serious health condition or that of an immediate family member, as defined by the Family Medical Leave Act (FMLA), your Leave of Absence application will need to include medical certification from your health care provider, or the health care provider of your immediate family member, as the case may be.

The completed medical certification must support the need for leave due to a serious health condition, and be returned within 15 days after it is requested, or as soon as reasonably possible under the circumstances. If the requested medical certification is not provided in a timely manner, your request for leave may be denied or delayed. Under some circumstances, we may require a second or third medical opinion, along with periodic reports during your leave regarding your status and ability/intent to return to work.

If you have been granted a leave for your own health condition, you will be required to provide a Return to Work Certification form from your health care provider prior to your return to work.

Benefits while on leave

If your leave of absence is approved, you may elect to continue your existing benefits coverage at the active employee rate. Your payments to continue this coverage must be submitted to Human Resources by the first of each month to avoid cancellation.

If you're on a leave of absence for a full pay period, you will not accrue PTO or CAT hours.

If you do not return to work at the end of the leave period, you will be required to reimburse Gateway for the cost of the premiums paid by Gateway for maintaining coverage during your unpaid leave.

FAMILY MEDICAL LEAVE OF ABSENCE (FMLA)

The Leave Policy

Eligible employees may take up to 12 weeks of unpaid family/medical leave within any rolling 12-month period and be restored to the same or an equivalent position upon return from leave. To be eligible, you must have worked for Gateway for at least 12 months, and have worked at least 1250 hours in the last 12 months. The "rolling 12-month period" is measured backwards from the date a leave is to begin.

Reasons for Leave

If you are eligible, you may take Family Medical Leave for any of the following reasons:

1. *the birth of a son or daughter and in order to care for such son or daughter*
2. *the placement of a son or daughter with you for adoption or foster care*
3. *to care for a spouse, son, daughter, or parent (“covered family member”) with a serious health condition*
4. *because of your own serious health condition which renders you unable to perform the functions of your job.*



Leave because of reasons “1” or “2” must be completed within the 12-month period, beginning on the date of birth or placement. In addition, spouses employed by Gateway who request leave because of reasons “1” or “2” or to care for an ill parent, may only take a combined total of 12 weeks leave for such purposes during any 12-month period.

You may not be granted an FMLA leave to gain employment or work elsewhere, including self-employment. If you misrepresent facts so you will be granted an FMLA leave, you will be subject to immediate release from employment.

Notice of Leave

If your need for Family Medical Leave is foreseeable, you must give Gateway at least 30 days prior written notice. Failure to provide such notice may be grounds to delay your leave. Where the need for leave is not foreseeable, you are expected to notify Gateway as soon as practicable, generally within one to two business days of learning of your need for leave. An application for Family Medical Leave may be requested from Human Resources.

It is your responsibility, not the health care provider’s, to ensure Gateway receives the fully completed medical certification by the deadline. If Gateway does not receive a fully completed certification by the deadline, unless there is a legitimate reason for the delay, or if the certification does not confirm an FMLA-qualifying condition, your absence(s) will be applied to Gateway’s attendance policy.

At our own expense, we may require an examination by a second health care provider designated by Gateway. If the second health care provider's opinion conflicts with the original medical certification, we may at our own expense require a third, mutually agreed upon, health care provider to conduct an examination and provide a final and binding opinion.

Gateway may also require medical recertification periodically during your leave. In addition, following a leave for your own illness you are required to present a Return to Work Certification form upon your return to work.

Reporting while on Leave

If you take a Family Medical Leave because of your own serious health condition or to care for a covered family member, you may be required to contact your supervisor or Human Resources on a regular basis regarding the status of the condition and your intent to return to work. For all other types of leaves, you may be periodically required to report on your status and intent to return to work.

Leave is unpaid

Family Medical Leave is unpaid leave. If your absence is less than five consecutive days, you must use available PTO hours to receive pay for your time off. If PTO hours are not available, the absence will be unpaid.

CAT must be used beginning with the fifth consecutive day of absence for your own personal health condition. The use of CAT requires that a completed and approved LOA application be on file with Human Resources within 15 calendar days of your request for leave. Otherwise, both your leave and use of CAT may be denied.

If you take a leave of absence for reasons other than your own serious health condition, you must use accrued PTO. Once exhausted, the remainder of the leave will be unpaid.

Exemption for Key employees

Certain “key” employees may not be returned to their former or equivalent position following a leave if restoration of employment will cause substantial economic injury to Gateway. A key employee is defined as a salaried employee who is in the highest paid 10% of employees at a worksite or within a 75-mile radius of that worksite. Gateway will notify you if you qualify as a “key” employee and if we intend to deny reinstatement. You will also be informed of your rights in such instances.

Intermittent and reduced schedule Leave

Leave because of a serious health condition may be taken intermittently, that is, in separate blocks of time due to a single qualified health condition. Leave may also be taken as a reduced schedule, that is, by reducing the usual number of hours you work per workweek or workday, if medically necessary.

If leave is unpaid, Gateway will reduce your pay based on the amount of time actually not worked. In addition, while you are on an intermittent or reduced schedule leave for foreseeable, planned medical treatment, Gateway may temporarily transfer you to an available alternative position which better accommodates your recurring leave and which has equivalent pay and benefits.

Leave as a disability accommodation

Notwithstanding other leave of absence and attendance policies and limits administered by Gateway, employees who request or need leave because of a disability as defined by the Americans with Disabilities Act, as amended, will be considered for reasonable accommodation.

Other applicable leaves

Family Medical Leave runs concurrently with any other applicable leave. For instance, workers’ compensation leave or Victims’ Economic Security and Safety Act (VESSA) will be simultaneously designated as Family Medical Leave when appropriate.

Returning from FMLA

If you wish to return to work at the end of your leave, you are entitled to return to your same or an equivalent job, with equal pay and benefits, along with other terms and conditions of employment, subject to any applicable exceptions. However, you have no greater right to reinstatement or other benefits and conditions of employment than if you had not taken leave.

You must return to work immediately after the expiration of your approved Family Medical Leave in order to be reinstated to your same or an equivalent job.

If you take leave because of your own serious health condition, you are required to provide a Return to Work Certification form from your health care provider that states that you are fit to resume work. Employees will not be permitted to resume work until the Return to Work Certification form is provided.

If you are unable to return to work at the end of the 12 weeks of leave, you may apply for a personal leave and/or you may be eligible to apply for Long Term Disability benefits.

If you work in a state that provides greater benefits under a state family and medical leave law, you will be provided the benefits under whichever law provides the most favorable benefits to you.

MILITARY LEAVE

If you are a military reservist, you may be called for training or active service. If so, you are eligible for military leave in compliance with relevant state and federal laws. You should notify your supervisor immediately after military orders have been issued.

You may use available PTO during military leave. Once PTO is exhausted, the remainder of the leave will be unpaid. You do not earn PTO or CAT hours while on military leave for a full pay period.

When returning to work from military service, you are entitled to re-employment and benefits in compliance with applicable state and federal laws.

Activation of military reservists

In the event of an activation of military reservists by Presidential Order, Gateway will abide by all provisions of the Uniformed Services Employment and Reemployment Rights Act (USERRA). Once activated for full-time duty, an employee will be provided the rights of someone on military leave.

MILITARY FAMILY LEAVE

If you are the spouse, son, daughter or parent of an employee on active duty, you are eligible for up to 12 weeks of leave due to any “qualifying exigency” that is the result of your family member being on active duty, or having been notified of an impending call to active duty status, in support of a contingency operation.

Additionally, if you are the spouse, son, daughter, parent, or next of kin of a covered service member who is recovering from a serious illness or injury sustained in the line of duty on active duty, you are entitled to up to 26 weeks of leave in a single 12-month period to care for the service member.

PERSONAL LEAVE

A leave of up to six weeks during a rolling 12-month period may be granted to a regular full-time employee for personal reasons, other than those that might be covered by Family Medical Leave. However, the approval of a personal leave is at the sole discretion of Gateway.

To qualify, you must have been employed by Gateway for at least six months, and you must provide 30 days notice, where possible, of your desire to take a personal leave. An LOA application must be completed and on file with Human Resources if the personal leave is to exceed five or more consecutive work days.

The six-week period of personal leave begins with your first day of absence. You must use PTO for personal leaves not related to your own serious health condition. Once your accrued PTO hours are exhausted, the remainder of your leave will be unpaid.

A leave of up to six weeks may be granted for personal reasons, other than those that might be covered by Family Medical Leave.

If you are not eligible for Family Medical Leave but meet the criteria for a personal leave, and if you are absent for five or more consecutive days due to your own serious health condition, available CAT may be used. For Human Resources to authorize the use of your available CAT, a completed, approved LOA application must be on file with Human Resources within 15 calendar days of your request for leave. Failure to submit your LOA application may result in the denial of your request for leave and the use of your CAT.

As you return from a personal leave, Gateway cannot guarantee that you will return to your former position. You may reapply for your position if it is vacant. If you do not return to work at the end of the approved leave period, your employment may be terminated.

DOMESTIC VIOLENCE LEAVE – ILLINOIS EMPLOYEES ONLY

The Leave Policy

If you are an Illinois employee, you may take unpaid leave under the Victims' Economic Security and Safety Act (VESSA) to seek assistance in response to an act or threat of domestic violence, sexual assault or stalking. You may take this leave to seek services for a victim of domestic or sexual violence if the victim is 1) you, 2) a covered family member (i.e., spouse, child, parent) or 3) a household member who is currently residing with you. VESSA leave is not allowed, however, if your interests regarding the violent act are adverse to the victim's interests.

You may take leave for a child who is a victim if that child is under age 18 or, if 18 years or older, the child is mentally or physically disabled and incapable of self-care. You are eligible to take up to 12 weeks of unpaid VESSA leave within any 12-month period and be restored to the same or an equivalent job upon your return from leave.

Reasons for Leave

You may take VESSA leave to obtain assistance or services for a victim for the following purposes:

- *to seek medical attention for, or recover from, physical or psychological injuries caused by the domestic or sexual violence*
- *to obtain services from a victim services organization*
- *to obtain psychological or other counseling*
- *to participate in safety planning, seek temporary or permanent relocation or take other actions to increase the safety of the victim from future domestic or sexual violence or ensure economic security*
- *to seek legal assistance or remedies to ensure the health and safety of the victim, including preparing for or participating in any legal proceeding related to or resulting from domestic or sexual violence.*

If you misrepresent facts in order to be granted a VESSA leave, you will be subject to immediate release from.

Notice of Leave

You must give Gateway at least 48 hours prior notice to receive a VESSA leave, unless providing advance notice is not practicable under the particular circumstances. If you are unable to provide advance notice, you must provide notice when you are able to do so, within a reasonable period of time after the absence. Failure to provide the required notice may result in treatment of the absence(s) as unexcused under Gateway's attendance policy.

Certification

Employees requesting VESSA leave must provide proper certification for all absences. The certification must show that:

- *the victim for whom the leave is requested is the employee, a covered family member or a covered household member*
- *the victim was subjected to an act or threat of domestic or sexual violence*
- *the leave is to seek assistance for a purpose covered by the Act.*

You must provide two types of written documentation as certification:

1. *a sworn statement from you showing that the leave qualifies for a purpose covered by VESSA,*

AND

2. *written documentation from the source from whom assistance was sought or who could otherwise verify the nature of the leave. Such documentation might come from a representative of a victim services organization, an attorney, member of the clergy or a medical or other professional – someone from whom you have sought services on behalf of a covered victim to address domestic or sexual violence or the effects of the violence. The documentation could come from a police or court record, or other corroborating evidence can be used as well.*

It is your responsibility to ensure that Gateway receives the proper certification. If Gateway does not receive adequate certification within a reasonable time period after certification has been requested, or if the certification does not confirm a VESSA-qualifying purpose, your absence(s) may be treated as unexcused.

Reporting while on Leave

You may be required to contact your supervisor on a regular basis regarding the status of your leave and your intention to return to work.

Leave is unpaid

VESSA leave is unpaid leave. You may choose, however, to use any accrued PTO which would otherwise apply to the circumstances of the leave. For instance, if the leave was for you, because you are temporarily disabled due to domestic or sexual violence, you may use accrued time in accordance with the FMLA policy for that portion of the leave. The substitution of paid leave time for unpaid leave time does not extend the 12-week leave period.



Medical and other benefits

During an approved VESSA leave, Gateway will maintain your existing benefits coverage, as if you continued to be actively employed. If your leave is paid, Gateway will deduct your portion of any plan premium(s) as a regular payroll deduction. If your leave is unpaid, you must pay your portion of the premium(s) during the leave. Your payments to continue coverage must be submitted to Human Resources by the first of each month to avoid cancellation. Your plan coverage(s) may cease if you fail to make timely payments of your share of the premiums.



If you do not return to work at the end of the leave period, you may be required to reimburse Gateway for the cost of the premiums paid by Gateway for maintaining coverage during your unpaid leave. The exception is if you cannot return to work because of the continuance, onset or recurrence of domestic or sexual violence or other circumstances beyond your control. If that is the case, you will be required to produce written certification to confirm the circumstances beyond your control.

PTO and CAT and other benefits do not accrue while you are on VESSA leave. You remain entitled to all of your benefits which accrued prior to your leave, however.

Intermittent and reduced schedule Leave

VESSA leave may be taken intermittently, that is, in separate blocks of time. Or it may be taken on a reduced leave schedule by reducing the usual number of hours you work per workweek or workday. If leave is unpaid, Gateway will reduce your pay based on the amount of time not worked.

Other applicable Leaves

VESSA leave will run concurrently with any other applicable leave. For instance, leave taken under VESSA which also qualifies under the Family and Medical Leave Act will be simultaneously designated as both VESSA and Family Medical Leave.

Returning from Leave

If you wish to return to work at the expiration of your leave, you are entitled to return to your same position or to an equivalent position with equal pay, benefits and other terms and conditions of employment, subject to any applicable exceptions. However, you have no greater right to reinstatement or other benefits and conditions of employment than if you had not taken leave.

You must return to work immediately after the expiration of your approved VESSA leave in order to be reinstated to your position or an equivalent position. If you take leave because of your own medical or psychological condition, you are required to provide a release to return to work that clearly states that you are fit to resume work, according to Gateway's usual policies.

Reasonable accommodation in the workplace

Gateway will consider making reasonable accommodations to you, another employee or job applicant for a known limitation resulting from domestic or sexual violence, unless the accommodation would cause Gateway an undue hardship. If you are an otherwise qualified individual who can perform the essential functions of your job, but need such an accommodation, Gateway may provide an adjustment to the job structure, workplace facility, work requirements or your telephone number, seating assignment or physical security of your work area in response to a need covered by VESSA.

Gateway will also consider a request for transfer, reassignment or modified schedule, if needed, due to a known limitation caused by an act or threat of domestic or sexual violence. Other safety measures may also be appropriate. Any employee covered by VESSA may make a request for leave or for a reasonable accommodation to the Employee Relations Officer.

Confidentiality

Gateway will maintain your written certifications and other documentation regarding any requests for VESSA leave in a confidential file. Gateway will not disclose the nature of your leave other than to those specific persons who need to know in order to ensure you receive your VESSA rights.

No retaliation

Gateway strictly forbids any of its employees, managers or other representatives from discriminating, retaliating or otherwise treating you or another employee unfavorably for requesting or taking VESSA leave or exercising any other rights under VESSA.

If you feel you have been denied your VESSA rights or if you feel you have been treated unfavorably for having exercised any VESSA rights, you should immediately report such action to the Employee Relations Officer. Gateway will investigate your concerns and take corrective action if it is determined that someone has violated Gateway's VESSA policy.



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CODE OF CONDUCT

Honesty. Integrity. Character. Values. Ethics. Good moral judgment. These are the concepts and practices on which all great organizations have been built.

*We must all be dedicated to
“doing the right thing” every single day.*

Gateway is dedicated to these principles, as reflected in our Code of Conduct. The pages that follow outline the professional standards by which Gateway’s employees and volunteers are to conduct themselves. To ensure our ongoing commitment to integrity and the highest standards of service to our clients, fellow employees, suppliers and the public at large, it is our expectation that you will conduct yourself in a professional manner and comply with this Code – along with Gateway’s other policies and procedures described in this Guide. We must all be dedicated to “doing the right thing” every single day.

STANDARD OF CONDUCT

Because of the nature of our work at Gateway, we must hold ourselves to the highest professional standards at all times. The following list, while not meant to be all inclusive or exhaustive, provides examples of activities or behavior that we consider serious breaches of our ethics, policies and Code of Conduct. In other words, you should NOT...

1. *Violate any Gateway rule, policy or procedure.*
2. *Engage in any activity that is contrary to the best interests of Gateway.*
3. *Be insubordinate to your supervisor or refuse to follow orders or instructions issued.*
4. *Threaten, intimidate or coerce fellow employees on or off Gateway’s premises at any time or for any purpose.*
5. *Impair or threaten the reputation of Gateway Foundation.*
6. *Engage in an act of sabotage. Neither should you willfully or with gross negligence cause the destruction or damage of Gateway’s property, or the property of fellow employees, clients, vendors or visitors.*
7. *Improperly remove from the premises or possess any Gateway property, or the property of fellow employees or clients, including documents, without prior permission from management. Neither should you use Gateway equipment or property for personal reasons without management’s prior consent or use Gateway equipment or property for personal profit.*

8. *Engage in malicious gossip and/or spread rumors; engage in disruptive behavior; interfere with another employee on the job; hamper work or encourage others to do the same.*
9. *Engage in any unlawful, immoral or indecent activity on Gateway's premises.*
10. *Falsify or tamper with any documents, records, applications and the like.*
11. *Use obscene or abusive language toward any Gateway officer, director, supervisor, employee, client or any member of a client's family; be rude toward a client or fellow employee; engage in any disorderly or antagonistic conduct on Gateway's premises.*
12. *Accept or solicit tips, gifts or services of any kind from clients, their families, and visitors; nor accept gifts outside of Gateway policy.*
13. *Request property or money from clients, their families or vendors for any cause unless authorized to do so by Gateway management.*
14. *Handle or manage money for clients unless specific approval is given in writing by the director of your location or senior management.*
15. *Waive fees for clients, unless specific approval is given in writing by the director of your location or senior management.*
16. *Lend or give money or gifts to clients or their families.*
17. *Fail to report to the director of your location or senior management any activity that appears to violate the law, or this Code of Conduct.*

LEGAL COMPLIANCE AREAS

Gateway strives to ensure all our activities are in strict compliance with applicable laws. As such, you are required to comply with all applicable laws, whether or not they are specifically addressed in this Code of Conduct.

If you have questions about the existence, interpretation or application of any of these laws, please direct your concerns or inquiries to your supervisor. If this is uncomfortable or inappropriate, you can contact the next higher level of supervision or the Corporate Compliance Hotline at 800-457-2598.

Records documentation and retention

We consider it your responsibility to maintain the integrity and accuracy of Gateway's documents and records to comply with applicable laws and regulations. It is also up to you to ensure that these records are available at any time to defend Gateway's business practices. You are not to alter or falsify information on any record or document.

Just as important, no client record may be removed from Gateway premises or any of its program sites, except for approved storage or as authorized under Gateway policies and procedures. Our client and business records are to be retained in accordance with applicable laws and record retention policies. We expect that you will never tamper with, remove or destroy records contrary to Gateway policy.

You are never to alter or falsify information on any record or document.

Fraud and abuse

We expect your dealings with Gateway, our clients, payers, vendors and your co-workers to be honest and above board. That is, we expect you to refrain from conduct which may violate fraud and abuse laws. You may NOT...

1. *accept payments in exchange for the referral of clients.*
2. *submit false, fraudulent or misleading claims to any government entity or third party payer, including claims for services not rendered, claims which characterize the service differently than the service actually rendered, or claims which otherwise do not comply with applicable program or contractual requirements.*
3. *make false representations to any person or entity in order to gain or retain participation in a program or to obtain payment for any service.*

License and certification

Gateway operates its business and programs within the constraints of all applicable licensure and certification requirements. This also means we require employees to obtain and maintain all appropriate professional licenses and certifications.

Funding contract requirements/certifications

Gateway has a legal and ethical obligation to act in compliance with funding contract requirements and certifications. We expect you and all our employees to act in a manner consistent with these obligations.

Tax exemption

As a not-for-profit organization, Gateway has a legal and ethical obligation to engage in activities that advance our charitable purposes. We are also obligated to ensure our resources are used in a manner that furthers the public good, rather than the private or personal interests of any individual.

To this end, we avoid compensation arrangements and transactions in excess of fair market value. We accurately report payments to appropriate taxing authorities and file all tax information returns in a manner consistent with applicable laws.



Antitrust

Antitrust laws are designed to regulate competition. As a Gateway employee, you are expected to comply with applicable antitrust and similar laws which prohibit, among other things:

1. *agreements to fix prices, bid rigging, collusion (including price sharing) with competitors*
2. *boycotts, certain exclusive dealing and price discrimination agreements*
3. *unfair trade practices including bribery, misappropriation of trade secrets, deception, intimidation and similar unfair practices.*

If you are confronted with business decisions which may put you and Gateway at risk of violating antitrust laws, we expect you to seek advice from Gateway's Corporate Compliance Officer at 312-663-1130, ext 2235.

Detection of false claims

As described in our compliance program, Gateway is dedicated to reasonably committing our resources to ensure the accuracy of filed claims. We designate individuals with appropriate knowledge and training who are either employed or contracted by Gateway to perform regular audits to detect and prevent false claims.

Duty to report

All Gateway employees have a responsibility to comply with the law and report any known violation of it. If you have a good faith belief, based on objective information, that a false claim has been or will be made, you must report this information to your supervisor, the Corporate Compliance Officer at 312-663-1130, ext 2235, the Corporate Compliance Hotline at 800-457-2598, the Social Security Administration or the Office of the Inspector General. Failure to report such a violation will result in corrective action.

If you are uncertain whether a practice or procedure violates the law, please speak with our Corporate Compliance Officer at 312-663-1130 regarding the practice in question.

*Gateway's Corporate Compliance Hotline
can be reached toll free at 800-457-2598.*

Investigations of reports

Upon receiving a report that a false claim has been or will be made, Gateway will promptly investigate the complaint and work with all parties involved to correct any non-compliance.

Penalties

State and federal law provide civil and criminal penalties for making false claims against the government. Under both Illinois and federal law, the penalty for filing false claims against the government ranges from \$5,000 to \$10,000, plus three times the amount of damages which the government sustains because of the false claim.

In addition, the agency against which a false claim is filed may impose a penalty of up to \$5,000 for each claim, plus an assessment of up to twice the amount of the false claim.

Protection from retaliation

Employees who lawfully report false claims are protected from retaliation by Gateway policy and federal and state law.

REPORTING ILLEGAL ACTIVITIES

We do not expect it to happen. But... if you are arrested for any illegal activity or driving infractions, or if you are notified of an investigation indicating credible evidence against you of alleged child abuse or neglect, you must notify your immediate supervisor within five days of your arrest or notification – unless another policy, regulation or statute requires reporting within a more immediate timeframe.

If you are convicted of any violation of any criminal statute, including any moving violations, you must notify the Employee Relations Officer within five days of the date of conviction. A conviction means a guilty finding, including one agreed to by you, or a plea of “no contest” and/or any imposition of a fine, probation, jail sentence or other penalty.

We reserve the right to terminate your employment based on the nature and circumstances of your conviction. Failure to comply with the notification requirement will result in corrective action.

MANDATED REPORTER

As a Gateway employee, you must comply with any and all state laws for reporting child abuse and/or neglect. You are expected to report any suspected incidents of abuse and/or neglect to your director/department head immediately and then to the appropriate state agency, as outlined by Gateway policy and state law.

PROFESSIONAL BEHAVIOR AND BOUNDARIES

To ensure Gateway clients receive optimum care and treatment, you are expected to maintain a professional, helping relationship with your clients and their families. That is, they are to be treated in a manner that preserves their dignity, autonomy, self-esteem, civil rights and involvement in their own care. Never at any time are you to engage in any activity which may give the appearance or impression of impropriety.

To protect our clients during the recovery process, you are prohibited from engaging in any social, romantic or sexual relationships with them or their family members for two years.

To protect our clients during the recovery process, you are also prohibited from engaging in any social, romantic or sexual relationships with them or their families. This prohibition continues for a period of two years after the client is discharged from all treatment, or in the case of an adolescent, until his or her 22nd birthday, whichever is longer. If you violate this prohibition in any way, you will be subject to corrective action. Please be further advised that you risk the revocation of your license or certification.

We also consider it important for you to conduct yourself in a professional manner when interacting with co-workers. Appropriate internal channels should be used to express differences of opinion. Public statements or actions reflecting your personal opinions are to be clearly distinguished from those expressed as an employee or representative of Gateway.

If at any point you are unclear as to the type of activities that are prohibited under this policy, you should discuss the matter with your supervisor right away.

Conduct within correctional/institutional facilities

Many of our treatment programs are located in correctional or other institutional facilities. If you work at or visit these facilities you are subject to their rules, regulations and policies. Additionally, if you will be working at one of these facilities, you will be required to attend an orientation session outlining the correctional facility's procedures and policies related to professional behavior and other conduct.

Your employment with Gateway may be terminated if, for any reason – including but not limited to misconduct and/or violations of established institutional rules of conduct – you are denied access to the correctional facility or institution to which you have been assigned.

We expect you to provide prompt and full disclosure of possible conflicts of interest to your supervisor.

CONFLICT OF INTEREST

Conflicts of interest are to be avoided. By this, we mean that you are expected to refrain from any activities which are detrimental to, or in any way conflict with, Gateway's purpose, goals and/or programs. In addition, we expect you to provide prompt and full disclosure of possible conflicts of interest to your supervisor.

More specifically, a conflict of interest may exist if your outside activities or interests influence, or appear to influence, your ability to make objective decisions in the course of your job. A conflict may also exist if the demands of any outside activities hinder or distract you from the performance of your job, or if they result in the use of Gateway resources for any purpose other than Gateway business, goals and programs.



Holding a second job is an example. If you wish to have outside employment, you must request approval in writing from your director or department head. Approval must be received prior to beginning the non-Gateway job. If the activity or job is determined to be in conflict or competition with our purpose, goals or programs, we reserve the right to review your continued employment with Gateway.

If there is any question in your mind as to whether an outside activity might constitute a conflict of interest, you should notify your supervisor right away for an open, forthcoming discussion of your concerns.

CONFIDENTIAL INFORMATION

In the course of your work at Gateway, you may have access to confidential information, including clients' or employees' medical or treatment records, financial information or personal affairs. You are expected to maintain the confidentiality of this information in accordance with Gateway policy and all applicable legal and ethical standards, including federally mandated confidentiality of drug and alcohol treatment information and confidentiality of HIV/AIDS information.

Any unauthorized or inappropriate disclosure of information about a client or co-worker is not only a breach of professional ethics, it is cause for possible legal action against you and/or Gateway. As such, it may result in corrective action.

You may also have access to trade secrets and proprietary information about Gateway. Again, you are expected to maintain strict confidentiality and not reveal any trade secret or proprietary or confidential information about Gateway, either during or after employment.

Trade secrets, proprietary information or confidential information includes, but is not limited to...

- *all business and financial documents, including client information*
- *information relating to proposed and existing relationships with other organizations*
- *information relating to organizational structures, company policies, procedures and protocols*
- *business methods*
- *business plans*
- *pricing and rate structures*
- *corporate systems*
- *employee information*
- *training materials*
- *any other Gateway information of a business nature.*

Such information need not be marked as confidential to be considered trade secret, confidential or proprietary.

You may disclose a trade secret, proprietary or confidential information if such disclosure is necessary for you to perform your job duties – but only if you receive written approval from a member of Gateway senior management prior to the disclosure.

We expect you to maintain the confidentiality of clients' or employees' medical or treatment records, financial information or personal affairs.

Some employees will have access to client or employee information on various computerized Gateway information systems. If you are assigned an access code that grants you computer access to this information, you will be required to sign a confidentiality agreement. None of the information contained in the computer files is to be disclosed or used for any purpose other than those included in your assigned duties.

When in doubt about what to say or do about a particular situation, please discuss it with your supervisor.

Requests for information

If you receive either an internal or external inquiry about a client or employee, it must be directed to appropriate Gateway personnel. You are not permitted to provide any information.

Requests for information from the media about Gateway's mission, business, news or clients should be referred immediately to your director or department head. Do not provide any information.

Any agent of the court seeking information or serving a subpoena should be referred to your director or department head or authorized representative.

INFORMATION SYSTEMS

Gateway provides computers to employees for business purposes, plus a variety of software, also for employees' business use. In establishing our operating system, we have considered the needs of our business, as well as the necessity of maintaining a manageable computer network.

Understandably, no software is to be installed or used on any of our computers unless Gateway has a valid license for that software.

Security measures

We have configured our computer equipment to be efficient and secure. System users are not authorized to alter the configuration of any computer or network element without the advance written approval of Gateway's Vice President of Information Services.

In establishing a network and equipping Gateway with computers and software, it is our sole intent that our computers and email are to be used for Gateway business. Use of your computer for other purposes without the advance permission of your supervisor is prohibited.

Internet use

If you are an employee who has been granted access to the Internet by Gateway, you are expected to conduct yourself in an ethical, legal and professional manner, and limit internet use to business purposes:

- *refrain from unauthorized transmittal or advertising of Gateway's products and services*
- *do not access non-work related social media on Gateway owned or supplied equipment*
- *refrain from unauthorized use of passwords and encryption keys to gain access to other employees' email messages*
- *do not send or publicly post confidential materials outside of Gateway Foundation*
- *do not make, use, distribute or sell copies of copyrighted software.*

Company records

All email messages are considered company records. Backup copies of email messages may be maintained and referenced for business and legal purposes.

Emails or documents sent or received over the internet are not inherently secure. You should not send or receive confidential information via email unless it is encrypted. In no case should highly sensitive information, including any information which names or identifies a client, be sent in unencrypted form.



We reserve the right to monitor the system and review the content of computer files and email messages at any time.

Personal use prohibited

Under no circumstances should you or other employees use email, voicemail or computer network systems in any way that may be seen as insulting, defamatory, obscene, harassing, disruptive, offensive or harmful to morale by other persons. Examples of forbidden transmissions include sexually explicit messages, unwelcome propositions, ethnic or racial slurs or any other message that can be construed to be harassment or disparagement of others based on their sex, sexual orientation, race, color, national origin, citizenship status, ancestry, age, marital status, medical condition, mental or physical disability (actual or perceived), veteran status, religious or political beliefs or any other characteristic protected by federal or state law or local ordinance.

All email messages and PC content are considered company records.

You are also prohibited from participating in 'mailing lists,' notice boards, forums, news groups, blogs, bulletin boards and other electronic exchanges of information on matters unrelated to Gateway business.

Compliance

If you have any question about the software and data on your computer, or if you have software or data installed on your computer equipment that is not in compliance with this policy, please contact your supervisor immediately. He or she can assist in removing software that does not comply with our standards and ensure that approved software is correctly installed and configured.

Because of the importance and serious nature of this policy, we reserve the right to – and from time to time, do – inspect computers for compliance with Gateway policy and our software vendors' license agreements. Such inspections may be made with or without notice.

CORPORATE COMPLIANCE PROGRAM

Gateway's Corporate Compliance Program is intended to demonstrate the absolute commitment of the organization to the highest standards of ethics and compliance. While we all must comply with the applicable laws that regulate our business, the following areas of law have been identified as risk areas to be covered by our Corporate Compliance Program:

- *antitrust*
- *clinical services documentation and billing (fraud & abuse)*
- *confidentiality of client records*
- *funding contract requirements/certifications*
- *licenses and certification requirements*
- *records documentation and retention*
- *tax exemption*

We take these standards for ethical and legal conduct seriously. We are vigilant in enforcing compliance with all relevant laws and regulations. We are further committed to correcting wrongdoing wherever it may occur in the organization. And we have established procedures for reporting violations, along with disciplinary guidelines for individuals who violate our Code of Conduct.

Your personal obligation to report

Compliance with ethical and legal standards depends on you. In fact, you have a personal responsibility to report any activity by any employee, subcontractor or vendor that appears to violate applicable laws, rules, regulations or this Code of Conduct.

Resources for guidance and reporting violations

If you feel you need guidance on an ethics or compliance issue or to report a suspected violation, we prefer the resolution of issues occur at the local level whenever possible. If you have a concern, please raise it first with your supervisor. If this is uncomfortable or inappropriate, then the matter should be reported directly to the next higher level of supervision. You may also contact the Corporate Compliance Hotline at 800-457-2598, or via the web at https://secure.ethicspoint.com/lrn/en/report_company.asp?clientid=19503

Gateway is committed to investigating all reported concerns about non-compliance promptly and confidentially to the extent possible.

We will make every effort to maintain, within the limits of the law, the confidentiality of the identity of any individual who reports possible misconduct. In addition, we prohibit any form of retaliation against any employee for reporting in good faith any actual or potential violations of the standards and policies under this Code of Conduct or for assisting in the investigation of a reported concern. This prohibition against retaliation does not preclude appropriate corrective action as a result of investigation findings of violations. However, anyone who deliberately makes a false accusation with the purpose of harming or retaliating against another employee will be subject to corrective action, up to and including release from employment.

Internal investigations of reports

Gateway is committed to investigating all reported concerns about non-compliance promptly and confidentially to the extent possible. The Corporate Compliance Officer will coordinate any findings from the investigations and immediately recommend corrective action or changes that need to be made. We expect all employees to cooperate with any investigation.

Compliance and the Code of Conduct

Any employee violating Gateway's Code of Conduct will be subject to corrective action which, depending on the nature, severity and frequency of the violation, may result in one or more of the following:

1. *Verbal or written warning*
2. *Final Warning*
3. *Reassignment*
4. *Release from employment*
5. *Restitution*
6. *Referral for possible criminal prosecution/civil action*

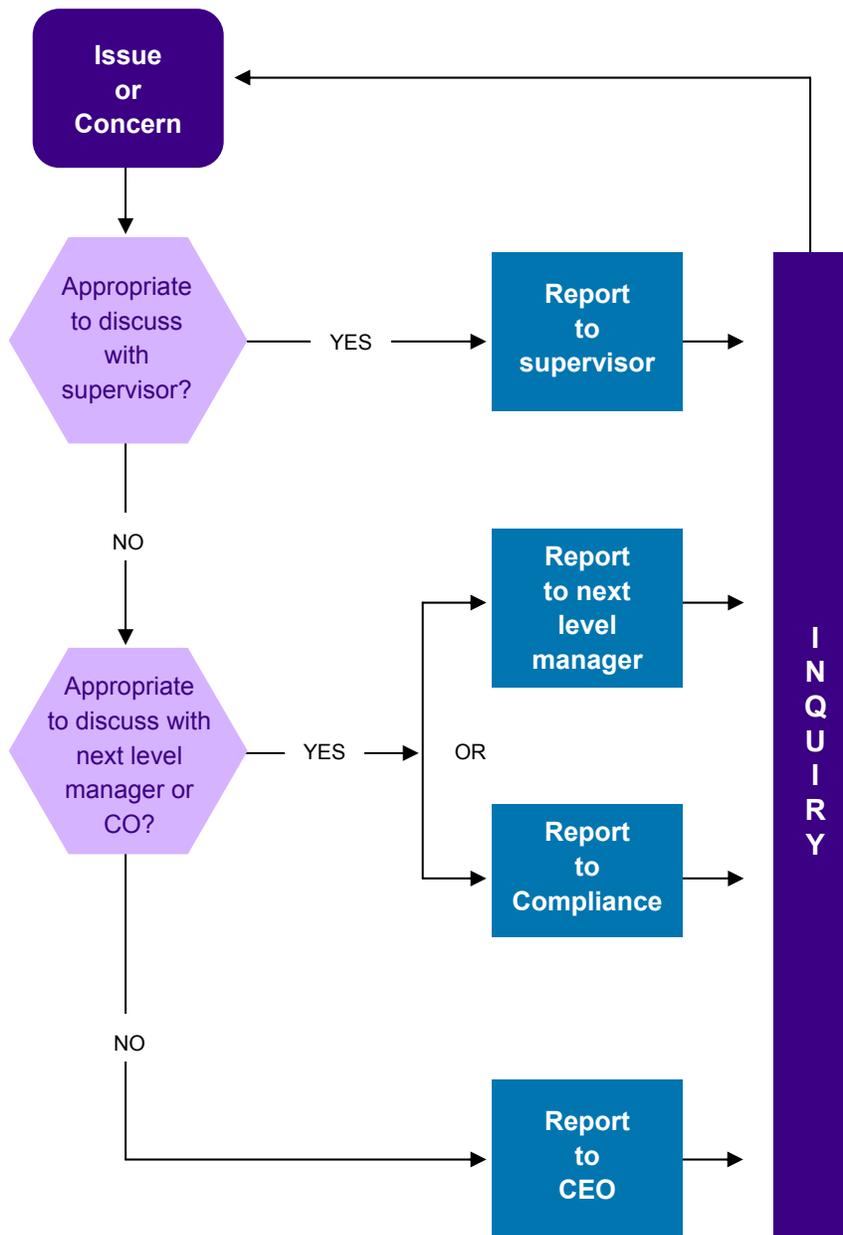
Public Health Program Compliance

Under the Deficit Reduction Act of 2005 (the DRA), any organization that receives at least \$5 million in annual fees under a state plan for services rendered on behalf of the public must establish written policies to ensure the accuracy of filed claims for all employees, contractors and agents in order to receive government reimbursement for those services.

It is the policy of Gateway and all our divisions, subsidiaries and operating or business units to consistently and fully comply with the DRA and all other laws that regulate how we prepare, deliver and bill for services on behalf of our clients through Medicare, Medicaid and other state and federal government programs. We refer to these as Public Health Programs.

To this end, Gateway adheres to the Corporate Compliance Program, which states the responsibilities and obligations of all our employees in submitting statements and invoices to Public Health Programs for reimbursement for services we have rendered. In addition, this policy applies to Gateway's business arrangements with counselors, vendors, contractors and other agents and/or third parties who may be affected by federal or state laws relating to the preparation, delivery and/or filing of Public Health Program claims for Gateway services.

HOW TO REPORT YOUR CORPORATE COMPLIANCE CONCERNS



Contact Corporate Compliance about:

- Fraud & abuse
- Licenses/Certifications
- Contract Compliance
- Records documentation
- 1-800-457-2598 or via the web at https://secure.ethicspoint.com/lrn/en/report_company.asp?clientid=19503

Contact Human Resources regarding:

- Employment laws
- Sexual harassment
- Code of Conduct
- Discipline issues
- 1-800-777-1833

FOR YOUR INFORMATION

In addition to Gateway's employment policies and practices and our Code of Conduct, other procedures keep our organization running smoothly, define who we are and help you fit in. Included in this section are facts, information, rules, opportunities and other insights into "how we do things" at Gateway.

IDENTIFICATION BADGES

At the beginning of your employment with Gateway, you will receive an identification badge which serves as verification of your employment with Gateway and identifies you as a co-worker when you are visiting other programs. It is important that you wear it at all times when you are at any Gateway program or facility.

It is important that you wear your ID badge at all times when you are at any Gateway program or facility.

If for some reason you do not have your ID badge with you on a regularly scheduled workday, you may request a temporary badge from your office manager or supervisor. If you should misplace your ID badge, please notify your supervisor immediately.

DRESS & PERSONAL APPEARANCE

We expect you to promote a professional Gateway image by being appropriately dressed during work hours or when representing the organization off site. While dress codes vary by facility, appropriate business attire should reflect neatness, moderation and good taste. Please ask your supervisor for a copy of the dress code at your program.

If you report to work improperly dressed or without attention to personal hygiene, you may be sent home without pay to make any required changes. If you have questions about what constitutes "appropriate" attire, please talk with your supervisor.

EMPLOYEE RECORDS

You may submit a written request to Human Resources to review or obtain a copy of your personnel file once every six months.



Personal information changes

If your personal status should change, you will need to notify your supervisor in writing. We need to be up to date on any changes in your name, address, telephone number, emergency contact information, marital status, tax information, dependents claimed or beneficiaries named. You may also be asked to provide verification of any requested changes.

Please remember: You may not use any Gateway location as your personal address.

SOLICITATION

Gateway has a “no solicitation” policy. We do not permit any employee to solicit or distribute materials of any kind during work time in work areas. Neither do we permit non-employees to distribute literature or solicit Gateway employees on Gateway property.

We do not permit any employee to solicit or distribute materials of any kind during work time.

Solicitation includes, among other things, sale of products or raffle tickets, requests for donations or contributions, solicitations for lotteries or sports pools and solicitations for membership in or for support of any organization or cause.

“Work time” refers to the period of time when you are performing your job duties. It does not include free time, such as time allotted for your meal break or your time before or after work.

BULLETIN BOARDS

Bulletin boards have been mounted in various locations at our Gateway facilities. They are intended for official Gateway postings and business, including current legal notices, our policies and practices, announcements, job postings and other general interest items.

We encourage you to review what we have posted on a regular basis so you can stay current and up to date.

Because our bulletin boards feature items related to official Gateway business and issues, we cannot allow you or any of our employees to post anything of a personal or other nature on them.

Bulletin boards are intended for official Gateway postings and business.

EXCLUSION FROM JOB DUTIES

At some point what you are asked to do on behalf of a client may conflict with your personal ethics or religious beliefs. Gateway is committed to providing you with a way to address aspects of client care that might conflict with your values, without adversely affecting the client's treatment.

If you have a conflict with an aspect of care and wish to be excluded from delivering services, you may submit to your supervisor the Employee Request for Exclusion from Job Duties form available from your supervisor or Human Resources.

While a decision about your request is being made, we expect you to continue to perform your regular duties. Refusal to provide care may result in corrective action. Under no circumstances will a request for exclusion from job duties be approved if it appears that an accommodation to your request would negatively affect the care of the client.

If your request is approved, Human Resources will notify you and your director or department head. You will also be notified of the effective date. If the request is not approved, Human Resources will notify the director or department head who will offer you the following options:

1. *you may continue working in your current position without the requested accommodation;*
2. *you may continue working and apply for a transfer to another position;*
3. *you may request a personal leave, and apply for a transfer;*
4. *you may resign from your position.*

A DAY OF REST

If you are a non-exempt employee, you are to be granted a minimum of one day of rest in a workweek. For example, after working a standard five-day week, you may work overtime on the sixth day. However, you would be expected to “rest” on the seventh day.

Gateway begins its workweek on Sunday; your first day worked on or after Sunday counts as Day One under this rule.

MEAL BREAKS

If you work at least five hours in a work day, you will receive a 30-minute unpaid meal break at a time approved by your supervisor. Non-exempt employees may not take their meal breaks at their work stations. You must let your supervisor know immediately if you did not take a meal break.

EMERGENCY CLOSING

There are times when flooding, ice, snow storms or other emergency, such as loss of electrical power, may make it difficult to fully staff a Gateway facility or program. Nevertheless, you are expected to report to work if the office or facility is open, even if the weather is inclement. We expect that you will observe weather conditions in your area and determine whether it is too hazardous to travel to work. If you decide not to come to work and the facility is open for business, you must notify your supervisor and use accrued PTO.



Inclement weather day

When weather conditions make it extremely difficult or dangerous for some employees to come to work, a Gateway Vice President may declare an Inclement Weather Day. Tardiness or absence on a declared Inclement Weather Day will not be subject to Gateway’s attendance policy. If your office or facility is closed for your shift, your supervisor will contact you and let you know not to come in as scheduled.

NO SMOKING

While we recognize that the decision to smoke is a personal one, all Gateway facilities are smoke free. Smoking is permitted only in designated areas outside our facilities.

TELEPHONES

Gateway telephones are intended for business use. When you are speaking with clients, suppliers, third-party payers and others, you are representing the organization. Understandably, we expect you to conduct yourself professionally and courteously.

When you are speaking with clients, suppliers, third-party payers and others, we expect you to conduct yourself professionally and courteously.

Business communication is a substantial expense to Gateway, with telephone usage a major part of that expense. Because Gateway telephones are to be used primarily for business purposes, personal usage should be kept to a minimum. We ask that you use good judgment when it comes to personal calls and advise personal callers to limit their calls to those which are necessary. Long distance calls are restricted to Gateway business.

CELLULAR PHONES, PAGERS AND PERSONAL DIGITAL ASSISTANTS (PDA)s

The use of cellular phones in the workplace has become commonplace. Please be aware that some of our programs or facilities may not allow you to bring your personal or business cell phone on the premises, particularly in a correctional facility. We expect that you will abide by the cell phone rules of any contractor or funder when you are on Gateway business.

If you are able to bring your personal cell phone to work, you're expected to use good judgment about using it and limit personal interruptions. When you are at a Gateway facility or program, please be sure your cell phone is turned off or on "vibrate only" so as not to disturb others. Hands-free equipment for cell phones may not be used while at a Gateway facility or program.

While using any cell phone, we expect you to use it safely and courteously. Please be respectful of the people around you, especially your language, tone and the volume of your voice. You should have no expectation of privacy if you choose to have a conversation in the presence of employees, clients or guests.

Due to the confidential relationship we maintain with our clients, employees are not permitted to use a camera or "camera" cellular phone to take pictures of any Gateway clients or client family members under any circumstances. Violation of this rule will result in corrective action.

When using cell phones or other communication devices (i.e., pagers, PDAs), whether personal or company provided, for business purposes while operating a motor vehicle of any kind, you are expected to use hands-free equipment and/or pull over to the side of the road to conduct business, as well as abide by an local or state laws regarding cell phone usage.

MAIL

Personal mail should be delivered to your home. The only mail you should be receiving at Gateway is that which pertains to the work you do for the organization.

ELECTRONIC MAIL AND INTERNET USE

Gateway's electronic mail, or email, systems are intended to help you and other employees conduct Gateway business and facilitate good internal and external communication.

See "Information Systems" for a more complete discussion.

VISITORS IN THE WORKPLACE

At Gateway, we discourage visits from guests who have nothing to do with our operations. That is, family members, former employees and friends should not be on our premises.

We recognize that employees with children often face a dilemma when workplace demands conflict with child care demands. If you have children, they should not come to work with you as they may be disruptive to the workplace and are at risk of injury when unsupervised.

When work projects are flexible, requests to use accrued PTO to care for your children may be accommodated. If you need to schedule PTO to cover school holidays, please discuss this with your supervisor as far in advance as possible.

We discourage family members and friends from being on our premises.

WORKERS' COMPENSATION: *Injury on the job*

If you are injured on the job, you should immediately report it or any work-related accident to your supervisor to ensure your safety and the safety of other Gateway employees and guests. You should also seek any necessary medical attention right away for the sake of your health and well-being.

Under the provisions of the Workers' Compensation Act in your state of employment, you are covered with "workers' comp" for injuries incurred while performing your job.

After you have informed your supervisor of your work-related injury, he or she will take the steps needed to report the incident to our insurance provider. You will be asked to complete a statement regarding the circumstances of the incident and your injury. We also expect you to cooperate fully in completing required paperwork and/or reporting for any required medical examinations.

Workers' comp benefits, including any off-work wages, will be provided as determined by our insurance carrier in accordance with state regulations.

Notify your supervisor immediately if you have sustained an injury on the job.

INFECTION CONTROL

For the safety of staff, clients and visitors, you are expected to abide by the rules and regulations of Gateway's Infection Control and Standard Precautions policies. A copy is included in your program's operations manual, and posted on Gateway's Intranet.

USE OF VEHICLES

Personal Vehicles

If you have a personal vehicle and use it for Gateway business, you'll be reimbursed for mileage at the current rate established by Gateway. If you incur parking or driving violations while on Gateway business, they are your sole responsibility, although you are expected to notify Gateway of any driving infractions or moving violations received. Similarly, damage to your personal vehicle is your responsibility.

We also consider it your responsibility to maintain insurance which meets state mandated limits for your state of residence. You may be asked to show evidence of this insurance before you are permitted to use your personal vehicle for Gateway business.

Transporting Gateway clients in private vehicles is prohibited.

Gateway-owned vehicles

Only Gateway employees who have received prior authorization and clearance from their supervisor and Human Resources may drive Gateway-owned vehicles. If you incur parking or driving violations while on Gateway business in a Gateway-owned vehicle, they are your sole responsibility. You are also expected to report any accidents or moving violations which occur in a Gateway vehicle to the police and to your supervisor immediately.

If you're convicted of a serious traffic violation, have multiple traffic violations or have your driver's license suspended or revoked, you are expected to report it to your supervisor immediately, and you may not be allowed to drive Gateway vehicles in the future. Failure to report such information will result in corrective action.

PERFORMANCE REVIEWS

Performance Evaluation Process (PEP)

We know you work hard and strive to do your best day in and day out. Every year you will receive a review of your job performance over the last 12 months. If you are a new employee, your supervisor will review your performance after 90 days of service. Thereafter, your performance will generally be reviewed each year on the anniversary of your most recent date of hire or promotion.

At Gateway, this performance evaluation and improvement process is called PEP, or the Performance Evaluation Process. Generally, you will receive a copy of the PEP form with expectations and criteria for evaluation for your job at hire, and again during your annual review.

You are entitled to an annual review of your job performance over the last 12 months.

Your annual performance review, which is conducted by your supervisor, provides you with information about how well you have performed your job responsibilities and identifies any areas that may require improvement. This is also an opportunity for you to discuss your career goals and how you can achieve them. Your supervisor may recommend a change in pay based on such factors as overall job performance, current level of pay and/or the value of your skills in the market.

Copies of your PEP evaluations are kept in your personnel file.

Performance Improvement

If there are areas of significant concern regarding your performance, you will receive additional coaching via a Performance Improvement Plan (PIP).

Through PIP, your supervisor will work with you to address areas of concern and develop an improvement plan to bring your performance to an acceptable level. You will be expected to demonstrate improvement to the acceptable level within a predetermined time frame, but no more than 60 days.

JOB CHANGES

Promotions and transfers

If you're like most people, you want to get ahead in your job. You'd like to achieve a promotion at Gateway! A promotion is what happens when you move to a job in a different pay grade with a greater pay range midpoint.

A transfer occurs when you change from one job to another job within the same pay grade. Your job change may be a move within your department or program, or it may be a move to a new department or program.



To be eligible for a promotion or transfer, you should have successfully completed your Introductory Period, received an 'Achieves Expectations' (2.0) or better rating on your last PEP evaluation, as discussed in the previous section, and had no corrective actions in the last six months. Any exceptions to these standards must be approved by Human Resources.

Other factors for consideration include but are not limited to, your length of service, time in the current job and any applicable experience and/or skills required for the job.

Demotions

You may request to transfer to a job in a different pay grade with a lower pay range midpoint. A demotion may be necessary if you are not fulfilling the responsibilities of your position, no longer meet the requirements of the position or are not competently performing your duties. Or you may be offered a position in a pay grade with a lower pay range midpoint if your current position is eliminated.

You may receive a salary reduction at the time of demotion. The amount of salary reduction will be reviewed and approved by Human Resources.

PAY DATES & PAYCHECKS

The regular work week at Gateway begins at 12:00 a.m. on Sunday and ends at 11:59 p.m. on Saturday.

Wages are paid bi-weekly. Each bi-weekly pay period begins at 12:00 a.m. on Sunday and concludes at 11:59 p.m. on the second following Saturday. Employees are paid every other Wednesday.

Wages are paid bi-weekly – every other Wednesday.

You'll need to provide your supervisor with a current, non-work mailing address to ensure timely delivery of paychecks or direct deposit advices by U.S. mail delivery.

We strongly encourage you to use direct deposit for your Gateway paycheck. This way you are sure to have your earnings available in your checking or savings account on the pay date.

TIME RECORDS

Non-exempt employees

By law, Gateway is required to keep detailed time records for all non-exempt employees. This means you are required to log in and out on the time clock at your facility, or complete an individual time log, to record the hours worked for your shift.

You may not begin work more than seven minutes prior to the start of your shift, nor are you permitted to end work more than seven minutes after the completion of your shift without supervisory approval. Your supervisor will record any absences in the timekeeping system. All time records will be reviewed and approved by your supervisor prior to submitting them to payroll for processing your pay check.

We are required to keep detailed time records for all non-exempt employees.

If you misplace your time badge, please notify your supervisor immediately. There is a minimal fee for a replacement time badge.

Exempt employees

If you are an exempt employee, you are generally not required to keep detailed time records of your hours worked. Your supervisor will record any absences in the timekeeping system, and will review and approve your time record prior to submitting it to payroll.

It is Gateway's policy to comply with the salary basis requirements of the Fair Labor Standards Act (FLSA) and not allow deductions that violate the FLSA. Understandably, we prohibit managers from making any improper deductions from the salaries of exempt employees.

Falsification of time records

You may not log in or out of a time clock for a coworker, complete the time log of another employee or falsify any time record. Any falsification of a time record will be subject to corrective action.

OVERTIME

Occasionally, you may be asked to work additional hours beyond your normal weekly schedule. All additional hours must be approved in advance by your supervisor.

If you are a non-exempt employee, you are eligible for overtime pay if you work more than 40 hours in one week. If you are requested to work overtime, you will be paid at one-and-one-half times your regular hourly rate. Hours worked in excess of your regular schedule, but less than 40 will be paid at "straight time" using your normal hourly rate. Any paid benefit hours, such as PTO, CAT, jury duty or bereavement, will not be counted as time "worked" in the calculation of overtime hours.

Exempt employees are not eligible to receive overtime pay.

PAYROLL DEDUCTIONS/CORRECTIONS

If you look closely, you will notice that your paycheck or direct deposit advice lists deductions for federal, state and local withholding taxes where applicable, FICA (Social Security) insurance, benefits and other deductions.

Please take a moment each pay period to review your deductions and accruals to ensure they are correct.

The accruals listed on your check stub also include PTO and CAT accruals earned and taken during the current pay period. Please take a moment each pay period to review your deductions and accruals to ensure that they are correct. If you believe an error has been made, please report it immediately to your supervisor.



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GATEWAY PROGRAMS

Gateway offers treatment to adults and youth in both Community- and Corrections-based settings. Over the years, programs to address the unique needs of women, youth, those individuals with co-occurring disorders, and other special-needs populations have been added to the types of services Gateway provides.

COMMUNITY-BASED PROGRAMS (DELAWARE, ILLINOIS,)

Each year Gateway treats more than 11,000 clients in community-based programs.

Families, social service agencies, EAPs, schools, health care workers, insurance companies, parole and probation officers, judges and caseworkers refer their clients to Gateway because they know that Gateway's successful treatment models combined with its highly trained staff yield the best results. Gateway's goals are simple: to help clients achieve and maintain a life of sobriety and to become productive citizens in the community.

Gateway staff work and live in the communities we serve. Gateway provides the best of both worlds -- community-based localized services with the organizational efficiency of a well established national infrastructure.

Gateway manages community programs in the following cities:

*Delaware City, Delaware
Aurora, Illinois
Belleville, Illinois
Carbondale, Illinois
Caseyville, Illinois
Chicago, Illinois (multi-locations)
Lake Villa, Illinois
Springfield, Illinois*

CORRECTIONS-BASED PROGRAMS (ILLINOIS, MISSOURI, NEW JERSEY, TEXAS)

Gateway provides treatment in numerous correctional facilities to over 17,000 men, women, adolescents and dually diagnosed substance abusers every year. Our programs use Therapeutic Community (TC) paradigms, and are supplemented by Cognitive Self-Change methods. Programs range in size from 60 beds to 632 beds.



In addition to providing substance abuse treatment services to individuals while they are incarcerated, Gateway assists individuals in gaining access to a full spectrum of services upon their release. Studies have repeatedly demonstrated that a continuum of care after release results in far better outcomes (lower recidivism) than in-prison treatment alone.

Gateway offers treatment in correctional or post-incarceration facilities in the following areas:

Chicago, Illinois
Bowling Green, Missouri
Maryville, Missouri
St. Joseph, Missouri
St. Louis, Missouri
Vandalia, Missouri
Annandale, New Jersey
Bridgeton, New Jersey
Clinton, New Jersey
Delmont, New Jersey
Newark, New Jersey
Yardville, New Jersey
Brownwood, Texas
Gatesville, Texas
Hondo, Texas
Houston, Texas
Huntsville, Texas
Richmond, Texas

WOMEN'S TREATMENT

Gateway was one of the first drug treatment programs in the country to develop specific treatment protocols for women. Extensive research shows that women need specialized, comprehensive, gender responsive services if they are to overcome problems of substance abuse. Gateway's community-based and corrections-based programs address issues of importance to women including physical and mental health, self esteem and coping skills, parenting skills, GED and job interview training, as well as many others.

YOUTH TREATMENT

For teens struggling with a substance abuse problem, Gateway offers help and a chance at new beginnings through residential and outpatient treatment programs throughout Illinois. Teens experience unique problems with substance abuse and criminal thinking and behavior because of the powerful influences of peer pressure during adolescence. The goals for each youth care client are abstinence from alcohol and drugs, developing positive attitudes and health habits, re-establishing family relationships and improving their education.



BRIDGE PROGRAM

Caught between adolescence and adulthood, male teens aged 18 - 19 represent a special treatment challenge. At Gateway, we've pioneered programming that is specially designed to support them. Our Bridge Program, located in Lake Villa, Illinois, offers counseling, curriculum and a residential setting to meet the needs of this unique population.

The Bridge Program also offers the Gang Outreach Program, which supports clients who wish to sever ties with street gangs.

SPECIAL NEEDS POPULATIONS

Special populations that Gateway serves include clients who are dually diagnosed with a substance abuse disorder and a mental illness, cognitive impairment or physical/medical disability.

Gateway began providing mental health services in conjunction with its therapeutic community in the Estelle Unit in Huntsville, Texas in 1994.

Since then, Gateway has expanded these crucial services in both its corrections and community-based programs, offering access to mental health treatment throughout all of its programs.



IMPORTANT PHONE NUMBERS AND CONTACTS

My Facility _____

My Supervisor _____

Human Resources 312.663.1130 or 800.777.1833

Payroll 312.663.1130 or 800.777.1833

Corporate Compliance 800.457.2598

Help Desk 312.913.2335 or x2335

EAP 800.227.8620

Other

Other

Other



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EMPLOYEE ACKNOWLEDGEMENT

I acknowledge that I have received my copy of the Gateway Employee Guide.

I understand that the Guide has been developed for the general guidance of Gateway's employees and that it is my responsibility to read and acquire an understanding of the information contained in the Guide. I have been advised that my immediate supervisor is available to answer any questions I may have concerning the Guide and the policies, practices and procedures outlined in it. Furthermore, I understand that neither the Guide nor any of its individual terms constitutes or represents binding contractual commitments on the part of Gateway, and that the policies, benefits and rules described in the Guide can be unilaterally changed or discontinued by Gateway at any time without prior notice. I recognize that I am an employee-at-will and may resign at any time or be discharged at any time for any reason or no reason, with or without cause.

Because the information, policies and benefits described here are necessarily subject to change, I acknowledge that revisions to the Guide may occur, except to Gateway's policy of employment-at-will. As new policies are enacted or current policies are revised, I acknowledge that I may receive additional or revised information that may supersede, modify or eliminate existing policies to include in my Guide. Only Gateway's Vice President Human Resources has the ability to adopt any revisions to the policies in the Guide.

I understand that the Employee Guide, although assigned to me, is considered property of Gateway and I will be expected to return it upon separation from Gateway.

I, _____, *have received the Employee Guide.*

Print Name

I certify that I have read the Guide and understand the policies, procedures and practices contained in it.

Date

Signature

